

Community Services Policy Manual

600 Series

DOE Policy

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601 – INCOME ELIGIBILITY GUIDELINES

REFERENCES

- 10 CFR Part 440, Weatherization Assistance Program for Low-Income Persons
- Federal Register, Department of Health and Human Services (HHS) Annual Update of the HHS Poverty Guidelines
- Department of Energy (DOE) 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 level income guidelines to determine eligibility for the DOE Weatherization Assistance Program (WAP). Income refers to total cash receipts (gross) before taxes from all sources (see Income Inclusions/Exclusions below) for all household members.

Applicant's File

Grantees must maintain a file for all recipients of weatherization services. A copy of the client's FACSPRO Customer Report or the DHS-4283 with original client and agency signatures must be in the physical file. All other required file documents must be uploaded onto FACSPRO (See CSPM Item 612, CSPM Item 903, and CSPM Item 909).

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, the redetermination of a household's eligibility, must occur at least every 12 months from the eligibility date if the energy audit has not yet been initiated. The eligibility date is the date that the agency determines eligibility. This date must be within 30 calendar days

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from the date all documents needed for eligibility determination are received. In WxPro, this date defaults to the date that the client action plan is created. (See CSPM Item 612).

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 application date:

- 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.

Household Composition

Income from all household members is used to determine income eligibility. A household is all persons occupying a housing unit, regardless of whether they are related.

Roomers

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.

Income Computations

Income eligibility must be determined before the eligibility date is set and the client action plan has been created in FACSPRO. In FACSPRO, the create interaction button creates the action plan, determines the eligibility date and stores the income screens that are used to determine income eligibility. The income screens for all household income must be completed with the current, relevant, assessed income eligibility information before the create interaction button is clicked.

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An applicant's household's gross actual income for the preceding three-month period including the application date is computed in FACSPRO to be annualized.

Gross income is the total income received before deductions such as taxes, medical premiums, retirement plans, garnishments, child support, or other deductions. Gross income for all household members (except as specifically excluded) is countable income.

For example, an application with an application date of June 7 would have a three-month income calculation period of March 8 – June 7. Income must be entered into FACSPRO using the Annual option and entering the last three months of income.

Note: If a three-month lookback period is not representative of a household member's annual income, Grantees have the option of requesting a *six or twelve-month period* of documentation. An explanation of using this option must be clearly noted.

For each household member, the income computation process should include actual received current gross income documentation, current and prior monthly benefit documentation, W-2s or income tax returns for prior year's income, and, as a last resort, self-declarations. (See Self-Declarations below).

Best Practice - Pay period ending dates should not be used unless it is documented that the applicant/household member receives their payments on the same date.

Documentation of Income

Income must be thoroughly documented and uploaded to FACSPRO (See CSPM Item 612 and CSPM Item 909). 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 documentation showing net income after business expenses.
- W-2 statements and tax forms

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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 application date. 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

Self-Declarations of Income

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 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 MDHHS 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 name and FACSPRO System ID for each household member and an explanation of how the household is paying for their living costs.

Income Guidelines

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

INCOME INCLUSIONS/EXCLUSIONS

Income Includes:

1. Gross wages/earnings and salaries before any deductions.
2. Self-Employment Income for each type of self-employment activity or business (See Self-Employment Income section below).

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- 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. Wages from Assistantships, Work Study, and Student Stipends.
 4. Social Security (Retirement, Survivor's, Dependent's, and Disability Insurance Income) gross benefits, including any Medicare premium*.
 5. Supplemental Security Income (SSI)*.
 6. Railroad Retirement payments*.
 - *Note: Retroactive lump sum payments for Supplemental Security Income (SSI), Social Security Insurance or Railroad Retirement Benefits should be prorated on a 12-month basis so that only benefits covering the three-month calculation period are included.
 7. State SSI Supplemental Quarterly Payment.
 8. Unemployment Compensation Benefits, Strike Benefits from Union Funds.
 9. Worker's Compensation, and/or private Long- and Short-Term Disability Payments.
 10. Veteran's Payments: VA Service-Connected Disability Compensation; VA Non-Service Connected Disability Pension; Military Retirement Pay, and Military Family Allotments.
 11. TANF- Family Independence Program-FIP (Cash Assistance Title IV) and State Disability Assistance (SDA)
 12. Alimony or Spousal support.
 13. Private Pensions, Government Employee Pensions, and other Retirement income (not including Social Security Retirement Income).
 14. Annuity Payments and Insurance Payments.
 15. Income from Individual Retirement Accounts (IRAs) received during the computation period, whether received as monthly or in a lump-sum withdrawal.
 - Note: Lump-Sum IRA withdrawals should be prorated on a 12-month basis and the three months of prorated amount should be included in the computation.
 16. Income from Dividends, Interest, Stocks or Bonds.
 17. Net Rental Income, including income from Roomers.
 18. Training Stipends

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19. Net Royalties; Net Gambling/Casino, or Lottery winnings.
20. Periodic Receipts from Estates or Trusts.
21. Tribal Payments - Any payments received by Native Americans, such as income from Casinos or other Tribal Income.
22. Joint Income received by more than one individual. Divide the income equally among recipients.
23. Third party benefits paid directly to a company for a client's housing or bills. Third party benefits are only counted as income if they are paid to a company or entity in lieu of paying an individual Alimony or Wages directly.

Income Excludes:

1. Combat Zone pay to the Military.
2. Housing assistance to the Military.
3. Capital gains or money from the sale of a house, property or vehicle.
4. Any assets drawn down as withdrawals from a bank or financial institution.
5. Emergency Assistance Program payment to a family or a person who is in temporary financial difficulty.
6. Tax Refunds or Earned Income Tax Credit.
7. Loans or Gifts.
8. Lump-Sum Inheritances
9. Compensation for injury or One-time Insurance Payments.
10. 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).
11. Food or housing received in lieu of Wages/Earnings (in-kind).
12. The value of food and fuel produced and consumed on farms or the imputed value of rent from owner-occupied non-farm or farm housing, depreciation for farm or business assets.

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13. Federal Non-Cash Benefit Programs such as: Medicare (Medicare premiums are not excluded), Medicaid, Food Assistance Program benefits (including cash received in lieu of food stamps), school lunches, Housing Assistance, Childcare Vouchers, WIC, LIHEAP, or Affordable Care Act Subsidy.
14. Reverse mortgages.
15. College Scholarships and Grants.
16. Child Support.
17. Foster Care Payments (including Foster Grandparent Payments), Adoption Subsidies, Family Support Subsidies, Independent Living Stipends (Foster Care) and Guardianship Assistance Payments.
18. Student Income - Income earned by a child age 18 and under and attending high school.

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

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.

Example: 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

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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.

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602 – PROGRAMMATIC REPORTING

REFERENCES

- Weatherization Assistance Program (WAP) Program Agreement
- Weatherization Program Notice 20-1

PURPOSE

The WAP 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 following 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 a Grantee is entering any completed jobs in the first 14 days of the month following the report month, the Grantee must change the pull funding date in FACSPRO to a date in the month of the reporting period.

WAP Monthly Programmatic Report FACSPRO 1071

Summary

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

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

The data for each WAP unit is gathered from FACSPRO jobs that are in Final Close Out and have costs on the Cost Center.

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.

All demographics are pulled from the household at the time the action plan was created in FACSPRO. Re-weatherized units will be counted on the FACSPRO 1071 report automatically from information entered into FACSPRO upon intake.

Weatherized units are considered complete based on date of final close out in WxPro and a completed cost center. Jobs completed in the reporting month must be moved to final close out by the 14th day of the following month. Jobs completed in the reporting month may not be moved to final close out after that date without approval from the BCAEO.

After the 14th day of the month following the report month, Grantees will be unable to pull funding and move jobs to Final Close Out without contacting BCAEO. The Grantee must contact BCAEO, provide documentation on why the jobs is being reported late and follow the plan laid out by BCAEO staff to have the job moved.

If a Grantee wishes to adjust any jobs that have been moved to final close out for a preceding month, the Grantee must make a request to BCAEO that specifies the intended changes and a justification for making these changes to jobs that have been previously moved to final close out.

Completed Units

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

- All intake documentation has been entered and uploaded into FACSPRO
- 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.

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- All weatherization materials have been installed in compliance with the Michigan Weatherization Field Guide, 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. See CSPM 612 for applicant file documentation requirements.
- The Grantee, or its authorized representative, has performed and approved final inspection as a certified Quality Control Inspector.
 - The final inspection must take place as an assessment of all measures on the work order. An agency may not make multiple payments for the initial Quality Control Inspection.
- 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 columns.

Justified Reason to Stop Work

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 has stopped. Examples of reasons to stop weatherization work:

- Death of a client
- Dwelling is vacated and/or sold.
- Unable to contact client after numerous, documented attempts.
- Client refuses further weatherization work.
- Client refuses Health and 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. The job must not be moved to the Final Close Out Queue in WxPro and is not considered a completion. This work may be reimbursed on the agency’s Statement of Expenditures but will not count as a completed job and will impact the agency’s average cost per unit.

Defining a DOE Unit

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DOE defines a DOE Weatherized unit as: A dwelling on which a DOE-approved energy audit has been applied and weatherization work has been completed. As funds allow, the measures installed on this unit and paid for with DOE funds have a Savings-to-Investment Ratio (SIR) of 1.0 or greater considering final costs, but also may include any necessary energy-related health and safety measures.

No DOE funded Health & Safety measures can be performed in a home unless at least one DOE costed Energy Conservation Measure (ECM) is also part of the scope of work.

Incidental Repair Measures and ancillary measures cannot be installed unless they are linked to an individual ECM or package of ECMs paid for out of DOE funds.

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 WZ files must be uploaded into the agency's SharePoint folder under:

_Weatherization Assistance Program →
 _Libraries →
 PY folder

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603 – OVERSIGHT OF LOCAL WEATHERIZATION PROGRAMS

REFERENCES

- 10 CFR Part 440, Weatherization Assistance Program for Low-Income Person
- Department of Energy (DOE) Weatherization Program Notice 15-4
- WAP Memorandum 034
- Michigan Weatherization Field Guide
- WAP Agreements

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. Grantees can use this as guidance when conducting the same internal monitoring process.

POLICY

To provide adequate oversight, it is the Grantee's responsibility to train and provide information to the subcontractors on the WAP 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 completing weatherization work in compliance with the Standard Work Specifications (SWS) outlined in the Michigan Weatherization Field Guide and the Community Services Policy Manual (CSPM). All contracts must have this language included.
- A system for monitoring subcontractors and dwelling units.

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- 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 work to ensure compliance with all DOE WAP and HHS regulations and guidance, and MDHHS 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

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- 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 WxPro Monitoring module. BCAEO Technical Weatherization monitors will monitor 10% of agency file documentation and complete 5% site visits for each agency. BCAEO makes every effort to have an accurate estimated production count for each agency in order to meet the 5% requirement for onsite monitoring. In cases where it is revealed through the final production count that an agency has exceeded production to a point where an additional onsite monitoring would have been required to meet 5%, the BCAEO technical monitor will add an additional job to his or her onsite monitoring in the following program year.

Due to COVID-19 during PY 2019, some onsite quality assurance monitorings had to be cancelled. BCAEO technical monitors will track which agencies did not receive onsite quality assurance monitoring in PY19 and will make up for these in PY20.

Grantees that run a program with a production of 30 units or less, or Grantees experiencing a staffing barrier to complete production, may apply for a waiver to use the same inspector to perform the energy audit and the quality control inspection. BCAEO Technical Weatherization monitors will complete 10% site visits and 20% file reviews for Grantees that use this option. The Grantee must request a waiver from BCAEO before utilizing this option. Waiver requests shall be sent as an email to MDHHS-BCAEO@michigan.gov and shall include the agency's justification for using this option. If approved, the waiver will be valid only for the program year for which it is being requested. In addition, BCAEO will conduct more follow-up reviews and require the agency to implement a Corrective Action Plan to resolve the issues that necessitated the waiver request within the program year or 6 months from waiver approval. BCAEO may require the Grantee to schedule monthly calls with BCAEO to determine the agency's progress to increase staffing capacity.

In Progress Technical Monitoring

In addition to monitoring completed units, monitors inspect units in progress to identify best practices and/or shortfalls early in the process and to allow for onsite training and

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technical assistance opportunities in lieu of potential disallowed costs (as resources permit). The in progress monitoring is intended to serve as training and technical assistance.

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.

COVID-19 Safety Protocol

Grantees stopped in-person work in the Michigan DOE WAP due to the COVID-19 pandemic in PY2019. Grantees must have a local COVID-19 safety policy in place before they may proceed with in-person work.

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604 – ITEMIZED SUBCONTRACTOR INVOICES

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 (QCI). The QCI must sign off indicating that measures have been installed to Michigan Field Guide/Standard Work Specifications before payment may be made to the contractor that installed those measures. All queues in WxPro must be maintained within the appropriate timeframes. Please refer to CSPM 905 for these timeframes.

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.

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Community Services Policy Manual	SUBJECT: Weatherization Assistance Program REWEATHERIZATION OF DWELLING UNITS		EFFECTIVE DATE 7/1/2018 ISSUE DATE 3/31/2009

605 – REWEATHERIZATION OF DWELLING UNITS

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.

Rewatherized units will be reported separately on the Weatherization Assistance Program Monthly Programmatic Report, DHS-1071. See Item 602 for further guidance on the 1071 report.

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

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606 – PROGRAM REQUIREMENTS

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 DOE
- State of Michigan DOE State Plan
- Weatherization Program Notices 19-1, 19-4
- Standard Work Specifications (SWS)
- Michigan Weatherization Field Guide

PURPOSE

DOE requires that certain Weatherization Assistance Program (WAP) requirements are met.

POLICY

Grantees are required to administer this grant following the U.S. DOE 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 Michigan Weatherization Field Guide and the 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 WAP Service Plan, as approved by MDHHS.

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.

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All weatherization work must have an 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. If the QCI is not agency staff, but working as a contractor, he or she may not be employed by a contractor that has completed work on the home.

Client Eligibility

The Grantee is required to utilize a priority point system when providing weatherization assistance to elderly persons, persons with disabilities, families with children, high residential energy users, and households with high energy burden. See CSPM 611 for details.

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. Nontraditional dwelling types such as shelters and mixed use buildings, while allowed, must be approved by BCAEO prior to weatherization to ensure that the dwelling meets program regulations. If deemed necessary, BCAEO will seek approval from DOE for the weatherization of the nontraditional dwelling.

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

1. Has income at or below 200 percent of the poverty level established by the U.S. Department of Health and Human Services; or
2. Contains a member who has received any one of the following at any time during the 12-month period preceding the eligibility date:
 - Cash assistance payments under Title IV (FIP), or
 - XVI of the Social Security Act (SSI);
3. Occupies a qualified rental dwelling unit in accordance with CSPM Item 608;
4. Occupies a shelter, group home or transitional facility in accordance with CSPM Item 608.1.

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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.

Rental vs. Owner Occupied Units

There are no restrictions to the measures installed to any unit based on it being renter or owner occupied. All allowable measures determined via the DOE approved audit are appropriately installed in any eligible unit regardless of the type. See CSPM Item 608.3, 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.

Land Contracts, Life Tenancy, Life Lease Agreements

When an applicant for WAP services has an executed land contract, life tenancy, or life lease agreement that grants them use of the property that is being considered for weatherization for an extended period, such documentation may be accepted confirmation of “ownership” if the requirements of this section are met. An executed copy of the agreements(s) must be presented to confirm proof of ownership and meet the following conditions.

Income eligible applicants presenting documents meeting of the terms and conditions listed below may be considered owners that are eligible for assistance. In instances where the agreement does not meet the conditions, the applicant should be considered a renter.

The Agreement must meet the following conditions:

- The entire Agreement must be in writing
- It must identify the parties to the agreement (e.g., seller/purchaser, grantor/grantee)
- It must describe the property sufficiently to be able to identify it.
- It must state consideration (e.g., purchase price, “one dollar”).
- It must contain all of the terms of the parties’ agreement, including who is responsible for maintaining and repairing the property.
- It must be signed by the parties, their signatures notarized and filed with the county clerk’s office in the county where the property is located.

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- It must provide the purchaser of life tenant is responsible for payment of all taxes on the property.

Additional Program Requirements

See CSPM 606.1, 606.2 and 606.3 for more specific program requirements.

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Community Services Policy Manual	SUBJECT: Weatherization Assistance Program PROGRAM REQUIREMENTS – WAP AUDITING TOOLS		EFFECTIVE DATE 8/14/2020 ISSUE DATE 6/28/2017

606.1 – PROGRAM REQUIREMENTS – WAP AUDITING TOOLS

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 19-4
- WAP Memorandum 035
- DOE Agreement
- Michigan Weatherization Field Guide

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 are required for each home weatherized.

POLICY

Approved audits for the State of Michigan include:

National Energy Audit Tool (NEAT)

- Approved by DOE 9/8/2016.
- Required for the determination of weatherization measures to be installed for one to four unit dwellings.

Manufactured Housing (MHEA)

- Approved by DOE 9/8/2016.
- Required for the determination of weatherization measures to be installed for manufactured (or mobile) homes.

Both NEAT and MHEA are operated through software called Weatherization Assistant. Grantees must use Weatherization Assistant version 8.9. Oak Ridge National Laboratory and DOE will release a cloud-based version of Weatherization Assistant

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during PY2019. After that release, BCAEO will inform the network when it is appropriate to begin using the new version of the software.

Only the qualified 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.

Field documentation shall be on a SOM approved field audit and provide all information required to complete NEAT/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 audits shall be completed in compliance with the NEAT/MHEA Manual instructions. Weatherization measures with a computed Savings to Investment Ratio (SIR) of 1 or greater as calculated by a NEAT/MHEA audit shall be addressed, unless allowed to be skipped. Measure skipping is generally not allowed in the WAP. For further details on the allowability of Measure Skipping, see the Measure Skipping Clarification section of CSPM 606.3.

Weatherization Assistant 8.9 General Setup

Set up instructions are located at the following web site:
<https://nascsp.org/wap/waptac/wap-resources/best-practices/home-energy-audits/weatherization-assistant/weatherization-assistant-8-9/>

Grantees shall create and maintain an annual master file, updating the agency’s file most recently approved by BCAEO. Identify the file with the agency acronym and the program year as the title.

Grantees shall enter approved work plan fuel cost data in the “Fuel Cost” tab of the NEAT/ MHEA “Set up Library”. Grantees must check the costs of fuels in their service area at least once a year and update the costs if necessary. Fuel costs should be typical- avoid high or low short-term values. Grantees may have multiple fuel cost libraries in any given setup library, but each must contain prices for all fuels. Thus, if the

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Grantee area is served by two different natural gas companies and two different electric companies, in order to account for all possibilities of service from these four companies, you would need four different fuel cost libraries. If the number of service companies in the service area is over 2, Grantees may attempt to average prices for a given fuel from providers whose prices do not differ significantly. The Michigan Public Service Commission provides average pricing for Michigan on their website at www.michigan.gov/lara.

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

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

Weather Data

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

Material and Labor Costs

Grantees shall enter their material and labor costs for the allowable NEAT/MHEA measures. Costs shall be separated into the Material and Labor columns respectively.

NEAT Setup

The NEAT setup shall allow for the consideration of the following Candidate Measures/Weatherization Measures listed below as **ON**; Grantees Shall turn **OFF** the measures marked as **OFF** below:

- | | |
|---------------------------|-----------|
| 1. Attic R-11 | ON |
| 2. Attic R-19 | ON |
| 3. Attic R-30 | ON |
| 4. Attic R-38 | ON |
| 5. Attic R-49 | ON |
| 6. Filling Ceiling Cavity | ON |

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- 7. Sillbox insulation **ON**
- 8. White roof coating **OFF**
- 9. Foundation Wall Insulation **ON**
- 10. Floor R-11 **ON**
- 11. Floor R-19 **ON**
- 12. Floor R-30 **ON**
- 13. Floor R-38 **ON**
- 14. Wall Insulation **ON**
- 15. Kneewall Insulation **ON**
- 16. Duct Insulation **ON**
- 17. Window sealing **ON**
- 18. Door Replacement **ON**
- 19. Storm Windows **ON**
- 20. Window Replacement **ON**
- 21. Low E windows **ON**
- 22. Window Shading (awning) **OFF**
- 23. Sun screen fabric **OFF**
- 24. Sun screen louvered **OFF**
- 25. Window film **OFF**
- 26. Thermal Vent Damper **OFF**
- 27. Electric Vent Damper **OFF**
- 28. IID **OFF**
- 29. Electric vent damper IID **ON**
- 30. Flame retention burner **OFF**
- 31. Furnace Tune-ups **ON**
- 32. Replace Heating System **ON**
- 33. High eff Furnace **ON**
- 34. High eff boiler **ON**
- 35. Smart Thermostat **ON**
- 36. Tune-up AC **OFF**
- 37. Replace AC **OFF**
- 38. Evaporative cooler **OFF**
- 39. Install/Replace heatpump **ON**
- 40. Lighting Retrofits **ON**
- 41. Refrigerator Replacement **ON**
- 42. Water Heater Tank insulation **OFF**
- 43. Water Heater Pipe Insulation **OFF**

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44. Low flow showerheads **OFF**
45. Water Heater Replacement **ON**

Ducts outside of the conditioned space must be evaluated for leakage. The Grantee must seal all ducts located outside the conditioned space that have a pressure pan reading above 1 PA.

Faucet Aerators are to be added as a User Defined Measure.

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 BCAEO

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

MHEA Setup

The MHEA setup shall allow for the consideration of the following Candidate Measures/Weatherization Measures listed below as **ON**; Grantees Shall turn **OFF** the measures marked as **OFF** below:

- *1. Seal Ducts **ON**
2. General Air Sealing **ON**
3. Wall Fiberglass batt insl **ON**
4. Wall Fiberglass batt in Addition **ON**
5. Wall cellulose loose insl **OFF**

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- | | |
|---------------------------------------------|------------|
| 6. Wall cellulose loose insl in Addition | ON |
| 7. Wall fiberglass loos insl | ON |
| 8. Wall fiberglass loose insl in Addition | ON |
| 9. Floor Cellulose loose insl | OFF |
| 10. Floor cellulose loose insl in Addition | ON |
| 11. Floor fiberglass loose insl | ON |
| 12. Floor Fiberglass loose insl in Addition | ON |
| 13. Roof cellulose loose insl | OFF |
| 14. Roof cellulose loose insl in Addition | ON |
| 15. Roof fiberglass loose insl | ON |
| 16. Roof fiberglass loose insl in Addition | ON |
| 17. Add Skirting | OFF |
| 18. Add Skirting on Addition | OFF |
| 19. White coat roof | OFF |
| 20. White coat roof in Addition | OFF |
| 21. Replace marked doors (mandatory) | ON |
| 22. Replace wooden doors | OFF |
| 23. Replace wooden doors in Addition | ON |
| 24. Storm Doors | ON |
| 25. Storm Doors in Addition | ON |
| 26. Window Sealing | ON |
| 27. Window Sealing in Addition | ON |
| 28. Replace single paned windows | ON |
| 29. Rpl single pane windows in Addition | ON |
| 30. Plastic storm windows | ON |
| 31. Plastic storm windows in Addition | ON |
| 32. Glass Storm Windows | ON |
| 33. Glass Storm Windows in Addition | ON |
| 34. Add awnings | OFF |
| 35. Add awnings in addition | OFF |
| 36. Add shade screens | OFF |
| 37. Add shade screens in Addition | OFF |
| 38. Setback Thermostat | ON |
| 39. Tune heating system | ON |
| 40. Evaporative cooling | OFF |
| 41. Tune cooling system | OFF |
| 42. Replace dx cooling equipment | OFF |

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- | | |
|--------------------------------------------|------------|
| 43. Lighting retrofits | ON |
| 44. Refrigerator replacement | ON |
| 45. Water heater tank insulation | OFF |
| 46. Water heater pipe insulation | OFF |
| 47. Low flow showerheads | OFF |
| 48. Water Heater Replacement | ON |
| 49. Replace Heating System | ON |
| 50. Furnace Filters (User Defined Measure) | OFF |

Duct Insulation must be evaluated when ducts are outside of the conditioned space. Ducts must be evaluated for leakage. The Grantee must seal all ducts that have a pressure pan reading above 1 PA.

Faucet Aerators are to be added as a User Defined Measure.

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

Weatherization Assistant 8.9 Items to Note

Atmospheric Draft-hood Equipped Furnaces

In the event that an energy auditor is unable to perform proper diagnostic testing, see attached "NEAT / MHEA Steady State Efficiency (SSE) data input" form for guidance. 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.

