American Recovery and Reinvestment Act
Weatherization Assistance Program
Proposed Connecticut State Plan

I. Introduction

As a result of the American Recovery and Reinvestment Act of 2009 ("ARRA"), the State of Connecticut, Department of Social Services ("DSS"), the designated state grantee for the federal Weatherization Assistance Program for low-income people ("WAP"), will receive from the federal Department of Energy ("DOE") additional funding in the amount of **$64.3** million. These funds are temporary in nature and must be spent over a three-year period, beginning April 1, 2009 and ending March 31, 2012.

The ARRA funding is meant to stimulate the economy by creating new weatherization training programs and projects that will lead to new and sustainable green technology jobs. Connecticut anticipates weatherizing approximately 7,500 units. .

Up to 10% of the funding ($6.4 million) may be used for administrative purposes. From this amount, 5% ($3.2 million) may go to the subgrantees to oversee the operation and implementation of this program. In addition, although up to $11.8 million of the total funding may be used for training and technical assistance activities, if the state determines that there is already adequate funding to meet the state's training needs, this money may also be used for weatherization activities.

All funds must be spent in accordance with the DOE's regulations governing the WAP, which are found at 10 CFR § 440.1 *et seq.*

In accordance with 10 CFR § 440.15, DSS, as the grantee agency, must ensure that:

> (1) each subgrantee is a Community Action Agency ("CAA") or other public or non-profit entity;
> (2) each subgrantee is selected on the basis of public comment received during a public hearing pursuant to [10 CFR] § 440.14(a) and other appropriate findings regarding:
> - (i) the subgrantee's experience and performance in weatherization or housing renovation activities;
> - (ii) the subgrantee's experience assisting low-income persons in the area to be served; and
> - (iii) the subgrantee's capacity to undertake a timely and effective weatherization program.
>
> (3) In selecting a subgrantee, preference is given to any CAA or other public or nonprofit entity which has, or is currently administering, an effective program under this part or under title II of the Economic Opportunity Act of 1964.

DSS will follow all of the applicable federal regulations in its implementation of WAP.

II. Administration

DSS proposes to distribute these additional WAP funds to both existing WAP subgrantees that are in good standing with DSS (CAAs) and other public or private non-profit partners that have experience with training and/or serving the housing needs of low-income clients. By working with these existing subgrantees and new partners, DSS will be able to bring certain economies of scale to bear in the expenditure of these funds, especially in the areas of eligibility determination, program operation, oversight, training and technical assistance, recordkeeping and reporting.

The proposed ARRA WAP subgrantees are listed below:

- Action for Bridgeport Community Development, Inc. (ABCD) - Bridgeport
- The Community Renewal Team, Inc. (CRT) - Hartford & Middletown
- New Opportunities, Inc. (NO) - Waterbury & Meriden
- The ACCESS Agency, Inc. (ACCESS) - Willimantic
- Connecticut Department of Economic & Community Development (DECD)

The towns to be served by the proposed subgrantees are listed in Appendix 2 of this document.

In addition, we are encouraging the above-referenced CAAs (ABCD, CRT, NO and ACCESS) and DECD to use the other CAAs that are in good standing and have past experience with the WAP, work with low income clientele; and are knowledgeable of the needs in their catchment areas as temporary subcontractors to accomplish the work for which this funding was made available.

These temporary subcontractors include:

- TEAM, Inc. (TEAM) – Derby
- Human Resource Agency of New Britain, Inc. (HRA) – New Britain
- Norwalk Economic Opportunities Now, Inc. (NEON) – South Norwalk
- Thames Valley Council for Community Action, Inc. (TVCCA) – Jewett City
- CTE, Inc. (CTE) - Stamford

The proposed program training and recruitment partners are:

- Connecticut Department of Labor (DOL) / Workforce Investment Board (WIB)
- Community & Technical College Network (CCTC)/ Vocational Technical High School System
- Office of Workforce Competitiveness (OWC)

III. Program Eligibility

DSS proposes to use the eligibility determination process that is currently in use for the WAP, with some modifications as necessary with the DECD units. This system uses a single application process for all energy and weatherization assistance programs administered by DSS and operated by our CAA network.

DSS has been using 200% of the federal poverty guidelines ($42,400 for a household of four) as the income eligibility for WAP. DOE allows states to opt to use the LIHEAP eligibility income

limits and DSS is proposing to serve clients up to 60% of state median income ($56,293 for a household of four), to better coordinate services with the low-income weatherization programs offered by the major public utility companies and the Fuel Oil Conservation Board (FOCB) that serve customers up to 60% of state median income. Both homeowners and renters are eligible to apply.

In the case of renters, landlords must agree to the weatherization work and make a co-payment of 20 % of the material cost or a maximum of $500 per eligible dwelling unit, whichever is the lower amount. DSS shall have discretion to waive landlord contributions for vulnerable households (member who is elderly, disabled or under six years of age), or if the owner is income eligible for weatherization. Priority will be given to tenants who pay for their own heat. DSS has discretion to waive the owner co-payment based on individual circumstances on a limited basis.

Landlords who choose to participate in this program shall not increase the rent paid by tenants for a period of two years from the date the weatherization work is completed, unless the property owner can document that the increase is due to factors other than the weatherization assistance performed under this program.

Coordination with other Low-Income Weatherization Programs

DSS proposes to continue to coordinate ARRA WAP activity with other low-income programs to maximize services to eligible households. These other programs are listed below :

- WAP
- FOCB Low-Income Heating & Hot Water System Program
- Connecticut Light and Power (CL&P) Weatherization Residential Assistance Partnership (WRAP) Program
- United Illuminating (UI) Helps Program
- Municipal Utility Conservation Programs

IV. Allocation of Funds

DSS proposes to allocate the $64.3 million as outlined below:

CAAs*	**$ 28,500,000**
DOL/WIB/OWC	**$ 3,500,000**
CCTC/VOCTECH	**$ 1,500,000**
DECD	**$ 20,000,000**
Special Projects/Initiatives	**$ 7,100,000**
DSS (Admin/T&TA)	**$ 3,700,000**
TOTALS	**$64,300,000**

* See regional breakdown in Appendix 3.
Maps of Service Delivery Areas are shown in Appendix 4.

