REFERENCES

- Federal Register, Department of Health and Human Services (HHS) Annual Update of the HHS Poverty Guidelines
- Department of Energy Weatherization Program Notice 3 (of current year)

PURPOSE

Title IV, the Energy and Conservation Production Act, as amended, states that all grant awards made under this program shall comply with applicable law, including regulations contained in 10 CFR Part 440.

POLICY

The Grantee is required to use the 200 percent of federal poverty income guidelines to determine eligibility for the Department of Energy Weatherization Assistance Program.

Income refers to total cash receipts/gross income before taxes from all sources, with the exceptions noted below.

Automatic Income Eligibility

A household is automatically income eligible if any household member received any of the following payments at any time during the 12-month period preceding the determination of eligibility for weatherization assistance:

- Cash assistance payments under Title IV (FIP) or, XVI of the Social Security Act (SSI)

NOTE: The receipt of these benefits in the previous twelve months must be documented in the case file. The State's quarterly SSI payments do not need to be documented, but must be included in the calculation.

Income Guidelines

Refer to CSPM Item 208, Poverty Income Guidelines, for the current federal poverty income guidelines.

Income includes:

1. Gross money, wages/earnings and salaries before any deductions. This includes wages from assistantships, work-study, and stipends. This includes self-employment income. See Self-Employment Income section below.

2. Net receipts from non-farm or farm self-employment (receipts from a person's own business or from an owned or rented farm after deductions for business or farm expenses)

3. Self-Employment Income for each type of self-employment activity or business (see Income Computations: Self-Employment Income and Self-Employment Expenses).

4. Regular payments from Social Security (gross benefits, including **any** Medicare premium and/or state supplemental payments), railroad retirement, unemployment compensation, strike benefits from union funds, worker's compensation, veteran's payments, public assistance (including Family Independence Program-FIP (Cash Assistance Title IV), Supplemental Security Income-SSI)training stipends, alimony, and military family allotments

   Note: Retroactive lump sum payments for Social Security or Railroad Retirement Benefits should be prorated on a 12-month basis so that only benefits covering the three-month calculation period are included.

5. Private pensions, government employee pensions (including military retirement pay), and regular insurance or annuity payments

6. Income from individual retirement accounts (IRAs) received during the three-month calculation period, whether as monthly or lump-sum withdrawals

   NOTE: Lump-sum IRA withdrawals should be prorated on a 12-month basis, and three months of the prorated amount should be included in the calculation.

7. Dividends, interest, net rental income, net royalties, periodic receipts from estates or trusts, and net gambling or lottery winnings

8. Any lump sum payments received by Native Americans, such as from Casino income or other tribal income

Income excludes:

1. Combat zone pay to the military

2. Capital gains

3. Any assets drawn down as withdrawals from a bank, the sale of property, a house, or a car

4. One time payments from a welfare agency to a family or a person who is in temporary financial difficulty

5. Tax refunds, gifts, loans, lump-sum inheritances, one-time insurance payments, or compensation for injury

6. Non-cash benefits such as the employer paid or union paid portion of health insurance or other employee fringe benefits (including the imputed value of health insurance for domestic partners), food or housing received in lieu of wages/earnings, the value of food and fuel produced and consumed on farms, the imputed value of rent from owner-occupied non-farm or farm housing, and such federal non-cash benefit programs such as Medicare (Medicare premiums are **not** excluded), Medicaid, food stamps (including cash received in lieu of food stamps), school lunches, and housing assistance

7. College scholarships and grants

8. Foster care payments, child support and adoption subsidies

9. Income earned by a child age 18 and under **and** attending school

   NOTE: "Earnings" do not include program benefits such as Social Security, Supplemental Security Income, etc.; these **are** included in the total household income.

Income Computations

An applicant's household's **ACTUAL INCOME** for the preceding three-month period including the date of application is computed in FACSPro (See CSPM Item 905). For example, an application dated June 7 would have a three-month period of March 8 – June 7. Income must be entered into FACSPro using the Annual option and entering the last three months of income.

Re-Certification of Application

An applicant must be re-certified when eligibility lapses due to the length of time the applicant was waiting to receive Weatherization services. Re-certification must occur at least every 12 months if work on a unit (energy audit) has not been initiated.

Applicants/households that have "roomers" paying rent:
The "roomer" is not considered a member of the "household" and the income of the "roomer" is not counted for income eligibility. However, the rent from the roomer should be included as income. When calculating income, the income from rent payments should be included for the months the rent was received.

Self-Employment Income

Self-employment income must be documented for each type of self-employment activity or business. Business expenses may be deducted from the gross income amount determined for each self-employment activity/business. Documentation of claimed expenses must be included in the client file information.

NOTE: Losses from a single self-employment source of income cannot be applied to any other self-employment income or other household income types. In other words, if self-employment business A realizes a loss of $10,000, the income from that source is considered zero. The $10,000 loss cannot be deducted from self-employment business B or other household income.

Self-Employment Expenses

Allowable expenses include all of the following:

- Identifiable expenses of labor, stock, raw material, seed, fertilizer, etc.
- Interest and principal on loans for equipment, real estate or income-producing property
- Insurance premiums on loans for equipment, real estate and other income-producing property.
- Taxes paid on income-producing property.
- Transportation costs while on the job (example: fuel)
- Purchase of capital equipment.
- A child care provider's cost of meals for children. Do **not** allow costs for the provider's own children.
- Any other identifiable expense of producing self-employment income except those listed below.

The following are **not** allowable expenses:

- A net loss from a previous period.
- A net loss from another type of self-employment.
- Federal, state and local income taxes.
- Personal entertainment or other individual business expenses.
- Money set aside for retirement.
- Depreciation on equipment, real estate or other capital investments.

Documentation of Income

Income must be thoroughly documented and uploaded to FACSPro (See CSPM 612 – Applicant File Documentation). The following items are acceptable documentation:

- Copies of paychecks or pay stubs
- Written statements from employers
- Letters, benefit statements, or other documents from income sources, e.g., DHHS, Social Security, VA
- Unemployment Benefit determination letter or online benefits information
- If self-employed, accounting and other business records, and/or other documenation showing net income after business expenses.
- W-2 statements and tax forms

  Note: W-2 statements and tax forms will seldom be adequate by themselves, since they usually report a period ending well in advance of the date of application. An exception may be made for the self-employed, since tax records are a convenient source of information about their income. They should be used, however, in conjunction with a self-declaration.
- Other documents the Grantee has reason to believe will **fully verify** the annual or annualized income of the applicant

After all other avenues of documenting income eligibility are exhausted, self-declaration is allowable, but evidence of the various attempts at proving eligibility must be contained in the client file, **including** a notarized statement signed by the potential applicant indicating that no other proof of income is available.

If the self-declaration is for zero income **for the entire household**, then along with the declaration being notarized, approval by DHHS BCAEO staff is also required, and a copy of the approval must be in the client file. Requests for approval must be submitted by email to the Grantee's grant manager. The requests should include the applicant's name, date of birth, the last four digits of the applicant's SSN and an explanation of how the household is paying for their living costs.

REFERENCES

- DOE Weatherization Assistance Program (WAP) Program Agreement

PURPOSE

The DOE Agreement, Section II, requires the submission of a monthly programmatic report, via FACSPro and the DHS-1071 as indicated below.

Further, the Agreement requires the Grantee be monitored and all related client records and files be made available for review.

POLICY

The Grantee is required to have all Weatherization jobs for the reporting month entered by the fourteenth day of the reporting month into the FACSPro database. Example: All jobs reported complete for the month of June must be entered into FACSPro by close of business July 14.

NOTE: If you are entering any completed jobs in the first 14 days of the month following the report month, you must change the final closeout date in FACSPro to the correct job completion date. (FACSPro automatically defaults to the day of the data entry.)

BCAEO will extract the monthly report for each agency from FACSPro the fifteenth day of the following month. Agencies can also generate their own 1071 reports from FACSPro for each month for their own documentation. Agencies should be verifying each month that the report is correct in the database.

The Grantee must enter each Inspection field sheet, audit, cost for each job through the Weatherization Module of the FACSPro system.

Weatherization Assistance Program Monthly Programmatic Report

<u>Summary</u>

The data for each DOE-funded unit is gathered from the job cost tab of the jobs completed. The cost center will give one count per unit. For 2-4 unit buildings, complete an individual IWC for each and these completions will be reported in FACSPro.

EXCEPTION: For multi units (5+ and more units per building) with shared heating systems, or shelters, use the Excel formatted 1071 to report these job completions.

This summary data is for DOE-funded completed units. A DOE-funded completed unit is defined as any income-eligible unit that includes weatherization-related expenditures in Admin, Labor/Materials, Support, Liability Insurance, Audit, or Training and Technical Assistance.

Weatherized Units/Re-weatherized Units

Weatherized and re-weatherized units will be counted on the cost center page and tallied automatically from information entered into the database upon intake.

Enter the report period data for each program component. The program components are:

- DOE- units completed with DOE funds only.

- DOE/LIHEAP- Units completed with a combination of DOE/LIHEAP funds.

NOTE: A dwelling unit shall not be considered as completed until all of the following have occurred and are documented:

- A FACSPRO generated IWC has been created
- Audit performed and entered into FACSPRO
- An SIR driven work order has been created using WA 8/FACSPRO
- A Quality Control Checklist has been created and signed by the Energy Auditor.
- All weatherization materials have been installed in compliance with the Standard Work Specifications, SOM policy, rules and regulations.
- The Crew Leader has signed the Quality Control Checklist showing all measures were installed and are in compliance. .
- The Grantee has verified that all required/appropriate forms and documentation are included in the client/job file and is uploaded into FACSPro.
- The Grantee, or its authorized representative, has performed and approved final inspection as a certified Quality Control Inspector.
- The certified Quality Control Inspector completes the Quality Control checklist and verifies all measures have been completed and are in compliance. The Cost Center is completed with costs in appropriate funding

In cases in which weatherization work was started but cannot be completed for a justified reason, signed and dated documentation shall be provided in the client job file as to why the weatherization work was stopped and the unit may be considered a completion. Examples of reasons to stop weatherization work:

- Death of client.
- Dwelling is vacated and/or sold.

- Unable to contact client after numerous (documented) attempts.
- Extensive fire damage.
- Client refuses to allow completion of work after numerous documented attempts.
- Client refuses further weatherization work.
- Client refuses Health & Safety measures.
- Health and safety risks to contractor/crew (e.g. unsanitary conditions, drugs, threats, etc.).

Note: Such circumstances must be documented in the case file and in the action plan and customer notes portion within the FACSPro database.

Production Reporting

The Grantee is required to submit the mdb files for all jobs completed through the program year. These files must be submitted by the 14th day of the month following the end of each quarter.

BCAEO Technical monitors may determine that quarterly files following the first quarter be submitted using wdz files as appropriate. Instruction will be provided to each Grantee.

SUBMITTAL PROCESS

The mdb and/or wdz files must be submitted to BCAEO to the following mailbox:

MDHHS-Weatherization@michigan.gov

REFERENCES

- 10 CFR Part 440, Department of Energy Weatherization Assistance for Low Income Persons Program Regulations
- 10 CFR Part 600, Financial Assistance Rules for Department of Energy
- State of Michigan DOE State Plan
- Department of Energy Weatherization Program Notice 13-5
- DOE Program Agreement
- State of Michigan Technical Weatherization Policy Manual (TWP)
- Standard Work Specifications (SWS)

PURPOSE

Grantees are required to use the approved Energy Audit tools and procedures as approved by the DOE on each unit weatherized. A complete audit and inspection is required for each home weatherized.

POLICY

Only the SOM Certified Weatherization Assistance Program Energy Auditor who conducted the site visit shall enter data onto the “Inspection” document generated in FACSPro and into the initial NEAT/MHEA audit. Audits must include completion of all applicable data of the Inspection document Inspection approval of each installed measure is mandatory for a dwelling to be considered a completion.

Approved audits include:

Single Family: Single Family National Energy Audit Tool software approved by DOE expected 9/2016.

Manufactured Housing: Manufactured Home Energy Audit software approved by DOE expected 9/2016.

National Energy Audit Tool (NEAT)

NEAT audits are required for the determination of weatherization measures to be installed for one to four unit dwellings.

Weatherization measures with a computed Savings to Investment Ratio (SIR) of 1 or greater as calculated by a NEAT audit shall be addressed.

NEAT may indicate that a measure shall be addressed, but conditions dictate otherwise. In these cases,

- If the entry is a price, escalate the measure value to $9999.00 in “additional costs.”
- If the entry is an option of what to consider, choose “none” in the respective measure screen.

Enter a justification in the “comment” section and document the conditions or circumstances on the appropriate page of the approved field audit when the measure cannot be completed. See CSPM 606 for guidance related to client refusal of measures.
This is not applicable for furnace replacement.

NATIONAL ENERGY AUDIT TOOL (NEAT) SETUP:

Grantees shall create and maintain an annual master file. Identify the file with the agency acronym and the program year as the title.

Grantees shall enter their material and labor costs for the allowable NEAT measures.

Note: Material and Labor costs shall be separated into the Material and Labor columns respectively.

Grantees shall enter approved work plan fuel cost data in the “Fuel Cost” tab of the NEAT “Set up Library”. Average costs will be established from recognized suppliers and “spike” or season high costs will not be permitted.

Grantees may, at their discretion, utilize individual client fuel use data collected from the fuel supplier and entered into the “Utility Bills” tab of the “NEAT audit”.

The Fuel Escalation Rates and Discount Rate used in the NEAT setup shall not be altered. Grantees shall use the default values supplied in the NEAT program files.

The NEAT setup shall allow for the consideration of the following Candidate Measures/Weatherization Measures:

- Attic insulation (R-11, 19, 30, 38, and 49 values)
- Fill Ceiling Cavity
- Sill box insulation
- White Roof Coating
- Foundation Wall Insulation
- Floor insulation (R-11, 19, 30, and 38)

- Wall insulation
- Knee wall insulation
- Window sealing/Weatherize (includes glass replacement)
- Storm windows
- Window Replacement
- Low E windows
- Furnace tune-up
- Replace heating system (80%-85%)
- High efficiency furnace (90+ %)
- High eff boiler
- Lighting retrofits (Compact Fluorescent Light Bulbs)
- Refrigerator replacement
- Water Heater replacement (DHW)

Grantees shall turn off the following Candidate Measures in the NEAT setup:

- *Duct Insulation
- Window shading (awning)
- Sun screen fabric
- Sun Screen louvered
- Window film
- Thermal vent damper
- Electric vent damper
- IID (Intermittent Ignition Devices)
- Electric vent damper IID
- Flame retention burner
- Tune-up AC
- Replace AC
- Evaporative cooler
- Install/Replace heat pump
- *Smart thermostat*
- *Faucet aerator*
- *Water heater wrap (insulating blanket)*
- *Water heater pipe insulation (on first six feet of hot water pipe exiting water heater)*
- *Low flow showerheads*
- *Limited weather-stripping and caulking to increase comfort (does not include major air sealing work, which should be guided by blower door testing)
- *Furnace filters*

*Ducts outside of the conditioned space must be evaluated.

*Optional Weatherization Measure - Optional measures turned on by a Grantee shall not exceed $250.00 in total. Grantees must identify at the beginning of the program year if they will be utilizing optional measures and how they will determine when those measures are necessary.

Atmospheric Natural Draft Furnaces

In the event that a mechanical contractor is unable to perform proper diagnostic testing, the energy auditor can use the unit tag information, and utilize the following method to determine SSE for replacement:
Take the input/output data from the tag of the furnace and reduce by 5% if in fair condition and 10% if in poor but working condition. Grantees must provide detail of how they determined condition. Energy Auditors will need to manually make this deduction in WA8. In the instance this is used, the agency must document why a mechanical contractor was not able to perform the testing as required by the Weatherization program.

Draft Induced and Condensing Furnaces

The SSE can only be ascertained by the Output divided by the Input (tag data). The only alternative is to have a Mechanical Contractor ascertain the SSE by testing the furnace. (May not reduce the SSE by 5% for fair condition and 10% for poor condition on draft induced and condensing furnaces).

Weather Data

Weather data is determined by the agency when setting up the library. The Grantee shall chooses the weather center that is closest to the service area.

Key Parameters

The default values contained in the Key Parameters of the “SET UP LIBRARY” shall be utilized with the following exceptions:

- Economics: Minimum Acceptable SIR – 1
- “SETUP Library” “NEAT Insulation Types” tab: Attic - Type 3 F/G Batts Rs/Inch 3.33
- “SETUP Library” “NEAT Insulation Types” tab: Wall - Type 2 F/G Batts Rs/Inch 3.33
- “SETUP Library” “NEAT Insulation Types” tab: Foundation Wall - Type 2 F/G Batts -Value 13

- Any other exceptions shall require written approval from SOM Technical Division

Justification for modification of winter fuel costs and/or weather data must be submitted to the SOM WAP Division for approval as part of the Grantee work plan or prior to implementation if submitted separately from the work plan.

Manufactured Home Energy Audits (MHEA)

The completion of a MHEA audit shall require a thorough audit. Field documentation shall be on a SOM approved field audit and provide all information required to complete MHEA data screens. Any attachments containing audit-related additional information shall be referenced on the SOM approved field audit and included as part of the client file.

Data entries required to complete individual MHEA audits shall be completed in compliance with the NEAT/MHEA Manual instructions.

MHEA SETUP

Set up instructions are located at the following web site:
http://www.waptac.org/sp.asp?mc=techaids_audits

Grantees shall create and maintain an annual master file using the template provided by BCAEO. Identify the file with the agency acronym and the program year as the title.

Grantees shall enter their material and labor costs for the allowable MHEA measures.

Note: Material and Labor costs shall be separated into the Material and Labor columns respectively

Grantees shall enter approved work plan fuel cost data in the “Fuel Cost” tab of the MHEA (NEAT) “Set up Library”. Average costs will be established from recognized suppliers and “spike” or season high costs will not be permitted.

Grantees may at their discretion utilize individual client fuel use data collected from the fuel supplier and entered into the “Utility Bills” tab of the “MHEA AUDIT.

The Fuel Escalation Rates and Discount Rate used in the MHEA setup shall not be altered. Grantees shall use the default values supplied in the NEAT/MHEA program files.

The MHEA setup shall allow for the consideration of the following Candidate Measures/Weatherization Measures:

- General air sealing
- Wall fiberglass batt insulation (if open cavity)

- Wall fiberglass batt insulation in Addition
- Wall cellulose loose insulation in Addition
- Wall fiberglass loose insulation
- Wall fiberglass loose insulation in Addition
- Floor Cellulose loose insulation in Addition
- Floor fiberglass loose insulation
- Floor fiberglass loose insulation in Addition
- Roof cellulose loose insulation in Addition

- Roof fiberglass loose insulation
- Roof fiberglass loose insulation in Addition
- Replace Marked doors
- Replace wooden doors in Addition
- Storm doors (replacement of single “combo” prime door allowable)
- Storm door in Addition (replacement of single “combo” prime door allowable)
- Window sealing/Weatherize (includes glass replacement)
- Window sealing/Weatherize in Addition (includes glass replacement)
- Replace single paned windows
- Replace single paned windows in Addition
- Plastic storm windows
- Plastic storm windows in Addition
- Glass storm windows
- Glass storm windows in Addition
- Tune heating system
- Replace heating system
- Lighting Retrofit
- Refrigerator replacement
- Water heater replacement

Grantees shall turn off the following Candidate Measures in the MHEA setup (they are not allowable weatherization measures):

- Wall cellulose loose insulation
- Floor cellulose loose insulation
- Roof cellulose loose insulation
- Add skirting
- Add skirting on Addition
- White coat roof
- White coat roof on Addition
- Replace wooden doors
- Seal Ducts
- Add awning
- Add awning in Addition
- Add shade screens
- Add shade screens in Addition
- Setback thermostat
- Evaporative cooling
- Replace dx cooling equip
- Tune-up AC
- *Smart thermostat*
- *Faucet aerator*
- *Water heater wrap (insulating blanket)*
- *Water heater pipe insulation (on first six feet of hot water pipe exiting water heater)*
- *Low flow showerheads*
- *Limited weather-stripping and caulking to increase comfort (does not include major air sealing work, which should be guided by blower door testing)
- *Furnace filters*

*Duct Insulation must be evaluated when ducts are outside of the conditioned space.

*Optional Weatherization Measure - Optional measures turned on by a Grantee cannot exceed $250.00 in total. Grantees must identify at the beginning of the program year if they will be utilizing optional measures and how they will determine when those measures are necessary.

Door Replacements

Door Replacement: The MHEA TAB Shell>Doors>Replacement Door Required (check box)>Do not Include in SIR (do not check box)

Weather Data

Weather data is determined by the agency when setting up the library. The Grantee shall chooses the weather center that is closest to the service area.

Key Parameters

The default values contained in the Key Parameters shall be utilized with the following exceptions:

- Economics: Minimum Acceptable SIR: 1
- Insulation: bag size for loose fiberglass insulation, as available to agency

When MHEA indicates that a measure should be addressed but conditions/circumstances dictate otherwise, the measure shall be escalated to a value of $9999.00 in “additional costs” or by inserting a “zero” or in some cases “none” in the respective measure screen. A justification shall be entered in the “comment” section and document the conditions or circumstances on the appropriate page of the approved field audit when the measure cannot be completed.
This is not applicable for furnace replacements.

Atmospheric Natural Draft Furnaces

In the event that a mechanical contractor is unable to perform proper diagnostic testing, the energy auditor can use the unit tag information, and utilize the following method to determine SSE for replacement:
Take the input/output data from the tag of the furnace and reduce by 5% if in fair condition and 10% if in poor but working condition. Grantees must provide detail of how they determined condition. Energy Auditors must manually make this change in WA8. In the instance this is used, the agency must document why a mechanical contractor was not able to perform the testing as required by the Weatherization program.

Draft Induced and Condensing Furnaces

The SSE can only be ascertained by the Output divided by the Input (tag data). The only alternative is to have a Mechanical Contractor ascertain the SSE by testing the

furnace. (May not reduce the SSE by 5% for fair condition and 10% for poor condition on draft induced and condensing furnaces).

Multi-Family Weatherization Audit

An independent energy audit shall be conducted on any multifamily building housing 5 or more units. The independent audit shall have written pre approval by SOM Technical staff and the audit must be DOE approved. BCAEO will adopt the DOE MulTEA family audit once it is available.

Written approval is required prior to the commencement of weatherization services on multi-family units.

Buy Down Audit Procedure

Reference DOE Weatherization Program Notice (WPN) 10-17 for Federal Requirements and CSPM item 622.

- Enter the buy down amount as a negative number in the additional cost cell of WA 8.9/NEAT/MHEA (e.g. -1000) for DBA/FACSPro SIR generated work order.
- For Heating unit replacements (that are not Health and Safety) in WA 8.9/NEAT/MHEA (there is no additional cost cell) combine the labor and material, enter the amount in the Labor Cost cell, and enter the buy down amount as a negative number in the Material Cost cell.
- For measures that have only one cost, enter the cost with the buy down already deducted (e.g. original cost = $700, buy down = -$550, NEAT/MHEA tabs: Ducts/Infiltration>Costs>Infiltration Reduction ($) 150)
- In **all** cases include an explanation and amount in the Comment field of the WA 8.9/NEAT/MHEA measure.
- When reconciling the Cost Center in WxPro Module, enter the funding source for the buy down amount as per policy.

REFERENCES

- 10 CFR Part 440, Weatherization Assistance Program for Low-Income Person
- Department of Energy (DOE) Weatherization Program Notice 15-4 (WPN15-4)

PURPOSE

The Weatherization Assistance Program (WAP) State Plan provides for monitoring of the Weatherization program by the BCAEO weatherization technical monitors and Grantee monitors. Monitoring of dwelling units is conducted by the Grantees during the final inspection process and during jobs in progress; monitoring by the BCAEO technical monitors will occur at least annually.

POLICY

To provide adequate oversight, it is the Grantee's responsibility to train and provide information to the subcontractors on the Weatherization Assistance Program policies to ensure that subcontractors perform in accordance with weatherization standards and comply with all rules and regulations.

To provide oversight, the Grantee is required to have, at a minimum:

- Procedures to ensure that agreements are entered into only with competent subcontractors.
- All staff and contractors are completing weatherization work in compliance with the Standard Work Specifications, Michigan Field Guide, Community Services Policy Manual, and Michigan Technical Weatherization Policy. All contracts must have this language included.
- A system for monitoring subcontractors and dwelling units.
- A system to provide technical assistance to subcontractors as needed.
- Documentation in FACSPro of all monitoring and technical assistance provided, all trainings and certifications, to include at a minimum, who was trained on what subject on what date they were trained and certified if applicable.
- A system to track grantee and BCAEO monitoring findings and observations by auditor/inspector, contractor, and/or worker to ensure that repeated program deficiencies observed are addressed appropriately and swiftly.

A system to track training and certifications for those performing work on units for the Weatherization Assistance Program. All Weatherization training for staff and contractors must be entered into FACSPro.

State of Michigan WAP Technical Monitoring

Technical monitoring will be performed to ensure compliance with all DOE WAP, HHS regulations and guidance, and DHHS policies. Technical monitoring will include, but is not limited to a review of the following areas:

- Any outstanding findings, previous year's findings, and required corrective actions
- Program requirements for all funding sources including Health & Safety compliance.
- Materials standards and specifications
- NEAT/MHEA setup libraries (copies of each shall be provided by Grantee)
- NEAT/MHEA mdb production shall be provided by Grantee (wdz files may be submitted subsequently on a quarterly basis)
- Contractor Licensing, Certifications, and Insurance requirements
- Work specifications (e.g. FACSPRO generated Work Order(s) including change orders)
- Quality Control Checklist completion
- Quality control procedures
- Approved audit (IWC) completeness and storage using FACSPRO
- Financial reconciliation for all job cost and invoicing reported in the FACSPro WxPro module.
- Compliance with blower door testing requirements
- Infrared camera requirements
- Combustion Appliance testing protocol
- Correct audit selection & completion
- An in progress site visit with the Contractor/crew (working)
- Trend analysis of best practices, observations, questioned costs or findings

File selection and site visit monitoring and review will be chosen using the FACSPro Wx Pro Monitoring module. BCAEO Technical Weatherization monitors will monitor 10% of agency file documentation and complete 5% site visits for each agency.

In Progress Technical Monitoring

Technical Weatherization staff will monitor in progress and completed jobs for each

agency and/or one in progress and completed site visit per contractor/crew.

Annual Monitoring

Technical Weatherization staff will conduct annual monitoring beginning July of each calendar year. The annual monitoring will review contractor rosters, the process for awarding jobs, insurance for contractors, compliance submitting quarterly mdb files, weatherization worker certifications, and training, compliance with documentation in FACSPro and audit library set up.

POLICY

The Grantee may not make discretionary allocations on a subcontractor invoice. All private subcontractor invoices are required to contain a job number and labor/material costs (split or combined) for each job.

The Grantee is required to use the invoice and the IWC work order pages to verify actual work completed prior to payment to the subcontractor.

Quality Control Checklists must be signed and dated by the Energy Auditor, Crew Leader and Quality Control Inspector.

If the Grantee has contractors use an internal invoicing/billing document, the contractor must sign the invoice showing that the invoice is correct for each item.

REFERENCES

10 CFR Part 440, Weatherization Assistance Program for Low-Income Persons

PURPOSE

10 CFR Part 440.18(e)(2)(ii) states that a dwelling unit that has been previously weatherized under the Weatherization Assistance Program may receive additional weatherization services

> if such dwelling unit has been damaged by fire, flood, or act of God and repair of the damage to weatherization materials is not paid for by insurance.

10 CFR Part 440.18(e)(2)(iii) states that:

> dwelling units partially weatherized under this part or under other Federal programs during the period of September 30, 1975 through September 30, **1994**, may receive further financial assistance for weatherization under this part. While DOE will continue to require these homes to be reported separately, States may count these homes as completions for the purposes of compliance with the per home expenditure limit in §440.18. Each dwelling unit must receive a new energy audit which takes into account any previous energy conservation improvements to the dwelling.

POLICY

A maximum of 50 percent of a Grantee's total production each program year may represent reweatherized units that meet the criteria above.

Each dwelling to be weatherized is required to receive a new energy audit that takes into account any previous energy conservation improvements to the dwelling.

Reweatherized units will be reported separately on the Weatherization Assistance Program Monthly Programmatic Report, DHS-1071. See Item 602 for form and instructions for completion.

Reweatherized units will be reported as completions for purposes of compliance with the maximum allowable cost per unit as established in the Community Services Policy Manual Item 613.

REFERENCES

- 10 CFR Part 440, Department of Energy Weatherization Assistance for Low Income Persons Program Regulations
- 10 CFR Part 600, Financial Assistance Rules for Department of Energy
- State of Michigan DOE State Plan
- Weatherization Program Notice 13-5
- Weatherization Program Notice 16-1
- State of Michigan Technical Weatherization Policy Manual (TWP)
- Standard Work Specifications (SWS)
- Retrofitting Michigan: Technical Weatherization Field Guide

PURPOSE

DOE requires that certain Weatherization Assistance Program requirements are met.

