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

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 at any time during the 12-month period preceding the application date:

- Received Cash assistance payments under Title IV (FIP);
- Received cash assistance payments under Title XVI of the Social Security Act (SSI),
- Received assistance under the Low-Income Home Energy Assistance Act of 1981 (LIHEAP) (Energy Related SER); or
- Met the income requirements of any **HUD means-tested programs at or below 80%AMI** (examples of HUD programs include but are not limited to Community Development Block Grants (CDBG), HOME Investment Partnerships Program (HOME), Lead Hazard Control & Healthy Homes Program (OLHCHH))

NOTE: The receipt of any automatic income eligibility benefit or proof of eligibility for the benefit in the previous twelve months must be documented in the case file. The State's quarterly SSI payments do not need to be documented but must be included in the calculation.

Income Determinations Using Automatic Eligibility

Some LWOs operate programs that grant automatic WAP eligibility, as listed above. In those cases, the LWO may in effect determine WAP clients as automatically eligible for the program at a different income threshold than traditional eligibility. Some of the income thresholds for the programs, e.g. 80% AMI, may be higher than the traditional 200% FPL. For that reason, in these automatic eligibility instances, MDHHS requires the following assurances to be in place:

- Clients on the waitlist that were determined by traditional eligibility must be prioritized over automatic eligibility clients that have a higher income than traditional eligibility.
- Clients on the waitlist that were determined eligible by automatic eligibility with a High Energy Burden (see CSPM 611) must be served before clients determined eligible by automatic eligibility without a High Energy Burden.

In order to make these assurances, the LWO must include the income documentation that was used to determine the client's eligibility for the alternate program in the client file.

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.

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

  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).
   - 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
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.
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

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.

602 – PROGRAMMATIC REPORTING

REFERENCES

- Weatherization Assistance Program (WAP) Program Agreement
- Weatherization Program Notice 21-1

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.

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.

- 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.

  *Due to supply chain disruptions, some Grantees have experienced extensive delays in refrigerator deliveries to clients. In cases where the refrigerator delivery will delay the scheduling of the Quality Control Inspection, Grantees may opt to cover the cost of the refrigerator out of an alternative funding source (e.g. LIHEAP), and proceed with the final inspection before the refrigerator is installed. In this case, the Grantee must confirm receipt and installation of the refrigerator and maintain photo documentation of the installation in the client file.

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

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.

The use of DOE funds on a unit may include, but is not limited to, indirect expenditures (e.g., administrative, T&TA, amortized equipment) and direct costs such as energy auditing, measure installation, H&S, and inspections. A dwelling unit that meets both the definition of a DOE weatherized unit and uses DOE funds for direct costs must be reported as a DOE completed unit.

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 WDZ files must be uploaded into the agency's SharePoint folder under:
_Weatherization Assistance Program →
_Libraries →
PY folder

Window Replacement Reporting

Beginning in PY21, DOE was directed by congress that the occurrence of window replacements supporting the reduction of lead-based paint hazards, must be tracked and reported in the WAP. DOE has not yet released the format of the reports to state offices. Beginning in PY21, agencies are required to track these types of window replacements and report them to BCAEO. If the tracking tool is not complete in the statewide database at the beginning of PY21, agencies must track with their own records until a different mechanism is in place.

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.

- 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

- 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 exceed 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.

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 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 Grantees must follow MIOSHA standards for COVID safe work.

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). It is a best practice for the QCI to sign off indicating that measures have been installed to Michigan Field Guide/Standard Work Specifications standards before payment is made to the contractor that installed those measures. If a Grantee opts to pay a contractor before the QCI has signed off on the measures, the Grantee may assume financial responsibility to update the installation if it is found to be out of compliance. 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.

605 – REWEATHERIZATION OF DWELLING UNITS

REFERENCES

10 CFR Part 440, Weatherization Assistance Program for Low-Income Persons
WAP Memorandum 075
Energy Act of 2020

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.

Section 1011(h) of the Energy Act of 2020, also amended 42 U.S. Code § 6865(c)(2) and removed the reweatherization date and alternatively created a “rolling” option:

> Dwelling units weatherized (including dwelling units partially weatherized) under this part, or under other Federal programs (in this paragraph referred to as ‘previous weatherization’), may not receive further financial assistance for weatherization under this part until the date that is 15 years after the date such previous weatherization was completed. This paragraph does not preclude dwelling units that have received previous weatherization from receiving assistance and services (including the provision of information and education to assist with energy management and evaluation of the effectiveness of installed weatherization materials) other than weatherization under this part or under other Federal programs, or from receiving non-Federal assistance for weatherization.

Please note, the inclusion of “other Federal programs” includes all Federal funds including LIHEAP, HUD, or USDA “weatherization” activities.

POLICY

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

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

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

Reweatherized 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.

Although reweatherization is allowable as guided above, the priority is to serve dwelling units that have not been previously weatherized.

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 21-1, 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.

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);
   - Assistance under the Low-Income Home Energy Assistance Act of 1981 (SER)

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.

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.
- 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.

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

During PY20, BCAEO received approval from DOE for usage of single family and manufactured home energy audit tools. As part of that submission, DOE approved an Energy Auditor manual, which now must be followed for compliance in the State of Michigan Weatherization Assistance Program. Please see that manual at this link:

Approved audits for the State of Michigan include:

National Energy Audit Tool (NEAT)

- Approved by DOE 5/7/2021
- Expires 9/8/2026
- Required for the determination of weatherization measures to be installed for one to four unit dwellings.

Manufactured Housing (MHEA)

- Approved by DOE 5/7/2021
- Expires 9/8/2026
- 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 have been developing a cloud-based version of Weatherization Assistant (known as WA 10 or WA "in the cloud"). Per WAP Memo 074 and 074A, that software is still being tested and the timeframe of moving to the new software is not spelled out. As part of the rollout of WA 10, BCAEO and MiTEC will deliver trainings to the network before the system is required to be utilized. BCAEO will inform the network when the required timeframes of trainings have been spelled out and also 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 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**
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 **ON**
37. Replace AC **ON**
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**
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**
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 **ON**
42. Replace dx cooling equipment **ON**
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, 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,

- 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 WA 8.9 (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.

