

New York State Weatherization Assistance Program

Program Year 2020 State Plan
FINAL

New York State Homes and Community Renewal
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Executive Summary

The New York State Weatherization Assistance Program Plan for Program Year 2020-21 serves as New York's application to the US Department of Energy for Weatherization funds, and as the guide for the allocation of an estimated \$66.8 million in Federal residential energy conservation funding. These funds will assist to more than 7,400 households across the State in 2020-21. The program is administered by New York State Homes and Community Renewal (HCR), which has primary responsibility for the State's housing and community renewal programs. HCR is uniquely positioned to deliver Weatherization services, in coordination with other State agencies and our local partners.

The purpose of the Program is to reduce energy and utility costs by installing energy efficiency measures in the homes of income-eligible persons, especially homes occupied by the elderly, persons with disabilities, and families with children. Program funds are targeted to the most efficient and cost-effective efficiency measures, determined from a comprehensive on-site energy audit of the building. The Weatherization program reduces the State's overall energy consumption, as well as carbon emissions that contribute to climate change. It also lessens the impact of higher energy costs on low-income families and improves the health and safety of assisted households.

New York implements the program through a network of local providers with expertise in energy efficiency. These program **subgrantees** provide energy efficiency services using their own trained staff and by subcontracting work to qualified weatherization contractors. Energy efficiency measures funded by the program range from air sealing and insulating single-family homes to replacement of building-wide mechanical systems in large apartment buildings. The program assists all types of housing, including detached single-family homes, multifamily apartment buildings, manufactured housing and group homes. Program services are provided in each of the State's 62 counties.

Weatherization assistance can be invaluable for low-income households in New York. The State's climate, with cold, snowy winters and hot, humid summers, generates a high demand for heating fuels and electricity. Many eligible households live in inefficient, often unsafe housing that was built when energy was cheap and plentiful and cannot afford the cost of weatherization work that will lower their utility bills. In its May 2016 Order Adopting Low Income Program Modifications and Directing Utility Filings, the New York State Public Service Commission adopted a policy that low income households in the State should not have an energy burden greater than 6% of household income and called for State agencies to provide energy efficiency and bill-payer assistance programs. HCR and the Weatherization Assistance Program are key resources to implement that policy.

HCR will distribute Program funding in 2020 in accordance with this Plan. The Plan follows DOE's recommended format: Section One provides an overview of the Program; Section Two discusses the source of funds for Program Year 2020-21; Section Three provides details on the funding allocation formula, the program budget and subgrantee information.

Section Four describes program implementation, including expected production levels, estimated energy savings, other funds and public participation in the development of the plan. Section Five includes Program eligibility requirements, priorities for assistance, the types of work that will be done and details on training, technical assistance and monitoring.

The Weatherization Assistance Program provides significant contributions to the State's economy and to the well-being of low-income residents. Each dollar invested in program activities will result in a savings of about three dollars in energy costs over the life of the installed measures – money that is returned to local economies across the State. The health and safety work the Program funds prevents illness and injury and helps keep housing affordable.

Section I - Introduction

The Weatherization Assistance Program (the “Program”) is administered in New York State by the Division of Housing and Community Renewal (HCR), through the Office of Housing Preservation. The Program provides energy services to income-eligible individuals and families to improve the energy efficiency of their homes and to reduce their household expenditures for fuel. Since the inception of the Program in 1977, more than 720,000 housing units in New York State have been made more energy efficient due to investment of Weatherization Program funds.

Priority for weatherization activities is given to households with children, the elderly, and persons with disabilities. Priority is also given to dwelling units occupied by households that receive Low-Income Home Energy Assistance (HEAP), those with high fuel costs in relation to their household income, and to properties where other state and Federal housing resources will be leveraged.

Program services are delivered through a statewide network of local service providers, referred to as “subgrantees.” Subgrantees include community action agencies, other community-based not-for-profit organizations, and local governmental agencies. Under contract with HCR, subgrantees conduct outreach and intake, evaluate buildings to be weatherized, install energy-saving measures, identify and mitigate related health and safety concerns, supervise weatherization work performed by staff and subcontractors, maintain client and program files and report on production and expenditures. HCR has the responsibility for overall monitoring and oversight and provides an ongoing training program to maintain a high level of quality. HCR requires that subgrantees follow sound internal management policies and provide skilled workmanship, high quality materials, and timely production of units.

Federal rules require states to submit an annual plan for administration of the program. This plan was prepared in accordance with the Final Rule for the Program (10 CFR Part 440), and with available grant guidance issued by the US Department of Energy (DOE). It includes information required by DOE to access funding for the program.

Section II - Funding

II.1 Funding Sources

HCR expects to receive funds for the program from the US Departments of Energy (DOE) and Health and Human Services, which provides HEAP funds to the State Office of Temporary and Disability Assistance (OTDA). A portion of the State’s allocation of HEAP funds is passed through to HCR for the Program. HCR allocates Program funding to each county based on a formula which includes factors related to income-eligible population and climate and sets aside funds to provide a minimum level of funding for each county where the allocation formula did not generate significant program funding.

II.2 Funding for the 2019-20 Program Year

For the 2019-20 program year, HCR had \$66.8 million available to administer the Weatherization Program. This included \$23.3 million in DOE funds, \$40.5 million in HEAP funds, and \$3 million in funds from the prior year.

II.3 Funding for the 2020-21 Program Year

HCR anticipates availability of \$66.8 million in WAP funds for Program Year 2020. This amount includes \$23.3 million in DOE funds, \$40.5 million of new HEAP funds, and \$3 million in prior year funds.

This Plan is based on draft DOE guidance for the Weatherization Program that was released prior to the issuance of federal appropriations. Federal appropriations for the Weatherization and HEAP funding have yet to be enacted but it is expected that DOE will issue final Federal Fiscal Year 2020 allocations to States in early 2020. At that time HCR will adjust subgrantee allocations based on the final WAP and HEAP funding levels using the method described below.

HCR will provide funds to eligible subgrantees based on a formula that measures relative geographic needs, provided the subgrantee is in compliance with applicable State and Federal program requirements and has successfully completed work associated with their Program Year 2019 allocation. The Program Year will begin April 1, 2020 and end March 31, 2021. See Section IV.1 for information on contract and budget periods and a detailed explanation of allocation formulas.

Section III – Budget

III.1 Program Budget

HCR expects \$66.8 million in Federal funds to be available to support Program activities in Program Year 2020. The DOE Program allocation for Federal Fiscal Year 2020-21 is anticipated to be \$23.3 million. HCR also expects to receive \$40.1 million in HEAP funds, or 10% of the allocation received by New York State. In addition, \$3 million in prior year HEAP funds will be available in Program Year 2020.

The funding sources are summarized below:

| | |
|------------------------------|------------------|
| DOE Funds | \$ 23,300,000 |
| HEAP Funds | 40,100,000 |
| <u>Prior Year HEAP Funds</u> | <u>3,000,000</u> |
| Total Available | \$ 66,400,000 |

Up to \$5.2 million in DOE and HEAP funding will be retained for administrative, leveraging and training and technical assistance costs.

The balance of approximately \$61.2 million will be allocated to subgrantees for program operations, as described below. Subgrantee allocations are listed in Appendix C.

III.2 Funding Allocation Formula

Program funding is allocated by a formula which factors in climate (heating and cooling degree days) and the share of low-income households in each county (see Appendix

B). This allocation methodology is based on the method used by DOE to allocate Program funding to the states.

The first factor in the allocation formula (degree days) is determined by calculating the relative heating degree days and cooling degree days for each county, compared to the State average, with cooling degree days given 1/10th the weight of heating degree days. An average degree day total has been established for each county using 30-year averages (1971-2000) for weather reporting stations in those counties. In counties where there were two or more reporting stations, degree days were averaged. In counties where reporting stations did not have 30-year averages, the next closest stations were used. The average of the degree days for each county was then divided by the average of the degree days for the State as a whole to yield a percentage. This ratio of each county's degree days to the State average (7020) is the first factor in the allocation formula.

The second factor in the allocation formula is determined by calculating each service area's number of low-income households as a percentage of all such households in the State. This number of income-eligible households was determined by using 2010 American Community Survey data from the US Census Bureau for households with estimated incomes below \$35,000. This figure was then divided by the total number of such households in the State to yield a percentage of the total low-income households for each county.

These two factors (the percentage of low-income households in each county and the ratio of the county's degree days to the New York average) were multiplied to determine the final percentage for each county. Since the degree day factor represents the relative extent to which each county is above or below the State average, the total of formula factors does not total one hundred. As a result, the final percentages were adjusted to total 100 percent overall using an adjustment factor applied uniformly to all counties.

This resulting percentage represents the portion of the total State allocation each county is to receive. This percentage is then multiplied by the amount available for allocation by formula after setting aside funds for technical support subgrantees and minimum funding allocations to determine each county's allocation. HCR has identified distinct service areas that have boundaries consistent with census tracts. Each subgrantee within these counties has signed an agreement to provide services to their designated service area. Where a subgrantee service area includes less than one county, proportionate allocations to subgrantees are further determined using census tract data calculating the number of low-income households in each subgrantee's service area.

In some counties, application of this allocation formula does not result in enough funding to operate the program effectively. Most of these counties are in the colder regions of the State and have fewer income-eligible households than other counties. Thirty-three counties receive a formula allocation of less than \$400,000. For Program Year 2020, subgrantees serving a single county with a formula allocation of less than \$400,000 will receive an allocation of \$400,000.

HCR finds that it is generally more efficient for a single subgrantee to administer the program in multiple counties when one of the counties has a small population. Subgrantees serving all of two counties, where one of the counties is below the minimum funding level, will receive an allocation equal to the greater of \$775,000, or the sum of the largest county allocation in the multiple-county area and \$375,000 for the additional county. Subgrantees serving three or more counties where the additional counties are below the minimum funding

level will receive an additional \$250,000 for each additional county beyond the second, or the sum of the county allocations if that amount is larger.

Accordingly, 11 subgrantees that serve a single county will be funded at the minimum allocation level, and 17 subgrantees that serve multiple counties will receive adjusted allocations.

The formula factors that are used to determine allocations have been calculated using 2010 US Census Bureau data from the American Communities Survey. HCR received assistance in updating this data from the Cornell University Institute for Social and Economic Research.

Allocations to individual subgrantees will be subject to a review of each subgrantee's production and expenditures during the Program Year and adjusted downward or incrementally funded where HCR determines that the initial allocation may exceed subgrantee capacity. Subgrantees that do not show adequate monthly progress in expenditures and unit production will not be eligible to access any additional funds that become available during the program year and may be subject to reduced allocations in future years.

III.3 Subgrantee Selection

HCR does not anticipate adding any subgrantees in Program Year 2020. Wayne County Action Program, Inc. will be responsible for administering the Program in Cayuga County (in addition to Wayne and Ontario Counties) as the subgrantee for Program Year 2020 and going forward, as the former subgrantee for Cayuga County has left the WAP. Existing subgrantees generally receive funding each year during a grant period unless the subgrantee withdraws, or HCR monitoring of the subgrantee indicates serious, irresolvable problems. HCR program and fiscal monitoring examines the overall compliance of subgrantees with rules on expenditure of grant funds, production, work quality, and compliance with Federal and State laws, regulations, policies, and procedures. When serious concerns arise, a determination is made regarding the subgrantee's ability to continue providing weatherization services.