Furnace Replacements

In both NEAT and MHEA, furnace replacements that are intended to be an ECM may not be made mandatory and included in SIR. If a furnace is being replaced as an ECM,

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it will follow the order of installation rules for an ECM (See CSPM 606.3). If it is being replaced through H&S, it may be made mandatory but is not to be included in the SIR.

Optional Measures

Grantees may install the identified General Heat Waste reduction measures listed below, known as Optional Weatherization Measures, on one to four-unit dwellings, without a need for justification in a site specific energy audit. Optional 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 total. These measures must provide additional benefit to the client/customer and are not able to be tied to another measure.

An Optional Measure may be skipped for any documented reason (including declined by client). Optional Measures are not prioritized by the energy audit tool and are not turned on inside the audit.

Optional Measures include:

- Water heater tank wrap;
- Water heater pipe insulation; and
- Low-flow showerheads

There are certain items that have been treated as Optional Measures in the past but are no longer considered Optional. They must be addressed in the NEAT/MHEA in the following ways:

- Smart thermostat (Turn ON inside NEAT and MHEA)
- Faucet aerators (Create as a User Defined Measure in NEAT and MHEA)
- Weatherstripping (Include in air sealing)
- Furnace filters (Include in Health & Safety)

Measure Skipping (If Allowable)

NEAT/MHEA may indicate that a measure shall be addressed, but conditions dictate otherwise. Per WPN 19-4, the only conditions where an Energy Auditor may use this discretion is under funding limitations or with comprehensive documentation, including background/source documents that support the decision. “Major Measures” may never be skipped. See “Measure Skipping Clarification” section in CSPM 606.3 for further detail on this acceptability. In cases where it is allowable for a measure to be skipped,

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- If the entry is a price, escalate the measure value to \$9999.00 in “additional costs” (or in MHEA by inserting a “zero” or in some cases “none” in the respective measure screen).
- If the entry is an option of what to consider, choose “none” in the respective measure screen.

Please note, this process is not applicable for furnace replacements.

Leveraging Audit Procedure

Reference DOE WAP Memo 035 for Federal Requirements and CSPM item 622.

- In general, when leveraging funds to reduce the cost of a measure to meet the programs SIR requirement (e.g., furnaces or solar systems), agencies may enter the “discounted” cost for the measure into WA8.9 (as if they were purchasing the item “on sale”), and document the discounted costs and funding sources in the file.
- In all cases include an explanation indicating the use of leveraged funds on the measure and the amount of leveraged funds used in the Comment field of the WA 8.9/NEAT/MHEA measure.
- This approach is appropriate only in cases where the measure or measures being “discounted” remains the last measure in the package of measures being installed.
- When reconciling the Cost Center in WxPro Module, enter the funding source for the leveraged amount as per policy.

Multi-Family Weatherization Audit

An independent energy audit shall be conducted on any multifamily building housing five or more units. The independent audit shall have written preapproval by BCAEO Technical staff and the audit must be DOE approved.

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

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606.2 – PROGRAM REQUIREMENTS – TESTING

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
- NREL Standard Work Specifications (SWS)
- State of Michigan DOE State Plan
- DOE Program Agreement
- Building Performance Institute, ANSI BSR BPI-1200 current version
- Michigan Weatherization Field Guide

PURPOSE

The purpose of this policy is to identify and define technical weatherization testing on homes to ensure 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 2016 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 equivalent (see CSPM 618.1), and a BPI certified Quality Control Inspector. Any final

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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 Energy Auditor and during the Quality Control Inspection by the Quality Control Inspector tested by a licensed mechanical contractor. (Reference BPI-1200 current version standard). Related sections of the SOM approved audit shall be completed. State of MI Mechanical rules and regulations must be adhered to.
- 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 by the Energy Auditor and the Quality Control Inspector for all jobs that include any of the following conditions:

- Any dense packing measure (e.g. wall insulation, floor insulation, sloped ceilings)
- Infiltration measures on an attached (or tucked under) garage
- Air sealing (in conjunction with zone pressure diagnostics)

Proof that infrared scans have been completed must be available upon request by BCAEO. Copies of the thermal images from the scans by the Energy Auditor and the Quality Control Inspector can be kept in the agency's client file and be available upon request by BCAEO staff as proof of completion. Alternatively, the grantee can elect to

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provide other certification documentation in the client file that infrared scans were completed by the Energy Auditor and the Quality Control Inspector.

Pressure Testing

Zone pressure diagnostic testing is required for attics and for attached garages. It is encouraged for other areas of the home as a diagnostic tool. Room pressures during air handler operation must be tested. For details on the process of testing room pressures or performing zone pressure diagnostics, refer to the Michigan Weatherization Field Guide.

Pressure Pan Testing:

Pressure pan testing is required in any homes where ducts are outside of the conditioned space, including all manufactured homes. If the pressure pan reading is above 1 PA on any duct outside the conditioned space for site-built or for manufactured housing, sealing must be performed. For details on the process of pressure pan testing, and sealing ducts, refer to the Michigan Weatherization Field Guide.”

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606.3 – PROGRAM REQUIREMENTS – TECHNICAL WEATHERIZATION INSTALLATION REQUIREMENTS

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
- Weatherization Program Notice 17-7, 19-4
- State of Michigan DOE State Plan
- DOE Program Agreement
- Building Performance Institute, ANSI BSR BPI-1200 current version
- Michigan Weatherization Field Guide

PURPOSE

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

POLICY

All measures installed in the Michigan WAP must meet the following requirements to ensure the safety of the home and to ensure proper weatherization of each home weatherized.

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", or variances approved by DOE for the State of Michigan, as published in the 10 CFR 440 and DOE WPN 19-4. 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).

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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, the Michigan Weatherization Field Guide, and in accordance with the State of Michigan, U.S. DOE 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 resources, if available.

Measures must be installed properly utilizing the Standard Work Specifications outlined in the Michigan Weatherization Field Guide.

Mandatory Health & Safety Measures

- Installation of smoke detectors
 - Client education on appropriate test procedures and intervals to replace the batteries shall be documented.
- Carbon Monoxide (CO) Alarm/Detector are required to comply with ASHRAE 62.2 version 2016 in all residences. CO Alarms/Detectors must be tested to verify operation of installed alarms.
 - 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

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- 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.
- Implementation of program required ASHRAE 62.2 ventilation standard is required.
- Clothes dryers shall be vented to the exterior.

Installation of Energy Conservation Measures

Energy Conservation Measures (ECMs) must be installed in the order of decreasing Savings to Investment Ratio (SIR), starting with the highest and ending with the with the lowest SIR of 1.0 or greater. “Measure skipping” is defined as follows: Not installing, in order of decreasing SIR, the cost-justified ECMs and related Incidental Repairs Measures (IRM) included in the work scope produced by the Department of Energy (DOE) approved energy audit tool (NEAT/MHEA). Measure skipping is generally not allowed in the WAP. For further details on Measure Skipping, see Measure Skipping Clarification section of this CSPM.

LED Bulbs

LED Bulbs shall be used to replace existing incandescent light bulbs only. Annual energy savings will be based on a three hour usage per day.

- LED bulbs must be omni-directional
- LED bulbs must be soft- or warm-white to provide the hue similar to incandescent bulbs (unless client requests brighter light)
- All LED bulbs installed must be ENERGY STAR® (version 2.0) rated
- LED bulbs installed in a dimmable socket must be designed to work with traditional dimmer switches
- LED bulbs installed in an enclosed housing must be approved for recessed or enclosed spaces

LED bulbs will be installed with client permission in each house.

LED bulbs must be installed where instructed in work order. Weatherization workers may not leave the bulbs with the client to install.

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Order of Measure Installation

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. Air sealing.
3. Insulation measures.
4. Remaining audit measures in order of decreasing SIR.

Measure Skipping Clarification

- **Measure Skipping**
“Measure skipping” is defined as follows: Not installing, in order of decreasing Savings to Investment Ratio (SIR), the cost-justified Energy Conservation Measures (ECMs) and related Incidental Repairs Measures (IRM) included in the work scope produced by the Department of Energy (DOE) approved energy audit tool (NEAT/MHEA).
- **Major Measure**
“Major Measure” is defined as follows: A high priority measure, which if skipped, would result in “partial” weatherization of a unit. Major measures are as follows: air sealing, duct sealing of ducts outside the thermal boundary, attic insulation, wall insulation and floor or belly insulation.
- **Measure Skipping of cost-justified major measures is not permitted at any time.**
- **Alteration of the cost-justified work order must be addressed in the following ways for the following situations:**
 - **Funding Limitations:**
If all funds available to be spent on the job will not cover the entire work scope, then measures may be removed from the work order starting with the lowest SIR measure and working up the list from there. The work order must remain overall cost-effective or the job must be deferred. Necessary Health and Safety (H&S) measures may NOT be removed from the work order; however, ECMs can be removed.
 - **Prior to work beginning:**

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- **Client education** is important to inform a client of planned measures and material use. Resistance from a client to install any measures and/or materials planned as a result of NEAT/MHEA created work order should be addressed with either additional education and/or re-running the energy 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 auditor should again explain and discuss the situation with the building owner or occupant.
 - **If the building owner or occupant still declines a measure, not defined as a major measure**, the auditor must include in the client file a comprehensive justification, including background/source documents that support the decision to skip a specific measure. All other weatherization measures must be installed.
 - **If the auditor cannot access background/source documents that justifies the building owner/occupant’s decision to decline a measure or the measure is defined as a “major measure”**, the situation must be fully documented in the client file and the job must be deferred due to client refusal.
- **Inadequate training:**
A lack of training for Grantees is not an allowable reason to skip measures. Standard procedure should be to postpone job(s) requiring priority measures that cannot be installed due to lack of trained staff until adequate training is acquired.
- **After a job has begun:**
Due to scheduling, measures are sometimes installed with a lower priority first. If during the installation process, the client declines a higher priority measure, work must stop at the time the client declined the higher priority measure. No further installation is allowed and the job must be inspected by a Quality Control Inspector (QCI) and closed out as a completed unit. This should be clearly explained in client file documentation. Some agencies include a statement for client signature that states the client is aware and accepts all WAP rules, including the specific services and measures determined by an energy audit.

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- **Optional Measures**
 The Optional Measures may be skipped for any documented reason (including declined by client). Optional measures are not prioritized by the energy audit tool. The Optional Measures are listed in the “Optional Measures” section of CSPM 606.1.

Fuel Switching

The Weatherization Assistance Program (WAP) does not permit the general practice of non-renewable fuel switching when replacing furnaces/appliances. However, DOE does allow the changing or converting of a furnace/appliance using one fuel source to another on a limited, case-by-case basis. These approvals will only be granted when all related costs demonstrate the effectiveness of the fuel switch over the life of the measure.

BCAEO reviews and approves the case-by-case fuel switch requests. Grantees must submit each request to MDHHS-BCAEO@Michigan.gov with required submission support and BCAEO will review the submitted information and determine the approval. See CSPM 610 for details on fuel switch submissions to BCAEO.

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606.4 – PROGRAM REQUIREMENTS – FIELD GUIDE UPDATES

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
- Building Performance Institute, ANSI BSR BPI-1200 current version
- Michigan Weatherization Field Guide
- Standard Work Specifications (SWS)

PURPOSE

The Michigan Weatherization Field Guide was approved on July 5, 2018. The Field Guide is valid for 3 years from the approval date. The purpose of this policy is to identify any updates that need to be made in the Field Guide that will be anticipated in the next version. Edits identified in this CSPM supersede language in the published Michigan Weatherization Field Guide.

POLICY

All measures installed in the Michigan WAP must meet the NREL SWS or variances approved by DOE for the State of Michigan. These SWS and variances are outlined in the Michigan Weatherization Field Guide. After the Michigan Weatherization Field Guide's approval, some items may be identified as not matching the SWS or variances for the State of Michigan. Adjustments to Field Guide items are identified in this document and will be anticipated updates for the next published version of the Michigan Weatherization Field Guide.

Updates

1.8 Electrical Safety (Page 46 of PDF)

*In bulleted list, **add** the following bullet:*

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If aluminum wiring is present, work on the home will be stopped until the suspect wiring is inspected and determined to be safe by a licensed electrician. After the weatherization work is completed, wiring will be re-inspected by a licensed electrician.

4.2.11 Knee-Wall Insulation (Page 155 of PDF)

*In bulleted list, **add** the following bullet after the first bullet:*

In instances where fiberglass insulation currently exists in the kneewall, and no air barrier is present, it is recommended to install housewrap over the existing insulation to allow the insulation to perform as rated.

4.2.2 Safety Preparations for Attic Insulation – Knob-and-Tube Wiring (Page 140 of PDF)

***Replace** current section with the following:*

The Energy Auditor, during the audit process, will determine if knob and tube wiring exists in the home. All existing knob and tube wiring will be tested to determine if it is live utilizing, at a minimum, a non-contact voltage tester.

Best practice approach to existing, live knob and tube wiring is to have the wiring decommissioned. For specific information regarding this approach, please reference “Decommissioning Knob-and-Tube Wiring” on page 47 of the Michigan Weatherization Field Guide.

Live knob and tube wiring being left in service should receive a voltage drop test to determine if insulation can be added to the attic or if the home should be deferred. Damming of live knob and tube wiring is allowed. The damming material shall be rigid and non-conductive. Proper clearances between the attic insulation and the knob and tube wiring shall be maintained in accordance with the National Electric Code or the authority having jurisdiction. The damming material shall be installed to be taller than the finished depth of insulation and the top of the damming channel shall be left open. Where proper clearance allows, insulation should be installed between the attic floor and the knob and tube wiring. Live knob and tube wiring can never be covered by insulation.

Wall cavities that contain knob and tube wiring will not be insulated.

6.2.1 Garages Underneath Living Areas

***Change** title of section to:*

6.2.1 Garages Underneath Living Areas and Attached Garages

6.3.1 Rim-Joist Insulation and Air-Sealing (Pages 206-207 of PDF)

***Add** sentence to the end of the paragraph crossing pages 206 and 207:*

Habitable space is defined in alignment with the definition in the IRC R202.

***Add** after last paragraph on page 207:*

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Alternatively, cellulosic fiber insulating board may be used if it has a factory or field applied class II vapor retarder in full contact with the interior facing side. This must be installed tightly to the wood and sealed at all edges.

6.3.4 Crawl-Space Wall Insulation (Page 212 of PDF)

Add first bullet:

Insulation will be installed to the highest SIR justified R-value.

Replace second bullet on list on page 213:

Expanded or extruded polystyrene foam board

8.13.3 Unbalanced Supply-Return Airflow Test (Page 328 of PDF)

*In bulleted list, **remove** all of item 2:*

Measure the bedrooms' pressure difference with reference to outdoors.

*In bulleted list, **remove** word "or" in item 3:*

You can measure the pressure difference between the central zone and the bedroom.

Remove entire chart on page 328.

10.8 Water Heater Installation (Page 461 of PDF)

*In bulleted list, **replace** bullets 1 and 2 with the following bullets:*

- Replacement and existing water heaters must have a pressure and temperature relief valve. The pressure and temperature relief valve must be equipped with the discharge line that terminates 1 to 6 inches above the floor.
- The discharge line must be made of rigid, high temperature material designed to meet both the pressure and temperature ratings of the relief valve. The discharge line must be the same diameter as the relief valve outlet and cannot be threaded at the termination at the floor.

Glossary (Page 564 of PDF)

Replace Habitable Space definition:

Habitable Space: Any space within the thermal and pressure boundary, with the exception of closed crawlspaces.

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607 – INCIDENTAL REPAIRS

REFERENCES

- U. S. Department of Energy (DOE) Weatherization Program Notice (WPN) 19-5
- U.S Department of Energy (DOE) Weatherization Program Notice (WPN) 19-4 (including Attachments)
- Michigan Weatherization Field Guide
- 10 CFR 440.3

PURPOSE

DOE has identified inconsistencies in State and agency interpretation of DOE policy concerning the classification of an Incidental Repair Measure (IRM)ve. The following statutory provisions and regulations apply to IRMs, including roof repairs and window or door repair and replacements:

- Per 42 U.S.C.§ 6861(b) the weatherization program’s purpose is “...to increase the energy efficiency of dwellings owned or occupied by low-income persons, reduce their total residential energy expenditures, and improve their health and safety...”
- 10 CFR 440.3 defines Incidental Repairs as “...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 weatherstripped and providing protective materials, such as paint, used to seal materials installed under this program.”¹⁰ CFR 440.21(d) states further that “[e]xcept for materials to eliminate health and safety hazards allowable under §440.18(c)(15), each individual weatherization material and package of weatherization materials installed in an eligible dwelling unit must be cost-effective...[and] must result in energy cost savings over the lifetime of the measure(s)...”

Grantees and Subgrantees are reminded that the WAP is not a rehabilitation or general repairs program. This guidance strictly prohibits stand-alone 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 Subgrantee must use other sources of funding to cover these costs. The IRM category is reserved for repairs

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that are not part of an Energy Conservation Measure (ECM), but are necessary to protect a newly installed ECM.

POLICY

Incidental repairs must be justified by written and photo documentation in the client file.

An Incidental Repair Measure (IRM) is defined as a repair necessary for the effective performance or preservation of newly installed weatherization materials, but not part of a standard installation. IRM installations must be associated with a specific Energy Conservation Measure (ECM) or group of ECMs. IRMs must be justified by written and photo documentation in the client file. IRM costs must be included the SIR calculation of the total package of weatherization measures. The total costs of all IRMs is added to the cost of the package of weatherization measures to calculate the whole unit SIR (CSIR).

The primary goal of the Weatherization Assistance Program is "...to increase the energy efficiency of dwellings owned or occupied by low-income persons..." IRMs must be limited to those minor repairs necessary for effective performance or preservation of energy conservation measures installed by the Subgrantee. WAP funds shall not be used to install IRMs solely to protect existing materials in the dwelling.

DOE policy relating to the inclusion of IRMs in the package of weatherization measures is summarized as follows:

- Justification for the cost of each IRM and why it is necessary for the effective performance or preservation of an ECM must be documented in the client file with photos and written explanation.
- The total cost of the package of weatherization measures including any IRMs must have a calculated SIR of 1.0 or greater.

For questions related to instances where necessary IRMs bring the SIR of the total package of measures below 1.0, or issues related to "measure skipping" see the most recent Guidance on the topic (CSPM 606.3).

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.

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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.

See section 4.0 of the Health & Safety Plan for details on Health & Safety related items that will be installed as Incidental Repair Measures under certain circumstances.

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608 – RENTAL UNIT AND MULTIFAMILY WEATHERIZATION

REFERENCES

- 10 CFR Part 440, Weatherization Assistance Program (WAP) for Low-Income Persons
- Weatherization Program Notice 16-5, 16-6, 17-4, 19-1
- WAP Memo 016 & 035
- 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.

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

- (i) The benefits of weatherization assistance in connection with such rental units, including units where the tenants pay for their energy through their rent, will accrue primarily to the low-income tenants residing in such units;
- (ii) For a reasonable period of time after weatherization work has been completed on a dwelling containing a unit occupied by an eligible household, the tenants in that unit (including households paying for their energy through their rent) will not be subjected to rent increases unless those increases are demonstrably related to matters other than the weatherization work performed;
- (iii) The enforcement of paragraph (b)(3)(ii) of this section is provided through procedures established by the State by which tenants may file complaints, and owners, in response to such complaints, shall demonstrate that the rent increase concerned is related to matters other than the weatherization work performed; and
- (iv) No undue or excessive enhancement shall occur to the value of the dwelling units.

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POLICY:

Prioritizing Weatherization Work

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.

Since Michigan does not currently have an approved multifamily energy audit tool, all multifamily projects (5+ single family units) may not proceed without prior BCAEO or DOE approval. If an agency is interested in conducting a multifamily project, contact the BCAEO Weatherization Specialist.

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

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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.

Multi-Unit Restrictions

If a multi-unit building is not determined eligible, no single unit may be weatherized.

Example: In a ten unit building there are four eligible units and six ineligible units. Weatherization cannot be performed in any of the ten units.

Multi-unit Buildings as identified by the Department of Housing and Urban Development (HUD), the Department of Agriculture (USDA) and Low Income Housing Tax Credit (LIHTC):

Beginning in calendar year 2017, HUD will no longer be updating the online lists (as in previous years), therefore, WAP will no longer use them. HUD will qualify 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.

The rule expressly indicates that income qualified public housing, assisted housing, LIHTC properties, and properties with USDA guaranteed loans 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. The certification procedures outlined in this Guidance do not apply to LIHTC properties, or for properties with USDA guaranteed loans. The LIHTC and USDA lists of income-eligible properties are no longer valid and will no longer be updated; WAP providers should follow standard procedures for verifying individual resident incomes for USDA and LIHTC properties.

To ensure that a multifamily building meets the income eligibility requirements set by DOE pursuant to the certification process established by HUD, property owners and managers shall submit two documents to HUD: 1) a **Property Self-Certification Form** that specifies that the building in question meets DOE's income eligibility requirements and, 2) a **Property**

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Occupancy Report from current property records that confirm compliance with DOE's income eligibility requirements.

Property Certification Procedure

1. Property Self-Certification Form

The property owner or authorized agent of the property must sign a Self-Certification format testing that:

- The property owner or authorized agent maintains certified income records for households residing at the property.
- The property owner or authorized agent has reviewed its current certified income records.
- The property owner or authorized agent has determined that at least 66 percent of the units in each building (or at least 50 percent of the units for 2- and 4-unit buildings) have certified incomes that are at or below 200 percent of the current federal poverty level based on household size.
- The property owner or authorized agent certifies that all the information provided with the certification request is true and accurate.

A multifamily property certification form is attached for use by property owners or authorized agents.

2. Property Occupancy Report

The property owner or authorized agent must also complete and submit an Occupancy Report for the property.

A **Multifamily Occupancy Report** worksheet file is attached to this CSPM for completion by property owners or authorized agents. The file contains a Property Information worksheet and Building-Unit worksheets that must be completed for each building. The income information requested should be available from standard occupancy reports prepared for the property.

Required property information includes: property name, HUD contract number, contract expiration date, other property identification number (if applicable), property address and the number of buildings and units that are at the property and that meet DOE's income requirements.

Required building-unit information includes a listing of all units and information for each units including: building identification, building address, certified annual income, household size, and whether the household income was certified in the last year.

Upon completion of the Property Certification and the Multifamily Occupancy Report, the property owner (or property owner's representative) will submit both files to BCAEO. BCAEO will in term submit the files to HUD and DOE.

3. HUD Review

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- HUD will review the certification and accompanying documentation for completeness. If the documentation submitted by the property owner is insufficient for HUD to complete its review, HUD will notify the property owner via e-mail that the request cannot be approved based on the information submitted.
- HUD will review the household and property information provided under the self-certification process with records maintained by HUD, and may request additional occupancy information subject to Federal requirements.
- If the documentation is complete and one or more of the buildings at the property meet DOE's income eligibility requirements, HUD will designate the property or list of qualified buildings as income qualified properties/buildings, and will notify DOE and the building owner.
- HUD will at the same time provide DOE with a list of the income-certified buildings pursuant to the above procedures; DOE will post these lists on its web site as required by 10 CFR 440.22(b)(1), 440.22(b)(2), and 440.22(b)(4).
- Buildings determined by HUD to be eligible for WAP assistance will be posted on one of two lists:
 - List 1 –Public housing buildings or privately-owned buildings with three or more years remaining on their affordability contracts with HUD are included on this list. As outlined in the January 2010 Final Rule, inclusion on List 1 demonstrates compliance with the following three WAP multifamily program requirements: (1) DOE's income requirements; (2) protection against rent increases; and (3) protection against undue enhancement of the weatherized building.
 - List 2 –Buildings on this list have less than three years remaining on their Housing Assistance Payments (HAP) contract with HUD. As outlined in the January 2010 Final Rule, inclusion on List 2 demonstrates compliance with only the following two multifamily program requirements: (1) DOE's income requirements; and (2) protection against undue enhancement of the weatherized building. Buildings on this list must separately comply with the WAP program requirement for protection against rent increases.

Rehabbed Multi-Unit Buildings

Weatherization funds may be used to weatherize a dwelling being rehabbed such as Habitat for Humanity rehabs or MHSDA rehabs (cannot be used on new construction) if the dwelling fits the following:

1. The households have been determined eligible; and
2. The subgrantee is meeting or exceeding all the goals for elderly, disabled (or the household falls into one of these categories); and
3. The waiting list of eligible applicants is followed based on the priorities established by the subgrantee. These units cannot be given a priority just because they are a part of a rehab program.

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Multi-Unit Restrictions

If a multi-unit building is not determined eligible, no single unit may be weatherized.

Example: In a 10-unit building there are four eligible units and six ineligible units weatherization cannot be performed in any of the ten units.

Any potential multi-unit projects will be presented to the DOE Project Officer for approval.

