

**STATE OF ALASKA**  
**TRAINING AND TECHNICAL ASSISTANCE (T&TA) PLAN**  
**2026-2027**

**1.0 – GENERAL INFORMATION**

COMMENTS THAT DO NOT GENERALLY FIT INTO THE AVAILABLE TABLES BELOW

The descriptions within this template will address both online and in-person classes.

**2.0 – OVERALL T&TA PLAN**

YOUR OVERALL T&TA PLAN MUST INCORPORATE SUGGESTIONS AND FEEDBACK THE FOLLOWING ELEMENTS.

**FEEDBACK FROM INTERNAL AND EXTERNAL REVIEWS, EXAMPLES INCLUDE:**

- FEEDBACK FROM DEPARTMENT OF ENERGY (DOE) PROJECT OFFICER (PO) MONITORING VISITS
- INTERNAL STATE AUDITS
- GRANTEE MONITORING OF THE SUBRECIPIENTS
- OFFICE OF INSPECTOR GENERAL (OIG) REPORTS
- AMERICAN CUSTOMER SATISFACTION INDEX FEEDBACK, AND
- OTHER. EXAMPLES INCLUDE:
  - TRAINING FEEDBACK
  - TRAINING RETENTION ACTIVITIES

Training is scheduled by the Grantee for statewide participation, usually in winter. Subgrantee agencies receive a substantial amount of TTA and they determine their own specific needs including hands on training and mentoring.

**DOE Monitoring Feedback:**

When DOE conducts an inspection process in Alaska, AHFC will participate and provided feedback of the monitoring results to all three agencies. Any training needed will be scheduled following the monitoring report results.

**State Audit Feedback:**

All three agencies receive more than \$750000 and therefore will be required to have a single audit which will be reviewed by AHFC. AHFC also conducts a fiscal audit once per year and if there are findings or concerns, they will be addressed at the time. Areas that are considered findings are discussed with the Subrecipients to help find suitable solutions or training. AHFC also conducts a Program Monitoring and a client file review of each agency and the results are shared with the subgrantee agency. During this assessment, RRP credentials are checked to make sure they are current. AHFC also conducts field monitoring which can lead to specific technical training if needed.

**Monitoring of Subrecipients:**

Under the monitoring plan and as mentioned above AHFC conducts fiscal, program, client file review and field monitoring. Notations, concerns, and findings resulting from a monitoring or inspection visit may but not always lead to comprehensive or specific training for the agency or individual in question.

When technical issues are discovered, AHFC will work with the subgrantee to find the appropriate training and decide if it is something that all agencies could benefit from.

**EXISTING OR PLANNED ACCREDITED TRAINING CENTER PARTNERSHIP OR WORKING RELATIONSHIP.**

The closest training center to Alaska is the Building Performance Center in Bellingham Washington. They have provided out EA/QCI training and certifications for years. A number of inspectors test every three years in a training house established in Fairbanks for this purpose. Those that cannot attend will go to Bellingham for training and certification. We also work with other training centers on occasion that are in the Energy Outwest network.

**PREPARATIONS FOR FUTURE/UPCOMING PROGRAM REQUIREMENTS, EXAMPLES INCLUDE:**

- **UPDATED STANDARD WORK SPECIFICATIONS (SWS)**
- **MIGRATION TO ONLINE WEATHERIZATION ASSISTANT**
- **INCLUSION OF SPECIFIC LANGUAGE FROM WEATHERIZATION PROGRAM NOTICES (WPN)**
- **HEALTH AND SAFETY GUIDANCE CHANGES**
- **ENERGY AUDIT PROCEDURES**
- **PLANNING FOR NEW CATEGORIES OF FUNDINGS SUCH AS WEATHERIZATION READINESS**

Updates to any DOE policy are shared with the network as they come out. Any changes to H&S are updated in the annual H&S plan.

The Alaska Field Guide is updated regularly as required and new additions to the SWS are adopted at that point.

WPN and Memos: Relevant WPNs and memos are sent out to the network within a day of release. Changes are discussed through email or on occasional network calls, or agencies are contacted individually to discuss how changes can be made.

Subgrantees are notified about any new funding opportunities whether they are added to the formula distribution or they are competitive.