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

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 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."

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).

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

  - 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.

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:**

- **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.

- **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.

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 May 26, 2021. The Field Guide is valid until September 8, 2026. 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 will be identified in this document and will be anticipated updates for the next published version of the Michigan Weatherization Field Guide.

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). 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

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.

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.

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, 21-1
- 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.

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.

Grantees may complete up to 20% of their annual agency production as multifamily units. If a Grantee seeks to exceed 20% of their annual production from multifamily units, they must request a waiver by emailing MDHHS-BCAEO@michigan.gov with the request and justification. The agency may not proceed on multifamily projects exceeding 20% of their annual production before the waiver is approved.

Multifamily Building Eligibility

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

(i) Are eligible dwelling units, or

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

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

of the upgrades to equipment, energy systems, common space, or the building shell. Utilizing the 50% rule requires BCAEO approval and DOE approval.

All units in the building MUST be similarly served and all units separately reported to DOE.

All units, whether having income eligible occupants or not, must be weatherized, along with common areas, and tenants (eligible or not, having applied or not) cannot opt out of audit determined energy savings measures.

Vacant Units

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

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 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**
   - 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.

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

[1]If tenants are not billed directly for energy costs. Grantee documents how benefits accrue to residents.

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

facilities or services that offer measureable direct benefits to tenants	description	
Investment of the energy savings from the weatherization work in specific health and safety improvements with measureable benefits to tenants	Maybe- requires description	Yes
Additional improvements, not related to weatherization, to heat and hot water distribution, and ventilation, to improve the comfort of residents	Yes	Yes
Establishment of shared savings program	Maybe- requires description	Yes

Audit Runs

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.

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 <u>package of measures</u>, 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 <u>would</u> 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 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.

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.

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 <u>and</u> 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

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

- 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.

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

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.

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:

Except in cases where the landlord also qualifies for weatherization services, BCAEO requires financial participation of a landlord for weatherization of a multifamily property unless express case by case waiver for contribution is granted. When weatherizing rental properties containing two to four units, Grantees may choose to require landlord contributions, except in cases where the landlord also qualifies for weatherization services.

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. Sample landlord policy documents are attached to this CSPM. The Grantee’s

governing board is required to approve the landlord contribution policy if the Grantee is a Community Action Agency. A Grantee cannot require a landlord contribution for DOE single family rental homes, but a Grantee can encourage landlords that are able to contribute to do so as part of the weatherization work being completed.

The Grantee's Landlord Agreement must incorporate language identifying the contribution option(s); the option(s) chosen by the Landlord; specifically, how the contribution will be used; any established landlord contribution unit cap; waiver criteria and if the contribution is waived, why it is waived.
The Grantee is required to maintain documentation that supports the disposition of landlord contributions as agreed upon between the Grantee and the landlord.

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

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

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

609 – DEFERRAL POLICY

REFERENCES

DOE Weatherization Program Notice 22-1 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 with a final close out date within the last 15 years.
- 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.

- 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 an unsafe condition exists and 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.

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.

- 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.

- 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. In these circumstances, the Grantee must provide the client the agency's defined appeals process to follow.

Deferral Notification Requirements

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

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

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

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

Deferral Tracking Requirements

All deferrals that occur after a Weatherization application is created in FACSPro and the reason for the deferral must be documented in the FACSPro WxPro Module under the notes section of the deferral queue.

If a deferral is identified before the Weatherization application is created in FACSPro, and the Grantee does not have the resources to address it, they must track it in the BCAEO Deferral Tracking Tool. Advocates within the State of Michigan and DOE are interested in understanding more about Weatherization deferrals and frequently request data on them. At any time, BCAEO may request submission of the up to date Tracking Tool.

Weatherization Readiness Funds

Beginning in PY22, DOE has added a cost category for Weatherization Readiness Funds (WRF). WRF are designated for use by Grantees in addressing structural and health and safety issues of homes that are currently in the queue to be weatherized, but at risk of deferral. This funding is specifically targeted to reduce the frequency of deferred homes that require other services, outside the scope of weatherization, before the weatherization services can commence.

Units receiving WRF must:

- Be closed during the same DOE grant project period. This is typically a 3-5 year grant period. BCAEO will notify agencies in years that end the grant and that WRF projects will need to be closed that same year.
- Count as EITHER a DOE Formula unit or a DOE BIL unit.

- Result in a DOE completion defined as, "A dwelling on which a DOE-approved energy audit or priority list has been applied and weatherization work has been completed."
- Maintain a maximum allowable Average Cost Per Unit of 150% the program operations ACPU. For PY22 that is $12,014.

WRF Reporting

Grantees are required to track the information below and will be asked to prepare a summary of units receiving WRF for the PY 2022 T&TA, Monitoring and Leveraging Report.

- Avoided deferrals – the number of dwelling units made weatherization ready with these funds, and for each building or unit:
- Year Built;
- Housing Type (site-built single family, manufactured housing, multifamily);
- Nature of repairs needed which prohibit weatherization. Where applicable, identify multiple repairs or remediation reasons for a single building. The following repairs are allowable:
    - Mold remediation
    - Moisture control
    - Knob and tube wiring issues
    - Other electrical issues
    - Grading
    - Roof repair and replacement
    - Structural issues
    - Measures to meet SHPO requirements
    - Gutters and downspouts
    - Drainage system
    - Sump pump installation
    - Minor plumbing repair and replacement
    - Pest control
    - ASHRAE related ventilation issues
    - Asbestos encapsulation and remediation
    - Radon testing and mitigation.
    - Other – Grantees may encounter reasons for deferral not included on the prior list. In these instances, the agency must submit a waiver to BCAEO describing the needed measure and other relevant details. Waivers must

be submitted to MDHHS-BCAEO@michigan.gov, and the agency must receive pre-approval before work commences.

