Use of Weatherization Program Funds to Benefit Residents of Multifamily Housing

By: Stephen Glatter and Jeanne Engel

The federal government's Weatherization Assistance Program (WAP) seeks to reduce the energy burdens of low-income individuals by paying for the procurement and installation of energy efficient measures. WAP was boosted in 2009 by $5 billion in stimulus funding, a substantial increase over previous years' funding levels of $205 million. This increase has taxed the ability of subgrantees to ramp up and use the funds at a pace necessary to spend their stimulus funds by the March 2012 deadline. Although use of WAP funds in multifamily housing might accelerate the pace of expenditures, the portion of WAP funds either allocated or employed for multifamily housing remains small.

According to the Census Bureau's 2007 American Housing Survey, nearly 52% of program-eligible households are renters.[1] Yet, with few exceptions, low-income renters are largely unable to reap the benefits of stimulus funds intended for their demographic. Most states and local grantees are reluctant to take on the complexities of multifamily building projects and many see multifamily as siphoning off funds that could or should be used to assist single family homeowners. Also, weatherizing multifamily properties often requires different skill sets that may not be available to subgrantees. Targeting funds to low income homeowners may have made sense before the vast increase that came with the stimulus bill but this approach no longer aligns with the amount of funds available, the low incomes of affordable multifamily housing residents, or the need for states to significantly speed up their use of stimulus weatherization funds.

In fact, many states are in danger of failing to spend their stimulus WAP funds before the March 2012 deadline. A February DOE Inspector General's report criticized the slow spending of WAP funds, and the DOE released a document in May suggesting an increased pace in WAP spending among states. While the overall pace of spending indeed sped up during the first quarter of 2010, many states are still well behind the pace necessary to spend all program dollars by the March 2012 deadline. Also, a number of the largest recipients of stimulus WAP funds are

[1] 2007 American Housing Survey, U.S. Census Bureau, Table 2-12, available at http://www.census.gov/hhes/www/housing/ahs/ahs07/ahs07.html.

among the group that is appears to be at risk for not spending all allocated funds. These include Texas, California, Florida, North Carolina, New Jersey, and Colorado.[2]

There have been successful multifamily weatherization programs on the local subgrantee level. One such program, run by the Community Housing Partners Corporation (CHPC), with a service area covering eighteen counties in Virginia, has managed to weatherize 846 multifamily units annually since receiving stimulus funds—over four times its previous annual output. This increased pace has created twenty-three new jobs at CHPC alone, allowed CHPC to conduct more subcontractor training sessions, and enabled CHPC to weatherize eighty percent of its portfolio. Another program is run by the Community Environmental Center (CEC), the largest WAP subgrantee in New York State. Led by its President and CEO, Richard Cherry, CEC has become a leading voice in multifamily WAP policy because of its longstanding experience and history of successful projects.

Successful local subgrantee programs are important, but very few exist and their impact areas are geographically narrow. While existing subgrantees that possess the capacity to perform multifamily weatherization should be encouraged, it is unlikely that the wide collection of subgrantees with little to no experience could ramp up multifamily in the remaining time. For this reason, state-wide programs are appropriate and recommended.

Faced with the task of spending WAP dollars at significantly higher levels, some states saw an opportunity to address high utility costs affecting the lives of their low-income renter populations. Today, a number of states have established some priority (specific set asides, designation of state-wide subgrantees, policy flexibilities) in the use of weatherization funds for multifamily, but these efforts are uneven and many have yet to weatherize units. Several states have designated existing state agencies as subgrantees. These agencies have the necessary multifamily expertise and offer a consistent approach and process. In addition, the ability to work under the administration and regulations of one state office rather than through multiple disparate local subgrantees is valued by owners of multiple developments located throughout a state, particularly in those areas of a state not served by a local subgrantee.

Several states, including Kansas, New Jersey, Pennsylvania and Colorado (all described below) have designated agencies and offer excellent state-wide weatherization programs. Together, these states' experiences serve as both as a guide for other states to establish their own state-wide multifamily weatherization programs and as a summary of the obstacles that remain in the way of these programs and how they can be avoided.

[2] Charts detailing states' performance and pace of spending stimulus WAP funds through 1Q 2010 are attached as Appendix I.