**WHAT PROTOCOLS ARE IN PLACE WHICH ENSURE UNTRAINED STAFF ARE NOT LEFT WITHOUT SUPERVISIONS DURING FIELD OPERATIONS?**

Untrained staff does not complete any work without supervision of trained staff. Although it is encouraged to hire trained staff from the network it is not frequently possible, therefore, it is not a requirement for applicants to have training prior to hiring.

Upon hire, the employee may be required to complete the online training from Saturn Resources to give them basic energy efficiency concepts. They are also encouraged to take classes in cold climate building science offered locally. In addition, Subrecipients all have an internal training/shadowing on the job mentoring plan. Much of our employment for crews is seasonal especially in remote villages. The training is minimal due to the high turnover and most of the training is specific hands on and managed on site. These crew members are always supervised.

**Contractor Training**

AHFC allows the use of T&TA funds to train the staff of contractors who will be working with the program in all applicable job areas, and for both specific and comprehensive categories. This helps ensure that untrained staff is not left unattended at the job sites. Training is not required for contractors but may be a condition of continued work with the program if issues are discovered upon inspection. Agencies must ensure the following is met:

- Agencies must have procurement standards that align with 2 CFR 200. AHFC will monitor agencies to their own procurement standards.
- During the procurement process of contractors, agencies must include the training opportunities in their advertisements.
- Contractors may be reimbursed for all costs associated with approved training including attendance at certain conferences or in state training opportunities. Agencies must ensure training for the same activity is not billed for more than once.
- It is an allowable expense for contractors to be reimbursed for labor, and other expenses related to training such as mileage and lodging only if the above conditions are met.
- All reimbursement policies must be included in the contract and binding agreement with the contractors.
- Contractor completed training attendance certifications must be kept on file and accessible to AHFC to ensure all applicable guidelines such as WPN 22-4 are met.
- Travel and other expenses must be based on actual costs, GSA per diem rates, or state/Subgrantee policy rates.
- Agencies must have contractor specific limits for reimbursement defined in the contracts.

It is expected that the use of contractors will continue to increase for HVAC, and installers, as well as general residential contractors and crews. The majority of contractor need for training will include all of the above or wherever other needs occur.

<b>PARTNERSHIPS WITH THE STATEWIDE HOME PERFORMANCE INDUSTRY ON TRAINING ISSUES; IF APPLICABLE.</b>
NA
<b>HOW DOES ANALYSIS CONDUCTED, AS DETAILED IN SECTION V.6 OF THE ANNUAL APPLICATION, INFLUENCE THE DEVELOPMENT OF T&amp;TA ACTIVITIES AND PRIORITIES?</b>
In field monitoring and client file review the information provided by the AkWarm modeling is examined to see if the agency is choosing high SIR measures to implement. Also, the work is examined in field to see if it makes sense and aligns with the AHFC Weatherization priorities. When issues are observed in the field, appropriate training can be offered or recommended by AHFC to the agency.