When HCR determines that additional subgrantees are needed, selection of a new subgrantee is based on a proposal submitted to HCR, which is evaluated by program and fiscal staffs, as well as testimony offered at a public hearing in accordance with 10 CFR Part 440.15(d). In accordance with these minimum guidelines, a potential new subgrantee must:

- be a not-for-profit, legally incorporated organization, or a unit of local government, or the designated representative of an Indian tribal organization;
- if a not-for-profit organization, meet the charities registration requirements of the State of New York;
- be in legal and financial compliance with requirements and regulations established under State and Federal law;
- provide a list of the current board of directors or governing body, bylaws and other documents concerning the structure and operation of the organization;
- provide proof that the organization has been responsive to the needs of the community by citing the programs and services in the energy or human services area that it has implemented; or, be able to demonstrate that the organization has the potential to provide such services in an efficient and responsible manner;
- demonstrate special expertise for providing energy conservation programs including management capability, technical skills, outreach capabilities, etc.;

- show experience in housing and construction management-oriented programs;
- submit a detailed budget and narrative work plan showing how the project will be carried out. The budget should list all personnel, including volunteer and paid staff, who will be associated with the program. The work plan will detail how the project will be implemented. Potential weatherization subgrantees must also show a production and expenditure plan, specifying whether subgrantee crews, subcontractors or a combination of the two will be used. New subgrantees will be expected to meet or exceed the work plan goals they propose.

In accordance with 10 CFR Part 440.15, when selecting new subgrantees the State is required to give preference to existing subgrantees that are currently administering an effective program. Additional consideration is given to subgrantees located in an adjacent service area. This helps maintain existing experienced subgrantees and provides for economies of scale in allocating administrative costs.

III.4 Subgrantee Labor

New York contracts with subgrantees to deliver program services at the local level. These subgrantees have various systems in place to provide weatherization in their service areas. All subgrantees use in-house staff for some components of the program, such as outreach, energy auditing, air sealing, or inspections. Many subgrantees use subcontractors to perform some of the basic weatherization work, such as attic and sidewall insulation and window installation. Most subgrantees use subcontractors for heating system work, however, several use in-house staff for heating system work. HCR has encouraged subgrantees to develop the capacity to perform heating system repairs with subgrantee staff, to assure quality heating system work and to reduce costs. HCR provides training on heating system work as part of the Program's technical assistance program. HCR also encourages subgrantees that assist substantial numbers of multi-family buildings to develop in-house capacity to perform multi-family audits.

Subgrantees may use volunteers to supplement weatherization activities. However, due to the technical nature of the program, the use of volunteers is generally restricted to non-technical areas.

Article 15-A of New York State Executive Law was enacted to promote equal opportunity in contracting for all persons, without discrimination for minority group members, service-disabled veterans and women and business enterprises owned by them, and to eradicate the barriers that have impaired access by minority and women-owned business enterprises to State contracting opportunities. State agencies must take affirmative actions to provide opportunities for minority- and woman-owned business enterprises and firms owned by service-disabled veterans. Participation goals have been adopted to ensure the opportunity for meaningful participation of such business enterprises in the work to be undertaken by each subgrantee. These goals are expressed as a percentage of the total value of all work under each contract. HCR staff continues to monitor the progress of each subgrantee in meeting these goals, and provides technical assistance, as necessary, to maximize compliance with the law.

Section IV - Program Implementation

IV.1 Subgrantee Contracts

HCR entered into three-year contracts with each subgrantee in 2017 to provide weatherization services. These contracts are divided into defined budget periods, referred to in the contract as “program years,” and will include all current requirements for annual production, expenditure, closeout, and reporting. These contracts include both DOE and HEAP funds; payments made during the year are based on funds encumbered at the start of the budget year. HCR maintains copies of executed contracts and amendments to confirm subgrantee acknowledgement of current-year terms and conditions. On November 4, 2019, DOE issued WAP Memorandum 55 which extended the contracts for an additional year, creating a four-year grant cycle with Program Year 2020 becoming the final budget period of the four-year contract. Each subgrantee will be required to complete all work and expend all funds by the end of the Program Year.

The minimum number of units to be weatherized will be specified in the contract with each subgrantee. The individual cost per unit for each subgrantee will be determined prior to the start of the program year, and is based on local conditions, such as labor costs, travel requirements and the predominate building type in the subgrantee’s service area (single family, multifamily or mobile home). Statewide, HCR expects the average cost per unit to be approximately \$7,000, with average costs for single-family buildings somewhat higher, and average costs for multifamily and mobile home units lower. The minimum number of units to be completed by each subgrantee will be determined using the following formula:

$$\frac{\text{total allocation} \times .82}{\text{average cost per unit}} = \text{contract production requirement (materials, labor and program support)}$$

An average of 18 percent of each subgrantee's allocation is reserved for administrative and capital expenses, health and safety work, financial audits, liability insurance, and technical assistance, leaving 82 percent available for energy efficiency measures. For example, if a subgrantee is allocated \$500,000 and the subgrantee’s average cost per unit is \$6,900, the minimum number of units the subgrantee is required to complete in the program year is 59:

$$\frac{\$500,000 \times .82}{\$6,900 \text{ per unit}} = 59 \text{ units}$$

Each subgrantee will be allowed to use six percent of the first \$1,500,000 of their allocation, and five percent of the balance of the allocation for administrative costs. For example, a subgrantee with an allocation of \$1,000,000 would be allowed to use up to \$60,000 of the allocation for administrative costs, and a subgrantee with an allocation of \$2,000,000 would be allowed to use up to \$115,000 for administrative costs (((\$1,500,000 X .06) + (\$500,000 X .05)).

HCR will provide training and technical assistance funds directly to subgrantees and, through separate agreements, to providers that meet the DOE and National Renewable Energy Lab’s (NREL) accreditation requirements for the WAP. Appendix C shows each subgrantee’s estimated allocation.

IV.2 Dwelling Unit Production

During Program Year 2020, HCR expects to weatherize 7,000 dwelling units with HEAP, DOE and leveraged funds. This production level is based on the estimate of units to be completed by each subgrantee. The average cost per unit (CPU) for each individual subgrantee will be determined based on a review of prior year costs. The statewide average CPU will be approximately \$7,000, but individual subgrantee average CPU may be higher or

lower than this figure. On average, units assisted by the Program will receive \$2,397 in DOE funds and \$4,603 in HEAP funds. This approach will ensure that New York complies with 10 CFR Part 440.18 for the expenditure of DOE funds, and that average investment of DOE funds in assisted units will not exceed the 2020 expenditure limit of \$7,669. Subgrantees will generally be allowed to use up to 10% of contract funds to address health and safety deficiencies in assisted units, but in higher-cost areas a higher percentage may be allowed on a case-by-case basis.

The following table summarizes the expected unit production by tenure:

| Projected Unit Distribution, Program Year 2020 | | | |
|---|--------------|--|--|
| Unit Tenure | Units | | Percent of all units to be assisted |
| Owner-occupied | 2,800 | | 40% |
| Renter-occupied | 4,200 | | 60% |
| Single-family (1-4 unit) rental | 798 | | |
| Multi-family rental | 3,402 | | |

IV.3 Energy Savings

With its cold winters and high energy costs, New York State exceeds the national average in both energy consumption per household and energy expenditures per household. In 2015, State residents expended, on average, \$2,143 per household on energy costs, compared to a national average of \$1,836¹. Low-income households spend more than 10 percent of household income, on average, for heating and other energy expenditures, compared with just 3.3 percent for all households². These data mean both that needs within the State are greater than in other states, and that there are more opportunities for low-income households to benefit from installation of weatherization measures. In an order issued in June 2016, the NYS Public Service Commission described the energy burden that low-income households in the State currently face and established a policy that no household should have to pay more than 6% of their income for energy costs.

DOE requires states to provide an estimate of the energy savings that can be expected from the program, based on an algorithm that DOE provides; this is summarized in the following chart³.

1. New York State Energy Research and Development Authority, “Patterns and Trends. New York State Energy Profiles: 2001-2015”

2. US Energy Information Administration, “Weatherization Assistance Program Technical Memorandum Background Data and Statistics,” March 2010

3. “All funds” includes estimated owner investment and leveraged funds. “Savings after 15 years” is in 2017 dollars, and assumes 3% drop-off in savings per year.

| Estimated Energy Savings | | |
|---|---------------------|------------------------------|
| Source of Funds | DOE Funds | All Funds⁴ |
| Amount available | \$26,945,581 | \$86,245,502 |
| Average savings per unit | 29.3 mmBtu | 29.3 mmBtu |
| Value of savings per unit | \$657 | \$657 |
| Units to be weatherized | 7,000 | 7,000 |
| First-year savings, mmBtu | 217,410 | 217,410 |
| First-year savings, 2020 dollars | \$4,874,940 | \$4,874,940 |
| Savings after 15 years, mmBtu | 2,657,780 | 2,657,780 |
| Savings after 15 years, 2020 dollars | \$59,595,948 | \$59,595,948 |
| Average cost per unit | \$2,397 | \$7,000 |
| Benefit/cost ratio | 2.70 | 2.70 |

The Oak Ridge National Laboratory (ORNL) sponsored an evaluation of the Weatherization program to determine energy savings and other impacts in assisted units. Data collection for that study was completed in 2011, and the results were released in 2015. The evaluation showed that the program is most effective in cold climates like New York's, and that providing weatherization assistance to large multifamily buildings in New York City also provides substantial savings. The study found that "whole-house" weatherization of gas-heated buildings in cold climate states reduced gas usage by 24% when heating system work is not included and 38% when heating systems are replaced. The multifamily study found savings of more than \$263 per unit annually in gas-heated buildings, and more than twice that amount in oil-heated buildings.

Other studies, including a 2010 study of assisted multifamily buildings in New York City sponsored by Deutsche Bank⁵ (which was primarily comprised of buildings assisted by the Program), have found savings in excess of 20%, compared to pre-weatherization energy use. Since multifamily buildings account for more than half of the units our program assists each year, these data are encouraging. Together, these findings suggest that in New York State, the DOE algorithm (and so, the data included in the above table) significantly underestimate the actual savings that accrue from New York's program.

IV.4 Leveraging and Coordination with Other Programs

Subgrantees provide a variety of services for low-income clients as a part of their overall mission, and they are adept at leveraging other resources to coordinate with weatherization services. Most put together a package of services to assist low-income clients with other housing and social service needs as part of providing Program services. HCR actively supports leveraging and coordination with other programs to supplement funding for the Program.