I. HISTORY OF WEATHERIZATION

The federal government, through the Department of Energy, began issuing funds to weatherize existing homes in 1976. The funds are targeted to low-income households—especially the elderly, disabled, and families with children. Traditionally, WAP funds travel through the states to local subgrantees with rigidly defined program borders that administer final disbursement of the funds and provide oversight.

The American Reinvestment and Recovery Act of 2009 (ARRA) allocated $5 billion in stimulus funds for the WAP program—an enormous increase for a program that was never allocated more than $245 million. Such a significant increase created new opportunities to reach the low-income multifamily market, both because the influx of program money provides greater flexibility and also because it is a huge untapped market that states can target to help meet their higher program goals. But, after over thirty years of administering a primarily single-family WAP program, most local subgrantees lack the capacity to undertake weatherization of large, more complex multifamily projects. As a result, many local subgrantees have avoided the multifamily market despite the fact that 52% of the WAP program's intended beneficiaries—low-income individuals—are renters and the fact that many millions of elderly, disabled, and families with children live in multifamily, public, and assisted housing. Luckily, a number of states have recognized the importance of seizing the opportunity to finally enter the multifamily WAP business, and have set up state-wide programs and/or set aside portions of their ARRA WAP funds to reach the needy individuals living in affordable multifamily housing.

II. STATE MULTIFAMILY WAP PROGRAMS

For states that lack border-to-border subgrantees with the knowledge and capability to operate multifamily weatherization programs, state-wide programs are preferred. Though variation and experimentation among state programs is important and helpful, there are several common elements of multifamily weatherization programs that maximize the potential for success. The first is that at least one WAP subgrantee is an agency or nonprofit organization with a program area spanning the entire state. Second, these entities should have experience working with multifamily housing owners, developments and programs. For example, state housing finance agencies, state energy relief agencies with multifamily experience, and affordable housing nonprofits could enter the multifamily weatherization business much easier than existing subgrantees or other agencies that lack experience with multifamily projects or that have dealt solely with single-family housing issues. Third, entities should be properly staffed and equipped to handle a significant portion of a state's WAP budget. Finally, to be effective, entities should be given WAP responsibility quickly in order to take advantage of a state's unspent stimulus dollars. States should be creative in their approach to multifamily weatherization while implementing a program with this basic outline.

As of July 2010, states we have identified as making some sort of statement of support for multifamily weatherization include Alaska, California, Colorado, Delaware, Florida, Kansas, Massachusetts, Michigan, Missouri, New York, Ohio, Oregon, Pennsylvania, Rhode Island, Texas, Vermont, Washington, and Wisconsin. Though many states have identified multifamily weatherization as necessary, the degree to which states have committed time, energy, and money varies. Some states, like Texas and California, have simply encouraged local subgrantees to spend funds on multifamily projects or, like in Ohio, dedicated a staff member for handling multifamily applications, while others, such as Pennsylvania have established full-scale operations to administer multifamily projects.

Florida has set aside $35 million to weatherize multifamily buildings, but has yet to develop a plan or an agency to administer the spending. Massachusetts, through its Department of Housing and Community Development, set aside $6 million to, jointly with local subgrantees, weatherize an estimated 923 units that were in danger of being lost from the affordable housing sock. Similarly, Oregon dedicated 25% of its ARRA WAP funds for multifamily projects but did not create a state-wide program. Missouri set aside 20% of its ARRA funds for its *Energize Missouri Homes* initiative that sought out innovative proposals for the use of its WAP funds including, but not exclusively, proposals for multifamily projects. Michigan's Department of Human Services is currently seeking proposals from public or non-profit organizations to manage $15 million in WAP funds for multifamily projects.

New York, as previously mentioned, probably has the most experience working with multifamily weatherization (due to the prominence of multifamily housing in New York) and, as a result, already had a framework of local subgrantees in place familiar with multifamily projects. For example, one local provider described below, Community Environmental Center, has performed multifamily weatherization for decades. New York did not create a state-wide agency for multifamily projects but it added more temporary multifamily specific subgrantees, and set aside $60 million of its ARRA WAP funds for multifamily projects.

Wisconsin started a new initiative through its Department of Administration targeting 3,000 units in buildings containing twenty or more units for weatherization. Similarly, Rhode Island set aside one-third of its ARRA WAP funds for multifamily weatherization in a program administered by Rhode Island Housing and is currently accepting proposals.