### 3.0 – WORKFORCE CREDENTIALS

**DESCRIBE THE FOLLOWING ASPECTS OF YOUR T&TA PLAN RELATED TO WORKFORCE CREDENTIALS.**

<p style="text-align: center;"><b>FEDERALLY REQUIRED CREDENTIALS. EXAMPLES INCLUDE:</b></p> <ul style="list-style-type: none"> <li>• <b>ENVIRONMENTAL PROTECTION AGENCY LEAD RENOVATION, REPAIR, AND PAINTING PROGRAM</b></li> <li>• <b>HOME ENERGY PROFESSIONALS QUALITY CONTROL INSPECTOR CERTIFICATION</b></li> </ul>
<p><b><u>Installer/Crew Leader</u></b></p> <p>In some cases, crews are in house and in some cases, they are contractors. All crews working in weatherization are eligible for training.</p> <p><b><u>H&amp;S Classes</u></b></p> <p>Crew Leaders, Energy Auditors, and/or QCI Inspectors are required to have received and passed the EPA Renovation, Repair and Painting course. They are eligible to take classes on mold, asbestos, and other possible source pollutants that might be found in the home at the discretion of the subgrantee agency. Auditors and inspectors are encouraged to take OSHA 10 and 30. Crew are required to have OSHA 10 and Crew Leads are required to have either OSHA 10 and eventually OSHA 30.</p> <p><b><u>Energy Auditor</u></b></p> <p>Energy Auditors must take AkWarm training and basic cold climate building science training offered in Alaska. New auditors must take the online Saturn Resource classes that AHFC funds. They are eligible to take the Energy Auditor training class at BPA and the QCI training and certification if they choose. They can choose to take online energy auditor classes from any of the training centers as determined by their supervisor.</p> <p><b><u>Quality Control Inspector</u></b></p> <p>Each agency must have one QCI inspector ( on staff or contracted) and be identifying a second or more for training. QCI candidates must take the Saturn Resource classes on line or another online training from a Training Center for QCI prep. Then they can schedule with BPA Bellingham for a week of training and then the proctored test to become a QCI inspector. All costs associated with QCI certifications or recertifications will be eligible under the TTA budget.</p>
<p style="text-align: center;"><b>GRANTEE/STATE REQUIRED CREDENTIALS. EXAMPLES INCLUDE:</b></p> <ul style="list-style-type: none"> <li>• <b>BUILDING PERFORMANCE INSTITUTE BUILDING ANALYST</b></li> <li>• <b>GRANTEE-DEVELOPED CERTIFICATIONS</b></li> </ul>
<p>Inspectors are required to have a certification in Energy Auditor and a micro certification in QCI.</p> <p>Auditors, Inspectors, Program Managers, Crew leads and Crews are all encouraged to build a portfolio of certifications offered by BPI. All industry certifications such as Building Analyst, Energy Auditor, QCI and other BPI certifications as well as Residential Endorsement are eligible for reimbursement for anyone working in the weatherization program.</p>
<p style="text-align: center;"><b>SUBRECIPIENT/LOCAL REQUIRED CREDENTIALS. EXAMPLES INCLUDE:</b></p> <ul style="list-style-type: none"> <li>• <b>LICENSING INCLUDING HVAC, ELECTRICAL, CONTRACTOR</b></li> </ul>

A Residential Endorsement is required for subgrantees that actually perform construction work with crews in homes. All costs associated with maintaining the Residential Endorsement are eligible under TTA.

**INDUSTRY REQUIRED CREDENTIALS. EXAMPLES INCLUDE:**

- **EQUIPMENT/MATERIAL MANUFACTURE CERTIFICATION**
- **VENDOR CERTIFICATION**  
(E.G. EQUIPMENT/MATERIAL MANUFACTURE CERTIFICATION, VENDOR CERTIFICATION)

If a subgrantee contractor is working in a specialty field such as HVAC, electrical, etc. they must carry any required licensing or certifications that are required by the state or local jurisdiction. Those licenses or certifications should be present in a specific file for the contractor.

**PROCESS FOR MAINTAINING WORKFORCE CREDENTIALS**

**Subrecipients are responsible for ensuring everyone within their organization maintains each of their earned credentials.** As a credential is approaching the expiration date, the individual holding that certification will schedule review classes if necessary and arrange for the recertification process and testing with the testing center that oversees that credential. This primarily applies to QCI and RRP.

**HOW CREDENTIALS ARE TRACKED**

During the annual renewal or RFP period, the Subrecipients are required to provide existing credentials with expiration dates for each person. This may also be so reviewed during monitoring, discussed during our bi-weekly calls, and individual ongoing discussion with each agency.

## 4.0 – TRAINING

GRANTEES HAVE TWO OPTIONS TO DESCRIBE THEIR TRAINING.

- A) OR USE THE FIELDS BELOW TO IDENTIFY AND DESCRIBE THE TRAINING SCHEDULE FOR GRANTEE AND SUBRECIPIENT STAFF. INCLUDE TECHNICAL AND NON-TECHNICAL TRAINING.

GRANTEE'S ARE TO INCLUDE THE FOLLOWING IN THEIR DESCRIPTIONS REGARDLESS OF WHAT OPTION IS BEING USED TO DESCRIBE THEIR TRAINING PLAN:

- SPECIFY WHETHER ATTENDANCE IS MANDATORY, AND THE RAMIFICATIONS FOR NON-COMPLIANCE.
- SPECIFY IF THE T&TA PLAN SPANS MULTIPLE PROGRAM YEARS (PY), INDICATE WHICH TRAININGS ARE INTENDED IN THE CURRENT PY AND WHICH ARE PLANNED FOR FUTURE PYs.

