



## **HIGH ROAD STANDARDS AND BENEFITS**

**Updated January 11, 2012**

### **INTRODUCTION**

Clean Energy Works Oregon (CEWO) was formed as a result of a United States Department of Energy (USDOE) grant investment in a statewide scale-up of the 500 home Portland pilot program that tested new ways of delivering energy efficiency to homeowners. Clean Energy Works Oregon is intended to save energy, reduce carbon emissions, improve home comfort and home values, and create new jobs and long-term business opportunities, employment opportunities and career pathways for Oregon residents.

The City of Portland established Clean Energy Works Oregon as an independent organization to deliver, within a 3-year grant period, the following results:

- Create a scalable, replicable, self-sustaining model for delivering energy efficiency retrofits
- Transform the energy efficiency finance sector
- Leverage capital at the rate of 5:1 (activate \$100 million of investment above the Federal contribution)
- Achieve at least 6,000 residential retrofits and 3.5 million square feet of commercial building retrofits<sup>1</sup>
- Activate or retain 1,300 quality jobs

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<sup>1</sup> These High Road Standards currently apply exclusively to the residential activity of CEWO. When commercial retrofits begin, High Road standards related to them will be established and applied.

- Energy savings of more than 300,000 MBTUs
- Measure-life carbon dioxide reductions of 200,000 metric tons

The Portland pilot's Community Workforce Agreement established high-quality work standards while ensuring access and support for underserved populations. To date, pilot results show nearly half of the hours worked being done by people of color, nearly three quarters of employees being provided health insurance and 23 new hires. Over 20% of the pilot construction dollars were paid to historically underrepresented firms. Clean Energy Works Oregon will build upon these successes, as well as further develop the goals, targets, definitions and metrics of the statewide effort in the following High Road standards strategy. It will ensure that all contractors are abiding by rigorous standards and that high-quality, family-supporting jobs are created. The High Road standards are broad enough to encompass each community's particular social and economic equity concerns, but clear enough to be measurable and meaningful.

## **I. GUIDELINES**

- Clean Energy Works Oregon is a model for saving energy, creating jobs, improving homes, reducing carbon emissions and promoting equity by creating economic opportunities and career pathways for historically underrepresented people or economically disadvantaged people, including people of color and women, veterans and disabled individuals, and
- Clean Energy Works Oregon is committed to growing construction businesses and a clean economy that puts people back to work and provides new employment opportunities to disadvantaged communities in the energy efficiency sector, and
- The High Road standards reflect the following guidance the Office of

Management and Budget has given to agencies implementing American Recovery Reinvestment Act programs (OMB April 3, 2009):

- a. Ensuring compliance with equal opportunity laws and principles;
  - b. Promoting local hiring: Departments and agencies should seek to maximize the economic benefits of a Recovery Act-funded investment in a particular community by supporting projects that seek to ensure that the people who live in the local community get the job opportunities that accompany the investment;
  - c. Providing maximum practicable opportunities for small businesses;
  - d. Providing equal opportunity for Disadvantaged Business Enterprises;
  - e. Encouraging sound labor practices: The federal government invests substantial resources in enforcing wage and hour, occupational safety and health, and collective bargaining laws, to ensure that American workers are safe and treated fairly. All other things being equal, agencies awarding Recovery Act funds should seek to support entities that have a sound track record on these issues and are creating good jobs. This will strengthen the recovery effort and the economic prospects of American workers; and
  - f. Engaging with community-based organizations.
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- Clean Energy Works Oregon is building upon the valuable experience of numerous stakeholders in the Portland pilot who have worked hard in a short period of time to identify the ways in which this program can be successful while setting high standards for inclusive economic development and broad community benefits.

## **II. GOALS AND TARGETS**

Because of the unique contractual and legal framework of Clean Energy Works Oregon, and because of the variation among different Oregon communities, there are some desired standards and community benefits that cannot be achieved

simply by applying universal criteria to all contractors participating in the project. Ensuring equity, local economic vitality, and broad opportunity in the program will require assembling an applicable mix of contractors in the overall pool, organizing community expertise in support of the goals, and establishing minimum qualifications for and requirements on all contractors.

Therefore, Clean Energy Works Oregon is committed to upholding the following High Road standards, through minimum requirements for contractors, incentives to encourage excellence, and support for assistance as needed. For these standards, the terms “historically underrepresented and underutilized ” can include women and people of color, and the term “economically disadvantaged” can include veterans, disabled individuals, formerly incarcerated people and low-income residents.