While many states have taken important steps to ensure that ARRA WAP funds flow to low-income individuals living in affordable multifamily housing, four have made the most progress in developing and implementing the state-wide agency delivery model and are described below: Colorado, New Jersey, Kansas, and Pennsylvania.

A. Colorado

After identifying multifamily weatherization as a priority, Colorado's Governor's Energy Office designated long-time energy assistance nonprofit Energy Outreach Colorado as its statewide multifamily subgrantee. Along with weatherization experience, Energy Outreach Colorado had previously been engaged in year-round bill payment assistance and energy efficiency education. So far, using ARRA WAP funds, Colorado has weatherized over 1,000 multifamily units and has additionally set aside around four million dollars to fund a second round of projects.

Energy Outreach Colorado was able to set up its multifamily program in about six months and now boasts an impressive amount of program guidance and forms. Once a building is found to meet income-eligibility requirements, Energy Outreach Colorado will hire an energy auditor through a competitive bidding process and contract for a full building audit paid for by the state. The audit will be used to determine which measures result in a net savings by lowering energy costs (also known as the Savings-to-Investment Ratio, or SIR) and measures with a SIR of 1 or greater will be installed.

Upon receiving a completed scope of work—the result of the energy audit—building owners in Colorado will seek bids directly from vendors and subcontractors to procure products and install the agreed upon measures. While this process can be time consuming, Colorado sees the involvement of the building staff as a way to encourage familiarity with new products, vendors, and energy efficient systems. Colorado currently does not include the use of general contractors in its program guidance. Currently, the building owner is responsible for supervising construction and payments to contractors, and is reimbursed by the state within 15 business days of its receipt of invoices (subject to final inspection by program staff). Colorado does consider the building owner's financial situation, and will grant exceptions and will make direct payments to contractors where warranted.

Colorado's multifamily program has proceeded largely without hesitation, but did experience a few hiccups. The first was simply the speed with which Energy Outreach Colorado had to create its program from scratch and ramp up almost immediately into the production stage. Colorado had to adapt many forms developed for single-family projects and hired a law firm to draft contracts and agreements. Secondly, the energy audit software required by the Department of Energy (DOE) did not suit Colorado's unique and varied climate and Colorado was able to work with the DOE to tweak the software to perform better.

B. New Jersey

In New Jersey, the Green Homes Office of the New Jersey Housing and Mortgage Finance Agency (NJHMFA) received approximately $30.5 million to weatherize multifamily properties within its financed portfolio. NJHMFA worked closely with the state's WAP grantee, the New Jersey Division of Community Affairs (DCA) to create a state-wide multifamily program after recognizing that its existing local WAP agencies would not be able to ramp up adequately to spend the influx of ARRA funds.

The Green Homes Office started work on its multifamily program in April 2009 but was delayed by two significant roadblocks. The first was the negotiations with DCA regarding a memorandum of understanding regarding final program guidance. The second was the election of and transition to a new Governor. Once the MOU was secured and the transition completed, New Jersey published a two-part application for multifamily building owners seeking ARRA WAP funds.

The purpose of the first application, the deadline for which has passed, was mainly to screen properties for income eligibility and other basic requirements before starting the audit process. Building owners are responsible for the upfront costs of the energy audit in New Jersey, and will be reimbursed when a scope of work is approved, so the purpose of the initial application phase was mostly to avoid unnecessary audits. NJHMFA also sought to help the neediest buildings first, so it also analyzed building financials during the first application. New Jersey had fifty-eight applicants and approved thirty buildings to move on to the second application stage. All thirty buildings are expected to receive funding. All projects are now in the audit phase.

Contractors seeking to perform weatherization work must be approved, but the certification process is fairly simple. New Jersey contracted with the National Weatherization Corporation to register contractors—to make sure they are bonded, licensed, and knowledgeable of federal requirements such as Davis-Bacon Act and lead-based paint requirements. Requests for quotation are automatically sent to approved "responsible contractors." If a building owner has a preferred contractor, that business can seek certification from the state. There are also over one hundred state-approved auditors.

New Jersey does require that measures be approved and installed in order of highest SIR to lowest SIR, and measures cannot be leapfrogged. For example, if a light-bulb replacement has the highest SIR, and foam insulation has the second highest SIR, a building owner cannot receive funding for foam insulation unless a light-bulb replacement is also included in the scope of work.