POLICY

Grantees are required to administer this grant following the U.S. Department of Energy (DOE) Weatherization Assistance Program (WAP) regulations and guidance. The CSPM will prevail when the manual has policy that contains requirements different from WAP regulations.

The Grantee will determine which weatherization measures will be completed on an eligible dwelling unit in accordance with the SWS and the TWP-Inspection/Testing/Energy Audit Requirements.

General Program Requirements

The Grantee shall weatherize eligible dwelling units in its service area as detailed in the Grantee's DOE Weatherization Assistance Program Local Service Plan, as approved by DHHS.

The Grantee will maintain a basic service system which includes an outreach/intake system, a method of installing measures, audit and inspection procedures, qualified crews and/or subcontractors, and maintenance of quality control procedures to ensure each dwelling weatherized is completed in compliance with all program requirements.

All weatherization work must have and independent Quality Control Inspector (QCI). The QCI is an individual that has no involvement with prior work on the home either as the auditor or as a member of the crew.

Eligible Dwelling Units

Structures eligible for weatherization include single-family, manufactured housing (mobile homes), and both large (5+ units) and small multi-family housing (2-4 units). All structures must be stationary and have a specific mailing (street) address. Campers and non-stationary trailers are not eligible.

All dwellings to be weatherized must be owner or renter occupied, and occupied by a household:

1. Whose income is at or below 200 percent of the poverty level established by the U.S. Department of Health and Human Services, or

2. Which contains a member who has received any one of the following at any time during the 12-month period preceding the date of application for weatherization assistance:

   - Cash assistance payments under Title IV (FIP) or, XVI of the Social Security Act, (SSI)

3. Occupying a qualified rental dwelling unit in accordance with CSPM Item 608.

4. Occupying a shelter, group home or transitional facility in accordance with CSPM Item 608.1.

Allowable Measures

All weatherization materials utilized in conjunction with work performed as a part of this program shall, at minimum, meet the NREL Standard Work Specifications and the Standards for Weatherization Materials contained in "Appendix A" as published in the current U.S. Department of Energy Weatherization Assistance Program (DOE/WAP) rules (See Section 4500, Minimum Standards for WAP Materials). In cases where additional requirements apply, the specific requirement(s) will be listed in the appropriate section of this document.

All measures shall be completed so as to successfully perform the intended function on a continuing basis (a quality of product and installation to provide a minimum 10-year life under normal conditions or WA8 lifespan generated SIR).

Work shall be completed in a manner so as not to detract from the general appearance and structural integrity of the home and shall be in compliance with governing codes, the requirements of this document, and manufacturer's recommendations.

Weatherization measures are for the purpose of rendering the heated portions of dwellings energy efficient and to ensure the safety and protection of such measures,

whether new or existing (e.g., any wood or other product which the manufacturer recommends be sealed, that is used to complete weatherization and which is exposed to moisture, shall receive a minimum of prime painting or other recommended sealer). For the purpose of this program, if necessary client usage of areas requires heat to those areas, they shall be treated as heated and weatherized accordingly. Unheated utility rooms, porches, etc., are not eligible for weatherization.

Health and safety measures shall be addressed as required to eliminate hazards as defined in the Technical Weatherization Policy Manual, the Retrofitting Michigan Weatherization Field Guide, and in accordance with the State of Michigan, U. S. Department of Energy Weatherization Assistance Program State Plan, and state and local codes.

If energy savings cannot be realized under this program due to the condition of a home, these conditions shall be documented in the electronic file (i.e. FACSPRO deferred queue or ineligible queue (whichever is applicable)) and the home shall not be weatherized. Such conditions shall be brought to the attention of the client with referrals to other help sources if available.

“Incidental Repairs” means those repairs necessary for the effective performance or preservation of weatherization materials.

Measures installation shall be completed in the following sequence:

1. Health and Safety measures to correct hazards identified on the audit that directly affect the health and safety of occupants (WAP staff and workers included).
2. Bypass/Air sealing
3. Insulation measures.
4. Remaining audit measures

MANDATORY WEATHERIZATION MEASURES

The following measures are required:

- Bypasses, as determined by blower door testing
- Duct Sealing, Repair and/or Replacement
- Blower Compartment Sealing
- Duct and Pipe Insulation (if located in unheated areas)

MANDATORY HEALTH AND SAFETY MEASURES

- Smoke Detectors - Smoke detectors shall be provided. Installation of smoke detectors shall be placed in accordance with all SOM and Local Fire/Building Codes.
- Carbon Monoxide (CO) Alarm/Detector – CO Alarm/Detectors shall be provided in accordance with ASHRAE 62.2 – 2013 or later standard.
- Clothes Dryer Venting – Un-vented clothes dryers shall be vented to the exterior.
- Ventilation to meet ASHRAE 62.2 requirements 2013 or later.

OPTIONAL WEATHERIZATION MEASURES

Grantees may install General Heat Waste reduction measures, known as Optional Weatherization Measures, on one to four unit dwellings, without a need for justification in a site specific energy audit. Optional Weatherization Measures are intended to be relatively low cost items that can be quickly and easily installed. Measure costs, including labor, must not exceed $250.00. These measures must provide additional benefit to the client/customer and are not able to be tied to another measure. Allowable Optional Weatherization Measures include:

- Low Flow Shower Head
- Water Heater Insulation
- Clock Set Back Thermostat
- Heating System Tune-ups/Repairs
- Limited weather stripping and caulking to increase support (does not include major air sealing work, which should be guided by blower door testing); and
- Furnace filters

Grantees shall establish a local policy as to whether the installation of optional weatherization measures will be addressed and clearly define the perimeters of when such measures can be installed.

EXCLUSION OF MEASURES/NO WEATHERIZATION WORK POSSIBLE

If any of the audit required measures are not possible to perform, file documentation shall be required to clarify such situations. A brief explanation shall be noted on the SOM approved field audit and the appropriate section under “Comments” on the NEAT audit if used.

Note health and safety factors which cannot be corrected, e.g., removal of mold, odors, viruses, bacteria, unsanitary (including raw sewage) conditions, and rotting wood. If necessary, weatherization services may need to be deferred until the problem can be corrected or referred to another agency that can take remedial action. The Health and Safety condition shall be properly documented in the client file.

Factors which would limit the effectiveness of any measure shall be properly documented. Client circumstances (e.g., health) shall also be considered.

Client Declines a Measure listed on Audit

If a client declines the installation of a measure, appropriate client education techniques should be utilized in an attempt to eliminate the client's concern. If after the explanation and discussion with the building owner or occupant, they still decline the measure and the auditor deems the reason for declining the measure as legitimate, the auditor should complete all other weatherization measures and include in the client file a comprehensive explanation of the rationale for skipping the specific measure.

If the auditor deems this is not a legitimate reason for declining the measure, the situation must be fully documented in the client file. The work would be completed with installation of only measures having a SIR higher than the declined measure. The client must be informed (documented) that the home cannot receive further work after the completion.

Client objects to certain material prior to work beginning

If the client objects to a measure prior to work beginning, alternate materials should be researched as appropriate to ensure the safety of the proposed measure. Client education should be the first procedure. If that fails it may be possible to re-run the audit with a different but acceptable material to determine if the substitute material is cost effective. If no cost effective option for the material can be identified, the job must be deferred due to client refusal unless the measure has the lowest SIR.

Client refuses high priority measure after job has begun

After a job has begun, and due to scheduling, measures are installed with a low priority and during the process of installation, the client declines a higher priority measure, the job would be complete at the time of the client declining the higher priority measure. Only measures having a SIR higher than the declined measure may be installed unless a lower priority measure has already been installed. This should be clearly explained in

the client file documentation and in the WxPro notes in FACSPro. The Grantee is required to have the client sign a document stating they are aware of and accept all WAP rules, including specific services and measures determined by the energy audit.

Rental vs. Owner Unit Type

There are no restrictions to the measures installed to any unit based on it being a rental or owner unit. All allowable measures determined via the DOE approved audit are appropriately installed in any eligible unit regardless of the type. See CSPM Item 610.2, Landlord Contributions for policy related to landlord contributions.

If a rental unit is attached to a commercial business (ex. an apartment above a store), the Grantee will submit audit information to the technical monitor for review and approval prior to completing weatherization work.

REFERENCES

- 10 CFR Part 440, Department of Energy (DOE) Weatherization Assistance for Low Income Persons Program Regulations
- 10 CFR Part 600, Financial Assistance Rules for Department of Energy
- State of Michigan DOE State Plan
- DOE Program Agreement
- State of Michigan Technical Weatherization Policy Manual (TWP)
- Standard Work Specifications (SWS)
- Building Performance Institute, ANSI BSR BPI-1200
- Retrofitting Michigan: Technical Weatherization Field Guide

PURPOSE

The purpose of this policy is to identify and define technical weatherization testing on homes to worker safety and client safety.

POLICY

All units must have the following tests completed to ensure the safety of the home and to ensure proper weatherization of each home weatherized.

Required Testing

Blower Door
The blower door shall be used at the audit and inspection as a diagnostic tool to measure the air tightness of buildings and to help locate air leakage sites.

The infiltration/exfiltration bypass measures will be considered fulfilled when blower door calculations determine the dwelling is at the minimum air change level for occupant safety conditions, as required by ASHRAE 62.2 2013 or newer.

Each home shall be evaluated for minimum sealing levels based on current occupants and dwelling construction. All dwellings weatherized require blower door testing during energy audit and inspection by a BCAEO approved/certified Energy Auditor or an IREC certified Quality Control Inspector. Any final inspections performed after July 1, 2015 require the final inspection to be completed by a certified Home Energy Professional Quality Control Inspector.

Carbon Monoxide (CO)

- All dwellings weatherized shall be tested for CO levels during audits and inspections.
- Tests shall include ambient air checks.
- Levels exceeding 9 parts per million (ppm) shall be documented on the SOM approved audit and corrective action recommended.

Combustion Appliance

- All combustion appliances shall be inspected during energy audit by the BCAEO approved/certified energy auditor and during the Quality Control Inspection by an IREC accredited certified QCI and/or tested by a licensed mechanical contractor. (Reference BPI-1200 standard). Related sections of the SOM approved audit shall be completed. There shall be no disassembly of the mechanical components of combustion appliances, unless completed by a licensed mechanical contractor.
- The Combustion Appliance Zone procedure to check for vent stack spillage shall be followed and documented on the SOM approved audit.

Worst Case Draft of Combustion Appliance Zone

Combustion appliances shall be tested under the worst case depressurization of the Combustion Appliance Zone (CAZ). The Worst Case Depressurization of the CAZ testing, when performed, shall be documented on the SOM approved audit.

Infrared Scans

Infrared scans shall be completed annually for each contractor/crew with priority given to jobs identified by the weatherization monitor and/or auditor or QC Inspector(s) for scanning.

- Calculations shall be completed for each job scanned to determine the percent of void area present.
- Jobs containing void areas in excess of 5 percent will require corrective action.
- Additional scanning of the same contractor/crew shall be completed if repetitive problems are found.

REFERENCES

- U. S. Department of Energy (DOE) Weatherization Program Notice (WPN) 12-9
- U.S Department of Energy (DOE) Weatherization Program Notice (WPN) 13-5
- Technical Weatherization Policy Manual
- Retrofitting Michigan Technical Weatherization Field Guide
- 10 CFR 440.3

PURPOSE

The WAP federal regulations 10 CFR 440.3 defines Incidental Repairs as follows: "Those repairs necessary for the effective performance or preservation of weatherization materials. Such repairs include but are not limited to framing or repairing windows and doors which could not otherwise be caulked or weather-stripped and providing protective materials, such as paint, used to seal materials installed under this program." Grantees are reminded that WAP is not a rehabilitation or general repairs program. Program policies strictly prohibit roof replacements, structural repairs, or other non-energy related rehabilitation work. Units requiring this type of repair should be referred to a rehabilitation program or the Grantee must use other sources of funds to cover these costs.

Incidental repairs must be justified in the client file with an explanation for their need and relationship to a specific energy conservation measure (ECM) or group of ECMs.

POLICY

Incidental repairs must be justified in the client file with an explanation for their need and relationship to a specific energy conservation measure (ECM) or group of ECMs.

Incidental Repair Measure (IRM) includes incidental repair materials and installation, which are performed because they are deemed necessary for the effectiveness of one or more ECMs. The ECM(s) that require the installation of an IRM must be documented in the client file. The IRM costs are not added to an individual or partial group of ECM costs. <u>The total costs of all IRMs is added to the cost of the package of weatherization measures to calculate the whole (SIR).</u>

The primary goal of the WAP is to lower the home energy costs of qualified households without negatively affecting the health and safety of the occupants. Justification for the cost of each IRM and how each IRM is necessary for the effective performance or preservation of an ECM must be documented in the client file. Further, each ECM, including any associated ancillary items and installation costs, must have a calculated

SIR of 1.0 or greater to be eligible for DOE funding. For each weatherized building, the cost of the total package of ECMs, added to the cost of all IRMs for the building, must have a calculated SIR of 1.0 or greater.

After the first audit run, a package of measures may not have a qualifying SIR. It would be necessary to remove the combination of the ECM and its related IRM with the lowest SIR. If the IRM was deemed necessary for effective performance of the ECM, then both the ECM and the IRM must be removed in the attempt to meet the dwelling SIR. This process (removing the lowest ECM and its associated IRM) would continue until the package of measures (and each ECM) has a qualifying SIR.

If one IRM is necessary to protect or enhance more than one ECM, (e.g. roof repair protecting attic insulation, sidewall insulation, and foundation insulation; and the Grantee plan designates roof repair as an incidental repair) then all of those ECMs together must be considered for removal until the SIR for the package of measures is 1.0 or greater. This process may result in deferral of the weatherization work until another funding source can be found to pay for the IRM(s).

IRMs must be limited to those minor repairs necessary for effective performance or preservation of measures installed by the Sub grantee. WAP funds cannot be used to install IRMs deemed necessary to protect materials in the building before the WAP audit is performed.

REFERENCES

- 10 CFR Part 440, Weatherization Assistance Program (WAP) for Low-Income Persons
- Weatherization Program Notice 16-1, 16-5, 16-6
- DOE WAP Memorandum 016 – Multifamily Housing - HUD Lists
- DOE Multifamily Units Frequently Asked Questions
- DOE Rental Units Frequently Asked Questions

PURPOSE

To provide Grantees with guidance on weatherizing rental units and multifamily buildings in the Weatherization Assistance Program (WAP). This guidance covers prioritizing weatherization work based on housing type, multifamily building eligibility, average cost per unit in multifamily dwellings, property listings for use in the WAP, and required documentation.

POLICY:

Prioritizing Weatherization Work Based on Housing Type

The purpose of WAP is to ensure weatherization services are being provided to low-income persons that live in all types of housing (i.e. single family, manufactured housing units, and multifamily buildings). Additionally, 10 CFR 440.1 states WAP shall increase energy efficiency of dwellings owned or occupied by low income persons… especially low income persons who are particularly vulnerable such as the elderly, persons with disabilities, families with children, high residential energy users, and households with high energy burden.

Grantees are reminded that weatherization is designed to take place with a whole *building as a system* approach (10 CFR 440.22(b)). A single unit within a multi- unit building is not categorically excluded, but due to the rare instances when this is allowable, requires BCAEO and DOE Project Officer (PO) prior approval.

Multifamily Building Eligibility

10 CFR Part 440.22(b)(2), states that a Grantee may weatherize a building containing rental dwelling units where not less than 66 percent (50 percent for duplexes and four-unit buildings) of the dwelling units in the building:

(i) Are eligible dwelling units, or

(ii) Will become eligible dwelling units within 180 days under a Federal, State, or local government program for rehabilitating the building or making similar improvements to the building.

The initial expectation is that Grantees will target buildings with five or more units wherein 66 -100 percent of the occupants meet the income eligibility requirements. However, there are certain buildings where 50 percent eligibility is more appropriate threshold. DOE indicated that certain eligible types of large multifamily buildings are those buildings for which and investment of DOE funds would result in significant energy efficiency improvement because of the upgrades to equipment, energy systems, common space, or the building shell. Utilizing the 50% rule requires BCAEO approval and DOE approval.

All units in the building MUST be similarly served and all units separately reported to DOE. All units, whether having income eligible occupants or not, must be weatherized, along with common areas, and tenants (eligible or not, having applied or not) cannot opt out of audit determined energy savings measures.

Vacant Units

If the whole building qualifies for WAP, the vacant units should receive WAP services per the energy audit. The unit may also be counted as eligible if it will become income-eligible within 180 days under a federal, State or local government program for rehabilitating the building or making similar improvements to the building (CFR 440.22(b)(2)(ii)). In the event a vacant unit is counted as an eligible unit but is then occupied by an ineligible family, the project becomes disallowed if the minimum eligibility requirements for the building as a whole, set forth in 10 CFR 440.22, are not met.

Property Listings for Use in the Weatherization Assistance Program

Multi-unit Buildings as identified by the Department of Housing and Urban Development (HUD) and the Department of Agriculture (USDA) **2016** Calendar Year:

DOE has posted three lists of properties supplied by HUD and USDA. Properties identified on these lists have been determined to meet certain eligibility criteria under WAP. The lists will reduce the review and verification necessary to weatherize the identified buildings through WAP.

Grantees are encouraged to periodically check the posting of identified buildings. HUD and USDA continue to identify additional eligible properties that meet the income eligibility criteria under WAP. As those lists become available, DOE posts on the DOE/EERE website at: http://energy.gov/eere/wipo/articles/hud-multifamily-property-listings-eligible-weatherization-assistance

NOTE: WAP may continue to use this information to qualify multifamily buildings through calendar year 2016.

List #1: Properties identified on list #1 have been determined to comply with the requirements that:

- A minimum of 66% of the dwelling units in the building are occupied by a family unit that meets the income requirement (as required under 10 CFR 440.22(b)(2));
- For a reasonable period of time after weatherization work has been completed, the eligible dwelling unit will not be subject to rent increases as a result of the weatherization (as required under 10 CFR 440.22(b)(3)(i)); and
- No undue or excessive enhancement has occurred to the value of the dwelling unit (as required under 10 CFR 440.22(b)(3)(i)).

List #2: Properties identified on list #2 have been determined to comply with the requirements that:

- A minimum of 66% of the dwelling units in the building are occupied by a family unit that meets the income requirement (as required under 10 CFR 440.22(b)(2)); and
- No undue or excessive enhancement has occurred to the value of the dwelling unit (as required under 10 CFR 440.22(b)(3)(i)).

List #3: (USDA List of Multifamily Units) Properties identified on List #3 have been determined to comply with the requirement that:

- A minimum of 66% of the dwelling units in the building are occupied by a family unit that meets the income requirement (as required under 10 CFR 440.22(b)(2))

The buildings identified on the lists must still meet all other applicable eligibility requirements.

Multi-unit Buildings as identified by the Department of Housing and Urban Development (HUD) and the Department of Agriculture (USDA) 2017 Calendar Year:

Beginning in calendar year 2017, HUD will no longer be updating the lists, therefore, WAP will no longer use them. At that point HUD will quality multifamily buildings on a case-by-case basis, as requested. Grantees wishing to qualify a building should make the request through their BCAEO Grant Manager to begin the process of qualifying a building through DOE and HUD.

Note that a public housing, assisted housing, US Department of Agriculture (USDA), or Low-Income Housing Tax Credit (LIHTC) building that does not appear on the list(s) may still qualify for WAP. Income eligibly can be made on an individual basis by local WAP service provider that implements the Program based on information supplied by property owners and the families.

The rule expressly indicates that income qualified public housing, assisted housing, and LHTC properties may be eligible recipients of WAP funds. The rule does **not**, however, **require** the State of Michigan or Grantees to set aside funds for these properties. If a Grantee has interest in pursuing utilizing WAP funds for these type of Weatherization projects, contact the BCAEO Grant Manager to determine a process.

Documentation Requirements

Table 1: Documentation Requirements

Documentation Required	If on HUD or USDA List	If NOT on HUD or USDA List
Building Owner Permission	Yes	
Income Eligibility Documentation	No (see Note)	Yes
Demographics of Residents	Yes	Yes
Accrual of Benefits to Tenants (see Note)	Yes, if applicable	Yes, If applicable
Audit Runs	Yes	Yes
Leverage/Buy-Down Agreements	Yes, if applicable	Yes, if applicable

Note: Agency documents from the HUD or USDA lists was used and the eligibility threshold of the list (e.g. 66% or 100%)
Note: If tenants are not billed directly for energy costs, Grantee documents how benefits accrue to residents.

Building Owner Permission
As required in 10.CFR 440.22(b)(1), the Grantee is required to obtain the written permission of the owner of the building or his agent.

Income Eligibility
Except when using HUD/USDA lists, as referenced above, the Grantee must collect income information on a unit-by-unit basis to ensure at least 66% (or 50% for identified housing) of the occupants in five or more unit building are eligible for service.

For units in a building(s) included in one of the three 2016 Calendar Year DOE posted listings of eligible properties, individual household applications are not required. In lieu of this application, completion of the Michigan Department of Health and Human Services BCAEO Multi-Family Property Intake Form, DHS-4283-M, is required. A client file is not required for these units. A building file must be retained

Demographics
Grantees must have procedures in place to ensure that priority is given to identify and provide weatherization assistance to: elderly persons, persons with disabilities, families with children, high residential users, and household with high energy burden. Grantees must obtain, verify, and maintain, as required the proper documentation on demographics for the properties to be weatherized.

Grantees must collect the defined demographics reported to BCAEO and to DOE.

When a building is on one of the HUD/USDA posted lists, the Grantee must state in the project file which list the building is on and the eligible percentage (66% or 100%) of units corresponding to that list. Generally, resident demographics must be reported on a unit-by-unit basis. However, for those buildings on the HUD/USDA lists, rent rolls or other such building owner records provided on an entire building or project basis are sufficient documentation to meet this requirement. Grantees are urged to initiate a landlord/tenant agreement to capture elements required by the regulations (e.g., benefits accrue to the tenants, tenants are not subjected to rent increases due to property improvements provided by WAP, what occurs if tenants are evicted or the building sold before a specific period of time has passed). This agreement should correspond to the type of subsidy the building receives.

Benefit Accrual to the Tenant

Instances in which a tenant does not pay for energy directly, Grantees must ensure the weatherization benefits accrue to the low-income tenant.

Any request for weatherization of eligible multi-unit buildings needs to demonstrate in sufficient detail to the Grantee that the benefits of weatherization work accrue primarily to the low-income tenants.

To ensure this, Grantees have the option of:

- Requiring a landlord agreement for a minimum period of five years, or
- Developing an agency policy describing a combination of several categories of benefits that can be used to demonstrate that the benefits of the weatherization accrue primarily to the tenant.
- Benefits that could be combined, include, but are not limited to:
    - Longer term preservation of the property as affordable housing;
    - Continuation of protection against rent increases beyond that required under the WAP regulations (10 CFR 440.22(b)(3)(ii);
    - Investment of the energy savings in facilities or services that offer measurable direct benefits to tenants;
    - Investment of the energy savings from the weatherization work in specific health and safety improvements with measureable benefits to tenants;
    - Improvements to ventilation and to heat and hot water distribution to improve the comfort of residents; and
    - Establishment of a shared savings program

Generic assertions such as “tenant services will be improved” or “weatherization will improve health and safety” are **not** sufficient to demonstrate that the accrual of benefits requirement is met.

LWOs wishing to use their own policy must submit the draft policy to the Bureau for approval prior to implementation. Draft policy review requests should be emailed to: MDHHS-BCAEO@michigan.gov with a copy to the DHHS-BCAEO grant manager.

The table below is an "at-a-glance" to convey which potential benefits are valid for different utility payment arrangements.

Table 2: Accrual of Benefits

Potential Benefit	Tenant Pays Utilities	Utilities included in Rent
Lower energy bills when seasonal temperatures are consistent with historic temperatures	Yes	No
"Lower than expected" energy bills in the event of hotter/colder weather than previous years	Yes	No
Longer term preservation of the property as affordable housing	Yes	Yes
Continuation of protection against rent increases beyond that required under the WAP regulations (10 CFR 440.22(b)(3)(ii))	Yes	Yes
Investment of the energy savings in facilities or services that offer measureable direct benefits to tenants	Maybe- requires description	Yes
Investment of the energy savings from the weatherization work in specific health and safety improvements with measureable benefits to tenants	Maybe- requires description	Yes
Additional improvements, not related to weatherization, to heat and hot water distribution, and ventilation, to improve the comfort of residents	Yes	Yes
Establishment of shared savings program	Maybe- requires description	Yes

Audit Runs

The WAP file for each building should contain at least the following information from the energy audit:

- The recommended statement of work including the savings to investment ratios (SIRs) of each measures and the total project SIR.

- If any measures were brought down or otherwise leveraged the documentation must show the pre-leveraged SIRs of each individual measure and the pre-leveraged project SIR.
- Documentation must include the other sources that funded each brought-down measure.

- Either a printed file showing all of the building audit inputs and outputs or the immediately accessible electronic file that shows all audit inputs and outputs.
- Final installed costs of each measure and the total project costs. If the project went through the bidding process then all bid prices- winning and losing bids- must be in the file.
- All specifications defining each measure.

Leverage/Buy-Down Agreements

Grantees are strongly encouraged to be innovative in attracting other resources into the WAP. The ultimate goal is to increase the number of low income households that can be served and/or permit additional cost-effective measures to be installed in each dwelling unit.

Many WAP Programs use a combination of ***federal funds*** (e.g., WAP funds, Low-Income Home Energy Assistance Program (LIHEAP) funds, and Community Development Block Grant Program (CDBG)) and ***non-federal funds*** (e.g., utility investments from systems benefit charges or efficiency programs, state funds from special set-asides, other rehabilitation funds, private funds from landlord contributions or foundations, and other private sources) to accomplish the scope of work on a building.

Regardless of the funding source, only measures on a list of measures with a cumulative SIR of 1 or greater may be paid for in any portion with WAP funds.

In addition, landlords may contribute to the weatherization of their buildings. There are two mechanisms for landlord contributions: participation agreements that address broad Grantee requirements and specific measure buy-downs. Grantees may establish and require participation agreements. They may allow buy-downs. Funding sources other than landlord contributions may also be used for buy-downs.

At Grantee discretion, building owners may also buy down measures *they* typically prioritize as needs – like furnace or boiler replacements or new fenestration – that do save energy but don't achieve an SIR of 1 or greater as a stand-alone measure. This must be approved by BCAEO.

Note: All associated health & safety costs incurred on a dwelling unit are generally treated outside the SIR when determining cost-effectiveness. However, all energy related incidental repair measures associated with weatherizing the dwelling units are a part of the SIR when determining costs.

Grantees have some flexibility in calculating the SIR for a specific measure when other funds can be used to offset some of the costs, thereby reducing the WAP investment on the remaining investment. It is not DOE's intent, however, to participate in projects that do not demonstrate overall cost effectiveness in design and installation.

All Grantees will use this SIR calculation allowance only when the cost effectiveness for the entire investment in the property can still be substantiated. In other words, a measure can be bought down only when the overall SIR of the package of measures, including the full cost of the measure that would be bought down is 1.0 or greater.

Example: In order for a measure to qualify for the buy-down, the package of measures, including the full cost (the pre-buy-down cost) of the measure which is to be bought down, must have an SIR ≥ 1.0.

For example, in the first case below the replacement windows would be eligible for a buy-down in WAP; the replacement windows with a full-cost measure SIR = 0.8 could be bought down so the after-buy-down DOE *measure* cost would have an SIR of at least 1.0 (and of course the post-buy-down DOE package SIR would increase).

In the second case the replacement windows would not be eligible for a buy-down in WAP because the pre-buy-down *package* SIR is below 1.0.

Energy Saving Economics Case 1 – Buy-down Allowed in WAP		
Measure	**Measure SIR**	**Cumulative SIR**
Infiltration Reduction	1.3	1.3
Lighting Retrofits	7.4	1.7
Ceiling Insulation	2.4	1.9
Replacement Windows (pre-buy-down)	0.8	1.1 **(≥ 1.0)**

Energy Saving Economics Case 2 – Buy-down Not Allowed in WAP		
Measure	**Measure SIR**	**Cumulative SIR**
Infiltration Reduction	1.3	1.3
Lighting Retrofits	7.4	1.7
Ceiling Insulation	2.4	1.9
Replacement Windows (pre-buy-down)	0.6	0.9 **(not ≥ 1.0)**

Further, it is not DOE's intent to "leapfrog" measures that are already cost-effective in order to accommodate a measure that is included in the package of measures as a result of using the provisions of this guidance. All measures that were cost-effective after the initial energy audit is conducted would remain a part of the list of measures to be completed on the building. Measures that did not attain the SIR of 1.0 can only

be considered for buy down if all the cost-effective measures in the initial audit are also installed.