4. Includes all Federal funds plus an estimated \$15,800,000 in owner contributions and other leveraged funds.

5. "The Benefits of Energy Efficiency in Multifamily Affordable Housing," Deutsche Bank Americas Foundation web site, January 10, 2011 http://www.db.com/usa/content/en/ee_in_multifamily_underwriting.html

DOE guidance permits grantees to use a portion of the grant to undertake leveraging activities, to generate additional non-Federal resources for Weatherization. HCR intends to use Program funds for this purpose in 2020. HCR estimates that subgrantees will leverage approximately \$10.1 million in other funds in 2020, including \$5.7 million in owner contributions, which DOE excludes from its definition of leveraged funds.

The New York State Public Service Commission will continue to implement the energy initiative known as Reforming the Energy Vision, or REV, to address challenges to the energy industry brought about by aging infrastructure, increasing use of distributed energy resources, climate change and other factors. REV is intended to reform the regulatory environment and transform markets for efficiency and renewables. The Commission recognizes that low-income residents are particularly vulnerable to these challenges and has ordered that REV and related proceedings address low-income needs. In response, New York State Energy Research and Development Authority (NYSERDA) has instituted a Clean Energy Fund that will address these issues, including initiatives that target low-income residents.

- HCR is working with the Commission, NYSERDA and other agencies to help ensure that needs of low-income clients are addressed through coordination of the Program with other funds and programs where possible, and to streamline delivery of all low-income programs available in the State. The following are examples of leveraging efforts HCR currently supports:
- New York supplements weatherization with a transfer of a portion of its allocation of HEAP funding. In program year 2020, HEAP funds are expected to provide more than 60 percent of the funding for the Weatherization Assistance Program in New York.
- NYSERDA administers several efficiency programs that assist low-income households and provides additional opportunities for subgrantees to leverage Program funding. The additional services provided through these programs include electric reduction measures such as energy-efficient appliance replacement, lighting replacement and retrofits, electric domestic water heater measures, cooling usage reduction, energy-efficient motor replacement and retrofit, and energy education activities. New York is committed to providing additional support to mitigate the impact of changing energy markets on low-income households.
- WAP will partner with the New York State Housing Trust Fund, which is allocating up to \$7 million to target certain types of housing portfolios that are considered a priority for HTFC, specifically its Section 8 Performance Based Contract Administration portfolio. This initiative, called Weatherization Preservation Plus (P+), will combine designated state funds for physical building improvements with WAP energy efficiency upgrades in buildings identified as needing deep, comprehensive retrofits. \$2 million has been set aside from WAP funds for P+ and additional funds may be added as needed. (See Appendix C.)
- Although mandatory owner contributions are not considered leveraged funds by DOE, New York's owner investment policy is expected to generate more than \$10 million in owner investments during Program Year 2020.
- An interagency referral program has been established in conjunction with the New York State Office of Temporary and Disability Assistance (OTDA), the State Office for the Aging, and local departments of social services and area aging agencies. These

agencies will be encouraged to continue to refer clients to subgrantees for priority service. This program reduces subgrantee overhead since some of the referred clients are considered categorically income eligible, since they have already been determined eligible for other programs such as HEAP, and provides access to other programs administered by the two agencies.

- OTDA operates an emergency heating repair/replacement program for HEAP clients, and HCR encourages subgrantees to coordinate with that program, when possible. This work can expand the scope of services to low-income households, to provide additional opportunities to reduce heating expenditures and address health and safety concerns for this population.
- HCR has initiated an enhanced health and safety effort to promote coordination between Program subgrantees, state and local health departments and administrators of housing rehabilitation and lead hazard control programs. This initiative, aligned with the national Healthy Homes initiative, is expected to provide additional benefits to assisted households and may provide additional funding opportunities for subgrantees.
- HCR has implemented a program that targets smaller buildings owned by New York City Housing Authority in Brooklyn and Queens. This initiative will continue in PY 2020. The work is being done in conjunction with a demand-management program offered by Consolidated Edison, intended to reduce peak load in vulnerable parts of those boroughs.
- HCR's Office of Housing Preservation is also increasing coordination of Program resources with the HCR Office of Community Renewal to provide comprehensive weatherization services and additional repair and rehabilitation work through the HOME Program. Local HOME Program Administrators are now required to coordinate with subgrantees when funding rehabilitation of income-eligible buildings. In turn, those subgrantees will be asked to work with local HOME administrators to target properties where an expanded work scope is necessary to avoid deferral of a unit due to health and safety conditions that cannot be addressed with Weatherization funds.
- The State has convened an Interagency Task Force on energy needs composed of HCR, the Department of Public Service, OTDA, NYSERDA and the Governor's Office for Energy Finance. The Task Force is developing strategies to address energy affordability within the State, to achieve the goals of the NYS Climate Leadership and Community Protection Act, and to utilize disparate funding streams in a coordinated, targeted fashion to more holistically address the energy needs of low-income communities and improve outcomes for low-income households.

IV.5 Public Hearings on the State Plan

Pursuant to 10 CFR Part 440.14 (1), HCR followed a public process to receive input on the proposed State Plan. Prior to the issuance of the draft Plan, all current subgrantees and the Policy Advisory Council were given the opportunity for input towards its development. A public hearing on the 2020 State Plan was held on January 9, 2020, with public notice provided more than 10 days prior to the hearing date. The hearing was conducted by video conference to enable speakers to present testimony from HCR's Albany, Buffalo, Syracuse and New York

City offices. Copies of the hearing notice were distributed and made available on the HCR web site at <http://www.hcr.ny.gov>.

Copies of the proposed State Plan were emailed to all current subgrantees and to other interested parties and made available for inspection at the hearing locations and directly from Homes and Community Renewal, Weatherization Assistance Program, 38-40 State Street, Albany, New York 12207. The draft Plan was available on the HCR web site at <http://www.hcr.ny.gov>, as is the final version. Comments on the plan were accepted through the date of the public hearing.

IV.6 Miscellaneous

Policy Advisory Council

Pursuant to 10 CFR Part 440.17, HCR has established a Policy Advisory Council (PAC) to assist in the development and operation of the Program and provide advice in the development of the State Plan. The PAC is broadly representative of subgrantees, energy advocates, State agencies, and other organizations that represent low-income persons in New York. PAC members are well-versed in energy and housing issues. A list of current PAC members and their affiliation is included in the Annual File. During the program year, the PAC will meet quarterly, with agendas covering a range of issues of concern to subgrantees, low-income clients, and program partners. HCR typically provides updates on funding, program rules, coordination with other programs, and related issues at PAC meetings. When needed, additional meetings will be scheduled.

Subgrantee Task Force

A Subgrantee Task Force, comprised of subgrantee weatherization directors and staff, has been established to provide opportunities for subgrantees to meet with their peers and HCR staff to discuss program implementation and identify and resolve any program concerns. Typically, three Subgrantee Task Force meetings are held in each region each year. In 2020 HCR will continue to provide subgrantees opportunities for input on program operations, including review of any proposed changes to the State Plan and the Policy and Procedures Manual, and to propose actions in response to the results of the American Customer Satisfaction Index (ACSI) survey of subgrantees that was conducted on DOE's behalf in 2019.

New York State WAP has begun addressing issues raised in the 2019 ACSI. Since the widespread issue raised by the subgrantees was inadequate communication from the State to the subgrantees, the State has pledged to better inform the subgrantee network and PAC of proposed changes in policies and to seek their input in redrawing them. In developing policies, the State seeks to include the subgrantees in a more active role: for example, the PAC and subgrantees were given the opportunities to contribute to the development of the State Plan before the draft Plan was formed. The State has also begun sending policy directives that it receives from the DOE directly to the subgrantees. The State will more promptly provide its subgrantees critical information on funding, policy changes, and technical developments that they need for planning and budgeting.

A Steering Committee has also been established to target specific issues within the program and to make recommendations for improvements. The Committee is made up of representatives from the subgrantees state-wide and the training and technical assistance partners. It meets and addresses topics on an as-needed basis. This is another way HCR is addressing the concerns raised in the ACSI.

Section V - Program Management

V.1.1 Client Eligibility

Income definition

HCR has developed a rigorous process to ensure that assisted units meet the eligibility requirements of 10 CFR 440.22(a), with respect to income eligibility. These procedures are described in detail in Sections 3.05.01-06 of the NYS Weatherization Assistance Program Policy and Procedures Manual (PPM). Briefly, subgrantees are required to collect third-party documentation from each assisted household to confirm income and must keep documentation on file to support eligibility determinations. Some households are deemed categorically eligible based on documentation that they receive TANF, HEAP, SNAP or certain other forms of government assistance.

Income eligibility is verified using one of three methods, depending upon the type of building or whether the household is claiming categorical eligibility: 1) households that reside in buildings that have received assistance from certain HUD programs are considered eligible for Program assistance without additional documentation (pursuant to DOE Notice WPN 17-4); 2) households residing in any other building that claim categorical eligibility by participation in another assistance program that has eligibility requirements that are as restrictive as those of the Program must provide documentation from the administrator of the other program establishing participation; or, 3) all other households must provide third-party documentation of income (i.e., pay stubs, statements from income providers) to support income claimed.

Eligibility basis

HCR has adopted the income eligibility guidelines used in the State's HEAP Program as the standard for the Program for households with six or fewer persons. This limit – 60% of State median income – is higher in New York than the 200% of poverty option for households with fewer than seven persons, provides opportunity for participation by more households in the State and facilitates coordination with HEAP. For families of 7 or more persons, the 200% of poverty level is higher than 60% of State median income, and HCR sets the eligibility threshold for those households at the higher (200% of poverty) level. This threshold has been selected in accordance with Federal HEAP rules (Public Law 9735, Sec. 2605(b)(2)(B) and with 10 CFR 440.22(3)). Under these criteria, more than 3.5 million persons in New York State who reside in 2.1 million households are eligible for program services.

Qualified aliens

HCR's weatherization application form requires applicants to affirm that all members of the household are citizens or legal aliens entitled to receive federal government assistance.

V.1.2 Building Eligibility

Eligibility documentation

HCR requires that both household income eligibility and building eligibility are established before any work is done on a building. Building eligibility is confirmed prior to the start of an energy audit. Building owners must provide documentation to confirm ownership of the building to be assisted (such as tax payment receipts, copies of deed, or certain other forms).

Procedures for confirming eligibility in buildings with rental units and in certain other types of buildings are described below. More detail on building eligibility can be found in Section 3 of the PPM.

Historic Preservation

HCR has entered into a programmatic agreement with NYSERDA and the New York State Office of Parks, Recreation and Historic Preservation to facilitate historic reviews of projects assisted with Program funds. The agreement covers the 2020 Program Year.

Re-weatherization

Units assisted with Program funds after September 30, 1994 are not eligible for additional program assistance. In cases where a previously assisted unit has been damaged by fire, flood or other natural disaster, assistance can be provided with prior approval from HCR. Generally, assistance will only be provided to pay for damage not covered by insurance. HCR rules for re-weatherization can be found in Section 6.05 of the PPM.