Documentation Requirements

Table 1: Documentation Requirements

Documentation	Required?
Building Owner Permission	Yes
Income Eligibility Documentation	Yes (if on HUD list, follow the Property Certification Procedure process outlined above)
Demographics of Residents	Yes
Accrual of Benefits to Tenants ¹	Yes, if applicable
Audit Runs	Yes
Leverage/Buy-Down Agreements	Yes, if applicable

¹If 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. The subgrantee 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 copy and explanation of all relevant agreements must be signed by the tenant receiving weatherization services upon the agreements' completion.

Income Eligibility

Except in cases when HUD approval has been granted, 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) approved/qualified by HUD, follow the Property Certification Procedure process outlined above.

All Other Units

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For multi-unit buildings that do not fall under the two categories above, individual applications, and income eligibility verifications must be obtained for each unit. This information must be included in all client files. See CSPM Item 601 for Income Eligibility Guidelines. See CSPM Item 612 for client file requirements.

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. See CSPM 611 for guidance on client priority selection criteria. 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.

Generally, resident demographics must be reported on a unit-by-unit basis. However, in some cases, buildings with HUD approval may collect rent rolls or other such building owner records provided on an entire building or project basis may be sufficient documentation to meet this requirement. This will be determined when the request is made by the Grantee. 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 two 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);

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- 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.

Grantee’s 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	Yes	Yes

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weatherization, to heat and hot water distribution, and ventilation, to improve the comfort of residents		
Establishment of shared savings program	Maybe- requires description	Yes

Audit Runs

Michigan does not currently have an approved energy audit for multifamily weatherization. Multifamily projects will be conducted on a case-by-case approval basis and at that time, the appropriate energy audit tool will be agreed upon. In multifamily weatherization, 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 bought 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 bought-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.

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In addition, landlords may contribute to the weatherization of their buildings (for detailed information on landlord contributions, see CSPM 608.3). 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 in multifamily (including 2-4 unit) weatherization. Funding sources other than landlord contributions may also be used for buy-downs. Buy downs are only allowable in multifamily weatherization; but, leveraging funds may be done in both single family and multifamily weatherization. For further information on buy downs and leveraging, see CSPM 622.

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 individual SIR of 1 or greater as a stand-alone measure. This must be approved by BCAEO. However, in order for the measures 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 of 1 or greater.

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 DOE 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 CSIR of the job, 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 a CSIR ≥ 1.0 .

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 the CSIR would be greater than or equal to 1.0 when including the pre-buy-down cost of the measure (and of course the post-buy-down DOE package CSIR would increase as well).

In the second case the replacement windows would not be eligible for a buy-down in

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WAP because the pre-buy-down *package* CSIR 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 and 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.

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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

See CSPM 622 for further information on buy downs and leveraging.

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608.1 – SHELTERS, GROUP HOMES AND TRANSITIONAL LIVING FACILITIES

REFERENCES

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

Department of Energy Weatherization Program Notice (WPN) 16-5

PURPOSE

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

DOE WPN 16-5 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 and residents of the dwelling units meet prescribed building and income eligibility requirements. Prior, written approval by the MDHHS BCAEO staff is required for the weatherization of any shelter, group home or transitional facility. The documentation materials included below should be submitted to

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the MDHHS-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

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- 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 measurable 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.

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: MDHHS-BCAEO@michigan.gov with a copy to the grant manager.

File Documentation

Job files must include all applicable client file information required in CSPM 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.

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- 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 MDHHS BCAEO staff for the weatherization of any shelter, group home or transitional facility

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608.2 – LANDLORD AGREEMENT

REFERENCES

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

BACKGROUND

10 CFR Part 440.22(b) (1) states: A subgrantee may weatherize a building containing rental dwelling units where the subgrantee has obtained written permission of the owner or his agent.

10 CFR Part 440.22 (b)(3) states: The Grantee has established procedures for dwellings which consist of a rental unit or rental units to ensure that:

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

POLICY

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.

The landlord agreement on the following pages may be used or the Grantee may utilize its own document. Any Grantee customized document must contain the information on the sample agreement provided.

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608.3 – LANDLORD CONTRIBUTIONS

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

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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.

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609 – DEFERRAL POLICY

REFERENCES

DOE Weatherization Program Notice 19-1 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. The written deferral policy must outline the procedures to be followed when making a deferral decision and to notify the customer. It should include guidelines for establishing a time period for correction and an identification of resources and options to assist the applicant. Grantees must also include a list of potential reasons for deferral, which may not be all encompassing, as deferral reasons may be conditional or compounded by multiple issues.

Conditions where Grantee must not weatherize include:

- The dwelling was weatherized after September 30, 1994
- The building or dwelling unit is scheduled for demolition/redevelopment.
- The condition of the structure would make weatherization impossible or impractical (e.g. inability to meet SWS)
- Per WPN 19-4, client refusal of any cost justified major measure. Agencies should make every attempt possible to educate clients around cost justified measures they are refusing. See CSPM 606.3 for further information on measure skipping.

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- Per WPN 19-4, if the building owner or occupant declines a measure not defined as a major measure prior to work beginning, the auditor must include in the client file a comprehensive justification, including background/source documents that support the decision to skip a specific measure. All other weatherization measures must be installed. If the auditor cannot access background/source documents that justifies the building owner/occupant's decision to decline a measure or the measure is defined as a "major measure", the situation must be fully documented in the client file and the job must be deferred due to client refusal. See CSPM 606.3 for further information on measure skipping.
- Encountering a mandatory reason for deferral as outlined in the Health and Safety plan (CSPM 614).

Grantees may defer in certain situations

There are conditions or situations when an eligible dwelling unit should not be immediately weatherized. A determination may become evident during the eligibility process, during the audit or after work has begun. The decision to defer work in a dwelling is difficult, but at times necessary. This does not mean that weatherization assistance will never be available, but that work should be postponed until the problems can be resolved and/or alternative resources are found.

Grantees are expected to pursue reasonable options on behalf of the dwelling owner, and to use good judgment in dealing with difficult situations. If the unsafe conditions cannot be corrected by the Grantee due to funding constraints, cost limitations or because the complexity of the problem is considered beyond the scope of the weatherization; alternate funding should be recommended.

Grantees shall not simply defer service without pursuing other options and identifying other resources to address the identified hazard(s). Whenever appropriate, educational information on how to address the hazard shall be shared with the occupant. If corrections are made on a deferred dwelling that corrects the issue that led to the deferral, the Grantee may proceed with weatherization. Grantees are asked to maintain a list of deferred dwellings for that purpose.

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Grantees may elect to defer a home from receiving weatherization services where health and safety hazards exist for the staff, contractors or clients, or where conditions that cannot be addressed by WAP prevent the safe and effective implementation of weatherization measures.

Conditions where a Grantees may defer, include, but are not limited to:

- 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.
- If owners refuse cost effective measures as determined by the Weatherization Assistant (WA) software tool, Grantees must defer that dwelling per WPN 19-4 , see CSPM 606.3 for further details on Measure Skipping.
- The home receives HUD funding and at the time of completion, the unit will not meet applicable HUD Lead Based Paint standards.
- The extent and condition of lead based paint in the house would potentially create further health and safety hazards.
- The building structure or its mechanical systems, including electrical and plumbing, are in such a state of disrepair that failure is imminent, and the conditions cannot be resolved cost effectively.

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- The house has been condemned or electrical, heating, plumbing, or other equipment has been "red tagged" by local or state building officials or utilities and the conditions cannot be resolved with WAP funds.
- Electrical or plumbing hazards or structural failures that cannot be addressed/completed within Incidental Repair or Health and Safety (H&S) cost limitations.
- Standing water, remnant of standing water issues, mold, friable asbestos, deteriorated lead based paint surfaces, or other hazardous materials that cannot be addressed by the weatherization work.
- Moisture problems are so severe they cannot be resolved under existing health and safety measures and with minor repairs.
- Dangerous conditions exist due to high carbon monoxide levels in combustion appliances and cannot be resolved under existing health and safety measures.
- In the judgment of the energy auditor, any condition exists which may endanger the health and/or safety of the work crew or subcontractor, the work should not proceed until the condition is corrected.
- The cost to weatherize a home is so significant that it will negatively impact the Grantee's ability to meet the statewide average cost per dwelling (e.g. those homes that are more than 2x the state average). BCAEO must be notified in writing prior to deferring a dwelling for this reason.
- The client is uncooperative, abusive, or threatening to the crew, subcontractors, auditors, inspectors, or others who must work on or visit the house. Threat(s) of violence or abusive behavior to worker(s) or household member(s) during the weatherization process.
- The client/occupants has known health conditions that prohibit the installation of insulation and other weatherization materials.

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

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. If the measure is allowable in weatherization and determined to be necessary for the job, weatherization funds may be used to correct the condition. Please see CSPM 614 and the Michigan Health & Safety Plan for details on weatherization allowability.

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 federally funded.

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. In cases where an individual client feels a deferral is unfairly determined, the individual client may appeal a decision to defer.

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.

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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.

All deferrals and the reason for the deferral must be documented in FACSPRO WxPRO Module under the notes section of the deferral queue.

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610 – FUEL SWITCHING POLICY

REFERENCES

- 10 CFR Part 440, Weatherization Assistance Program (WAP) for Low-Income Persons
- Weatherization Program Notice 19-4

PURPOSE

To provide agencies guidance in allowability and process for fuel switching requests.

POLICY:

BCAEO conducts State Administered Fuel Switching Approval. Fuel switching is allowable when the site-specific energy audit demonstrates the cost effectiveness of the fuel switch over the life of the measure as indicated by the Savings to Investment Ratio (SIR). Fuel switching is also allowed when justified for Health and Safety (H&S) reasons.

BCAEO was granted permission to conduct state level approval of fuel switches based on a demonstrated methodical review process. Therefore, all agencies in Michigan's WAP must follow the process as outlined below, and receive approval from BCAEO, before conducting a fuel switch.

Fuel Switch Request Submission

To submit a fuel switch request, an agency must upload the following items into its agency SharePoint library.

- MDB file containing
 - Measures report
 - Input report
 - Fuel cost library
- IWC
- Photos of exterior of the dwelling
- Photos of the existing heating system
- Sketch of the dwelling including measurements
- Quote from the mechanical contractor for the new heating system including all hookup fees

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- Justification for fuel switch either being H&S or as energy savings

The agency must also email a notification to MDHHS-BCAEO@michigan.gov noting that a fuel switch is being requested and the above documents have been uploaded into SharePoint.

If a heat pump or other combined heating-and-cooling system is to replace a heating-only (or cooling-only) system, no savings will be attributed to the previously non-existent cooling (or heating) system, but all the costs of running the system throughout the year will be included in the audit.

Other Appliances Attached to Fuel Source

BCAEO will consider fuel switch requests based on an SIR or H&S for heating systems and/or water heaters. If another appliance, such as an oven, stove or dryer are affected by the fuel switch request, BCAEO will take that into consideration during the review. If the fuel switch is deemed necessary or cost effective for the intended appliance, BCAEO may permit the agency to replace or convert the other affected appliance(s) with a non-DOE funding source.

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Community Services Policy Manual	SUBJECT: Weatherization Assistance Program CLIENT PRIORITY SELECTION CRITERIA		EFFECTIVE DATE 7/1/2020 ISSUE DATE 6/28/2017

611 – CLIENT PRIORITY SELECTION CRITERIA

REFERENCES

- Department of Energy, 10 CFR Part 440.16
- Weatherization Program Notice 20-1
- Weatherization Assistance Program Memorandum 002
- Michigan Public Service Commission, Michigan Energy Appraisal Winter Outlook 2019/2020

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

Grantees are 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. The priority point system does not differentiate between eligible households that rent or own their dwellings. Each category is 1 point.

Mandatory and allowable priority categories are as follows:

- Elderly Units (defined in 10 CFR 440 as an individual who is 60 years of age or older)
- Disabled Units
- Households with children (defined as an individual below the age of 19)
- 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 projection 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.

https://www.michigan.gov/documents/mpsc/ea-winter19_671642_7.pdf

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 midpoint (Column D) the household is eligible for a priority point in this category.			
Column A	Column B	Column C	Column D
Heating Fuel Type	Normalized Midpoint	Measure	10% above Midpoint

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	Projection		
Natural Gas	81	Mcf	89
Heating Oil	520	Gallons	572
Propane	635	Gallons	698

- 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.

Grantee Prioritization

Grantees determine how to best serve the eligible population in their service territory. Grantees may choose to use oldest eligibility date for positioning applicants with the same number of priority points.

Applicants with no priority points remain at the end of the waitlist and will be served, oldest eligibility date first, after all applicants with one (1) or more points are served. Grantees are required to have a written policy of their prioritization system. Grantees may not discriminate on service date due to the housing type of the client.

It is permissible to pull a client from the priority list out of order to engage with a leveraging opportunity, if the following guidelines are followed:

- Client is part of a group with an equal number of points at or near the top of the lists and
- Leveraging opportunity is rare and
- Subgrantee can defend the selection of the client for leveraging over other clients on the list.

When the Grantee's territory covers a large geographical area, it is also permissible to prioritize service based on cost effective scheduling considerations. For example, if a prioritized client lives in a county distant from the main offices, other homes in that area on the waitlist may be served during the same time period, if it eliminates costs and travel time for the agency.

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612 – APPLICANT FILE DOCUMENTATION

REFERENCES

- 10 CFR Part 440, Department of Energy (DOE) Weatherization Assistance for Low Income Persons Program Regulations.
- WPN 17-7, WPN 19-5
- WAP 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 (See CSPM 601 for additional eligibility policy)

- 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. Actual social security cards are not required to be kept in the file but the social security numbers must be entered into FACSPRO.
- Signed FACSPRO Weatherization disclaimer. If using DHS-4283, agency must have a disclaimer that matches the FACSPRO Weatherization disclaimer for the

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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)
- Per WPN 17-7, the rationale for performing each Health & Safety measure in an individual home and its relationship to the energy conservation measure (ECM) that necessitated it must be clearly documented in the client file.
- Per WPN 19-5, justification for the cost of each incidental repair measure (IRM) and why it is necessary for the effective performance or preservation of an ECM must be documented in the client file with photos and written explanation.
- Utility usage documentation for the 12 months before weatherization work begins and for the 12 months after a job is completed collected and entered into FACSPRO's Customer Intake Energy Tab. **Note:** The cost per unit must be calculated manually and will fluctuate from one month to the next.
- 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.

Application

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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. In WxPro, this date defaults to the date that the client action plan is created. 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.

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, the redetermination of a household's eligibility, must occur at least every 12 months from the eligibility date, if the energy audit has not yet been initiated. This date must be within 30 calendar days from the date all documents needed for eligibility determination are received. In WxPro, this date defaults to the date that the client action plan is created and appears as the "Eligibility Determination Date" in the queues screens.

Applicant Notification

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

1. Applicant name, address and date
2. The determination decision on program eligibility

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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.

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
- Michigan Weatherization Program Health & Safety Assessment Findings, DHS-552
- Release of Liability and Waiver of Claims, DHS-552-A (See CSPM 617)
- Weatherization Assistance Program Client Inspection/Assessment, DHS-1008
- Signed radon informed consent form
- 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
- The following items must be included as a part of the energy audit:
 - A completed IWC, including;
 - ASHRAE
 - Preferred location of where the fan should be installed
 - CFM Requirements
 - Indication if continual use
 - Control switch location and preference
 - Will new wiring be needed?

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- Lighting Systems
 - Number of bulbs
 - Suggested locations of where the bulbs should be installed
- Target goal for Blower Door CFM*
- Pressure Diagnostics Tab
 - Pre-inspection pressure diagnostics numbers for attics, garages, and room pressures in homes with forced air heating systems
 - Pressure pan (if ducts outside the thermal boundary)
 - Pre measurements – collected by EA*
 - Zone Pressure testing
 - Pre numbers – collected by EA*
 - Room pressures
 - Pre numbers – collected by EA*
- *The QCI must provide post measurements on the blower door and the Pressure Diagnostics Tab
- Infiltration Details
 - In Weatherization Assistant, on the Air and Ducts Leakages tab under Ducts and Infiltration, list, at minimum:
 - Location of major air leaks
 - Estimated size of any large openings
 - Materials to match, if appropriate
 - Details for addressing chimneys properly, if applicable; and
 - Details for addressing hatches, if applicable
 - Completed Work Order from FACSPRO
 - Drawing of house that:

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- Identifies room labeling and corresponds with work order
 - Shows measurements on diagram for proper square footage calculations and verification
 - Identifies windows and doors on all sides of drawing
 - Establishes the thermal and pressure boundary
- 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
 - All invoices relevant to the job (may include general contractor, mechanical contractor, subcontractor, refrigerators, etc.)
 - Specifications on any sprayfoam used on the project (air sealing or insulation)
 - Certificate of Insulation, when applicable
 - LRRP Documentation when applicable
 - Any drawings, spreadsheets, WA8 Data sheets, field notes, or other information utilized in conjunction with completion of the SOM approved audit.
 - All photos that document conditions of unit being weatherized supported by a CSPM-required Notice (e.g., Asbestos or Potentially Unsafe Conditions)
 - If no Lead Safe Work Practices (LSW) required, documentation of why LSW was not required in the Notes section of WxPro.

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Documentation shall be maintained by 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 must 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 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:

- All sides of house
- 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

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- Photos that show anything out of the ordinary (e.g. large bypasses in attic, crawlspace clutter, etc.)

Multi-Unit File Documentation

For multi-unit weatherization jobs, the file must include a completed 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-unit building and must be cross referenced with all other units weatherized in the building. Additionally, all client files 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 weatherization work to that multifamily 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.

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612.4 – APPLICANT FILE DOCUMENTATION – CLIENT ENERGY EDUCATION

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.

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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.

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- 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.

Inspection

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.

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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.

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613 – MAXIMUM AVERAGE COST PER UNIT

REFERENCES

- U.S. Department of Energy (DOE) –Weatherization Program Notice 19-1, 20-1
- WAP Agreement

PURPOSE

To identify the allowable maximum average cost per unit (ACPU) for Program Year (PY) 2019 and PY 2020.

Grantees are expected to maintain an average cost per unit at or below the maximum allowable 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.

Due to the COVID-19 Pandemic, Michigan opted to maintain the PY19 and PY20 as one budget period. For that reason, the ACPU will be considered for that entire period. The Weatherization Assistance Program maximum allowable average is \$7,669 for the program year July 1, 2019 through June 30, 2021.

POLICY

Grantees are expected to maintain an average cost per unit at or below \$7,669. Support, labor, and materials costs are always 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.

Note: The adjusted average for renewable energy measures is not a separate average, but part of the overall adjusted average expenditure limit of \$7,669.

*Vehicle purchases are also included in the calculation of the average cost per unit. To the extent possible, BCAEO will count this category toward the statewide average cost per unit but will allow flexibility on this category in counting toward the Grantee's average cost per unit. If the vehicle purchase category will put the statewide average

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cost per unit over the maximum allowable limit, the individual agencies who have costs in this category will need to amortize the vehicle over multiple program years to reduce the immediate statewide average cost per unit.

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Community Services Policy Manual	SUBJECT: Weatherization Assistance Program HEALTH AND SAFETY		EFFECTIVE DATE 7/1/2019 ISSUE DATE 6/28/2017

614 – HEALTH AND SAFETY

REFERENCES

- Department of Energy Weatherization Assistance Program State Plan
- WAP Agreements
- DOE Weatherization Program Notice 17-7, WPN 17-7 Table of Issues, WPN 17-7 Attachment A
- Michigan Weatherization Field Guide

PURPOSE

The State Plan for the Weatherization Assistance Program (WAP) addresses health and safety (H&S) provisions. The attached Health & Safety Plan provides for health and safety guidelines.

POLICY

Allowable energy related H&S actions are those actions necessary to maintain the physical well-being of both the occupants and weatherization workers where:

- Costs are reasonable, as determined by DOE, and are in accordance with the Health & Safety Plan, attached to this CSPM; and
- The actions must be taken to effectively perform weatherization work; or
- The actions are necessary as a result of weatherization work.

No H&S measures can be performed in a home unless ECMs are also part of the scope of work

Health 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,
- As guided, and noted as allowable, in the Health & Safety Plan (attachment to CSPM 614):
 - H&S funds cover the cost of testing and the installation of measures.
 - Client education or training costs can be charged to Training and Technical Assistance budget.

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- When Measures, Testing, Client Education, and Training are required or allowed in the H&S plan, DOE WAP funds may be used unless specified otherwise.
- The client file must include documentation that separates all costs into the appropriate budget category, including H&S.
- The rationale for performing each H&S measure in an individual home and its relationship to the ECM that necessitated it must be clearly documented in the client file.

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 H&S costs of a job do exceed more than 50% of the total job costs, the Grantee may submit a waiver for approval from BCAEO technical staff. The Grantee is responsible for documenting the email approval from the technical staff and including it with the file documentation. In instances where the H&S measure that pushes the H&S cost over 50% of total job cost is an ASHRAE fan or system, the subgrantee may move forward on the project without review and permission from the MDHHS-BCAEO Weatherization Specialist. 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. They are not included in the Average Cost Per Unit and are billed to their own line item.

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

Mandatory Health & Safety Measures

Some Health and Safety measures are mandatory to install or ensure. For the details on these items, see the “Mandatory Health & Safety Measures” section of CSPM 606.3.

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Community Services Policy Manual	SUBJECT: Weatherization Assistance Program LEAD PAMPHLET		EFFECTIVE DATE 7/1/2018 ISSUE DATE 7/22/2011

615 – LEAD PAMPHLET

REFERENCES

- DOE Weatherization Program Notice 17-7
- DOE Weatherization Program Notice 17-7, Table of Issues
- Environmental Protection Agency (EPA) Final Rule, 40 CFR Part 745

PURPOSE

The Weatherization Program Notice 17-7 Table of Issues, page 9, states:

“Crews must follow EPA's Lead; Renovation, Repair and Painting Program (RRP) when working in pre-1978 housing unless testing confirms the work area to be lead free.”

Under the 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

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- 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:

<https://www.epa.gov/lead/renovate-right-important-lead-hazard-information-families-child-care-providers-and-schools>

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

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Community Services Policy Manual	SUBJECT: Weatherization Assistance Program LIABILITY INSURANCE		EFFECTIVE DATE 07/01/2018 ISSUE DATE 7/17/2013

616 – LIABILITY INSURANCE

REFERENCES

- CFR 440.18
- U. S. Department of Energy (DOE) Weatherization Assistance Program Application Instructions

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.

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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.

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Community Services Policy Manual	SUBJECT: Weatherization Assistance Program RELEASE OF LIABILITY AND WAIVER OF CLAIMS		EFFECTIVE DATE 7/1/2019 ISSUE DATE 5/15/2007

617 – RELEASE OF LIABILITY AND WAIVER OF CLAIMS

REFERENCES

- Weatherization Program Notice 17-7
- Weatherization Program Notice 17-7 Table of Issues

PURPOSE

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.

All dwellings shall be checked for previous or existing mold and moisture problems. Audit procedures shall include a mold and moisture assessment, including a mold protocol or checklist. The assessment shall be a visual review that includes these four categories:

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

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

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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.

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618 – WEATHERIZATION ASSISTANCE PROGRAM TRAINING & CERTIFICATION REQUIREMENTS

REFERENCES

- State of Michigan Department Of Energy State Plan
- Department of Energy Weatherization Program Notice 15-4
- WAP Memorandum 034
- WAP Memorandum 036
- Michigan Weatherization Field Guide
- WAP 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) as clarified by WAP Memorandum 034.

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) that have occurred outside of MiTEC are to be entered by each subgrantee into SharePoint. For each of these items that happened within MiTEC, the student's record is maintained within the Learning Management System (LMS) and does not need to be submitted in SharePoint. A transition plan began in PY 2019 to move all items into the LMS. Each Subgrantee is required to inform BCAEO of any agency contractor/staff that achieves any of the Home Energy Professional

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certifications. Subgrantees can inform BCAEO by emailing the MDHHS-BCAEO@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 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.

Training Cancelation Costs

Any contractor or staff that registers for a training course through BCAEO is obligated to attend that training. If a contractor or staff person needs to cancel his or her attendance at a training, he or she must cancel the registration with BCAEO with greater than two business days' notice. If the contractor or staff person cancels with less than two business days' notice, or does not attend the training without informing BCAEO, the Grantee will be charged a fee of \$100.

DOE Identified Training Descriptions

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

Examples of Comprehensive Training include: Retrofit Installer/Technician, Crew Leader, Energy Auditor and Quality Control Inspector courses delivered by Interstate Renewable Energy Center (IREC)-accredited training providers, accredited for the JTA matching the job category.