**PROGRAMMATIC/ADMINISTRATION TRAINING**

**(Multi year training options and also eligible for subgrantees when needed.)**

- FINANCIAL (I.E. 2 CFR 200)
- MANAGEMENT (I.E. 10 CFR 440)
- SOFTWARE TRAINING

Financial training

2 CFR 200 training is offered annually or more frequently if requested this training covers how to understand the code, cost allocation plans, indirect costs, and procurement.

#### Procurement and Program Management

This type of training can be accessed at conferences or with specific trainers.

#### Software Training

This can be specific to an agency that is using programs for construction management or reporting. It can also be for AK Warm training or other reporting or modeling training needed.

#### **COMPREHENSIVE TECHNICAL TRAINING ALIGNED TO THE JOB TASK ANALYSIS (IDENTIFY AT WHAT INTERVALS WORKERS WILL RECEIVE REGULAR, COMPREHENSIVE TRAINING AS REQUIRED BY WEATHERIZATION PROGRAM NOTICE (WPN) 15-4)**

- QUALITY CONTROL INSPECTOR
- ENERGY AUDITOR
- CREW LEAD
- RETROFIT INSTALLER/TECHNICIAN

#### **SPECIFIC TECHNICAL TRAINING**

(MULTIYEAR OPTIONS FOR TRAINING AND THE ONES IN BOLD ARE MANDATORY-THE OTHERS ARE OPTIONAL AND RECOMMENDED AS NEEDED. THE AHFC PROGRAM MANAGER CAN REQUIRE SPECIFIC TRAINING IF IT IS NEEDED.)

- TOPICS IDENTIFIED DURING MONITORING VISIT(S)
- **ENERGY MODELING-AK WARM**
- **ENERGY AUDITOR AND QUALITY CONTROL INSPECTOR. (FOR INSPECTORS)**
- HEALTH & SAFETY. ALL H&S TOPICS IN WPN 17-7 REQUIRE SOME LEVEL OF TRAINING FOR ALL AFFECTED WORKERS, THE FREQUENCY OF THIS TRAINING IS A SUBGRANTEE DECISION. EXAMPLES INCLUDE:
  - HEATING SYSTEMS INCLUDING HEAT PUMPS
  - **ASBESTOS**
  - **BIOLOGICALS AND UNSANITARY CONDITIONS**
  - BUILDING STRUCTURE AND ROOFING
  - CODE COMPLIANCE
  - COMBUSTION GASES
  - ELECTRICAL
  - FORMALDEHYDE, VOLATILE ORGANIC COMPOUNDS (VOCs), FLAMMABLE LIQUIDS, AND OTHER AIR POLLUTANTS
  - FUEL LEAKS
  - GAS RANGE/OVENS
  - HAZARDOUS MATERIALS DISPOSAL
  - INJURY PREVENTION OF OCCUPANTS AND WEATHERIZATION WORKERS
  - LEAD BASED PAINT
  - **EPA'S LEAD RENOVATION, REPAIR & PAINTING PROGRAM (RRP)MOLD/MOISTURE**
  - PESTS
  - RADON
  - SAFETY DEVICES
  - VENTILATION AND INDOOR AIR QUALITY
    - AMERICAN SOCIETY OF HEATING REFRIGERATION AND AIR-CONDITIONING ENGINEERS