The following steps are recommended in order to determine what other funding is necessary to leverage for a measure that would otherwise not meet WAP SIR requirements:

1. It is expected that Grantees will use this SIR calculation allowance of the building to determine the package of measures that a combined SIR of 1.0 or greater, including measures that are not cost-effective without leveraged resources.
2. Determine whether sufficient funds from other resources are available to bring any measures with individual SIRs below 1.0 in that package up to at least an SIR of 1.0.
3. Apply those other funds to that measure and include it in the package of measures.
4. Document the inclusion of the leveraged measure into the weatherization statement of work with the original energy audit <u>and</u> either
    a. A summary of all costs associated with the weatherization of the building, including any or all resources to be used, or
    b. A revised audit in which the leveraged price of the additional measure is used as the measure cost. This documentation will be part of the building's customer file along with the inputs and results of both energy audits.

For Frequently Asked Questions regarding DOE's position on issues and questions related to Multiunit Weatherization and Rental Unit Weatherization visit the following websites:

DOE Multifamily Weatherization Frequently Asked Questions:
http://www.waptac.org/data/files/Website_docs/Government/Guidance/2016/WPN-Multifamily-FAQs-050516.pdf

DOE Rental Units Frequently Asked Questions:
http://www.waptac.org/data/files/Website_docs/Government/Guidance/2016/WPN-Rental-Units-FAQs-050516.pdf

REFERENCES

10 CFR Part 440, Department of Energy Weatherization Assistance Program (WAP) for Low Income Persons

Department of Energy Weatherization Program Notice (WPN) 10-15A

PURPOSE

10 CFR Part 440.22(b)(2), states that a subgrantee may weatherize a shelter, group homes, and transitional facilities.

10 CFR Part 440.22(b)(3), states that a subgrantee may weatherize a building containing rental dwelling units….where:

(i) The benefits of weatherization assistance in connection with such rental units where the tenants pay for their energy through their rent, will accrue primarily to the low-income tenants residing in such units;

DOE WPN 10-15A provides guidance regarding accrual of benefits to low-income tenants in multi-unit buildings under WAP.

DEFINITIONS

A *shelter* is a dwelling unit or units whose principal purpose is to house on a temporary basis individuals who may or may not be related to one another and who are not living in nursing homes, prisons, or similar institutional care facilities.

A *group home* is a single unit in which three or more people, not related by blood or marriage, reside and share eating facilities. In addition, a group home must have a clearly definable identity which distinguishes it from more informal, family-type settings. A group home may be either a temporary or a permanent residence.

POLICY

The Grantee may weatherize a shelter, group home or similar facility for long- or short-term residents, provided the owner or organization <u>and</u> residents of the dwelling units meet prescribed building and income eligibility requirements. Prior, written approval by the DHS BCAEO staff is required for the weatherization of any shelter, group home or

transitional facility. The documentation materials included below should be submitted to the DHS-BCAEO email for review and approval. Include in the subject line: "*Shelter, Group Home, Transitional Living facility application approval request"*

DOCUMENTATION

Grantees will document individual resident income verification unless there is such a high rate of turnover among residents that documentation of individual resident eligibility is impractical.

When documentation of individual resident income eligibility is impractical, operators of eligible facilities must complete the *Weatherization Assistance Program Application for Shelters, Group Homes and Transitional Facilities, DHS-4284,* with the following supporting documentation:

1. A signed statement from the facility operator attesting that the individuals/households residing in the facility are income eligible.
2. A copy of the organization's income guidelines or a copy of the organization's mission statement in lieu of individual resident income verification.
3. Documentation that the facility is a non-profit organization.
4. Proof of benefit accrual to the low-income tenant(s).

Unit Count

For the purpose of determining how many dwelling units exist in a shelter, the grantee may count one of the following as a dwelling unit:

a. Each 800 square feet
b. Each floor

Benefit Accrual to the Tenant

In instances in which a tenant does not pay for energy directly, the grantee must ensure the weatherization benefits accrue to the low-income tenant. To ensure this, the grantee has the option of:

- Requiring a landlord agreement for a minimum period of five years, or

- Developing an agency policy describing a combination of several categories of benefits that can be used to demonstrate that the benefits of the weatherization accrue primarily to the tenant.

  Benefits that could be combined, include, but are not limited to:

  - Longer term preservation of the property as affordable housing;
  - Continuation of protection against rent increases beyond that required under the WAP regulations (10 CFR 440.22(b)(3)(ii);
  - Investment of the energy savings in facilities or services that offer measurable direct benefits to tenants;
  - Investment of the energy savings from the weatherization work in specific health and safety improvements with measureable benefits to tenants;
  - Improvements to ventilation and to eat and hot water distribution to improve the comfort of residents; and
  - Establishment of a shared savings program.

Generic assertions such as “tenant services will be improved” or “weatherization will improve health and safety” are **not** sufficient to demonstrate that the accrual of benefits requirement is met.

Grantees wishing to use their own policy(ies) must submit the draft policy to BCAEO for approval prior to implementation. Draft policy review requests should be emailed to: DHS-BCAEO@michigan.gov with a copy to the grant manager.

File Documentation

Job files must include all applicable client file information required in Items 601 and 612, as well as the following documentation:

1. Verification of individual resident’s income eligibility (if applicable)
2. A copy of the DHS-4284, Weatherization Assistance Program Application for Shelters, Group Homes and Transitional Facilities, with the following supporting documentation:
   a. A signed statement from the facility operator attesting that individuals/households residing in the facility are income eligible.
   b. A copy of the organization’s income guidelines or a copy of the organization’s mission statement in lieu of individual resident income verification.

c. Written statement providing proof of benefit accrual to the low-income tenant(s).
d. A copy of the written approval by the DHS BCAEO staff for the weatherization of any shelter, group home or transitional facility.

REFERENCES

DOE Weatherization Program Notice 16-1 Application Instructions

PURPOSE

The purpose of this policy is to provide written policy identifying reasons to defer a unit scheduled to be weatherized.

POLICY

The Grantee is required to have a written deferral policy which is in the best interest for its service area. Examples of reasons to defer a unit scheduled to be weatherized include:

- Standing water, mold, friable asbestos, deteriorated lead-based paint surfaces or other hazardous materials that cannot be addressed by the weatherization work.
- Evidence of infestations of rodents, insects, and/or other vermin.
- Unvented space heater(s) that may have a harmful effect on the air quality of the home.
- Unsecured pets that may prevent workers from safely completing their work.
- The presence of sewage or animal feces in or around the home.
- Improperly stored chemicals, combustible materials, or other fire hazards that present a danger to the occupants or the workers.
- Maintenance or housekeeping practices that limit the access of workers to the dwelling or create an unhealthy work environment.
- Major remodeling is in progress, which limits the proper completion of weatherization measures.
- The home receives HUD funding and at the time of completion, the unit will not meet applicable HUD Lead-Based Paint standards.

- Electrical or plumbing hazards or structural failures that cannot be addressed/completed within Incidental Repair or Health and Safety (H&S) cost limitations.

- Threat(s) of violence or abusive behavior to worker(s) or household member(s) during the weatherization process.

- The illegal presence or use of any controlled substance in the home during the weatherization process. This includes marijuana.

- Occupant has known health conditions that prohibit and/or limit the installation of insulation or other weatherization materials.

- The building or dwelling unit is for sale or in foreclosure.

- Ownership cannot be confirmed due to a legal dispute. Clear title must be established before services can be provided.

- The building or dwelling unit is scheduled for demolition/redevelopment.

Note: When the auditor/inspector or any other weatherization employee encounters an unsafe or inoperable heating appliance during the heating season, weatherization work should not proceed until the condition is corrected.

Although Michigan has acknowledged marijuana as a legal substance, federal law does not recognize marijuana as legal. Therefore, federal law will prevail as the program is federal funded.

Grantees are required to have a written deferral policy that outlines the procedures to be followed when making a deferral decision and notifying the customer. It should include guidelines for establishing a time period for correction and an identification of resources and options to assist the applicant.

When service is deferred, the owner or occupant should be given a reasonable timeframe to correct/eliminate the problem. Examples of reasonable timeframes would be 30 days for housekeeping concerns or 90 days for major remodeling work.

Deferral Notification Requirements

Upon the decision to defer weatherization program services, the customer must be notified in writing within five working days.

The notice must include the reason for the deferral, and the means by which the applicant can rectify the situation so the weatherization measures can be performed. The requirements for rectifying the deferral must be reasonable and appropriate to the severity of the situation being addressed. Any eligible applicant that complies fully with these requirements shall be reinstated in the Grantee's work system so weatherization work can progress as soon as reasonably possible.

There is no time extension for the eligibility period due to a deferral. If the dwelling cannot be reported as complete within the eligibility period, the customer must reapply for weatherization assistance. On a deferred unit, photographs documenting the reason for deferral (mold or other problems) are required and shall be part of the client file. If photographs are unobtainable, the reason(s) must be documented in the client file.

REFERENCES

- 10 CFR Part 440, Weatherization Assistance Program for Low-Income Persons
- Department of Energy Weatherization Program Notice 16-6
- Department of Energy Weatherization Program Notice 16-6 Frequently Asked Questions
- Final Rule, Federal Register, January 27, 1984

PURPOSE

To provide Grantees with guidance on weatherizing single family and multifamily rental units in the Weatherization Assistance Program (WAP). Grantees may weatherize a building containing rental dwelling units where the Grantee has obtained written permission of the owner or his agent.

POLICY

The Grantee has established procedures for dwellings which consist of a rental unit or rental units to ensure that:

- The benefits of WAP work accrue primarily to the low-income tenants.
- The rent will not be raised within 24 months after weatherization work has been completed unless it is clearly shown that any rent increase is not related to the weatherization work in any way.
- The Grantee has procedures in place to enforce the time period limits before there can be a rent increase.
- The weatherization work will not increase the value of the rental units to an undue or excessive amount.

The Grantee will ensure a landlord agreement is completed for each building containing a rental dwelling unit to be weatherized, prior to the weatherization of any rental unit. A Tenant Synopsis must be signed by the tenant receiving weatherization services.

Landlord agreements generally include all necessary information to allow the weatherization improvements to proceed in an expeditious and cost effective manor in accordance with DOE regulations and guidelines, as well as State of Michigan and local contract law. In addition to addressing basic guidelines, the landlord agreement typically includes:

1. The approval of signatures of the building owner(s) or legal representatives.
2. A description of the owner's obligations including any financial contributions;
3. A description of the Grantee's obligations including the scope of work and;
4. Rental clauses that allow rent increases only for specific causes or set limits on increases such as pro-rated share of increased property taxes, increased operating expense, or the pro-rated amortized cost of property improving outside the scope of WAP;

5. Protection against sale of property clause; and
6. A definition of a breach in the agreement and the remedies to be taken if such a breach occurs, including liquidated damages.

Any Grantee customized document must contain the information on the sample agreement provided. See Attachment A for a sample Landlord Agreement.

DOE has comprised a document regarding Weatherization of Rental Units Frequently Asked Questions. The document can be viewed at: http://www.waptac.org/data/files/Website_docs/Government/Guidance/2016/WPN-Rental-Units-FAQs-050516.pdf

LOCAL WEATHERIZATION OPERATOR NAME
STREET ADDRESS
CITY, STATE, ZIP
TELEPHONE

WEATHERIZATION ASSISTANCE PROGRAM (WAP)
LANDLORD AGREEMENT

This Agreement applies to buildings containing rental dwelling units, located in the State of Michigan. This Agreement is made and entered into by and between

(The Local Weatherization Operator)

(The Owner)

(Premises to be Weatherized)

WHEREAS, the Department of Human Services is a state agency responsible for administering weatherization programs in Michigan in accordance with federal and state laws, and rules and regulations governing the programs; and

WHEREAS, the Department of Human Services has contracted with The Local Weatherization Operator to use said funds to make weatherization materials and weatherization labor available for benefit of eligible households; and

WHEREAS, many eligible households reside in rental housing in buildings containing rental dwelling units which may be weatherized if not less than 66 percent (50 percent for two and four-unit buildings) of the dwelling units in the premises are eligible dwelling units; and

WHEREAS, the eligible households residing in the dwelling units and buildings receiving weatherization assistance are the intended third party beneficiaries of this Agreement;

NOW THEREFORE, in consideration of the foregoing premises, the parties agree as follows:

1. The Local Weatherization Operator agrees to provide certain weatherization program improvements to the premises of The Owner and occupied by the eligible household(s). Such improvements may include any or all of the measures identified from the energy audit.

2. In consideration for the weatherization improvements, The Owner does covenant and agree that the monthly rental fee of the premises, as shown on Exhibit A, shall not be increased for a period of twenty-four months beginning with the weatherization completion date. (Completion date is defined as the date of the final post-inspection.)

   Exceptions:

   - Rental increase can be fully justified due to significant increases in actual operating costs.
   - Where rental fees are restricted under IRS Section 42, HUD, USDA Rural Development, or MSHDA program rules, rental fees may be increased to the extent allowed by such programs and shall be deemed to be unrelated to weatherization work.

3. The Owner agrees to maintain the weatherization materials installed under this Agreement, in accordance with all relevant codes regarding maintenance.

4. The Owner agrees not to evict, terminate, or institute any court action for possession against any eligible dwelling unit tenant for the 12 months following the weatherization completion date, except for:

   - failure to pay rent;
   - violating the terms of the lease (other than to surrender possession upon proper notice);
   - causing substantial damage to the premises
   - permitting a nuisance;
   - carrying on unlawful business.

5. The Owner agrees that the terms, premises, and obligations of this Agreement shall supersede and be superior to any inconsistent provision of any oral or written lease agreement affecting the rent collected for the eligible dwelling units identified in Exhibit A.

6. The Owner agrees and consents to permit The Local Weatherization Operator and its employees to enter upon the premises for the purpose of making the weatherization improvements. The Local Weatherization Operator is granted the right to inspect the premises and to examine any heating fuel and utility charges and costs with respect to the premises. Representatives of the U.S. Department of Energy and the State are also granted the right to inspect the premises weatherized by The Local Weatherization Operator.

7. The Owner hereby swears or affirms that the building(s) is not presently being offered for sale and further agrees to give the Local Weatherization Operator thirty days notification of the sale or conversion of the building. At least ten days prior to the sale or conversion the Owner agrees to obtain, in writing, the purchaser's consent to assume the Owner's obligations under this Agreement or, if this consent is not obtained, to pay the Local Weatherization Operator the full cost of weatherization pro-rated by the number of months left under this Agreement.

8. The Owner agrees to provide the Local Weatherization Operator fuel consumption data for this building(s). The data will consist of the total electrical and home heating fuel consumption data for the 12 months prior to the weatherization application date and the 12 months immediately following the completion of the final post inspection. This data shall be supplied to the Local Weatherization Operator as soon as practicable after it is received by the Owner. In situations where the tenant is responsible for paying the electric and/or fuel bill, the Local Weatherization Operator should request this information from the tenant or utility company.

9. The Owner agrees that if the Local Weatherization Operator determines this unit(s) is eligible for refrigerator replacement(s), the replacement(s) will be done in accordance with WAP program standards located in the Technical Weatherization Policy Manual. The refrigerator being replaced must be surrendered without exception.

10. Ownership of the replacement refrigerator falls to whomever owns the refrigerator that is being replaced, either the owner/occupant, property owner, or eligible household, as documented below and on the Tenant's Synopsis. All refrigerators owned by the landlord that are replaced must remain in the rental unit occupied by the weatherization applicant.

    Owner of existing refrigerator in this rental unit: Property Owner/Landlord ____

    Eligible Household ____

11. In the event that The Owner increases the rent charged to an eligible household occupying an eligible dwelling unit, the occupant(s) of the eligible dwelling unit as third-party beneficiaries of the

Agreement can assert any direct claims against The Owner in any action or special proceeding in any court of appropriate jurisdiction.

12. In the event that The Owner initiates any eviction, termination, and/or possession action on an eligible household occupying an eligible dwelling unit, the occupants of the eligible dwelling unit as third party beneficiaries of the Agreement can assert any direct claims against The Owner in any action or special proceeding in any court of appropriate jurisdiction.

13. That for breach of this Agreement, damages, where not otherwise specified, may be awarded in accordance with applicable law.

14. The Local Weatherization Operator shall not be held responsible or liable in any way for the failure to provide work, labor, service, or materials provided for by the terms of this Agreement by reason of federal, state, or local requirements or regulations prohibiting the provision of such work, labor, service, or materials.

15. The Local Weatherization Operator shall provide a synopsis of the terms of this Agreement to the households occupying each eligible dwelling unit within 30 days of the date of the weatherization completion date of this Agreement. Further, The Local Weatherization Operator shall provide, or cause the owner to provide, a synopsis of the terms of this Agreement to subsequent households occupying each eligible dwelling unit and to the new and subsequent occupants of eligible dwelling units vacant as of the weatherization completion date of this Agreement.

16. The Local Weatherization Operator shall provide any occupant of an eligible dwelling unit access to this document in accordance with federal and state laws.

17. Exhibits A, B, and C shall be signed by both parties and become a part of this Agreement upon signing by both parties. In the event an exhibit cannot be completed at signing, provisions related to those exhibits shall not be considered binding until such times as they are completed, signed by both parties, and attached to this Agreement.

18. The provisions of this Agreement are severable. If any provision of this Agreement is found invalid, such finding shall not affect the validity of this Agreement as a whole or any part or provision hereof other that the provision so found to be invalid.

_____ _____

Signature of Owner or Authorized Representative Date

_____

Owner's Address

_____ _____

Signature of Local Weatherization Operator Representative Date

The Local Weatherization Operator will not discriminate against any individual or group because of race, sex, religion, age, national origin, color, height, weight, marital status, disability, or political beliefs.

LOCAL WEATHERIZATION OPERATOR NAME

STATE OF MICHIGAN
WEATHERIZATION ASSISTANCE PROGRAM
LANDLORD AGREEMENT

EXHIBIT A

ELIGIBLE DWELLING UNITS AND RENT

The documented eligible dwelling units, including those listed on Exhibit B, which are to be weatherized or caused to be weatherized by this agreement, and each unit's rent as of the date of weatherization completion are as follows:

Address	**Unit Number**	**Monthly Rent**

Signature of Owner or Authorized Representative Date

Signature of Local Weatherization Operator Representative Date

LOCAL WEATHERIZATION OPERATOR NAME

STATE OF MICHIGAN
WEATHERIZATION ASSISTANCE PROGRAM
LANDLORD AGREEMENT

EXHIBIT B

DESIGNATED VACANT ELIGIBLE DWELLING UNITS

The designated vacant eligible dwelling units which are to be rented to or occupied by an eligible household within 180 days in cases of a federal, state, or local government program for rehabilitating or making similar improvements to the dwelling unit(s).

Address	**Unit Number**

Signature of Owner or Authorized Representative Date

Signature of Local Weatherization Operator Representative Date

LOCAL WEATHERIZATION OPERATOR NAME

STATE OF MICHIGAN
WEATHERIZATION ASSISTANCE PROGRAM
LANDLORD AGREEMENT

EXHIBIT C

WORKSCOPE

The State of Michigan (SOM) approved audit or priority list shall be utilized to determine the appropriate measures for all single family and appropriate multi-family (four units or less) homes weatherized.

Measures that may be considered include the following:

Health and Safety Measures
Air Sealing/Duct Sealing/Repair/Replacement
Duct Insulation
Major Bypasses and Infiltration/Exfiltration
Attic Insulation
Knee wall insulation
Wall insulation
Compact Fluorescent Light Bulbs
Band joist (“Sillbox”) Insulation
Floor insulation
Perimeter insulation
Refrigerator replacement
Domestic Hot Water Tank (DHW) Replacement
Mechanical systems may be evaluated

Note: This listing is advisory and not exhaustive.

Multi-family homes with five or more units will be evaluated for appropriate measures by a DOE-approved audit subject to the approval by the Department of Human Services.

_____

Signature of Owner or Authorized Representative Date

_____

Signature of Local Weatherization Operator Representative Date

LOCAL WEATHERIZATION OPERATOR NAME

STREET ADDRESS
CITY, STATE, ZIP
TELEPHONE NUMBER

STATE OF MICHIGAN
WEATHERIZATION ASSISTANCE PROGRAM
LANDLORD AGREEMENT

TENANT'S SYNOPSIS OF THE PROVISIONS CONTAINED IN THE WEATHERIZATION LANDLORD AGREEMENT

The Department of Human Services Weatherization Assistance Program provides funds to weatherize homes on income eligible households.

Your landlord has entered into an agreement with _____, a grantee of the Department of Human Services, to have your building weatherized on your behalf. In return for this weatherization, your landlord has agreed to several provisions that benefit you and give you specific rights. You are called a third party beneficiary of the Agreement. These provisions and rights are summarized for you below:

1. The landlord cannot raise your rent for twenty-four months from the date of the final inspection of the weatherization work activities, except in cases where the landlord can clearly show actual increases in property taxes, maintenance, and operating expenses, or other costs not directly related to the weatherization work. (Completion is defined as the date of the final post inspection.) However, if you live in a rent controlled or rent stabilized unit, the landlord may receive approval for normal rent increases.

2. If you happen to move out of your unit within the twenty four month period, the landlord must charge the new tenant the same rent you are being charged.

3. If the owner or landlord sells your building within the twenty four month period, the new owner must also comply with all provisions of the Agreement.

4. The landlord agreed not to institute any eviction, termination, or possession action against you for one year, unless you fail to fulfill your normal tenant responsibilities.

4. If your landlord tries to raise your rent within the twenty-four month period, you have the right to assert a claim against the landlord in court. If this happens and you need assistance in asserting your claim, call your local legal services office.

6. If the LWO has determined that your unit is eligible for a refrigerator replacement, the landlord agrees the replacement will be in accordance with program standards located in the Technical Weatherization Policy Manual. The refrigerator being replaced must be surrendered without exception.

   Ownership of the replacement refrigerator falls to whoever owns the refrigerator that is replaced, either the owner/occupant, property owner/landlord, or renter, as documented below and on the

Landlord Agreement. All refrigerators owned by the landlord that are replaced must remain in the rental unit occupied by the weatherization applicant.

Owner of existing refrigerator in this rental unit:

Owner/Occupant _____ Property Owner/Landlord _____ Renter _____

7. You have the right to see the Agreement signed by your landlord and the Local Weatherization Operator named above who weatherized your unit. You may use the Agreement document as evidence in court to prove your claim. To obtain a copy or see the agreement, you may contact the Local Weatherization Operator by telephone or write to the address as identified on this document.

This agreement shall be in effect for two years from the completion of the weatherization activities on the unit(s). (Completion is defined as the date of the final post-inspection.)

I verify that I have received a copy of this document.

_____

(Tenant's Signature) (Date)

REFERENCES

- 10 CFR Part 440, Weatherization Assistance Program for Low-Income Persons
- Weatherization Assistance Program Agreement
- Weatherization of Rental Units Frequently Asked Question on WAPTAC

PURPOSE:

To establish guidelines for landlord contributions in the Weatherization Assistance Program.

10 CFR 440.22(d) states that as a condition of having assistance provided under this part with respect to multifamily buildings, a State may require financial participation, when feasible, from the owners of such buildings. Such financial participation shall not be reported as program income, nor will it be treated as if it were appropriated funds. The funds contributed by the landlord shall be expended in accordance with the agreement between the landlord and the weatherization agency.

A discussion in the preamble to the Final Rule amending the DOE WAP regulations dated March 4, 1993, (58 FR 12514), indicates the new (at that time) allowance for this Grantee requirement only applies to multifamily landlords, not single family. DOE does support Grantee and local agency efforts to *require* landlord participation in multifamily buildings, when feasible. However, the March 4, 1993 Final Rule does not allow Grantees to require contributions for single family rentals. In fact, the preamble indicates that “DOE feels that placing a requirement on this group [single family rentals] of dwelling units may have an adverse effect on their participation in the program”. *Id.* at 12523

POLICY:

If the Grantee elects to require landlord contributions for multi-family units, the Grantee must have a written landlord contribution policy. The policy may include a cash contribution, rent reduction to the tenant, consideration of documented improvements made to the property within the last twelve months, or a combination of all three. The Grantee’s governing board is required to approve the landlord contribution policy if the Grantee is a Community Action Agency. A Grantee cannot require a landlord contribution for DOE single family rental homes but a Grantee can encourage landlords that are able to contribute, to do so as part of the weatherization work being completed.

The Grantee’s Landlord Agreement must incorporate language identifying the contribution option(s); the option(s) chosen by the Landlord; specifically how the

contribution will be used; any established landlord contribution unit cap; waiver criteria and if the contribution is waived, why it is waived.

The Grantee is required to maintain documentation that supports the disposition of landlord contributions as agreed upon between the Grantee and the landlord.

The U.S. Department of Energy considers landlord contributions leveraged funds and as such, they are to be used to expand energy efficiency services and/or increase the number of dwelling units weatherized. Therefore, DHHS encourages Grantees to apply cash contributions to labor and/or material costs.

Landlord cash contributions received should be applied to reduce the costs in the program year they are received. Report landlord cash contributions on the Statement of Expenditures, Section IV, Other Income, for the month in which they are received. Report cash contribution expenditures on the Statement of Expenditures, Section III, for the month they are spent.

Landlord contributions are **NOT** included in the average cost per unit.

REFERENCES

- Department of Energy, 10 CFR Part 440
- Weatherization Program Notice 16-1
- Michigan Public Service Commission, Michigan Energy Appraisal 2014-2015

PURPOSE

A Department of Energy study noted that subgrantees that had a client priority system attained their service goals more frequently than those who did not have such a system.

POLICY

The Grantee is required to utilize a priority point system when determining homes to weatherize. Grantees must utilize the statewide point system set up in FACSPro to determine priority points. Each category is 1 point.

Mandatory and allowable priority categories are as follows:

- Elderly Units
- Disabled Units
- Households with children
- High Residential Energy Users –The Michigan Department of Licensing and Regulatory Affairs Public Service Commission, publishes an annual report titled "Michigan Energy Appraisal." High Residential Energy User households are defined as meeting or exceeding the normalized heating fuel consumption identified in the Michigan Energy Appraisal by ten percent or more. Use the chart below to determine whether the household is eligible for this priority.

The Grantee must collect the heating fuel consumption records for the winter heating season: November through March each year. Compare the household consumption to the chart below. If the household consumption meets or exceeds 10% over the normalized use- Column D- the household is eligible for priority points in this category.			
Column A	Column B	Column C	Column D
Heating Fuel Type	Normalized Use for 2014-2015 Heating Season	Measure	10% applied
Natural Gas	73	Mcf	80
Heating Oil	518	Gallons	570
Propane	869	Gallons	956

- Households with a High Energy Burden- defined as follows: any household that pays more than 20% of its total annual household income toward annual energy costs.

REFERENCES

- 10 CFR Part 440, Department of Energy (DOE) Weatherization Assistance for Low Income Persons Program Regulations.
- DOE Agreement

PURPOSE

To ensure appropriate documentation is maintained for applicants of the Weatherization Assistance Program, minimum requirements have been established regarding such documentation.

POLICY

A client file must be maintained on FACSPro for each applicant. Grantees are responsible for maintaining all applicant information and technical weatherization documents for each home weatherized.

Eligibility Documents

The following documents must be uploaded to FACSPro using the document link on the customer intake screen:

- Signed FACSPro Customer Report with Weatherization Disclaimer or Standard Application Form, DHS-4283 with updated weatherization disclaimer, including the Social Security Numbers of all household members.
- Signed FACSPro Weatherization disclaimer. If using DHS-4283, agency must have a disclaimer that matches the FACSPro Weatherization disclaimer for the customer to sign.
- Income eligibility documentation (pay stubs, award letters, etc.)
- Written notification to client
- Priority criteria selection
- Home ownership documentation (including rental units)
- Landlord Agreement (if applicable)
- Documentation of landlord contributions (if applicable)
- Utility usage documentation

- BCAEO approval of self-declaration of zero income for the entire household (if applicable)

- Any other documents the Grantee has reason to believe will fully verify the income of the applicant household.

Client Signature and Technical Weatherization Documents

The following documents must be uploaded to the FACSPro Weatherization Module under the Weatherization Application Documents tab within 30 days of completion of Final Close Out:

- Client Plan of Action
- DHS-4285, Pre-Renovation Form Confirmation of Receipt of Lead Pamphlet (or certificate of mailing) – See Item 615
- Client Refrigerator Declination form, if applicable
- Michigan Weatherization Program Health & Safety Assessment Findings, DHS-552
- Release of Liability and Waiver of Claims, DHS-552-A
- Weatherization Assistance Program Client Inspection/Assessment, DHS-1008
- Any other forms that require client signature (e.g., asbestos notice, unsafe condition, infrared scan, etc.)
- State Historic Preservation Office (SHPO) Documentation – See Item 619
- Completed inspection document
- Completed work order in FACSPro
- Completed Cost Center in FACSPro
- Completed DOE-approved audit
- Manual J file documentation (if applicable)
- Quality Control Checklist completed and signed by the auditor upon audit, the crew leader upon completion of all measures, and the Quality Control Inspector upon Final Inspection
- All technical required testing results
- Infrared Scan Report including calculations/results
- Permits (e.g., mechanical, electrical, building, etc.), when applicable

- Mechanical and/or other trades invoices, when applicable
- Certificate of Insulation, when applicable
- LRRP Documentation when applicable
- All photos that document conditions supported by a TWP-required Notice (e.g., Asbestos or Potentially Unsafe Conditions)I
- If no Lead Safe Work Practices (LSW) required, documentation of why not required

Documentation shall be maintained at the grantee (or office of grantee) which establishes compliance with standards and testing requirements. Types of documentation may include manufacturer's specifications, material containers, and/or test lab reports. In cases where contractors are providing materials, the agency shall maintain documentation on all products being used by each contractor. Product documentation shall be organized in one location and available for monitoring review.