1. **Local Hire:** At least 80% of workers participating in Clean Energy Works projects will be residents of their local community. Additionally, participating businesses will be locally owned. “Local” is to be defined as within a 50-mile radius of the project, unless otherwise defined by the local community.
2. **Family Supporting Green Jobs:** Workers participating in Clean Energy Works retrofit projects will earn no less than the higher of either 180% of Oregon state minimum wage, or CEWO family-supporting wage rates<sup>2</sup> for residential weatherization work.
3. **Health Coverage:** Employees on Clean Energy Works projects will receive either a) health insurance<sup>3</sup> that covers themselves or b) additional wages at not

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<sup>2</sup> Refer to Exhibit A for CEWO family-supporting wage rates.

less than \$2.50 per hour in lieu of health coverage.<sup>3</sup>

4. **Diverse Workforce:** Historically underrepresented and economically disadvantaged people will perform not less than 30% of total trades & technical project hours. Contractors will have a first source hiring agreement with designated training providers to meet this goal.
5. **Diverse Business Participation:** Businesses owned by historically underrepresented or underutilized people will make up not less than 20% of all dollars in Clean Energy Works Oregon projects. While there will be meaningful business support for all contractors in Clean Energy Works Oregon projects, there will be additional support, particularly related to impacts of historical underrepresentation, for businesses owned by historically underrepresented people, with the intention that they have the opportunity to overcome historical barriers to compete successfully in the marketplace.
6. **Highly Skilled Workforce:** Resources for continuing education and certification are available for those coming into the industry as well as those wanting to increase their opportunities for upward mobility within the industry through registered apprenticeship and other career pathways trainings.

### III. INDIVIDUAL CONTRACTOR QUALIFICATIONS AND REQUIREMENTS

To ensure that Clean Energy Works Oregon meets the goals and targets for creating good jobs, local economic vitality, social equity and quality work described above, individual contractors must meet the following minimum criteria to be considered for the Clean Energy Works pool of participating contractors:

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<sup>3</sup> Contractors are allowed to offer an hourly differential in lieu of healthcare for the first six months of participation, after which they must provide health insurance for the employee (See Exhibit B).

- A. Contractors and their sub contractors will pay wages that are at least 180% of Oregon state minimum wage, unless CEWO family supporting wage rates for residential weatherization and energy efficiency retrofit work is higher, in which case the higher wage requirement will apply.<sup>4</sup>
  
- B. Contractors and their subcontractors will provide health coverage for all employees, or pay additional wages at not less than \$2.50 per hour in lieu of benefits.<sup>5</sup>
  
- C. Contractors will have sufficient skills to conduct energy efficiency retrofits and weatherization projects with a high degree of quality and customer satisfaction, such skills to be demonstrated by approval as an Energy Trust Home Energy Solutions Trade Ally, specializing in Home Performance with Energy Star, and Building Performance Institute (BPI) affiliates. Contractors must have at least one BPI certified technician on staff. Contractors will be asked to provide a roster of all employees listing the certification and/or trainings of each employee.
  
- D. Contractors and sub contractors will use a highly skilled workforce.

100% of new entry level worker/installer weatherization employees will be hired from a designated training provider, as described in section V, until 50% of contractor's total non-supervisory worker/installer weatherization employee monthly work hours on covered projects are performed by graduates of a designated training provider program.

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<sup>4</sup> Refer to Exhibit A for CEWO family supporting wage rates.

<sup>5</sup> Contractors are allowed to offer an hourly differential in lieu of healthcare for the first six months of participation, after which they must provide health insurance for the employee (See Exhibit B).

This provision is waived if no training provider has yet qualified under section V; if all graduates of designated training providers are currently employed in weatherization work or have waived their priority employment status; if the contractor can demonstrate that no suitable graduates of designated training providers are available; or if no training provider has the capacity or ability to train or test experienced new hires to USDOE standards within a reasonable time and at reasonable cost, as determined by the High Road Committee.

- E. Contractors listed on the Federal Excluded Parties List System (<http://www.epls.gov/>) or by the Commissioner of the Bureau of Labor and Industries under ORS 279C.860 as ineligible to receive a contract or subcontract for public works will not be eligible.
  
- F. Contractors will demonstrate a history of compliance with federal and state laws, including labor law and wage and hour laws.
  
- G. Contractors will utilize a safety-trained workforce in which all on-site workers have completed an OSHA 10-hour safety course and an Environmental Hazard Awareness Course through a qualified training provider. Lead paint renovation and removal certification to perform work shall also be required for on-site workers.
  
