



# SCEP

STATE & COMMUNITY ENERGY PROGRAMS

# Federal Coordination and Braiding Funds

## Accessing HUD Resources in DOE Weatherization Program

December 2022



# Introduction

## Session Outline:

- Client Eligibility and Coordination
- Braiding leveraged funds

# Interagency Collaboration

## Partners

DOE

HHS

HUD

VA

Newest Partner:

USDA

## Collaboration

### Interagency Working Group

- Compared the current eligibility guidelines for each program.
- Worked to determine if there is overlap that the federal agencies may consider for requesting categorical allowances to streamline program intake.

# Client Income Eligibility Matrix

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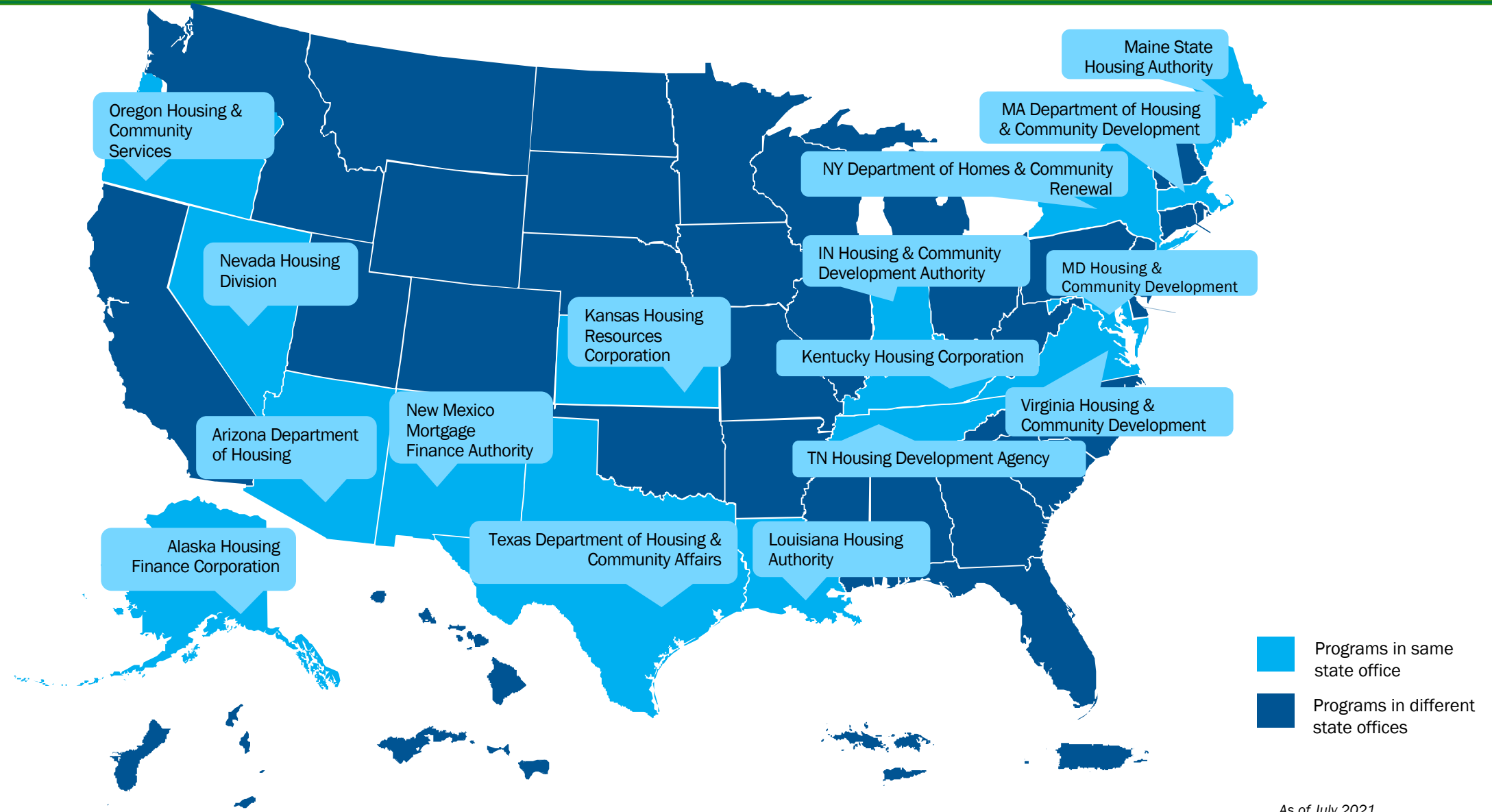
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## **Methodology:**

Group compared the current eligibility guidelines for each program including the national Poverty Income Guidelines against the 60% State Median and Area Median Income (various levels) to determine if there was sufficient overlap that the federal agencies wanted to consider in the future for requesting categorical allowances to streamline program intake.