- DOE WRF expenditure per unit and building; and,
- Leveraged fund expenditure per unit and building (i.e., funds such as LIHEAP, HUD, non-federal, etc. braided with DOE WRF to make building weatherization ready).

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

- 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.

611 – CLIENT PRIORITY SELECTION CRITERIA

REFERENCES

- Department of Energy, 10 CFR Part 440.16
- Weatherization Program Notice 21-1
- 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)
  - This priority point is automatically calculated based on the resident age in customer intake.
- Disabled Units
  - This priority point must be manually entered in the characteristics table of customer intake.
- Households with children (defined as an individual below the age of 19)
  - This priority point is automatically calculated based on the resident age in customer intake
- 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 Projection	Measure	10% above Midpoint
Natural Gas	81	Mcf	89
Heating Oil	520	Gallons	572
Propane	635	Gallons	698

  - This priority point must be manually entered in the characteristics tab of customer intake.

- Households with a High Energy Burden (HEB)- defined as follows: any household that pays more than 15% of its total annual household income toward annual energy costs.
  - **Households with a HEB must be assigned two priority points**
  - This priority point must be manually entered in the characteristics tab of customer intake

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.

Clients meeting one or more points will be considered Priority Applicants. Applicants with no priority points will remain at the end of the waiting list and will be served, oldest eligibility date first, after all “Priority Applicants” with one (1) or more points are served. All applications are required to re-verify the household income for the program annually. No applications on the waiting list should be older than one year. 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.

Although reweatherization is allowable as spelled out in CSPM 605, the priority is to serve dwelling units that have not been previously weatherized.

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 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, written 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.
  - In PY21, data collected from PY20 will be evaluated from the collection of utility data and the process will be updated and policy updated.
- 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

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
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?
    - 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:
  - 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.

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
- Photographs that show anything out of the ordinary (e.g. large bypasses in attic, crawlspace clutter, etc.)
- Photographs of all measures and work areas not accessible at time of WCI or monitoring
- Photographic justification of all IRMs (also requires written justification)
- Photographs for relevant H&S items
    - Photographs of site containment set up for LSW (see H&S Plan for details)
    - H&S roof repair is well documented with written explanation and photos of the biological growth in the client file.
    - H&S Window or Door repair is well documented with written explanation and photos of the biological growth in the client file.

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.

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

<u>Intake</u>

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

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

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

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

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

4. Notify the applicant of the eligibility determination.

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

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

<u>Audit</u>

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

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

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

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

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

3. Complete the audit.

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

    a. Explain the nature of the work that may be done on the home.
    b. If the client is actively participating, agree on three energy action steps for the client to do.

c. If the client is actively participating, the Client Plan of Action should be signed by the client and auditor. A copy is to be provided to the client and the original must be uploaded to the FACSPro Weatherization Module under the Weatherization Application Documents tab.

Weatherization Work

When the crew or contractor is at the client's home, he/she should take advantage of every opportunity to reinforce the client's Energy Action Plan (E.A.P.). The theme of partnership and the goal statement need to be a part of the crew or contractor's interaction with the client for continued success.

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

1. Introduce the contractor or crew to the client.

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

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

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

5. Explain the next step- inspection.

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.

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.

613 – MAXIMUM AVERAGE COST PER UNIT

REFERENCES

- U.S. Department of Energy (DOE) –Weatherization Program Notice 21-1
- WAP Agreement

PURPOSE

To identify the allowable maximum average cost per unit (ACPU).

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.

POLICY

Grantees are expected to maintain an average cost per unit at or below $8,009. 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 $8,009.

*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 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.

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

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

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

- 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.

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

- 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.

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. The POI policy cannot exclude lead if DOE funds are used to purchase it. LWOs are strongly advised to either refer or defer weatherization work that will disturb surfaces that may contain lead-based paint, until they have insurance that provides coverage for Lead Safe Weatherization (LSW) work situations involving lead-based paint.

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

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

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

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

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.

618 – WEATHERIZATION ASSISTANCE PROGRAM TRAINING & CERTIFICATION REQUIREMENTS

REFERENCES

- State of Michigan Department Of Energy State Plan
- Department of Energy Weatherization Program Notices 22-1, 22-4
- 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 (WPN) 22-4.

POLICY

Definitions

Job Task Analyses (JTAs)

JTAs define and catalogue the knowledge, skills, and abilities a practitioner needs to perform a given job effectively and safely. JTAs are used by training providers to develop coursework that can be verified and accredited by a third-party organization. There are four JTAs in the WAP, each have different requirements for training and certifications:

- **Retrofit Installer/Technician (RIT):** A residential energy efficiency professional who installs energy efficiency upgrades in dwelling units.
- **Crew Leader (CL):** A Crew Leader is responsible for supervising and assisting in the retrofitting activities specified in the scope of work. The Crew Leader is responsible for quality control, interacting with the client, managing personnel and materials, and ensuring a safe and efficient job site.

- **Energy Auditor (EA):** An experienced professional who evaluates the health and safety issues, durability, comfort, and energy use of a residential building. The Energy Auditor (EA) conducts advanced diagnostic tests, gathers and analyzes data, and creates energy models to draw conclusions and make recommendations to the client for improvements.
- **Quality Control Inspector (QCI):** A certified residential energy-efficiency expert who ensures the completion, appropriateness, and quality of energy upgrade work by conducting a methodical inspection of the building and performing safety and diagnostic tests. The QCI has no involvement in the prior work on the home either as the auditor or as a member of the crew.

Comprehensive Training
Occupation-specific training which is part of an overall curriculum aligned with the topics within the given JTA being trained. Comprehensive training must be administered by, or in cooperation with, a training program that is accredited by a DOE-accepted credentialing body for the JTA being taught.

Comprehensive training must be administered on a regular basis. BCAEO ensures this frequency by detailing the requirement for “renewal” Comprehensive training under each JTA.

Specific Training
Single-issue, short-term training to address technical skills or knowledge gaps. Conference trainings and any training not aligned with a Home Energy Professional JTA are included in this category.