- H. Contractors will sign a labor peace agreement that will include provisions that an employer will not take any action nor make any statement that directly or indirectly states or implies any opposition by the employer to the selection by its employees of a collective bargaining representative; that a labor organization can obtain recognition as the exclusive collective bargaining representative by demonstrating to an agreed upon neutral

third-party provider that a majority of the employees in a bargaining unit have shown their preference to have the labor organization be their representative by signing authorization cards indicating that preference; that prohibits the labor organization from engaging in any picketing, work stoppages, boycotts or any other economic interference with the construction conditions or negotiation thereof to final and binding arbitration; and that any dispute over what constitutes an appropriate bargaining unit will be determined by a third party.

- I. After each completed project, contractors will report their data on workforce diversity, subcontracting, workforce certification status, wages and benefits, and other issues relevant to the High Road standards. Elements of these reports can be made available to members of the public upon request and homeowners as they are selecting contractors. Resources will be directed toward easing reporting burdens on contractors.
- J. Contractors and subcontractors will commit to list their job openings related to CEWO through WorkSource Oregon when there is a need for an external hire. Contractors are not obligated to hire through WorkSource, and a commitment to list new jobs through Work Source would not apply to any pre-negotiated hiring agreements employers have established with the Trades.
- K. Contractors will hire at least 80% of their new employees from the local community.
- L. In general, contractors will possess certifications that qualify the contractor for the maximum current state and/or federal cash incentives and/or state and federal tax credits or other financial incentives that allow the customer to obtain quality work performed under the program for the lowest cost.



#### **IV. ESTABLISHING A CONTRACTOR POOL TO ACHIEVE TARGETS AND GOALS**

Beyond the minimum requirements and qualifications to participate, below are the methods for selecting and supporting a pool of qualified contractors that can help produce the above High Road standards and community benefits.

##### **A. Proportional Allocation for Best Value Contracting**

*Best Value Contracting* – Clean Energy Works Oregon, with assistance from the statewide High Road committee, shall employ a “best value contracting” approach to selecting contractors for the pool during the solicitations for participating contractors. In this approach, applications from contractors applying to be part of the pool will be scored on a range of desired attributes. Final selections will be made based on the highest scores and the need to create a pool with the right mix of attributes to achieve the above stated High Road goals and targets for Clean Energy Works Oregon.

Each contractor will be given a proportional allocation of streamlined projects based on their respective application scores. Through this best value contracting approach – and in reference to the goals above – preference will be given to contractors that meet the following criteria (note: these criteria may be adjusted or expanded):

- 1.** Have an exemplary record of customer service.
- 2.** Demonstrate the ability to perform high-quality retrofit work.
- 3.** Have a successful track record in hiring and retaining historically underrepresented or economically disadvantaged people and demonstrates efforts to provide employment opportunities to individuals who are seeking self-sufficient career pathways in weatherization and construction. (Newer

contractors can receive preference by providing a detailed plan for how they will hire, maintain, and welcome diversity in their workforce in the immediate future.)

4. Have a well described plan on establishing “Team” (also referred to as “Mentor-sub”) relationships with provisional contractors, in areas where there are no other qualified contractors available, which may be businesses owned by historically disadvantaged or underrepresented people who have been in business for a minimum of 6 months, and who will receive a significant amount of work on projects while they are seeking necessary training and experience toward BPI certification to be considered for the permanent contractor pool.
5. Have a well-described plan for establishing sub-contracting relationships with businesses owned by historically disadvantaged or underrepresented people who have been in business for a minimum of 6 months.
6. Recognize the value of quality training for employees by participating in registered apprenticeship and other credential-granting programs.
7. Provide employer-paid health coverage for employees and their dependents.
8. Provide employer-paid training benefits that allow employees to earn new credentials in the residential retrofit sector or pursue career opportunities in other areas of the construction or energy industries.

#### **B. Contractor Marketing and Demand Creation**

Contractors are encouraged to create demand for this program and attract customers through their own marketing and outreach. If a CEWO-qualified contractor produces their own successful retrofit lead, the project will not count against their proportional allocations; they are free to drive their own demand. Clean Energy Works Oregon will help foster relationships between contractors and community groups in order to streamline and support these outreach efforts. By partnering with local organizations, contractors can contribute to creating demand for energy efficiency retrofits, thereby helping to create more work for the

community and advance the high road goals. Resources will be directed toward assisting businesses owned by historically underrepresented people to be successful as they compete with any larger firms in the contractor pool.