V. Home Energy Audit

As mentioned previously, the federal WAP regulations govern the expenditure of ARRA WAP funds. These regulations require the use of a DOE-approved energy audit, or priority list, to determine measures to be completed on each job. The audit must prioritize recommended measures by savings to investment ratio (SIR). Except for approved health and safety measures, only measures with an overall SIR of 1 or more can be completed.

DSS proposes to use the CL&P WRAP Home Check Energy Audit for the ARRA WAP program, since it is the only energy audit currently approved by the DOE for use in Connecticut. This audit is also supported by all of Connecticut's major electric and natural gas public utility companies, as mandated by section 16a-46 of the Connecticut General Statutes. This statute, requires the companies to provide low-income home energy audits in Connecticut.

DSS may seek DOE approval to amend the current audit or select a new audit to cover multi-family units or to fulfill the requirements of the ARRA program. DSS reserves the right to submit other energy audits to DOE for approval as may become necessary.

VI. Energy Conservation Measures

Possible measures to be installed on ARRA WAP jobs are detailed in the federal WAP regulations (10 CFR Part 440, Appendix A). These measures include, but are not limited to, the following:

- insulation;
- air-sealing;
- heating system tune-ups, repairs or replacements;
- window and door repairs or replacements; and
- energy- related health and safety measures or repairs necessary to protect the weatherization investment in the dwelling.

Historically, DSS has allowed installation of any measures permitted by federal regulations. The work done in each unit is determined by a DOE-approved energy audit. Typically, this work consists of air sealing, insulation, heating system repairs, window or heating system replacement, electric base load reduction, and work items that mitigate energy-related health and safety concerns. Other than health and safety measures, only those measures with an overall savings-to-investment ratio of 1.0 or greater can be installed by service providers. In other words, the cost of installing energy conservation measures in a building must not exceed the savings that can be expected during the normal life of the installed work.

DSS encourages use of renewable energy systems, alternative energy sources, and other "green" practices in its housing and energy programs. DECD, through this initiative, also proposes installation of renewable energy systems and green building materials. It is understood that the installation of renewables will only be permitted when consistent with DOE guidance and justified by an overall savings-to-investment ratio of 1.0 or higher, 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.

VII. Spending Limits Per Dwelling

The federal WAP regulations currently impose an average spending limit of $6,500 per dwelling unit, (previously $2,500 per unit), which is adjusted annually for inflation. DSS proposes to use the same average limit for the ARRA WAP. DSS also proposes a maximum spending limit, per dwelling unit, of $10,000. Within that maximum limit, DSS proposes a maximum health and safety spending limit of $2,500 per dwelling unit. Waivers will be considered for dwellings needing new heating systems. Each subgrantee will be responsible for ensuring that the $6,500 average per unit is maintained for the units they weatherize.

VIII. Eligible Dwellings

The federal WAP regulations will govern the determination of dwelling unit eligibility for the ARRA WAP. Generally speaking, with some exceptions, any single family or multifamily building, not previously weatherized, is eligible to be weatherized, as long as it is not for sale, in foreclosure, or in need of major rehabilitation.

Households must meet all income eligibility requirements for the unit to be weatherized. For two (2) through four (4) unit multifamily buildings, at least 50% of the tenants must be income eligible. For larger buildings, at least 66% of the tenants must be income eligible.

IX. Subgrantees and selection of new subgrantees

Existing subgrantees who are in good standing will receive funding each year unless the subgrantee withdraws or DSS monitoring of the subgrantee indicates serious problems. DSS, through its program and fiscal monitoring, examines the overall compliance of subgrantees with regard to expenditure of grant funds, production, work quality and compliance with federal and state laws, regulations, policies, and procedures. If serious concerns arise, DSS makes a determination concerning the subgrantee's ability to continue providing weatherization services. For example, DSS has determined that additional subgrantee capacity is needed to adequately serve the New Haven area. Selection of a subgrantee will be based on public comment submitted to DSS or offered at a public hearing, in accordance with 10 CFR § 440.15(d). In accordance with 10 CFR § 440.15 (a)(3), the DSS will give preference to existing subgrantees that are currently administering an "effective" program.

In order for an entity to qualify as a new subgrantee, it must :

- be a Community Action Agency (CAA) or other public or nonprofit entity
- be experienced and performed weatherization or housing renovation
- be experienced in assisting low-income persons in the area to be served
- be able to undertake a timely and effective weatherization program
- be in legal and financial compliance with requirements and regulations established under state and federal law
- provide a copy of the most recent annual report and the previous year's financial audit with all management notes and findings
- provide a list of the current board of directors or governing body and a copy of the by-laws 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 by otherwise demonstrating that the organization has the potential to provide such services in an efficient and responsible manner
- establish that it has special expertise for providing energy conservation programs, by demonstrating its management and outreach capabilities, technical skills and other qualities that render the entity qualified
- establish that it has experience in housing and construction management 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, subcontractor or a combination of the two will be used. New subgrantees will be expected to meet or exceed the work plan goals they propose.

Temporary Subgrantees

DSS also proposes to retain flexibility to add or change subgrantees, if necessary, to meet ARRA goals. Selection of additional subgrantees will be in compliance with the requirements outlined in 10 CFR § 440.15.. Specifically, DSS may add temporary subgrantees to provide overflow capacity and to assist targeted building portfolios, or to provide additional capacity in a specific geographic region. Temporary subgrantees will be solicited through a selection process, and will be chosen to work on targeted building portfolios or geographic areas. Candidates will be selected based upon their qualifications; ability to manage all responsibilities of a subgrantee; and ability to leverage other resources. These subgrantees will participate in the WAP only through the expenditure of the ARRA funds. Temporary subgrantees will be provided with all necessary training, as detailed in the Training Activities section of this plan.

X. Department of Economic and Community Development (DECD) Initiative

Background

Connecticut is one of four states with public rental housing developed with only state resources. Massachusetts and Connecticut (over 50,000 and 17,000 units respectively) account for more than 96% of all state-financed public rental housing in the nation. Since 1949, Connecticut's state-financed rental housing stock includes more than 8,100 units of housing for the elderly and disabled and more than 7,800 units of family public rental housing. The State of Connecticut, through the Departments of Mental Health and Addition Services, Social Services, Economic and Community Development and the Connecticut Housing Finance Authority has developed more than 565 units of supportive housing.