Performance Based Modules Framework
Performance Based Modules (PBMs) have been created to provide additional flexibility to meet training requirements and demonstrate worker experience/skills. As an alternative to the Comprehensive training requirement outlined below for those working in the RIT/CL JTA, individuals may successfully demonstrate these targeted specific work outputs on the job (as specified below by JTA).

In order to complete the Comprehensive training requirement through the PBMs, candidates must successfully demonstrate competency of all relevant PBMs within 1 year from the rollout of this framework (October 25, 2021) or their start date in the WAP, whichever is later. A Certified Mentor must review the work output to ensure the candidate has met all targets of the PBM before certifying that they have demonstrated

the competency. If an individual does not successfully complete all relevant PBMs within 1 year, they must meet the Comprehensive training requirement by participating in training.

A formal PBM certification will be issued after all relevant PBMs have been signed off by a Certified Mentor or Mentors for the candidate. Once the PBM certification is issued, the candidate has met the Comprehensive training requirement (as specified by the JTA requirements below). The candidate must maintain this Comprehensive training requirement by attending the RIT renewal course at the Michigan Weatherization Conference, at minimum, every two years.

The PBM Passport for Michigan is included as Attachment A to this CSPM.
Once a Certified Mentor has signed off that a candidate has achieved a PBM the agency must submit documentation of completion to BCAEO. Agencies are encouraged to update completed PBMs in real time; but are required to provide an update of completed modules by the 14th of the month following the reporting month when the modules were completed. To report completion, the agency must email MDHHS-MiTec@michigan.gov and report the individual's name, completed modules, certified mentor (for each component), and date of completion (for each component).

Because many contractors work with multiple agencies, BCAEO encourages managers to work together to track an individual's progress toward PBM completion in order to avoid duplicate work. BCAEO also encourages managers to regularly review the completed PBMs for individuals.

Individuals may achieve partial success of the PBM before having displayed the entire skill. It could be of benefit for Weatherization managers to maintain this information in more detail for their own management purposes. BCAEO encourages managers to work with the Certified Mentors to understand the skills of individuals working in the relevant JTAs, especially if they attempt and fail to pass a competency. Only passed competencies must be reported to BCAEO.

Although agencies will not report detailed PBM Passport information to BCAEO, they are expected to keep this support documentation (e.g. completed passport, signatures of Certified Mentors) on file. BCAEO may request more details on the PBM tracking process at an agency during monitoring.

To become a Certified Mentor, individuals must be a certified Energy Auditor, Quality Control Inspector or MiTEC Instructor. Certified Mentors must also have completed the

online orientation for Certified Mentors. Individuals may not participate as a Certified Mentor if they have received a violation under CSPM 618.1 within the past year. BCAEO will maintain a roster of Certified Mentors in SharePoint that will be available to the network to view. If a PBM requires an additional onsite visit for a Certified Mentor than would be typical in a job, that cost may be covered with T&TA funds.

Exceptions to particular PBMs will be granted by BCAEO on a case by case basis as appropriate for each individual. One example for a reason to skip a PBM is an individual that works for a company who does not work on mobile homes waiving mobile home related PBMs. Exceptions may be requested by emailing MDHHS-BCAEO@michigan.gov with a justification as to why that module should be skipped for the individual and copying the BCAEO Weatherization Specialist.

Comprehensive Training Requirements by JTA

RIT

- **Initial**
  - Any IREC approved RIT/CL JTA comprehensive training from list below within 1 year of individual's start date; **OR**
  - Performance Based Modules completed within 1 year of PBM rollout **OR** individual's start date, whichever is later
- **Renewal**
  - For comprehensive training: Any IREC approved RIT/CL JTA comprehensive training from list below within 3 years of previous comprehensive training
  - For PBMs: Attend the RIT renewal course at the Michigan Weatherization Conference, at minimum, every 2 years beginning at the conference after the PBMs are completely achieved

CL

- **Initial**
  - Crew Leader training (MiTEC course) within 180 days of an individual's start date **AND**
  - Any IREC approved RIT/CL JTA comprehensive training from list below within 1 year of individual's start date **OR**
  - Performance Based Modules completed within 1 year of PBM rollout **OR** individual's start date

- **Renewal**
  - For comprehensive training: Any IREC approved RIT/CL JTA comprehensive training from list below or retake of Crew Leader training within 3 years of previous comprehensive training
  - For PBMs: Attend the RIT renewal course at the Michigan Weatherization Conference, at minimum, every two years

IREC Approved RIT/CL JTA MiTEC* Courses
Weatherization 101
Advanced Air Sealing
Dense Pack Insulation
Foundation Insulation
Mobile Home Weatherization
*Comprehensive Trainings offered outside of MiTEC will be reviewed on a case by case basis. Please email requests for review to MDHHS-BCAEO@michigan.gov

EA:

- **Initial**
  - Energy Auditor training (MiTEC course) before achieving certification or within 180 days after beginning work in WAP if already a holder of the BPI EA certification
- **Renewal**
  - Any IREC approved EA/QCI JTA comprehensive training from list below within 3 years of achieving certification

QCI:

- **Initial**
  - QCI training (MiTEC course) before achieving certification or within 180 days after beginning work in WAP if already a holder of the BPI QCI certification
- **Renewal**
  - Any IREC approved EA/QCI JTA comprehensive training from list below or retake of QCI training within 3 years of achieving certification

IREC Approved EA/QCI JTA MiTEC* Courses
Energy Auditor
Mechanical Systems for Auditors

NEAT/MHEA Set Up and Maintenance
NEAT/MHEA Data Entry
CAZ Pressure Diagnostics
ASHRAE 62.2-2016
Venting & Combustion Air
Zone Pressure Diagnostics
*Comprehensive Trainings offered outside of MiTEC will be reviewed on a case by case basis. Please email requests for review to MDHHS-BCAEO@michigan.gov

Specific Training/Certification Requirements for Michigan Weatherization Workers

Lead Safe Work and Lead Renovator Repair Painting Training/Certification
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. Documentation relative to LSW/LRRP certification shall be maintained at the agency. In order for entities that potentially disturb lead to comply with EPA, there may be further LRRP firm requirements. Please see the EPA firm section under “Licenses and Insurance Requirements” in this guidance.