Eligible structures

Program assistance is provided to all types of residential structures, including eligible single- and multi-family buildings, manufactured housing (mobile homes), group homes, homeless shelters, temporary housing facilities designed to transition persons with special needs into permanent housing, and mixed-use buildings that contain eligible residential units. Building eligibility requirements are detailed in sections three and four of the PPM. Only those structures that can be legally occupied as housing under New York State law, meet all other eligibility requirements and are in such condition that weatherization measures can be installed in a safe and effective manner are eligible for assistance.

HCR permits subgrantees to assist shelters and group homes; in those buildings, the cost per unit is calculated on a square-footage or per-story basis. In the case of eligible dwelling units which meet the definition of "shelter," dwelling units will be calculated based upon either (a) each 800 square feet of floor space; or, (b) each story of the building which is used as a living area.

Rental units and multifamily buildings

Most low-income people in New York State live in rental housing. While much of the rental housing stock is sound, and HCR has made considerable investment in decent, affordable housing, a large percentage of the units occupied by eligible households have significant need for energy efficiency investment. Rental housing provides significant opportunity to save energy, but assisting rental housing presents unique challenges.

HCR has extensive experience in providing weatherization assistance to rental buildings, including older masonry-construction centrally-heated multifamily buildings of the type common in much of New York City. Procedures that New York State developed for the Weatherization Program have helped form current DOE policy on assisting multifamily and other rental properties.

HCR requires subgrantees to obtain applications from each tenant in a rental project that has applied for Program assistance before investing any funds in the project (except for certain federally-assisted projects that are determined eligible following the procedures outlined in DOE Notice WPN 17-4). Subgrantees may only invest Program funds in rental buildings containing five or more units after they have established that 66% or more of the

dwelling units in the building are occupied by eligible households. In rental projects where the energy audit indicates that significant energy savings can be expected to result from Program assistance, and in buildings containing two, three or four units, at least 50% of the dwelling units must be occupied by eligible households.

For buildings that are determined eligible pursuant to WPN 17-4, subgrantees are required to retain the Property Occupancy Report for each building and confirming emails from HUD to demonstrate eligibility. For any multifamily building, the subgrantee may only count vacant units towards the 50% or 66% threshold when the building has been assisted by a Federal, State or local government program for rehabilitating the building or making similar improvements to the building and the units will become eligible dwelling units within 180 days following completion of the project.

HCR procedures also require that:

- Written permission of the building owner is received before any work commences;
- Benefits of Program assistance primarily accrue to the low-income tenants residing in the rental units;
- Qualified households in assisted buildings are not subjected to rent increases (unless those increases are demonstrable related to matters other than the weatherization work that was installed);
- Tenants and owners are notified in writing of their rights and the procedures tenants may follow to complain or appeal should improper rent increases occur;
- No undue or excessive enhancement of the value of the assisted building results from installation of weatherization materials with Program funds;
- Owners of assisted rental buildings agree in writing to restrictions on their use of the building after Program funds are invested; and,
- Owners of assisted rental buildings participate in the financing of weatherization activities, with certain exceptions, as described below.

In accordance with Federal rules and guidance intended to limit undue or excessive enhancement of the value of multifamily rental units resulting from investment of Program funds, HCR requires most owners of multifamily rental property to contribute to the cost of the weatherization work scope as a condition of receiving assistance. Generally, multifamily building owners must provide 25% of the total cost of the work to be done to meet Program standards, as follows:

- For multifamily buildings that do **not** meet the requirements for reductions in assessed valuation pursuant to Section 581-a of the New York State Real Property Law (typically, projects that are regulated as affordable housing) and which have fewer than five units, the owner must make an investment of no less than 25% of the estimated cost of completing the work scope, unless the building is occupied by the owner as his or her primary residence and the owner qualifies for WAP assistance as a low-income household.
- For multifamily buildings that do **not** meet the requirements for reductions in assessed valuation pursuant to Section 581-a of the New York State Real Property Law and which have five or more units, the owner must make an investment of no less than 25% of the estimated cost of completing the work scope. In cases where providing this level of investment will provide a hardship, or where a rental property is known to be in

financial distress, HCR may permit the subgrantee to reduce or waive the owner investment requirement, with prior approval by the HCR regional supervisor.

- For multifamily buildings that **meet** the requirements for reductions in assessed valuation pursuant to Section 581-a of the New York State Real Property Law, a reduced owner investment of 15% of the estimated cost of completing the work scope will be allowed to help maintain the supply of affordable housing in the State. HCR provides training, technical assistance and other support to maximize inclusion of assisted rental housing in the Program.

Owners of rental property who are eligible for the Program and occupy one of the units in the building to be assisted are not required to provide a financial or in-kind contribution towards the work scope.

HCR requires that subgrantees enter into a written agreement with owners of rental buildings that will receive Program assistance, using a form provided by HCR, before any funds are invested in a project. The agreement names tenants as third-party beneficiaries of the agreement, to establish certain rights. Tenants are provided with a synopsis (Form HCR-9) that explains these rights and the enforcement procedures. Naming the tenant as a third-party beneficiary provides the tenant with recourse in the legal system if a building owner violates the terms of the agreement. In practice, a letter reminding the owner of the terms of the agreement with the subgrantee is generally sufficient to resolve an adverse situation in favor of the tenant. This process reduces the need for monitoring by the State without placing undue burden on subgrantees or owners.

Subgrantees are monitored to ensure that low-income renters – particularly those living in smaller, privately-owned buildings – are provided with the same opportunity to access Program services as all other households. Additional information on subgrantee monitoring is provided in Section 5.8.3, below. More detail on rental housing procedures is included in Sections 3 and 4 of the PPM.

As indicated in V.5.1 below, HCR is in the process of updating its PPM, which may alter or eliminate some of these policies in the near future.

Deferral process

HCR prohibits subgrantees from investing funds in any building where legal, financial, structural or safety impediments exist that would compromise eligibility or place occupants or workers in an unsafe or unhealthful situation. Section 6.01 of the PPM (“When Not to Weatherize”) lists 16 common situations that may warrant deferral and provides subgrantees with guidance on how to handle those situations. When a subgrantee determines that assistance must be deferred for health or safety reasons, they must issue the HCR Health and Safety Notice (Form HCR-15) and obtain signatures of the owner and occupant on the form, if possible. The subgrantee is also expected to inform occupants and owners of any resources that may be available to resolve the problem.

In cases where assistance to a unit is deferred for other reasons (such as a pending sale) subgrantees are required to notify the owner and any affected tenants in writing and inform them that the application will be kept active for a specified period or until the issue is resolved, whichever comes first.

V.1.3 Children, Definition of

The Federal Weatherization Program rule provides flexibility in the definition of “children” for purposes of determining household eligibility and requires states to specify the age at which dependents are considered “children” for this purpose. Consistent with this guidance and past practice, New York will define children as dependents not exceeding 17 years of age. This definition will help more households in need of assistance to qualify.

V.1.4 Tribal Organizations

Assistance is made available to all low-income residents of the State without regard to tribal organization status, to the extent that funding is available. Additional funds are allocated to counties with large Native American reservations.

V.2 Areas to be Served

All areas of the State will be served. HCR allocates funding for each county in the State using a formula that considers climate and share of low-income households. Funding is also reserved to provide a minimum allocation to ensure service to each county where the formula does not otherwise generate sufficient funding to feasibly operate a program.

HCR designates a subgrantee to provide weatherization services in each county in the State. In urban areas, subgrantee service areas are typically a portion of a county, while in rural areas subgrantee service areas often cover one or more entire counties. Each community in the State is served by one, and only one subgrantee.

Housing in New York is generally older than elsewhere in the nation. According to the US Census, more than 5.6 million housing units in New York were built before 1970. That’s nearly 70% of the State’s total housing stock. Nationally, just 41% of the housing stock was built before 1970. This means that most housing in the state was built at a time when energy costs were low and modern energy-efficiency construction methods were not used.

New York’s households are also more likely to live in rental housing than in any other state. Census data shows that 45.5% of the occupied housing units in the State are rental. Most households in New York that are eligible for weatherization assistance live in rental housing. While 20% of the State’s owner households have annual incomes less than \$35,000, more than 50% of the State’s renter households have annual incomes less than \$35,000.

Households with incomes below the poverty level are especially likely to live in rental housing and to live in older units. While just five percent of owner households have incomes below the federally-established poverty level, fully 24% of renter households have incomes at this level, and 77% of those households live in housing built before 1970.

Census data also show that utility-supplied gas is the most commonly used fuel. About 57% of owner households and 54% of renter households heat with utility gas. About 28% of households in the state heat their homes with oil, but households in rental units are far more likely to heat with expensive electricity than owner households. More than 70% of all units that heat with electric are rental units; these units are home to more than 510,000 households. Our experience suggests that electrically-heated rental units are often located in multifamily housing built in the 1960s and 1970s. Given the high costs of electricity in New York, and the likelihood that many of those units were built using inferior energy conservation techniques, this is a significant concern.

There are regional differences in utility usage. Generally, Western and Central New York are more reliant on utility gas, and the Eastern parts of the State are more likely to use oil. For example, in the Buffalo Metropolitan Statistical Area (MSA), 89% of all housing units heat

with utility-supplied gas, but in the Albany MSA just 60% heat with gas. In New York City, which has a predominance of large multi-family buildings, about 39% of all units are heated with oil.

These regional differences are not consistent by tenure. While owners in Albany and Buffalo are about as likely to heat with gas as renters, in New York and Syracuse renters are much less likely to use gas, which means higher heating costs. In New York, more heat with oil, but in Syracuse more than 29% of all rental units are heated with electricity. In non-metropolitan areas, where more than 70% of all housing units are owner-occupied, oil and gas both account for about one-third of the fuel used in all units, and electrically-heated units are more common, especially among renter households.

These data, when considered together with New York State’s harsh climate and high energy costs, show that the needs for energy efficiency are different for rental and owner housing, and vary according to location. Because of this diversity, New York has developed procedures to target assistance to those most in need, using methodologies that are best suited to conditions within the State.

V.3 Priorities for Assistance

Priority for weatherization assistance is given to households with children, elderly persons and persons with disabilities. Priority is also given to applicants for assistance that pay more than 6% of their income for utilities and to households that receive assistance through the State’s Home Energy Assistance Program (HEAP). For the purposes of the Program, these applicants are considered High Energy Burden households.

HCR has established a referral process to facilitate assistance to households that are clients of local offices for the aging and county HEAP providers (typically departments of social services). HCR will continue to encourage subgrantees to prioritize assistance to properties where other State or Federal housing resources can be leveraged, where occupants of those properties also meet one or more of the other priorities listed above.

V.4 Climactic Conditions

The climate of New York varies from temperate coastal to cold mountainous conditions. Climate is a key element in the formula used for allocation of program funds. Climate severity is measured in degree days, which are an indicator of how much fuel will be necessary on any given day to maintain comfortable conditions in a home. Data on degree days is compiled on an annual basis by the National Climate Data Center. The allocation formula (see Section 2.1) uses 30-year averages for annual degree days to indicate the relative severity of climate in New York locations and its impact on low-income housing affordability.

| Average Heating and Cooling Degree Days 1971-2000 | | |
|--|----------------------------|----------------------------|
| Location | Heating Degree Days | Cooling Degree Days |
| Albany | 6860 | 206 |
| Buffalo | 6692 | 202 |
| New York City | 4754 | 604 |
| Plattsburg | 7817 | 132 |

| | | |
|--------------------|-------------|------------|
| Syracuse | 6803 | 195 |
| Long Island | 5357 | 371 |

Source: National Oceanic and Atmospheric Administration

Each DOE-approved energy audit that HCR uses considers climactic variances within the State to determine cost-effectiveness of measures proposed for individual buildings. Subgrantees analyze buildings using approved energy auditing software that includes region-specific data on climate. These data files are then considered in calculation of the savings-to-investment ratio for each measure.