### **C. Contractor Business Development**

If a contractor applies to Clean Energy Works Oregon and does not earn enough points to be accepted into the contractor pool but shows adequate capability, willingness and potential to succeed, they may be directed to the Clean Energy Works Oregon Contractor Business Support pathway, where they will have the opportunity to advance their qualifications in order to reach acceptance. This may include, but not be limited to:

1. Connecting with qualified training providers for workforce hiring assistance
2. Coaching on excellent customer service techniques, marketing, business systems management
3. Certification scholarship opportunities

### **D. Provisional Acceptance into the Contractor Pool**

Clean Energy Works Oregon is committed to supporting local emerging businesses with the ability to expand in their local community. If a contractor does not earn enough points in their application to be accepted into the contractor pool, but is located in a community where there are no other CEWO-qualified contractors available, they will be provisionally accepted into the Clean Energy Works contractor pool and are therefore required to partner with a current CEWO-qualified contractor to get support and build a teaming relationship. After 6 months, the provisional contractor will be reviewed for permanent acceptance into the contractor pool, or be given further suggestions for improvement and be asked to re-apply.

## **V. QUALIFIED TRAINING PROVIDERS**

Clean Energy Works Oregon and the statewide High Road committee shall identify a pool of qualified training providers to create a pipeline of opportunities from recruitment to placement through retention.

To be designated as a qualified training provider, a training provider will:

1. Provide weatherization training based on curriculum developed by an accredited organization that aligns with or exceeds BPI standards.
2. Provide training on any additional specifications and standards designated by the US Department of Energy and the Energy Trust of Oregon.
3. Provide training that includes health & safety, as well as hazardous material recognition, as defined by the BPI standards or equivalent, including CAZ, CO monitoring, ventilation requirements, and MSDS of worksite materials.
4. Have at least one defined partnership with state recognized pre-apprenticeship programs or signatory community organizations that serve historically underrepresented or economically disadvantaged populations.
5. In conjunction with those partner organizations, ensure that a majority of its trainees are historically underrepresented or economically disadvantaged people.
6. Agree to list their current graduates with Worksource to provide a centralized resource for contractors.
7. Offer mentoring, follow-up monitoring and/or other support to assure retention of participants in the program and in weatherization careers.
8. Demonstrate a track record of graduating and placing trainees from historically underrepresented or economically disadvantaged populations.

A qualified training provider will not be required to provide trainees or graduates to a contractor that has not signed an agreement with the training provider or a sponsor union.

## **VI. ASSISTANCE TO CONTRACTORS AND TRAINING PROVIDERS**

Clean Energy Works Oregon will engage partners to provide support to contractors that are participating in the program, recognizing that while all contractors will benefit from support, businesses owned by historically underrepresented people should have targeted support to increase their participation in the project.

Clean Energy Works Oregon and the statewide High Road Committee will work together to identify a revenue source for the purpose of providing support to training providers and businesses. When a contractor is accepted into the Clean Energy Works Oregon pool, they will go through an orientation within roughly three weeks, which will include three major courses:

1. **Marketing:** Contractors will be trained on proper messaging and effective outreach techniques, as well as CEWO marketing strategies, an overview CEWO target customers, and Co-op advertising availability.
2. **High Road:** Contractors will learn tips on high road compliance and data reporting, hiring protocols and training programs, as well as cultural competency and harassment-free workplace training.
3. **Business Support:** Contractors will connect with business resources and learn more about available assistance on: business management, expansion, field efficiency and accounting, among other topics.

The types of support that training providers may receive include, but are not limited to:

1. Funding for qualified training providers who provide a focus on training for weatherization,
2. Funding for pre-apprenticeship programs and other programs that focus on connecting historically underrepresented or economically disadvantaged populations to jobs and careers in weatherization and construction,
3. Scholarships to provide opportunities for individual weatherization workers to participate in designated weatherization certifications (BPI) as part of an

articulated Green Career Pathway.

## **VII. ACCOUNTABILITY**

### **A. High Road Committee**

Clean Energy Works Oregon and the statewide High Road committee will be accountable for progress toward, and enforcement of, the High Road standards.