More than 30% of the state-financed rental housing stock is more than 50 years old. State-financed elderly/disabled housing was first constructed in the early 1960's. This means that most housing in the state was built at a time when energy costs were low and the technology to produce energy-efficient housing unavailable.

Proposal

DSS intends to work with DECD as a subgrantee on the weatherization of the state-financed portfolio of public housing. These properties generally house very low income elders, persons with disabilities and families and have very high energy bills. DSS has allocated **$19.5 million** to DECD for energy efficiency improvements and **$500,000** for training and technical assistance. It is the intent of our agreement with DECD to weatherize elderly housing units where heat is not included in the rent as a first priority. Housing units with tenants who are disabled or have children under that age of six will be weatherized if funds are available after those of the elderly. The goal for DECD is to weatherize **2,850** units of public housing over the term of the ARRA funding.

DECD will follow the WAP regulations and DSS policies in completing all the work on these units. Household eligibility will be established through the use of the DSS forms and procedures and DECD will keep all documentation on file for on-site review by DSS staff. DECD will enlist the use of contractors to meet the demands of the program. The selection of contractors will be made through a Request for Proposals process. All service providers will be required to follow sound internal management policies and provide skilled workmanship, high quality materials and timely weatherization of units. DSS will evaluate DECD's performance on a continuing basis throughout the contract period.

Labor Force Enhancement

DECD will subcontract for the following services: identification of eligible clients, evaluation/audit of dwelling units to be weatherized; installation of energy saving measures; identification and mitigation of related health and safety concerns; and supervision of weatherization work performed by staff or subcontractors.

Training of subcontractors and their staff will need to be augmented due to the volume and type of work to be performed under this ARRA funding. Subcontractors will need to hire additional workers to perform the weatherization services and those workers will need to be trained. Training of these workers will occur through mechanisms such as apprentice- type positions; specific classes offered by the Community Technical Colleges; classes held at the Vocational Technical High Schools; the Workforce Investment Boards (WIBs); and other arrangements that may be made by DSS.

The agreement with DECD will set out the terms of the labor force development and recruitment for these contractors, with specific language to encourage hiring people who are low-income or receive state financial assistance; unemployed; veterans, disabled; and people who are older and may have more trouble finding employment. .

Landlord Contribution Recommendations

Housing Authority and non-profit landlords are required to contribute 20% of the material cost for all buildings up to a maximum of $500.00 per eligible unit whichever amount is lower.

XI. Special Projects / Initiatives

DSS is proposing to allocate $7.1 million of the ARRA funds for Special Project/Initiatives.

Shelters

DOE has determined that weatherization program funds can be used for the weatherization of shelters. In their regulations DOE defines a shelter as a dwelling unit or units whose principal purpose is to house, on a temporary basis, individuals who may or not be related to one another. DOE has further identified that the state may count each 800 square feet or each floor of the shelter as a dwelling unit. It is anticipated that an equivalent of 1,300 units will be weatherized with ARRA funds. Approximately $3 million will be allocated for the weatherization of shelters. Although $3 million would allow for the weatherization of approximately 462 units at the average cost of $6,500 permitted by DOE, it is anticipated that many more units will actually be weatherized due to the number of dwelling units existing in a shelter.

DSS will contract with the CAAs in good standing and will develop criteria to identify the shelters to be weatherized with ARRA funds. Weatherization of these buildings will make them more energy efficient and improve the health and safety of the occupants. It will also result in lower energy bills enabling the shelters to use their limited funds for other services.

Any weatherization work performed on the shelters will be in accordance with the WAP regulations and ARRA guidelines.

Incentive Pool

Subgrantees will be given production goals in their contracts with DSS. Those subgrantees that meet or exceed the production goals will have access to an incentive pool of $3 million. This performance-based incentive will be made available to existing subgrantees that demonstrate the ability to effectively utilize ARRA funding during the initial program year. Pool funds will be allocated according to a formula which ensures equitable distribution on a statewide basis to those subgrantees that meet the production goals. DSS, in its decision to allocate additional funds, will give consideration to subgrantee capacity so that no subgrantee is provided with funding in excess of the amount that DSS reasonably expects the subgrantee to be able to utilize.

DSS will reserve the balance of the $7.1million to be allocated on an as-needed basis. Any unused training and technical assistance funds will also be added to this pool as the program progresses.

These additional funds may be provided to other entities, such as the Fuel Oil Conservation Board (FOCB) and the Connecticut Energy Efficiency Fund (CEEF) so that additional units may receive services for which funds were not previously available. These services may include the repair and replacement of heating systems and energy efficient lighting fixtures.

XII. Employment Created and Retained

The plan includes new efforts to ensure that weatherization assistance will increase the State's activities related to the development of a "green workforce." These efforts include those aimed at providing skilled workers who subgrantees may hire with the increased funding available through the ARRA.

Some CAAs will be partnering with utility companies, cities and the local community colleges and technical high schools to train persons in "green" technology. One such project will be between ABCD and the City of Bridgeport. In that project, people trained by ABCD to work in the weatherization program will have the necessary skills to enter a private sector, energy-related business and work in jobs relating to lowering dependence on fossil fuels and reducing greenhouse gas emissions and air pollution in the greater Bridgeport area.

As required under the ARRA, the plan describes the State's strategy for the use of ARRA funds. In most respects the plan is consistent with the Weatherization Program Year 2009 plan that was previously submitted for the WAP funding allocations. The plan describes DSS's strategy for adding temporary subgrantees and increasing the weatherization workforce, through coordinated workforce development and training programs, and to utilize ARRA funds in an effective manner within the time allowed.