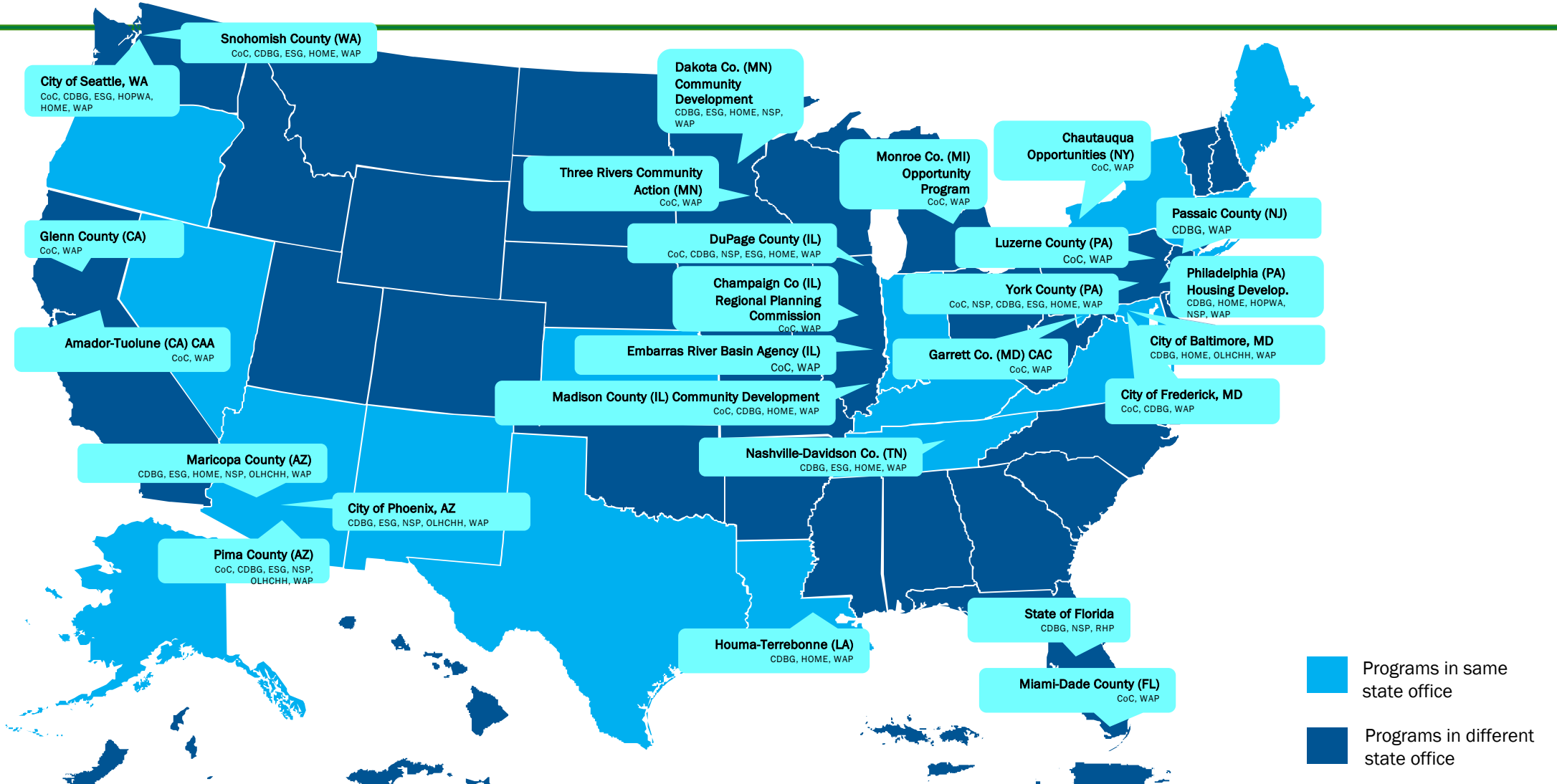
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# State Offices | WAP and HUD Management