New Jersey also plans to collect energy usage data from both weatherized and non-weatherized buildings as part of its Energy Benchmarking Initiative. New Jersey plans to track the energy usage of all of the properties in its portfolio dating back two years and for four future years. Local utilities have agreed to release building data so long as the owner, or tenants in submetered buildings, approves. The state hopes to collect data from approximately 350 properties and 48,000 units to prove the benefits to their weatherized properties.

C. Kansas

The Kansas Housing Resources Corporation (KHRC) has been weatherizing multifamily properties since before the passage of ARRA. Larry Bentley, the Weatherization Program Manager for KHRC, estimates that anywhere from 15%-20% of Kansas WAP money has traditionally been spent on multifamily projects—mostly focused in Kansas City and Wichita. As a result, Kansas had a network of knowledgeable contractors and four in-house auditors already in place when the state set aside 25% of its ARRA WAP funds for multifamily projects.

Unlike other state-wide program, KHRC is not the exclusive subgrantee for multifamily programs because its subgrantees have experience with multifamily weatherization projects. Most USDA and HUD properties on a list of properties meeting income-eligibility requirements promulgated by HUD as a result of a memorandum of understanding with DOE tend to apply to the state-wide office. Many multifamily projects in Kansas involve garden style apartments, but the state has also weatherized high rise buildings in Kansas City and Wichita.

KHRC employs its own auditors and manages the contractor search through a competitive bidding process.

D. Pennsylvania

While new to WAP, the Pennsylvania Housing Finance Agency (PHFA) is a long-time respected state housing agency. PHFA administers many federal and state multifamily housing programs, 44,634 units of HUD Section 8 Contract housing, the Department of Treasury Low Income Housing Tax Credit Program, the HOME program, and is an approved lender under the HUD Risk Shaving and Rural Development Section 538 Programs. As a result, PHFA is flush with expertise regarding ARRA spending administration requirements such as Davis/Bacon, safety requirements, etc.

In 2009, the Pennsylvania Housing Finance Agency (PHFA) announced a new program, Preservation through Smart Rehab, designed to help preserve Pennsylvania's stock of affordable rental units. Preservation through Smart Rehab predates ARRA. PHFA had already amassed a $1 million grant from the MacArthur foundation for use in ramping up the program, data collection activities and for paying one-half the cost of energy audits (building owners are responsible for the other half), $2 million from their own reserves, and $2 million of Rural Development preservation funds. In June 2009, PHFA was recognized by the state as a WAP subgrantee, and received $22.5 million of the state's ARRA WAP funds. Though PHFA could use its other sources of funding to conduct audits, it could not spend its ARRA WAP funds until its contract with the state was finalized in February 2010. This contract sets forth performance provisions and permits the state to reallocate funds in the event that PHFA fails to use a portion of its ARRA WAP funds by September 2010—though this pull-back is not mandatory.

WAP funds substantially increased resources available to Smart Rehab; unfortunately, PHFA soon identified WAP program requirements and practices that conflicted with Smart Rehab and PHFA's long-standing practices, and efforts continue to reach resolution.

Initial Setbacks

PHFA encountered three significant hurdles during the initial program stage that threatened to derail the use of WAP funds and the program as a whole: (1) a lack of qualified/certified energy auditors for multifamily projects, (2) a requirement for building owner contributions, and (3) a requirement to only use WAP trained contractors contracted directly by PHFA.

As PHFA prepared to launch its program, it was surprised to find few energy auditing firms with certified multifamily analysts on staff. Auditors outside of Pennsylvania were initially used and a lack of competition resulted in high audit costs. To address this problem, PHFA used a portion of its MacArthur grant and funding from the West Penn Power Sustainable Energy Fund to sponsor the Building Performance Institute (BPI) Certified Multifamily Analyst trainings in three locations around Pennsylvania. The six-day training focuses on multifamily buildings of various configurations and culminates with the BPI Multifamily Analyst Certification Exam. Steven Winter Associates, nationally recognized energy conservation and building systems consultant, conducted the trainings. To date, 33 organizations with 39 individuals received training.

Even though the training sessions took place prior to PHFA's designation as a WAP subgrantee, DOE mostly approved of the curriculum and made only a few tweaks to health and safety items. Although DOE does not approve auditors directly, all auditors are required to use one of the two DOE approved software programs to conduct audits.