Health & Safety (formerly Indoor Air Quality) Training
Weatherization staff (as listed below) shall receive specialized training on health and safety concerns related to Michigan’s Weatherization Assistance Program. This training includes causes and solutions surrounding microbial growth, indoor air quality, building durability, combustion appliances and fuel leaks, electrical safety, safety devices and guards, hazardous material disposal, injury prevention and worker safety. 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 H&S

certification shall be maintained at the agency. Individuals who previously met the requirement for IAQ training meet the requirement for H&S training unless otherwise specified.

OSHA Training/Certification
Training shall be provided by Occupational Safety and Health Administration qualified instructor. The construction "10-hour Occupational Safety and Health training course" is required for Weatherization staff (as listed below) All individuals working in a JTA 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. 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).

Specific Training Requirements by JTA:
RIT

- LSW/LRRP training/certification must be completed within 180 days of start date
- H&S (formerly IAQ) training must be completed within 180 days of start date
- OSHA 10 training/certification must be completed within 180 days of start date

CL:

- LSW/LRRP training/certification must be completed within 180 days of start date
- H&S (formerly IAQ) training must be completed within 180 days of start date
- OSHA 10 training/certification must be completed within 180 days of start date

EA:

- LSW/LRRP training/certification must be completed within 180 days of start date
- H&S (formerly IAQ) training must be completed within 180 days of start date

- OSHA 10 training/certification must be completed within 180 days of start date

QCI:

- LSW/LRRP training/certification must be completed within 180 days of start date
- H&S (formerly IAQ) training must be completed within 180 days of start date
- OSHA 10 training/certification must be completed within 180 days of start date

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.

Contractor Stipends for Training

Contractors may be compensated for their time spent in required trainings. In an effort to reduce potential confusion and redundancy, BCAEO will make all training stipend payments to contractors. Grantees must ensure their contract language with contractors is updated to reflect those payments will not come directly through the Grantee. Grantees must also ensure that they have retention agreements in place with any contractor who intends to receive a training stipend. Further, they must ensure contractors understand the framework for training stipend payments, as spelled out below.

DOE and BCAEO endorsed training conferences are the one exception to the paragraph above. Grantees may optionally determine if they will offer training stipends (at the rates detailed below) for attending DOE and BCAEO approved training conferences. If they will offer stipends for these activities, the terms of those payments must be spelled out in their contracts, and they must be paid out of the Grantee's T&TA allocation.

Individuals to be compensated

Any contractor company working in the Michigan WAP may receive a training stipend through DOE T&TA funds from BCAEO for allowable trainings if their employee(s) work in one of the four JTAs (RIT, CL, EA or QCI). In order to receive a training stipend, the company must first have a retention agreement in place with at least one Michigan WAP Grantee and/or BCAEO.

Periods of compensation
Individuals will be paid stipends for approved training (listed below). Stipends will be either half day (up to 5 hours) or full day (5+ hours) of training.

Travel
Time spent traveling to and from training does not count for the approved activities time. In general, contractors are not eligible to receive reimbursement for mileage, lodging and meals. However, some training may require participants to travel a greater distance. In such instances, BCAEO will reimburse these expenses on a case-by-case basis. Lodging may be eligible for reimbursement up to GSA rates and mileage at the federal mileage rate. BCAEO encourages contractors to seek pre-approval for travel reimbursement for longer trips. Documentation will be requested as a component of these reviews.

Approved activities eligible for compensation
The following activities are eligible for in class time based training stipends:

- Required Specific trainings
- Comprehensive trainings in individual's JTA
    - Individuals may not receive stipend for attending the same training more frequently than every 3 years
- Required certification testing in individual's JTA
    - Individuals may not receive stipend for the same certification test more frequently than every 3 years

Activities must be attended in full for compensation to occur.

Pay rates by JTA
Individuals will be compensated at the following rates for approved activities listed above:

- Retrofit Installer: $175 full day/$80 half day
- Crew Leader: $215 full day/$100 half day
- EA/QCI: $231 full day/$108 half day

Payments
In order to receive payment, contractor companies must have completed a W-9 form with MPHI. Payments will be made to the contractor company, not to individual employees. For more information on completing the form, please contact MDHHS-BCAEO@michigan.gov.

Contractor companies must submit requests for reimbursement to MDHHS-BCAEO@michigan.gov. Requests must be submitted to BCAEO within 60 days of the activity or no later than July 30 for costs from the previous program year. BCAEO may reject any cost submission not deemed appropriate or allowable.

Submissions must include:

- Training/Activity attended
- Names of attendees from contractor company
- The JTAs of each attendee
- If applicable, travel reimbursements (see Travel section)
- Contact person phone number
- Contact person email address

Retention Agreement

In order to be eligible to receive a training stipend, a contractor company must have a signed retention agreement (or a retention component defined in contract language) with at least one Michigan WAP Grantee and/or BCAEO. They must also be under contract to perform work in the Michigan WAP. Agencies must submit retention agreements and contractor rosters to BCAEO upon request.

Training Cancelation Costs

Any contractor or staff that registers for a training course through MiTEC is obligated to attend that training. If a contractor or staff person needs to cancel his or her attendance at a training, they must cancel the registration by contacting MDHHS-MiTEC@michigan.gov 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 MiTEC, the Grantee will be charged a fee of $100.

Certification Requirements by JTA

RIT Requirements

Certification is not required to work in this JTA.

CL Requirements

Certification is not required to work in this JTA.

EA Requirements

In order to work in the EA JTA, an individual must hold either the State of Michigan (SOM) EA certification or the BPI EA certification. If an individual first opts to hold the SOM EA, that certification is valid for up to 18 months after

certification date. After that time, the individual must obtain the BPI EA certification in order to continue performing energy audits. See the prerequisites for each credential below.