Search for accredited training programs here:
<https://irecusa.org/credentialing/credential-holders/>

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Currently, IREC is the only accreditation body accrediting weatherization training programs. In order for technical field staff to maintain this training requirement, they must participate in Comprehensive training in alignment with their JTA every five years.

Individuals working in alignment with a JTA must register annually through a survey, or through the agency application, with BCAEO that they are working in this role.

Specific Training (previously called “Tier 2 Training”): Short-term training to address acute deficiencies in the field, single-issue training, conferences, and program management or leadership training is considered Specific Training since they do not encompass an entire JTA.

Examples of Specific Training include:

- On-the-job dense-pack insulation training
- State or agency training on new field guides or program guidance
- Software training for administrative personnel
- Management or leadership training seminar
- Weatherization conference sessions

Specific training may be provided by accredited or non-accredited training providers. Specific Training should be provided on an as-needed basis, as determined by monitoring reports, self-surveys, or other methods.

MiTEC, Michigan’s training center, is not yet accredited by a DOE approved certifying body but is working to become accredited. During PY19 and into PY20 until accredited, MiTEC will coordinate with partnering training centers accredited by a DOE approved certifying body to make Comprehensive training available in alignment with the JTAs. See below for details on requirements. MiTEC may provide Specific Training to Grantees on topics as identified as necessary by the Grantee or by BCAEO. Once accredited, MiTEC will provide nearly all Specific and Comprehensive training to the Michigan WAP network.

Comprehensive 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 (QCIs) certification from a DOE approved certifying body. On March 1st, 2019, QCI became a microcredential of Energy Auditor. After March 1st, 2019, all

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new or renewing QCIs must also be certified as an Energy Auditor through a DOE approved certifying body and hold the QCI microcredential.

Energy Auditor: Each grantee shall ensure that the Energy Auditor is performing work in compliance with the Energy Auditor JTA. Formal training for Energy Auditor must be provided by, or in cooperation with, a DOE approved accredited training organization. Individuals working in this role must participate in Comprehensive training every five years. If the job is not being performed in compliance, the Grantee must have a training plan in place to ensure compliance. In PY20, individuals working in this role who have not received Comprehensive training in the past three program years, must participate in this Comprehensive training.

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, or in cooperation with, a DOE approved accredited training organization. Individuals working in this role must participate in Comprehensive training every five years. If the job is not being performed in compliance, the Grantee must have a training plan in place to ensure compliance. In PY20, individuals working in this role who have not received Comprehensive training in the past three program years, must participate in this Comprehensive training. Individuals working in the Crew Leader role that missed their Comprehensive Training requirement in PY 2019 must take the Air Sealing and Dense Pack Insulation trainings as a component of their Comprehensive Training.

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, or in cooperation with, a DOE approved accredited training organization. Individuals working in this role must participate in Comprehensive training every five years. If the job is not being performed in compliance, the Grantee must have a training plan in place to ensure compliance. In PY20, individuals working in this role who have not received Comprehensive training in the past three program years, must participate in this Comprehensive training. Individuals working in the Retrofit Installer role that missed their Comprehensive Training requirement in PY 2019 must take the Air Sealing and Dense Pack Insulation trainings as a component of their Comprehensive Training.

Specific Training/Certification Requirements for Weatherization workers

Lead Safe Work and Lead Renovator Repair Painting Training

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All employees and contractors working on pre-1978 homes must receive training to install measures in a lead-safe manner in accordance with the SWS and EPA protocols, and installation must be overseen by an EPA Certified Renovator. In order to comply with EPA rules, shell contractor companies and agencies that employ crews must hold the EPA firm license in addition to requirements for individuals. Crews must follow EPA's Lead; Renovation, Repair and Painting Program (LRRP) when working in pre-1978 housing unless testing confirms the work area to be lead free. Different roles in Weatherization have different requirements for Lead Safe Work (LSW) or LRRP training and certification. All required training/certification must be completed within 180 days of the date they are hired. Documentation relative to LSW/LRRP certification shall be maintained at the agency. Requirements are as follows:

- **Energy Auditors and Quality Control Inspectors**
 - Individuals in these roles must receive either LSW or LRRP training and must follow EPA rules.
- **Mechanical, Electrical and Plumbing Contractors**
 - Individuals in these roles must follow EPA rules, but there are no training requirements for individuals beyond those listed generally in this section.
- **Shell Contractors and Crews (Crew Leaders and Retrofit Installers)**
 - Individuals in these roles must receive either LSW or LRRP training and must follow EPA rules.

Indoor Air Quality/Mold Training

Weatherization staff (as listed below) 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.

Indoor Air Quality (IAQ) training is required for individuals in the Michigan WAP as listed below. For further details on the IAQ training, contact MDHHS-MiTEC@Michigan.gov.

- **Energy Auditors and Quality Control Inspectors**
 - Individuals in these roles must receive Indoor Air Quality Training.
- **Mechanical, Electrical and Plumbing Contractors**
 - Individuals in these roles are not required to receive Indoor Air Quality Training.
- **Shell Contractors and Crews**
 - Individuals in these roles must receive Indoor Air Quality Training.

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OSHA 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/contractors 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/contractors) are required to attend training within 180 days of the date they are hired. Documentation relative to certification shall be maintained at the agency. The OSHA 30 hour course is not required for individuals in the Michigan WAP, but may replace the OSHA 10 hour to meet this requirement. (NOTE: Weatherization Agency Crew Leaders are no longer required to take the OSHA 30 hour course).

ASHRAE Training

Michigan’s WAP received on-site monitoring from DOE during PY 2019. In response to the issues discovered during this monitoring visit, the BCAEO is requiring that all WAP **Energy Auditors** and **QCIs** take ASHRAE 62.2 training during PY 2020. This required training is to ensure that those in the appropriate roles in Michigan’s WAP workforce understand ASHRAE calculations and proper use of calculation forms. The items of concern from the DOE monitoring around training were covered in the ASHRAE training offered by MiTEC in PY19. For that reason, individuals who participated in that training during PY19 will not be required to take them again in PY20.

CAZ Training

Michigan’s WAP received on-site monitoring from DOE during PY 2019. In response to the issues discovered during this monitoring visit, the BCAEO is requiring that all WAP **Energy Auditors** and **QCIs** take CAZ training during PY 2020. This required training is to ensure that those in the appropriate roles in Michigan’s WAP workforce understand proper CAZ testing for all conditions. The items of concern from the DOE monitoring around training were covered in the CAZ training offered by MiTEC in PY19. For that reason, individuals who participated in that training during PY19 will not be required to take them again in PY20.

Mobile Home Training

Michigan’s WAP received on-site monitoring from DOE during PY 2019. In response to the issues discovered during this monitoring visit, the BCAEO is requiring that all WAP **Energy Auditors, QCIs, Crew Leaders** and **Retrofit Installers/Technicians** take

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Mobile Home Weatherization training during PY 2020. This required training is to ensure that those in the appropriate roles in Michigan's WAP workforce understand proper duct pan testing and duct sealing. The items of concern from the DOE monitoring around training were covered in the Mobile Home training offered by MiTEC in PY19. For that reason, individuals who participated in that training during PY19 will not be required to take them again in PY20.

Customized Required Training

In addition to the required trainings described above, the BCAEO will require training as necessary based upon DOE monitoring results, BCAEO monitoring results and feedback provided from WAP stakeholders.

Agency Documentation Requirements

- 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 individuals' certification in LSW (if not LRRP certified)
- Documentation of individuals' certification in IAQ
- Documentation of individuals' certification in OSHA 10 hour or 30 hour
- Documentation of all individuals' participation in Comprehensive training and their relevant certifications, if applicable.

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618.1 – WEATHERIZATION ASSISTANCE PROGRAM INSPECTOR TRAINING

REFERENCES

- State of Michigan DOE State Plan
- Michigan Weatherization Field Guide
- Community Services Policy Manual
- Weatherization Program notice 15-4
- WAP Memorandum 034

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.

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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 CSPM 618 and 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 a candidate holds the BPI Energy Auditor certification, they may perform energy audits. In order for a Quality Control Inspector to perform energy audits, testing with BCAEO technical staff is recommended but not required. However, the Grantee must still require time in the field with BCAEO technical staff prior to allowing the QCI to perform energy 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 the certifications listed above, they must complete the required time in the field, testing/certification requirements and an over the shoulder test conducted by BCAEO technical staff.

If a Grantee chooses to utilize an Energy Auditor that has not been certified by the SOM, but holds the BPI Quality Control Inspector or BPI Energy Auditor certifications as listed above, it is the Grantee's 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.

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Regardless of certification or training status, Local Weatherization Program Managers may elect to have all individuals working as Energy Auditors be trained and tested by BCAEO technical staff when:

- Prior job performance has been weak
- Prior quality control checklists show missed opportunities
- Prior jobs require call backs
- The Energy Auditor has not performed an energy audit for an extended period of time
- The Energy Auditor's credentials are out dated
- The Energy Auditor is new to the agency
- Other reasons needed to show the skill level of the Energy Auditor

Additionally, if an individual holds the State of Michigan Energy Auditor certification but has not worked in a JTA within the past year, that individual must re-certify as an Energy Auditor with BCAEO technical staff. Through BCAEO quality assurance monitoring, it may be determined that a State of Michigan Energy Auditor must re-certify with BCAEO technical staff.

Training Components

Energy Auditor training and testing consists of five required components:

1. Comprehensive 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

1. Comprehensive Energy Auditor Training

Individuals working in this role must meet the Comprehensive Training requirements spelled out in CSPM 618.

2. 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

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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.

3. 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

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During the three-month training period, the sponsoring agency may contact the BCAEO at MDHHS-MiTEC@michigan.gov to request training in any areas necessary for the candidate.

4. BCAEO Training & Testing

BCAEO technical training includes:

- LSW (Lead Safe Work Practices) optional if LRRP Certification is obtained
- IAQ (Indoor Air Quality)

These trainings are offered regularly upon agency request by BCAEO at MDHHS-MiTEC@Michigan.gov. LSW and IAQ both including testing and certification

5. Other required WAP training includes:

- LRRP (Lead Renovator and Repair) (See CSPM 618 for requirements) – 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 MDHHS-MiTEC@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.

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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 MDHHS 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 passing score, AND
- Satisfactorily completes the gated items.

During the Skills Assessment, the Energy Auditor candidate is observed and scored on the criteria defined in the test. The assessment tool is based upon the DOE standardized curricula with compliance to all State of Michigan and local code

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requirements. The candidate will be evaluated upon successfully completing the audit and submitting all required paperwork to the MDHHS BCAEO proctor.

Once certified, the Energy Auditor can conduct independent audits.

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 MDHHS 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

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Evaluation/Recommendation

Satisfactory Audit – Michigan Energy Auditor
 Additional Site Audit Needed (equipment failed or test aborted)
 Unsatisfactory Audit – Failed (scored less than passing score and/or missed gated items)

An Energy Auditor candidate will pass the Energy Auditor skills assessment with a passing score or greater AND satisfactory completion gated items.

The scoring criteria and list of gated items is available upon request and ahead of any Energy Auditor exam from BCAEO at MDHHS-MiTEC@Michigan.gov.

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 a QC inspector from conducting final inspections for the SOM Weatherization program if the Energy

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auditor/QC inspector violates program policy. Definition of violations are listed by level below.

Level One Violations

Level One violations typically are defined as minor in nature. These types of violations will be reprimanded with a written warning to the certified Energy Auditor/QC Inspector that explains the violation along with the corrective action.

Level One Violations include when the Energy auditor/QC inspector does any one or more of the following:

1. Fails or refuses without good cause to exercise reasonable diligence in developing a home inspection report, preparing a report, or communicating a report; or
2. Fails to perform work or improvement to a residence upon which the Energy Auditor/QC Inspector performed a home inspection within the previous 12 months.

Level Two Violations

Level Two violations typically are defined as major in nature or repeated violations and/or the lack of corrective action for minor violations. These types of violations will be reprimanded with a written warning to the certified Energy Auditor/QC Inspector that explains the violation along with the corrective action. The Energy Auditor/QC Inspector is required to submit proof of corrective action in writing that the violation has been corrected. The warning and written response will become part of the record in the person's file. The review of the response and corrective action will be conducted to determine, if the person will be suspended or temporarily suspended.

Level Two Violations include when the Energy auditor/QC inspector does any one or more of the following:

1. Is responsible for citation of repeated findings in consecutive monitoring reports, fails to correct minor violations as identified in level one/written warnings/reprimands; or
2. Commits an act or acts of malpractice, gross negligence, or incompetence in the performance of home inspections.

Level Three Violations

Level Three violations are defined as a serious violation that may result in the termination of the certification. The violation must be well documented and supported with proof the violation occurred by the Energy Auditor/QC Inspector. A written notice of the violation and the appeal date will be given to the certified Energy Auditor/QC

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Inspector. 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.

Level Three Violations include when 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 BCAEO;
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. Accepts a home inspection assignment when the employment itself is contingent upon the home;
8. 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. 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.;
10. Practices as a licensed home Energy auditor/QC inspector without a current SOM Energy Auditor/QC Inspector certification; or
11. Any other level 3 violation.

Notice

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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

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- 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 and recertification training and testing prior to reinstatement of work.

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.

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618.2 – JOB TASK ANALYSIS (JTA)

REFERENCES

- State of Michigan DOE State Plan
- Michigan Weatherization Field Guide
- Community Services Policy Manual
- Weatherization Program notice 15-4
- WAP Memorandum 034
- 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 QCI is a residential energy-efficiency expert who ensures the completion,

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appropriateness, and quality of energy upgrade work by conducting a methodical inspection of the building and performing safety and diagnostic tests.

Domains/Tasks

Domain 1: In-Process Evaluation

Task 1: Verify worker compliance with safety regulations

Task 2: Evaluate in-process work quality

Task 3: Verify on-site documentation

Domain II: Postwork Evaluation

Task 1: Verify installed measures and initial assessment details

Task 2: Evaluate installed measures for compliance with standards

Domain III: Project Compliance and Completion

Task 1: Confirm whether policy requirements have been satisfied

Detailed Job Task Analysis for Quality Control Inspection can be found at the U.S. Department of Energy website:

<https://www.nrel.gov/docs/fy18osti/70977.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)

The Energy Auditor is an experienced professional who evaluates the health and safety issues, durability, comfort, and energy use of a residential building. The Energy Auditor

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conducts advanced diagnostic tests, gathers and analyzes data, and creates models to draw conclusions and make recommendations to the client for improvement.

Domains/Tasks

Domain 1: Collection of Visual, Material, Dimensional, and Appliance 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 health and safety data

Task 5: Collect appliance and base load information

Task 6: Identify a conditioned building enclosure

Task 7: Collect mechanical ventilation data

Task 8: Identify building insulation (attic, walls, and foundation/subspace)

Task 9: Collect attic data

Task 10: Collect wall data

Task 11: Collect window and door data

Task 12: Collect foundation/subspace data

Task 13: Collect roof data

Domain II: Diagnostic Testing of the Dwelling Unit for an Energy Audit

Task 1: Prepare the dwelling unit for the test(s)

Task 2: Test the electric appliances

Task 3: Conduct indoor air quality tests

Task 4: Determine the safety and efficiency of combustion appliances

Task 5: Determine air leakage of the building envelope

Task 6: Determine the performance of HVAC distribution

Domain III: Evaluation of Collected Energy Audit Data to Determine the Scope of Work

Task 1: Evaluate the health and safety data

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

Task 6: Evaluate the foundation/subspace

Task 7: Evaluate the walls

Task 8: Evaluate the attic

Task 9: Evaluate the doors and windows

Task 10: Use energy modeling software

Task 11: Generate the recommended work scope

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Detailed Job Task Analysis for Single Family Energy Auditor can be found on the U.S. Department of Energy website: <https://www.nrel.gov/docs/fy18osti/70985.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 Plan to Execute Scope of Work

Task 1: Identify materials and staffing needs

Task 2: Prepare homeowner/occupants for the scope of work

Task 3: Determine readiness of the job site for the scope of work

Task 4: Identify work site safety hazards and inform crew of safety requirements

Domain 2: Prepare and Maintain Job Site

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- Task 1: Locate and verify access to specific work areas
- Task 2: Protect interior/exterior of house (e.g. with drop cloths, poly, Tyvek booties, pressurizations)
- Task 3: Set up tools
- Task 4: Set up materials
- Task 5: Report out of scope preexisting conditions

Domain 3: Implement Scope of Work

- Task 1: Identify and report potential combustible safety hazards.
- Task 2: Install roof penetrations and weatherproofing
- Task 3: Rough in mechanical ventilation systems
- Task 4: Assist with mechanical systems upgrades
- Task 5: Install air sealing measures
- Task 6: Install or repair vapor retarders
- Task 7: Install insulation
- Task 8: Install windows and doors
- Task 9: Install baseload measures
- Task 10: Identify and report deviations from scope of work
- Task 11: Clean all debris and work materials from the job site

Domain 4: Manage Project

- Task 1: Conduct diagnostic testing
- Task 2: Adjust scope of work as needed to reflect current conditions
- Task 3: Post necessary paperwork, (e.g. permits, lead-based paint EPA requirements, historic preservation)
- Task 4: Monitor safety practices
- Task 5: Maintain and document project progression, personnel control, and compliance

Domain 5: Finalize Job

- Task 1: Verify that all components of the scope of work have been completed in compliance with required codes and standards.
- Task 2: Complete all post-work documentation as required (e.g. materials, labor hours, photos, 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:

<https://www.nrel.gov/docs/fy19osti/73578.pdf>

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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. Knowledge, skills, and abilities for a retrofit installer are contained in the Crew Leader JTA, "Domain 3: Implement Scope of Work". See below:

Domains/Tasks

Domain 3: Implement Scope of Work

Task 1: Identify and report potential combustible safety hazards.

Task 2: Install roof penetrations and weatherproofing

Task 3: Rough in mechanical ventilation systems

Task 4: Assist with mechanical systems upgrades

Task 5: Install air sealing measures

Task 6: Install or repair vapor retarders

Task 7: Install insulation

Task 8: Install windows and doors

Task 9: Install baseload measures

Task 10: Identify and report deviations from scope of work

Task 11: Clean all debris and work materials from the job site

Detailed Job Task Analysis can found contained in the Crew Leader JTA, "Domain 3: Implement Scope of Work" on the U.S. Department of Energy website:

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<https://www.nrel.gov/docs/fy19osti/73578.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>

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619 – STATE HISTORIC PRESERVATION OFFICE (SHPO) REVIEW

REFERENCES

- National Historic Preservation Act (16 USC 470F)
- 36 CFR Part 800.14
- 36 CFR Part 800 (Section 106)
- Department of Energy (DOE) Weatherization Program Notice 10-12 (including attachments), 18-1

PURPOSE

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.

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.

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

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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

Grantee must ensure that all weatherization activities not included in the list of categorical exclusion activities in Section 2.8 of WPN 20-1 is submitted to MDHHS-BCAEO@michigan.gov to process an environmental review submission according to the [National Environment Policy Act of 1969](#).

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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
735 E. Michigan Avenue
Lansing, MI 48912-1474

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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.

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621 – TERMINATION OR REDUCTION IN FUNDING

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 Grantees 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

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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.
4. An agency's inability to meet work quality standards (SWS and Michigan Field Guide).

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, DHHS will approve the QIP or specify in writing the reasons why the QIP is unacceptable.

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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.

In the event that an area is unserved, the MDHHS-BCAEO reserves the right to designate a provider for the service area until another Invitation to Bid is posted.

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

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- 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.

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622 – DOE SAVINGS TO INVESTMENT RATIO BUY-DOWN AND LEVERAGING

REFERENCES

- CFR 440.21
- 58 FR 41, page 1216
- DOE Weatherization Program Notice 16-5, 16-8
- DOE WAP Memorandum 035
- Community Services Policy Manual 606.1

PURPOSE

Per Department of Energy (DOE) Weatherization Memorandum 035:

“Definitions:

Buy Down – aligns with a private interest and the funding source retains the decision-making authority in identifying the building being selected for installation of the measure(s).

Leverage – aligns with the intention of supplementing the weatherization resources and the funding source does not identify specific buildings for the investment. For the purpose of WAP, funds that are considered “leveraged” indicates the funding source has transferred decision-making authority to the WAP agency to determine which buildings will receive the measure(s).”

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:

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- Incidental repair costs
- Optional weatherization measures costs
- Duct costs
- Attic venting costs
- Foundation venting costs

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.

NOTE: Subgrantees cannot use or request co-pay amounts from weatherization household members to buy-down measures.

Grantees will 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."

For WA 8.9/NEAT/MHEA audit instructions regarding this matter, see Community Services Policy Manual 606.1

Buy Down:

Buy down is only available in multifamily dwellings (including small buildings with 2-4 units) because a contribution is required for a buy down to occur. The statutory change in 1990 to allow for requiring contributions from landlords was only discussed in the context of multifamily buildings. Therefore, since the Statute did not address allowing Grantees to require financial participation from owners of single family rental units (or owner occupied non-rental units), DOE does not allow contributions from single family rental owners (including owner-occupied non-rental units) (58 FR 41, page 1216) to contribute toward a buy down. In order for measures 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 \geq 1.0, and the process outlined in WPN 16-5 must be followed.

- In the event there is a duplex where both units are renter-occupied, measures in both units are eligible for buy down if the package of measures at the pre-buy

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down cost has an SIR \geq 1.0.

- If the duplex has one side that is renter-occupied and the other side is owner-occupied, only the renter-occupied side of the building is eligible for the buy down. The building owner would not be able to fund any measures to be installed in the owner-occupied unit. The owner must contract for those measures independent of WAP.

DOE has not historically identified landlord contributions as leveraged funds because the funds have traditionally been attributed to the landlord's scope of work/building. DOE recognizes each agreement is different but, as a guiding principle, if the landlord agreement includes the installation of measures that do not have an SIR \geq 1.0, then the landlord contributions would follow the auditing process identified in WPN 16-5. As a reminder, 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 \geq 1.0.

- In the event contributions are made by a landlord that exceeds the agreement and there is no stipulation the funds be expended on a specific building(s), then those funds would be considered leveraged funds and could follow the modified auditing approach below.

Leveraging:

Leveraged resources, as interpreted by WAP are not designated for use in a specific residence. Rather, the funding source aims to achieve a certain objective and allows the receiving (WAP) agency to determine the individual recipient(s) of the measure(s) and it is the responsibility of the receiving agency to ensure the funding use aligns with the funding source's purpose (e.g., funds designated to purchase high efficiency furnaces; funds designated to purchase solar units at a discounted price to benefit low-income households; funds designated by a utility for measures but must be applied within the utility service area; etc.). Three important points:

- **Eligibility:** Leveraged funds and measures may be applied to single family dwellings as well as multifamily buildings. (Unlike buy down options which may only be applied to multifamily buildings.)
- **Environmental Credits/Attributes:** In instances where it is requested by the contributing party, DOE will allow the Grantee to yield DOE's share of environmental credits/attributes to the utility and/or funding source.
- **Modified Auditing Procedures:** If funds are leveraged and the funding source

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does not identify specific buildings but transfers decision-making authority to the agency to determine which buildings will receive the measure(s), DOE will allow agencies to simplify the auditing process and run the audit once with the leveraged cost included. In instances where the funds are being used to reduce the cost of a measure to meet the programs SIR requirement (e.g., furnaces or solar systems), agencies may enter the “discounted” cost for the measure into the audit tool (as if they were purchasing the item “on sale”), and document the discounted costs and funding sources in the file.

- This approach is appropriate only in cases where the measure being “discounted” remains the last measure in the package of measures being installed. Any instances wherein the measure isn’t last on the list, the audit should be reviewed on a case-by-case basis by BCAEO prior to implementation.
 - In the examples of high efficiency furnaces or solar units being made available at a discounted price to WAP, agencies would enter the actual cost incurred by WAP into the audit tool, not the full cost as required with a buy down.

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623 – DATA REQUESTS AND CONFIDENTIALITY

REFERENCES

- Weatherization Program Notice 10-8, 18-1
- 2 CFR 200
- 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) 10-8: "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

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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

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- 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

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624 – DISASTER PLANNING AND RELIEF

REFERENCES

- Weatherization Program Notice 12-7, 18-1
- 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

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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 \$6,500 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.

Reweathering 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

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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.

Attachment to 606.1 – NEAT / MHEA Steady State Efficiency (SSE) Data Input

Purpose: For use in modifying the measured or nameplate steady-state efficiency (SSE) of existing gas-fired space heating equipment before entering it into NEAT and MHEA.

Currently, measured or nameplate values are entered in the audit software for older, existing gas furnaces. NEAT/MHEA takes SSE and converts it to estimate Annual Fuel Utilization Efficiency (AFUE), which is how newer equipment is rated. The software uses this to assess the savings potential of a furnace replacement. The current software process does not convert the SSE of older gas-fired furnaces to a realistic estimated AFUE. The following will allow for a more accurate analysis.