Another initial problem for PHFA was the requirement that owners contribute to the costs of the weatherization project. WAP guidelines allow states to require owner contributions, but states do not have to. In Pennsylvania, owners of buildings with fewer than fifty units were expected to contribute 25% of project costs, and owners of larger buildings were expected to contribute 35% of total costs. Pennsylvania also required that the subgrantee (PHFA in this case) collect the contributions prior to the start of the work, and these contributions were placed in a fund to be used to assist other households.

PHFA quickly surmised that owners could not meet these investment levels and in mid-2009 began working with the State's Office of Energy Conservation and Weatherization to craft waiver policies and procedures. Efforts over the fall and winter culminated in the wavier process set forth in a memorandum dated April 23, 2010. The waiver is based on need, and leaves a great deal of discretion to PHFA to grant or deny the waiver. Income eligible individual owners are by default exempt. All other owners must submit a contribution waiver application to PHFA. PHFA determines the level of waiver warranted based on its judgment as to potential financial hardship or unjust enrichment of the property owner. The memorandum also allows for the contributions to be in the form of equity, loans secured by the owner, and building reserves.

The third hurdle, similar to the first, involved the lack of contractors trained and qualified to handle multifamily weatherization projects. Initially, there was only one training facility in Pennsylvania. It was also difficult to match the locations of WAP skilled/qualified contractors with the locations of participating developments. Recognizing the need for more trained contractors, the state issued a request for qualifications to develop additional training centers.

However, the need for contractors was immediate, and could not wait on the development of additional training centers. In addition, PHFA planned to use a general contractor model it had employed before the influx of ARRA cash. DOE expressed concern about the qualifications of contractors and the incorporation of multiple fees (traditional PHFA processing fees, general contractor and subcontractor fees) that would eat into available funds.

PHFA subsequently worked in partnership with the State's Department of Labor and Industry (L&I) to expand the contractor base. L&I is responsible for assisting other state departments in deployment of WAP funds through establishing and conducting training programs and reviewing qualifications of contractors who seek to perform weatherization program work. Though DOE has not yet approved the plan, PHFA and L&I reached a memorandum of understanding that recognizes the unique nature and character of rental housing, sets forth contractor bid requirements, contractor qualification review processes and permits PHFA to determine if a contractor is qualified to perform WAP work. The MOU also specifies requirements for on-site reviews of work performed and review and approval of payout requests and change orders. PHFA and L&I will cooperate in selection of eligible contractor standards and in establishing supplemental training programs for contractors targeting the unique nature of rental housing. They will also agree on appropriate protocols for monitoring and oversight of all contractors and work together to ensure that program requirements, training, contracting oversight, project reporting and record keeping protocols are followed.

Program Processes

PHFA had a head start as a WAP subgrantee. The Smart Rehab Program was already operational–program design and processes and even staff were in place by the time the state offered access to WAP funds. In fact, the Smart Rehab Program builds on PHFA's multifamily rehabilitation and development finance program design and processes tested over twenty years and the existing strength of their staff skills and systems. All Smart Rehab activities are directed by David Evans, Assistant Executive of Multifamily Housing. To date, no new staff positions were added as a result of adding WAP funds, although one existing staff person was assigned to devote 100% of his time to the program. Key staff positions assigned to implement Smart Rehab include:

POSITION	RESPONSIBILITY
Director of Development	Management
Senior Development Officer	Underwriter
Manager of Housing Services	Tenant Education
Manager of Project Operations	Project Building Eligibility Determination
Senior Financial Analyst	Owner Contribution Waiver Review
Director of Technical Services	Vet General Contractors
Manager of Architecture and Engineering	Architecture and GC Bid Response and Approval – All Technical Issues
Staff Engineer/Energy Coordinator	Training Energy Auditors, Review of Audits
Manager of Investments	Investment of WAP Funds
Finance Officer (2)	Construction Payout Processing
Technical Services Representatives (11)	On-Site Construction Inspection and Pay-Out Approval

To measure the effectiveness of the energy efficiency improvements, tenant education and on-site training of property staff, energy use will be tracked for five years following construction completion. Owners must provide PHFA with releases to obtain energy use data directly from the utility company of all project-paid utilities. Similar releases are required from a portion of the tenants for all tenant-paid utilities. PHFA has chosen to use EnergyScoreCards, an online energy management and benchmarking tool specifically designed for multi-tenant buildings to track energy use and provide on-going feedback on the property's performance following installation of the improvements.