Photographs

An agency may choose to keep job photographs on an agency system. The agency is responsible for supplying the photographs to BCAEO staff upon request and in a timely manner (photograph requests must be met within four working days). The agency will be responsible for the storage of the photographs as outlined in the DOE agreement.

Agencies that do not wish to store their photographs on an agency system must be upload photographs to the FACSPro Weatherization Module under the Weatherization Application Documents tab (compressed to e-mail 96PPI).

Required photographs for each weatherization unit include:

- Front and right side of house (side immediately counterclockwise) with back and remaining side (alternative may be front and left, if required)
- Mobile home long side with entrance and end, immediately counterclockwise with remaining long side and end, immediately counterclockwise
- Basement/foundation

- Furnace, with venting if possible
- Domestic Water Heater (DWH), with venting if possible
- Combustion appliance venting if not able to capture in appliance photo
- Clothes dryer with venting
- Existing refrigerator
- Attic including insulation, knob & tube wiring and exhaust fan ducting, when applicable
- LSW set up, if charged to job
- Photos of exhaust fans and/or controls for ASHRAE compliance, where applicable
- Photographs of all call back work completed
- Photographs of all complaint follow ups
- LRRP Documentation when applicable

REFERENCES

- Technical Weatherization Policy Manual (TWP)
- DOE Agreements
- Department of Energy Weatherization Program Notice 13-5, 16-1

PURPOSE

The purpose of this policy is to identify the required applicant file documentation of the required weatherization unit field audit.

POLICY

The SOM Inspection field audit document is required to be completed for each unit/building completed. The SOM approved field audit must be fully completed.

FACSPro shall be used to generate an inspection field audit document, Work Order, and maintain/update Weatherization job files. All changes shall be noted on WxPro notes (e.g., Job Assigned, Change Order, etc.) and/or either entered into the next appropriate queue or “Overwrite” previous IWC.

Grantees must complete the weatherization of a home within 6 months of conducting the energy audit. Jobs that are not completed within 6 months of the energy audit require an additional, up to date, energy audit to be performed.

Any drawings, spread sheets, NEAT data sheets, or other information utilized in conjunction with completion of the SOM approved audit and the NEAT audit shall be referenced on the appropriate page of the SOM approved audit and included in the client/job file.

An SOM Approved Audit shall be completed for buildings/units weatherized. The SOM approved audit shall be fully completed including all general information, measures, materials, costs, and sign-offs.

<u>Multi Unit Buildings</u>

For multi units (5+ and more units per building) with shared heating systems, or shelters, do not use FACSPro. A multi-unit reporting form is available upon request from your Weatherization Technical Monitor.

The file must include one completed SOM approved field audit for each building. The audit must include all work including weatherization work performed in common areas like hallways, attics, basements, etc.

The client/building files should clearly indicate the structure is a multi-family building and must be cross-referenced with all other units weatherized in the building.

The files shall clearly indicate weatherization measures to be completed. SOM approval shall be obtained to determine if one comprehensive audit or multiple audits are required. All weatherization work performed including common areas shall be documented on the SOM approved audit.

All client files for the building must be clearly cross-referenced so that any reviewer can easily determine building eligibility under the 66 percent (50 percent) rule, or any other aspect of the total weatherization work to that multifamily building. The file(s) must clearly indicate it is a multifamily building.

REFERENCES

10 CFR Part 440 §440.16(a) states:

No dwelling unit may be weatherized without documentation that the dwelling unit is an eligible unit as provided in §440.22.

POLICY

Application

A signed FACSPro Customer Report for the applicant household, including the signed Weatherization Disclaimer, must be uploaded to the FACSPro intake document section. A signed, completed Application for Weatherization Assistance, DHS-4283, may be used in place of the Customer Report when the application is mailed or taken at a remote location. The signature must be completed in ink. Grantees may use their own application form if it includes all the information on the DHS-4283 and has been approved by DHS. The Grantee must maintain a file for each applicant with the original signature Customer Report or DHS-4283. If an application is used, all required FACSPro entries must still be completed so that a Customer Report is available for each applicant household (See CSPM Item 903).

NOTE: The uploaded Customer Report or DHS-4283 must include the Social Security Numbers of each household member.

Follow procedures in CSPM Item 601 to determine and document income eligibility.

The Grantee is required to determine eligibility within 30 calendar days from the date all documents needed for eligibility determination are received. If documents needed to determine eligibility are not received within 90 days of the application date, the application is to be denied and the client notified.

If weatherization activities* do not begin within one calendar year from the date of eligibility determination, a new application is required.

***NOTE:** The date “weatherization activities” start is the date materials are installed.

Applicant Notification

Each applicant for weatherization services must be notified in writing of their eligibility status within 30 calendar days from the date of eligibility determination. The notification must include, at a minimum, the following:

1. Applicant name, address and date

2. The determination decision on program eligibility

3. If the applicant is eligible, an indication of when the work will begin

4. If the applicant is ineligible, the reason(s) for ineligibility, the right to appeal and the Grantee's appeal procedure

A copy of the written notification must be uploaded to FACSPro on the customer intake screen.

REFERENCES

10 CFR Part 440, Weatherization Assistance Program for Low-Income Persons

PURPOSE

Client education and participation will help reduce energy costs in a weatherized dwelling.

The goal of the Weatherization Assistance Program is for the weatherization team (weatherization coordinator, intake staff, auditors, inspectors, and crews/contractors) and the client to work together as partners to save energy, to make the home more comfortable, and reduce energy bills.

The weatherization team must be aware of the importance of energy education for the client. Every effort must be made to increase client awareness through multiple contacts during the weatherization process. Staff and contractors must be aware they are the critical link in the partnership goal. Inclusion of the goal statement on literature, brochures, and forms the client must sign reinforces the partnership goal.

POLICY

Intake

Energy education begins with intake. This is where the applicant is initially introduced to the weatherization assistance program, the goal statement, the partnership concept, and the applicant is advised of his/her role.

The following minimum steps related to intake must be included in the Grantee's Energy Education Plan.

1. Introduce the Weatherization Assistance Program. Explain the concept of the program, what work may be done, and expectations for the applicant's participation.

2. Complete the application in FACSPro or the paper Application for Weatherization Assistance, DHS-4283. Retain the signed WAP application or signed FACSPro client intake report with the Weatherization disclaimer in the client file.

3. Determine eligibility and prioritize the applicant. See Item 611 regarding the client priority system.

4. Notify the applicant of the eligibility determination.

5. Ask the applicant to prepare for the audit by:

a. Making a list of energy questions and concerns
b. Making the attic, basement, and crawl space accessible
c. Making the perimeter accessible
d. Securing pets
e. Planning to be home and ready to participate

Audit

It is important that the client be involved in the audit process. Client involvement is encouraged through commitment in writing to the goal statement and a minimum of *three energy action steps*. These energy action steps are to be placed in the client file and to be included with all documentation given to anyone who goes to the client's home.

The following minimum steps related to the audit process must be included in the Grantee's Energy Education Plan.

1. Explain the Weatherization Assistance Program, stressing what each partner will do during each step.

2. Explain the agenda of the audit and what the client will need to do.

   Explain how the house loses heat. Inquire about the heating system. Talk with the client about whether some rooms seem warmer while others are cooler. Show the client how to adjust heat flow to different areas to save energy and provide more comfort. Point out areas where the client could take action to save energy and money.

3. Complete the audit.

4. Summarize the results of the audit for the client.

   a. Explain the nature of the work that may be done on the home.
   b. If the client is actively participating, agree on three energy action steps for the client to do.
   c. If the client is actively participating, the Client Plan of Action should be signed by the client and auditor. A copy is to be provided to the client and the original must be uploaded to the FACSPro Weatherization Module under the Weatherization Application Documents tab.

Weatherization Work

When the crew or contractor is at the client's home, he/she should take advantage of every opportunity to reinforce the client's Energy Action Plan (E.A.P.). The theme of partnership

and the goal statement need to be a part of the crew or contractor's interaction with the client for continued success.

The following minimum steps must be included in the Grantee's Energy Education Plan.

1. Introduce the contractor or crew to the client.

2. Complete a quick survey of the home, accompanied by the client. Reinforce the energy conservation work already done by the client.

3. Discuss the work plan for the day and proposed work for the client. Reinforce the three energy action steps to which the client committed.

4. Complete the work. Summarize the day's work for the client.

5. Explain the next step- inspection.

<u>Inspection</u>

Reinforce the partnership between the Grantee and the client. Stress the importance of both the weatherization work and the client's action steps, and explain that a breakdown of either could result in less than adequate comfort and savings to the client.

The following minimum steps must be included in the Grantee's Energy Education Plan.

1. Ask the client about the weatherization work.

2. If appropriate, ask about the client's three energy action steps.

3. Inspect the work.

4. Follow up on referrals.

5. If follow up is provided, explain the next step.

The Grantee may wish to develop a Client Education Package to include the following items.

1. A generic letter introducing the Weatherization Assistance Program. See page 5.

2. An illustrated step-by-step energy savings guide. This could be distributed with the letter of introduction.

3. The client plan of action (required to be retained in the client file) and examples of energy action steps and the potential savings. See page 6 and 7.

4. A list of weatherization measures, which includes information relative to the contractor, if applicable. See page 9.

5. A generic letter to be provided to the client after the weatherization measures are completed. See page 10.

6. An illustrated guide for maintaining the weatherization measures installed.

7. A follow up survey. See page 11.

GRANTEE LETTERHEAD

Dear Homeowner/Renter:

The Michigan Weatherization Assistance Program, in which you are participating, is funded through the Michigan Department of Human Services. It is working to provide you with a warmer, more efficient home at no cost to you. This is not a welfare program, but rather a return on your tax dollars through federal funding. You may receive weatherization services only one time for this dwelling.

The weatherization improvements made are based on energy audit procedures established by the state to provide your home with the most cost effective energy conservation measures, within the limitations of the program. We wish we could provide for all the weatherization needs of your home, but this simply is not possible. However, there are many things you can do to lower the cost of high energy bills, as well as improve the comfort of your home. We will provide you with information regarding no cost/low cost do-it-yourself projects and ideas which could increase your savings by 15 percent to 20 percent.

The whole idea of the program is for us to work together, like partners, to make your home more comfortable, to save energy, to reduce your energy bills so your payments are more affordable.

This letter, and the enclosed step-by-step guide, is to introduce you to a free program which will provide you with energy conservation help and information. Our auditor will review with you *energy action steps* you can take right now. When the weatherization is completed, the inspector will give you some additional information on maintaining the work done to keep you on the road to greater energy savings!

We know this program will be of benefit and look forward to sharing money saving energy ideas with you.

Very Sincerely Yours,

CLIENT PLAN OF ACTION

CLIENT NAME:	
ADDRESS:	TELEPHONE NUMBER:
	JOB/CLIENT NUMBER:

The State of Michigan and the Local Weatherization Operator agree to provide, at no cost to the above client, energy conservation measures that prove to be cost effective according to the audit procedures determined by the State of Michigan. There is an 18 month warranty on the materials and workmanship provided.

I have explained the audit procedures and potential energy conservation measures to the client and it is understood that measures to be completed are based on the cost effectiveness and the needs of the household. This is a part of a total partnership approach between the client and the Local Weatherization Operator to reduce this family's energy bills.

Signature of Local Weatherization Operator Representative Date

I understand that the weatherization assistance is a one-time project for this home. But, by agreeing to a variety of Energy Action Steps, including those listed below, my family can make energy savings an on-going project in the home. Below I have identified three Energy Action Steps that I will try to make my home more energy efficient and comfortable.

1.
2.
3.

Signature of Client Date

EXAMPLES OF ENERGY SAVING TIPS

Identify three Energy Action Steps from below on the Client Action Plan that you will take to save money on your energy bills and to make your home more comfortable.

ACTION STEPS	POSSIBLE SAVINGS

SPACE HEATING	
1. Turn thermostat down to 70 degrees	3% per degree of average bill
2. Set back thermostat at night or when gone to 65 degrees	1% per degree
3. Close windows and storms in winter	$7 per window per year
4. Do not use space heaters (if at all possible)	$45 per month per space heater
5. Pull shades at dusk in winter	$10 to $25 per year
6. Do not use regular fireplaces to heat the house	The cost of wood. A fireplace does not reduce the furnace use.
HOT WATER	
7. Keep water setting at low.	$60 per year
8. Take seven minute showers	$72 per year
9. Wash clothes in cold water	$78 per year
10. Fix leaky faucets	$4 to $8 per year
11. Wash only full loads of clothes	$12 per year
APPLIANCES AND OTHER USES	
12. Unplug second refrigerator or freezer	$96 per year
13. Do not use air conditioner unless it is warmer than 78 degrees	3% per degree
14. Use fans instead of air conditioners	fanC$3 per month, air conditionerC$30 per month
15. Pull shades in the day during the summer.	$10 per window per year
16. Unplug unused appliances	$95 to $120 per year
17. Water heater: summer turn off winter put on timer	$28 per month
18. Cover waterbed when not in use	$41 to $47 per year
19. Hang clothes outside to dry in the summer	274 per load for an electric dryer
OTHER SUGGESTED ENERGY SAVING STEPS	
20. Move furniture blocking heating vents	Not quantifiable in dollars but increases comfort of home
21. Keep windows closed when air conditioner is on	Not quantifiable in dollars but increases comfort of home

WEATHERIZATION MEASURES

CLIENT INFORMATION	WEATHERIZATION CONTRACTOR INFORMATION
NAME:	NAME:
ADDRESS:	ADDRESS:
TELEPHONE:	TELEPHONE:

PRIORITY INSTALLED	YES	NO	COMMENTS
Health and Safety Measures			
Duct Sealing/Insulation			
Attic Insulation			
Foundation Perimeter Insulation			
Clock Thermostat			
Infiltration Measures			
Other:			

Local Weatherization Operator Inspector Date

GRANTEE LETTERHEAD

Dear Homeowner/Renter:

We have now completed the weatherization work on your home. We thank you for your cooperation and patience throughout the process from application through final inspection.

The work provided was based on the audit procedures set by the federal and state government. The weatherization work should provide you with significant energy savings and help lower heating bills.

However, by becoming involved yourself with the energy education guidelines you agreed to follow, you should be able to save up to 15 percent more. The Energy Action Steps you chose to take when our program began are already helping! There are more no cost/low cost projects you can do yourself to increase the energy efficiency and comfort of your home. The enclosed brochure will help you on your way. You will also find a survey. We urge you to take a few minutes to complete the survey and return it to our office.

We have some ideas for ways to increase the life and efficiency of the energy conservation measures that were applied to your home.

1. Make sure dirt, snow, and ice buildup is kept away from weather-stripping, thresholds, door sweeps, and doors.

2. Keep all sash locks locked to keep sashes from warping.

3. Close off all cold areas during the winter months.

4. If a hot water heater jacket was applied to your water heater, make sure it does not get torn or taken off. You may want to turn your water heater's temperature setting down to conserve energy now that it has been insulated.

5. If insulation was added to your home, <u>do not</u> store articles on it.

6. Make sure all storm windows are closed in the winter. If taken off in the summer, store them in a safe place.

7. Do not remove any weatherization materials that were applied to your home.

Remember, the whole idea of the program is for us to work together like partners to make your home more comfortable, to save energy, and to reduce your bills so your payments are more affordable.

Very Truly Yours,

WEATHERIZATION ENERGY EDUCATION
FOLLOW-UP SURVEY

OWNER/RENTER NAME	
ADDRESS	DATE
	TELEPHONE

	YES	NO
Did the weatherization staff fully explain the weatherization program to you? Comments:		
Did the weatherization staff explain to you the work they were going to do on your home before they started: Comments:		
Was the energy conservation material provided by the weatherization staff helpful? Comments:		
Have you taken any of the energy action steps agreed upon to increase your savings? Please list which ones below: 1. 2. 3.		
Do you like the work the weatherization crew/contractor did on your home? Were the materials and quality of the work as good as your expected? Comments:		
With the information you have now on no cost/low cost energy saving ideas, do you think you will continue to try more energy action steps to further save on your utility bills?		

Please rate your crew/contractor as follows:	Very Good	Good	Fair	Poor
Did the workers clean up after work each day?				
Were appointments made with you kept?				
How would you rate the quality of the workmanship?				
Were they courteous to you?				
Did they complete the work in a timely manner?				
Is your home more comfortable since the weatherization work has been completed?				
What is your overall ranking of the crew or contractor?				

Thank you for taking the time to give us this information. We use it to improve our program and the services we provide.

REFERENCES

- U.S. Department of Energy (DOE) –Weatherization Program Notice 16-1
- DOE Agreement

PURPOSE

To identify the allowable maximum average cost per unit for Program Year 2014.

The DOE Agreement, Section II.E.3., states:

> Grantees are expected to maintain an average cost per unit at or below the maximum allowable cost per unit as established in the Community Services Policy Manual. Grantees with an average that exceeds the maximum allowable cost per unit may not be reimbursed for the amount exceeding the maximum allowable average.

The Weatherization Assistance Program maximum allowable average is $7,105 for the program year July 1, 2016 through June 30, 2017.

POLICY

Grantees are expected to maintain an average cost per unit at or below $7,105. Support, labor, and materials costs are included in the calculation of the average cost per unit.

Grantees with an average that exceeds the maximum allowable cost per unit may not be reimbursed for the amount exceeding the maximum allowable average. If at the end of the grant period the Grantee has been reimbursed over the maximum allowable average, the Grantee will be responsible for returning the overage amount to BCAEO.

REFERENCES

- Department of Energy Weatherization Assistance Program State Plan
- Technical Weatherization Policy Manual
- DOE Weatherization Program Notice 02-01, 11-06, 13-4
- NREL Standard Work Specifications

PURPOSE

The State Plan for the Weatherization Assistance Program (WAP) addresses health and safety (H&S) provisions. The Technical Weatherization Policy (TWP) Manual provides for health and safety guidelines.

POLICY

Heath and Safety (H&S) funds may be used for:

- The elimination of energy related health and safety hazards, that are necessary before or because of the installation of weatherization measures (does not include windows and doors) and,

- Lead Safe Weatherization (LSW). Per Department of Energy (DOE) Weatherization Program Notice 02-01, page 18: "The cost of Lead Safe Weatherization is a health and safety cost. Therefore, all labor, material, and related costs are not subject to the average cost per home limitation for those States which choose to report health and safety costs separately. Additionally, equipment purchases used specifically for testing for lead or other health risks do not need to be included in the average cost per home limitation. No amortization of equipment cost of $5,000 or more would be necessary for items not included in the average cost per home."

To ensure that program services concentrate on energy efficient measures, H&S measures must not total more than 50% of the total job cost. If health and safety costs of a job do exceed more than 50% of the total job costs, the Grantee may submit a waiver for approval from technical staff. The Grantee is responsible for documenting the email approval from the technical staff and including it with the file documentation. Buildings that cannot be weatherized without the H&S measures shall be deferred. H&S measures are not considered as part of the cumulative SIR and do not need an SIR to install.

NOTE: DOE funds shall not be used to meet code compliance.

Health & Safety measures do not require an SIR and are not included in the Average Cost Per Unit. Health & Safety measures are billed to their own line item.

Mandatory Health & Safety Measures

- Installation of smoke detectors shall be placed in accordance with all State Of Michigan and Local Fire/Building Codes.
- Clothes dryers shall be vented to the exterior.
- Ventilation to meet ASHRAE 62.2 requirements 2013 or later
- Carbon Monoxide (CO) Alarm/Detector in all residences containing a combustion appliance or an attached garage.

Health & Safety Inspection/Testing Requirements

All dwellings weatherized require an audit and inspection, health and safety inspection, and testing. An audit of the home does include the Health and Safety Protocol as defined by DOE. (see WPN 11-6 and WPN 11-6A) The Protocol includes the following in the order listed:

1. Gas Leak test in and around the home
2. Ambient Air test for Carbon Monoxide (CO)
3. CAZ testing of all vented Combustion Appliances
4. Zone Pressure Diagnostic test when dwelling has an attached or “Tuck-Under” garage.
5. ASHRAE 62.2 Standards (reference WPN 11-6)

Health & Safety Concerns

<u>Asbestos</u>
Asbestos fibers are microscopic. When disturbed and released into the air, the fibers can be inhaled. Significant exposure may result in lung cancer, asbestosis, or Mesothelioma. Known asbestos containing building components shall not be handled during the course of weatherization work in a way which would cause the transmission of asbestos dust into the air. Reference WPN 11-06

Friable asbestos is any asbestos containing product which can be crumbled, pulverized, or reduced to powder by hand pressure. Friable asbestos shall not be touched. If suspected friable asbestos is found in a home, written notification shall be provided to the client/owner. Notice of Asbestos (DHS-4290) is located in the forms section at the

end of this manual. A copy of the written notification shall be maintained in the client file.

- Weatherization work is not required in areas where asbestos may be disturbed.
- If a weatherization measure is deleted due to the presence of asbestos, proper documentation shall be provided on the SOM Approved Audit.
- This decision would normally be made by the Energy Auditor.
- If the contractor or crew determines the presence of asbestos which would affect their ability to complete a prescribed weatherization measure in a safe manner without creating/disturbing asbestos dust, they shall notify the Grantee and the measure shall be deleted (again, proper documentation shall be provided on the SOM Approved Audit).
- Contractors and crews shall not be penalized for refusing to work on asbestos-sided dwellings.
- Further information on the DOE requirements are available at: http://www.waptac.org

Carbon Monoxide

CO is a direct and cumulative poison. When combined with blood hemoglobin, CO replaces oxygen in the blood until it completely overcomes the body. Low level CO poisoning symptoms include headaches, confusion, dizziness, nausea, vomiting, convulsions, sleepiness, stinging eyes, and loss of muscular control. Death from CO poisoning occurs suddenly. A victim inhaling a toxic concentration of the gas may become helpless before realizing that danger exists. Effects can vary significantly based on age, sex, weight, and overall state of health. Children, the elderly and the infirm may be seriously affected by even low levels of CO depending on the concentration and exposure period.

Potential CO related health and safety concerns shall be discussed with the client. The client shall be immediately advised of any serious concerns relative to CO. If CO testing indicates a CO problem, a Notice of Indoor Air Quality Concern, DHS-4289 shall be provided.

Indoor Air Quality

Audit procedures shall include a visual review and discussion with the client relative to potential indoor air quality (IAQ) problems, such as:

- Combustion by-products/carbon monoxide
- Unstable lead-based paint
- Friable asbestos

If IAQ problems are found, the client shall be advised and written notification shall be provided to the client, landlord, owner, and/or his/her agent. A copy of the written notice shall be maintained in the client file. Notice of Indoor Air Quality (DHS-4289) is located in the forms section at the end of this manual.

Where possible, "incidental repairs" or "health and safety" measures may be completed to correct IAQ problems in order to allow weatherization work to take place. Client education shall be provided where appropriate

In addition to asbestos, carbon monoxide, and lead based paint which are addressed in this section, other IAQ concerns may include:

- Volatile Organic Compounds (VOC): Cleaning fluids, paints, solvents, herbicides, pesticides, and formaldehyde. Known to be potential irritants to lungs, eyes, and skin. Some VOCs may be carcinogenic. VOCs are frequently stored under sinks, in closets, and basements. Formaldehyde may be found in a variety of building components including plywood, carpeting, and particle boards. Recommend moving potentially dangerous material outside of living space into sheds or garages. Basements are not recommended for storage, particularly if leaky ductwork exists.
- Airborne Particulate Matter: Primarily tobacco smoke or smoke from improperly vented wood stoves. It is known to cause lung cancer. Excessive air-tightening can increase levels of carcinogenic by-products in dwellings. Dwellings with high levels of tobacco smoke or other indoor pollutants shall not be over tightened
- Fiberglass: Fibrous glass insulation material. Known to be an irritant to lungs, eyes and skin. Most preliminary research indicates no long-term negative health effects resulting from exposure to high levels of fiberglass, but some studies have indicated that some types of finely chopped blown-in fiberglass may be a potential carcinogen. Exposed fiberglass shall not be left in occupied areas of dwellings. Workers are advised to wear properly rated respirators and protective clothing when working with or around fiberglass.
- Raw Sewage/Methane Gas: Workers must take precautions to avoid direct contact with raw sewage or other unsanitary conditions. Clients must be informed of existing conditions and referred to available resources for assistance.

<u>Mold & Moisture Assessment</u>

Molds, mildew and spores are primarily caused by excessive moisture levels in the home. Mold remediation is not an allowable DOE expense. These substances can be a significant contributing factor in a number of health problem. Excessive moisture in a home provides and environment that allows mold and mildew to flourish. Dwellings with

serious moisture problems shall not be tightened until measures are taken to mitigate the moisture sources.
All dwellings shall be checked for previous or existing moisture problems. Audit procedures shall include a mold and moisture assessment. The assessment shall be a visual review that includes these four categories:

- General building envelope
- Outside/Site
- HVAC
- Occupied space

Lead Paint
Lead paint removal is not an allowable activity under the Weatherization Assistance Program.

To minimize risks to clients and weatherization personnel:

- Provide clients and workers with Renovate Right Brochure available at www.epa.gov/lead.
- All weatherization contractors, crew persons, Energy Auditors and QC Inspectors are to be trained and certified in Lead Safe Weatherization (LSW).
- All local weatherization operator staff, QC Inspectors, contractors, and crews, must be in compliance with:
    - Environmental Protection Agency's LRRPP Rule requirements
    - All Federal, state, and local regulations
    - OSHA rules for worker safety
    - All State and local rules for waste disposal

- Do not disturb lead based paint particularly in dwellings with small children.
- Staff and contractors shall assume that any paint on windows and doors contains lead, unless it has been verified otherwise.

If paint chips/dust results from weatherization work, the area shall be cleaned in accordance with LSW Practices.

Ingestion or absorption of lead into the blood stream is a serious health hazard causing brain damage over a period of time. This can be a particularly serious problem with small children, who may ingest paint chips or flakes or dust contaminated with lead products. Serious learning disabilities can result from excessive lead levels in the bloodstream. Workers can be contaminated in the same way as children, but are most

likely to be exposed by breathing dust created by sanding or planning surfaces that contain lead based paints.

Lead paint is the primary source of lead in a home. Contamination occurs when lead paint is disturbed by sanding, chipping, or flaking.

Wiring

- Electric shock while working around wiring.
- Fire resulting from arcing between loose wiring connections
- Fire resulting from lack of dissipation of heat due to insulation over/around heat producing sources.
- Integrity and safety of knob and tube wiring.

CSPM 614 Attachment A

Budgeting (Check one):

Separate Health & Safety Budget	☑
Contained in Program Operations	☐

Incidental Repairs:

No additional items to be included.

Health and Safety Expenditure Limits

Per-Unit Average Percent: 15% is approximately the Health & Safety per unit average. The job Health & Safety maximum amount shall not exceed more than 50% of the total job costs. If costs exceed these limits, BCAEO technical staff must review and approve.

Deferral Policy

The Grantee is required to have a written deferral policy which is in the best interest for its service area. Examples of reasons to defer a unit scheduled to be weatherized include:

- Standing water, mold, friable asbestos, deteriorated lead-based paint surfaces or other hazardous materials that cannot be addressed by the weatherization work.
- Evidence of infestations of rodents, insects, and/or other vermin.
- Unvented space heater(s) that may have a harmful effect on the air quality of the home in compliance with DOE WPN 08-4.
- Unsecured pets that may prevent workers from safely completing their work.
- The presence of sewage or animal feces in or around the home.
- Improperly stored chemicals, combustible materials, or other fire hazards that present a danger to the occupants or the workers.
- Maintenance or housekeeping practices that limit the access of workers to the dwelling or create an unhealthy work environment.
- Remodeling is in progress, which limits the proper completion of weatherization measures.
- The home receives HUD funding and at the time of completion, the unit will not meet applicable HUD Lead-Based Paint standards.
- Electrical or plumbing hazards or structural failures that cannot be addressed/completed within Incidental Repair or Health and Safety cost limitations.
- Threat(s) of violence or abusive behavior to worker(s) or household member(s) during the weatherization process.
- The illegal presence or use of any controlled substance in the home during the weatherization process.
- Occupant has known health conditions that prohibit and/or limit the installation of insulation or other weatherization materials.
- The building or dwelling unit is for sale or in foreclosure.
- Ownership cannot be confirmed due to a legal dispute. Clear title must be established before services can be provided.
- The building or dwelling unit is scheduled for demolition/redevelopment.