V.5 Type of Weatherization Work to be Done

HCR permits subgrantees to conduct activities that are authorized by Program rules and guidance. Any material listed in Appendix A of 10 CFR Part 440 may be installed, provided the measure has been determined to be cost-effective pursuant to the protocols set forth by DOE, is based on an analysis of the building (see Section V.5.2, below) and can be installed in a safe manner without compromising the health or well-being of occupants of the dwelling unit. Generally, work conducted in assisted buildings includes air sealing, insulation, heating system repairs, window or furnace replacement, electric base load reduction measures, and work items that mitigate energy-related health and safety hazards. Other than health and safety work, only those measures with a savings-to-investment ratio of 1.0 or greater can be installed by subgrantees. In other words, the cost of installing an energy conservation measure in a building must not exceed the savings that can be expected during the expected life of the installed work.

HCR permits replacement of incandescent lighting with LED bulbs or fixtures as electric base load reduction measures, pursuant to approval received from DOE in 2015. Their use and implementation will follow established program protocols for lighting, including the requirement of meeting a savings-to-investment ratio (SIR) of 1.0 based upon an established minimum run time.

HCR encourages use of renewable energy systems, alternative energy sources, and other “green” practices in its housing and energy programs. HCR will consider installation of renewable energy systems and green building materials on a case-by-case basis, or as part of a pilot program when proposed by subgrantees. Installation of renewables will only be permitted when consistent with DOE guidance and justified by an SIR of 1.0 or greater, or by other allowable considerations. Any materials used must meet the specifications listed in 10 CFR 440, Appendix A, or otherwise be approved by DOE for use in the program. Subgrantees proposing installation of renewable energy systems will be required to obtain prior approval from the appropriate HCR regional supervisor. HCR will then obtain prior approval from DOE before authorizing any sub-grantee to use WAP funds for such measures.

Where feasible, HCR will encourage subgrantees to coordinate installation of weatherization materials with replacement of heating systems in buildings that can be converted from oil or other delivered fuels to natural gas or electric heat pumps. HCR is participating in an initiative sponsored by the NYS Public Service Commission to explore cost-saving opportunities associated with expansion of natural gas service to residences in the State that are not currently served by gas.

All weatherization activities not included in the list of Categorical Exclusion activities in Section 2.6 of WPN 17-1 will require an Environmental Questionnaire (EQ-1) submission for review.

WAP recognizes that many subgrantees rely on vehicles that have been in service for a long time and may be at or near the end of their useful life. In Program Year 2020, WAP encourages subgrantees to replace aged vehicles if necessary and will work with DOE to seek approval for replacements. Although the money spent on replacement vehicles reduces the amount available for weatherizing homes in the short term, this action will benefit WAP for several years by making subgrantee operations more efficient.

V.5.1 Technical Guides and Materials

Policy and Procedures Manual

The PPM sets forth specific guidelines that subgrantees must follow in administering the program. The PPM is an attachment to the written agreement between HCR and the subgrantee and subgrantees are bound by signing the agreement to comply with the PPM. Subgrantees that don't comply can be found to be in default of the agreement, and risk losing funding. The PPM covers administrative procedures; building and household eligibility; building analysis (energy audit) procedures, including health and safety protocols; deferral guidelines; reporting and payment procedures; and, procurement and fiscal requirements. Section 5 of the PPM also provides specific technical guidance to subgrantees on work standards and related protocols, including guidance on multifamily work scope development, building assessment and health and safety issues. The PPM is available on the HCR web site through the following link: <https://hcr.ny.gov/weatherization-providers#provider-information>. The PPM is being revised and updated for the 2020 Program Year.

Weatherization Field Guide

HCR has also issued the New York State Weatherization Field Guide for use by subgrantee crews and auditors. This field guide, which incorporates information from several different standards including the Standard Work Specifications for Home Energy Upgrades (SWS), provides on-site guidance to subgrantees in the installation of measures and other technical aspects of the program.

HCR updated the New York State Weatherization Field Guide in 2018 to meet requirements included in DOE guidance on maintaining work quality (WPN 15-4). The Field Guide is published through an agreement with Saturn Resource Management. A copyright protected version of the New York State Weatherization Field Guide is available to all NYS WAP subgrantees through the HCR Weatherization website: <https://hcr.ny.gov/weatherization>.

All subgrantees have been provided access to the Field Guide and are familiar with the specifications, objectives and desired outcomes outlined in the SWS for single family, multifamily and manufactured housing.

HCR will continue to provide subgrantees comprehensive field standards and training (see Section V.8.4, below) outlining requirements for work scope development and work quality that will meet or exceed the minimum standards found in the SWS. Subgrantees will also be provided with any revised technical requirements for building assessment (energy audits), installation of energy efficiency and health and safety measures and procedures for conducting final inspections in support of the quality work plan. These requirements will be referenced as a part of the agreement with each subgrantee to provide a mechanism for

compliance.

Subcontractor Agreements

Subgrantee agreements and vendor contracts contain language which requires them to comply with the SWS specifications for work quality outlined in WPN 15-4, Section 2. Section 4 of the PPM requires Subgrantees that use subcontractors to complete work on assisted buildings to follow the procurement procedures contained in Section 8 of this manual and to execute an agreement with each subcontractor for the specific work to be completed. Subgrantees that subcontract for work performed with WAP funds must use the Subcontractor Agreement (**Form #33**). This form binds the parties to follow HCR rules in completing WAP-funded work and provides for certain rights and remedies in the event of default or non-performance by a subcontractor. Subgrantees are responsible for ensuring that the provisions of the Subcontractor Agreement are enforced. Subgrantees may not enter into side agreements with subcontractors for work on a project where WAP funds are invested. Contractors acknowledge the expectations for work quality by signing Form #33.

V.5.2 Energy Audit Procedures

Weatherization subgrantees in New York can use the **Targeted Investment Protocol System** (TIPS) energy audit to analyze building energy usage and set priorities for weatherization work in all one- to four-unit buildings, including manufactured or mobile homes, as well as for auditing individually heated units in multi-family buildings not exceeding 25 units in size. The **Energy Audit Using the Queens Information Package** (EA-QUIP) may be used for analysis of multi-family buildings. Both audit platforms were reauthorized by DOE in 2017 for continued use in the NYS WAP.

New York also has DOE approval for use of the **Targeted Residential Energy Analysis Tools** (TREAT) Energy Audit for multi-family buildings. The TREAT software can be used in coordination with NYSERDA energy efficiency projects. Subgrantees doing weatherization work in multi-family buildings participating in NYSERDA programs, or that have had TREAT audits conducted for other programs, can rely on TREAT for Weatherization to avoid the need for duplicate audits. TREAT was also reauthorized by DOE in 2017 for continued use in the NYS WAP.

HCR subgrantees are expected to maintain in-house capacity to conduct building analysis for one- to four-unit buildings and are encouraged to develop capacity to conduct multifamily audits on certain types of buildings with fewer than 75 units. HCR has implemented a quality control and review process for subgrantees that are designated to conduct their own multifamily audits.

HCR encourages the use of renewable energy systems in weatherization projects where permitted by DOE rules. Particularly in multifamily projects, there are significant opportunities for energy savings and cost reduction that result from installation of systems such as solar thermal technology. The TREAT and EA-QUIP energy audit platforms provide the ability to determine cost-effectiveness of renewable energy systems that may be considered in a weatherization project. HCR will comply with the provisions of DOE notices WPN 20-1 and WPN 16-8 and with sections 10 CFR 440.18 and 440.21c concerning use of renewables in weatherization projects.

V.5.3 Final Inspections

All weatherization projects completed by subgrantees in New York must pass a quality control (QC) inspection performed by the subgrantee's designated QC inspector before being reported to HCR as completed. Payment for a completed unit will only be made for units that meet all program requirements (see sections 2.17, 7.02 and 7.06 of the PPM). HCR field staff periodically visit subgrantees and inspect a sample of dwelling units to ensure that the units reported have been completed in accordance with all State and federal program requirements. More detail on the monitoring process can be found in Section V8.3. Each completed unit is inspected per DOE Quality Work Plan requirements by the subgrantee before HCR reports the unit as complete to DOE. The following procedures will support HCR compliance with DOE Quality Work Plan requirements.

During Program Year 2020 every DOE WAP unit reported as a completed unit will receive and pass a QC inspection, performed by a certified QC inspector, ensuring that all work meets the minimum specifications outlined in the SWS in accordance with 10 CFR 440 and NYS WAP requirements. Each client file will have a form(s), signed by the QC inspector, certifying that the unit passed a QC inspection, meeting the required standards for NYS WAP. HCR will confirm subgrantee compliance with the QC requirement during routine monitoring visits and final quality assurance inspections of a sample of completed projects pursuant to WPN 15-4, which requires 10% QC review by HCR if the auditor who performed the energy audit also performed the QC inspection, and 5% if the QC inspection was done by an inspector who was not the energy auditor and did not perform work on the home.

The final quality assurance project inspection includes the following:

- verification of program eligibility and required project file documentation
- review of the audit and work scope to determine that the work specified was eligible, effective, installed per SIR priority and that any changes to work orders were approved in advance and properly documented;
- photographs of initial conditions and completed work;
- verification of the quantity of materials installed;
- verification that installation standards and work quality is acceptable and meets the QC inspection standard;
- a blower door test to verify final air flow, in units where the test can be conducted;
- verification that required health and safety tests were conducted accurately and that appropriate mitigation measures were performed as necessary;
- review for client signatures accepting completion of work;
- review for program documentation notifying owners and occupants of any unsafe or potentially unsafe conditions; and,
- review of any additional documentation necessary to support the outcome of the weatherization project.

Each subgrantee has certified quality control inspectors on staff, but turnover has been high, with several instances of staff leaving a subgrantee after obtaining QC certification. In cases where a subgrantee temporarily does not have a certified QC inspector in place, the subgrantee must demonstrate to HCR that it has arranged to obtain the services of a certified inspector on a temporary basis, typically by contracting with a nearby subgrantee, and must provide HCR with a plan to fill the vacancy. In any case, HCR does not allow a subgrantee to report a unit as complete without a QC inspection and will ultimately disallow costs for any expenditures on units that do not meet the QC requirement.

HCR permits smaller subgrantees that do not have the resources to hire a separate QC inspector to assign this function to an auditor or other staff person that obtains the required certifications. HCR increases monitoring frequency where needed, but for all subgrantees HCR inspects a minimum of 5% of completed units. See section V.8.3 for more detail on monitoring policies, including actions taken when a QC fails to adequately inspect completed work.