PHFA has also been instrumental in the development of three energy conservation collaboratives. The collaboratives are made up of non-profit housing owners, private businesses, lenders and public sector representatives. Their combined geographic area covers most of the state. The first collaborative was formed as a way to share information and best practices, particularly around energy conservation and data collection. With PHFA's urging, two other collaboratives formed. Members realized they could use their "strength in numbers" to advocate for policies and new resources. One early victory was the work of the collaboratives in support of PHFA's request for flexibility and a process for waiving the WAP owner contribution requirement.

III. PROGRAM DESIGN AND IMPLEMENTATION ISSUES

As more state and local subgrantees consider use of weatherization funds for multifamily, they have encountered regulatory and other issues that affect how programs are both designed and administered. Subgrantees continue to seek guidance and modifications from DOE and state agencies, and where warranted, they have become creative in developing practices that are consistent with WAP guidelines yet adhere as much as possible to best practices of other federal and state or local housing efforts. Regulatory issues identified to date include:

- Requirement that WAP funds be disbursed as grants as opposed to loan. Where owners receive tangible improvements to their properties paid for by grants, grant income may be considered taxable regardless whether the funds flow through an owner or directly from the WAP grantee to installers/contractors. In addition, WAP grant funds cannot be used in calculating eligible basis for projects attempting to use low income housing tax credits thereby reducing the amount of private funds available to leverage WAP dollars.
- Ability and process for buying down the Savings to Investment Ratio (SIR) where less than the required 1 to 1 ratio is achieved. The ability to buy down the SIR allows more weatherization measures to be included and leverages WAP funds with private funds used in the buy-down.
- Requirement that subgrantees disburse WAP funds directly to installers/contractors as opposed to disbursements to owners who oversee the work. Disbursing funds through owners is an established best practice for multifamily housing programs particularly where there is a larger scope of work.

States and local subgrantees have also encountered other non-regulatory issues and concerns that affect their ability to spend funds in accordance with federal or state deadlines. Many areas of the country (see Pennsylvania description) do not have access to qualified auditors and/or contractors experienced with multifamily buildings and subgrantees must take steps to ensure both are available. Special outreach may be required to attract owners to the program and keep them moving through the process. Owners are unfamiliar with the weatherization program, its technologies and benefits, and may lack the financial resources and time needed to participate. Subgrantees may need to devote more time to educating owners and to tailoring processes in ways that make it more attractive and easier for owners to participate.

IV. CONCLUSION

The President set high goals for the WAP program in the ARRA and available funds are finally substantial enough to allow states to focus on reaching low-income people in multifamily housing. Tackling the multifamily market with weatherization funds is necessary not only to reach millions of eligible individuals, but also to meet the much larger program goals that have accompanied increases in funding. A state-wide subgrantee model is an important, effective and efficient tool that, combined with the success of local experienced subgrantees, expands access to multifamily owners in all parts of a state.

As more states and local subgrantees work together and share information, more "best practices" can be compiled, more evidence can be shared with DOE and lawmakers to influence policy changes, and most importantly, more low-income Americans and taxpayers can save on energy costs.

Appendix I: Performance Charts for State Weatherization Programs

All data in these charts are based off of the DOE's "Homes Weatherized by State through 03/31/2010" document and the DOE Inspector General's Report on weatherization spending from February 2010.

The states in this chart would not finish Recovery Act weatherization projects before the March 2012 deadline even if they maintained their best month's pace. These states must ramp up the pace of weatherization significantly in order to avoid squandering their WAP funding.

State	Total Projects	Total Completed	Percentage Completed	Goal Reached at Q1 2010 Pace	Goal Reached at Best Month's Pace
DANGER LEVEL					
Alaska	1,523	0	0.00%	Never	Never
New Jersey	13,054	269	2.06%	Q4 2023	Feb-2018
New York	45,400	1,336	2.94%	Q3 2020	Nov-2017
CT	7,500	501	6.68%	Q4 2013	Mar-2013
Missouri	21,506	2,418	11.24%	Q4 2013	Feb-2013
Georgia	13,871	1,555	11.21%	Q3 2013	Dec-2012
Florida	19,090	1,754	9.19%	Q1 2013	Nov-2012
Maryland	6,850	714	10.42%	Q4 2013	Oct-2012
North Carolina	22,203	1,716	7.73%	Q3 2013	Oct-2012
California	43,400	2,408	5.55%	Q2 2014	Sep-2012
Texas	33,908	2,173	6.41%	Q4 2013	Sep-2012
Colorado	10,478	2,199	20.99%	Q3 2012	Jul-2012
South Carolina	6,500	751	11.55%	Q2 2013	Jul-2012
Nebraska	4,000	537	13.43%	Q3 2012	Jun-2012
MA	16,926	2,863	16.91%	Q3 2012	May-2012
Wyoming	928	52	5.60%	Q2 2014	May-2012