As of July 2021

# Program Overlap | WAP and HUD Programs (Incl Continuum of Care)



**Program Key:**

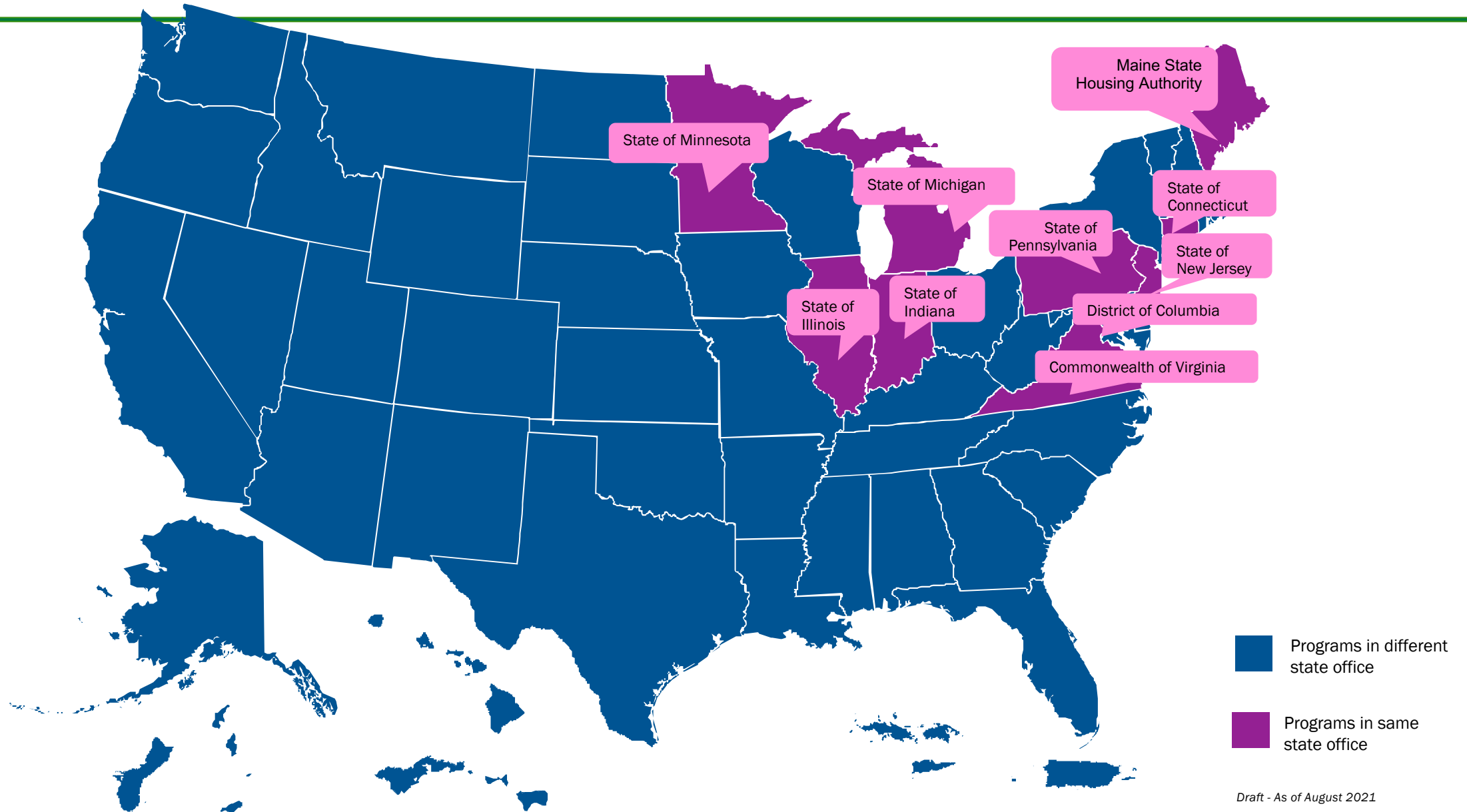
**CoC:** Continuum of Care Program  
**CDBG:** Community Development Block Grants  
**ESG:** Emergency Solutions Grants Program  
**HOPWA:** Housing Opportunities for Persons with AIDS Program

**HOME:** HOME Investment Partnerships Program  
**NSP:** Neighborhood Stabilization Program  
**OLHCHH:** Lead Hazard Control & Healthy Homes Lead Hazard Control  
**RHP:** Recovery Housing Program  
**WAP:** Weatherization Assistance Program

Light blue box: Programs in same state office  
 Dark blue box: Programs in different state office

As of August 2021

# State Office Overlap | WAP and Lead Hazard Control and Healthy Homes



# Current Income Eligibility Statute for WAP

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## **42 USC § 6861 - 6873**

**6862:** The term “low-income” means that income in relation to family size which:

(A) is at or below 200 percent of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget, [...]