V.6 Analysis of Effectiveness

HCR conducts an analysis of the effectiveness of each subgrantee's program each year, per 10 CFR 440.14(c)(6)(1) and maintains documentation on this analysis on file for review. This analysis is based on frequent on-site monitoring, regular desk audits and management reviews as well as other available information. Subgrantee productivity is measured by reviewing subgrantee production (as reported in the Weatherization Payment and Reporting Database) against contract production schedules each month when subgrantees request payment. HCR's Field Operations unit also conducts comparative analyses to ensure that all subgrantees are administering the Program in an optimal manner and to set priorities for training and technical assistance. Subgrantees with deficiencies are required to submit corrective action plans to resolve impediments to effectiveness.

Subgrantees are also monitored several times during the program year, and their progress in resolving deficiencies and in implementing new procedures and recent training is assessed as part of the monitoring process. The field monitoring instruments themselves allow the reviewer to identify reoccurring problems and problem areas measured in the aggregate. Progress in resolving management findings and unresolved issues from prior annual evaluations is also assessed.

In addition to regular monitoring, HCR conducts a comprehensive annual evaluation of each subgrantee. The evaluation covers both the Program and Fiscal components of the agencies' programs and includes the following:

- Program Administration
- Outreach and Intake
- Energy Auditing and Work Scope Development
- Crew Operations/Subcontractor Management
- Post Inspection
- Database and Reporting
- Leveraging and Coordination
- Production and Quality
- Fiscal Record Keeping
- Financial Stability
- Program Compliance
- Procurement

The evaluation analyzes the program and fiscal monitoring reports documented during the year and various production metrics. The completed evaluation is shared with each subgrantee, and each area rated as "non-compliance" or "does not meet NYS WAP program standard" requires the subgrantee to submit a written corrective action plan, the implementation and progress of which is reviewed and monitored during the following year for effectiveness. Each evaluation area is also reviewed by the regional supervisors, program

monitors and fiscal monitors for the identification of problem areas and potential solutions. The scores and subgrantee rankings are compiled for the program management staff to determine the strength of subgrantee performance and any service territories whose needs are not being adequately met.

V.7 Health and Safety

The primary goal of the Weatherization Assistance Program is energy conservation. However, installing energy conservation measures sometimes requires subgrantees to address health and safety problems that may exist in client's homes. If not done correctly, installing certain measures can also create or worsen other health and safety conditions.

Many of the buildings that are weatherized in New York have serious deficiencies that can affect the health and safety of both occupants of assisted units and staff performing weatherization work. Health and safety work is only done in units where energy efficiency measures are also being installed. Section 5 of the PPM includes guidance on health and safety protocols. Specific information on HCR health and safety protocols is included in the HCR Weatherization Health and Safety Plan, which is attached as Appendix D that addresses the below sections under Health and Safety.

V.7.1 Health and Safety Budgeting

See Appendix D.

V.7.2 Health and Safety Measures and Incidental Repairs

See Appendix D.

V.7.3 Health and Safety Expenditure Limits

See Appendix D.

V.7.4 Deferral Policy

See Appendix D.

V.7.5 Occupant Health and Safety

See Appendix D.

V.7.6 Documentation of Health and Safety Issues

See Appendix D.

V.7.7 Health and Safety Hazards Addressed by HCR Subgrantees

See Appendix D.

Air Conditioning and Heating Systems

See Appendix D.

Appliances and Water Heaters

See Appendix D.

Asbestos

See Appendix D.

Biological Hazards and Unsanitary Conditions

2020 Weatherization State Plan

See Appendix D.

Building Structure and Roofing

See Appendix D.

Code Compliance

See Appendix D.

Combustion Gases and Fuel Leaks

See Appendix D.

Drainage

See Appendix D.

Electrical Issues

See Appendix D.

Fire Hazards

See Appendix D.

Formaldehyde, Volatile Organic Compounds and other Indoor Air Pollutants

See Appendix D.

Gas Ovens/Stovetops/Ranges

See Appendix D.

Injury Prevention and Worker Safety

See Appendix D.

Lead-Based Paint

See Appendix D.

Mold and Moisture

See Appendix D.

Occupant Health Conditions

See Appendix D.

Occupational Safety and Health Administration Compliance

See Appendix D.

Pest Infestation

See Appendix D.

Radon

See Appendix D.

Refrigerants and Other Hazardous Materials

See Appendix D.

Smoke and Carbon Monoxide Detectors and Fire Extinguishers

See Appendix D.

Solid Fuel Heating

See Appendix D.

Space Heaters

See Appendix D.

Ventilation and Indoor Air Quality

See Appendix D.

Window and Door Replacement and Window Guards

See Appendix D.

V.8 Program Management

V.8.1 Overview and Organization

The Program is managed in New York by the Division of Housing and Community Renewal (DHCR), a component of NYS Homes and Community Renewal (HCR). The Commissioner of Housing and Community Renewal also serves as Chief Operating Officer of HCR and is appointed by the Governor. Within DHCR, the Program is in the Office of Housing Preservation (OHP). OHP is headed by a deputy commissioner/president that reports to an executive deputy commissioner. In addition to the Weatherization program, OHP administers the Federal Housing Choice Voucher program and provides supervision of the State's portfolios of public housing and privately-owned assisted housing. Other offices within HCR include Finance and Development, which primarily administers multifamily housing finance programs such as the Housing Trust Fund, Low-income Housing (tax) Credit and Mortgage Revenue Bond programs, and the Office of Community Renewal, which administers the Community Development Block Grant Program, NYS HOME Program, NY Main Street program and other locally-administered housing and community development programs.

The Director of Energy and Rehabilitation Programs, who reports to the Deputy Commissioner for OHP and the Director of Sustainability, has day-to-day responsibility for the Weatherization Assistance Program. Three component units within the Energy and Rehabilitation Services Bureau provide Program staffing: Program Management, which includes central office operations such as contract and payment processing, reporting, budgeting and coordination with other State offices and other units within HCR; Fiscal Compliance, which includes staff that monitors the fiscal operations of subgrantees; Field Operations, which includes both the field (program) monitoring staff; and the Training and Technical Assistance unit.

HCR coordinates closely with other State agencies that administer energy assistance programs. These include the New York State Energy Research and Development Authority, which administers the State Energy Program and several energy efficiency programs, the Office for Temporary and Disability Assistance, which administers the Low-Income Home Energy Assistance Program, the Department of State, which administers the Community Services Block Grant program, the Public Service Commission, the Department of Labor, the State Office for the Aging and others.

A full description of roles and responsibilities of HCR staff involved in administration of the Program, including information on coordination with other State agencies, can be found in the Weatherization Assistance Program Policy and Procedures Manual.

V.8.2 Administrative Expenditure Limits

HCR will retain a portion of available funds to cover staff and non-personal service costs, not to exceed five percent of the allocation. Each subgrantee will be allowed to use six percent of the first \$1,500,000 of their allocation, and five percent of the balance of the allocation for administrative costs. For example, a subgrantee with an allocation of \$1,000,000 would be allowed to use up to \$60,000 of the allocation for administrative costs, and a subgrantee with an allocation of \$2,000,000 would be allowed to use up to \$115,000 for administrative costs $((\$1,500,000 \times .06) + (\$500,000 \times .05))$.

V.8.3 Monitoring Activities

HCR combines rigorous field monitoring with an extensive training and technical assistance program to identify areas to improve work quality and the delivery of program services as well as to correct subgrantee administrative and management problems. Field monitoring also provides an opportunity for on-site training and technical assistance and the identification of areas where more extensive training is needed.

In accordance with WPN 15-4, a minimum of 5% of units completed by each subgrantee are inspected by HCR QA monitors. For subgrantees that use energy auditors to perform QCI inspections on buildings they have audited, HCR will comply with DOE minimum monitoring requirements and inspect at least 10% of completed units. When deficiencies are found at a subgrantee, a higher percentage of units may be inspected.

Staff closely monitors compliance with Program policies and procedures and in accordance with WPN 20-4. Fiscal Compliance unit staff (senior accountants) performs periodic on-site monitoring and desk audits, including reviews of financial statements, to assure compliance with all financial rules. Field Operations unit staff reviews subgrantee production status throughout the year, conducts visits to subgrantee offices to review files and visits assisted units to inspect in-progress and completed work. This information aids in early identification of subgrantee problems and ensures quality work and compliance with Program standards.

The field monitoring process consists of monthly reporting by subgrantees, on-site visits by program and fiscal staff to subgrantee offices and to assisted units, and desk audits, where subgrantee performance reports and other information is reviewed. At the end of the program year an annual evaluation of each subgrantee is conducted that reviews compliance with all program rules, energy audit procedures, crew operations, client interaction, data collection and reporting and fiscal compliance.

Subgrantees found to have deficiencies in program operations are required to prepare a corrective action plan for areas needing improvement. HCR has developed an automated monitoring process to more carefully track monitoring results. This process has improved HCR's annual monitoring function, and will provide data on subgrantee performance, work quality and compliance that HCR can use in future funding decisions, and to improve program effectiveness in general. For more information on HCR subgrantee monitoring processes, see Sections 2.17 – 2.20 of the PPM.

When HCR monitoring finds that a unit reported as complete was not properly inspected,

current standards were not followed, or the unit otherwise contains deficiencies, the unit is not certified, which means that the subgrantee will not receive payment for the unit until the deficiency has been addressed. When a unit is not certified the HCR field representative notifies the subgrantee in a field visit report, documents the conditions that caused the unit to fail, and typically supports that finding with photographs that are included in the field visit report.

Since individual inspectors are employees or sub-contractors of the subgrantee, and HCR contracts with the subgrantee, not the individual, our written correspondence on these matters is directed to the responsible party at the subgrantee. It is the subgrantee's organizational responsibility to ensure that individuals perform in a manner that will result in compliance with HCR rules by the subgrantee. This is addressed in sections 2.17, 7.02 and 7.06 of the Policy and Procedures Manual; payment is only made for units that comply with all requirements.

Fiscal Field Monitoring

Fiscal monitors (HCR staff accountants) review subgrantee A-133 audits (single audits) submitted on an annual basis. A management review letter is issued to the subgrantee following review of the audit.

Fiscal monitors complete their monitoring summaries based in part on the summary of their last visit/report. If there were findings on that last report, the follow-up will be part of their monitoring for the current report. If the prior findings remain uncorrected, that will be reported again on the current report. If the condition is sufficient to warrant further action, the agency may be placed on Fiscal Special Conditions, whereby monitoring becomes more frequent and where special Fiscal signoff may be needed for payments.

For deficiencies reported on an agency's annual evaluation, monitors review the corrective action plan and follow-up during the year as to how successfully it has been implemented. Failure to correct deficiencies may warrant increased training and technical assistance, increased levels of monitoring, or in the most severe cases a formal warning notice which may lead to termination.