Any Energy Auditor new to the Michigan Weatherization Assistance Program must submit their first three energy audits to their BCAEO Technical Monitor regardless of certification type. The Energy Auditor must submit the MDB file in SharePoint then send a notification email to MDHHS-BCAEO@michigan.gov and copy their Technical Monitor.

EA Prerequisites

SOM EA

Grantee Training

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

- Client Interview including:
  - Hazard Identification & Notification
  - Release of Liability & Waiver of Claims (DHHS 552-A)
  - Client Plan of Action
  - Lead Notice
  - Radon Informed Consent
- Recordkeeping:
  - IWC
  - SHPO
  - DOE approved audit
  - Work Order
  - Change Order process
  - Cost Center process
  - All appropriate notices
  - Client Assessment
  - Final Inspection Job Information
  - CSPM 612 Energy Audit requirements
- 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

- Work Order, Change Order and Cost Center process
- Requirements when to re-run the audit for SIR justification
- Staff separation of duties and responsibilities for all recordkeeping requirements
- Appropriate storage and usage of Grantee MDB file
- Appropriate access of Grantee computers and servers

Energy Auditor Comprehensive Training
All candidates for the SOM or BPI EA certification must take the Energy Auditor comprehensive training before obtaining certification.

BPI EA Initial

All prerequisites for SOM EA are required. Additionally, all items below are required prior to taking the multiple-choice and/or field certification exams:

Experience:

- Minimum of 1,000 hours of relevant experience, during which the candidate has accomplished one or more of the following roles within the last five (5) years:
- Field / technical position within the home performance or related field, **OR**
- Performing audits in a building science trade, **OR**
- Trainers or BPI Field Proctors may qualify under the experience requirement with proof of 1,000 hours of relevant training or field proctoring (or a combination of both)

Energy Modeling:

- In the past five (5) years:
- Candidate has completed and must submit ten (10) energy models that comply with the specifications identified in the current version of ANSI/BPI-1100-T, Section 2.2 for energy audit reports and also include an analysis of the savings to investment ratio or simple pay back of measure installations, OR
- Candidate has successfully completed training (minimum of 6 hours) in energy modeling that complies with the specifications identified in the current version of ANSI/BPI-1100-T, Section 2.2. The training must include an end of course assessment of which the candidate must provide proof of a passing score, OR

- Candidate is a designated trainer of energy modeling that complies with the specifications identified in the current version of ANSI/BPI-1100-T, Section 2.2, for an organization.
- *Providing on-the-job training does not fulfill this requirement*

Additional Requirements:
Candidate must obtain a **minimum of 20 points** from any combination of activities below within the last five (5) years:

- Building Trades Experience (framing, roofing, drywall, siding, weatherization, energy audits, QCI inspections, etc.); **maximum of 10 points**
  - **5 points** for each 1,000 hours
- Training from industry specific training center (training whose content aligns with the content of the job task analysis for the certification) (MiTEC Training Qualifies); **maximum of 10 points**
  - **5 points** for every 40 hours
- Related industry certifications [Residential Energy Services Network (RESNET), BPI, North American Technician Excellence (NATE), Environmental Protection Agency (EPA)]. Other certifications also considered through application; **maximum of 10** points
  - **5 points** per certification

BPI EA Renewal
To be eligible for certification renewal, BPI certified Energy Auditors:

- Must fill out and submit the Application for BPI Energy Auditor Certification RENEWAL and corresponding documentation to BPI, **AND**
- May either accumulate a minimum of twenty-four (24) qualifying* continuing education units (CEUs) over the three (3) years of certification in order to bypass the online exam, **OR**
- Successfully challenge the online exam that is current at the time of renewal.

Qualifying CEUs are defined as any educational trainings/sessions that align with the Functions and Tasks (knowledge, skills, and abilities) section in the Energy Auditor certification scheme handbook.

- In addition to either accumulating the minimum number of qualifying CEUs **OR** successfully completing the corresponding online exam, the Certified Professional must successfully challenge the field exam that is current at the time of renewal.

There is no allowance for bypassing the field exam in order to renew the Energy Auditor certification.

For more details on the BPI EA certification, please see the BPI EA Scheme Handbook or contact MiTEC at MDHHS-MiTEC@michigan.gov.

EA Certification Processes

SOM EA

The SOM EA certification consists of a field exam. In order to pass, the individual must achieve an 82% or higher **and** must pass all gated items. The SOM EA certification is valid for 18 months after successfully achieving the certification. After that time, the individual must obtain the BPI EA certification in order to continue performing energy audits.

BPI EA

The BPI EA certification consists of both a field exam and a written exam. The individual must pass both exams to obtain certification. In order to pass, the individual must achieve a 70% or higher on the written exam. They must achieve an 82% or higher on the field exam **and** must pass all gated items.

BPI EA Renewal

BPI Certified Professionals who hold the Energy Auditor certification will be required to renew their certification every three (3) years. The renewal consists of 1) Completing the renewal application, 2) Passing a field exam, and 3) **Either** passing an online exam **OR** meeting relevant continuing education units (CEU) requirements.

QCI Requirements

QCI Mentee Option

Individuals who have successfully completed the SOM or BPI EA certification may apply to BCAEO to be a QCI mentee. Under the mentorship of a certified QCI, the QCI mentee may perform work aligned with the QCI Job Task Analysis, including Final Inspections, monitoring, and the collection of field site data and/or conducting reviews of energy models, but all work must be reviewed and approved by a certified QCI (the mentor).

The QCI mentee's mentor(s) must be first agreed to by BCAEO and the Grantee before the QCI mentee work can commence. Weatherization managers must send QCI mentee requests to MDHHS-BCAEO@michigan.gov and include the names of the proposed QCI mentee and mentor.