Note: When the QC Inspector or any other weatherization employee encounters an unsafe or inoperable heating appliance during the heating season, weatherization work should not proceed until the condition is corrected.

Grantees are required to have a written deferral policy that outlines the procedures to be followed when making a deferral decision and notifying the customer. It should include guidelines for establishing a time period for correction and an identification of resources and options to assist the applicant.

When service is deferred, the owner or occupant should be given a reasonable timeframe to correct/eliminate the problem. Examples of reasonable timeframes would be 30 days for housekeeping concerns or 90 days for remodeling work.

Deferral Notification Requirements

Upon the decision to defer weatherization program services, the customer must be notified in writing within five working days.

The notice must include the reason for the deferral, and the means by which the applicant can rectify the situation so the weatherization measures can be performed. The requirements for rectifying the deferral must be reasonable and appropriate to the severity of the situation being addressed. Any eligible applicant that complies fully with these requirements shall be reinstated in the Grantee's work system so weatherization work can progress as soon as reasonably possible.

There is no time extension for the eligibility period due to a deferral. If the dwelling cannot be reported as complete within the eligibility period, the customer must reapply for weatherization assistance. On a deferred unit, photographs documenting the reason for deferral (mold or other problems) are required and shall be part of the client file. If photographs are unobtainable, the reason(s) must be documented in the client file.

Procedure for Identifying Occupant Health Concerns:

Interview procedures at the time of application for Weatherization Services. Completion of DHS Form 552 and 552a at the time of application and prior to conducting the audit.

Documentation Form(s) have been developed (Check Yes or No):

Yes ☑

No ☐

How the WPN 11-6 requirements will be addressed.

Air Conditioning and Heating Systems

Concurrence or Alteration:

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding:

DOE funds are being used.

Beyond Scope of DOE WAP:

The project shall be deferred until additional funds can be secured (from listed sources below) to cover costs exceeding the H&S budgeted amount. Alternate funding such as LIHEAP, MPSC, HUD, USDA, Municipal Health Department and Emergency Funds shall be utilized to address this particular health and safety category. Other local funding may be available and utilized.

Standards for Remedy:

Gas Leak testing, CO testing (ambient air), Worst Case Draft/Spillage Testing (CAZ), Attached garage ZPD, Correctly identified CAZ area, LSW (sidewall test), Blower door testing/calculations.
Partial weatherization would not be considered.

Standards for Deferral:

Standing water, mold, friable asbestos, deteriorated lead-based paint surfaces or other hazardous materials that cannot be addressed by the weatherization work.

Evidence of infestations of rodents, insects, and/or other vermin.

Unvented space heater(s) that may have a harmful effect on the air quality of the home in compliance with DOE WPN 08-4.

Major remodeling is in progress, which limits the proper completion of weatherization measures.

The home receives HUD funding and at the time of completion, the unit will not meet applicable HUD Lead-Based Paint standards.

Electrical or plumbing hazards or structural failures that cannot be addressed/completed within Incidental Repair or Health and Safety cost limitations.

Occupant has known health conditions that prohibit and/or limit the installation of insulation or other weatherization materials.

Note: When the Energy Auditor or any other weatherization employee encounters an unsafe or inoperable heating appliance during the heating season, weatherization work should not proceed until the condition is corrected.

Alternate funding such as LIHEAP, MPSC, HUD, USDA, Municipal Health Department and Emergency Funds shall be utilized to address this particular health and safety category.

Standards for Referral:

The project shall be referred to alternate funding sources when scope of work exceeds maximum budgeted Health and Safety amount.

Alternate funding such as LIHEAP, MPSC, HUD, USDA, Municipal Health Department and Emergency Funds shall be utilized to address this particular health and safety category.

Training Provision:

LSW, IAQ, and ASHRAE 62.2 Training shall be provided on a quarterly basis as needed.

Client Education:

Client education is provided during the energy audit, installation of measures, and during the QCI inspection.

Disposal Procedures:

Disposal Procedures shall be in compliance with all local, state and federal EPA requirements.

Air Conditioning Installation (as specific to installation as a health and safety measure):

Air Conditioning Installation (as specific to installation as a health and safety measure): Shall be provided by an alternative funding source not with WAP funding. Provide a narrative on implementation protocols of air conditioning repair, replacement, and installation including justification for allowably that includes climate justification with degree days and how to define “at-risk” occupants

Heating System Installation (as specific to installation as a health and safety measure

Heating systems will be replaced as health and safety if the auditor or mechanical contractor has determined the system is a health or safety issue for the household. Additionally, the audit shows that the replacement is not an energy saving measure.

Appliances and Water Heaters

Concurrence or Alteration:

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding:

DOE funds are being used.

Beyond Scope of DOE WAP:

The project shall be deferred until additional funds can be secured (from listed sources below) to cover costs exceeding the H&S expenditure limits.

Standards for Remedy

Gas Leak testing, CO testing (ambient air), Worst Case Draft/Spillage Testing (CAZ).

Standards for Deferral:

The project shall be deferred until additional funds can be secured (from listed sources below) to cover costs exceeding the H&S budgeted amount.

Standards for Referral:

The project shall be referred to alternate funding sources when scope of work exceeds allowable cost limits. Alternate funding shall be utilized to address this particular health and safety category.

Training Provision

Training shall be provided through the State of Michigan Mechanical Codes Training Division and other Federally funded training facilities.

Client Education:

Client Education is provided during the intake application process, during the audit, and upon final inspection.

Disposal Procedures:

Disposal Procedures shall be in compliance with all local, state and federal EPA requirements.

Asbestos - in siding, walls, ceilings, etc.

Concurrence or Alteration:

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding:

This is not allowed, and all jobs where Asbestos is identified to be present in siding, walls, ceilings, etc. will be deferred. USDA, Municipal Health Department and Emergency Funds shall be utilized to address this particular health and safety category. Other local funding may be available and utilized.

Beyond Scope of DOE WAP:

The project shall be deferred until the site is tested and found to be within safe levels in compliance with all local, state and federal EPA requirements.

Standards for Remedy:

This project shall be deferred to the Local Health Department or other EPA affiliate to determine presence of asbestos.

Standards for Deferral:

If site is found to have asbestos and unable to concur with WPN 11-6, this project shall be deferred until all asbestos materials have been safely removed and disposed of by an authorized agency.

Standards for Referral:

If site is found to have asbestos and unable to concur with WPN 11-6, this project shall be deferred until all asbestos materials have been safely removed and disposed of by an authorized agency. Local Health Department and Environmental Protection Agency.

Training Provision:

Training will not be provided in the State of Michigan Health and Safety Plan.

Client Education:

Referral to the local Health Department is recommended.

Disposal Procedures:

Disposal Procedures shall be in compliance with all local, state and federal EPA requirements.

Asbestos - in vermiculite

Concurrence or Alteration:

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding:

The State of Michigan will defer all units which have vermiculite installed within a project. USDA, Municipal Health Department and Emergency Funds shall be utilized to address this particular health and safety category. Other local funding may be available and utilized.

Beyond Scope of DOE WAP:

The project shall be deferred until the site is tested and found to be within safe levels in compliance with all local, state and federal EPA requirements.

Standards for Remedy:

This project shall be deferred to the Local Health Department or other EPA affiliate to determine presence of asbestos.

Standards for Deferral:

If site is found to have asbestos, this project shall be deferred until all asbestos materials have been safely removed and disposed of by an authorized agency.

Standards for Referral:

If site is found to have asbestos, this project shall be deferred until all asbestos materials have been safely removed and disposed of by an authorized agency. Local Health Department and Environmental Protection Agency.

Training Provision:

Training will not be provided in the State of Michigan Health and Safety Plan.

Client Education:

Referral to the local Health Department is recommended.

Disposal Procedures:

Disposal Procedures shall be in compliance with all local, state and federal EPA requirements.

Asbestos - on pipes, furnaces, other small covered surfaces

Concurrence or Alteration:

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding

DOE funds are being used to address small covered surfaces amounting to less than 10 sq. ft. and costing less than $200.00

Beyond Scope of DOE WAP:

The project shall be deferred until the site is tested and found to be within safe levels in compliance with all local, state and federal EPA requirements.

Standards for Remedy:

This project shall be deferred to the Local Health Department or other EPA affiliate to determine presence of asbestos.

Standards for Deferral:

If site is found to have asbestos, this project shall be deferred until all asbestos materials have been safely removed and disposed of by an authorized agency.

Standards for Referral:

If site is found to have asbestos, this project shall be deferred until all asbestos materials have been safely removed and disposed of by an authorized agency. Local Health Department and Environmental Protection Agency.

Training Provision:

Training will not be provided in the State of Michigan Health and Safety Plan.

Client Education

Referral to the local Health Department is recommended.

Disposal Procedures:

Disposal Procedures shall be in compliance with all local, state and federal EPA requirements.

Biologicals and Unsanitary Conditions - odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.

Concurrence or Alteration:

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding:

DOE Funds will not be used beyond incidental repairs. USDA, Municipal Health Department and Emergency Funds shall be utilized to address this particular health and safety category. Other local funding may be available and utilized.

Beyond Scope of DOE WAP:

Client education and deferral to local Housing Funded programs and Health Department.

Standards for Remedy:

Visual inspection followed with issuing a Notice of Potential Hazard defining deferring all weatherization work until condition has been eliminated.

Standards for Deferral

After a visual inspection was conducted (usually during the audit)

Standards for Referral:

The Notice of Potential Hazard defines a condition to be eliminated and if outside the scope of client maintenance, a referral is made to the local Health Department and or SOM Emergency Services (when funds are available and client is eligible), USDA and HUD.

Training Provision:

Through local Health Department and the State Extension office

Client Education

EPA handout on remedying Mold and mildew issues when applicable.

Disposal Procedures:

Disposal shall meet all local landfill environmental requirements including compliance with EPA.

Building Structure and Roofing

Concurrence or Alteration

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding:

DOE funds will be used for incidental repairs of Building Structure and Roofing

Beyond Scope of DOE WAP:

Project will be deferred until area of repairs can be corrected eliminated through other funding sources.

Standards for Remedy:

A visual inspection shall be followed up with the issuance of the appropriate Notice of potential hazard.

Standards for Deferral:

When conditions are not safe for workers or the residents to start or continue with the Weatherization Project.

Standards for Referral:

Referral shall be made through the Notice of Potential Hazard and recommendations to seek a building inspection by a licensed building QC Inspector or contractor.

Training Provision:

DOE funds will not be used in providing training to assess this condition.

Client Education

Energy Auditors shall inform the residents of the potential hazard and recommendation to seek remedy of the condition

Disposal Procedures:

Disposal shall meet all local landfill environmental requirements including compliance with EPA

Code Compliance

Concurrence or Alteration

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding:

DOE funds shall not be used to meet Code Compliance. USDA, Municipal Health Department and Emergency Funds shall be utilized to address this particular health and safety category. Other local funding may be available and utilized.

Beyond Scope of DOE WAP:

A deferral of weatherization work will occur until the required Code compliance is met.

Standards for Remedy:

When identified Code violations shall be listed on a Notice of Potential Hazard, and issued to the occupant.

Standards for Deferral:

When a condition cannot be corrected within the Incidental Repair costs category.

Standards for Referral:

Referrals shall be made to local building inspection agents and item of Code incorrectness listed on the Notice of Potential Hazard.

Training Provision:

DOE funds will not be used in providing training to assess this condition.

Client Education:

Energy Auditors shall inform the residents of the potential hazard and recommendation to seek remedy of the condition

Disposal Procedures:

Disposal shall meet all local landfill environmental requirements including compliance with EPA

Combustion Gases

Concurrence or Alteration:

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding:

DOE funds are being used.

Beyond Scope of DOE WAP:

A deferral of weatherization work will occur until the required corrective measures have been completed and inspected by local Code officials.

Standards for Remedy:

Health and Safety protocol testing provides detection with air sampling equipment to determine elevated levels of combustion gases and their byproducts.

Standards for Deferral:

When elevated levels are detected, all weatherization work is suspended until a safe environment is restored.

Standards for Referral:

When weatherization funds cannot address the listed Health and Safety condition, a referral is made to local housing programs and emergency fund sources.

Training Provision:

State of Michigan trains inspection candidates on ways to determine air samples which would identify potentially hazardous condition within and around the residential dwelling.

Client Education:

A Notice of Potential Hazard is issued with a detailed listing of the areas in which the condition presented elevated levels of combustion gas and its byproducts.

Disposal Procedures:

Field Standard will identify disposal procedures when applicable.

Combustion Gas Problem Discovery

State of Michigan trains inspection candidates on ways to determine air samples which would identify potentially hazardous condition within and around the residential dwelling. A Notice of Potential Hazard is issued with a detailed listing of the areas in which the condition presented elevated levels of combustion gas and its byproducts.

Drainage - gutters, down spouts, extensions, flashing, sump pumps, landscape, etc.

Concurrence or Alteration:

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding:

DOE funds are being used.

Beyond Scope of DOE WAP

When the scope of work exceeds the incidental repair budget, the job shall be deferred until the condition is remedied

Standards for Remedy:

If drainage is creating a mold or mildew condition within the dwelling. The condition will be assessed for remedial repairs and instruction to the client on process to eliminate the mold/mildew condition.

Standards for Deferral:

If a condition exceeds the incidental repair budget, all weatherization work shall be deferred until the repair has been completed.

Standards for Referral:

When weatherization funds cannot address the listed Health and Safety condition, a referral is made to local housing programs and emergency fund sources

Training Provision:

Through the State of Michigan IAQ training, local Health Department and the State Extension office

Client Education:

EPA handout on remedying Mold and mildew issues when applicable.

Disposal Procedures:

Disposal shall meet all local landfill environmental requirements including compliance with EPA.

Electrical, other than Knob-and-Tube Wiring

Concurrence or Alteration:

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding:

DOE Funds will not be used beyond incidental repairs. USDA, Municipal Health Department and Emergency Funds shall be utilized to address this particular health and safety category. Other local funding may be available and utilized.

Beyond Scope of DOE WAP:

Project will be deferred.

Standards for Remedy:

Deferral of project until licensed electrical inspection is conducted and confirms electrical upgrade is required. USDA, Municipal Health Department and Emergency Funds shall be utilized to address this particular health and safety category. Other local funding may be available and utilized.

Standards for Deferral:

When the scope of work exceeds incidental cost budget.

Standards for Referral:

When the scope of work exceeds incidental cost budget.

Training Provision:

DOE Funds will not be used for training. State of Michigan Electrical Board supplies training curriculum.

Client Education:

If electrical hazard is observed, a written Notice of Potential Hazard is delivered to the occupant with specific recommendations to seek professional remedy through a Licensed Electrical Contractor.

Disposal Procedures:

Field Standards

Electrical, Knob-and-Tube Wiring

Concurrence or Alteration:

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding:

DOE funds are being used, within Incidental Repair budget limits.

Beyond Scope of DOE WAP:

Project will be deferred.

Standards for Remedy:

Deferral of project until licensed electrical inspection is conducted and confirms electrical upgrade is required. USDA, Municipal Health Department and Emergency Funds shall be utilized to address this particular health and safety category. Other local funding may be available and utilized.

Standards for Deferral:

When the scope of work exceeds incidental cost budget.

Standards for Referral:

When the scope of work exceeds incidental cost budget.

Training Provision:

DOE Funds will not be used for training. State of Michigan Electrical Board supplies training curriculum.

Client Education:

If electrical hazard is observed, a written Notice of Potential Hazard is delivered to the occupant with specific recommendations to seek professional remedy through a Licensed Electrical Contractor.

Disposal Procedures:

Field Standards

Fire Hazards

Concurrence or Alteration:

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding:

DOE funds shall be utilized within incidental repair limits

Beyond Scope of DOE WAP:

Project will be deferred.

Standards for Remedy: .

A Notice of Potential hazard shall be issued to the occupant.

Standards for Deferral:

When the scope of work exceeds the budgeted cost category.

Standards for Referral:

When an element is clearly identified a referral is made to the appropriate local licensed authority.

Training Provision:

DOE funds will not be utilized in training.

Client Education:

A Notice of Potential Hazard is issued with instructions to seek further review by the local licensed authority.

Disposal Procedures:

Field Standards.

Formaldehyde, Volatile Organic Compounds (VOCs), and other Air Pollutants

Concurrence or Alteration:

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding:

DOE Funds will not be used beyond incidental repairs. USDA, Municipal Health Department and Emergency Funds shall be utilized to address this particular health and safety category. Other local funding may be available and utilized.

Beyond Scope of DOE WAP:

All work shall be deferred.

Standards for Remedy:

A Notice of Potential hazard shall be issued to the occupant.

Standards for Deferral:

When the listed Hazard is present on site.

Standards for Referral

When the listed Hazard is present on site.

Training Provision:

DOE funds will not be used.

Client Education:

A Notice of Potential hazard shall be issued to the occupant.

Disposal Procedures:

Field Standard

Injury Prevention of Occupants and Weatherization Workers – Measures such as repairing stairs and replacing handrails.

Concurrence or Alteration:

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding:

DOE Funds will not be used beyond incidental repairs. USDA, Municipal Health Department and Emergency Funds shall be utilized to address this particular health and safety category. Other local funding may be available and utilized.

Beyond Scope of DOE WAP:

All work shall be deferred.

Standards for Remedy:

A Notice of Potential hazard shall be issued to the occupant.

Standards for Deferral:

When the listed Hazard is present on site.

Standards for Referral:

When the listed Hazard is present on site.

Training Provision:

DOE funds will not be used.

Client Education:

A Notice of Potential hazard shall be issued to the occupant.

Disposal Procedures: Provide disposal procedures or indicate where these procedures can be found in the Plan or Field Standards.

Field Standard

Lead Based Paint

Concurrence or Alteration:

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding:

DOE funds are being used.

Beyond Scope of DOE WAP:

Work shall be deferred until remedy is reached.

Standards for Remedy:

LSW work practices shall be utilized.

Standards for Deferral:

When scope of work exceeds Health and Safety budget limits.

Standards for Referral:

A Notice of Potential Hazard is issued.

Training Provision:

LSW training is administered through the State of Michigan WAP. RRP training provided through EPA accredited trainers. Training requirements are listed in TWP section 4504.

Client Education:

Issue EPA pamphlet or safe work practices around the home.

Disposal Procedures:

Field Standard

Lead Based Paint Compliance:

Listed in SOM Technical Weatherization Policies and Community Services Policy Manual.

Mold and Moisture

Concurrence or Alteration:

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding:

DOE Funds will not be used beyond incidental repairs. Other funds may be available and utilized.

Beyond Scope of DOE WAP:

Defer all work

Standards for Remedy:

Visual inspection and issuance of EPA guidelines/pamphlet for remedy.

Standards for Deferral:

When area of mold exceeds 10 square feet, a deferral of all work will become effective.

Standards for Referral:

A Notice of Potential Hazard is issued.

Training Provision:

SOM will provide the EPA/DOE IAQ Training curriculum

Client Education:

Visual inspection and issuance of EPA guidelines/pamphlet for remedy.

Disposal Procedures:

Field Standard

Mold Protocols:

SOM Technical Weatherization Policy and Community Services Policy Manual describes protocols.

Occupant Preexisting or Potential Health Conditions

Concurrence or Alteration:

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding:

DOE Funds will not be used. USDA, Municipal Health Department and Emergency Funds shall be utilized to address this particular health and safety category. Other local funding may be available and utilized.

Beyond Scope of DOE WAP:

Defer all work.

Standards for Remedy:

Defer all work.

Standards for Deferral:

When preexisting conditions or potential health conditions are witnessed, a deferral of all WAP services will be authorized.

Standards for Referral:

When an element is clearly identified a referral is made to the appropriate local licensed authority.

Training Provision:

Training will not be provided using DOE WAP funding.

Client Education:

A Notice of Potential Hazard may be issued detailing specific remedy to observed H&S subject.

Disposal Procedures:

Field Standards

Occupational Safety and Health Administration (OSHA) and Crew Safety

Concurrence or Alteration:

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding:

DOE Support funds can be used to cover these training costs.

Beyond Scope of DOE WAP:

Training costs are a support cost and will be covered within T/TA budget.

Standards for Remedy

State of Michigan Techncial Weatherization conduct onsite monitoring visits to provide T/TA. The State of Michigan has it's own OSHA office which conducts training and oversight for worker safety.

Standards for Deferral:

NA

Standards for Referral

Refer workers to OSHA training centers.

Training Provision:

Through MIOSHA

Client Education:

NA

Disposal Procedures:

NA

OSHA and MSDS Compliance:

This is detailed in SOM Technical Weatherization Policy and Retrofitting Michigan- Technical Weatherization Field Guide

Pests

Concurrence or Alteration:

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding:

DOE funds will not be used. Local Heath Department funding or other local funds when available.

Beyond Scope of DOE WAP:

All work will be deferred until all Pests are eliminated from work site.

Standards for Remedy:

Issue a Notice of Potential Hazard to the occupant.

Standards for Deferral:

When pests and their byproducts are present and pose a hazard to workers and inspection staff.

Standards for Referral:

When pests and their byproducts are present and pose a hazard to workers and inspection staff.

Training Provision:

OSHA training may be utilized.

Client Education:

A Notice of Potential Hazard may be issued.

Disposal Procedures:

NA

Radon

Concurrence or Alteration:

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding:

DOE Funds will not be used. USDA, Municipal Health Department and Emergency Funds shall be utilized to address this particular health and safety category. Other local funding may be available and utilized.

Beyond Scope of DOE WAP:

A referral will be made to the Local Health Department.

Standards for Remedy:

All WAP services will be deferred.

Standards for Deferral:

If Radon is suspected to be present on site.

Standards for Referral:

Written Notice of Potential Hazard shall be issued to the occupant.

Training Provision:

DOE funds will not be used for this training.

Client Education:

Recommendation to local licensed authority for testing protocol.

Disposal Procedures:

NA

Refrigerant

Concurrence or Alteration:

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding:

NA

Beyond Scope of DOE WAP:

NA

Standards for Remedy:

NA

Standards for Deferral:

NA

Standards for Referral

NA

Training Provision:

NA

Client Education:

NA

Disposal Procedures:

NA

Smoke, Carbon Monoxide Detectors, and Fire Extinguishers

Concurrence or Alteration:

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding:

DOE funds are being used.

Beyond Scope of DOE WAP:

Local enforcement may require interconnected alarms.

Standards for Remedy

When a fuel combustion appliance is present in the dwelling a garage is attached a carbon monoxide alarm/detector shall be installed in compliance with NFPA 720. SOM Technical Weatherization Policies Section 2101-3 and 3907 for further testing requirements along with the Retrofitting Michigan Weatherization Field Guide.

2101-3 CARBON MONOXIDE (CO) ALARM /DETECTOR

Carbon Monoxide (CO) alarms shall be installed in each dwelling unit in compliance with NFPA 720. CO alarms shall be installed in all residences containing a combustion appliance or an attached garage. Standard for the installation of CO Detection and Warning Equipment shall be consistent with the requirements of applicable laws, codes, standards, and manufacturer's installation guidelines (reference ANSI/UL 2034-09).

Potentially unsafe CO levels determined during the audit shall be documented and written notice shall be provided to the client/landlord/property owner and documented electronically on the SOM approved field audit. A copy of the notice shall be maintained in the client/job file, Notice of Unsafe Conditions (DHS-4288) is located in the forms section at the end of this manual. Carbon monoxide alarms shall be installed by the Energy Auditor during the audit on in a dwelling under the following circumstances:

- Whenever a local agency must defer work and the dwelling unit contains an unsafe combustion appliance
- A combustion appliance is emitting unsafe levels of CO that cannot be immediately remedied
- A combustion appliance has minimal draft and/or spillage and no CO is being produced
- The dwelling contains a fireplace or wood burning stove that draws combustion air from inside the dwelling.

https://sws.nrel.gov/spec/203012

Standards for Deferral:

All air sealing shall be deferred until elevated levels of CO is reduced/eliminated.

Standards for Referral:

When scope of work exceeds H&S budget category.

Training Provision:

Training is provided utilizing DOE Grant funds.

Client Education:

A Notice of Potential Hazard or Air Quality Standards is issued detailing remedial action the client should take.

Disposal Procedures:

Field Standard

Smoke/CO Detector Installation:

SOM Technical Weatherization Policy Manual and Community Services Policy Manual detail placement and procedures.

Solid Fuel Heating (Wood Stoves, etc.)

Concurrence or Alteration:

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding:

DOE funds are being used within budget limits.

Beyond Scope of DOE WAP:

Deferred.

Standards for Remedy:

Issue a Notice of Potential Hazard to occupant.

Standards for Deferral:

When a potential hazard is present involving a solid fuel (wood stove).

Standards for Referral:

When a potential hazard is present involving a solid fuel (wood stove) and the source cannot be eliminated. A referral to alternate funding sources to eliminate hazard would be warranted.

Training Provision:

DOE funds would be used in training QC Inspector candidates.

Client Education:

A Notice of Potential Hazard would be issued to the occupant.

Disposal Procedures:

Field Standard.

Space Heaters, Stand Alone Electric

Concurrence or Alteration:

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding:

DOE Funds will not be used. USDA, Municipal Health Department and Emergency Funds shall be utilized to address this particular health and safety category. Other local funding may be available and utilized (compliance with WPN 08-4).

Beyond Scope of DOE WAP:

Defer all WAP services.

Standards for Remedy:

Issue a Notice of Potential Hazard to occupants.

Standards for Deferral:

When a hazardous electric heater is used for other than temporary basis, or if the installation is in a hazardous location.

Standards for Referral:

When a permanent heat source cannot be installed.

Training Provision:

During QC Inspector classes provided through the SOM and DOE funds.

Client Education:

Issue a potential hazard notice detailing safe usage of temporary heat sources.

Disposal Procedures:

Field Standard

Space Heaters, Unvented Combustion

Concurrence or Alteration:

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding:

DOE Funds will not be used. USDA, Municipal Health Department and Emergency Funds shall be utilized to address this particular health and safety category. Other local funding may be available and utilized.

Beyond Scope of DOE WAP:

A Notice of Potential Hazard shall be issued until the non-vented device is removed from the site.

Standards for Remedy:

No WAP services will be rendered until the non-vented device is removed from the dwelling, and the fuel supply is terminated. Standard testing protocol will be followed. (See above).

Standards for Deferral:

A deferral of all WAP services will be applied when an operable non-vented combustion appliance is installed in the dwelling.

Standards for Referral:

When a permanent heat source cannot be installed.

Training Provision:

Training shall be provided to Inspection staff on how to determine a non-vented combustion appliance, and proper air testing.

Client Education:

A Notice of Potential Hazard shall be issued with specific instructions detailing the appliance removal and sealing the fuel source.

Disposal Procedures:

Field Standards

Space Heaters, Vented Combustion

Concurrence or Alteration:

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding:

DOE funds are being used.

Beyond Scope of DOE WAP:

If the costs exceed the listed budgeted limit, deferring the project may be necessary. But alternate funding will be sought.

Standards for Remedy:

Standard testing (listed) protocol will be provided.

Standards for Deferral:

When the scope of work exceeds the budgeted amount.

Standards for Referral:

Referrals to alternate programs (USDA, HUD, MPSC) would be sought for additional funding to eliminate listed condition.

Training Provision:

Training shall be provided to Inspection staff on how to determine a non-vented combustion appliance, and proper air testing.

Client Education:

A Notice of Potential Hazard shall be issued when CO levels exceed 9ppm, and or the current heating appliance is not installed or operating safely.

Disposal Procedures:

Field Standards.

Spray Polyurethane Foam (SPF)

Concurrence or Alteration:

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding:

DOE Funds will be used.

Beyond Scope of DOE WAP:

N/A

Standards for Remedy:

If the area of the dwelling which the use of two part foam would be dangerous to the worker, or the occupants. the installation would then be prohibited. Example: Near an open flame.

Standards for Deferral:

A Notice of Potential Hazard would be issued.

Standards for Referral:

Referrals to alternate programs (USDA, HUD, MPSC) would be sought for additional funding to eliminate listed condition.

Training Provision:

DOE funds will be used for training by an approved DOE training center.

Client Education:

Client education shall be provided by the contractors & crews when foam installation is detailed in the scope of work.

Disposal Procedures:

Field Standards.

Ventilation

Concurrence or Alteration:

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding:

DOE funds are being used.

Beyond Scope of DOE WAP:

When the mechanical ventilation standards cannot be met, alternative ventilation sources will be implemented.

Standards for Remedy:

If a blower door test cannot be conducted, air sealing measures will be installed based upon a visual inspection. Partial weatherization would be appropriate. Example: Attic insulation and foundation insulation.

Standards for Deferral:

Ventilation will be deferred when SHPO or construction barriers prohibit ventilation installation.

Standards for Referral:

Referrals will be made only when the scope of work exceeds budget limits.

Training Provision:

Federally approved and accredited trainers will train auditors/inspectors on the ASHRAE 62.2 standards

Client Education:

Energy Auditors and QC Inspectors will discuss ventilation requirements and usage during on-site visits.

Disposal Procedures:

Field standards.