Criteria:

- In site-built homes – **only** draft hood equipped gas furnaces
- In mobile homes – **only** standard low efficiency (no draft inducer fan) gas furnaces
- Must be standing pilot
- No vent damper
- Cannot be used in conjunction with the Part Load Reduction Factor for oversized equipment

NEAT Formula:

In NEAT, under the “Heating” tab, there will be a section called “Gas Furnace Details”. In the box titled “Steady State Efficiency”, input an efficiency for the existing unit based on the following formula:

$$\text{(Measured SSE OR nameplate efficiency x .80) / .95 = SSE entered in NEAT}$$

Meas/Calc %	72	73	74	75	76	77	78	79	80
NEAT input	60.6	61.5	62.3	63.2	64	64.8	65.7	66.5	67.4

MHEA Formula:

In MHEA, under the “Heating” tab, there will be a sub-tab labeled “Primary”. Select “AFUE” in the box titled “Efficiency Units”. In the box titled “Efficiency”, input an efficiency for the existing unit based on the following formula:

$$\text{(Measured SSE OR nameplate efficiency x .80) = AFUE entered in MHEA}$$

Meas/Calc %	72	73	74	75	76	77	78	79	80
MHEA input	57.6	58.4	59.2	60	60.8	61.6	62.4	63.2	64

Examples:

Existing equipment efficiency can be measured by a combustion analyzer (78% SSE for example) or calculated (nameplate states 90,000 Btuh input and 70,000 Btuh bonnet/output capacity – 70K divided by 90K = 78%)

NEAT: 78% measured or calculated on a draft hood furnace – you would input an SSE of 65.7% into NEAT

MHEA: 78% measured or calculated on a standard low-efficiency furnace – you would input an efficiency of 62.4% into MHEA after selecting “AFUE” in the “Efficiency Units” field

Attachment to 606.1 – Michigan Candidate Measure Selection and Measure Lifetimes for WA 8.9

NEAT

1.	Building Insulation	Attic insulation R-11	<input checked="" type="checkbox"/>	24*
2.	Building Insulation	Attic Insulation R-19	<input checked="" type="checkbox"/>	24*
3.	Building Insulation	Attic Insulation R-30	<input checked="" type="checkbox"/>	24*
4.	Building Insulation	Attic Insulation R-38	<input checked="" type="checkbox"/>	24*
5.	Building Insulation	Attic Insulation R-49	<input checked="" type="checkbox"/>	24*
6.	Building Insulation	Filling Ceiling Cavity	<input checked="" type="checkbox"/>	24*
7.	Building Insulation	Sillbox insulation	<input checked="" type="checkbox"/>	20
8.	Building Insulation	White roof coating	<input type="checkbox"/>	7
9.	Building Insulation	Foundation wall insulation	<input checked="" type="checkbox"/>	20
10.	Building Insulation	Floor insulation R-11	<input checked="" type="checkbox"/>	20
11.	Building Insulation	Floor insulation R-19	<input checked="" type="checkbox"/>	20
12.	Building Insulation	Floor insulation R-30	<input checked="" type="checkbox"/>	20
13.	Building Insulation	Floor insulation R-38	<input checked="" type="checkbox"/>	20
14.	Building Insulation	Wall insulation	<input checked="" type="checkbox"/>	24*
15.	Building Insulation	Kneewall insulation	<input checked="" type="checkbox"/>	24*
16.	Building Insulation	Duct insulation	<input checked="" type="checkbox"/>	20
17.	Doors and Windows	Window sealing	<input checked="" type="checkbox"/>	10
18.	Doors and Windows	Door Replacement	<input checked="" type="checkbox"/>	20
19.	Doors and Windows	Storm windows	<input checked="" type="checkbox"/>	15
20.	Doors and Windows	Window Replacement	<input checked="" type="checkbox"/>	20
21.	Doors and Windows	Low E windows	<input type="checkbox"/>	20
22.	Doors and Windows	Window shading (awning)	<input type="checkbox"/>	10
23.	Doors and Windows	Sun screen fabric	<input type="checkbox"/>	10
24.	Doors and Windows	Sun screen louvered	<input type="checkbox"/>	10
25.	Doors and Windows	Window film	<input type="checkbox"/>	15
26.	HVAC Systems	Thermal vent damper	<input type="checkbox"/>	10
27.	HVAC Systems	Electric vent damper	<input type="checkbox"/>	10
28.	HVAC Systems	IID	<input type="checkbox"/>	10
29.	HVAC Systems	Electric vent damper IID	<input checked="" type="checkbox"/>	10
30.	HVAC Systems	Flame retention burner	<input type="checkbox"/>	10
31.	HVAC Systems	Furnace tune up	<input checked="" type="checkbox"/>	3
32.	HVAC Systems	Replace heating system	<input checked="" type="checkbox"/>	18
33.	HVAC Systems	High efficiency furnace	<input checked="" type="checkbox"/>	18
34.	HVAC Systems	High efficiency boiler	<input checked="" type="checkbox"/>	20
35.	HVAC Systems	Smart Thermostat	<input checked="" type="checkbox"/>	15
36.	HVAC Systems	Tune up AC	<input type="checkbox"/>	3
37.	HVAC Systems	Replace AC	<input type="checkbox"/>	15
38.	HVAC Systems	Evaporative cooler	<input type="checkbox"/>	15

39.	HVAC Systems	Install/Replace heatpump	<input type="checkbox"/>	15
40.	Base Loads	Lighting retrofits	<input checked="" type="checkbox"/>	15
41.	Base Loads	Refrigerator replacement	<input checked="" type="checkbox"/>	15
42.	Base Loads	Water heater tank insulation	<input type="checkbox"/>	13
43.	Base Loads	Water heater pipe insulation	<input type="checkbox"/>	13
44.	Base Loads	Lo flow showerheads	<input type="checkbox"/>	15
45.	Base Loads	Water heater replacement	<input checked="" type="checkbox"/>	13

MHEA

1.	General Heat Waste	Seal Ducts	<input checked="" type="checkbox"/>	10
2.	General Heat Waste	General Air Sealing	<input checked="" type="checkbox"/>	10
3.	Building Insulation	Wall fiberglass batt insulation	<input checked="" type="checkbox"/>	24*
4.	Building Insulation	Wall fiberglass batt insl in Addition	<input checked="" type="checkbox"/>	20
5.	Building Insulation	Wall cellulose loose insl	<input type="checkbox"/>	24*
6.	Building Insulation	Wall cellulose insl loose in Addition	<input checked="" type="checkbox"/>	24*
7.	Building Insulation	Wall fiberglass loose insl	<input checked="" type="checkbox"/>	24*
8.	Building Insulation	Wall fiberglass loose in Addition	<input checked="" type="checkbox"/>	24*
9.	Building Insulation	Floor cellulose loose insl	<input type="checkbox"/>	20
10.	Building Insulation	Floor Cellulose loose insl in Addition	<input type="checkbox"/>	20
11.	Building Insulation	Floor fiberglass loose insl	<input checked="" type="checkbox"/>	20
12.	Building Insulation	Floor fiberglass loose insl in Addition	<input checked="" type="checkbox"/>	20
13.	Building Insulation	Roof cellulose loose insl	<input type="checkbox"/>	24*
14.	Building Insulation	Roof cellulose loose insl in Addition	<input checked="" type="checkbox"/>	24*
15.	Building Insulation	Roof fiberglass loos insl	<input checked="" type="checkbox"/>	24*
16.	Building Insulation	Roof fiberglass loose insl in Addition	<input checked="" type="checkbox"/>	24*
17.	Building Insulation	Add Skirting	<input type="checkbox"/>	10
18.	Building Insulation	Add skirting on Addition	<input type="checkbox"/>	7
19.	Building Insulation	White roof coating	<input type="checkbox"/>	7
20.	Building Insulation	White roof coating in Addition	<input type="checkbox"/>	7
21.	Doors and Windows	Replace marked doors (mandatory)	<input checked="" type="checkbox"/>	15
22.	Doors and Windows	Replace wooden doors	<input type="checkbox"/>	15
23.	Doors and Windows	Replace wooden doors in Addition	<input checked="" type="checkbox"/>	15
24.	Doors and Windows	Storm doors	<input checked="" type="checkbox"/>	10
25.	Doors and Windows	Storm doors in Addition	<input checked="" type="checkbox"/>	10
26.	Doors and Windows	Window sealing	<input checked="" type="checkbox"/>	10
27.	Doors and Windows	Window sealing in Addition	<input checked="" type="checkbox"/>	10
28.	Doors and Windows	Replace Single paned windows	<input checked="" type="checkbox"/>	20
29.	Doors and Windows	Replace single paned windows in Addition	<input checked="" type="checkbox"/>	20
30.	Doors and Windows	Plastic storm windows	<input checked="" type="checkbox"/>	5
31.	Doors and Windows	Plastic storm windows in Addition	<input checked="" type="checkbox"/>	5
32.	Doors and Windows	Glass storm windows	<input checked="" type="checkbox"/>	15
33.	Doors and Windows	Glass storm windows in Addition	<input checked="" type="checkbox"/>	15

34.	Doors and Windows	Add awnings	<input type="checkbox"/>	10
35.	Doors and Windows	Add awnings in Addition	<input type="checkbox"/>	15
36.	Doors and Windows	Add shade screens	<input type="checkbox"/>	10
37.	Doors and Windows	Add shade screens in Addition	<input type="checkbox"/>	10
38.	HVAC Systems	Setback thermostat	<input checked="" type="checkbox"/>	15
39.	HVAC Systems	Tune heating system	<input checked="" type="checkbox"/>	3
40.	HVAC Systems	Evaporative cooling	<input type="checkbox"/>	15
41.	HVAC Systems	Tune cooling system	<input type="checkbox"/>	3
42.	HVAC Systems	Replace dx cooling equipment	<input type="checkbox"/>	15
43.	Baseloads	Lighting Retrofits	<input checked="" type="checkbox"/>	15
44.	Baseloads	Refrigerator replacement	<input checked="" type="checkbox"/>	15
45.	Baseloads	Water heater tank insulation	<input type="checkbox"/>	13
46.	Baseloads	Water heater pipe insulation	<input type="checkbox"/>	13
47.	Baseloads	Low flow showerheads	<input type="checkbox"/>	15
48.	HVAC	Water heater replacement	<input checked="" type="checkbox"/>	13
49.	HVAC	Replace heating system	<input checked="" type="checkbox"/>	20

* Enter 24-year lifetime when 30 year lifetime is desired to accommodate program limitations

**Attachment to 608 – U.S. Department of Housing and Urban
Development Multifamily Certification of Income Eligibility for the
Department of Energy’s Weatherization Assistance Program**

Name of Property: _____ Property Address:

No. of Buildings on this Property: _____ No. of Total

Units: _____

I, _____ on behalf of _____

the (owner/agent) for this property, do hereby certify that:

(1) I maintain certified income records for households residing at this property for the purposes of complying with one or more federal or state rental subsidy or tax credit programs.

(2) I have reviewed the current certified personal income records for households residing at this property; and

(3) Based on my review of the personal income records on file for the households residing at this property, a minimum of 66 percent of the units (or 50 percent in 2- and 4-unit buildings) in either ___all buildings or building nos. _____ (specify building nos. corresponding with accompanying spreadsheet) have certified personal incomes that do not exceed 200 percent annually of the current federal poverty level, based on household size.

I hereby attach supporting documentation for each building in the property as required by HUD to support the self-certification of this property or building as eligible for the Weatherization Assistance Program. I furthermore certify that all information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

Disclaimer: False claims and or statements are subject to full prosecution by HUD. Conviction of false claims and or statements may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Signature: _____

Printed Name Title

Phone No. E-mail

Date _____

This Form and the accompanying Multifamily Occupancy Report worksheet file may be emailed to energyaction@hud.gov; the Form may also be faxed to 202-708-0465.

Attachment to 608.2 – Sample Landlord Agreement

GRANTEE LETTERHEAD

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 Michigan Department of Health and 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 Michigan Department of Health and Human Services has contracted with The Local Weatherization Operator (LWO) 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.

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.

Attachment to 608.2 – Sample Landlord Agreement – Exhibit A

GRANTEE LETTERHEAD

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:

<u>Address</u>	<u>Unit Number</u>	<u>Monthly Rent</u>

Signature of Owner or Authorized Representative _____ Date _____

Signature of Local Weatherization Operator Representative _____ Date _____

Attachment to 608.2 – Sample Landlord Agreement – Exhibit B

GRANTEE LETTERHEAD

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).

<u>Address</u>	<u>Unit Number</u>

Signature of Owner or Authorized Representative

Date

Signature of Local Weatherization Operator Representative

Date

Attachment to 608.2 – Sample Landlord Agreement – Tenant Synopsis

GRANTEE LETTERHEAD

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

The Michigan Department of Health and 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 Michigan Department of Health and 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)

Attachment to 612 – Client File Forms

HAZARD IDENTIFICATION AND NOTIFICATION

Weatherization achieves energy and cost savings and improved comfort, health and safety of homes through a variety of home retrofit measures. A Health and Safety Assessment must be performed to identify hazards in the home. When hazards are identified, appropriate testing must be performed when required by the Health and Safety Plan. If Inspector discovers a condition that, in his/her judgment, presents a risk of imminent threats to health or safety are observed during the course of the assessment and/or weatherization assistance program work, the Inspector will disclose that condition to the occupants, landlord, and property manager immediately. Such "occupants" may be renters whose health and safety may be at risk due to an identified hazard.

Client Information:

Name:	
Address:	
Phone:	
Agency Name/Contact Information:	

Hazard Identification: (List a clear description of the problem.)

Will the identified hazards lead to a deferral?

Audit/Assessment/Testing: (List the testing completed and a summary of the results.)

Type of Audit/Test	Date of Audit/Test	Name of Inspector/Assessor/Auditor	Date Client was informed	Summary of Results
NEAT				

Inspectors make sure that their general liability insurance and errors and omissions (E&O) insurance are at levels appropriate to cover their particular state's liability limits for injuries caused by their negligence or their failure to warn of a defect they discovered or should have discovered during the course of their inspection.

Inspector Name: _____

Signature: _____ Date: _____

I have carefully read this form and have signed it of my own free will. The client(s) signature(s) indicate that the client understands and have been informed of their rights and options.

Client Name: _____

Client Signature: _____ Date: _____

Pre-Renovation Form
Confirmation of Receipt of Lead Pamphlet
Michigan Department of Human Services
Effective until April 2010

AUTHORITY: 40 CFR PART 745 and Public Act 230 of 1981
COMPLETION : Voluntary
PENALTY: None

The Local Weatherization Agency will not discriminate against any individual or group because of race, sex, religion, age, national origin, color, marital status, political beliefs or disability. If you need help with reading, writing, hearing, etc., under the Americans with Disabilities Act, you are invited to make your needs known to a local Weatherization office serving your county.

- I have received a copy of the pamphlet, **Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools** informing me of the potential risk of the lead hazard exposure from renovation activity to be performed in my dwelling unit . I received this pamphlet before the work began.

Printed name of recipient

Date

Signature of recipient

Date

Self-Certification Option (for tenant-occupied dwellings only) –

If the lead pamphlet was delivered but a tenant signature was not obtainable, you may check the appropriate box below.

- Refusal to sign – I certify that I have made a good faith effort to deliver the pamphlet, **Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools**, to the rental dwelling unit listed below at the date and time indicated and that the occupant refused to sign the confirmation of receipt. I further certify that I have left a copy of the pamphlet at the unit with the occupant.
- Unavailable for signature – I certify that I have made a good faith effort to deliver the pamphlet, **Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools**, to the rental dwelling unit listed below and that the occupant was unavailable to sign the confirmation of receipt. I further certify that I have left a copy of the pamphlet at the unit by sliding it under the door..

Printed name of person certifying
Lead pamphlet delivery

Attempted delivery date and time
lead pamphlet delivery

Signature of person certifying lead pamphlet delivery

Date

Unit Address

Note Regarding Mailing Option—As an alternative to delivery in person, you may mail the lead pamphlet to the owner and/or tenant. Pamphlet must be mailed at least 7 days before work begins. (Document this process in the case file with a certificate of mailing from the post office attached to a copy of the Agency's letter).

WEATHERIZATION PROGRAM CLIENT INSPECTION/ASSESSMENT State of Michigan Department of Human Services	Weatherization Agency Name:		
	Address (Street Number and Name):		
	City:	State: Michigan	Zip Code:
	Telephone Number: ()		

Client Name:		Address of Home (Street Number and Name):	
City:	State: Michigan	Zip Code:	Job Number:

The services performed on your home were completed to the extent possible within the current available funding and program limitations. The services provided are free of charge. Please rate the performance of each task which was completed. Thank you for your cooperation.

WEATHERIZATION MEASURE Check Work Performed		CLIENT ASSESSMENT			WEATHERIZATION MEASURE Check Work Performed		CLIENT ASSESSMENT		
		Good	Fair	Poor			Good	Fair	Poor
<input type="checkbox"/>	Health and Safety	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Band Joist Insulation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Major Bypasses	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Floor Insulation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Duct Sealing/Repair/Replacement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Perimeter Insulation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Duct Insulation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Refrigerator Replacement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Furnace Filter	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Water Heater Replacement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Attic Insulation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Furnace Replacement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Knee wall Insulation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Wall Insulation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Infiltration/Exfiltration	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Compact Fluorescent Light Bulbs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

*Please note that not all the above measures are installed on every home. The local weatherization agency makes final installation decisions after their pre-inspection and after reviewing total job costs and program limitations.

I understand that representatives of the state and federal government have the responsibility to monitor the performance of the weatherization agency. This means that the work performed to my dwelling may be inspected by representatives of those organizations.

By signature, I certify that the weatherization tasks were completed in my home and I have rated the weatherization crew's work performance.

Client's Signature:	Date:
Inspector's Signature:	Date:

Additional Comments:

AUTHORITY: P.A. 230 OF 1981 COMPLETION: Required PENALTY: None	The Department of Human Services will not discriminate against any individual or group because of race, sex, religion, age, national origin, color, marital status, political beliefs or disability.
----------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**INFRARED SCAN REPORT
WEATHERIZATION PROGRAM**
State of Michigan
Department of Human Services

Weatherization Agency Name			
Job Number		Client Name	
Address (Street Number and Name)			
Contractor		City	State
Scan By		Date	Telephone Number ()

INTERIOR WALL ELEVATIONS (MAIN FLOOR)

INTERIOR WALL ELEVATIONS (2ND FLOOR)

A.	H.	1.	4.
B.	I.	2.	5.
C.	J.	3.	6.
D.	K.	Draw Views of Structure (Main Floor Plan)	
E.	L.		
F.	M.	Draw Views of Structure (2nd Floor Plan)	
G.	N.		

Symbols

BR -- Bedroom	LR -- Living Room
DR -- Dining Room	K -- Kitchen
B -- Bath	C -- Closet
KC -- Kitchen Cabinets	FP -- Fireplace
KW -- Knee wall	III -- Studs
LD -- Low Density	H -- Header
P -- Partition	W -- Window
? -- Scan Unclear	D -- Door
RA -- Return Air / Duct	
SL -- Sloped Ceiling	
ST -- Stairs	
V -- Void	

Comments

(Void Area _____ SF) + (Total Wall Area _____ SF) = _____ % Void

Authority: PA 230 of 1981
Completion: Required
Penalty: None

The Department of Human Services will not discriminate against any individual or group because of race, sex, religion, age, national origin, color, marital status, political beliefs or disability.

WEATHERIZATION PROGRAM NOTICE OF POTENTIALLY UNSAFE CONDITION State of Michigan Department of Human Services	Weatherization Agency Name:		
	Address (Street Number and Name):		
	City:	State: Michigan	Zip Code:
	Telephone Number: ()		

Client Name:		Address of Home (Street Number and Name):	
City:	State: Michigan	Zip Code:	Job Number:

Unsafe Condition:

Person(s) Notified (Client, Landlord, Owner, Third Party):

Recommendations:

Questions concerning "Lead" may be directed to the Environmental Protection Agency - LEAD HOTLINE: (800) 424-5323.

A copy of this notice was sent to all parties of interest listed above (a copy shall be retained in the client file)	Signature of Agency Representative:	Date:
----------------------------------------------------------------------------------------------------------------------	-------------------------------------	-------

AUTHORITY: P.A. 230 OF 1981 COMPLETION: Required PENALTY: None	The Department of Human Services will not discriminate against any individual or group because of race, sex, religion, age, national origin, color, marital status, political beliefs or disability.
----------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

WEATHERIZATION PROGRAM ASBESTOS NOTICE State of Michigan Department of Human Services	Weatherization Agency Name:		
	Address (Street Number and Name):		
	City:	State: Michigan	Zip Code:
	Telephone Number: ()		

Client Name:		Address of Home (Street Number and Name):	
City:	State: Michigan	Zip Code:	Job Number:

This letter is to make you aware of the presence of asbestos containing materials in: _____

Person(s) Notified (Client, Landlord, Owner, Third Party):

This material should not be disturbed. There is no need for concern relative to the presence of this material if it is left undisturbed. Avoid any handling of this material which could put asbestos dust particles in the air. Airborne asbestos particles pose a potential health hazard. Removal should only be done by a licensed asbestos abatement contractor.

Weatherization workers are not qualified or allowed to work on any asbestos containing products which could create asbestos dust.

The Michigan Department of Human Services, State Emergency Relief Program may be able to help with asbestos removal if the furnace is being replaced.

Further information on asbestos is available from the U.S. Consumer Product Safety Commission. They may be contacted by calling (800) 638-2772 or writing U.S. Consumer Product Safety Commission, Washington, D.C. 20207. Also, the U.S. Environmental Protection Agency has an "Asbestos Hotline" at (800) 368-5858. State regulations on asbestos are administered by the Michigan Department of Energy, Labor & Economic Growth (DELEG) Asbestos Program. The program also enforces asbestos issues related to the Michigan Occupational Safety and Health Act (MIOSHA) (Act 154, P.A. 1974, as amended).

A copy of this notice was sent to all parties of interest listed above (a copy shall be retained in the client file)	Signature of Agency Representative:	Date:
----------------------------------------------------------------------------------------------------------------------	-------------------------------------	-------

AUTHORITY: P.A. 230 OF 1981 COMPLETION: Required PENALTY: None	The Department of Human Services will not discriminate against any individual or group because of race, sex, religion, age, national origin, color, marital status, political beliefs or disability.
----------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**WEATHERIZATION CHECKLIST FOR
CLIENT/JOB FILE DOCUMENTATION**

State of Michigan
Department of Human Services

Weatherization Agency Name		
Client Name		
Address (Street Number and Name)		
City	State	Rep. Initials

Job Number _____

I. CLIENT ELIGIBILITY (see CSPM for policies/forms)

<p>Yes/NA <input type="checkbox"/> / <input type="checkbox"/> 1. Standard Application Form, DHS-4283 <input type="checkbox"/> / <input type="checkbox"/> 2. Income Eligibility Documentation and Calculations <input type="checkbox"/> / <input type="checkbox"/> 3. Home Ownership <input type="checkbox"/> / <input type="checkbox"/> 4. Landlord Agreement/Exhibits/Tenant Synopsis/ and Lease</p>	<p> <input type="checkbox"/> / <input type="checkbox"/> 5. Documentation of Landlord Contribution (if applicable) <input type="checkbox"/> / <input type="checkbox"/> 6. Priority Criteria Selection <input type="checkbox"/> / <input type="checkbox"/> 7. Documentation of Annual Heating and Electric Usage <input type="checkbox"/> / <input type="checkbox"/> 8. Written Notification of Eligibility/Ineligibility a. Notification of Job Scheduling b. Notification of Appeal Process </p>
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

II. JOB-RELATED

<p>Yes/NA <input type="checkbox"/> / <input type="checkbox"/> 1. Approved Audit <input type="checkbox"/> / <input type="checkbox"/> 2. 552 Health and Safety Assessment Findings <input type="checkbox"/> / <input type="checkbox"/> 3. 552A Release of Liability and Waiver of Claims <input type="checkbox"/> / <input type="checkbox"/> 4. NEAT Job Input Summary Report/NEAT Output Summary Report <input type="checkbox"/> / <input type="checkbox"/> 5. Confirmation of Receipt of Lead Pamphlet <input type="checkbox"/> / <input type="checkbox"/> 6. Client Energy Plan of Action <input type="checkbox"/> / <input type="checkbox"/> 7. Asbestos Notification Letter DHS -4290 <input type="checkbox"/> / <input type="checkbox"/> 8. Notice of Indoor Air Quality Concern DHS -4289 <input type="checkbox"/> / <input type="checkbox"/> 9. Notice of Potentially Unsafe Condition DHS -4288 <input type="checkbox"/> / <input type="checkbox"/> 10. Certificate of Insulation <input type="checkbox"/> / <input type="checkbox"/> 11. Contractor's Invoice <input type="checkbox"/> / <input type="checkbox"/> 12. Post-inspection Documentation/Corrections Approved <input type="checkbox"/> / <input type="checkbox"/> 13. Client Inspection/Assessment DHS -1008 <input type="checkbox"/> / <input type="checkbox"/> 14. Appliance Replacement/Disposal Documentation <input type="checkbox"/> / <input type="checkbox"/> 15. Permit(s) for Furnace or Water Heater Replacement <input type="checkbox"/> / <input type="checkbox"/> 16. Other _____ <input type="checkbox"/> / <input type="checkbox"/> 17. _____ <input type="checkbox"/> / <input type="checkbox"/> 18. _____</p>

Authority: PA 230 of 1981
Completion: Optional
Penalty: None

The Department of Human Services will not discriminate against any individual or group because of race, sex, religion, age, national origin, color, marital status, Political beliefs or disability.