Coordination among state agencies that administer energy, housing and human service programs has increased significantly and been an integral part of the planning for the expanded three-year program. Some of the agencies and organizations involved include the Connecticut Departments of Social Services (including the Bureau of Rehabilitation Services), Economic and Community Development, and Labor; the Connecticut Housing and Finance Authority; the Office of Workforce Competitiveness; the Workforce Investment Boards; the Institute for Sustainable Energy; WorkPlace, Inc.; the Connecticut Community and Technical Colleges; the CAAs; Jobs Funnel Programs; and the Governor's Office. Detailed plans for program implementation will continue to be worked out in the next several weeks. There are model programs in Connecticut with similar job skill requirements that successfully recruit, train and place individuals in apprenticeship positions and prevailing wage jobs in their region. Additionally, mechanisms for sustainable jobs and career- ladder opportunities, based on experience and training, are included in the program planning. DSS intends to distribute the ARRA funds in ways that will increase job opportunities and provide specialized training for and access to jobs during this economic downturn. The goal is that these jobs will continue or that the skills obtained through these jobs will be transferable and marketable in the "green" job market of the future.

As previously mentioned, recruitment will target a diverse population – some skilled and some new to the workforce – focusing on low- income individuals, displaced and unemployed workers, persons with disabilities, veterans and older workers. Below is a list of positions that DSS anticipates will be created or retained as a direct result of the additional funding under the ARRA for the WAP:

EMPLOYMENT ESTIMATES – CREATED & RETAINED	3 YR GOAL
Crew Workers/Installers (agency & contractor)	270
Crew Chiefs - Job Site Supervisors	50
HVAC Contractors	25
Energy Auditors	45
Inspectors .	30
Intake/Eligibility	60
Client Education Specialists	10
Local Agency Coordinators	25
Technical Monitors - On-site Monitoring/Oversight	15
Program Administration & Desk Monitoring/Oversight	15
Fiscal Administration & Financial Oversight & Audit	24
Trainers/Teachers/Technical Assistance	30
Equipment, Material & Supply Providers & Transportation	25
Operation and maintenance of vehicles and equipment	6
Inventory Control	10
	640

The above numbers, totaling 640, are initial estimates based on the percentage share of funding for Connecticut multiplied by the total anticipated national employment goals for the ARRA WAP as identified in a DOE presentation on Jan 2, 2009. It includes estimates from DSS. DSS has been working with the Workforce Investment Boards and the Office of Workforce Competitiveness to develop more accurate estimates of the jobs to be created and retained. This information should be available within a short period of time.

XIII. Training & Technical Assistance

To meet the extensive needs of the ARRA WAP, expanded partnerships for training and technical assistance (T&TA) are in the development stages between DSS, CAAs, DECD, Community and Technical Colleges, the Department of Labor, Workforce Investment Boards, the Institute for Sustainable Energy, the Conservation Services Group (CSG) and others, to ensure training and education for the specialized skills and knowledge required for the effective delivery of high-quality weatherization services in Connecticut. We intend to increase training through local and regional implementation across the state by using existing program providers, Workforce Investment Boards, the Community and Technical College network, and where appropriate, the Technical High Schools. The training curriculum and use of approved energy audit materials will be further developed to accommodate the magnitude of need and time requirements of this program.

State and local staff and contractors will be expected to be knowledgeable about the program and will undergo the certification and training required for their positions.

Training and Technical Assistance will be used for the following activities:

- Statewide Lead Safe Training on new DOE minimum standards
- Energy Auditor Certification Training Class (CSG)

- On-site training for crews, energy auditors and subcontractors.
- Mold and moisture detection training
- Annual combustion safety refresher training
- Client education training
- OSHA training for new staff and subcontractors

The core competency training is designed as a two-week training and includes courses in basic competencies, safe work practices, building evaluation, measure installation, final inspection, consumer education, monitoring, program management and training. In addition Crew Worker, Crew Chief, Inspector, Monitor and Auditor certifications and requirements are designed as on-the-job training as well as one- to two-day courses. A component of the training program may be to develop links between persons trained in the above-described coursework to subgrantees and their contractors, as a potential source of hire, similar to Jobs Funnel. It is anticipated that all person working in jobs retained or created by the ARRA WAP will receive some level of training and technical assistance.

In response to the expected demand for more trained auditors to handle the increased number of units that will be weatherized, DSS has already scheduled two auditor certification classes for June and September 2009 on the Home Check Energy Audit (the only audit currently approved by DOE for use in Connecticut.) DSS will also work with other expected program partners to ensure that their staff will be trained to perform these services.

Subgrantees are encouraged to assess training needs and explore T & TA opportunities that would specifically benefit their own staff and/or contractors. Training may also be provided on sustainable energy and "green" technologies and techniques. Requests for these activities require prior approval by DSS.

Ongoing communication and networking among these partners are essential components of the recruitment, training and employment for weatherization work. Monthly Weatherization Directors' meetings are planned. These meetings will be held in partnership with the Weatherization Residential Assistance Partnership (WRAP) and UI Helps, which administer utility-funded programs operated by the subgrantees. Monitoring visits to subgrantees provide additional opportunities for on-site training and technical assistance to ensure health and safety of clients and workers; maximize energy savings; improve program management; and ensure uniform implementation of program policies and procedures. Ongoing on-site training activities will continue at the state and subgrantee program levels.

XIV. Leveraging

The WAP in Connecticut has significant leveraging benefits. In partnership with the WAP, existing subgrantees also operate the utility-funded WRAP and the UI Helps Program. Funding for energy audits also comes from the major utility companies - Connecticut Light and Power, United Illuminating, Yankee Gas Services, Connecticut Natural Gas, and Southern Connecticut Gas Company. WRAP and UI Helps funds may be used for a variety of different activities, ranging from installing additional measures on WAP jobs to serving other low-income clients that do not receive services under the WAP. Additional leveraging of non-federal resources may include labor costs for the replacement of heating systems for WAP-eligible homeowners whose present heating systems need to be replaced.

The ARRA WAP funding provides additional opportunities that will be explored for leveraging resources from other state and local partner programs for weatherization services, employment and training activities, energy conservation and savings. Additional financial and resource leveraging is inherent in the economic stimulus from monies made available to households through energy conservation savings, as well as earnings from jobs created and retained and then spent in the marketplace.

XV. Grantee Program Oversight

DOE has informed states that they and their subgrantees must ensure the transparency and accountability of the funds available in the ARRA. DSS's current oversight activities, therefore, will need to be increased for purposes of the ARRA.