ASHRAE 62.2 Compliance:

DOE funds may be used for training to implement ASHRAE 62.2 ventilation standards.

Window and Door Replacement, Window Guards

Concurrence or Alteration:

Concur with WPN11-6 ☑ Alternative Guidance ☐	

Funding:

DOE funds are being used.

Beyond Scope of DOE WAP:

The job will be deferred until the issue can be resolved.

Standards for Remedy:

The H&S measure may be deferred and partial weatherization completed.

Standards for Deferral:

When installation of safety glass or window guards prohibit usage of original construction member.

Standards for Referral:

When the scope of work exceeds budget limits.

Training Provision:

Training is conducted during QC Inspector/Energy Auditor classes. OSHA instruction may be provided.

Client Education:

Energy Auditors and QC Inspectors will discuss window safety glass/guards requirements and usage during on-site visits.

Disposal Procedures:

Field Standards.

Other (copy and paste as needed)

Health and Safety Issue: Describe the health and safety category below. Methods for addressing additional energy related health and safety issues must be consistent with DOE guidance.

Clothes Dryer Duct venting to dwelling/building exterior.

Funding: State that DOE funds are being used or indicate that alternate funding sources will be used to address this particular health and safety category.

DOE funds are being used.

Beyond Scope of DOE WAP: Describe how the issue will be treated if beyond the scope of DOE WAP.

All DOE work shall be deferred.

Standards for Remedy: Describe the standards for remedy of the health and safety category, including testing protocols. Also include when partial weatherization would be appropriate. **Note:** Some health and safety categories, like combustion gases, require testing.

A visual inspection shall be conducted. Dryer exhaust shall be vented through components approved in Appendix A and outlined in the Standard Work Specifications.

Standards for Deferral: Describe when deferral should take place for the specific health and safety category.

Deferral of weatherization air sealing will be required when dryer venting cannot be completed.

Standards for Referral: Describe when referral should take place for the specific health and safety category. If possible, include associated referral agencies.

Referral to other housing programs when necessary.

Training Provision: Discuss how training will be provided for the specific health and safety category. **Note:** Some health and safety categories, like OSHA, require training.

Training is provided to weatherization workers by BCAEO, DOE approved training centers, and state licensing and regulatory departments.

Client Education: Discuss what specific steps will be taken to educate the client, if any, on the specific health and safety category if this is not explained elsewhere in the State Plan**.** **Note:** Some health and safety categories, like mold and moisture, require client education.

Auditors and Inspectors will discuss dryer venting requirements and usage during onsite visits.

Disposal Procedures: Provide disposal procedures or indicate where these procedures can be found in the Plan or Field Standards.

Field Standards.

REFERENCES

- DOE Weatherization Program Notices 02-6, 08-6 and 09-6
- Environmental Protection Agency (EPA) Final Rule, 40 CFR Part 745

PURPOSE

The Weatherization Program Notice 00-1, page 16, states:

"…all Low-Income Weatherization Assistance Program activities doing renovation work in pre-1978 housing are subject to the provisions of a federal regulation that requires them to give notification to the occupants of the housing about the potential hazards of lead paint and lead paint dust. "

"…under this regulation (EPA 40 CFR Part 745) local agencies who do not give proper notification could incur hefty fines if found doing renovation work in pre-1978 housing stock…"

POLICY

EPA regulations 40 CFR Part 745 must be followed for all weatherization work in pre-1978 housing that disturbs more than two square-feet of painted surface. Per the regulations, housing for the elderly or disabled, where children are not expected to reside, is exempt.

Prior to beginning weatherization work in any pre-1978 housing unit where more than two square-feet of painted surface may be disturbed, Grantees shall provide the owner of the unit with the approved EPA lead pamphlet, and:

- obtain written confirmation of receipt by the owner on form DHS-4285, Pre-Renovation Form Confirmation of Receipt of Lead Pamphlet or
- obtain a certificate of mailing at least seven days prior to the start of weatherization work.

In addition, if the owner does not occupy the dwelling unit, provide an adult occupant of each unit with the pamphlet and:

- DHS-4285 or
- certify in writing on form DHS-4285 that a pamphlet has been delivered to the dwelling and that you have been unsuccessful in obtaining a written confirmation from an adult occupant or
- obtain a certificate of mailing at least seven days prior to the start of work.

When the owner or occupant is signing the DHS-4285, it must include:

- owner or occupant's name,
- address of unit,
- signature of the owner or occupant as applicable, and
- the date of signature.

When Grantee has tried and is unable to deliver the pamphlet to an occupant, the DHS-4285 must include:

- address of unit,
- the date and method of delivery of the pamphlet,
- name of the person delivering the pamphlet,
- reason for lack of acknowledgement,
- the signature of the person delivering the pamphlet and
- the date of signature.

When mailing the pamphlet, Grantee must obtain a certificate of mailing from the post office.

The DHS-4285, Pre-Renovation Form Confirmation of Receipt of Lead Pamphlet, and certificate of mailing must be kept in the job file.

The EPA lead pamphlet, *Renovate Right. Important Lead Hazard Information for Families, Child Care Providers and Schools* may be obtained at the following link:

http://www.epa.gov/lead/pubs/renovaterightbrochure.pdf

You may make copies to distribute to homeowners and occupants (non-owner occupied) who live in pre-1978 housing.

REFERENCES

CFR 440.18; U. S. Department of Energy (DOE) Weatherization Program Notices 01-1, 02-6 and 09-1.

PURPOSE

States are reminded that all work must be covered by liability insurance. States should inform local agencies that sufficient liability coverage for DOE funded activities should be obtained. Liability insurance should be charged to the liability line item in the budget. It should be noted that the liability insurance line item was created to ensure that such costs would never have to be charged to the administrative cost category. (See preamble to Federal Register, Volume 45, Number 40, published February 27, 1980, page 13031).

POLICY

Each agency must review the language above to determine if they have adequate liability insurance for all work performed. Things to consider in making this decision are that we do not determine degree of lead content and we do not abate lead. The U. S. Department of Energy Weatherization Assistance Program work is excluded from the definition of new construction or rehabilitation as long as activities do not disturb painted surfaces that total more than:

- Six square feet of any interior space per room

  Note: total surface area includes the total of all disturbed surfaces.

Local Weatherization Operators(LWOs) are no longer required to have Pollution Occurrence Insurance (POI). DOE continues to strongly recommend POI. LWOs are strongly advised to either refer or defer weatherization work that will disturb surfaces that may contain lead-based paint, until they have insurance that provides coverage for Lead Safe Weatherization (LSW) work situations involving lead-based paint.

Also, local agencies that employ private contractors to perform weatherization services must ensure that each private contractor is adequately insured as well.

Liability insurance, including POI, must be charged to the Liability Insurance line item in the budget.

If a local agency chooses not to hold POI coverage and damage occurs because of not following all aspects of LSW, or there is a disturbance to any other environmental pollutants; the cost to do remediation, clean up, relocation, medical expenses or any other resulting costs may not be charged to the DOE contract and must be covered by another funding source.

REFERENCES Weatherization Program Notice 06-1

BACKGROUND: 5.14 ENERGY-RELATED MOLD AND MOISTURE IMPACTS:

The Weatherization Assistance Program is not a mold remediation program. The use of DOE funds for the removal of mold and other related biological substances is not an allowable weatherization expense. DOE funds should not be used to test, abate, remediate, purchase insurance, or alleviate existing mold conditions identified during the audit, the work performance period or the quality control inspection. If necessary, weatherization services may need to be delayed until the existing mold problem can be referred to another agency for funding of remedial action.

The inclusion of a mold protocol or checklist for local agencies does need to be a part of their routine audit inspection. If a mold condition is discovered during the initial inspection of the home by the energy auditor that cannot be adequately addressed by the weatherization crew/contractor, then the unit should be referred to the appropriate public or non-profit agency for remedial action.

Effective immediately, all States should ensure that their local agencies include some form of notification or disclaimer to the client upon the discovery of a mold condition and what specifically was done to the home that is expected to alleviate the condition and/or that the work performed should not promote new mold growth. This notification/disclaimer should be discussed with and signed by the client and/or landlord.

POLICY:

LWOs must use the Release of Liability and Waiver of Claims, DHS-552-A, to ensure clients are informed of the limited health and safety assessment that will be done on the unit as well as potential health and safety problems that may be identified in the process or may result during weatherization work. The Release will also include recommendations for individuals with certain health conditions. The client's signature authorizing weatherization work to proceed and releasing the LWO of liability must be obtained. A copy of this release must be in the client file of every completed unit.

REFERENCES

- State of Michigan Department Of Energy State Plan
- Department of Energy Weatherization Program Notice 15-4
- Retrofitting Michigan: Technical Weatherization Field Guide
- NREL Standard Work Specifications
- Community Services Policy Manual
- DOE Agreements
- National Renewable Energy Laboratories Job Task Analysis (JTAs)

PURPOSE

To ensure Grantee Technical Weatherization Staff have the qualifications and skills to meet the DOE identified, National Renewable Energy Laboratories (NREL) Job Task Analysis (JTA), for each position in which the weatherization worker is employed and to ensure compliance with Weatherization Program Notice 15-4 (WPN15-4).

POLICY

All Grantees are responsible for ensuring that all weatherization workers are familiar with the NREL JTAs for each position and performing work to meet the JTA standards and the Standard Work Specifications in order to ensure quality work on every weatherization project.

All training completions, dates, staff, and certifications for the Weatherization Assistance Program (WAP) are to be entered by each Grantee into FACSPro. Each Grantee is required to inform BCAEO of any agency contractor/staff that achieves any of the Home Energy Professional certifications. Local Weatherization Operators can inform BCAEO by emailing the DHS-Weatherization@michigan.gov mailbox and including the Agency name, Certified staff/contractor, type of certification, and date of certification.

Retention Agreement

The DOE recommends that a sponsoring agency secure a retention agreement with each sponsored candidate. An example of this agreement is included as **Attachment A**. Please note that this is a sample agreement and each Grantee may want to add or refine language. For example, a grantee may insert items in section 1.b. to further list the types of costs associated with training. The time frame of 12 months shown in section 3 is also just a guideline and can be adjusted to more accurately align the funds

spent on training with the retention period. A Grantee may want to have a retention agreement for any level of training.

DOE Identified Training Tier Descriptions

Tier 1 Training: Comprehensive, occupation-specific training which follows a curriculum aligned with the JTA for that occupation. Tier 1 training must be administered by, or in cooperation with, a training program that is accredited by a DOE-approved accreditation organization for the JTA being taught. .

Tier 2 Training: Single issue, short-term, training to address acute deficiencies in the field including dense packing, crawlspace, ASHRAE, etc. Conference trainings are usually included in this category. This training is offered by BCAEO staff and Weatherization partners.

Tier 1 Training/Certification Requirements for NREL JTAs

Quality Control Inspector: Each grantee shall require and ensure that the Quality Control Inspector, performing final inspections on WAP completions, has a Quality Control inspection certification from a DOE approved accredited organization.

Energy Auditor: Each grantee shall ensure that the Energy Auditor is performing work in compliance with the Energy Auditor JTA. Any formal training for Energy Auditor must be provided by a DOE approved accredited training organization. The grantee is not required to send the person to training but must have a method in place to ensure that they have the training to complete the job as outlined in the JTA. If the job is not being performed in compliance, the grantee must have a training plan in place to ensure compliance.

Crew Leader: Each grantee shall ensure that the Crew Leader is performing work in compliance with the Crew Leader JTA. Any formal training for Crew Leader must be provided by a DOE approved accredited training organization. The grantee is not required to send the person to training but must have a method in place to ensure that they have the training to complete the job as outlined in the JTA. If the job is not being performed in compliance, the grantee must have a training plan in place to ensure compliance.

Retrofit Installer: Each grantee shall ensure that the Retrofit Installer is performing work in compliance with the Retrofit Installer JTA. Any formal training for Retrofit Installer must be provided by a DOE approved accredited training organization. The grantee is not required to send the person to training but must have a method in place to ensure that they have the training to complete the job as outlined in the JTA. If the job is not

being performed in compliance, the grantee must have a training plan in place to ensure compliance.

Tier 2 Training/Certification Requirements for Weatherization workers

Blower Door Training
Each grantee shall have at least one certified Energy Auditor and one IREC Certified QC Inspector available who is trained and capable of properly completing blower door testing and related calculations.

Lead Safe Weatherization Training
Energy Auditors/QC Inspectors and agency crews/contractors shall receive specialized training and testing in LSW. LSW training will be offered on an as needed basis; new staff is required to attend training within 180 days of the date they are hired. Those who attend and pass this training will be authorized to inspect, supervise, and/or work on the dwellings. Individuals who have not attended one of these training sessions will not be permitted to inspect, supervise, and/or work on the homes to be weatherized unless they are accompanied by or in the presence of staff who have attended required training and passed a test for certification. Documentation relative to LSW certification shall be maintained at the agency.

Indoor Air Quality/Mold Training
Energy Auditors/QC Inspectors and agency crews/contractors shall receive specialized training in the recognition of conditions that promote mold growth they may encounter in their weatherization work and how best to prevent creating new mold conditions. New staff is required to attend training within 180 days of the date they are hired. Individuals who have not attended one of these training sessions will not be permitted to inspect, supervise, and/or work on the dwellings to be weatherized unless they are accompanied by or in the presence of staff who have attended the required training. Documentation relative to IAQ certification shall be maintained at the agency.

MIOSHA Training
Training shall be provided by Occupational Safety and Health Administration qualified instructor. The construction “10-hour Occupational Safety and Health training course” is required. All Energy Auditors/QC Inspectors and agency crews who have not attained certification will not be permitted to independently inspect, supervise, and/or work on the homes to be weatherized unless they are accompanied by or in the presence of staff who have attained the required certification. New staff (Energy Auditors/QC Inspectors and agency crews) is required to attend training within 180 days of the date they are hired. Documentation relative to certification shall be maintained at the agency. (NOTE: Weatherization Agency Crew Leaders may be required to attend additional training).

ASHRAE 62.2

Training is required and shall be provided by BCAEO or an accredited facility and a qualified instructor. All Energy Auditors/QC Inspectors who have not attained certification will not be permitted to independently inspect, supervise, and/or work on the homes to be weatherized unless they are accompanied by or in the presence of staff who have attained the required certification. New staff (Energy Auditors/QC Inspectors) are required to attend training within 180 days of the date they are hired. Documentation relative to certification shall be maintained at the agency.

Agency Documentation Requirements

- Documentation (e.g. copy of certificate) of DOE required LSW training for crew, staff, and subcontractors
- Documentation (e.g. copy of certificate) of Environmental Protection Agency (EPA) required Lead Renovator Repair Painting (LRRP) training for crew, staff, and subcontractors
- Documentation (e.g. copy of certificate) of EPA LRRP Firm status as required including expiration date
- Documentation (e.g. copy of certificate) of EPA LRRP Renovator status as required including expiration date
- Documentation of all IREC accredited training and certifications.

CSPM 618 - ATTACHMENT A

TRAINING AND TECHNICAL ASSISTANCE RETENTION AGREEMENT

THIS TRAINING AND TECHNICAL ASSISTANCE RETENTION AGREEMENT made this _____ day of _____, 200_, is by and between AGENCY NAME (hereinafter "ABC"), and _____ (hereinafter "Contractor"), for training and technical assistance (hereinafter "T&TA") towards the cost of the Weatherization Inspector Certification Course (hereinafter "Training Course") under the Michigan Weatherization Assistance Program (hereinafter "M-WAP").

WITNESS:

WHEREAS, Section 3.0 of DOE's Weatherization Program Notice 09-1B requires that contractors receiving DOE T&TA funds sign a retention agreement that they will provide weatherization services for a specific amount of time that aligns with the funds provided;

WHEREAS, Contractor desires to receive T&TA funds assistance for the Course;

NOW THEREFORE, in consideration of the premises and agreements of "ABC" and Contractor as hereinafter provided, the parties hereby mutually agree as follows:

1. "ABC" will provide DOE T&TA funds to cover the cost of Contractor's participation in the Training Course, limited to the following:

    a. Reasonable travel costs in accordance with DOE standards;
    b. [INSERT OTHER COSTS, IF APPLICABLE]

2. Contractor shall satisfactorily complete the Training Course and any examinations required thereto;

3. Contractor shall remain actively employed or actively participate in M-WAP weatherization inspections for a period of no less than twelve (12) months following completion of the Training Course.

4. If Contractor does not fulfill his or her obligations under this Agreement, Contractor will reimburse "ABC" the total T&TA funds drawn within thirty (30) calendar days of notice from "ABC". Said reimbursement amount shall become immediately due and payable as a debt and obligation of Contractor to "ABC". Repayment will be made in the full amount due as a lump sum. **If payment is not received by "ABC" within thirty (30) days, "ABC" may assess reasonable costs of collection, including but not limited to interest, court costs, and attorney's fees.**

5. **Contractor has read and understands the terms of this Agreement.**

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be executed the date and year first indicated.

CONTRACTOR:

_____ _____

Signature Date

Printed Name:

AGENCY NAME

_____ _____

Signature Date

Printed Name:

Title:

REFERENCES

- State of Michigan DOE State Plan
- Technical Weatherization Policy Manual (TWP)
- Retrofitting Michigan Field Guide
- Community Services Policy Manual
- Weatherization Program notice 15-4

PURPOSE

Weatherization Assistance Program (WAP) Energy Auditor/ Quality Control (QC) inspector training and testing requirements will be administered and/or monitored by the State of Michigan (SOM), Bureau of Community Action and Economic Opportunity (BCAEO).

POLICY

Quality Control Inspectors (QCI)
QCIs working for, or contracted by, the WAP must possess the knowledge, skills and abilities in the NREL Job Task Analysis for QCIs. This applies to all individuals who perform an evaluation and sign off on work performed in homes. The QCI has no involvement in the prior work on the home either as the auditor or as a member of the crew. All QCIs performing final inspections must have a IREC accredited Quality Control Inspector Certification.

Single Family:
QCI competency is demonstrated by certification as a Home Energy Professional Quality Control Inspector.
QCIs can be employed by third party organizations or subgrantees; however, the Grantee is ultimately responsible for ensuring that every completed unit reported meets the quality guidelines required by the Weatherization Assistance Program.
The Grantee must provide in their Grantee plan a policy for validation of the QCI credentials.
The Grantee must have policies and procedures in place to address situations where a QCI is not inspecting units using the standards adopted by the Grantee and consistent with the SWS. The policy must include monitoring of the QCI and procedure's for disciplinary action if the Grantee inspection protocols are not followed.

Multifamily:
Grantee training plans must include requirements to ensure that QCIs working in multifamily buildings attend, and receive a successful evaluation from a training

program delivering a curriculum based on the NREL Multifamily Quality Control Inspector JTA.

Energy Auditors

All Energy auditor candidates must be sponsored by one of the Grantee agencies in the Michigan WAP network. The sponsoring Grantee will be responsible for the field training necessary to prepare candidates sufficiently for other required training and testing. Grantee training should include agency specific paperwork and protocol used during the audit/inspection process. See the Grantee Training section below for required training elements.

Energy auditor candidates shall complete all required training sessions and must pass all required tests, prior to performing any WAP energy audits independently.

The Energy Auditor must possess the knowledge, skills and abilities in the National Renewable Energy Laboratory (NREL) Job Task Analysis for Energy Auditor. If an Energy Auditor has a Building Performance Institute (BPI) Building Analyst certification (or comparable certification) or Quality Control Inspector certification, testing with the BCAEO technical staff is not necessary. The Grantee must still require time in the field with a certified SOM energy auditor prior to allowing the Energy Auditor to perform audits for the WAP. Grantees are responsible for documenting field time and ensuring the Energy Auditor can perform all required tasks in compliance with the Standard Work Specifications, WAP policy, and state and federal policy. Field requirements are listed below.

If the Energy Auditor does not have these certifications, they must complete the required time in the field, testing/certification requirements and an over the shoulder test conducted by BCAEO technical staff will be required.

If a Grantee chooses to utilize an Energy Auditor that has not been certified by the SOM, but has comparable certifications, it is the Grantee responsibility to ensure the Energy Auditor can perform all tasks related to the WAP including WA8, FACSPro, IWC policy requirements, and ensuring performance and skills meet the requirements of the WAP.

QCI competency is demonstrated by certification as a Home Energy Professional Quality Control Inspector.

Training Components

Energy Auditor training and testing consists of five required components:

1. IREC Accredited Energy Auditor Training
2. Field Experience- a minimum of three months
3. Grantee Training
4. SOM Training & Testing
5. SOM Over-the-Shoulder Skills Assessment

BCAEO Staff Training

During the three-month training period, the sponsoring agency may contact the BCAEO at DHS-Weatherization@michigan.gov to request training in the following areas:

- FACSPro Weatherization Module orientation
- SOM DOE-approved audit(s)
- Audit Input/Output Reports

Field Experience

A minimum of three months of actual field experience is required for any energy auditor that does not have a SOM Energy Auditor/QCI certification. . Field experience is defined as the time actually spent accompanying a SOM certified Energy Auditor on DOE WAP audits conducted at the Grantee level and in the completion of all required WAP documents. It is an allowable DOE expense to pay said Energy auditor candidate a stipend for shadowing experienced, certified Energy auditors during this time.

The Energy Auditor candidate must participate in a minimum of ten audits. Five of the ten should be done as assistance to the certified Energy Auditor and for the other five, the Energy Auditor candidate should take the lead with the certified Energy Auditor assisting minimally.

If the grantee does not have a certified Energy Auditor on staff, the grantee should contact another network grantee to schedule the Energy auditor candidate to work with that agency's certified Energy auditor. If the grantee has a contracted certified Energy Auditor, a stipend may be paid to allow the Energy Auditor candidate to accompany the certified Energy Auditor.

Grantee Training

The sponsoring grantee is responsible for the following training for all Energy Auditor/QC Inspector candidates:

- Client Interview including:
  - Indoor Air Quality (IAQ) (DHS-552) information
  - Lead Notice
  - Client Plan of Action
  - Energy Education
- Recordkeeping
  - IWC
  - SHPO
  - DOE approved audit
  - Work Order
  - Change Order process
  - All appropriate notices
  - Client Assessment
  - Final Inspection Job Information
- Other
  - Completion of the IWC
  - The transfer of the IWC into FACSPro
  - The transfer from FACSPro into the DOE approved audit
  - Completion of the DOE approved audit
  - Generation of the SIR driven work order from the DOE approved audit

BCAEO Training & Testing

BCAEO technical staff training includes:

- ASHRAE 62.2
- LSW (Lead Safe Work Practices)
- IAQ (Indoor Air Quality)

This training is offered quarterly by BCAEO. LSW and IAQ both including testing.

Other required WAP training includes:

- LRRP (Lead Renovator and Repair) – information available at: www.michigan.gov/leadsafe or call (866) 691-5323 or http://www2.epa.gov/lead/renovation-repair-and-painting-program-training-providers

- OSHA/MIOSHA – information available at: http://www.michigan.gov/lara/0,4601,7-154-61256_11407---,00.html

SOM Energy Auditor Over-the-Shoulder Skills Assessment

Upon completion of the entire curriculum, testing and the three-month field experience, candidates shall request to take the Prerequisite test.

Contact the BCAEO DHS-Weatherization@michigan.gov to make those arrangements. This test will be administered by BCAEO staff.

Over-the-Shoulder Skills Assessment Protocol

Candidates will receive a notice with the date and time of the scheduled field observation. Scheduling will be determined by the workload of the BCAEO technical staff. Assessments will be scheduled quarterly at a minimum.

It is critical that candidates arrive at the test house at the time indicated to ensure enough time to complete the entire process. Candidates will have three (3) hours on-site to complete the audit and twenty-four (24) hours from the conclusion of the on-site audit to submit, via email, the complete audit documentation. Candidates will be provided a Candidate Field Test Observation Process form that will record the date and time all documentation must be submitted. If the candidate must travel a significant distance to reach the test house, a request to adjust the 24-hour period should be made to the DHHS BCAEO proctor prior to the test date. Candidates not submitting all required documentations within the prescribed timeframes will not achieve certification. The test areas on which candidates will be evaluated are included below.
The required documentation is listed on the Michigan Weatherization Assistance Program Energy Auditor Candidate Field Test and Score form provided to each candidate.

Equipment

All equipment necessary to complete the skills assessment must be provided by the sponsoring agency or the candidate.

Test House Criteria

Skills assessment requests are logged and scheduled by BCAEO staff as closely as possible in the order received. The sponsoring Grantee must secure a client house for the process. The test house criteria are included in **Attachment B**.

Note: If possible, agency staff should inspect the house prior to the test day to ensure there are no gas leaks. BCAEO staff has had numerous field observations delayed and/or ended due to gas leak problems.

Skills Assessment Scoring

The following criteria will constitute a passing Skills Assessment and result in certification:

- The Energy auditor candidate achieves an overall score of 70% or above, AND
- Satisfactorily completes the six critical skill items listed below on page 8 of this document.

During the Skills Assessment, the Energy Auditor candidate is observed and scored on the criteria listed below. The assessment tool is based upon the DOE standardized curricula with compliance to all State of Michigan and local code requirements. The candidate will be evaluated upon successfully completing the audit and submitting all required paperwork to the DHHS BCAEO proctor.

Once certified, the Energy Auditor can conduct independent audits and final inspections.

Test Areas
See CSPM 618.2 Job Task Analysis for Energy Auditor.

Timelines

Upon arrival at the test site, each candidate will receive the “Michigan WAP Energy Auditor Candidate Skills Assessment” form. The form will include the date and time of the candidate field test, the address, and the date/time that all required documentation must be submitted to the DHHS BCAEO proctor.

The candidate will have three (3) hours on site to complete his/her inspection and twenty-four (24) hours from the conclusion of the on-site inspection to submit all required inspection documentation.

Note: Requests for consideration of travel time to and from test site will be considered on a case by case situation. Please advise BCAEO staff of this request at the time of the observation process reservation.

Candidates must email all required inspection documents to the DHHS BCAEO proctor at the email address furnished at the assessment.

Required Documentation

The required documentation MUST include all of the following:

- Complete field audit document (IWC)
- Copy of all site produced notices
- NEAT wdz file of completed audit used for FACSPro Work Order
- Complete work orders that identify all NEAT required measures.
- To be considered complete, a work order must include all
    - SIR justified measures;
    - Incidental measures;
    - Health & safety measures
    - Miscellaneous measures
    - Optional measures

Evaluation/Recommendation

Satisfactory Audit – Michigan Energy Auditor
Additional Site Audit Needed (equipment failed or test aborted)
Unsatisfactory Audit – Failed (scored less than 70%)

An Energy Auditor candidate will pass the Energy Auditor skills assessment with a score of 70% or greater AND satisfactory completion of the six following critical skill Items.

Critical Skill Items

1. Performs all required health and safety tests in the DOE prescribed order.
2. Performs all audit activity in compliance with policy and Standard Work Specifications.
3. Accurately performs all ASHRAE 62.2 2013 calculations and fan flow measurements.
4. Completes the Blower Door test- including set-up and testing.
5. Satisfactorily completes the Combustion Appliance Zone (CAZ) testing.

6. Conducts all required Lead Safe Weatherization practices during the audit/inspection.
7. Prepares the work order and it is reflected correctly in the NEAT output report.

Note: Failure to satisfactorily perform any of Items 1-6 will result in a failed certification. The proctor shall identify the assessment as failed immediately upon determining that the candidate failed to perform one of the critical skill items. An Energy Auditor/QC Inspector candidate may at that time request training and technical assistance on the Energy Auditor/QC Inspector protocol.

The scoring criteria is included as part of the Field Test and Score Form document. See Attachment C.

Release of Test Results to Sponsoring Agency

The sponsoring agency can obtain scoring information from the BCAEO only if the Energy Auditor/QC Inspector candidate has signed a release form. An example of a release statement is included as Attachment D.

Re-Test

If the candidate fails the test, a request to re-test will only be approved after three months or if the candidate has demonstrated that he/she has obtained additional training and/or skill in the area(s) of deficiency.

SOM Certification Documentation

Those who qualify for certification by passing all required training and testing will be issued certification via an emailed notice from BCAEO technical staff. A copy of the Energy Auditor/QC inspector certification documentation must be maintained by the sponsoring grantee.

Energy Auditor Decertification/QC inspector Suspension

The BCAEO may revoke, modify, condition, refuse to renew, or temporarily suspend, the certification of an Energy auditor and temporarily suspend aQC inspector from conducting final inspections for the SOM Weatherization program if the Energy auditor/QC inspector does any one or more of the following:

1. Commits fraud or deceit with respect to any required license or permit application or an inspection report submitted to the Grantee or SOM;

2. Violates any state or federal law, rule, permit, or order relating to the inspection and/or installation of weatherization measures.