Radon Informed Consent

Weatherization achieves energy and cost savings and improved comfort, health and safety of homes through a variety of home retrofit measures, including some which improve the airtightness of the building. According to the Department of Energy (DOE) sponsored study, "[Weatherization and Indoor Air Quality: Measured Impacts in Single-family Homes under the Weatherization Assistance Program](#)," there is a small risk of increased radon levels in homes when the building air tightness levels are improved. These increases are smaller in manufactured housing everywhere, and all homes in low-radon potential counties, and higher in site-built homes in high-radon-potential counties. There is some evidence that the installation of continuous mechanical ventilation reduces radon levels in homes, and counteracts any radon increases that are due to improved building air tightness levels.

The following radon precautions will be implemented in all weatherized homes to reduce the possibility of exacerbating any potential radon issues:

- Whenever site conditions permit, exposed dirt floors within the pressure/thermal boundary will be covered.
- Other precautions may include, but are not limited to:
 - Sealing any observed floor and/or foundation penetrations, including open sump pits;
 - Isolating the basement from the conditioned space; and
 - Ensuring crawl space venting is installed.

I am aware that weatherization may result in increased levels of radon, and that mechanical ventilation may counteract those increases. I have received the Environmental Protection Agency's (EPA's) "A Citizen's Guide to Radon," and radon-related risks were discussed. I have chosen to go forward with weatherization and accept all risks of injury or damages.

I have carefully read this informed consent form and have signed it of my own free will.

Client Name Printed: _____

Client Signature: _____ Date: _____

Energy Auditor Signature _____ Date: _____

RELEASE OF LIABILITY AND WAIVER OF CLAIMS

Department of Human Services

AGENCY NAME

Health and Safety Assessment

In addition to the energy audit we will do on your home, we will do a limited health and safety assessment of the home. The health and safety assessment will consist of a visual inspection for potential health and safety problems. You will be notified of any health and safety problems that are identified, including mold. However, the evaluator is not a qualified mold professional. Mold may be present in areas not accessible or seen during the visual inspection or during the actual work on your home. Work on your home will be performed in a manner to prevent future mold growth. Mold can be a problem in any home, but especially in those where there is an excessive amount of moisture or humidity present. In addition, if there are several people, pets, plants or fish aquariums present, conditions may exist for mold to grow. If there are existing conditions that are seen or unseen, we shall not be held responsible or liable. The agency and its contractors will be held harmless for any future moisture or mold problems that are not directly attributable to weatherization work.

Weatherization Activities

Notice: During weatherization activities, particularly when insulation is being blown into wall cavities and attics, insulation dust, other types of dust, and other particles may become airborne. Additionally, unforeseen circumstances may result in some insulation leaking through cracks into the home's living space. In those circumstances where insulation leaks into the living space, we will be responsible for clean-up (repairing damage and cleaning up the living area). Minor construction dust is inevitable at the end of any remodeling work. Construction dust clean-up will be the responsibility of the home owner/occupant.

Recommendation: It is recommended that people with the following health conditions be out of the house when insulation is being blown into the house: Asthma, emphysema, allergies and other respiratory conditions, pregnancy and any serious health conditions such as decreased immune functions which might be aggravated by dust and other dust-like particles in the air. Furthermore, it is also recommended that infants less than 12 months old should be out of the house when insulation is being blown. Persons who leave the house during the insulation process should remain outside the house for at least 30 minutes after completion of insulation activities.

Release of Waiver of Claims: I acknowledge by my signature below receipt of the information and recommendations set out above. Additionally, I agree on behalf of myself and any minor children or others for whom I am responsible, to hold the agency and its agents harmless from any claims, medical problems or personal injuries that may occur, develop or worsen in response to the weatherization activities. This waiver is for all damages, direct or indirect, that may relate to weatherization activities, including money lost by not being able to work, healthcare costs and pain or suffering.

I am aware the weatherization process may cause airborne particles, including dust, to be released in my home and that such airborne particles can aggravate health conditions. I have chosen to go forward with the weatherization process, accepting any and all risks of injury or damages.

I have carefully read this release and waiver and fully understand its contents. I am aware this is a release of liability and have signed it of my own free will.

Client Name	Phone	Job File Number
Address	City/Zip	
Client Signature	Date	Agency Witness Date

Agency File (*always*)
Copy – Client (*always*)

MICHIGAN WEATHERIZATION PROGRAM HEALTH & SAFETY ASSESSMENT FINDINGS

Department of Human Services
AGENCY NAME

Client Name	Job Number
Address	City, Zip

1. Moisture Areas – Existing conditions *(check all that apply)*

- Actual construction defect or deterioration that allows water into the home *(roof, decks, windows, concrete slabs, moisture infiltration)*
 - Evidence of conditions that might allow water in the home *(poor grading, bad flashing, bad/missing gutters)*
 - Any other source of water vapor or moisture; signs of condensation
 - Plumbing defects *(leaking drains, pipes or toilet seals, missing caulk on sinks or tubs)*
 - Damp atmosphere in house
 - Evidence of water penetrating the home *(stains, moist areas)*
 - Visible mold growth *(if "Yes," complete #2)*
 - HVAC problems *(dirty, moist filters, poor condensation drainage, plugged or disconnected vents)*
 - Dryer vented indoors, inadequate ventilation for kitchen, bath or other high moisture area
 - Other *(planters, aquariums, hot tubs, nearby swamps, etc.)* List all that apply
-
- Client complaint of allergy-like symptoms

2. Mold Areas – Existing conditions *(check all that apply)*

Checklist	Mold/Musty Odors	Existing Mold	Sq. Ft. of Mold Area	No Evidence of Excessive Mold Found
<input type="checkbox"/> Bath <i>(location):</i> _____	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
<input type="checkbox"/> Shower <i>(location):</i> _____	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
<input type="checkbox"/> Kitchen	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
<input type="checkbox"/> Laundry Area	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
<input type="checkbox"/> Basement Walls	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
<input type="checkbox"/> Crawlspace	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
<input type="checkbox"/> Exterior Walls	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
<input type="checkbox"/> Attic	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
<input type="checkbox"/> Ceilings	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
<input type="checkbox"/> Other <i>(specify)</i> _____	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>

Moisture/Mold Disclaimer: By signing below, I acknowledge that I have received the above information concerning moisture and mold conditions in my home prior to any weatherization work being done and I will take steps to reduce excessive moisture by utilizing one or more of the tips in the attached Client Tips fact sheet. I also understand that the agency may choose to defer work on my dwelling until the referenced area(s) have been remedied. If the agency proceeds with weatherization work, I agree to hold the agency, and its contractors, performing weatherization harmless for any future moisture or mold problems that are not directly attributable to weatherization work.

Weatherization client signature

Date

Agency Representative

Date

Original – Agency File *(always)*
Copy – Client *(when applicable)*

Attachment to 612.4 – Client Education Materials

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
<u>SPACE HEATING</u>	
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.
<u>HOT WATER</u>	
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
<u>APPLIANCES AND OTHER USES</u>	
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	27¢ per load for an electric dryer
<u>OTHER SUGGESTED ENERGY SAVING STEPS</u>	
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, do not 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.

Attachment to 614 – Weatherization Health and Safety Plan

Quicklinks (Hold **CONTROL** Key down and click the link):

[1.0 Policy](#) [2.0 Budgeting](#) [3.0 H&S Exp Limits](#) [4.0 IRMs](#) [5.0 Deferral](#) [6.0 Hazards/Form](#) [7.0 H&S Categories](#) [7.1 Heating](#) [7.2 Asbestos](#) [7.2a Asbestos in, wall, ceiling](#) [7.2b Asbestos Vermiculite](#) [7.2c Asbestos small](#) [7.5 Biologicals](#) [7.6 Bldg/Roof](#) [7.7 Code Compliance](#) [7.8 Combustion Gases](#) [7.9 Electrical](#) [7.10 VOCs/Pollutants](#) [7.11 Fuel Leaks](#) [7.12 Gas Ovens/Stove tops](#) [7.13 Hazardous Materials Disposal](#) [7.14 Injury Prevention](#) [7.15 Lead Based Paint](#) [7.16 Mold/Moisture](#) [7.17 Pests](#) [7.18 Radon](#) [7.19 Safety Devices](#) [7.20 H&S Concerns](#) [7.21 IAQ](#) [7.22 Window/Door](#) [7.23 OSHA](#) [7.24 Clothes Dryer Venting](#)

POLICY SUBMITTED WITH

Return Back to First Page: **Hold CONTROL –Click**

1.0 – GENERAL INFORMATION

Grantees are encouraged to enter additional information here that does not fit neatly in one of the other sections of this document.

REFERENCES

- Department of Energy Weatherization Assistance Program State Plan
- WAP Agreements
- DOE Weatherization Program Notice 17-7, 19-5
- Michigan Weatherization Field Guide
- CSPM 606.1 Program Requirements – WAP Auditing Tools

PURPOSE

The State Plan for the Weatherization Assistance Program (WAP) and this Weatherization Health and Safety Plan, which is an attachment to the Community Services Policy Manual Item 614, address health and safety (H&S) provisions for weatherization work in Michigan.

According to 10 CFR 440, the following criteria must be met to qualify as a Health and Safety measure.

- Actions must be taken to effectively perform weatherization work; or
- Actions are necessary as a result of weatherization work

POLICY

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

- H&S funds cover the cost of testing and the installation of measures.
- Health and Safety spending is limited to 50% of the total job cost, and the limit is reasonable in light of the primary energy conservation purpose of the Weatherization Assistance Program.

Health and Safety versus Energy Conservation Measures

Some measures can qualify as either a Health and Safety or an energy conservation measure, such as heating

system replacements. When the measure can be cost-justified through an audit, the measure must be treated as an energy conservation measure. When the measure is not cost-justified through an audit, it cannot be treated as an energy conservation measure.

Mandatory Health & Safety Measures

- Installation of smoke detectors shall be placed in accordance with all State Of Michigan and Local Fire/Building Codes. Smoke detectors must be tested to verify operation of installed alarms.
- Carbon Monoxide (CO) Alarm/Detector are required to comply with ASHRAE 62.2 version 2016 in all residences. CO Alarms/Detectors must be tested to verify operation of installed alarms.
- Implementation of program required ASHRAE 62.2 ventilation standard is required.
- Clothes dryers shall be vented to the exterior.

Emergency Procedures

Agency staff must immediately respond to all life threatening Health and Safety issues or situations identified as life threatening. Use the following immediate responses for life threatening issues identified from testing or from other hazards requiring an immediate response.

Procedures on how crews will handle life threatening hazards are observed: (Example: during testing of Combustion Gases when ambient CO is 70 ppm or greater, building structure issues, gas leaks from natural gas and/or propane, electrical fire hazards, electrical water hazards, and others hazards as identified)

- Terminate the inspection
- Immediately notify the homeowner – occupants of the need for all building occupants to evacuate the building.
- Leave the building
- Notify the appropriate emergency services from outside of the home
- Call the Manager for instructions

Reporting of Emergency Situation Requirements

Reporting the emergency is not an indication for action to be taken by the State's Weatherization Office, it is just a reporting requirement to track emergency situations.

Agency must submit an email to the MDHHS-BCAEO@michigan.gov within 24 hours to report the Health and Safety issues identified. The email should include job number, reason for the issue, and the remedy of the life threatening situation. In addition, please provide the time line and people involved in the response taken in the email. Full documentation on the issues identified, response taken with time line, results of response action, and notification email to the BCAEO must be uploaded in FACSPRO.

Reporting of Other Situation Requirements

Reporting the other situations that require the agency to notify law enforcement or child protective services is not an indication for action to be taken by the State's Weatherization Office, it is just a reporting requirement to track these situations. The agency must submit an email to the MDHHS-BCAEO@michigan.gov within 24 hours to report the other situation issues identified. The email should include job number, reason for the issue, and the entity that was notified.

Overall Approach to Health and Safety Measures

For each issue listed in the Health and Safety Plan:

- All work must meet the objective of the Michigan Weatherization Field Guide and/or the Authority Having Jurisdiction.
- Program and manufacturer approved materials and instructions must be used while installing any weatherization measures.
- When required, licensed professionals will be employed to install work and/or conduct tests. Workers must be qualified and adequately trained to implement the DOE Standard Work Specifications as well as State and local codes specific to the work being conducted (electrical, plumbing, etc.).
- Client education is only required where issue exists.
- User's manual for installed equipment will always be provided to client.
- Training to perform required testing and correctly apply work is implied.
- When a health and safety issue is cause for a deferral, the client must be notified in writing, including the conditions that must be met in order for weatherization to move forward.

Hazard Identification and Notification

A Health and Safety assessment must be performed to identify hazards in the dwelling. When hazards are identified, appropriate testing must be performed when required by the Health and Safety Plan. The client/landlord/property manager must be informed, in writing, of

- All testing results, regardless if they will lead to deferral (send by certified mail separately as necessary based on testing and weatherization timeline), and
- Any identified hazards that will lead to deferral.

The notification must be signed by the client and the assessor/auditor, a copy maintained in the client file, and a copy uploaded in FACSPRO.

Installation of Health and Safety Measures

All work must meet the objective of the Michigan Weatherization Field Guide and/or the Authority Having Jurisdiction. Program and manufacturer approved materials and instructions must be used while installing any weatherization measures.

Training

Agency must ensure training for workers to know when the performance of a certain task requires a licensed professional to meet the requirements of the authority having jurisdiction. Agency must ensure workers are qualified and adequately trained to implement the DOE Standard Work Specifications and codes specific to the work being conducted, such as electrical or plumbing.

Client Education

Client education is required when issues exists. For example, client education regarding drainage issues is only

required where drainage problems are identified.

Client education is also required on specific topics whether or not issues exist in that area. Those specific topics are included in the sections that follow.

ASHRAE Requirements

Implementation of program required ASHRAE 62.2 ventilation standard is required. Client refusal of mechanical ventilation, when evaluated and called for pursuant to the Standard, must result in deferral. Guidance on ASHRAE 62.2 2016 installation beyond the details of this H&S Plan can be found in the Michigan Weatherization Field Guide.

Health & Safety Concerns and Additional Guidance

2.0 – BUDGETING

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Grantees are encouraged to budget Health & Safety (H&S) costs as a separate category and, thereby, exclude such costs from the average cost per unit cost (ACPU) limitation. This separate category also allows these costs to be isolated from energy efficiency costs in program evaluations. Grantees are reminded that, if H&S costs are budgeted and reported under the program operations category rather than the H&S category, the related H&S costs must be included in the calculation of the ACPU and cost-justified through the approved energy audit.

Select which option is used below.

Separate Health and Safety Budget

Contained in Program Operations

Budget Management

- The rationale for performing each Health and Safety measure in an individual home and its relationship to the energy conservation measure that necessitated it must be clearly documented in the client file and FACSPRO.
- The average Health and Safety expenditure limit is 19.95% of the Program Operations budget.
- Health & Safety measures are charged to their own line item.
- Client file documentation must show costs in appropriate budget categories, including Health and Safety.
- Health and Safety funds cover the cost of testing, and the installation of measures around allowable Health and Safety measures as defined in section 7 of this document.
- Client education or training costs can be charged to Training and Technical Assistance budget.
- All funding sources that will be used to pay for Health and Safety measures to ensure that adequate funds are allocated must be identified.
- Code Compliance: DOE funds will not be used to meet existing code compliance issues unless the installation of a measure necessitates so.

3.0 – HEALTH AND SAFETY EXPENDITURE LIMITS

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Pursuant to [10 CFR 440.16\(h\)](#), Grantees must set H&S expenditure limits for their Program, providing justification by explaining the basis for setting these limits and providing related historical experience.

Low percentages should include a statement of what other funding is being used to support H&S costs, while larger percentages will require greater justification and relevant historical support. It is possible that these limits may vary depending upon conditions found in different geographical areas. These limits must be expressed as a percentage of the ACPU. For example, if the ACPU is \$5,000, then an average expenditure of \$750 per dwelling would equal 15 percent expenditures for H&S.

15 percent is not a limit on H&S expenditures but exceeding this amount will require ample justification. These funds are to be expended by the Program in direct weatherization activities. While required as a percentage of the ACPU, if budgeted separately, the H&S costs are not calculated into the per-house limitation. DOE strongly encourages using the table below in developing justification for the requested H&S budget amount. Each H&S measure the Grantee anticipates addressing with H&S funds should be listed along with an associated cost for each measure, and by using historical data the estimated frequency that each measure is installed over the total production for the year.

It is also recommend reviewing recent budget requests, versus expenditures to see if previous budget estimates have been accurate. The resulting "Total Average H&S Cost per Unit" multiplied by the Grantee's production estimate in the Annual File should correlate to the H&S budget amount listed in the Grantee's state plan.

Should a Grantee request to have more than 15 percent of Program Operations used for health and safety purposes, DOE will conduct a secondary level of review. DOE strongly encourages use of this H&S template and matrix to help expedite this process

Health and Safety Measures and Budget

The Average Health and Safety Expenditure Limit is 19.95% of the Program Operations budget. To ensure that program services concentrate on energy efficient measures and the costs must be reasonably justified, 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 to BCAEO for approval from technical staff before proceeding. 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.

In instances where the H&S measure that pushes the H&S cost over 50% of total job cost is an ASHRAE fan or system, the subgrantee may move forward on the project without review and permission from MDHHS-BCAEO technical staff. Items defined as Health and Safety measures and paid from the Health and Safety Line Item:

- Need not be cost-justified by the energy audit, and
- Are not included in the Average Cost Per Unit.

If the measure is an approved WAP expenditure and the audit justifies the costs with an SIR equal to or greater than 1.0, the measure must be performed and costs charged as an Energy Conservation Measure (ECM). If the measure is not an eligible ECM, the measure may be charged as a Health and Safety (H&S) measure. The measure may be considered for H&S repair or replacement only after it is determined that the measure is not cost-effective.

CSPM 614

http://www.michigan.gov/documents/dhs/CSPM_600_Series_215133_7.pdf CSPM 600 Series

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.

The following measures will be performed as Incidental Repair Measures (IRM) when an Energy Conservation Measure (ECM) is installed that they could be attached to as an IRM. In accordance to WPN 12-9, IRMs are measures necessary for the effective performance or preservation of installed ECMs. If the measures cannot be attached as an IRM to an ECM, the measures may be charged to Health and Safety as a stand alone measure.

- Moisture Repairs
- Vapor Retarder Installation
- Electrical Repairs

Repairing a small roof leak will be charged to Incidental Repair Measures when attic insulation is installed. To pay for a roof repair under Health & Safety, please see details in section 7.6 of this document.

CSPM 607

http://www.michigan.gov/documents/dhs/CSPM_600_Series_215133_7.pdf CSPM 600 Series

5.0 – DEFERRAL/REFERRAL POLICY

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Deferral of services may be necessary if H&S issues cannot be adequately addressed according to WPN 17-06 guidance. The decision to defer work in a dwelling is difficult but necessary in some cases. This does not mean that assistance will never be available, but that work must be postponed until the problems can be resolved and/or alternative sources of help are found. If, in the judgment of the auditor, any conditions exist which may endanger the health and/or safety of the workers or occupants, the unit should be deferred until the conditions are corrected. Deferral may also be necessary where occupants are uncooperative, abusive, or threatening. Grantees must be specific in their approach and provide the process for clients to be notified in writing of the deferral and what conditions must be met for weatherization to continue. Grantees must also provide a process for the client to appeal the deferral decision to a higher level in the organization.

Grantee has developed a comprehensive written deferral/referral policy that covers both H&S, and other deferral reasons?

Yes No

Where can this deferral/referral policy be accessed?

CSPM 609

http://www.michigan.gov/documents/dhs/CSPM_600_Series_215133_7.pdf CSPM 600 Series

6.0 – HAZARD IDENTIFICATION AND NOTIFICATION FORM(S)

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Documentation forms must be developed that include at a minimum: the client's name and address, dates of the audit/assessment and when the client was informed of a potential H&S issue, a clear description of the problem, a statement indicating if, or when weatherization could continue, and the client(s) signature(s) indicating that they understand and have been informed of their rights and options.

Documentation Form(s) have been developed and comply with guidance?

Yes No

Agencies have the option of using the standard Hazard Identification and Notification form to notify clients of potential issues defined in section 7 of this document. Agencies may elect to use an alternate form if that form

meets the minimum requirements of notification to the client as specified throughout section 7 of this document.

CSPM 614 Attachment B Hazard Identification and Notification Form

7.0 – HEALTH AND SAFETY CATEGORIES

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For each of the following H&S categories identified by DOE:

- *Explain whether you concur with existing guidance from WPN 17-07 and how that guidance will be implemented in your Program, if you are proposing an alternative action/allowability, or if the identified category will not be addressed and will always result in deferral. Alternatives must be comprehensively explained and meet the intent of DOE guidance.*
- *Where an Action/Allowability or Testing is “required” or “not allowed” through WPN 17-07, Grantees must concur, or choose to defer all units where the specific category is encountered.*
- *“Allowable” items under WPN 17-07 leave room for Grantees to determine if the category, or testing, will be addressed and in what circumstances.*
- *Declare whether DOE funds or alternate funding source(s) will be used to address the particular category.*
- *Describe the explicit methods to remedy the specific category.*
- *Describe what testing protocols (if any) will be used.*
- *Define minimum thresholds that determine minor and major repairs*
- *Identify minimum documentation requirements for at-risk occupants*
- *Discuss what explicit steps will be taken to educate the client, if any, on the specific category if this is not explained elsewhere in the Plan. Some categories, like mold and moisture, require client education.*
- *Discuss how training and certification requirements will be provided for the specific category. Some categories, like Lead Based Paint, require training.*
- *Describe how occupant health and safety concerns and conditions will be solicited and documented*

Grantees may include additional H&S categories for their particular Programs. Additional categories must include, at a minimum, all of the same data fields as the DOE-provided categories. Two additional tables have been created to utilize.

7.1 – Air Conditioning and Heating Systems

Back to First

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Air Conditioning Unallowable Measure Heating Unallowable Measure

Funding

DOE LIHEAP State Utility Other

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.

Budget Category Decisions: Perform a full DOE-approved energy audit prior to deciding how to categorize the cost of space heater repair or replacement. A space heater may only be replaced with Health and Safety funds if it is the primary heating unit. If the measure is an approved WAP expenditure and the audit justifies the costs with an SIR equal to or greater than 1.0, the measure must be performed and costs charged as an Energy Conservation Measure (ECM). If the measure is not an eligible ECM, the measure may be charged as a Health and Safety (H&S) measure.

How do you address unsafe or non-functioning primary heating/cooling systems?

When the Energy Auditor or any other weatherization employee encounters an unsafe or inoperable heating appliance during the heating season, if WAP funds are unable to correct the issue, weatherization work should not proceed until the condition is corrected.

Code Compliance and Inspection Requirements: Compliance with the DOE Space Heater Policy is required. Un-vented space heaters as the primary heat source must be replaced with vented space heaters prior to any weatherization activities. The purchase/installation of un-vented space heaters is prohibited. Installation of space heaters requires knowledge of appropriate industry standards and comply with the applicable building code(s) in the municipality where installation is taking place. Building permits shall be secured, where required for all space heater work. This is a program operations cost. The manufacturer approved initial start-up procedures must be followed before any heater is put into operation. Agencies are reminded that even licensed heating contractors may not be aware of the stringent requirements of the Weatherization Program, so their work should be reviewed by Program staff. These requirements should be sent to the contractor prior to their installation of a heating system as part of their contract with the agency. Safety inspections related to the space heater should include, but not be limited to, a check for adequate floor protection, and code-compliant clearances to walls and other combustible materials. Even though many vented space heaters are manufactured with spill switches, it is still a requirement that a worst-case depressurization draft test be performed on all vented units.