<p>(ASHRAE)</p> <ul style="list-style-type: none"> <li>○ WINDOW REPAIR, DOOR REPAIR</li> <li>○ <b>WORKER SAFETY</b> <ul style="list-style-type: none"> <li>▪ <b>OSHA 10 AND 30</b></li> </ul> </li> <li>○ ADDITIONAL TOPICS AS DESCRIBED IN HEALTH &amp; SAFETY PLAN</li> <li>• CLIENT EDUCATION (TRAINING WORKERS TO CONDUCT CLIENT EDUCATION). EXAMPLES INCLUDE: <ul style="list-style-type: none"> <li>○ ENERGY SAVINGS STRATEGIES</li> <li>○ PROGRAM-SPECIFIC INFORMATION. EXAMPLES INCLUDE: <ul style="list-style-type: none"> <li>▪ WHAT TO EXPECT</li> <li>▪ ADDITIONAL RESOURCES</li> </ul> </li> <li>○ HEALTH &amp; SAFETY ISSUES</li> </ul> </li> </ul> <p>OTHER SUBJECTS AS IDENTIFIED BY AHFC OR SUBGRANTEE STAFF</p>	<p>These trainings will be coordinated by the Grantee when there are enough possible participants. Otherwise, these are also eligible for subgrantee training or for individuals to attend.</p> <p>(MULTIYEAR OPTIONS FOR TRAINING AND THE ONES IN BOLD ARE MANDATORY-THE OTHERS ARE OPTIONAL AND RECOMMENDED AS NEEDED. THE AHFC PROGRAM MANAGER CAN REQUIRE SPECIFIC TRAINING IF IT IS NEEDED.)</p> <p>Cold Climate Air Source Heat Pump installation and design Infrared Thermography <b>OSHA 10 hours for Construction Crews, and/or OSHA 30 for Construction Supervisors</b> ASHRAE <b>Lead RRP- Assessors and Construction Supervisors</b> Lead RRP recommended for long term crews and contractor workers as well AHERA (Asbestos) HVAC Electrical training Residential Construction Plumbing Radon Health Home Evaluator Solar both assessment and installation of modules Utility Analysis Building Science Principles Administrative and Business Training Basic academic skills Project Management Transitioning to Supervisor <b>Energy Auditor/QCI for Inspectors</b> Energy Auditor/QCI for Assessors and Supervisors recommended</p>
<p style="text-align: center;"><b>CONFERENCES. EXAMPLES INCLUDE:</b></p> <ul style="list-style-type: none"> <li>• <b>ENERGY OUT WEST</b></li> <li>• <b>BUILDING PERFORMANCE ASSOCIATION</b></li> </ul>	

<ul style="list-style-type: none"> <li>• <b>EE NOW AND OTHER AHFC SPONSORED TRAINING</b></li> <li>• <b>NATIONAL ASSOCIATION FOR STATE AND COMMUNITY SERVICE PROVIDERS</b></li> <li>• <b>COMMUNITY ACTION PARTNERSHIP</b></li> </ul>
<p>NASCSP, HPC, and Energy Out West conferences are allowable. Agencies must use their Specific training budget for these conferences. Other conferences focusing on Building Science, Cold Climate Construction, are also eligible. If not identified specifically, submit a written request for the AHFC Program Manager.</p> <p>Conference training can be made available to contractors when appropriate. Contractors will follow the same protocol as the agency staff if T&amp;TA funds are used and will be required to fully attend each session available. Agencies are expected to obtain the full use of information gathered from the conferences. This includes attendance to all classes, updates, and sessions in addition to utilizing as much networking with other states as possible. T and TA funds may not be used to pay for anyone attending a conference that does not attend the accompanying classes or sessions.</p>

<p><b>5.0 – TECHNICAL ASSISTANCE</b></p> <p>DESCRIBE THE TECHNICAL ASSISTANCE ACTIVITIES INCLUDED IN THE T&amp;TA BUDGET CATEGORY.</p>
PROGRAMMATIC/ADMINISTRATION SUPPORT
<p>In addition to the Training Program, AHFC meets with Subrecipients regularly throughout the year to discuss emergent issues. This type of communication helps maintain consistency in the services provided throughout the state. Each of these meetings will serve a core group of the weatherization workforce, in addition to including a gathering of program directors to discuss the program. These meetings can include a Program Director round table and, when necessary, staff discussion covering a specific topic, including fiscal, administrative, technical intake and client education issues. The goal of the program is to have two in person peer exchanges and numerous virtual meetings with all agencies.</p> <p>Agencies reach out to AHFC on a regular basis with administrative questions. It is our practice to provide accurate answers within a timely manner to prevent mistakes and keep production flowing.</p> <p>Agency to agency peer exchanges is allowable.</p>
TECHNICAL SUPPORT
<p>Technical support will be provided by AHFC for any agency needing specific training and/or one on one meetings with AHFC staff.</p>
HEALTH & SAFETY SUPPORT ACTIVITIES
<p>Health and Safety is continuously assessed and discussed throughout the year during monthly technical calls, desk monitoring, and unit inspections. Dialogue also takes place on an as needed basis between the field staff and AHFC program managers (with health and safety questions,</p>



comments or issues noticed from monthly reporting or day to day routine assessments. All this communication can result in Comprehensive or Specific training that can be anything from structured classroom setting to “ride alongs” where the instructor accompanies the crew on an actual job site.