When approved, QCI mentees may serve in this role for up to 18 months or until they achieve BPI QCI certification, whichever is sooner. All work performed by the mentee must be reviewed and attested by the mentor which includes the printed names, signatures, certification number (for the mentor) and dated by both the mentor and mentee. Once the individual has achieved the BPI QCI certification, they may serve as a QCI and no longer need to follow mentee requirements.

BPI QCI

In order to work in the QCI JTA, an individual must, at minimum, hold:

- BPI EA certification
- BPI QCI certification

For more details on the BPI QCI certification, please see the BPI QCI Scheme Handbook or contact MiTEC at MDHHS-MiTEC@michigan.gov.

QCI Prerequisites

BPI QCI Initial

In order to take the QCI written exam, an individual must first hold an active BPI EA certification.

BPI QCI Renewal

To be eligible for certification renewal, BPI certified Quality Control Inspectors must hold an active BPI Energy Auditor certification at time of renewal.

QCI Certification Process

BPI QCI

The BPI QCI certification consists of holding an active BPI EA Certification and successfully pass the written QCI exam. In order to pass, the individual must achieve a 70% or higher on the 50-question written exam.

BPI QCI Renewal

- May accumulate a minimum of six (6) qualifying* continuing education units (CEUs) over the three (3) years of certification in order to bypass the online exam, **OR**
- Successfully challenge the online exam that is current at the time of renewal.

*Qualifying CEUs are defined as any educational trainings/sessions that align with the Job Task Analysis (knowledge, skills, and abilities) section in the Quality Control Inspector certification scheme handbook.

Multifamily EA Requirements

Individuals that hold either the SOM or BPI EA certification are eligible to complete energy audits in multifamily buildings (5+ units and shelters) if they successfully complete a comprehensive training program based on the NREL Multifamily Quality Control Inspector JTA.

Multifamily QCI Requirements

Individuals that hold the BPI EA certification and BPI QCI certification are eligible to complete quality control inspections in multifamily buildings (5+ units and shelters) if they successfully complete a comprehensive training program based on the NREL Multifamily Quality Control Inspector JTA

Licenses and Insurance Requirements

Licenses

The following licenses are required for contractors working in the indicated roles:

- Retrofit Installer/Crew Leader:
  - Residential Builders License **OR**
  - Residential Maintenance & Alterations License
- Mechanical:
  - Mechanical License **OR**
  - Boiler License

Agencies whose employees work as crews must have at least one employee on staff who holds their builders/alteration license for the crew work to operate under.

Insurances
Specific insurances are required for all Grantees' contractors, dependent on their performed activities, per MDHHS boilerplate contract language. Please refer to the most recent WAP contract with your agency for insurance requirements.

EPA firm
EPA's Lead Renovation, Repair and Painting Rule (RRP) Rule requires that firms performing renovation, repair and painting projects that disturb lead-based paint in homes, childcare facilities and pre-schools built before 1978 be certified by EPA (or an EPA-authorized state), use certified renovators who are trained by EPA-approved training providers and follow lead-safe work practices. It is required that weatherization providers maintain EPA Lead-Safe firm certification and have certified renovators to ensure work can be done at all potential jobs. 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. Grantees or contractors can visit the EPA website to submit firm certification and for steps for individuals to become certified renovators.

Agency Documentation Requirements
Grantees must provide documentation for all training, certification, licenses and insurance requirements met outside of MiTEC. For any trainings and certification completed through MiTEC there are LMS records that meet the documentation requirement and agencies are not required to submit these documents to BCAEO.

ATTACHMENTS
- **BPI EA/QCI JTA**
- **BPI CL/RIT JTA**
- **Career paths**

LINKS
- EA NREL JTA
- QCI NREL JTA
- CL NREL JTA

618.1 – ENERGY AUDITOR DECERTIFICATION/QC INSPECTOR SUSPENSION

REFERENCES

- State of Michigan DOE State Plan
- Michigan Weatherization Field Guide
- Community Services Policy Manual
- Weatherization Program notice 22-4
- 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

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

<u>Level One Violations</u>

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 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

BCAEO will, to the best of its ability, determine which agencies an individual with any level of violation works with and notify them of the violation.

If the BCAEO revokes, modifies, conditions, refuses to renew, or suspends a certification, it shall inform the Energy Auditor/QC Inspector in writing of the reason for the action and shall include a copy of the appeals procedure. All appeals must be submitted in writing to the Director of Bureau of Community Action and Economic Opportunity, Michigan Department of Health & Human Services at:

Bureau of Community Action and Economic Opportunity
235 S. Grand Ave. Suite 204
PO Box 30037

Lansing, MI 48909

Energy Auditors/QC Inspectors have 20 business days from the date of notification to appeal the action.

Appeals Process

The Energy Auditor/QC Inspector may request a hearing before the Energy Auditor/QC Inspector Certification Appeals Panel. Panel members will be appointed within 10 work days of the receipt of the appeal request. The panel will consist of:

- One DHS Bureau staff, appointed by the BCAEO Director;
- Two Local Weatherization Operators, appointed by the Michigan Community Action Agency Association (MCAAA) Weatherization Committee Chair;
- One CAA Executive Director, appointed by the Michigan Community Action Agency Association (MCAAA) Executive Director, and
- One member of the Commission on Community Action and Economic Opportunity; appointed by the Commission Chair.

A formal hearing will be conducted within 30 business days of the receipt of the appeal request. The panel will inform the appeals applicant in writing of its decision.

Panel Review Process

The review process will include the following elements:

Convening of the panel

- Panel members will select a panel spokesperson. Panel will review any written documents submitted to date.

Presentation

- BCAEO staff will present a summary regarding reason(s) for the recommended action. This summary may be presented to the panel in writing, in person, or via electronic communication.
- Appellant will be given an opportunity to present a summary regarding reason(s) that BCAEO decision is not appropriate and supporting documentation as applicable. This summary may be presented to the panel in writing, in person, or via electronic communication.
- Panel members will communicate any points of clarification needed with the parties.

Deliberation and Decision

- The panel will review summary presentations, documentation and clarifications provided and render a decision.
- A decision based on simple majority will prevail.
- The panel spokesperson will communicate the panel's decision to the appellant and the BCAEO Director in writing.