Electric Space Heaters: DOE will not permit any DOE-funded weatherization work other than minor repairs on electric space heaters. This does not preclude the use of other funding sources for the replacement or major repair of electric space heaters, but the Department does not encourage it because of:

- Lower output ratings (size);
- Risk of fire hazards; and,
- Inadequate electrical systems in older homes, which frequently cannot safely carry the power required to operate an electric heater.

Work on such systems may make local agencies liable for inadequate electric wiring and any damages that result.

Fireplaces – Special Considerations: Fireplaces present special hazards that are affected by weatherization. If draft is poor, smoke may downdraft into the living space causing poor indoor air quality. It is likely the occupants will ventilate in these situations. Near the end of a wood fire, glowing coals will remain, radiating heat, while the draft lowers and allows the top of the chimney to cool, further reducing draft. The reduced oxygen available to the glowing coals causes production of CO without the smoke that encourages space ventilation. This is a dangerous situation as the CO enters the living space due to the lowered draft, causes drowsiness of occupants, and sometimes worse. For this reason it is extremely important to make sure there is a CO alarm installed in this combustion zone and occupants are educated to the danger signs and what to do.

Inspection/Evaluation: Assessing solid fuel fired appliances involves inspecting the venting/chimney and the overall installation to ensure it adheres to the applicable code: NFPA 211 or other as determined by the authority having jurisdiction. Appliances should be inspected pre- and post-weatherization.

Conduct pre- and post- weatherization worst case CAZ depressurization testing in spaces having a fireplace. If fireplaces are left operational, the vent must meet code or the home cannot be

weatherized. Fireplaces may be permanently disabled if it is determined that the client will not use it or it is obviously inadequate.

To evaluate operation of other combustion appliances, the blower door can be set to run at 300 CFM (set up as for depressurization testing), or other Grantee-approved flow, to mimic the airflow

How do you address unsafe or non-functioning secondary heating systems, Including unvented secondary space heaters?
<p>The secondary system is defined as the system that is employed only in extreme weather. Replacement or installation of secondary units is not allowed.</p> <p>Unsafe secondary units, including space heaters, must be repaired, removed or rendered inoperable, or deferral is required.</p> <p>For further information on secondary Unvented Gas- and Liquid-Fueled Space Heaters, see section above.</p>
Indicate Documentation Required for At-Risk Occupants
<ul style="list-style-type: none"> • Any documentation that supports the existence of an at-risk occupant will be included in the client file. All reasonable efforts will be made to ensure the safety of at-risk occupants. <ul style="list-style-type: none"> ○ Documentation with signature from the client’s physician indicating a client’s health is at-risk without the installation of the air-conditioning system is necessary to prove the client is defined as “at-risk”.
Testing Protocols
Refer to the Michigan Weatherization Field Guide for appropriate testing protocols as detailed in chapters 1 and 8.
Client Education
<p>Client education is provided during the energy audit, installation of measures, and during the QCI inspection.</p> <p>Client Education</p> <ul style="list-style-type: none"> • When deferral is necessary, provide information to the client, in writing, describing conditions that must be met in order for weatherization to commence. A copy of this notification must also be placed in the client file. • Discuss appropriate use and maintenance of units. • Provide all paperwork and manuals for any installed equipment. • Discuss and provide information on proper disposal of bulk fuel tanks when not removed as part of the weatherization work. • Where combustion equipment is present, provide safety information including how to recognize depressurization. • Dirty or non-existent furnace filters shall be evaluated for replacement. Clients shall be instructed in proper intervals for replacement of the filters.
Training
<ul style="list-style-type: none"> • Weatherization Assistance Program Health and Safety policy training on allowable activities. • Licensing and/or certification for HVAC installers as required by authority having jurisdiction (AHJ). • CAZ depressurization test and inspection training.

7.2 – Asbestos – All

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What is the blower door testing policy when suspected Asbestos Containing Material (ACM) is identified?

When friable Asbestos Containing Material (ACM) is suspected, in the home, the blower door test will not be conducted to avoid disturbing friable ACM particles and the work will be deferred until all friable ACMs have been safely removed and disposed of by an authorized agency. “Friable” means the material can be crumbled, pulverized, or reduced to powder by the pressure of an ordinary human hand. In cases where a home was deferred due to ACM and then later approached for weatherization, the client must provide documentation that a certified professional performed the removal or remediation of asbestos and the client must provide results of the Air Quality Testing (to ensure air quality is safe for workers). Michigan follows the EPA guidelines that ACM is defined as material containing 1% or more of asbestos. If an agency tests potential ACM and determines that it contains levels of asbestos between 0% and 1%, the staff or contractor interacting with the material must wear personal protective equipment.

7.2a – Asbestos - in siding, walls, ceilings, etc.

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Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

The existence of asbestos siding that is in good condition does not prevent installing dense-pack insulation from the exterior. Siding may be removed and reinstalled in order to perform the ECM, and the associated costs may be charged as part of the ECM. General abatement of asbestos siding or replacement with new siding is not an allowable H&S cost. If a site is suspected to have asbestos and is unable to concur this guidance, the project shall be deferred until friable asbestos materials have been safely removed and disposed of by an authorized agency and indoor air quality testing shows workers can proceed in a safe environment.

How do you address suspected ACM’s in siding, walls, or ceilings that will be disturbed through the course of weatherization work?

Take all reasonable and necessary precautions to prevent asbestos contamination in the home.

Asbestos

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.

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.

<https://www.energy.gov/eere/wipo/weatherization-program-guidance>

Testing Protocols

<ul style="list-style-type: none"> Asbestos Hazard Emergency Response Act of 1986 (AHERA) sample collection and testing is allowed and must be conducted by a certified tester.
Client Education
<ul style="list-style-type: none"> Referral to the local Health Department is recommended. Instruct clients in writing not to disturb suspected ACM. Provide asbestos safety information to the client. Formally notify client in writing of results if testing was performed. When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.
Training and Certification Requirements
<ul style="list-style-type: none"> Training will include how to recognize asbestos insulation, potential asbestos containing material found in a home, and existing vermiculite that may contain asbestos. As well as how to avoid disturbing asbestos in any way.

7.2b – Asbestos - in vermiculite					Back to First
Concurrence, Alternative, or Deferral					
Concurrence with Guidance <input type="checkbox"/>		Alternative Guidance <input checked="" type="checkbox"/>		Results in Deferral <input type="checkbox"/>	
Funding					
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>	
<p>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.</p>					
How do you address suspected ACM's in vermiculite that will be disturbed through the course of weatherization work?					
<p>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. Disposal Procedures shall be in compliance with all local, state and federal EPA requirements:</p> <ul style="list-style-type: none"> When vermiculite is present, assume it contains asbestos unless testing determines otherwise. Do not perform a blower door test to avoid disturbing the vermiculite. Use proper respiratory protection while in areas containing vermiculite. Encapsulation by an appropriately trained asbestos control professional is allowed. Removal is not allowed. When deferral is necessary due to asbestos, occupant must provide documentation that a certified professional performed the remediation and an air quality test was performed before work continues. If this testing determines the vermiculite does not contain asbestos, or the vermiculite is encapsulated, the project may move forward. Otherwise, this project shall be deferred to the Local Health Department or other EPA affiliate to determine presence of asbestos. 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. 					

Testing Protocols
<ul style="list-style-type: none"> • Asbestos Hazard Emergency Response Act of 1986 (AHERA) sample collection and testing is allowed and must be conducted by a certified tester. • Baseline environmental asbestos sampling is an allowable cost.
Client Education
<ul style="list-style-type: none"> • Referral to the local Health Department is recommended. • Instruct clients in writing not to disturb suspected ACM. • Provide asbestos safety information to the client. • Formally notify client in writing of results if testing was performed. • When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.
Training and Certification Requirements
<ul style="list-style-type: none"> • Training will include how to recognize asbestos insulation, potential asbestos containing material found in a home, and existing vermiculite that may contain asbestos. As well as how to avoid disturbing asbestos in any way. • AHERA or state certification to conduct testing. • AHERA or other appropriate asbestos control professional certification/training for encapsulation.

7.2c – Asbestos - on pipes, furnaces, other small covered surfaces				
				Back to First
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
<p>How do you address suspected ACM's (e.g., pipes, furnaces, other small surfaces) that will be disturbed through the course of weatherization work?</p>				

<ul style="list-style-type: none"> • Assume asbestos is present in suspect covering materials. • When friable suspected ACMs are present, unless testing determines otherwise, take precautionary measures as if they contain asbestos. • Do not conduct a blower door test to ensure the friable suspected ACM is not disturbed. • In cases where the suspected ACM is friable, 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. • Prior to weatherization, encapsulation is allowed by an appropriately trained asbestos control professional and should be conducted prior to blower door testing if the materials are friable. • This project shall be deferred to the Local Health Department or other EPA affiliate to determine presence of asbestos. • If site is found to have friable asbestos, this project shall be deferred until all friable asbestos materials have been safely removed and disposed of by an authorized agency. • Abatement of ACM within this section is allowable on a case-by-case basis. Requests must be submitted to BCAEO before work is completed and the following items will be considered: <ul style="list-style-type: none"> ○ Cost of the abatement of asbestos; if the ACM abatement costs remain within 50% of the total job cost, the abatement may be approved by BCAEO ○ Scope of the asbestos; ACM must be isolated to a specific location as noted in the title of this section <ul style="list-style-type: none"> ▪ Approval of abatement under DOE H&S will not be considered in the cases of vermiculite or siding ○ After review of the request, BCAEO will issue a decision to the agency. Only after an approval is issued from BCAEO may the agency proceed with this work.
<p>Testing Protocols</p>
<ul style="list-style-type: none"> • Asbestos Hazard Emergency Response Act of 1986 (AHERA) sample collection and testing is allowed and must be conducted by a certified tester.
<p>Client Education</p>
<ul style="list-style-type: none"> • Referral to the local Health Department is recommended. • Instruct clients in writing not to disturb suspected ACM. • Provide asbestos safety information to the client. • Formally notify client in writing of results if testing was performed. • When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.
<p>Training and Certification Requirements</p>
<ul style="list-style-type: none"> • Training will include how to recognize asbestos insulation, potential asbestos containing material found in a home, and existing vermiculite that may contain asbestos. As well as how to avoid disturbing asbestos in any way. • AHERA or other appropriate asbestos control professional certification/training is required to abate the ACM.

7.5 – Biologicals and Unsanitary Conditions (odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.)				
				Back to First
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Unallowable Measure <input type="checkbox"/>				
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
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.				
What guidance do you provide Subgrantees for dealing with biological and/or unsanitary conditions in homes slated for weatherization?				
<p>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.</p> <ul style="list-style-type: none"> • Client education and deferral to local Housing Funded programs and Health Department. • Addressing bacteria and viruses is not an allowable cost. • See Mold and Moisture section for more information. 				
Testing Protocols				
Sensory inspection followed with issuing a Notice of Potential Hazard defining deferring all weatherization work until condition has been eliminated.				
Client Education				
<ul style="list-style-type: none"> • Inform client in writing of observed conditions. • Provide information on how to maintain a sanitary home. EPA handout on remedying Mold and mildew issues when applicable. • When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence. 				
Training				
<p>Through local Health Department and the State Extension office.</p> <ul style="list-style-type: none"> • How to recognize unsafe conditions and when to defer. • Safe work practices when encountering such conditions. 				

7.6 – Building Structure and Roofing			
			Back to First
Concurrence, Alternative, or Deferral			
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>	
Funding			

DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
Incidental and minor repairs, as defined below, are allowable. Otherwise, project will be deferred until area of repairs can be corrected or eliminated through other funding sources or incidental repairs.				
What guidance do you provide Subgrantees for dealing with structural issues (e.g., roofing, wall, foundation) in homes slated for weatherization?				
<ul style="list-style-type: none"> • Building rehabilitation is beyond the scope of the Weatherization Assistance Program. • A visual inspection shall be followed up with the issuance of the appropriate Notice of potential hazard. • Homes that require more than minor repairs must be deferred, see the incidental repair policy CSPM 607. • See Mold and Moisture, Code Compliance, and Pests sections for more information. • Ensure that access to the portions of the home where weatherization will occur are safe for entry and performance of assessments, work, and inspections. 				
How do you define “minor” or allowable structure and roofing repairs, and at what point are repairs considered beyond the scope of weatherization?				
Incidental Repairs for Minor work				
<ul style="list-style-type: none"> • DOE funds will be used for incidental repairs of Building Structure and Roofing, see the incidental repair policy CSPM 607. 				
Health & Safety Funds for Minor Work				
<ul style="list-style-type: none"> • If no attic insulation is installed and the repair cannot be an incidental repair, then a minor repair may be done under Health & Safety, if: <ul style="list-style-type: none"> ○ It resolves a bulk water intrusion issue that is the cause of visible biological growth, and; ○ The limit of spending on such a repair under Health & Safety is \$250, and; ○ The H&S roof repair is well documented with written explanation and photos of the biological growth in the client file 				
Beyond Scope of Weatherization				
Project will be deferred until area of repairs can be corrected through other funding sources. 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.				
If priority lists are used, and these repairs are designated as Incidental Repairs, at what point is a site-specific audit required?				
N/A				
Client Education				
Energy Auditors shall inform the residents of the potential hazard and recommendation to seek remedy of the condition.				
Training				
How to identify structural and roofing issues.				

7.7 – Code Compliance			Back to First
Concurrence, Alternative, or Deferral			
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>	
Correction of preexisting code compliance issues is not an allowable cost other than where triggered by weatherization measures being installed in a specific room or area of the home.			
When correction of preexisting code compliance issues is triggered and paid for with WAP funds, cite specific code requirements with reference to the weatherization measure(s) that triggered the code compliance issue in the client file.			
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.			
Funding			
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/> Other <input type="checkbox"/>
What guidance do you provide Subgrantees for dealing with code compliance issues in homes receiving weatherization measures?			
<ul style="list-style-type: none"> • When identified Code violations shall be listed on a Notice of Potential Hazard, and issued to the occupant. • A deferral of weatherization work will occur until the required Code compliance is met. • Referrals can be made to the customer to contact the local building inspection agents and item of Code incorrectness listed on the Notice of Potential Hazard. • When a condition cannot be corrected within the Incidental Repair costs category, work should be deferred. 			
What specific situations commonly trigger code compliance work requirements for your network? How are they addressed?			
<ul style="list-style-type: none"> • Follow State and local codes while installing weatherization measures. • Condemned properties and properties where “red tagged” H&S conditions exist that cannot be corrected under this guidance must be deferred. • If code issues are cause for deferral, or if code compliance work is triggered by weatherization work the agency must cite the specific code in the client file. 			
Client Education			
<ul style="list-style-type: none"> • Energy Auditors shall inform the residents of the potential hazard and recommendation to seek remedy of the condition. • Inform client in writing of observed code compliance issues when it results in a deferral. • When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence. 			
Training			

- Code Compliance Training
 - IE. Michigan Residential Building License Code Compliance Training

7.8 – Combustion Gases				
Back to First				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input type="checkbox"/>		Alternative Guidance <input checked="" type="checkbox"/>		Results in Deferral <input type="checkbox"/>
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
<p>Costs related to replacing an appliance are determined by SIR value. If SIR greater than 1, charge to Energy Conservation Measure (ECM) and if SIR is less than 1, charge to Health and Safety budget.</p>				
Testing Protocols				
<ul style="list-style-type: none"> Health and Safety protocol testing provides detection with air sampling equipment to determine elevated levels of combustion gases and their byproducts. When testing indicates a problem, correct the problem. When elevated levels are detected, all weatherization work is suspended until a safe environment is restored. When weatherization funds cannot address the listed Health and Safety condition, a referral is made to local housing programs and emergency fund sources. Combustion safety testing is required when combustion appliances are present. Test naturally drafting appliances for spillage and CO during CAZ depressurization testing pre- and post-weatherization and before leaving the home on any day when work has been done that could affect draft (e.g., tightening the home, adding exhaust). Agency will complete and review the Test In and Test Out form for the client file. Inspect venting of combustion appliances and confirm adequate clearances. Check DOE-approved audit to determine if the appliance can be justified as an ECM prior to replacement as an H&S measure. 				

Carbon Monoxide

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.

**Required Actions in Response to Ambient CO Measurements
(from ANSI/BPI-1200, Section 7.3.3.3)**

70 ppm or greater	36 ppm-69 ppm	9 ppm- 35 ppm
<ul style="list-style-type: none"> • Terminate the inspection. • Notify the homeowner - occupant of the need for all building occupants to evacuate the building. • Leave the building and the appropriate emergency services shall be notified from outside the home. 	<ul style="list-style-type: none"> • Advise the homeowner - occupant that elevated levels of ambient CO have been detected. • Open windows and doors. Recommend that all possible sources of CO be turned off immediately. • Where it appears that the source of CO is a permanently installed appliance, recommend that the appliance be turned off and advise homeowner – occupant to contact a qualified professional. 	<ul style="list-style-type: none"> • Advise the homeowner - occupant that CO has been detected. • Recommend that all possible sources of CO be checked and windows and doors opened. • Where it appears that the source of CO is a permanently installed appliance, advise the homeowner - occupant to contact a qualified professional.

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. State of MI Mechanical rules and regulations must be adhered to.
- 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. For further information on required CAZ testing, see CSPM 606.2.

How are crews instructed to handle problems discovered during testing, and what are the specific protocols for addressing hazards that require an immediate response?

Emergency Procedures

Agency staff must immediately respond to all life threatening Health and Safety issues or situations identified as life threatening. Use the following immediate responses for life threatening issues identified from testing or from other hazards requiring an immediate response.

Procedures on how crews will handle life threatening hazards are observed: (Example: during testing of Combustion Gases when ambient CO is 70 ppm or greater, building structure issues, gas leaks from natural gas and/or propane, electrical fire hazards, electrical water hazards, and others hazards as identified)

- Terminate the inspection
- Immediately notify the homeowner – occupants of the need for all building occupants to evacuate the building.
- Leave the building
- Notify the appropriate emergency services from outside of the home
- Call the Manager for instructions

Reporting of Emergency Situation Requirements

Reporting the emergency is not an indication for action to be taken by the State’s Weatherization Office, it is just a reporting requirement to track emergency situations.

Agency must submit an email to the MDHHS-BCAEO@michigan.gov within 24 hours to report the Health and Safety issues identified. The email should include job number, reason for the issue, and the remedy of the life threatening situation. In addition, please provide the time line and people involved in the response taken in the email. Full documentation on the issues identified, response taken with time line, results of response action, and notification email to the BCAEO must be uploaded in FACSPRO.

Reporting of Other Situation Requirements

Reporting the other situations that require the agency to notify law enforcement or child protective services is not an indication for action to be taken by the State’s Weatherization Office, it is just a reporting requirement to track these situations. The agency must submit an email to the MDHHS-BCAEO@michigan.gov within 24 hours to report the other situation issues identified. The email should include job number, reason for the issue, and the entity that was notified.

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.
- Provide client with combustion safety and hazards information.

Training

- State of Michigan trains inspection candidates on ways to determine air samples which would identify potentially hazardous condition within and around the residential dwelling.
- How to perform appropriate testing, determine when a building is excessively depressurized, and the difference between air free and as-measured CO.
- CO action levels.

7.9 – Electrical			Back to First
Concurrence, Alternative, or Deferral			
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>	
Funding			
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/> Other <input type="checkbox"/>
DOE Funds will not be used beyond incidental repairs or a H&S Minor repair as defined below. When the H&S of the occupant/worker(s) is at risk, minor repairs, as defined below, are allowed when necessary for weatherization measures. 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.			
What guidance do you provide Subgrantees for dealing with electrical hazards, including knob & tube wiring, in homes slated for weatherization?			
<ul style="list-style-type: none"> • Projects that can eliminate knob and tube as an IRM within an ECM or a minor repair can be done. • If necessary, sufficient over-current protection and damming (if required) prior to insulating building components containing knob and tube wiring, as required by the AHJ, may be completed. • If the knob and tube cannot be eliminated or dammed in the ways listed above, the project must be deferred. It is required for the project to be deferred until a licensed electrical inspection is conducted and the electrical upgrade is confirmed. 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. • If aluminum wiring is present, work on the home will be stopped until the suspect wiring is inspected and determined to be safe by a licensed electrician. After energy retrofit is completed, wiring will be re-inspected by a licensed electrician. 			
How do you define “minor” or allowable electrical repairs, and at what point are repairs considered beyond the scope of weatherization?			
Minor or allowable electrical repairs under \$500.00 to complete weatherization is allowable. Repairs over \$500.00 is beyond the scope of weatherization.			
If priority lists are used, and these repairs are designated as Incidental Repairs, at what point is a site-specific audit required?			
N/A			
Testing			
<ul style="list-style-type: none"> • Visual inspection for presence and condition of knob-and-tube wiring. • Check for alterations that may create an electrical hazard. • Voltage drop and voltage detection testing are allowed. 			
Client Education			
<ul style="list-style-type: none"> • 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. • When electrical issues are the cause of a deferral, provide information to client on over-current protection, overloading circuits, and basic electrical safety/risks. 			

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

7.10 – Formaldehyde, Volatile Organic Compounds (VOCs), Flammable Liquids, and other Air Pollutants		Back to First
Concurrence, Alternative, or Deferral		
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>
Funding		
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input type="checkbox"/>
<p>What guidance do you provide Subgrantees for dealing with formaldehyde, VOCs, flammable liquids, and other air pollutants identified in homes slated for weatherization?</p> <ul style="list-style-type: none"> Indoor pollution sources that release gases or particles into the air are a primary cause of indoor air quality problems in homes. Inadequate ventilation can increase indoor pollutant levels by not bringing in enough fresh outdoor air to dilute emissions from indoor sources and by not carrying indoor air pollutants out of the home. High temperature and humidity levels can also increase concentrations of some pollutants. Removal of pollutants is allowed and is required if they pose a risk to workers. If pollutants pose a risk to workers and removal cannot be performed or is not allowed by the client, the unit must be deferred. 		
Testing Protocols		
Sensory inspection.		
Client Education		
<ul style="list-style-type: none"> A Notice of Potential Hazard shall be issued to the occupant. When air quality is at issue, Indoor Air Quality form shall be issued to the occupant. Inform client in writing of observed hazardous condition and associated risks. Provide client written materials on safety issues and proper disposal of household pollutants. When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence. 		
Training		
How to recognize potential hazards and when removal is necessary and when deferral is required.		

7.11 – Fuel Leaks		Back to First
<i>(please indicate specific fuel type if policy differs by type)</i>		
Concurrence, Alternative, or Deferral		
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>
Funding		
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input type="checkbox"/>
Remediation Protocols		

<ul style="list-style-type: none"> • When a minor gas leak is found on the utility side of service, the utility service must be contacted before work may proceed. • WAP may repair fuel leaks that are the responsibility of the client (vs. the utility) before weatherizing a unit. • Notify utilities and temporarily halt work when leaks are discovered that are the responsibility of the utility to address.
How do you define allowable fuel leak repairs, and at what point are repairs considered beyond the scope of weatherization?
<ul style="list-style-type: none"> • WAP may address fuel leaks up to \$300 in cost.
Testing
<ul style="list-style-type: none"> • Test exposed gas lines for fuel leaks from utility coupling into, and throughout, the home. • Conduct sensory inspection on bulk fuels to determine if leaks exist.
Client Education
Inform clients in writing if fuel leaks are detected.
Training
Fuel leak testing.

7.12 – Gas Ovens / Stovetops / Ranges	Back to First
Concurrence, Alternative, or Deferral	
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/> Results in Deferral <input type="checkbox"/>
Funding	
DOE <input checked="" type="checkbox"/>	LIHEAP <input type="checkbox"/> State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input type="checkbox"/>
What guidance do you provide Subgrantees for addressing unsafe gas ovens/stoves/ranges in homes slated for weatherization?	
<ul style="list-style-type: none"> • When testing indicates a problem, entities may perform standard maintenance on or repair gas cooktops and ovens. • If repair listed above does not address the issue, all work shall be deferred when the CO reading for the gas oven exceeds 225 ppm or any of the range top burners exceed 100 ppm. • A Notice of Potential hazard shall be issued to the occupant. • Replacement is not allowed. 	
Testing Protocols	
<ul style="list-style-type: none"> • Visual inspection and CO testing for ovens and stovetop burners 	
Client Education	
Inform clients of the importance of using exhaust ventilation when cooking and the importance of keeping burners clean to limit the production of CO.	
Training	
<ul style="list-style-type: none"> • Training on how to test the burners for safe combustion and gas leaks in the gas piping in and around the range and oven and seal leaks. • Training on measuring CO at the oven in undiluted flue gases. 	