The High Road Committee will:

- Help set standards and community benefits
- Help set accountability strategies for non-compliance and recognition of excellence in complying with or going beyond standards
- Evaluate progress toward standards and community benefits
- Help develop a list of qualified training providers
- Recommend actions to improve progress toward standards and community benefits, including but not limited to:
  - a. Identifying additional contractors to be brought into the pool
  - b. Designating qualified training providers
  - c. Adjusting weighting on Best Value Contracting measures
  - d. Offering additional training and business support

The High Road committee will be appointed by Clean Energy Works Oregon and will be comprised of representatives from around the state of local government, community stakeholders, business and labor.

The committee shall represent a mix of the stakeholders and be comprised of not less than 30% historically disadvantaged or underrepresented people.

### **B. Database Platform and Compliance**

Clean Energy Works Oregon will provide a centralized database platform where contractors will be required to enter their project information, including wages paid, healthcare provided, worker hours and characteristics, and location of the

project, among other items. The database will have mechanisms in place to flag any issues of non-compliance. When such an alert occurs, CEWO will contact that contractor in order to confirm the accuracy of the violation, clarify the reasons for the violation and to implement corrective action procedures.

In addition, effective and routine third party monitoring procedures that do not impact homeowners will be employed by CEWO. This will include a comprehensive annual audit of each participating contractor to verify their data reporting, employee makeup, update their business characteristics, and reward them for improvements or exemplary performance.

If a contractor is repeatedly in non-compliance, she or he will be dismissed from the Clean Energy Works Oregon contractor pool and no longer allowed to participate in the program.

## EXHIBIT A:

### 2012 CLEAN ENERGY WORKS OREGON WAGE STANDARD

#### SUMMARY

Clean Energy Works Oregon (CEWO) ensures family-supporting jobs in its High Road standards. We learned from the Portland pilot that it is important to have our wage rates reflect the prevailing wages of the region for this type of work, both to remain competitive to the market rates and to ensure we are in line with current industry and union wage standards. Other parts of the country are also developing wage standards in their High Road agreements and it is valuable to look at their examples and strategies in order to devise appropriate rates.

CEWO has conducted a comprehensive analysis of regional rates and national examples, as well as received extensive input from community, labor and employer leaders. From this process, CEWO will require a 2-tiered wage standard based on job category and region that is replicable across the state and reflects both competitive and living wage rates. These rates are wage *floors* and are in place to prevent undercutting of wages by contractors in the field and to ensure family-supporting jobs for local communities. Additionally, these base rates do not include any fringe benefits that may also be provided by employers.

CEWO WAGE FLOORS		
	BASIC	SPECIALIZED
RURAL	180% of state min. wage	200% of state min. wage
METRO		250% of state min. wage

“BASIC” means basic weatherization work, including minor repairs, batt insulation, blown insulation, weather stripping, air sealing, caulking, minor and incidental structural repairs, duct sealing and roofing.

“SPECIALIZED” means any program work that is not Basic, including without limitation, replacement of doors and windows and carpentry work; the maintenance, repair or replacement of furnaces, ducting or other HVAC equipment; replacement of water heaters and other plumbing fixtures; and all electrical work.



Clean Energy Works Oregon is subject to EEAST<sup>6</sup> legislation requirements, and so all workers must be paid at least 180% of state minimum wage.

For the wage rates listed above, **METRO** regions include:

- Region 2: Clackamas, Multnomah, Washington
- Region 3: Polk, Marion, Yamhill
- Region 5: Lane
- Region 8: Jackson, Josephine

All other regions are considered **RURAL**.

### **Apprenticeship**

Allowable if contractor is a registered training agent and employee is a registered apprentice with the State: <http://www.oregon.gov/BOLI/ATD/>. Contractors are required to pay the higher of State mandated apprentice wage rates or 180% of minimum wage.

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<sup>6</sup> Oregon Energy Efficiency and Sustainable Technology, see [http://www.oregon.gov/ENERGY/LOANS/EEAST/EEAST\\_Contractor\\_Cert.shtml](http://www.oregon.gov/ENERGY/LOANS/EEAST/EEAST_Contractor_Cert.shtml)

## EXHIBIT B:

### 2012 CLEAN ENERGY WORKS OREGON HEALTHCARE STANDARD

Clean Energy Works Oregon requires that all prime contractors provide employer-subsidized health coverage for their employees.<sup>7</sup> We have learned that defining health coverage is important, both to ensure a level playing field among participating contractors and in order to have clarity for all partners and participants about CEWO expectations and standards. Through working with expert healthcare brokers, as well as community and employer leaders, CEWO has developed a range of parameters that define health coverage for our CEWO contractors and their employees.