3. Makes a false or misleading statement in that portion of a written report that deals with professional qualification or in any testimony concerning professional qualifications;

4. Engages in an act or omission involving dishonesty, fraud, or misrepresentation with the intent to substantially benefit a home Energy auditor/QC inspector or other person or with the intent to substantially injure another person;

5. Engages in an act of fraud, misrepresentation, or deceit in the making of a home inspection;

6. Pays a finder's fee or a referral fee to a person in connection with an inspection of or work to be done on a residence;

7. Fails or refuses without good cause to exercise reasonable diligence in developing a home inspection report, preparing a report, or communicating a report;

8. Accepts a home inspection assignment when the employment itself is contingent upon the home Energy Auditor/QC Inspector reporting a predetermined estimate, analysis, or opinion or when the fee to be paid is contingent upon the opinion, the conclusions, analysis, or report reached or upon the consequences resulting from the assignment;

9. Performs work or improvement to a residence upon which the Energy Auditor/QC Inspector performed a home inspection within the previous 12 months;

10. Employs fraud, deceit, or misrepresentation in obtaining or attempting to obtain a license or renewal of a license including builder, mechanical, plumber, electrician, and maintenance and alteration licenses such as mobile home, insulator, window installer, etc.

11. Is responsible for citation of repeated (3 or more) findings in consecutive monitoring reports completed by either the grantee, DHS BCAEO or DOE;

12. Commits an act or acts of malpractice, gross negligence, or incompetence in the performance of home inspections;

13. Practices as a licensed home Energy auditor/QC inspector without a current SOM Energy Auditor/QC Inspector certification;

14. Engages in conduct that could result in harm or injury to the public during the course of an audit or inspection.

Notice

If the BCAEO revokes, modifies, conditions, refuses to renew, or suspends a certification, it shall inform the Energy Auditor/QC Inspector in writing of the reason for the action and shall include a copy of the appeals procedure. All appeals must be submitted in writing to the Director of Bureau of Community Action and Economic Opportunity, Michigan Department of Health & Human Services at:

Bureau of Community Action and Economic Opportunity
235 S. Grand Ave. Suite 204
PO Box 30037
Lansing, MI 48909

Energy Auditors/QC Inspectors have 20 business days from the date of notification to appeal the action.

Appeals Process

The Energy Auditor/QC Inspector may request a hearing before the Energy Auditor/QC Inspector Certification Appeals Panel. Panel members will be appointed within 10 work days of the receipt of the appeal request. The panel will consist of:

- One DHS Bureau staff, appointed by the BCAEO Director;
- Two Local Weatherization Operators, appointed by the Michigan Community Action Agency Association (MCAAA) Weatherization Committee Chair;
- One CAA Executive Director, appointed by the Michigan Community Action Agency Association (MCAAA) Executive Director, and
- One member of the Commission on Community Action and Economic Opportunity; appointed by the Commission Chair.

A formal hearing will be conducted within 30 business days of the receipt of the appeal request. The panel will inform the appeals applicant in writing of its decision.

Panel Review Process

The review process will include the following elements:

Convening of the panel

- Panel members will select a panel spokesperson. Panel will review any written documents submitted to date.

Presentation

- BCAEO staff will present a summary regarding reason(s) for the recommended action. This summary may be presented to the panel in writing, in person, or via electronic communication.
- Appellant will be given an opportunity to present a summary regarding reason(s) that BCAEO decision is not appropriate and supporting documentation as applicable. This summary may be presented to the panel in writing, in person, or via electronic communication.
- Panel members will communicate any points of clarification needed with the parties.

Deliberation and Decision

- The panel will review summary presentations, documentation and clarifications provided and render a decision.
- A decision based on simple majority will prevail.
- The panel spokesperson will communicate the panel's decision to the appellant and the BCAEO Director in writing.

Decertification Period

Revocation of an Energy Auditor or suspension of QC Inspector's performing audits for the MI WAP program shall be for a minimum of 6 months from the date of notice of decertification, suspension, or of the appeals panel notice, whichever is later.

Decertified Energy Auditor or suspended QC Inspectors may request renewal of certification at the end of the decertification period. The decertified Energy Auditor/QC Inspector must have a network grantee agency sponsor this request. The decertified Energy Auditor or suspended QC Inspector must attend IREC accredited Energy Auditor or QC Inspector training

In the event of a QC Inspector suspension, a letter outlining the suspension will be provided to Michigan Weatherization Policy Advisory Council, Department of Energy and Michigan Community Action.

This outline of Energy Auditor (pre-inspector) skills is to illustrate the skills needed for State of Michigan (SOM) certification test. The testing is based on Department of Energy (DOE) guidelines and the Community Services Policy Manual (CSPM).

Energy Auditors (EA) working for, or contracted by, the WAP must possess the knowledge, skills and abilities in the National Renewable Energy Laboratory (NREL) Job Task Analysis (JTA) for Energy Auditor. This applies to all individuals who perform the original audit and confirm that the measures called for on the work order are appropriate and in accordance with the SOM audit procedures and protocols approved by DOE. (CSPM 618.2)

The complete EA NREL JTA is available at:
http://energy.gov/eere/wipo/downloads/nrel-job-task-analysis-energy-auditor

CSPM 618.1 (excerpt):

An Energy Auditor candidate will pass the Energy Auditor skills assessment with a score of 70% or greater AND satisfactory completion of the seven following critical skill Items.

Critical Skill Items

1. Performs all required health and safety tests in the DOE prescribed order.
2. Performs all audit activity in compliance with policy and Standard Work Specifications.
3. Accurately performs all ASHRAE 62.2 2013 (or most recent) calculations and fan flow measurements.
4. Completes the Blower Door test- including set-up and testing.
5. Satisfactorily completes the Combustion Appliance Zone (CAZ) testing
6. Conducts all required Lead Safe Weatherization practices during the audit/inspection.
7. Prepares the work order and it is reflected correctly in the NEAT output report.

Four (4) of the field exam line items are gated items and must be completed successfully in order to pass the exam regardless of any other exam score. Those items include:

- Monitor the ambient CO tests throughout the building
- Record the highest ambient CO reading
- Source the CO
- Candidate set combustion appliances to pilot or disabled them

The following items are used in scoring candidates. Each bullet is counted as one (1) point. Candidate's score is calculated by dividing the score received by the number of possible bullet points (151). The field test home may not include all conditions outlined below. The successful candidate should discuss with the proctor **all** of the conditions outlined.

A. Demonstrating Professional Energy Auditor Conduct (field)

1. Establish client relations for an energy audit
   - Conduct client introductions
   - Conduct client interviews
2. Represent the program/agency/organization
   - Obtain client signatures on forms (lead forms, etc.)
   - Explain the purposes of the visit
   - Establish the client plan of action
   - Sell the client Weatherization program, services and/or packages
3. Maintain professionalism
   - Ability to work independently, verbalize why
   - Set the client expectations and responsibilities (pre and post audit)

B. Collecting Information about the Building for an Energy Audit (field)

1. Document energy consumption
   - Explain seasonal calculations (Baseload Vs Seasonal)
2. Document the building history
   - Note remodeling, additions
   - Note upgrades to structure (e.g. new windows, doors, roof, etc.)
   - Determine the age of the original structure
   - Determine if the building has any historical significance
3. Conduct a physical/visual inspection
   - Walk around exterior making observations/notes/pictures
   - Walk around interior making observations/notes/pictures
   - Determine the exterior façade materials (siding, brick, etc.)
   - Identify issues that would interfere with or prevent tests
   - Identify hazardous materials in the building
   - Detect unusual odors
   - Identify health and safety issues (clutter, bleach stored next to a furnace, etc.) Perform visual inspection of vented combustion appliance venting configuration
   - Visually inspect adjacent and/or connected buildings for issues that impact or could be impacted by the audited building
4. Collect appliance information
   - Refrigerator manufacturer's tag data
   - Furnace tag data
   - Water heater tag data

5. Collect electrical base load data
    - Identify incandescent light bulbs
    - Identify domestic water heater data (e.g. electric, gas)
    - Watt hour metering of refrigerator
6. Collect building measurements
    - Measure walls
    - Measure roofs
    - Measure windows
    - Measure doors
    - Measure perimeter
    - Measure foundation height
    - Measure attic spaces
    - Measure area and volume of the building envelope
7. Collect health and safety data
    - Smoke alarm existing condition and need
    - CO alarm existing condition and need
    - Clothes dryer vent condition and need
    - Verify all exhaust fans are properly vented to exterior
    - Identify wiring type (e.g. knob and tube wiring, romex)
    - IAQ 552 form data collection
    - Identify electrical hazards (frayed wiring, open junction boxes, unkempt wires, overloaded circuits, etc.)
    - Identify suspect asbestos
    - Identify lead based paint hazards
    - Identify unvented combustion appliances
8. Collect mechanical ventilation data
    - Measure fan flow rate(s) of existing
    - Collect and document ASHRAE 62.2-2013 compliance needs
9. Identify building insulation (attic, walls and foundations)
    - Type of existing insulation
    - Condition of insulation
    - Voids in insulation
10. Collect attic data
    - Document all data required for WA 8.6 input
    - Document/photograph attic problems (e.g. moisture, frost, venting, rotting, etc.)
    - Identify insulation type

- Identify insulation amount (thickness, etc.)
- Identify insulation condition
- Identify presence and placement of vapor retarder
- Identify location of insulation (exposure, aligned with pressure plane and thermal boundary, etc.)
- Identify existence of baffles, proper installation
- Identify areas of insulation opportunities
- Detail any preparations needed before insulation installation
- Document access condition
- Document heat sources and need for damming

11. Collect wall data
    - Document all data required for WA 8.6 input
    - Document/photograph wall problems
    - Measure wall areas
    - Identify infiltration points
12. Collect window data
    - Document all data required for WA 8.6 input
    - Document/photograph window problems
    - Measure window area
    - Count number of windows
13. Collect door data
    - Document all data required for WA 8.6 input
    - Document/photograph door problems
    - Identify condition of door sweep and weather stripping
    - Identify door hardware condition
14. Collect foundation data
    - Document all data required for WA 8.6 input
    - Document/photograph foundation problems
    - Measure floor areas
    - Identify infiltration points
    - Determine structural integrity
    - Measure the crawlspace ventilation
15. Collect roof data
    - Document all data required for WA 8.6 input
    - Document/photograph roof problems
    - Identify roof ventilation (passive vents)

C. Testing the Building for an Energy Audit (field)

1. Preparing for the test(s)
    - Determine the test(s) to be performed
    - Inform the client of the test(s)
    - Gather the test tools/equipment
2. Evaluate the appliances
    - Inspect appliances for test accessibility
    - Document findings with pictures/forms
    - Read and interpret a watt hour meter
3. Conduct indoor air quality tests
    - Monitor the ambient CO tests throughout the building (Gated)
    - Record the highest ambient CO reading (Gated)
    - Source the CO (Gated)
    - Determine if the reading exceeds any applicable action levels
    - Identify conditions that promote mold growth (high humidity, cold surface condensation, etc.)
    - Follow odors to find source of mildew
    - Visually identify presence of mold-like substance
    - Measure the flow of mechanical ventilation
    - Document findings with pictures/forms
    - Communicate results with clients
4. Perform combustion safety and efficiency tests
    - Visually inspect the fuel supply lines
    - Test for leakage in the fuel supply pipes
    - Verify leaks with bubble solution
    - Perform combustion spillage tests
    - Perform combustion appliance safety inspection to BPI 1200 standards
    - Document findings with pictures/forms
5. Perform blower door tests
    - Complete blower door test – including set-up
    - Candidate set combustion appliances to pilot or disabled them (Gated)
    - Perform zone pressure diagnostics (ZPDs)
    - Locate points of infiltration/exfiltration

- Document findings with pictures/forms
- Interpret blower door results
- Properly return home to pre-test conditions

6. Perform HVAC distribution tests
    - Document findings with pictures/forms

D. Evaluating Collected Energy Audit Data and Completion of SIR Driven Work Order (office)

1. Evaluate the health and safety of the building
    - WA 8.6 data correctly entered
    - WA 8.6 data correctly interpreted
    - Provide proper FACSPRO documentation
2. Evaluate the durability/structural integrity of the building
    - WA 8.6 data correctly entered
    - WA 8.6 data correctly interpreted
    - Provide proper FACSPRO documentation
3. Evaluate the HVAC system
    - WA 8.6 data correctly entered
    - WA 8.6 data correctly interpreted
    - Provide proper FACSPRO documentation
4. Evaluate the mechanical ventilation
    - WA 8.6 data correctly entered
    - WA 8.6 data correctly interpreted
    - Provide proper FACSPRO documentation
    - Proper IWC data entry and interpretation
5. Evaluate energy use base loads
    - WA 8.6 data correctly entered
    - WA 8.6 data correctly interpreted
    - Provide proper FACSPRO documentation
6. Evaluate the foundation
    - WA 8.6 data correctly entered
    - WA 8.6 data correctly interpreted
    - Provide proper FACSPRO documentation
7. Evaluate the walls
    - WA 8.6 data correctly entered
    - WA 8.6 data correctly interpreted
    - Provide proper FACSPRO documentation

8. Evaluate the attic
    - WA 8.6 data correctly entered
    - WA 8.6 data correctly interpreted
    - Provide proper FACSPRO documentation
9. Evaluate the doors
    - WA 8.6 data correctly entered
    - WA 8.6 data correctly interpreted
    - Provide proper FACSPRO documentation

10. Evaluate the windows
    - WA 8.6 data correctly entered
    - WA 8.6 data correctly interpreted
    - Provide proper FACSPRO documentation
11. Enter the data into energy modeling software
    - WA 8.6 data correctly entered
    - WA 8.6 data correctly interpreted
    - Provide proper FACSPRO documentation
12. Determine the work scope
    - WA 8.6 data correctly entered
    - WA 8.6 data correctly interpreted
    - Generate a work order in FACSPRO IWC

REFERENCES

- State of Michigan DOE State Plan
- Technical Weatherization Policy Manual (TWP)
- Retrofitting Michigan Field Guide
- Community Services Policy Manual
- Weatherization Program notice 15-4
- Standard Work Specifications for Home Energy Upgrades for Single Family, Manufactured Housing, and Multifamily homes
- IREC ISO 17024 Accreditation Program for Energy Efficiency Training Programs
- National Renewable Energy Laboratory Job Task Analysis
- U.S. Department of Energy WAP Training and Technical Assistance Clearing House

PURPOSE

The backbone of the accreditation process is the Job Task Analyses (JTAs). The JTAs for Single-Family Home Energy Upgrades reflect the four most common job classifications in the U.S. Department of Energy's Weatherization Assistance Program (WAP) and home energy upgrade industry, cataloguing the knowledge, skills, and abilities that a practitioner needs in order to perform a given job effectively and safely. The Single-Family JTAs are used by training providers to develop coursework that can be verified and accredited by a third-party organization. By being able to verify and accredit training programs based on these JTAs, a higher level of consistency and quality is now available within the industry.
A Job Task Analysis is a foundation for any valid credentialing program and helps identify the core knowledge areas, critical work functions, and/or skills typically found across a representative sampling of current practitioners or job incumbent workers. Empirical results from a job analysis provide examinees and the public with a valid, reliable, fair, and realistic assessment that reflects the skills, knowledge, and abilities required to competently perform a job.

POLICY

Quality Control Inspector (QCI)

A Quality Control Inspector is an evaluator who verifies the work performed against the work plan, specifications and standards, performs building diagnostics, records/reports findings and concerns, and specifies corrective actions; by conducting a methodological audit/inspection of the building, performing safety and diagnostic tests, and by observing the retrofit work; in order to ensure the completion, appropriateness and quality of the work providing for the safety, comfort, and energy

savings of the building occupants.

Domains/Tasks
Domain 1: Conducting Quality Checks - In-Process Visual/Sensory Inspections
Task 1: Verify worker compliance with safety rules
Task 2: Assure worker professionalism
Task 3: Address work problems
Task 4: Evaluate client satisfaction regarding the in-process work

Domain II: Conducting Quality Checks - Post-Work Visual/Sensory Inspection
Task 1: Review client file and the work scope
Task 2: Perform an exterior and interior visual/sensory inspection
Task 3: Evaluate client satisfaction
Task 4: Determine pass/fail of the work

Domain III: Conducting Quality Checks - Post-Work Diagnostic Inspections
Task 1: Conduct health and safety tests
Task 2: Conduct diagnostic tests
Task 3: Identify work problems

Domain IV: Ensuring Worker Professionalism
Task 1: Perform spot checks
Task 2: Provide feedback regarding professionalism

Domain V: Ensuring Program or Project Compliance
Task 1: Maintain professional credentials
Task 2: Confirm the allocation of public/private funds
Task 3: Evaluate installed measures against the field guide, SWS and state/local codes
Task 4: Close out the project
Task 5: Maintain files and records

Detailed Job Task Analysis for Quality Control Inspection can be found at the U.S. Department of Energy website:
http://energy.gov/sites/prod/files/2014/01/f7/51670.pdf

Multifamily Quality Control Inspector
The multifamily quality control inspector is a building performance specialist who inspects installed energy conservation measures in multifamily buildings by observing and measuring building systems and components and analyzing building performance data to verify that project requirements are met.

Multifamily Quality Control Inspector Duty Areas

- Reviewing Project Documents
- Developing Quality Control Plan
- Conducting Pre-Installation Site Visits
- Conducting Site Visits
- Reporting Quality Control Inspection Observations and Findings

Detailed Job Task Analysis for Multifamily Quality Control Inspector can be found on the U.S. Department of Energy website: http://www.nrel.gov/docs/fy14osti/60537.pdf

Energy Auditors (Single Family)
An Energy Auditor is a building scientist who evaluates the energy efficiency and health & safety of a building and identifies areas for savings by gathering empirical data, conducting tests and using energy modeling software, in order to reduce the energy consumption, improve the safety, and increase the lifespan of a building; while improving the quality of life and comfort for building occupants.

Domains/Tasks
Domain 1: Demonstrating Professional Energy Auditor Conduct
Task 1: Establish client relations for an energy audit
Task 2: Represent the program/agency/organization
Task 3: Maintain professionalism

Domain II: Collecting information about the Building for an Energy Audit
Task 1: Document energy consumption
Task 2: Document the building history
Task 3: Conduct a physical/visual inspection
Task 4: Collect appliance information
Task 5: Collect electrical base load data
Task 6: Collect building measurements
Task 7: Collect health and safety data
Task 8: Collect mechanical ventilation data
Task 9: Identify building insulation (attic, walls and foundations)
Task 10: Collect attic data
Task 11: Collect wall data
Task 12: Collect window data
Task 13: Collect door data
Task 14: Collect foundation data
Task 15: Collect roof data

Domain III: Testing the Building For an Energy Audit
Task 1: Preparing for the test(s)
Task 2: Evaluate the appliances
Task 3: Conduct indoor air quality tests
Task 4: Perform combustion safety and efficiency tests
Task 5: Perform blower door tests
Task 6: Perform HVAC distribution tests

Domain IV: Evaluating Collected Energy Audit Data
Task 1: Evaluate the health and safety of the building
Task 2: Evaluate the durability/structural integrity of the building
Task 3: Evaluate the HVAC system
Task 4: Evaluate the mechanical ventilation
Task 5: Evaluate energy use base loads
Task 6: Evaluate the foundation
Task 7: Evaluate the walls
Task 8: Evaluate the attic
Task 9: Evaluate the doors
Task 10: Evaluate the windows
Task 11: Enter the data into energy modeling software
Task 12: Determine the work scope

Detailed Job Task Analysis for Single Family Energy Auditor can be found on the U.S. Department of Energy website: http://energy.gov/sites/prod/files/2014/01/f7/51672.pdf

Multifamily Energy Auditor
The multifamily energy auditor is a building science and energy efficiency specialist who assesses multifamily building systems, and collects and analyzes energy use and building performance data, to develop a plan for reducing operating costs, and enhancing building performance while increasing occupant quality of life.

Multifamily Energy Auditor Duty Areas

- Determining Scope of Energy Assessment
- Preparing for Site Visit
- Assessing Heating and Cooling System
- Assessing Building Enclosure
- Evaluating Lighting Conditions
- Assessing Indoor Air Quality and Ventilation System
- Assessing Additional Loads and Sources
- Assessing Domestic Hot Water Systems
- Developing an Energy Performance Plan

- Performing Post-Audit Activities

Detailed Job Task Analysis for Multifamily Energy Auditor can be found on the U.S. Department of Energy website: http://www.nrel.gov/docs/fy14osti/60447.pdf

Crew Leader (Single Family)
A Crew Leader is responsible for supervising the retrofitting activities specified in the scope of work. He or she is responsible for interacting with the client plus managing personnel and materials on the job site in a safe and effective manner. The Crew Leader is responsible for quality control, testing procedures, documentation, and conducting a final walk through to ensure that all work is completed in a satisfactory manner.

Domains/Tasks
Domain 1: Develop and/or Review the Work Order
Task 1: Identify and disperse necessary paperwork, (e.g. permits, releases, lead-based paint EPA requirements, historic preservation, etc.)
Task 2: Read, evaluate and discuss with relevant others (auditor, coordinator, program manager, etc.) both audit and homeowner concerns
Task 3: Develop strategy for corrective actions necessary to achieve goals
Task 4: Develop production schedule for crews and subs

Domain II: Identify materials and staffing needs
Task 1: Identify skill sets of individuals necessary for job (i.e. crew and contractors)
Task 2: Identify total hours and number of individuals necessary to safely complete the job
Task 3: Identify, obtain and maintain tools, equipment and materials necessary to complete job
Task 4: Identify Personal Protective Equipment (PPE) necessary for job

Domain III: Develop plan to execute work order on site
Task 1: Establish rapport and expectations with homeowner
Task 2: Conduct interior and exterior visual home inspection review with crew in order to confirm with client the completion of any prerequisite work
Task 3: Conduct interior and exterior visual home inspection review with crew in order to perform initial job site safety inspection
Task 4: Conduct interior and exterior visual home inspection review with crew in order to develop site-specific safety plan to address any unsafe conditions and possible hazards and inform crew
Task 5: Conduct interior and exterior visual home inspection review with crew in order to document pre-existing conditions (e.g. cracked window, cracked ceiling and walls)

Task 6 Conduct interior and exterior visual home inspection review with crew in order to ensure work areas are accessible and scoped properly
Task 7: Conduct interior and exterior visual home inspection review with crew in order to identify need for job change orders
Task 8: Conduct interior and exterior visual home inspection review with crew in order to adjust work schedule as needed
Task 9: Conduct informative walk through with homeowner to explain what crew will be doing and answer questions and concerns
Task 10: Conduct informative walk through with homeowner to verify specific homeowner issues (allergies, valuable items, etc.)
Task 11: Conduct informative walk through with homeowner to obtain all necessary signoffs before work begins

Domain IV: Prepare house to execute work order
Task 1: Protect interior/exterior of house (e.g. with drop cloths, poly, Tyvek booties, pressurization)
Task 2: Set up proper containment, if necessary
Task 3: Test in (e.g. blower door, room to room pressure tests, IR scans, combustion appliances)
Task 4: Revise work order if necessary to reflect current conditions

Domain V: Execute work order and manage project
Task 1: Monitor safety practices for employees, contractors and job site
Task 2: Communicate with and support crew to ensure job efficiency (e.g. unforeseen circumstances, materials and tools not originally specified)
Task 3: Document work progression and work order changes with photos and notes
Task 4: Maintain quality control
Task 5: Clean up containment zones as necessary
Task 6: Communicate with homeowner as necessary
Task 7: Monitor use of resources (e.g. materials, manpower)
Task 8: Verify that installers track and document material usage
Task 9: Actively mentor crew (e.g. safety, work practices, professionalism)
Task 10: Monitor contractor for job site compliance
Task 11: Conduct daily final walk through to verify that all components of that day's work scope have been completed and cleaned up appropriately

Domain VI: Job finalization activities
Task 1: Walk through to verify that all components of the work scope have been completed
Task 2: Test out (e.g. blower door, IR scans, worst-case draft, combustion testing)
Task 3: Complete clean up
Task 4: Final walk through with homeowner/responsible party

Domain VII: Final Documentation
Task 1: Obtain homeowner/ responsible party job-completion sign-off signature
Task 2: Complete all final job documentation (e.g. materials, man hours, photos, time sheets, certified renovator signatures, information for inspectors)

Detailed Job Task Analysis for Crew Leader can be found on the U.S. Department of Energy website at:
http://energy.gov/sites/prod/files/2014/01/f7/51673.pdf

Multifamily Building Operator
A multifamily building operator efficiently operates and maintains building systems, addresses tenant concerns, improves building performance, and complies with regulations to support a comfortable, healthy, and safe living environment.

Multifamily Building Operator Duty Areas

- Facilitating Stakeholder Communication
- Monitoring Current Building Performance
- Operating and Maintaining Building Systems
- Ensuring Regulatory Compliance
- Improving Health and Safety
- Improving Building Performance

Detailed Job Task Analysis for Multifamily Building Operator can be found on the U.S. Department of Energy website: http://www.nrel.gov/docs/fy14osti/60536.pdf

Retrofit Installer (Single Family)
A Retrofit Installer/Technician installs energy-efficiency measures to single family or 2-4 unit-homes using a variety of building science best practices to improve, safety, comfort, durability, indoor air quality, and energy efficiency.

Domains/Tasks
Domain I: Maintain safety
Task 1: Follow work rules of jurisdiction having authority
Task 2: Handle materials/equipment according to manufacturer specifications
Task 3: Handle tools according to manufacturer specifications

Domain II: Prepare for the job (before arriving at job site)
Task 1: Attend training

Task 2: Gather materials and supplies
Task 3: Gather tools

Domain III: Prepare and maintain tools and materials on-site
Task 1: Set up tools
Task 2: Set up materials

Domain IV: Prepare and maintain job site
Task 1: Attend job site safety meeting
Task 2: Implement safety protocol (rigging, ventilation, blocking)
Task 3: Use protective barriers (drop cloths)
Task 4: Report preexisting conditions (that are not in scope)
Task 5: Protect exterior environment

Domain V: Implement work scope
Task 1: Locate specific work areas
Task 2: Verify access to work areas
Task 3a: Install air sealing measures
Task 3b: Install loose fill insulation
Task 3c: Install or patch moisture barriers
Task 3d: Rough in mechanical ventilation systems
Task 3e: Identify mechanical systems
Task 3f: Identify combustion appliance safety hazards
Task 3g: Install dense pack insulation
Task 3h: Install windows and doors
Task 3i: Identify electrical installation needs (rough-in, fans)
Task 3j: Identify plumbing installation needs
Task 3k: Identify/install roofing and flashing installation needs
Task 4: Clean as you go (organize)
Task 5: Address deviations from work scope

Domain VI: Wrap up
Task 1: Pick up tools and materials
Task 2: Clean up and close out
Task 3: Participate in crew debriefing (after action review, post construction job review)

Detailed Job Task Analysis can found on the U.S. Department of Energy website:
http://energy.gov/sites/prod/files/2014/01/f7/retrofit_installer_jta_04112012.pdf

Multifamily Retrofit Project Manager
Multifamily retrofit project managers direct and assure the successful completion of the building performance assessment, work scope development, and installation of conservation measures to reduce operating costs and achieve energy savings while ensuring the health and environmental safety of the building occupants.

Multifamily Retrofit Project Manager Duty Areas

- Assessing Project Viability
- Overseeing Building Performance Assessment
- Negotiating Statement of Work
- Procuring Installation
- Monitoring Construction
- Confirming Project Completion

Detailed Job Task Analysis for the multifamily Retrofit Project Manager can be found on the U.S. Department of Energy website: http://www.nrel.gov/docs/fy14osti/60446.pdf

REFERENCES

- National Historic Preservation Act (16 USC 470F)
- 36 CFR Part 800.14
- 36 CFR Part 800 (Section 106)

PURPOSE

On August 28, 2009, the United States Department of Energy (DOE) sent a Memorandum to all state and tribal historic preservation offices to formalize the role of recipients of grant awards ("EERE Applicants") under the DOE under the Energy Efficiency and Conservation Block Grant (EECBG) program, the State Energy Program (SEP") and Weatherization Assistance Program (WAP) in the Section 106 process.

This item serves to establish policy and procedures for administering WAP funded by DOE and in compliance with the parties' respective responsibilities under Section 106..

Section 106 of the National Historic Preservation Act (NHPA) applies to DOE funded activities. Grantees shall avoid taking any action that results in an adverse effect to historic properties pending compliance with Section 106.

The DOE Contracting Officer will consider the Grantee in compliance with Section 106 of the NHPA only after the Grantee has submitted adequate background documentation to the State Historic Preservation Office (SHPO) for its review. The SHPO has to provide written concurrence to the Grantee that it does not object to its Section 106 finding or determination. The Grantee shall provide a copy of this concurrence to the DOE Contracting Officer.

POLICY

The following process shall be used to determine whether a SHPO review is mandatory, and if so, how to request Section 106 reviews for projects funded under the WAP program.

Required Section 106 SHPO Review

Section 106 reviews must be considered for any weatherization work on:

- Units 50 years of age or older at the time the work takes place;
- Units that are historic properties;
- Units that are in a designated historic area.

For units meeting any of the above criteria, the Grantee must refer to the Exemption Guide in Attachment A to determine whether a SHPO review is required. Use the DOE WAP Historic Preservation Checklist to document the review of each unit.