(B) is the basis on which cash assistance payments have been paid during the preceding 12-month period under titles IV and XVI of the Social Security Act or applicable State or local law, or

(C) if a State elects, is the basis for eligibility for assistance under the Low-Income Home Energy Assistance Act of 1981 provided that such basis is at least 200 percent of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget.

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**6865:** Funds will be allocated on the basis of the relative need for weatherization assistance among the low-income persons within such State or area, taking into account appropriate climatic and energy conservation factors.

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# WPN 22-5: Expansion of Client Eligibility

**Purpose:** Streamline program intake by accepting HUD Means-Tested Programs' income qualifications.

**Effective:** Dec. 8, 2021

## Example:

If a family is income eligible for CDBG Rehabilitation assistance, **the family will automatically meet the income-eligibility qualifications for DOE's WAP without requiring additional verification/paperwork**, thereby creating better coordination among the programs, and allowing providers to easily **braid resources** to meet a family's needs.

# Expansion of Client Eligibility

- DOE WAP accepted sources of income verification:

HHS LIHEAP eligibility  
as categorically  
income-eligible

HUD's verification of  
household incomes in  
multifamily public or  
multifamily assisted  
housing.

*NEW:*  
HUD means-tested  
programs as  
categorically income-  
eligible

# Expansion of Client Eligibility: Multifamily

## Multifamily-Specific Guidance

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### **Housing Type:**

### **Guidance:**

**Housing owned and operated by HUD Public Housing Agencies:**

WAP providers shall consider all such buildings managed by the PHAs referenced in the [HUD Web page](#) to be 100 percent income eligible.

**Privately owned multifamily buildings receiving project-based assistance:**

WAP providers should refer to the [updated lists](#) to determine the percentage of the units in each building that are income eligible.

**Privately-owned multifamily buildings that house residents receiving tenant-based assistance:**

WAP providers will determine the percentage of income eligible residences by either contacting the building owner/manager to obtain such Section 8 Housing Choice Voucher records (from HUD's Tenant Based Rental Assistance Program or by individually verifying which residents hold such vouchers.

# Examples of HUD Means-Tested Programs

HUD Lead  
Hazard Control  
Grants

HUD Multifamily  
Assisted  
Properties

HUD Public  
Housing

HUD Vouchers

HUD-VASH  
Vouchers (VA  
Supportive  
Housing);

HUD HOME  
Investment  
Partnerships  
Program

# FEDERAL PROGRAM COORDINATION - HUD

# Interagency Collaboration

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## **FY 2022 Appropriations:**

- **DOE has been directed to continue to collaborate with partners at Department of Health and Human Services, the Department of Housing and Urban Development, and the Department of Veterans Affairs.**
  - More recently, collaboration has included Department of Agriculture and FEMA
- **Interagency collaboration among federal agencies could be particularly helpful for identifying and weatherizing residences under the various agencies' programs.**

# Overlap in DOE, HHS, and HUD Programs

## Discussion with local weatherization providers

- Interagency working group held initial discussions with 9 local weatherization providers, whose agency receive DOE and HUD funds.
  - **Purpose:** Discuss the intricacies of braiding, challenges and best practices, in order to create models and tools that harmonize and streamline program requirements, such as income eligibility, for other weatherization providers to replicate.
  - The group has also discussed with local providers whose agency is receiving these multiple federal funding sources **but are not currently braiding resources**, the barriers to braiding in order to identify potential gaps or necessary supports to further the federal investment through such braiding.