Subgrantees are required to inspect the weatherization work performed on a dwelling before it may be submitted to DSS for approval and reimbursement. States are required to perform file reviews on 10% of units weatherized and conduct inspections on 5% of completed units or units being weatherized. DOE strongly encourages a higher percentage of the units to be inspected under ARRA funding and DSS intends to perform file reviews on at least 20% of the total number of units weatherized. DSS will complete on-site inspections of at least 12% of the total units weatherized. In addition, comprehensive monitoring will be conducted at a minimum of annually at each subgrantee and its partner agencies. DSS will also provide the same oversight to any partner agency that it contracts with to perform weatherization work.

Field Monitoring

To meet the current needs of program oversight, DSS utilizes two experienced Program Specialists to monitor subgrantee activity. They are assigned to specific agencies on a rotating basis and report directly to the WAP Program Manager. They are responsible for monitoring all aspects of the WAP, including, but not limited to, the following: financial and program management; operating procedures; file reviews; inspection of work in process and completed jobs; procurement procedures; inventory control; operation and maintenance of vehicles and equipment; and adequacy of coverage of service areas.

DSS is committed to ensuring that the integrity of the program is maintained and plans on acquiring four additional durational staff to provide oversight and technical assistance to the subgrantees during the ARRA contract period. The staff will be expected to be knowledgeable about the program and will undergo the same certification and training that is required for all subgrantee field staff. Out of these four, two staff persons will be assigned to provide monitoring and technical assistance to DECD.

Monitoring visits will be made to each subgrantee or its contractor agency on at least a monthly basis. Regular monitoring visits usually consist of client file reviews and inspections of completed units, to ensure quality of work and client satisfaction. The annual comprehensive monitoring visits are more detailed, and include the broad categories mentioned above. Additional visits will be made to provide training and technical assistance in response to observations from monitoring visits or to provide assistance on new requirements or changes in program operation.

If DSS cannot hire durational staff, it may need to use qualified contractors to conduct monitoring activities and ensure compliance with the ARRA. The graph below indicates the number of file reviews and on-site inspections that are proposed based on the total number of units to be weatherized.

Entities	Minimum Goals	File Reviews (20%)	On-site Inspections (12%)
CAAs	3,497	699	420
DECD	2,850	570	342
Shelters	1,300	260	156
Total	7,647	1,529	918

Fiscal Monitoring

A fiscal staff person is currently assigned to the Community Energy and Refugee Services Division to process the monthly financial reports provided by each subgrantee and complete reports for submittal to DOE, DSS and the subgrantees. The fiscal staff person also performs the fiscal monitoring portion of the annual comprehensive monitoring of each subgrantee to ensure adequate financial management control. The procurement procedures are also reviewed to ensure that materials meet federal specifications and are cost effective.

A Building Weatherization Report (BWR) is completed for each unit that is weatherized and inspected and is submitted to DSS with the subgrantee's monthly fiscal report. The fiscal staff person reviews each BWR to check for compliance with the standards of the energy audit, demographic information and the expenditures reported and match back to the fiscal report. To meet the requirements of ARRA, DSS expects to acquire two additional durational fiscal staff persons, one of whom would be assigned to the DECD contract.

Project Manager

A durational project manager will be hired to oversee the operation of the ARRA WAP. Responsibilities will include the planning and statewide coordination of the ARRA WAP and supervision of the state weatherization staff. This position will identify needs for program capacity and training, and will ensure that there is statewide program consistency and adherence to program specifications, rules and regulations.

The person in this position will have daily contact with subgrantees throughout the state and will communicate regularly with national and state funding sources. This position requires the ability to effectively communicate with staff, managers, other state and federal agency staff, local service providers and the public.

This position assures that the complex and varied state and federal procedures and regulations are followed by the state, subgrantees and other partners implementing the program. The durational project manager will provide necessary technical assistance for effective program delivery through the community partner network.

Quality Assurance

DSS will acquire a durational Accounts Examiner who will be assigned to the Quality Assurance Division. This person will ensure that the ARRA requirements concerning transparency and accountability are met. The Accounts Examiner will be responsible for auditing financial transactions in the funding and payment cycles, and ensuring that the federal and state Single Audit Requirements are met.

The specific audit responsibilities of this position are itemized in Appendix 1 of this document.

ARRA Requirements of Separate Accounts

The ARRA requires that DSS set up separate accounts for all ARRA funding and track all aspects of this program separately from the standard WAP. DSS is committed to doing this and has already initiated these accounts in the CORE system.

Each subgrantee and subcontractor will be required to keep the ARRA funds in separate accounts; any co-mingling of funds will be strictly prohibited. DSS's Quality Assurance Division recommends that any subgrantee or contractor chosen to receive the funds be required to segregate the funds in checking accounts that are completely separate from the regular operational accounts. The ARRA WAP funds should not be co-mingled with any other agency funds. If subgrantees or contractors are unable to adhere to these requirements, they will not be eligible for participation in this program. This requirement will be made a part of their contracts.

APPENDIX 1
QUALITY ASSURANCE AUDIT OF THE WEATHERIZATION PROGRAM

Purpose of the Quality Assurance Audit

Determine whether the CAAs and other subgrantees and sub-contractors

- are in compliance with the ARRA WAP grant requirements
- have financial controls in place to ensure the proper use and allocation of program expenditures
- are expending ARRA WAP funds are in accordance to the grant intent and goals.

Audit Steps

- Determine the requirements of the ARRA WAP by reviewing federal statutes and regulations, state statutes, OMB Circular A-133, and DSS Program Policy and Procedures.
- Interview DSS program management, to determine DSS's responsibilities for monitoring the WAP
- Interview subgrantee's personnel to
    - establish that control procedures are in place to ensure compliance with federal laws and grant requirements.
    - determine the subgrantee's procedures for determining eligibility and administering the program.
    - determine if the subgrantee has an accounting manual and established accounting procedures.
    - determine the subgrantee's recordkeeping system for accounting for grant/contract funds.
    - determine whether ARRA WAP funds are kept in a separate bank account.
    - determine whether there is a proper segregation of duties for signing checks and withdrawing program funds.
    - determine whether bank reconciliations are current.
- Obtain and review any independent audit reports and DSS program monitoring reports concerning the subgrantee to identify any prior findings related to the WAP or overall internal control weaknesses. If there were any such findings,,, determine whether and what corrective action was taken to address the findings.
- Obtain any monthly program financial reports submitted to DSS.
- Obtain a copy of the subgrantee ARRA WAP budget.
- Compare the actual subgrantee expenditures to the ARRA WAP budget to determine whether the subgrantee is in compliance with the approved budget.
- Determine whether administrative costs (payroll, insurance, rent etc.), are properly allocated and are within the budgeted amount.
- Sample payroll time records to determine whether staff is properly recording their ARRA WAP labor hours.