7.13 – Hazardous Materials Disposal [Lead, Refrigerant, Asbestos, Mercury (including CFLs/fluorescents), etc.] <i>(please indicate material where policy differs by material)</i>				
				Back to First
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
Allowability				
<ul style="list-style-type: none"> Hazardous Waste Materials generated in the course of weatherization work shall be disposed of according to all local laws, regulations and/or Federal guidelines, as applicable. When hazard materials (refrigerant, mercury thermostats, lead paint dust/chips, etc.) are generated in the course of weatherization work, proper disposal is required, and removal/disposal costs must be included within the Health and Safety line item. 				
Client Education				
Inform client in writing of hazards associated with hazardous waste materials being generated/handled in the home.				
Training				
<ul style="list-style-type: none"> Appropriate Personal Protective Equipment (PPE) for working with hazardous waste materials. Disposal requirements and locations. Health and environmental risks related to hazardous materials. 				
Disposal Procedures and Documentation Requirements				
<ul style="list-style-type: none"> Hazardous Waste Materials generated in the course of weatherization work shall be disposed of according to all local laws, regulations and/or Federal guidelines, as applicable. When hazard materials (refrigerant, mercury thermostats, lead paint dust/chips, etc.) are generated in the course of weatherization work, proper disposal is required, and removal/disposal costs must be included within the Health and Safety line item. Document proper disposal requirements in contract language with responsible party. Refer to Lead and Asbestos sections for more information on those topics. 				

7.14 – Injury Prevention of Occupants and Weatherization Workers (Measures such as repairing stairs and replacing handrails)				
				Back to First
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>

When necessary to effectively weatherize the home, workers may make minor repairs and installations, as defined by the Grantee; otherwise these measures are not allowed.

What guidance do you provide Subgrantees regarding allowable injury-related repairs (e.g., stairs, handrails, porch deck board)?

- Inspect for dangers that would prevent weatherization.
- A Notice of Potential hazard shall be issued to the occupant.

How do you define “minor” or allowable injury prevention measures, and at what point are repairs considered beyond the scope of weatherization? Quantify “minor” or allowable injury prevention measures.

Injury prevention refers to minor installations needed to let workers safely access work areas, like replacing a missing or unsafe stair tread on the stairs leading to the attic. This would only be done if work was being done in the attic.

Minor repairs needed that are beyond the scope of weatherization must not exceed are defined as under \$200 per job. Repairs that exceed this amount are considered beyond the scope of weatherization.

Training

Hazard identification.

7.15 – Lead Based Paint					Back to First
Concurrence, Alternative, or Deferral					
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>			
Funding					
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>	
DOE funds are being used.					
<ul style="list-style-type: none"> • Only those costs directly associated with the testing and lead safe practices for surfaces directly disturbed during weatherization activities are allowable. 					
Safe Work Protocols					
Lead Paint					
Lead paint removal is not an allowable activity under the Weatherization Assistance Program.					
To minimize risks to clients and weatherization personnel:					
<ul style="list-style-type: none"> • Provide clients and workers with Renovate Right Brochure available at www.epa.gov/lead. <ul style="list-style-type: none"> • Use lead safe weatherization practices when disturbing lead based paint. • Staff and contractors shall assume that any paint on windows and doors contains lead, unless it has been verified otherwise. 					
All local weatherization operator staff, QC Inspectors, contractors, and crews, must be in compliance with:					
<ul style="list-style-type: none"> • 					

- All weatherization contractors, crew persons, Energy Auditors and QC Inspectors are to be, at a minimum, in compliance with EPA LRRP Rule Requirements. Most individuals in these roles must be trained and certified in LRRP or Lead Safe Weatherization (LSW). See Training Requirements section for further details.
- All Federal, state, and local regulations
- OSHA rules for worker safety
- All State and local rules for waste disposal

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

- LRRP work practices shall be utilized.

If working on a unit with lead paint, always defer to the LRRP rules, regulations and training. In general remember, that as you scrape, drill, cut, open walls, etc., you are creating dust. You can keep dust down by using the right tools and following some simple practices that minimize and control the spread of dust.

- Control the spread of dust per EPA's Renovation, Repair and Painting standards:
 - You must keep the work area closed off from the rest of the home. The work area must be sufficiently isolated and maintained to prevent the escape of dust or debris
 - You must ensure that all personnel, tools, and all other items exiting the work area are free of dust and debris. Don't track dust out of the work area.
- Use work practices that minimize dust:
 - You should mist areas before sanding, scraping, drilling and cutting to keep the dust down (except within 1 foot of live electrical outlets)
 - You should score paint with a utility knife before separating components
 - You should pry and pull apart components instead of pounding and hammering
 - You must keep components that are being disposed of in the work area until they are wrapped securely in heavy plastic sheeting or bagged in heavy duty plastic bags. Once wrapped or bagged, remove them from the work area and store them in a safe area away from the residents
- Crews must follow EPA's Lead; Renovation, Repair and Painting Program (RRP) when working in pre-1978 housing unless testing confirms the work area to be lead free.
- Deferral is required when the extent and condition of lead-based paint in the house would potentially create further H&S hazards.
- Only those costs directly associated with the testing and lead safe practices for surfaces directly disturbed during weatherization activities are allowable.

Testing Protocols
<ul style="list-style-type: none"> • Testing to determine the presence of lead in paint that will be disturbed by WAP measure installation is allowed with EPA-approved testing methods. • Testing methods must be economically feasible and justified. • Job site set up and cleaning verification by a Certified Renovator is required. • BCAEO's monitors will verify that crews are using lead safe work practices during monitoring.
Client Education
<ul style="list-style-type: none"> • Issue EPA pamphlet or safe work practices around the home. • Follow pre-renovation education provisions for LRRP. • When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.
Training and Certification Requirements
<p>LSW training is administered through the State of Michigan WAP and is optional when a staff does not have a LRRP Certification. LRRP training provided through EPA accredited trainers.</p> <ul style="list-style-type: none"> • All employees and contractors working on pre-1978 homes must receive training to install measures in a lead-safe manner in accordance with the SWS and EPA protocols, and installation must be overseen by an EPA Certified Renovator. • Grantee Monitors and Inspectors must be Certified Renovators. • Lead Safe Work and Lead Renovator Repair Painting Training <ul style="list-style-type: none"> ○ All employees and contractors working on pre-1978 homes must receive training to install measures in a lead-safe manner in accordance with the SWS and EPA protocols, and installation must be overseen by an EPA Certified Renovator. Crews must follow EPA's Lead; Renovation, Repair and Painting Program (LRRP) when working in pre-1978 housing unless testing confirms the work area to be lead free. Different roles in Weatherization have different requirements for Lead Safe Work (LSW) or LRRP training and certification. All required training/certification must be completed within 180 days of the date they are hired. Requirements are as follows: <ul style="list-style-type: none"> ▪ Energy Auditors and Quality Control Inspectors <ul style="list-style-type: none"> • Individuals in these roles must receive either LSW or LRRP training and must follow EPA rules. ▪ Mechanical, Electrical and Plumbing Contractors <ul style="list-style-type: none"> • Individuals in this role must follow EPA rules, but there are no training requirements for individuals beyond those listed generally in this section. ▪ Shell Contractors and Crews <ul style="list-style-type: none"> • Individuals in these roles must receive either LSW or LRRP training and must follow EPA rules.
Documentation Requirements
<p>Documentation in the contractor file must include Certified Renovator certification; any training provided on-site; description of specific actions taken; lead testing and assessment documentation; and, photos of site and containment set up. Include the location of photos referenced if not in file. Client files include photos and Lead Safe Form.</p>

7.16 – Mold and Moisture

(Including but not limited to: drainage, gutters, down spouts, extensions, flashing, sump pumps, dehumidifiers, landscape, vapor retarders, moisture barriers, etc.)

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Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

What guidance do you provide Subgrantees for dealing with moisture related issues (e.g., drainage, gutters, down spouts, moisture barriers, dehumidifiers, vapor barrier on bare earth floors) in homes slated for weatherization?

Mold & Moisture Assessment

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 problems. Excessive moisture in a home provides an 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.

Mold and Moisture -- Including but not limited to: drainage, gutters, down spouts, extensions, flashing, sump pumps, dehumidifiers, landscape, leaking roofs, vapor retarders, moisture barriers, etc.

All dwellings shall be checked for previous or existing mold and moisture problems. Audit procedures shall include a mold and moisture assessment, including a mold protocol or checklist. The assessment shall be a visual review that includes these four categories:

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

If a vapor barrier cannot be installed in a crawlspace home, the job must be deferred.

Testing

- Visual assessment including exterior drainage.
- Diagnostics such as moisture meters are recommended pre-weatherization and at the final inspection.
- Mold testing is not an allowable cost.

How do you define “minor” or allowable moisture-related measures, and at what point is work considered beyond the scope of weatherization?

<ul style="list-style-type: none"> • Limited water damage repairs that can be addressed by weatherization workers are allowed when necessary in order to weatherize the home and to ensure the long-term stability and durability of the measures. • Source control (i.e. correction of moisture and mold creating conditions) is allowed when necessary in order to weatherize the home and to ensure the long-term stability and durability of the measures. Source control is independent of latent damage and related repairs. • Where severe Mold and Moisture issues cannot be addressed, deferral is required. • Mold cleanup is not an allowable H&S cost. • Surface preparation where weatherization measures are being installed (e.g., cleaning mold off window trim in order to apply caulk) must be charged as part of the ECM, not to the H&S budget category. <p>Minor or allowable moisture-related measures are considered costs up to \$250.</p>
Client Education
<ul style="list-style-type: none"> • Visual inspection and issuance of EPA guidelines/pamphlet for remedy. • Provide client written notification and disclaimer on mold and moisture awareness. • Provide information on importance of cleaning and maintaining drainage systems. • Provide information on proper landscape design and how this impacts site drainage and moisture control. • When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.
Training
<ul style="list-style-type: none"> • National curriculum on mold and moisture or equivalent. • How to recognize drainage issues.

7.17 – Pests	Back to First
Concurrence, Alternative, or Deferral	
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/> Results in Deferral <input checked="" type="checkbox"/>
Funding	
DOE <input type="checkbox"/>	LIHEAP <input type="checkbox"/> State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input type="checkbox"/>
What guidance do you provide Subgrantees for dealing with pests and pest intrusion prevention in homes slated for weatherization?	
<ul style="list-style-type: none"> • All work will be deferred until all infestation of pests are eliminated from work site because it poses H&S concern for workers. • Issue a Notice of Potential Hazard to the occupant. 	
Define Pest Infestation Thresholds, Beyond Which Weatherization Is Deferred	
When pests and their byproducts are present and pose a hazard to workers and inspection staff.	
Testing Protocols	
Assessment of presence and degree of infestation and risk to worker.	
Client Education	

- A Notice of Potential Hazard may be issued.
- Inform client in writing of observed condition and associated risks.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

Training

- OSHA training may be utilized.
- How to assess presence and degree of infestation, associated risks, and deferral policy.

7.18 – Radon

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Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

What guidance do you provide Subgrantees around radon?

- Radon mitigation, as defined in the Michigan Weatherization Field Guide, is not an allowable H&S cost.
- Clients must sign an informed consent form prior to receiving weatherization services. This form must be kept in the client file.
- In homes where radon may be present, work scope should include precautionary measures based on EPA Healthy Indoor Environment Protocols for Home Energy Upgrades, to reduce the possibility of making radon issues worse.
- Whenever site conditions permit, cover exposed dirt floors within the pressure/thermal boundary with 6 mil (or greater) polyethylene sheeting, lapped at least 12" and sealed with appropriate sealant at all seams, walls and penetrations.
- Other precautions may include, but are not limited to, sealing any observed floor and/or foundation penetrations, including open sump pits, isolating the basement from the conditioned space, and ensuring crawl space venting is installed.

Testing Protocols

No testing for Radon will be done.

Client Education

- Informed consent form must be signed by all clients and include:
 - Information from the results of the IAQ Study that there is a small risk of increasing radon levels when building tightness is improved;
 - A list of precautionary measures WAP will install based on EPA Healthy Indoor Environment Protocols;
 - Some of the benefits of Weatherization including energy savings, energy cost savings, improved home comfort, and increased safety; and
 - Confirmation that EPA's A Citizen's Guide to Radon was received and radon related risks discussed with the client – this guide must be provided to all WAP clients.

Training and Certification Requirements

<ul style="list-style-type: none"> • Auditors, assessors and inspectors training on radon includes, what it is and how it occurs, including what factors may make radon worse, and precautionary measures that may be helpful. • Workers must be trained in proper vapor retarder installation. • A zonal map can be located at https://www.epa.gov/sites/production/files/2014-08/documents/michigan.pdf • EPA’s “A Citizen’s Guide to Radon” can be accessed at https://www.epa.gov/sites/production/files/2016-02/documents/2012_a_citizens_guide_to_radon.pdf
Documentation Requirements
Signed acknowledgement form from client

7.19 – Safety Devices: Smoke and Carbon Monoxide Alarms, Fire Extinguishers					Back to First
Concurrence, Alternative, or Deferral					
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>		Results in Deferral <input type="checkbox"/>		
Funding					
DOE <input checked="" type="checkbox"/>	LIHEAP <input type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>	
What is your policy for installation or replacement of the following:					
<p>Smoke Alarms: Smoke detectors are required as a health and safety measure. When battery powered smoke detectors are installed they shall be installed in accordance with the manufacturer's recommendations, following state and local code requirements. New batteries may be installed in existing working smoke detectors. (Alkaline are recommended)</p> <p>When installing hardwired smoke alarms, it will be listed and labeled in accordance with UL 217 and installed in accordance with the IRC or as required by the authority having jurisdiction.</p> <p>https://sws.nrel.gov/spec/203011</p> <ul style="list-style-type: none"> • Smoke alarms may be installed where alarms are not present or are inoperable. • New installation of hard-wired devices (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 shall be concealed. 					

Carbon Monoxide Alarms:

Carbon Monoxide (CO) alarms shall be installed in each dwelling unit, regardless of heating type in compliance with NFPA 720 and ASHRAE 62.2. 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 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.
- CO alarms must be installed where alarms are not present or are inoperable.
- New installation of hard-wired devices (carbon monoxide sensors) 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 shall be concealed.
- When a fuel combustion appliance is present in the dwelling with a garage is attached a carbon monoxide alarm/detector shall be installed in compliance with NFPA 720

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

For further testing requirements refer to CSPM 614 and the Michigan Weatherization Field Guide.

Fire Extinguishers:

Where solid fuel burning equipment is present, fire extinguishers may be provided as an allowable H&S measure.

Testing Protocols

- 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.
- Check existing alarms for operation.
- Verify operation of installed alarms.

Client Education

- A Notice of Potential Hazard or Air Quality Standards is issued detailing remedial action the client should take.
- Carbon monoxide alarms: Client education on appropriate test procedures, maintenance, and the proper action to take when alarm is activated.
- Smoke Alarms: Client education on appropriate test procedures, intervals to replace the batteries shall be documented, and the proper action to take when alarm is activated.
- Provide client with verbal and written information on use of devices installed.

Training

- Where to install alarms.
- Local code compliance.

7.20 – Occupant Health and Safety Concerns and Conditions

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Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

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.

What guidance do you provide Subgrantees for soliciting the occupants’ health and safety concerns related to components of their homes?

Screen occupants to reveal known or suspected health concerns either as part of initial application for weatherization, during the audit, or both. Only one screening is necessary. This screening is the opportunity for clients to self-report health concerns so that the agency can take these into consideration in order to safely address the client’s specific Health & Safety concerns.

Screening the client simply means letting them know that the work may cause dust, and asking them if they or anyone in the house has conditions that might be irritated by the work. Then working with them to make sure weatherization does not make it worse.

Due to the COVID-19 pandemic, all subgrantees have created field protocols, which include their protocols for screening clients and workers, and expectations around field practices for safety, including PPE and social distancing.

What guidance do you provide Subgrantees for determining whether occupants suffer from health conditions that may be negatively affected by the act of weatherizing their home?

Screen occupants to reveal known or suspected health concerns either as part of initial application for weatherization, during the audit, or both. Only one screening is necessary.

Screening the client simply means letting them know that the work may cause dust, and asking them if they or anyone in the house has conditions that might be irritated by the work. Then working with them to make sure weatherization does not make it worse.

What guidance do you provide Subgrantees for dealing with potential health concerns when they are identified?

- When a person’s health may be at risk and/or WAP work activities could constitute an H&S hazard, the occupant will be required to take appropriate action based on severity of risk.
- Failure or the inability to take appropriate actions must result in deferral.
- A Notice of Potential Hazard may be issued detailing specific remedy to observed H&S subject.

Client Education

- Inform client in writing of any known risks.
- Provide client with a point of contact information in writing so client can be informed of any issues.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence. A Notice of Potential Hazard may be issued detailing specific remedy to observed H&S subject.

Documentation Form(s) have been developed and comply with guidance? Yes No

CSPM 614 Attachment Hazard Identification and Notification Form
552 Documentation signed by client.

7.21 – Ventilation and Indoor Air Quality					Back to First
Concurrence, Alternative, or Deferral					
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>			
Funding					
DOE <input checked="" type="checkbox"/>	LIHEAP <input type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>	
DOE funds are being used.					
Implementation of ASHRAE 62.2 version 2016 is required. Client refusal of mechanical ventilation, when evaluated and called for pursuant to the Standard, must result in deferral.					
Identify the Most Recent Version of ASHRAE 62.2 Implemented (optional: identify Addenda used)					

All dwellings weatherized shall be evaluated for implementation of program required ASHRAE 62.2 ventilation standard requirements. Compliance requirements (e.g. testing, calculations, fan sizing, fan Sone rating, Whole-home fan flow verification, continuous vs. intermittent fan specifications, file documentation, etc.) shall be performed by the auditor and then verified by the QCI at the final inspection. SOM IWC venting calculations shall be used to determine mechanical sizing requirements. When calculations indicate 15 CFM or less, goals will be considered met and additional mechanical ventilation shall not be added. Method of compliance shall be documented on the 62.2 tab in FACSPRO.

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

- Mold
- Presence of moisture
- 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 in the CSPM in FACSPRO or on the www.michigan.gov/bcaeo.

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 later in the Health and Safety Plan, 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.
- 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.

Testing and Final Verification Protocols

<ul style="list-style-type: none"> • Implementation of program required ASHRAE 62.2 ventilation standard evaluation to determine required ventilation. • Measure fan flow of existing fans and of installed equipment to verify performance. • If the ASHRAE normative Appendix A is employed and an existing fan is being replaced or upgraded to meet to whole-house ventilation requirements, take actions to prevent zonal pressure differences greater than 3 Pascals across the closed door, if one exists. • When the mechanical ventilation standards cannot be met, alternative ventilation sources will be implemented. • The unit will be deferred when SHPO or construction barriers prohibit ventilation installation.
Client Education
<ul style="list-style-type: none"> • Energy Auditors and QC Inspectors will discuss ventilation requirements and usage during on-site visits. • Provide client with information on function, use, and maintenance (including location of service switch and cleaning instructions) of ventilation system and components. • Provide client with equipment manuals for installed equipment. • Include disclaimer that ASHRAE 62.2 does not account for high polluting sources or guarantee indoor air quality. • Client education includes location of service switch and cleaning instructions.
Training
<ul style="list-style-type: none"> • Training to implement ASHRAE 62.2 ventilation standards, including proper sizing, evaluation of existing and new systems. • IAQ Training

7.22 – Window and Door Replacement, Window Guards					Back to First
Concurrence, Alternative, or Deferral					
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>			
Funding					
DOE <input checked="" type="checkbox"/>	LIHEAP <input type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>	
Replacement, repair, or installation is not an allowable H&S cost.					
What guidance do you provide to Subgrantees regarding window and door replacement and window guards?					
<p>Window or door repairs are allowable as a H&S measure, if:</p> <ul style="list-style-type: none"> • It resolves a bulk water intrusion issue that is the cause of visible biological growth, and; <p>The H&S Window or Door repair is well documented with written explanation and photos of the biological growth in the client file.</p> <p>Window or door replacements are not allowable as a H&S measure.</p>					
Testing Protocols					
Not applicable					
Client Education					

<ul style="list-style-type: none"> • Provide written information on lead risks wherever issues are identified. • Energy Auditors and QC Inspectors will discuss window safety glass/guards requirements and usage during on-site visits.
Training
<ul style="list-style-type: none"> • Training is conducted during QC Inspector/Energy Auditor classes. • OSHA instruction may be provided. • Awareness of guidance.

7.23 – Worker Safety (OSHA, etc.)		Back to First
Concurrence, Alternative, or Deferral		
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>
Funding		
DOE <input checked="" type="checkbox"/>	LIHEAP <input type="checkbox"/>	State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input type="checkbox"/>
DOE Support funds can be used to cover these training costs. Training costs are a support cost and will be covered within T/TA budget.		
How do you verify safe work practices? What is your policy for in-progress monitoring?		
<ul style="list-style-type: none"> • Workers must follow OSHA standards where required and take precautions to ensure the H&S of themselves and other workers. • All agency staff and contractors must maintain compliance with the current OSHA Hazard Communication Standard, including on-site organized Safety Data Sheets (SDS) (formerly called MSDS). • Monitoring <ul style="list-style-type: none"> ○ The BCAEO Weatherization Monitors verify that agency, crews and contractors follow safe work practices. 		
Training and Certification Requirements		
<ul style="list-style-type: none"> • Use and importance of PPE. • Safety training appropriate for job requirements. OSHA 10 hour training meets this requirement. • Ongoing training as required in Hazard Communication Program. 		

7.24 – Clothes Dryer Venting (Un-vented clothes dryers shall be vented outside)		Back to First
Concurrence, Alternative, or Deferral		
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>
Funding		
DOE <input checked="" type="checkbox"/>	LIHEAP <input type="checkbox"/>	State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input type="checkbox"/>
Remediation Protocols		
Weatherization work measures (except mechanical work orders to resolve the above) shall not be installed		

until unsafe appliances have been repaired, replaced, or removed.

Clothes dryers shall be vented directly to the exterior. Clothes dryers shall be vented using aluminum or galvanized sheet metal or approved aluminum flex duct (UL labeled) and in accordance with SOM Construction Code. Outdoor dryer vent caps shall have a backdraft damper that closes when the dryer is not being used.

Testing Protocols

<https://sws.nrel.gov/spec/660051>
<https://sws.nrel.gov/spec/660053>

Client Education

Client Education will include proper maintenance of the dryer vent and lint tray.

Training

Training on how to properly vent a clothes dryer.

Attachment to 618 – Sample Training and Technical Assistance Retention Agreement

THIS TRAINING AND TECHNICAL ASSISTANCE RETENTION AGREEMENT made this ____ day of _____, 20__, is by and between AGENCY NAME (hereinafter “CAA”), 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 “WAP”).

WITNESS:

WHEREAS, 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 CAA and Contractor as hereinafter provided, the parties hereby mutually agree as follows:

1. CAA 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 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 CAA the total T&TA funds drawn within thirty (30) calendar days of notice from CAA. Said reimbursement amount shall become immediately due and payable as a debt and obligation of Contractor to CAA. Repayment will be made in the full amount due as a lump sum. **If payment is not received by CAA within thirty (30) days, CAA may assess reasonable costs of collection, including but not limited to interest, court costs, and attorney’s fees.**
5. If Contractor enrolls in a training course through the State of Michigan and cancels their participation with less than two (2) business days’ notice or does not attend the training, the contractor will be charged any fees associated with that cancellation.

Attachment to 618 – Inspector Field Observation Test House Criteria

If a grantee agency needs to locate a home to accommodate a QC auditor/inspector candidate performing the field test, the following is the field test house criteria:

The stick-build residential home (pre-1978 construction) should include the following:

- Forced air furnace
- Ducted distribution system
- Gas DHW
- At least one natural drafting appliance
- At least one exhaust fan (bathroom)
- Gas line (natural gas or propane)
- Gas range
- Accessible attic with at least some form of attic ventilation (gable, soffit, ridge, etc.)
- Work scope/order for the home/inspection the exam will be conducted on
- Initial audit with diagnostic results for the home/inspection the exam will be conducted on
- Must have someone available to conduct a short interview with
- Site must have had work completed from a comprehensive work scope

Attachment to 618 – Release of Test Information

I understand _____(Sponsoring Agency) is sponsoring me to attend a Michigan Department of Human Services, Bureau of Community Action and Economic Opportunity (DHHS BCAEO) training.

I agree by signing below that the DHHS BCAEO staff is hereby authorized to release information regarding my attendance and test scores to the agency listed above.

Signed: _____ Date: _____

DHHS BCAEO Witness: _____ Date: _____

Sponsoring Agency Contact Person: _____

Contact Person's Email Address: _____

Attachment to 619 – 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.

Lighting and Appliances

- 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.