All Clean Energy Works Oregon (CEWO) contractors are required to provide health insurance for all employees as outlined, six months after the date of local launch for their jurisdiction:

Component	Option 1	Option 2	Option 3	Option 4
% Premium employer paid	At least 50%	At least 60%	At least 75%	At least 100%
Deductible	\$500 or less	\$1,500 or less	\$2,000 or less	\$3,000 or less
Max out-of-pocket (including deductible)	Not to exceed \$6,000			

Additionally, CEWO healthcare requirements are expected to improve over time. Our goals over the next year are to achieve:

**July 2012: minimum at least 75% of employee premium**

**January 2013: minimum 100% of employee premium**

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<sup>7</sup> CEWO contractors are required to provide health insurance to their employees six months after the date of local launch for their jurisdiction.

Clean Energy Works Oregon had the opportunity to gather extensive input from labor, community, and employer leaders who serve on our High Road Committee, as well as members of the Healthcare Subcommittee. CEWO would like to thank these partners for taking the time to review our ideas and give expert feedback, which were then integrated into our policy decisions. Partners included:

- Ben Nelson, Laborers Union
- Don Macodrum, The Home Performance Contractors Guild of Oregon
- Ben Peterson and Ernie Garcia, Montgomery and Graham, Inc. Benefits Brokers
- Bev Logan, The Metropolitan Alliance for a Common Good
- Michael Heumann, Metropolitan Alliance for a Common Good
- Amy Robinson, Balanced Energy Solutions
- Thomas Staten, Neil Kelly
- Mitt Jones, Sensible Energy Solutions
- Connie Ashbrook, Oregon Tradeswomen, Inc.
- Ken Centner, Oregon Energy Coordinators Association
- Tony Jones, Metropolitan Contractors Improvement Partnership
- Karen Goat, Green Hammer

## EXHIBIT A: HEALTHCARE FAQs

Below are some answers to frequently asked questions regarding the Clean Energy Works Oregon (CEWO) participating contractor health insurance requirements, which take effect six months after local launch for each participating jurisdiction.

- What are the health insurance parameters for CEWO contractors for 2012?

Component	Option 1	Option 2	Option 3	Option 4
% Premium employer paid	At least 50%	At least 60%	At least 75%	At least 100%
Deductible	\$500 or less	\$1,500 or less	\$2,000 or less	\$3,000 or less
Max out-of-pocket (including deductible)	Not to exceed \$6,000			

Additionally, CEWO healthcare requirements are expected to improve over time. Our goals over the next year are to achieve:

**July 2012: minimum at least 75% of employee premium**

**January 2013: minimum 100% of employee premium**

- What if I go beyond the above listed parameters?
  - As with past contractor applications, CEWO will continue to recognize and credit those contractors who provide more comprehensive coverage, including family and dependent coverage.
  
- How will CEWO confirm that I am in compliance with the health insurance coverage requirements?
  - CEWO will conduct annual 30-minute office audits of all contractors; verifying health insurance plans, wages paid, employee makeup and subcontracting relationships, among other information. These will be brief and will include recognition of areas for improvement and areas of excellence.

- What about subcontractors?
  - CEWO is only requiring the above health insurance coverage for our prime contractors at this time. If subcontractors do not provide healthcare to their employees, they are still required to pay at least \$2.50 per hour in lieu of health insurance coverage.
  
- What about sole proprietors?
  - CEWO does not require that sole proprietors without employees secure health insurance. CEWO is primarily concerned with ensuring that all employees have health coverage.
  
- What if an employee is a new hire?
  - We encourage contractors to provide health insurance for employees as soon as possible. For new hires, CEWO allows for a probationary period of up to 90 days, after which time the employee must have health insurance coverage pursuant to these program requirements.
  
- What if an employee “waives” health insurance coverage?
  - An employee wishing to waive insurance coverage must complete (including identification of alternative insurance coverage, if any) and sign the attached Employee Health Insurance Waiver Certification. Contractor shall maintain and make available to CEWO all Employee Health Insurance Waiver Certifications, as applicable.
  - If a CEWO contractor offers health insurance coverage pursuant to these program requirements and the employee willingly waives health insurance by completing and signing the attached Employee Insurance Waiver Certification, the contractor is not required to pay the additional \$2.50 per hour rate.
  - It is CEWO’s priority that employees have health insurance. CEWO will regularly monitor the number of waivers and reserves the right to audit Contractor’s in its discretion.
  - CEWO reserves the right to change the waiver policy at any time.