- Sample program expenditures to determine whether payments are supported by invoices, receipts, or other supporting documentation.
- Determine whether that the subgrantee's inventory system has sufficient controls to determine that all ARRA WAP materials purchased are accounted for.
- Sample and review client files to determine compliance with the eligibility requirements and required documentation.
- Perform several on- site visits to confirm that the work was actually performed.

APPENDIX 2
WEATHERIZATION ASSISTANCE PROGRAM SUBGRANTEES

There are currently four subgrantees that have been selected in accordance with 10 CFR § 440.15 to provide weatherization services with ARRA funds. An additional subgrantee will be chosen for the Greater New Haven service area to ensure that all areas of the state are served. All of these organizations are CAAs and have many years of experience operating the WAP. These subgrantees also have many years of experience operating a variety of programs for low-income households. Each year, public comment is encouraged concerning these subgrantees at the required public hearing. DSS reviews these subgrantees annually concerning their past performance and their ability to continue in Connecticut's WAP. The proposed subgrantees for the ARRA program are:

Action for Bridgeport Community Development, Inc. (ABCD), 1407 Fairfield Ave, Bridgeport, CT 06604

ABCD serves the towns of: Bridgeport, Darien, Easton, Fairfield, Greenwich, Monroe, New Canaan, Norwalk, Stamford, Stratford, Trumbull, Weston, Westport, and Wilton.

The Community Renewal Team, Inc. (CRT), 555 Windsor Street, Hartford, CT 06120

CRT serves the towns of: Avon, Bloomfield, Branford, Bristol, Burlington, Canton, Chester, Clinton, Cromwell, Deep River, Durham, East Granby, East Hartford, East Haddam, East Hampton, East Windsor, Enfield, Essex Farmington, Glastonbury, Granby, Guilford, Haddam, Hartford, Killingworth, Madison, Manchester, Marlborough, Middlefield, Middletown, New Britain, Newington, North Branford, Old Saybrook, Plainville, Plymouth, Portland, Rocky Hill, Simsbury, South Windsor, Suffield, West Hartford, Wethersfield, Westbrook, Windsor and Windsor Locks.

New Opportunities, Inc. (NO), 232 North Elm Street, Waterbury, CT 06702

NO serves the towns of: Barkhamstead, Berlin, Bethel, Bethlehem, Bridgewater, Brookfield, Canaan, Cheshire, Colebrook, Cornwall, Danbury, Goshen, Hartland, Harwinton, Kent, Litchfield, Meriden, Middlebury, Morris, Naugatuck, New Fairfield, New Hartford, New Milford, Newtown, Norfolk, North Canaan, Prospect, Redding, Ridgefield, Roxbury, Salisbury, Sharon, Sherman, Southbury, Southington, Thomaston, Torrington, Wallingford, Warren, Washington, Waterbury, Watertown, Winchester, Wolcott and Woodbury.

The ACCESS Agency, Inc. (ACCESS), 1315 Main Street, Willimantic, CT 06226

ACCESS serves the towns, of: Andover, Ashford, Bolton, Bozrah, Brooklyn, Canterbury, Chaplin, Colchester, Columbia, Coventry, Eastford, East Lyme, Ellington, Franklin, Griswold, Groton, Hampton, Hebron, Killingly, Lebanon, Ledyard, Lisbon, Lyme, Mansfield, Montville, New London, North Stonington, Norwich, Old Lyme, Plainfield, Pomfret, Preston, Putnam, Salem, Scotland, Somers, Sprague, Stafford, Sterling, Stonington, Tolland, Thompson, Union, Vernon, Voluntown, Waterford, Willington, Windham and Woodstock.

The Greater New Haven Area

Agency To Be Determined to serve the towns of: Ansonia, Beacon Falls, Bethany, Derby, East Haven, Hamden, Milford, New Haven, North Haven, Orange, Oxford, Seymour, Shelton, West Haven and Woodbridge.

Connecticut Department of Economic and Community Development, 505 Hudson St., Hartford, CT 06106