# BRAIDING LEVERAGED FUNDS



# Program Rules and Guidance

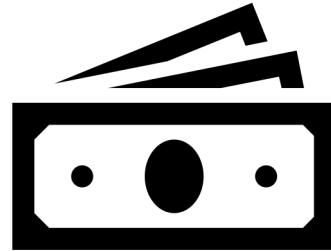
- **10 CFR 440.1** – Purpose and Scope
  - “to increase the energy efficiency of dwellings owned or occupied by low-income persons or to provide such persons renewable energy systems or technologies, reduce their total residential expenditures, and improve their health and safety”
- **10 CFR 440.21(d)** – Energy Audit Procedures
  - Except for materials to eliminate health and safety hazards, each individual weatherization material and package of weatherization materials installed in an eligible dwelling unit must be cost-effective.
- **Braiding: Flexibility provided while remaining compliant with DOE rules**
  - Leveraged funds can pay for measures with SIR <1.0
  - Memo 035 – Leveraged funds in multi-family projects

# Leveraged Funding in WAP



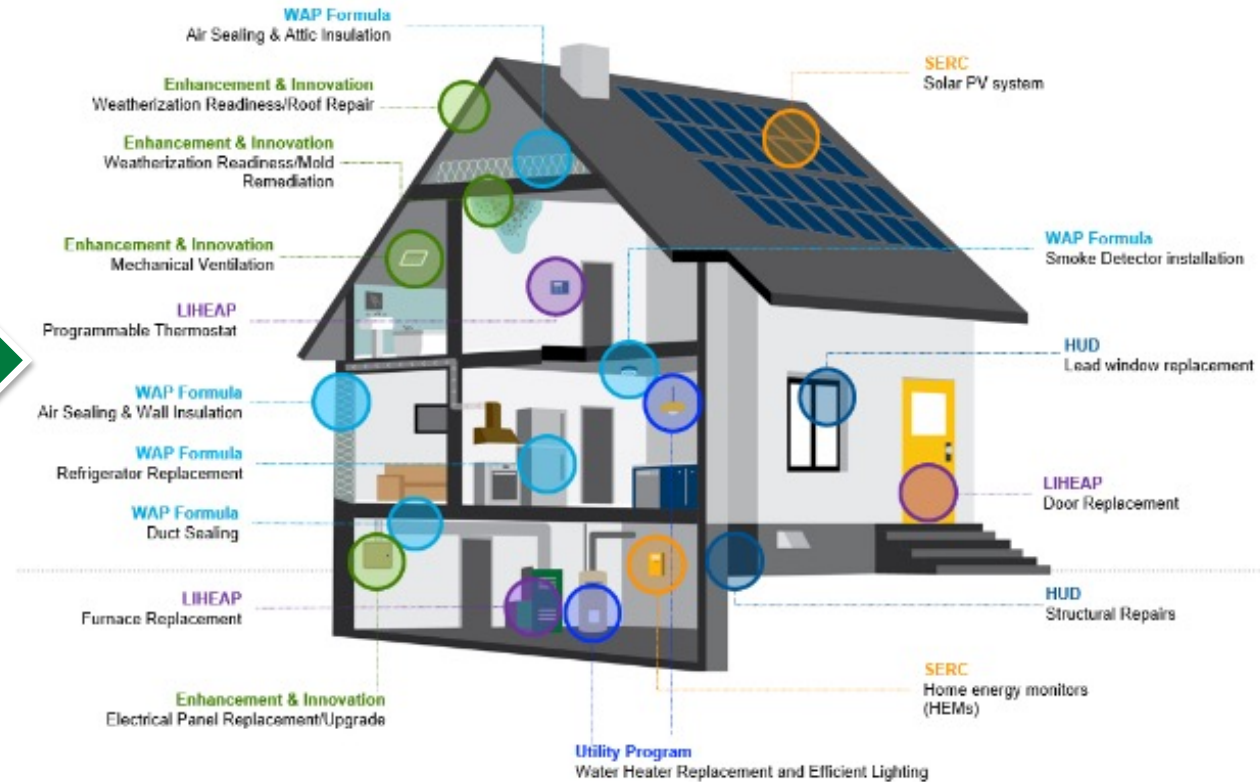
## LEVERAGING ACTIVITIES:

Activities that support securing and administering non-DOE funding for weatherization



## LEVERAGED FUNDING:

Federal and non-federal funding secured to supplement DOE WAP



## BRAIDING FUNDS:

Utilizing two or more funding sources on a job. Each funding source can be isolated from all others in financial/accounting and reporting systems.

# Practical Next Steps

- **Lead Hazard Control and Healthy Homes – Cooperation Demonstration**
  - 5 communities, must be funded by WAP to qualify.
- **Community Development Block Grants** – carry out a wide range of community development activities and possibilities for intersections
  - Find HUD’s Grantee for your area [here!](#)
- **Multifamily Housing and Assisted Properties –**
  - WPN 22-5 outlines coordination points and DOE is in process of building practical steps outline for providers to follow in coordinating with PHAs to get buildings in the Program.

# THANK YOU!

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