States in this chart would not finish their weatherization projects by the March 2012 deadline if they maintained their Q1-2010 pace, but would beat the deadline if they maintained their best month's pace.

State	Total Projects	Total Completed	Percentage Completed	Goal Reached at Q1 2010 Pace	Goal Reached at Best Month's Pace
CONCERN LEVEL					
Wisconsin	20,678	2,642	12.78%	Q3 2012	Mar-2012
Indiana	19,736	2,946	14.93%	Q2 2012	Jan-2012
Kentucky	9,076	1,281	14.11%	Q3 2012	Jan-2012
Oklahoma	7,060	1,180	16.71%	Q2 2012	Jan-2012
Rhode Island	2,532	211	8.33%	Q4 2012	Jun-2011
Michigan	33,410	3,260	9.76%	Q4 2012	May-2011

States in this chart are those that would finish sometime in the first quarter of 2012 if they maintained their Q1-2010 pace, but would finish sometime in 2011 if they maintained their best month's pace.

State	Total Projects	Total Compl.	Percentage Completed	Goal Reached at Q1 2010 Pace	Goal Reached at Best Month's Pace
CUTTING IT CLOSE LEVEL					
Pennsylvania	29,554	3,690	12.49%	Q1 2012	Nov-2011
New Mexico	2,788	473	16.97%	Q1 2012	Aug-2011
North Dakota	3,267	655	20.05%	Q1 2012	Aug-2011
Montana	2,477	521	21.03%	Q1 2012	Jun-2011

States in this chart are those that, at either pace, will finish all weatherization projects in 2010 or 2011.

State	Total Projects	Total Compl.	Percentage Completed	Goal Reached at Q1 2010 Pace	Goal Reached at Best Month's Pace
SAFE LEVEL					
Arkansas	5,578	1,251	22.43%	Q4 2011	Nov-2011
Minnesota	16,858	3,431	20.35%	Q4 2011	Sep-2011
Alabama	6,651	1,230	18.49%	Q4 2011	Aug-2011
Ohio	32,180	10,468	32.53%	Q3 2011	Aug-2011
Utah	4,474	1,229	27.47%	Q4 2011	Aug-2011
Arizona	6,409	1,224	19.10%	Q3 2011	Jul-2011
Illinois	26,993	3,757	13.92%	Q4 2011	May-2011
Louisiana	5,136	739	14.39%	Q4 2011	May-2011
New Hampshire	2,609	744	28.52%	Q2 2011	Apr-2011
Virginia	9,193	2,453	26.68%	Q4 2011	Apr-2011
West Virginia	3,574	1,190	33.30%	Q2 2011	Mar-2011
Maine	4,427	1,306	29.50%	Q2 2011	Feb-2011
Kansas	5,820	1,270	21.82%	Q2 2011	Jan-2011
Oregon	4,635	891	19.22%	Q3 2011	Dec-2010
South Dakota	2,327	423	18.18%	Q3 2011	Dec-2010
District of Columbia	785	110	14.01%	Q4 2011	Oct-2010
Idaho	3,113	1,366	43.88%	Q4 2010	Oct-2010
Mississippi	5,468	2,460	44.99%	Q1 2011	Oct-2010
Nevada	5,539	1,570	28.34%	Q4 2010	Sep-2010
Delaware	1,526	687	45.02%	Q2 2011	Aug-2010
Hawaii	672	115	17.11%	Q2 2011	Aug-2010
Iowa	7,196	2,113	29.36%	Q4 2010	Aug-2010
Tennessee	10,524	4,131	39.25%	Q4 2010	Aug-2010
Washington	7,170	3,462	48.28%	Q3 2010	Jul-2010
Vermont	1,612	847	52.54%	Q3 2010	Jun-2010