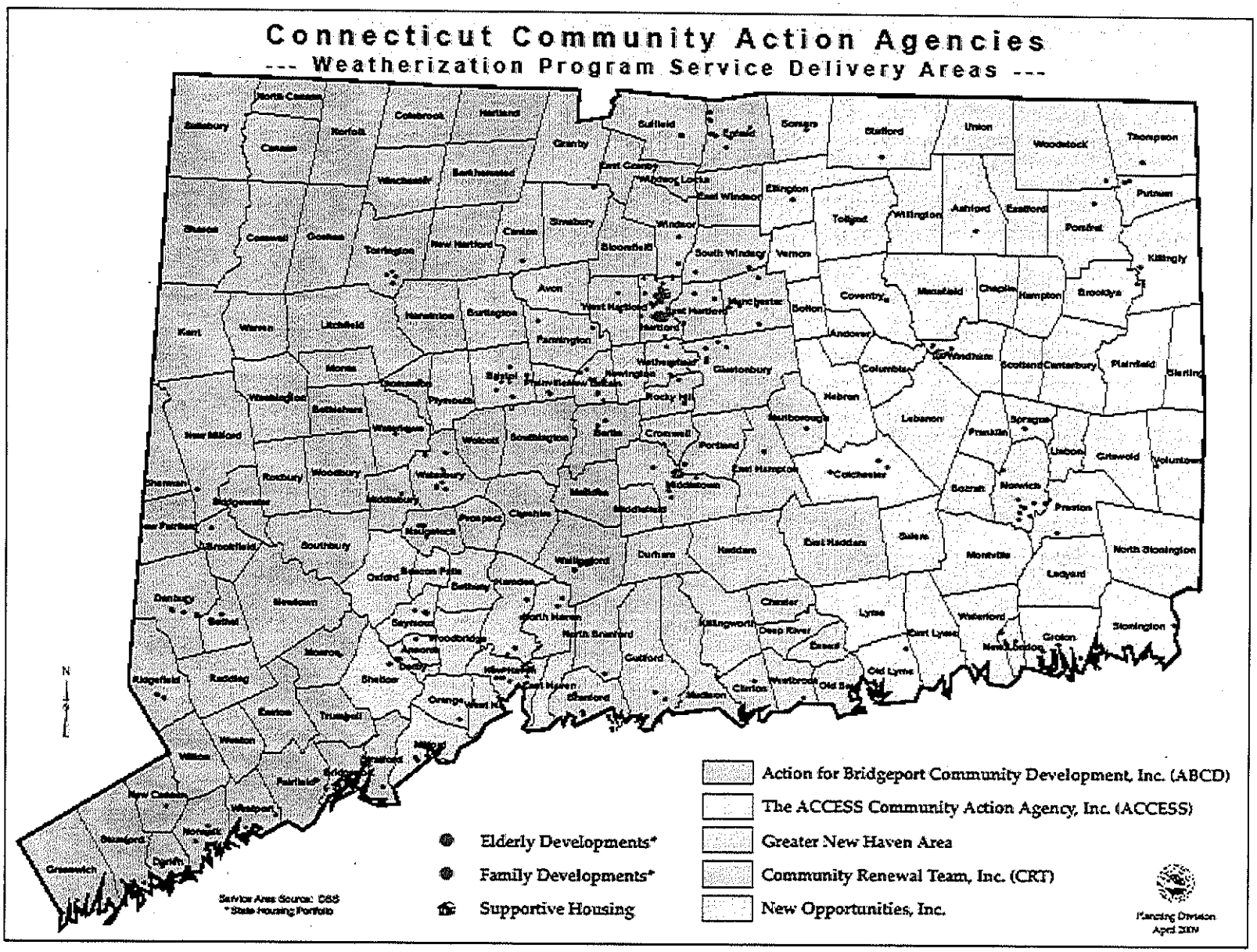
DECD will provide ARRA Weatherization services to state public rental housing units throughout the state.

APPENDIX 3 - ARRA WEATHERIZATION SUBGRANTEE DATA

Community Action Agency	Allocation	Total Units to be Weatherized	Units to be Weatherized by Service Area		Units to be Re-Weatherized	Rental Units to be Weatherized	Sources of Labor	Congressional District					% Of District Served				
								1	2	3	4	5	1	2	3	4	5
Action for Bridgeport Community Development, Inc.	$ 5,900,899	770	Bridgeport Area	525	20	270	crew/ contractor			X	X				5	90	
			Norwalk Area	99													
			Stamford Area	146													
Community Renewal Team, Inc.	$ 5,378,787	695	Hartford	541	20	243	crew/ contractor	X	X	X		X	75	15	10		10
			Bristol Area	71													
			New Britain	83													
New Haven Area	$ 4,217,099	528	New Haven Area	408	20	185	contractor			X	X				75	5	
			Derby Area	120													
New Opportunities, Inc.	$ 6,981,930*	717	Waterbury Area	449	20	251	crew/ contractor	X		X	X	X	25		10	5	90
			Danbury Area	128													
			Meriden Area	140													
The ACCESS Agency, Inc.	$ 6,021,285	787	Danielson Area	353	20	275	contractor		X					85			
			Norwich Area	434													
CAAs TOTAL	$28,500,000	3,497			100	1,148											
DECD	$20,000,000	2,850	Statewide		0	2,850	contractor	Statewide									
SPECIAL PROJECTS	$ 7,100,000	1,300	Statewide		0	1,300	contractor	Statewide									
TOTAL	$55,600,000	7,647			100	5,298	crew/ contractor										

* Includes $1,000,000 for statewide Training and Technical Assistance activities and $450,000 for statewide Leveraging activities.
The estimated number of eligible dwelling units statewide with elderly is 30,563 and disabled is 14,739.