Program Field Monitoring

HCR Program Field Monitors typically perform on-site field visits to each subgrantee to assess subgrantee performance and inspect completed units between four and six times each year. A written report is generally issued to the subgrantee at the end of each visit, but in any case, no later than 30 days following the end of the visit. Where serious or repeated deficiencies are found, the frequency of monitoring may be increased. Each monitor possesses current EPA Renovate, Repair and Paint (RRP) lead paint certifications and NREL Quality Control Inspector certifications.

Grantee staff assigned to monitoring are paid with LIHEAP and DOE administrative funding. Four staff persons assigned to the Training and Technical Assistance unit are paid with DOE T&TA funds.

V.8.4 Training and Technical Assistance

HCR provides training and technical assistance to maintain and improve subgrantee performance and the quality of work installed with program funds. HCR is under contract with two training and technical assistance providers to help administer its program requirements: The Association for Energy Affordability and the NYS Weatherization Directors' Association.

Comprehensive training will be provided by IREC-accredited organizations that have extensive state-of-the-art training facilities that feature pressure diagnostic houses, heating labs, classroom space, and other resources.

Individual grantee staff independently track their continuing education units required for recertification via the BPI portal. HCR program field representatives review the status of subgrantee staff certification compliance during monitoring visits and will issue written findings to subgrantees that are not in compliance with certification requirements. See Sub Section 2.17 of the PPM for more information on HCR monitoring and field visits.

Required certifications and mandatory training are listed in Sub Section 2.14 of the PPM and communicated via program memo when necessary. Ongoing training is available through NYS WAP contracted technical service providers, who post training calendars on their websites and send out email notices to the WAP network regarding upcoming training.

When topics involve a change to existing WAP policy and procedures (e.g., air sealing standards, changes to audit protocols, etc.) or emphasize an important program area, (ASHRAE 62.2) subgrantee attendance may be mandatory. In this case, the subgrantee is required to assign the most appropriate person to attend.

If a sponsored training is regional in nature or is otherwise limited to a certain group of subgrantees, HCR will inform subgrantees if their attendance is required. If a subgrantee has any doubt regarding attendance, their HCR program field representative should be consulted.

The mandatory training sessions and the personnel required to take them are listed in the PPM, SS2.14. If a subgrantee hires a new employee into any of these positions or a current employee transfers into any of these positions, it is required that they receive the mandatory training within 12 months of their start date.

Training must be repeated every 3 years by subgrantee personnel who occupy these positions. Compliance with this program requirement will be monitored by field staff in their field visit reports. Any agencies that are not in compliance will be referred to the WAP T&TA unit (Form #47) to arrange for mandatory training for appropriate staff members. HCR Field Operations staff include monitoring of the subgrantee staff certifications and credentialing as part of their regular monitoring and include their findings on field visit reports.

Ramifications for non-compliance include: (a) critical program field visit report that would result in an agency having to provide a written action plan for compliance; (b) negative end of year agency evaluation; or (c) disallowing payment for units that were not inspected by a certified QCI. Any subgrantee or sub-contracted staff paid with weatherization funds must be supervised for any work activities until all training and certification requirements are met.

HCR also requires that subgrantee personnel in certain professional positions be certified by the Building Performance Institute (BPI). Subgrantees must ensure that any individual holding a staff position that requires certification must meet certification requirements no later than 18 months from the time they are assigned to the position. HCR does not require Subgrantees to make their hiring decisions based on program training or certification requirements.

HCR provides on-going training programs to keep subgrantees current in program requirements, including any that subgrantees need to comply with HCR's Health and Safety Plan. HCR requires subgrantees to comply with ASHRAE 62.2-2016 indoor air quality requirements and will ensure that staff and subgrantees receive continuing training and other

support throughout 2020, including training on any changes to the ASHRAE 62.2 standard that may impact the program. HCR will continue to attempt to balance these requirements with the need to maximize energy savings in assisted units and provide recipients with sustainable installations that they will be able to maintain in future years.

HCR distributes a portion of its T&TA funds directly to the subgrantees for their use in the following activities: conference attendance, staff training, memberships and subscriptions, computer/electronic media training resources, data gathering and client education materials. Also, since 2014 HCR has provided customer education and training documents for subgrantees to utilize for the purposes of customer education. These are available on the HCR web site.

Training consists of the following activities:

Activity 1: All subgrantee crews, supervisors, energy auditors and other key staff are provided with classroom, web-based and individual training covering all aspects of the program. Areas such as rules, regulations, policies, procedures, reports, data entry, and forms will be covered. This activity will be aimed at meeting and maintaining State and Federal program, fiscal, and technical standards. HCR will provide this training and technical assistance through assigned staff.

Activity 2: This activity corresponds to DOE Comprehensive (formerly Tier 1) training. Training of a distinct nature that includes comprehensive, job-specific training which follows a curriculum aligned with the NREL Job Task Analyses (JTAs) for the major energy upgrade job classifications, including the required Quality Control Inspector title. This training will be provided by IREC-accredited training providers under a technical services contract, in accordance with all program requirements for Comprehensive (Tier 1) training. HCR will provide Comprehensive (Tier 1) training opportunities on an ongoing basis, becoming more varied as needs are assessed, curriculums are approved, and accreditations acquired. Training providers will be required to hold IREC accreditations in the following NREL worker certification tracks:

Crew Leader

Quality Control Inspector,

Retrofit Installer

Energy Auditor

Activity 3: HCR will also fund other training and technical support services, including peer-to-peer training activities, air monitoring of lead safe practices, energy savings analysis, and specialized training activities to address deficiencies found in field monitoring. This activity corresponds to DOE Specific (formerly Tier 2) training.

Other required or approved training will cover topics such as Health & Safety, using the TIPS, TREAT, or EA-QUIP software, creating-cost effective job work scopes, infrared thermography, heating system diagnostics, performing post inspections, managing crews and subcontractors, materials installation, air sealing, and pressure diagnostics. The goal of this training is also to introduce or significantly improve the knowledge and expertise needed to successfully operate local programs and provide quality weatherization services. These training sessions will be provided throughout the year.

Activity 4: HCR will distribute a portion of its T&TA funds directly to the subgrantees for their use in the following activities: conference attendance, staff training, memberships and

subscriptions, computer/electronic media training resources, data gathering and client education materials.

Coordination of Monitoring and Technical Assistance

HCR utilizes field staff and technical service subgrantees as a quality assurance strategy. Field staff conducts an annual evaluation of each subgrantee's training needs that is used to develop the training curricula for the following year. HCR also has staff specifically assigned to provide specialized training in various administrative and support functions to both staff and subgrantees.

HCR has added the capability to capture per building type proposed energy savings data from each subgrantee in its database. This can now be utilized as an additional factor when developing a subgrantee training curricula.

Field staff visit subgrantees on a regular basis to monitor the progress of subgrantees on work required as part of their Program contract. During these monitoring visits, when staff observes areas where subgrantees need assistance, the individual staff member will provide the assistance needed or will arrange for other training as described in Activity 1 and Activity 3, above.

HCR has developed comprehensive written training curricula in several areas that have been used for the training of subgrantee staff on a regular basis. As the need arises for training in additional areas, curricula will be developed to insure a comprehensive and uniform approach to the subject matter. This includes required Lead Safe Worker Training, which is conducted by EPA-certified training contractors. HCR has also funded a Clean Boilers Program which qualifies heating system contractors as eligible bidders and establishes a Master Bidders List for multi-family heating systems installed within the weatherization program.

The annual evaluation process described in Section V.6, above, is used to evaluate subgrantee effectiveness in several technical areas, and then HCR technical assistance and program operations staff reviews the results of the evaluations to identify underperforming subgrantees and recommend them for specific training or technical assistance to address the deficiencies.

Client education is primarily the responsibility of the subgrantee. HCR has developed a set of client educational materials to aid subgrantees in this effort. Those materials are on the HCR web site.

V.9 Energy Crisis and Disaster Relief

In the event of a natural disaster during the program year, subgrantees that serve areas that have been designated as federal disaster areas will be required to prioritize service to buildings occupied by disaster victims. In some cases, subgrantees covering adjacent areas will be allowed to perform work in disaster areas, with the consent of the subgrantee that primarily serves that area. Work will be limited to allowable Program measures.

APPENDIX A - Policy Advisory Council

Barden, Joseph
Margert Community Corp.

Brennan, Charles
Attorney at Law

Bryk, Andrew
NYS Office of Temporary and Disability
Assistance

Coll, Christopher
NYS Energy Research & Development
Authority

Ferreri, Monica
NYS Department of Public Service

Hepinstall, David (Vice Chairperson)
Association for Energy Affordability, Inc.

Kamman, Avi
Crown Heights Jewish Community Council

Maggiore, Joseph
Delaware Opportunities, Inc.

Orr, Jacqueline
NYS Community Action Association

Padian, Andrew
Energy Efficiency Consultant

Petrosino, Linda
NYS Office for the Aging

Quinn, Charles
RECAP, Inc.

Rieber, Dan (Secretary)
Northern Manhattan Improvement Corp.

Rice, Wendell
Bedford Stuyvesant Restoration Corp.

Spira, Elizabeth
Community Action Partnership for
Dutchess County

Stone, Andrew
NYS Weatherization Directors'
Association

Ward, Sally
PEACE, Inc.