At any point if an agency or individual feels more health and safety training is needed, AHFC and the agency will work together to find the soonest viable option for that request.

All Subrecipient/contractor field staff will be required to complete OSHA 10 training as soon as possible to reduce possible personal injuries in the field.

When agencies are monitored, both the Health and Safety of the agency culture for staff is examined and the health and safety practices for the clients. This includes desk monitoring and day to day interactions with the agencies.

#### **MONITORING**

**WHAT PERCENTAGE OF T&TA FUNDING IS ALLOCATED TO MONITORING? (IF DEFINED IN SECTION B OF THE BUDGET DETAILS WITHIN THE ANNUAL APPLICATION, INCLUDE THAT WITHIN YOUR DESCRIPTION BELOW.)**

The costs of monitoring in the field varies widely from agency to agency. All costs of on-site monitoring of the homes are eligible cost under TTA. The cost of Program monitoring, client file review, fiscal monitoring and any meetings between AHFC and the subrecipients are also eligible under the TTA budget.

#### **OTHER, PLEASE SPECIFY**

DESCRIBE OTHER TECHNICAL ASSISTANCE ACTIVITIES HERE

### **6.0 CLIENT EDUCATION**

**DESCRIBE WHAT CURRENT AND PLANNED CLIENT EDUCATION MATERIALS AND/OR ACTIVITIES ARE INCLUDED IN THE T&TA BUDGET CATEGORY. ONLY THOSE PAID FOR WITH T&TA FUNDS NEED TO BE MENTIONED.**

**NOTE: THIS DOES NOT INCLUDE TRAINING WORKERS TO DELIVER CLIENT EDUCATION. THIS SHOULD BE DESCRIBED IN THE TRAINING SECTION, ABOVE.**

CLIENT EDUCATION ACTIVITIES PRIOR TO, DURING AND AFTER WEATHERIZATION WHICH ADDRESS THE WEATHERIZATION PROCESS AND ENERGY SAVINGS DETAILS

In tandem with a well-trained workforce, a well-informed consumer will help make best choices in maximizing effect of weatherization measures. Understanding measures to be implemented at a home is key to garnering homeowner and occupant cooperation during installation and afterward. A list of all sections that specifically spell out what needs to be delivered to the clients has been given to the Subrecipients and the Subrecipient utilization of these topics are currently part of what monitoring, and unit inspections include.

CLIENT EDUCATION ACTIVITIES REGARDING H&S ISSUES AS INDICATED IN WPN 22-7

- HEATING SYSTEMS
- ASBESTOS
- BIOLOGICALS AND UNSANITARY CONDITIONS
- BUILDING STRUCTURE AND ROOFING

- CODE COMPLIANCE
- COMBUSTION GASES
- ELECTRICAL
- FORMALDEHYDE, VOLATILE ORGANIC COMPOUNDS (VOCs), FLAMMABLE LIQUIDS, AND OTHER AIR POLLUTANTS
- FUEL LEAKS
- GAS RANGE/OVENS
- HAZARDOUS MATERIALS DISPOSAL
- INJURY PREVENTION OF OCCUPANTS AND WEATHERIZATION WORKERS
- LEAD BASED PAINT
- EPA'S LEAD RENOVATION, REPAIR & PAINTING PROGRAM (RRP)MOLD/MOISTURE
- PESTS
- RADON
  - AGENCIES MUST FOLLOW WPN 22-7 AND EXPLAIN POTENTIAL RISK OF INCREASING RADON LEVELS WHEN BUILDING TIGHTNESS IS IMPROVED, PROVIDE A LIST OF PRECAUTIONARY MEASURES, WEATHERIZATION BENEFITS, AND CONFIRM THAT "A CITIZEN'S GUIDE TO RADON" WAS RECEIVED.
- SAFETY DEVICES
- VENTILATION AND INDOOR AIR QUALITY
  - AMERICAN SOCIETY OF HEATING REFRIGERATION AND AIR-CONDITIONING ENGINEERS (ASHRAE)
- WINDOW REPAIR, DOOR REPAIR
- WORKER SAFETY
  - OSHA
- ADDITIONAL TOPICS AS DESCRIBED IN HEALTH & SAFETY PLAN
- USE OF HEAT PUMP
- OTHER SUBJECTS AS IDENTIFIED BY AHFC OR SUBGRANTEE STAFF