APPENDIX 4 – SERVICE DELIVERY AREA MAPS

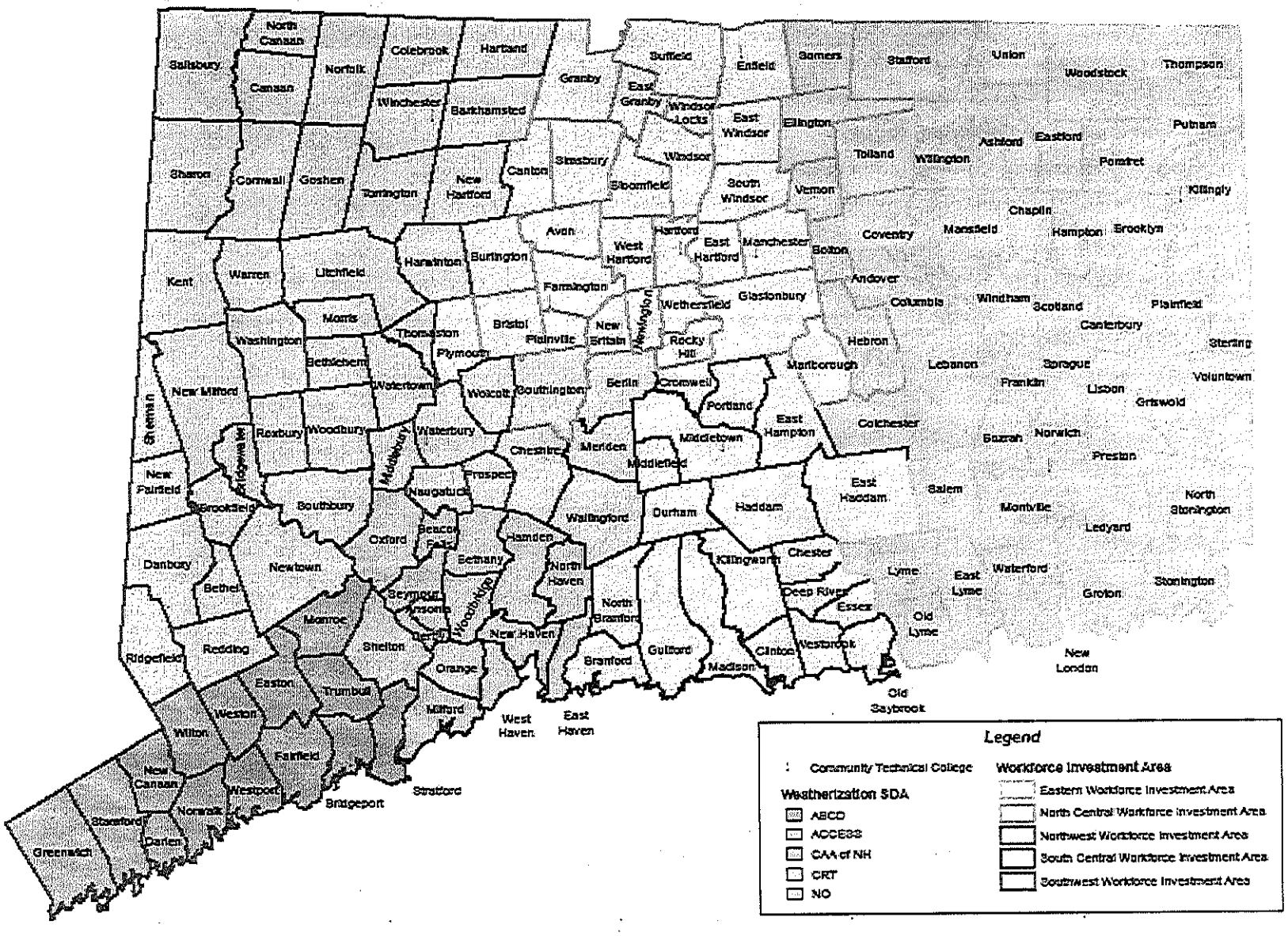


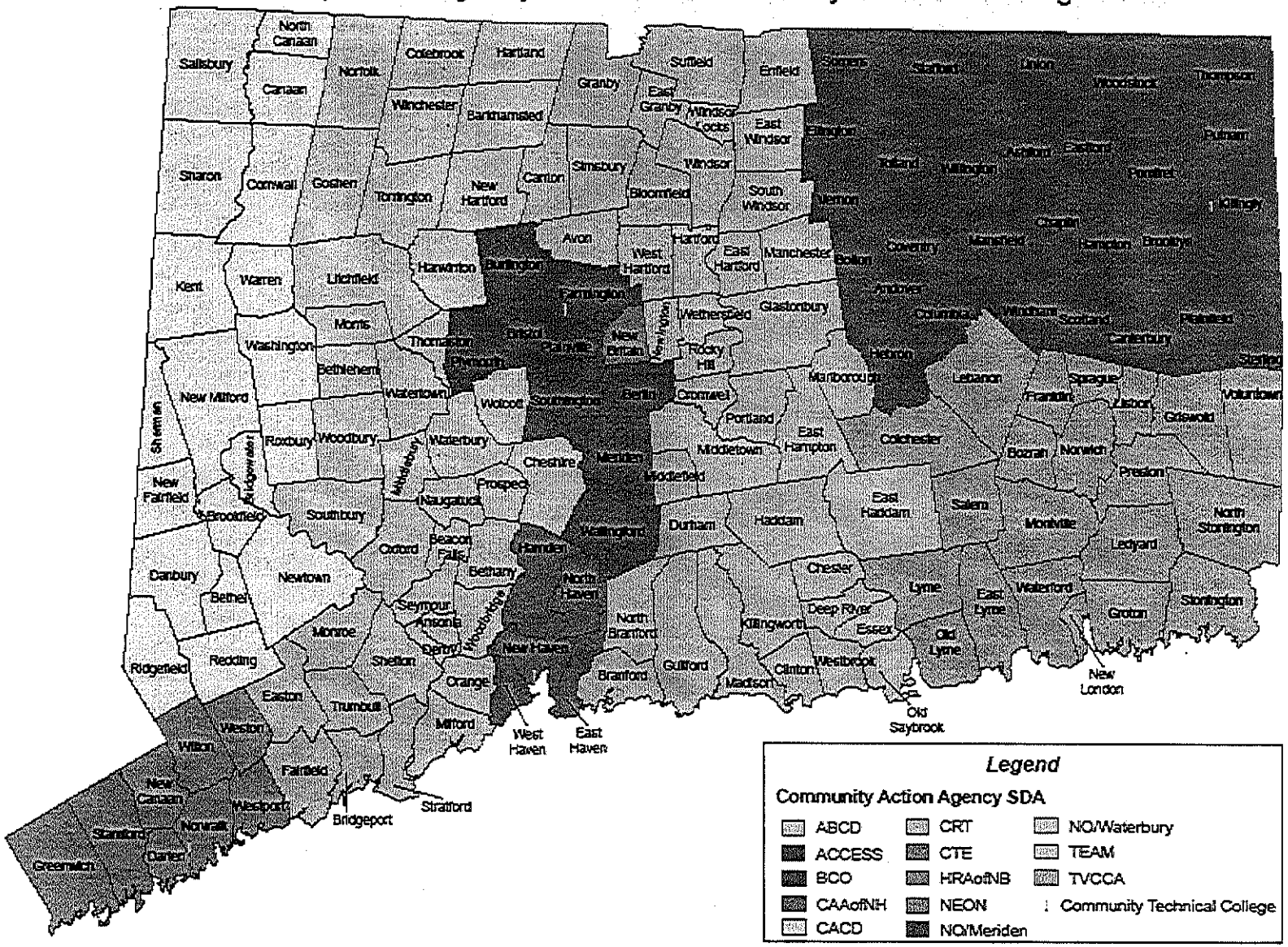
Geocode address match:
Elderly developments - 81% / Family developments - 90% / Supportive bag developments - 100%

L. Zajac

APPENDIX 4 – SERVICE DELIVERY AREA MAPS

Weatherization SDAs with Workforce Investment Areas and Community Technical Colleges



APPENDIX 4 – SERVICE DELIVERY AREA MAPS

Community Action Agency SDAs with Community Technical Colleges