Zales, JoAnn
National Grid

Zerbian, Tina
Cattaraugus Community Action

Appendix B

Weatherization Assistance Program Allocation Formula

| County | Income-Eligible Households | | Degree Days * | | Allocation Percentage |
|-------------|----------------------------|----------------------|---------------|--------|-----------------------|
| | County Total | Share of State Total | County Total | Index | |
| Albany | 38,906 | 1.6467 | 7,148 | 1.0182 | 1.9979 |
| Allegany | 8,009 | 0.3390 | 7,871 | 1.1212 | 0.4529 |
| Bronx | 239,738 | 10.1471 | 4,901 | 0.6981 | 8.4412 |
| Broome | 32,509 | 1.3760 | 7,134 | 1.0162 | 1.6662 |
| Cattaraugus | 13,524 | 0.5724 | 7,419 | 1.0568 | 0.7208 |
| Cayuga | 11,669 | 0.4939 | 7,041 | 1.0030 | 0.5903 |
| Chautauqua | 24,126 | 1.0212 | 6,539 | 0.9315 | 1.1334 |
| Chemung | 14,512 | 0.6142 | 7,134 | 1.0162 | 0.7438 |
| Chenango | 7,633 | 0.3231 | 7,326 | 1.0436 | 0.4017 |
| Clinton | 11,725 | 0.4963 | 7,831 | 1.1155 | 0.6596 |
| Columbia | 7,847 | 0.3321 | 6,748 | 0.9613 | 0.3804 |
| Cortland | 6,720 | 0.2844 | 7,637 | 1.0879 | 0.3687 |
| Delaware | 8,115 | 0.3435 | 7,327 | 1.0437 | 0.4272 |
| Dutchess | 25,413 | 1.0756 | 6,647 | 0.9469 | 1.2136 |
| Erie | 143,512 | 6.0743 | 7,137 | 1.0167 | 7.3584 |
| Essex | 5,910 | 0.2501 | 8,426 | 1.2003 | 0.3578 |
| Franklin | 7,972 | 0.3374 | 8,818 | 1.2561 | 0.5050 |
| Fulton | 9,519 | 0.4029 | 7,831 | 1.1155 | 0.5355 |
| Genesee | 8,202 | 0.3472 | 6,648 | 0.9470 | 0.3917 |
| Greene | 6,857 | 0.2902 | 7,646 | 1.0892 | 0.3767 |
| Hamilton | 788 | 0.0334 | 9,206 | 1.3114 | 0.0521 |
| Herkimer | 11,071 | 0.4686 | 7,926 | 1.1291 | 0.6304 |
| Jefferson | 17,335 | 0.7337 | 7,635 | 1.0876 | 0.9509 |
| Kings | 377,874 | 15.9938 | 4,902 | 0.6983 | 13.3077 |
| Lewis | 4,253 | 0.1800 | 8,522 | 1.2140 | 0.2604 |
| Livingston | 7,763 | 0.3286 | 6,939 | 0.9885 | 0.3870 |
| Madison | 8,670 | 0.3670 | 8,121 | 1.1568 | 0.5058 |
| Monroe | 101,710 | 4.3050 | 6,743 | 0.9605 | 4.9272 |
| Montgomery | 8,311 | 0.3518 | 7,527 | 1.0722 | 0.4494 |
| Nassau | 74,151 | 3.1385 | 5,488 | 0.7818 | 2.9236 |
| New York | 232,665 | 9.8477 | 4,900 | 0.6980 | 8.1905 |
| Niagara | 34,135 | 1.4448 | 6,748 | 0.9613 | 1.6548 |
| Oneida | 35,359 | 1.4966 | 7,634 | 1.0875 | 1.9393 |
| Onondaga | 64,924 | 2.7480 | 7,544 | 1.0746 | 3.5188 |
| Ontario | 13,088 | 0.5540 | 6,945 | 0.9893 | 0.6530 |

| | | | | | |
|--------------|-----------|----------|-------|---------|----------|
| Orange | 30,347 | 1.2845 | 6,079 | 0.8660 | 1.3253 |
| Orleans | 5,779 | 0.2446 | 6,546 | 0.9325 | 0.2718 |
| Oswego | 17,635 | 0.7464 | 6,745 | 0.9608 | 0.8546 |
| Otsego | 9,839 | 0.4164 | 7,723 | 1.1001 | 0.5459 |
| Putnam | 5,659 | 0.2395 | 6,081 | 0.8662 | 0.2472 |
| Queens | 244,408 | 10.3448 | 4,902 | 0.6983 | 8.6074 |
| Rensselaer | 20,253 | 0.8572 | 7,045 | 1.0036 | 1.0251 |
| Richmond | 41,756 | 1.7674 | 4,908 | 0.6991 | 1.4723 |
| Rockland | 20,567 | 0.8705 | 5,579 | 0.7947 | 0.8243 |
| St. Lawrence | 17,399 | 0.7364 | 8,429 | 1.2007 | 1.0536 |
| Saratoga | 21,274 | 0.9004 | 7,336 | 1.0450 | 1.1212 |
| Schenectady | 18,837 | 0.7973 | 7,151 | 1.0187 | 0.9677 |
| Schoharie | 4,294 | 0.1817 | 7,428 | 1.0581 | 0.2291 |
| Schuyler | 2,769 | 0.1172 | 7,226 | 1.0293 | 0.1437 |
| Seneca | 4,906 | 0.2077 | 7,038 | 1.0026 | 0.2481 |
| Steuben | 16,175 | 0.6846 | 7,426 | 1.0578 | 0.8629 |
| Suffolk | 86,799 | 3.6738 | 5,265 | 0.7500 | 3.2832 |
| Sullivan | 11,024 | 0.4666 | 7,522 | 1.0715 | 0.5957 |
| Tioga | 6,605 | 0.2796 | 7,236 | 1.0308 | 0.3434 |
| Tompkins | 13,960 | 0.5909 | 7,136 | 1.0165 | 0.7157 |
| Ulster | 20,800 | 0.8804 | 6,447 | 0.9184 | 0.9634 |
| Warren | 9,823 | 0.4158 | 8,034 | 1.1444 | 0.5670 |
| Washington | 8,614 | 0.3646 | 7,138 | 1.0168 | 0.4417 |
| Wayne | 12,047 | 0.5099 | 6,647 | 0.9469 | 0.5753 |
| Westchester | 77,598 | 3.2844 | 5,690 | 0.8105 | 3.1721 |
| Wyoming | 5,359 | 0.2268 | 7,528 | 1.0724 | 0.2898 |
| Yates | 3,582 | 0.1516 | 6,942 | 0.9889 | 0.1786 |
| Entire State | 2,362,623 | 100.0000 | 7,020 | 61.9966 | 100.0000 |

Income Eligible Population based on 2010 American Community Survey data on distribution of low-income households

* Degree days = 100% of heating degree days and 10% of cooling degree days.

APPENDIX C
Weatherization Assistance Program
Subgrantee Allocations

| County (1) | Subgrantee | 2020 Allocation |
|--|--|------------------------|
| Albany | Albany Community Action Partnership | \$ 1,135,823 |
| Allegany (Cattaraugus County) | | |
| Bronx | Association for Energy Affordability, Inc. | \$ 2,359,278 |
| | Northwest Bronx Community and Clergy Coalition | \$ 2,439,504 |
| Broome (Tioga County) | | |
| Cattaraugus (Alleghany, Livingston, Wyoming) | | |
| | Cattaraugus Community Action Inc. (2) (3) | \$ 1,309,789 |
| Chautauqua | Chautauqua Opportunities Inc. | \$ 644,327 |
| Chemung (Schuyler) | Economic Opportunity Program of Chemung and Schuyler (2) | \$ 797,834 |
| Chenango | Opportunities for Chenango, Inc. | \$ 400,000 |
| Clinton (Franklin) | JCEO of Clinton and Franklin Counties (2) | \$ 775,000 |
| Columbia | Columbia Opportunities Inc. | \$ 400,000 |
| Cortland | Cortland County Community Action Program Inc. | \$ 400,000 |
| Delaware (Sullivan) | Delaware Opportunities Inc. (2) | \$ 775,000 |
| Dutchess | Community Action Partnership for Dutchess County | \$ 689,908 |
| Erie | Lt. Col. Matt Urban Human Services Center/PCCB | \$ 535,874 |
| | Neighborhood Housing Services of South Buffalo, Inc. | \$ 1,374,196 |
| | Supportive Services Corporation | \$ 2,273,176 |
| Essex | Adirondack Community Action Programs, Inc. | \$ 400,000 |
| Franklin (Clinton County) | | |
| Fulton (Montgomery) | Fulton/Montgomery Community Action (2) | \$ 775,000 |
| Genesee (Orleans County) | | |
| Greene | Community Action of Greene County Inc. | \$ 400,000 |
| Hamilton (Warren County) | | |
| Herkimer (Oneida County) | | |
| Jefferson | Community Action Planning Council of Jefferson County | \$ 540,558 |
| Kings | Bedford Stuyvesant Restoration Corporation, Inc. | \$ 1,622,770 |
| | Crown Heights Jewish Community Council | \$ 1,145,396 |
| | Opportunity Development Association | \$ 2,386,872 |
| | Sunset Park Redevelopment Committee | \$ 2,410,325 |
| Lewis | Lewis County Opportunities Inc. | \$ 400,000 |
| Livingston (Cattaraugus County) | | |
| Madison | Stoneleigh Housing Inc. | \$ 400,000 |
| Monroe | | |

| | | | |
|-------------------------------|--|----|-----------|
| | Action for a Better Community, Inc. | \$ | 1,322,392 |
| | Pathstone Corporation | \$ | 1,478,693 |
| Montgomery (Fulton County) | | | |
| Nassau (Suffolk County) | | | |
| New York | | | |
| | Housing Conservation Coordinators | \$ | 831,141 |
| | Northern Manhattan Improvement Corporation | \$ | 2,621,005 |
| | Harlem Community Development Corporation | \$ | 1,204,107 |
| Niagara | Niagara Community Action Program, Inc. | \$ | 940,772 |
| Oneida (Herkimer) | | | |
| | Mohawk Valley Community Action Agency (2) | \$ | 1,477,457 |
| Onondaga (Oswego) | People's Equal Action and Community Effort, Inc. (2) | \$ | 2,486,208 |
| Ontario (Wayne County) | | | |
| Orange (Rockland) | Regional Economic Community Action Program, Inc. (2) | \$ | 1,222,208 |
| Orleans (Genesee) | Orleans Community Action Committee, Inc. (2) | \$ | 775,000 |
| Oswego (Onondaga County) | | | |
| Otsego | Opportunities for Otsego Inc. | \$ | 400,000 |
| Putnam (Westchester County) | | | |
| Queens | | | |
| | Hellenic American Neighborhood Action Council, Inc. | \$ | 2,196,951 |
| | Margert Community Corporation | \$ | 1,369,887 |
| | Association for Energy Affordability, Inc. | \$ | 1,326,073 |
| Rensselaer (Washington) | CEO for the Greater Capital Region, Inc. (2) | \$ | 957,747 |
| Richmond | Northfield Community LDC of Staten Island | \$ | 837,014 |
| Rockland (Orange County) | | | |
| St. Lawrence | St. Lawrence County CDP, Inc. (3) | \$ | 623,977 |
| Saratoga (Schenectady) | Saratoga County Economic Opportunity Council, Inc. (2) | \$ | 1,187,567 |
| Schenectady (Saratoga County) | | | |
| Schoharie | Schoharie County Community Action Program | \$ | 400,000 |
| Schuyler (Chemung County) | | | |
| Seneca | Seneca County Office for the Aging | \$ | 400,000 |
| Steuben (Yates) | Pro Action of Steuben and Yates Inc. (2) | \$ | 865,579 |
| Suffolk (Nassau) | Community Development Corp of Long Island Inc. (2) | \$ | 3,528,513 |
| Sullivan (Delaware County) | | | |
| Tioga (Broome) | Tioga Opportunities Program Inc. (2) | \$ | 1,322,210 |
| Tompkins | Tompkins County Economic Opportunity Corporation | \$ | 406,864 |
| Ulster | Ulster Community Action Committee Inc. | \$ | 547,684 |
| Warren (Hamilton) | Warren/Hamilton Counties ACEO Inc. (2) | \$ | 775,000 |
| Washington (Rensselaer) | | | |
| Wayne (Ontario) (Cayuga) | Wayne County Action Program Inc. (3) | \$ | 1,033,856 |
| Westchester (Putnam) | Westchester Community Opportunity Program Inc. (2) | \$ | 2,178,318 |
| Wyoming (Cattaraugus County) | | | |
| Yates (Steuben County) | | | |

- (1) For counties that do not have an allocation listed, service is provided by the subgrantee assigned to the county in parentheses, and the allocation for both counties is included in that subgrantee's allocation.
- (2) Service area includes more than one county
- (3) Adjusted allocation includes additional funds for service to Native American Reservations.