For any unit that meets the criteria listed in the “Required Section 106” above, review the list to determine whether measures to be installed fall under the general exemptions or meet the conditions for exterior or interior exemptions. If so, **no SHPO consultation is required** and the Grantee may proceed with weatherization work on that unit.

Exemption Guide

The Programmatic Agreement includes an Exemption Guide (Attachment A) with guidance in working with SHPO. This guide includes:

- A list of general exemptions for activities that do not require consultation with the SHPO.
- A list of exterior work that does not require consultation if certain described conditions are met.
- A list of interior work that does not require consultation if certain described conditions are met.
- A list of activities that always require SHPO consultation.

For any unit that meets the criteria above, review the list to determine whether measures to be installed fall under the general exemptions or meet the conditions for exterior or interior exemptions. If so, **no SHPO consultation is required** and the Grantee may proceed with weatherization work on that unit.

Initiating a SHPO Review

For all other situations, the Grantee shall provide information regarding the property to SHPO to initiate a review. Reviews may be requested electronically or by mail.

Note: The Section 106 SHPO review process must be completed prior to the start of weatherization activities.

Electronic Submission

Electronic submission of the SHPO review request is initiated at the following website:

http://housing.state.mi.us/weatherization/

The Grantee enters the property address, identifies the appropriate building materials and uploads a photograph of the property. After all of the required information has been entered, the Grantee can submit the request electronically to the SHPO database. The Grantee can log into the database at any time to track the status of all review requests that have been submitted by the Grantee.

Mail Submission

If the Grantee does not submit the review requests electronically, the following must be sent to SHPO:

- The completed *State Historic Preservation Office of Michigan Housing Rehabilitation Inventory Card*
- GPS MAP
- Photograph

- Completed identification information section of the *State Historic Preservation Office of Michigan Historic Significance Response Sheet*

To obtain the *State Historic Preservation Office of Michigan Housing Rehabilitation Inventory Card* or the *State Historic Preservation Office of Michigan Historic Significance Response Sheet,* contact the State Historic Preservation Office at the address or phone number below.

Submit all review documents to the following address:

attn: DOE Weatherization Assistance Program
State Historic Preservation Office
Michigan State Housing Development Authority
702 W. Kalamazoo Street
PO Box 30740
Lansing, MI 48909-8240

Phone: 517-373-1630
email: ER@michigan.gov

Neighborhood Reviews

Grantees may submit requests for the review of entire neighborhoods to be considered excluded from the historic preservation review. This type of request must include the following information:

- Description of the neighborhood including all borders
- Dates of construction of sample houses
- MAP of neighborhood
- Digital photos of neighborhood houses (5-6 houses)
- Digital photos of streetscapes
- Cover letter indicating planned activities

Submit these requests for review to the address listed above and indicate this is a NEIGHBORHOOD REVIEW REQUEST.

If all materials are submitted, response time can vary. Response time is usually less for electronic submissions. Keep a copy of the response in the client file.

Client File Documentation

For any unit that meets the criteria listed in the Required Section 106 SHPO review, a DOE WAP Historic Preservation Checklist must be completed and retained in the client file.

For any unit that requires a Section 106 SHPO review, the completed *State Historic Preservation Office of Michigan Historic Significance Response Sheet* must also be retained in the client file.

Monitoring

Grantees may be monitored by the SHPO for compliance with this guidance. Agencies should therefore retain adequate records of compliance for all projects subject to this guidance, including before and after photographs of buildings/work subject to these exemptions as well as detailed specifications of the work conducted.

Michigan SHPO WAP Exemption Guide

This Guidance is provided by the Michigan SHPO to aid weatherization professionals in their consultation with our office. This Guidance is based on an Interagency Agreement developed between the SHPO, Michigan State Housing Development Authority, the Department of Energy, Labor and Economic Growth, and the Department of Human Services.

Consultation with the SHPO is **not required** for structures that are less than fifty years of age because these are unlikely to be considered historic properties (based on the criteria of the *National Register of Historic Places*).

If the SHPO determines that a property is not listed in or eligible for listing in the *National Register of Historic Places*, even if it is fifty years old or older, then the following exemptions do not apply and no further SHPO review is required.

The following work items are exempted from SHPO review. These exemptions assume the work is being done on a historic property. Work on historic properties must be done in accordance with the Secretary of the Interior's (SOI) *Standards for the Treatment of Historic Properties*, applicable SOI *Guidelines*, and *Preservation Briefs*. The *Standards* are reflected in the work specifications. All work must be done in accordance with any applicable specifications or it is not exempted. Work items not included in this Guidance are not exempted from SHPO review. Please review the final section of this Guidance for activities that do require SHPO review, including special consideration for potential archaeological impacts.

General Exemptions:

Energy Audits and Feasibility Studies

Weatherization of mobile homes and trailers

Appliance replacement

Exempted Exterior Work:

Repairing or replacing in-kind existing driveways, parking areas, walkways, etc.

Excavating to gain access to existing underground utilities to repair or replace them.

Minor excavating (2-3 cubic feet) to rebuild or install new crawl space access.

Air Sealing

- caulking/weatherstripping around doors/windows for infiltration/exfiltration issues.

Doors and Windows

- Replacement of existing windows and doors that are not original to the building.

- Replacement of existing original windows and doors when the replacement window or door matches the size, design, proportion, profile and materials of the original and the size of the window or door opening is not altered (enlarged or reduced). Typical vinyl windows with snap-in grids or a grid between glass panes are not appropriate.

- Installing insulated exterior replacement doors where the openings are not altered and they cannot be viewed from the public right-of-way.

- Installation of storm windows or doors and wood screen doors in a manner that does not harm or obscure original historic windows, doors or trim.

Wall Insulation (no spray foam insulation), subject to the following specifications:

- Minor necessary repairs to prepare exterior walls for insulation are exempted provided the repairs match the original surface composite.

- All wall insulation must have an **adequate vapor barrier or vapor retardant** on the warm (heated) side of the wall **or** consist of a **pre-expanded, closed-cell foam** insulation. Multiple coats of interior wall and ceiling paint are sufficient to meet the criteria of a vapor retardant, per the U.S. Dept. of Energy. More information is available at:

  http://www.energysavers.gov/your_home/insulation_airsealing/index.cfm/mytopic=11810

- No holes are drilled through **original exterior (wood, brick, etc.) siding**, or holes have no permanent visible alteration to the finish materials. Any holes drilled for insulation must be finished and returned to condition as close to the original as possible. Access holes in the walls must be patched or plugged with materials that **match the original** (no plastic plugs).

- Access holes may be patched or plugged with plastic plugs where the original siding was replaced with aluminum or vinyl siding prior to the WAP project.

Painting and Siding

- Painting over previously painted exterior surfaces, provided destructive surface preparation treatments, including, but not limited to, water-blasting, sandblasting and chemical removal, are not used.

- Installation or replacement of gutters and downspouts, provided that their color is historically appropriate for the period and style of the property.

- Repair or replacement of original exterior siding provided that new siding matches the original siding in dimension, profile, texture, and material (for example, replacement in-kind).

- Replacement of existing aluminum or vinyl siding.

Roofing

- Flat or shallow pitch roof replacement (shallow pitch is defined as a pitch with a rise-to-run ratio equal to or less than 3" to 12"), with no part of the surface of the roof visible from the ground.

- Repairing or replacing roofing materials that closely match the historic materials and form, or with materials that restore the original feature based on historic evidence, and in a manner that does not alter the roofline.

Solar

- Small Solar Systems, when they are shingle style and on the rear roof of the structure, not viewable from any public right of way.

Interior Work:

Water Conservation Measures (low flow faucets, toilets, shower heads, urinals)

Air Sealing and Insulation

- Sealing air leaks using weather stripping, door sweeps, and caulk and sealing major air leaks associated with bypasses, ducts, air conditioning units, etc.

- Insulation on water heater tanks, pipes and ducts

- Insulation of floors, ceilings, attics, crawl spaces and foundations in a manner that does not harm or damage historic fabric (no spray foam insulation) including:

  Band joist ("Sill Box") insulation

  Floor insulation, provided that historic floor finishes are not damaged

  Attic insulation, including knee-wall insulation, where insulation has been installed previously and when proper ventilation exists

  Repair of minor roof leaks prior to installing attic insulation

  Attic insulation when no prior insulation has been installed, if there is an **adequate vapor barrier or vapor retardant** on the warm (heated) side of the attic floor, such as fiberglass bat. Multiple coats of interior wall and

ceiling paint are sufficient to meet the criteria of a vapor retardant, per the U.S. Dept. of Energy. More information is available at: **http://www.energysavers.gov/your_home/insulation_airsealing/index.cfm/mytopic=11810**

- Wall insulation (no spray foam insulation**),** subject to the following specifications:

  Minor necessary repairs to prepare walls for insulation are exempted provided the repairs match the original surface composite.

  All wall insulation must have an **adequate vapor barrier or vapor retardant** on the warm (heated) side of the wall **or** consist of a **pre-expanded, closed-cell foam** insulation. Multiple coats of interior wall and ceiling paint are sufficient to meet the criteria of a vapor retardant, per the U.S. Dept. of Energy. More information is available at: **http://www.energysavers.gov/your_home/insulation_airsealing/index.cfm/mytopic=11810**

  Interior holes drilled for insulation must be finished and returned to condition as close to the original as possible. Access holes in the walls must be patched or plugged with materials that **match the original**. No decorative plaster may be damaged.

Fire, Smoke or Carbon Dioxide Detectors / Alarms

- Replacement of existing smoke detector or carbon monoxide detector

- Plug-in carbon monoxide detectors

- New installation of hard-wired devices (occupancy sensors, carbon monoxide sensors, programmable thermostats, smoke detectors) as long as it does not include significant spaces (entrances/entry halls/lobbies, areas for public gathering and circulation, primary rooms). If work occurs in a significant space, work shall not damage historic materials or finishes. New wiring/piping/ductwork, etc. shall be concealed.

HVAC Work

- Clean, tune or repair heating and cooling systems, including furnaces, boilers, heat pumps, vented space heaters, wood stoves, central air conditioners, window air conditioners, heat pumps, and evaporative coolers

- HVAC upgrades (Replacement of boilers, furnaces, etc.) that do not require any new venting or a new location, **or** venting is on the rear of the structure, not visible from any public right of way.

- Install mechanical ventilation, in a manner not visible from the public right of way, to ensure adequate indoor air quality if house is air-sealed to building tightness limit

- Repair or replace vent systems on fossil-fuel-fired heating systems and water heaters to ensure that combustion gasses draft safely to outside if venting is on the rear of the structure, not visible from any public right of way.

- Modify, repair, or replace duct and pipe systems so heating and cooling systems operate efficiently and effectively, including adding return ducts, replace diffusers and registers, replace air filters, install thermostatic radiator controls on steam and hot water heating systems provided:

  The work does not include significant spaces (entrances/entry halls/lobbies, areas for public gathering and circulation, primary rooms). If work occurs in a significant space, work shall not damage historic materials or finishes. New wiring/piping/ductwork, etc. shall be concealed.

- Install programmable thermostats, outdoor reset controls, UL listed energy management systems or building automation systems and other HVAC control systems provided:

  The work does not include significant spaces (entrances/entry halls/lobbies, areas for public gathering and circulation, primary rooms). If work occurs in a significant space, work shall not damage historic materials or finishes. New wiring/piping/ductwork, etc. shall be concealed.

- Ventilating crawl spaces.

- Installing continuous ridge vents covered with ridge shingles or boards, or roof vents, bath and kitchen vents, soffit and frieze board vents, combustion appliance flues, if not located on a primary roof elevation or visible from the public right-of-way.

- Installing foundation vents, if painted or finished to match the existing foundation material.

<u>Lighting and Appliances</u>

- Compact fluorescent light bulbs

- Energy efficient light fixtures (replacement)

- Upgrade exterior lighting (replacement of mercury vapor to metal halide bulbs)

- LED light fixtures & exit signs (replacement)

- New installation of hard-wired devices as long as it does not include significant spaces (entrances/entry halls/lobbies, areas for public gathering and circulation,

primary rooms). If work occurs in a significant space, work shall not damage historic materials or finishes. New wiring/piping/ductwork, etc. shall be concealed.

Plumbing and Electrical Work

- Repairing or upgrading electrical or plumbing systems and installing mechanical equipment, in a manner that does not affect the interior or exterior of the building.

- Repair or replace water heaters that do not require any new venting or a new location, or venting is on the rear of the structure, not viewable from any public right of way.

- New installation of hard-wired devices as long as it does not include significant spaces (entrances/entry halls/lobbies, areas for public gathering and circulation, primary rooms). If work occurs in a significant space, work shall not damage historic materials or finishes. New wiring/piping/ductwork, etc. shall be concealed.

SHPO CONSULTATION REQUIRED

The work listed in the above exemption Guidance will require SHPO review if it does not meet the described conditions, as will any work item *not included* in this Consultation List. The following activities may affect historic properties (36 CFR Part 800.5) and will require SHPO Section 106 review if they affect a structure that is fifty (50) years of age or older:

- Any activity that does not meet the work specifications of this exemption Guidance and follow the Secretary of the Interior's *Standards for Rehabilitation*.

- Any activity that is not specified in this exemption Guidance

- White Roofs, Cool Roofs, Green Roofs, Sod or Grass Roofs

- Small solar systems; combined solar/wind demonstration units on government buildings

- Lead-based paint abatement

- Power washing

- Repairing masonry, including repointing and rebuilding chimneys

- Insulating with any Spray Foam Insulation Products

Ground disturbing activity will always require SHPO consultation for archaeological impacts, regardless of the age of structures on the property.

Ground Disturbing Activity

- Geothermal Heating Systems
- Small-scale concrete slab work, such as placing a slab for a garage or for an addition to an existing building.
- Small-scale new construction in urban and residential settings. Examples of small-scale construction would be a detached garage or a shed.
- New construction
- Any ground disturbing activity in the cities of Saginaw, St. Ignace, Bay City, Mackinaw City and Sault Ste. Marie.

TERMS OF USE

Any work item in the WAP program that is not addressed in this list shall be subject to SHPO consultation. This Guidance only applies to projects funded through the WAP program as part of the DOE's Energy Efficiency and Renewable Energy Program (EERE), part of the American Recovery and Reinvestment Act (ARRA) and set to expire in 2012. The terms of this Guidance shall then terminate unless otherwise agreed to by the SHPO. This Guidance is for the exclusive use of the WAP program and shall not apply to any other federally-funded program. The DHS and its delegated entities are advised to document all points of their decision-making in order to demonstrate proper compliance with Section 106.

REFERENCES

- PA 230 of 1981, as amended, being MCL 400.1101 et seq.
- 10 CFR §440.10 and 440.15 Weatherization Assistance Program for Low-Income Persons- Final Rule
- The Weatherization Assistance for Low-Income Persons Act, 42 U.S.C. 6861 et seq., as amended.

PURPOSE

To establish policy and procedures for program termination or reduction in funding under the Weatherization Program.

- 10 CFR §440.10 states:

  "(f) DOE may reduce the program allocation for a state by the amount DOE determines cannot be reasonably expended by a grantee to weatherize dwelling units during the budget period for which financial assistance is to be awarded."

- 10 CFR §440.15 states:

  "A State may terminate financial assistance under a subgrant agreement for a grant period only in accordance with established State procedures that provide to the subgrantee appropriate notice of the State's reasons for termination and afford the subgrantee an adequate opportunity to be heard."

  Note: Michigan's eligible subgrantees are listed as subgrantees or Local Weatherization Operators in Michigan's DOE State plan each year.

POLICY

Cause for Reduction of Funding- Statewide Redistribution of Funds

Department of Health & Human Services (DHHS) may do a statewide redistribution of weatherization funds in response to any of the following:

1. A review of each Grantee's spending and production resulting in the need to adjust Grantee allocations to maximize the number of homes weatherized in Michigan.

2. The results of the most recently available census or other appropriate data.
3. Notification of funding decreases by the funding source.

Cause for Termination of Funding

1. If DHHS determines that insufficient progress is being made to bring resolution to issues of non-compliance, DHHS will formally designate program deficiencies.

   DHHS will send a letter to the Grantee Executive Director and Board of Directors notifying them that DHS has formally designated one or more program deficiencies within their agency.

   At the point program deficiencies are designated, a Quality Improvement Plan (QIP) may be required.

   If DHHS determines (taking into account the seriousness of the deficiency and the time reasonably required to correct the deficiency) that a QIP is not appropriate, DHHS will send a letter to the Grantee Executive Director and Board of Directors notifying them of the reasons that the Grantee will not be allowed to implement a QIP

2. If a QIP is required, the Grantee will have 60 calendar days to submit their QIP to DHHS.

3. Within 30 calendar days of receipt, DHS will approve the QIP or specify in writing the reasons why the QIP is unacceptable.

4. DHHS will make reasonable efforts to provide training and technical assistance to the Grantee for purposes of implementing the QIP.

5. In order to ensure services are being provided to clients, DHHS reserves the right to find an interim provider to service an area if a Grantee QIP implementation will take a significant amount of the grant period.

6. If the QIP continues to be unacceptable after 30 days, or if at any point DHHS determines that insufficient progress is being made to correct deficiencies, DHHS may proceed to program termination.

7. DHHS will notify the Grantee Executive Director, Weatherization Program Coordinator, and Board of Directors, if applicable, in writing of its decision to

terminate the weatherization program at least 30 days prior to the effective date of the termination.

APPEALS

- A Grantee may appeal a DHHS decision related to a QIP, or the initiation of program termination procedures by submitting a written statement describing the reason for the appeal.

- Written appeals must be submitted no later than 14 calendar days after the Grantee receives notification of the DHHS decision in question.

- Appeals must be submitted to the Director of the Department of Health & Human Services at the address below:

  Department of Health & Human Services
  235 South Grand Avenue
  PO Box 30037
  Lansing, MI 48909

- At the discretion of the DHHS Director, a meeting may be called or other action may be taken in an attempt to come to resolve the appeal.

- The decision of the DHHS Director to accept or reject an appeal is final.

- The Grantee will be notified of the DHHS decision to accept or reject an appeal within 30 days of its receipt.

REFERENCES

- CFR 440.21
- DOE Weatherization Program Notice 10-17
- Community Services Policy Manual 606.1

PURPOSE

Per Department of Energy (DOE) Weatherization Program Notice 10-17, page 2:

"This guidance is specifically designed to address the DOE investment in eligible dwelling units weatherized by the Program. All associated health and safety costs incurred on a dwelling unit are generally treated outside the SIR when determining cost-effectiveness. On the other hand, all energy-related repair costs associated with weatherizing the dwelling units are a part of the SIR when determining cost-effectiveness.

When performing the energy audit on an eligible dwelling unit, the total costs associated with the installation of eligible measures – as listed in Appendix A - can be discounted by the amount of non-Federal resources leveraged for that particular measure in determining the SIR. The types of non-Federal resources that could be used would include, but are not limited to: landlord contributions, utility funds, donations from private sources, and/or state resources that supplement other similar funds. It is DOE's intent to allow subgrantees some flexibility in calculating the SIR for a specific measure when other funds can be used to offset some of the costs, thereby reducing the federal investment and raising the SIR to 1.0 or greater on the remaining investment.

The cost-effectiveness of the WAP will still be calculated on the total DOE investments used to weatherize the property. It is not DOE's intent to create projects that are not cost effective in design and installation. DOE expects that all subgrantees will use this SIR calculation allowance only when the cost effectiveness for the entire investment in the property can still be substantiated. Further, it is not DOE's intent to "leapfrog" measures that are already cost-effective in order to accommodate a measure that is included in the package of measures as a result of utilizing the provisions of this guidance. All measures that were cost-effective after the initial energy audit is conducted would remain a part of the list of measures to be completed on the unit. **Note:** For the purpose of meeting the SIR requirement by using other resources to

reduce the investment in a material or measure, no federal resources or funds may be used to offset the total installation cost. This includes State designated funds which are actually federal-based funds such as LIHEAP, CDBG, etc., may not be used for this purpose. No exceptions will be granted to this provision.

Grantees utilizing this guidance will need to conduct an initial energy audit of the building to determine the cost-effectiveness of the federal investment, including measures that are not cost-effective without leveraged resources. Those agencies that have non-Federal resources for use in the building will need to run the energy audit a second time with the necessary resources for any specified measure(s) to ensure the total package of measures remain at least with an SIR of 1.0 or greater. A second energy audit run can be eliminated by indicating what measures will need to utilize this flexibility and the amount of funds necessary to accomplish the buy-down.

Grantees will also be required to complete a summary of all costs associated with the weatherization of the building, including any or all non-Federal resources to be used. This summary will become part of the building's customer file along with the inputs and results of both energy audits."

POLICY

Cumulative SIR:

For any job completed using DOE funding, the cumulative SIR of the total DOE investment must be 1.0 or greater. Health and Safety, including Lead Safe Work costs, are not included in the calculation of the cumulative SIR.

All energy related repair costs are used to determine the cumulative SIR. These include:

- Incidental repair costs
- Optional weatherization measures costs
- Duct costs
- Attic venting costs
- Foundation venting costs

Buy-Down Fund Sources:

If the energy audit results in an SIR of under 1.0, the Grantee can discount the total costs associated with the installation of eligible measures by the amount of non-Federal

resources leveraged for that particular measure(s) in determining the SIR.

The types of non-Federal resources that can be used would include, but are not limited to:

- Landlord contributions
- Utility funds
- Donations from private sources
- State resources that supplement other similar funds

NOTE: Subgrantees cannot use or request co-pay amounts from weatherization household members to buy-down measures.

For WA 8.6/NEAT/MHEA audit instructions regarding this matter, see Community Services Policy Manual 606.1

REFERENCES

- Weatherization Program Notice 10-8, 16-1
- 10 CFR 600.153(f)
- 5 U.S.C. 552 Freedom of Information Act
- Michigan Freedom of Information Act 442
- DOE Agreements
- LIHEAP Agreements

PURPOSE

To ensure the confidentiality of Weatherization applicants and recipients confidential information. To provide guidance to Weatherization Grantees regarding inquiries for weatherization data, program data, and requests to participate in studies, surveys, and/or evaluations.

POLICY

All Grantees of the Weatherization Assistance Program (WAP) must adhere to the following policy regarding client data.

The Bureau of Community Action & Economic Opportunity (BCAEO) adheres to the transparency requirements placed on these and other government financial assistance programs instituted by the federal government and state government. The BCAEO will work diligently with any state WAP or local weatherization provider to gather the required information and provide it to the requestor. However, the BCAEO must comply with all requirements of the Government to protect the privacy interests of individuals who participate in these financial assistance programs.

Per Weatherization Program Notice (WPN) 10-08: In accordance with 10 CFR 600.153(f) Retention and access requirements for records, “Unless required by statute, Department of Energy (DOE) shall place no restrictions on recipients that limit public access to the records of recipients that are pertinent to an award, except when DOE can demonstrate that such records shall be kept confidential and would have been exempted from disclosure pursuant to the Freedom of Information Act (5 U.S.C. 552) if the records had belonged to DOE.” DOE would be legally required, pursuant to 5 U.S.C. 552(b)(6), of the Freedom of Information Act, to keep confidential any specifically identifying information related to an individual’s eligibility application for WAP, or the individual’s participation in WAP, such as name, address, or income information. Thus, BCAEO and Grantees should extend that same protection to their client records for WAP. States may release information about recipients in the

aggregate and which does not identify specific individuals. For example, information on the number of recipients in a county, city, or a zip code does not compromise the privacy of the recipients.

A Grantee can provide aggregate data, as defined in the paragraph above. The Grantee is responsible for ensuring the data is accurate and what has been reported to BCAEO.

Grantees may share pertinent information to subcontractors when a) use of a subcontractor is acceptable per the agreement language b) the disclosure is necessary or otherwise naturally occurs in connection with work that is within the subcontractor's scope of responsibility, and (C) the Grantee obligates the subcontractor in a written Agreement to maintain the state's confidential information in confidence. At the state's request, any employee of the Grantee and of any subcontractor having access or continued access to the state's confidential information may be required to execute an acknowledgment that the employee has been advised of the Grantee's and the subcontractor's obligations under this section and of the employee's obligation to the Grantee or subcontractor, as the case may be, to protect the confidential information from unauthorized use or disclosure

Data Requests/Data Sharing

Data related to a Grantees Weatherization program is confidential. Sharing identifying information, when necessary, is acceptable between the Grantee and the BCAEO. If an agency receives a request for confidential data from entities or persons other than the State, the Grantee must submit a request for approval to the state.

Participation in Weatherization Related Evaluations, Studies, and Surveys

All requests to participate in Weatherization related Evaluations, Studies, and Surveys must be submitted for approval to BCAEO. BCAEO will review with the DOE to ensure there is not a breach of confidentiality. Additionally, BCAEO will determine if the study is relevant to the intent of the Weatherization Assistance Program.

Grantees that receive a request to participate in an activity outlined above, the Grantee should obtain the following information before submitting to BCAEO:

- All interested parties involved in activity
- Purpose/Hypothesis of activity
- Data that will be collected
- Estimated length of time to complete activity
- Method of Evaluation of Results
- Where results will be published and/or shared

REFERENCES

- Weatherization Program Notice 12-7, 16-1
- 10 CFR 440
- DOE Agreements
- LIHEAP Agreements

PURPOSE

To provide guidance on allowable activities using Department of Energy (DOE) Weatherization Assistance Program (WAP) resources to low income individuals and families in the event of disasters as declared by the President of the United States or the State of Michigan Governor.

POLICY

All Grantees of the Weatherization Assistance Program (WAP) must adhere to the following policy if considering requesting weatherization funding toward disaster planning and relief.

Disaster relief funds are to be used only in the event of a declared emergency at the state or federal level and shall be used only to provide emergency services to low income individuals and families in the designated disaster area. WAP has a very limited role in any disaster response plan. DOE funds are very limited to eligible weatherization activities and the purchase and delivery of weatherization materials.

To the extent services are in support of eligible weatherization (or permissible reweatherization) work for eligible households, such expenditure is allowable. Allowable expenditures under WAP include:

- The cost of incidental repairs to an eligible dwelling unit if such repairs are necessary to make the installation of weatherization materials effective.
- The cost of eliminating health and safety hazards, elimination of which is necessary before the installation of weatherization materials.
- Weatherization personnel can be paid from DOE funds to perform functions related to protecting the DOE investment. Such activities include: securing weatherization materials, tools, equipment, weatherization vehicles, or protection of local agency weatherization files, records and the like during the initial phase of the disaster response.
- Local agencies may use weatherization vehicles and/or equipment to help assist in disaster relief provided the WAP is reimbursed according to the DOE regulations.

The use of DOE funds for relief efforts is limited to the following:

- The total allowance for relief efforts limited to allowance of $6500 per dwelling unit.
- The total allowance for incidental repairs in support of installation of weatherization materials is limited to the current maximum reimbursement for minor envelope repairs per contract and policy language.
- The total allowance for installation of each weatherization measure if limited to the current maximum reimbursement Grantee contract.

To the extent that the services are in support of eligible weatherization (or permissible re-weatherization) work, such expenditure would be allowable. For example, debris removal at a dwelling unit so that the unit can be weatherized would be an allowable cost. Debris removal from a dwelling unit that is not to be weatherized would not be an allowable cost. As such, *using DOE funds to pay for weatherization personnel to perform relief work in the community as a result of a disaster is not allowable.*

Reprioritization of Weatherization requests

For reprioritization of weatherization requests coming from the disaster area, WAP rules require that priority be given to identifying and providing weatherization assistance to elderly persons, persons with disabilities, families with children, high residential energy users, and households with high energy burdens (10 CFR 440.16(b)). However, it would be permissible to consider households located in the disaster area a priority as long as the households are eligible and meet one of the priorities established in regulation and are free and clear of any insurance claim or other form of compensation resulting from damage incurred from the disaster.

Reweatherization work

In the event of a declared federal or state disaster, weatherization crews may return to a unit reported as a completion to DOE that has been “damaged by fire, flood, or act of God, to be re-weatherized, without regard to the date of weatherization”. 10 CFR 440.18(f)(2)(ii). Local authorities must deem the dwelling unit(s) salvageable as well as habitable and the damage to the materials is not covered by insurance or other form of compensation.

Grantee Requests for Disaster Relief Funds

If funding is available, BCAEO will consider all requests from Grantees for disaster relief funds that meet the outlined criteria. The requests must include the following components:

- Overview of disaster
- Date disaster was declared a federal or state disaster
- Additional funding requested, if applicable

- How weatherization funds/weatherization work will be utilized to enhance disaster relief funds in the federal or state defined disaster area.

Grantees must submit requests to the MDHHS-BCAEO@michigan.gov mailbox. Once submitted, BCAEO will review with the assistance of the DOE.

Funding for Disaster Planning and Relief
If BCAEO approves a Grantee disaster relief plan, an agency can dedicate current year allocation and funding to the identified disaster area, and serve that area as priority over other areas.

In the event the Grantee requests additional funding for the disaster relief efforts, BCAEO, with the approval of DOE via the state plan, reserves the right to allocate additional funds to a designated disaster site if the state.