Decertification Period

Revocation of an Energy Auditor or suspension of QC Inspector's performing audits for the MI WAP program shall be for a minimum of 6 months from the date of notice of decertification, suspension, or of the appeals panel notice, whichever is later.

Decertified Energy Auditor or suspended QC Inspectors may request renewal of certification at the end of the decertification period. The decertified Energy Auditor/QC Inspector must have a network grantee agency sponsor this request. The decertified Energy Auditor or suspended QC Inspector must attend IREC accredited Energy Auditor or QC Inspector training 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.

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) mandates that federal agencies consider the effects of their undertakings on historic properties, in consultation with Federally recognized tribes, State Historic Preservation Officers, and other consulting parties. Section 106 applies to United States Department of Energy (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 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 OE Contracting Officer.

The Michigan SHPO Programmatic Agreement (PA) has been extended until December 2025. This PA outlines the terms of the Section 106 review process in Weatherization jobs.

POLICY

The following process shall be used to determine whether a SHPO review is mandatory, and if so, how to engage Section 106 consultation for projects funded under the WAP program.

Required Section 106 SHPO Consultation

Section 106 consultation 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 SHPO consultation 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.

If SHPO is engaged in consultation, but the agency finds the final scope of work to be exempt, then the SHPO must be notified that the work is exempt to conclude consultation.

Initiating Consultation with SHPO

Grantee must ensure that all weatherization activities not included in the list of categorical exclusion activities in Section 2.8 of WPN 21-1 is submitted to MDHHS-BCAEO@michigan.gov to process an environmental review submission according to the National Environment Policy Act of 1969.

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 photographs of the property. Photographs should at minimum include a façade photo that shows the whole building, clear of obstructions. Additional photos of side and rear elevations are helpful to include. 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.

SHPO Responses

By law, SHPO has 30 days to respond after receiving information. If additional information is requested, the clock stars over once information is received. A SHPO historian will assess the information submitted compared to records on file to determine whether the property is listed in the National Register of Historic Places (NRHP) or meets the Criteria of Eligibility for listing in the NRHP. If either is the case, then the property is historic. If the property is not listed and does not appear to meet the Criteria, then it considered not historic.

More Information:

The historian may require more information to make a finding of eligibility. They may respond and ask for additional photos, streetscape images, and historical information on the property. When more historical information is requested, please also send the proposed scope of work for the project to expedite the review once additional information is received.

Not Historic:

For properties that do not appear to meet the criteria of eligibility, the SHPO historian will either sign and mail the response sheet or send an automated email noting that the property is not historic and consultation is complete.

Historic:

If a property is historic, then the SHPO historian will notify the project coordinator either by mail or email depending on how the project was submitted. The notification will include a request to send additional photographs, showing elevations of the building not included in the initial consultation, a narrative description of the work being performed, product information/cut sheets for products used with the project, and any relevant building plans/specifications.

After reviewing the project specifications, and any additional information requested, SHPO will issue an opinion of effect in a formal letter.

SHPO may find that the project will have No Adverse Effect on historic resources, in which case consultation is complete.

SHPO may find that the project will have a Conditional No Adverse Effect, meaning the effect will not be adverse provided certain conditions are met. If the project coordinator agrees with the conditions, they must sign the concurrence form and return it to SHPO. **Consultation is not complete until the concurrence form is signed**. If the project coordinator does not agree to the conditions, then consultation continues.

SHPO may find that the proposed work will have an Adverse Effect on historic properties, in which case the federal agency and SHPO must come to an agreement on how to mitigate or minimize effects. Adverse Effects are rare and usually avoidable.

If the scope of work changes after being reviewed by SHPO, consultation must be reopened to consider the effects of the newly proposed work.

Client File Documentation

For any unit that meets the criteria listed in the Required Section 106 SHPO consultation above, a DOE WAP Historic Preservation Checklist must be completed and retained in the client file.

For any unit that requires a Section 106 SHPO consultation, the completed *State Historic Preservation Office of Michigan Historic Significance Response Sheet* must also be retained in the client file. For digital submissions, this would be the automated email response.

Monitoring

Grantees may be monitored by the DOE for compliance with this guidance. SHPO also tracks projects received and may follow-up if requests for consultation are not answered. 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.

If SHPO requested more information or signed concurrence on a project, and the project was cancelled, please notify SHPO to conclude consultation.

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

Expansion of Network

MDHHS-BCAEO reserves the right to schedule a bid sooner than the expiration of the previous Invitation to Bid in order to expand statewide weatherization operational capacity, to provide a statewide weatherization solution for contractor shortages, and/or to meet demands of multifamily weatherization jobs.

Cause for Reduction of Funding- Statewide Redistribution of Funds

Department of Health & Human Services (DHHS) may do a statewide redistribution of weatherization funds in response to any of the following:

1. A review of each Grantee's spending and production resulting in the need to adjust Grantee allocations to maximize the number of homes weatherized in Michigan.

2. The results of the most recently available census or other appropriate data.

3. Notification of funding decreases by the funding source.

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

The US Department of Energy encourages state offices to reallocate funds at least every quarter to those high performing Grantees that demonstrate a commitment to meeting/exceeding quarterly production and spending targets.

Cause for Termination of Funding

A rating of "high risk" in the weatherization portion of the assessment (scores 1 STAR or 2 STARs) for two consecutive years on the annual STAR Assessment performed by MDHHS-BCAEO, may result in contract termination and a competitive proposal process for the subgrantee's territory after the current contract expires.

OR

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.

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

- 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.

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:

- 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 ≥ 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

down cost has an SIR ≥ 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 ≥ 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 ≥ 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

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.

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

individual's participation in WAP, such as name, address, or income information. Thus, BCAEO and Grantees should extend that same protection to their client records for WAP. States may release information about recipients in the aggregate and which does not identify specific individuals. For example, information on the number of recipients in a county, city, or a zip code does not compromise the privacy of the recipients.

A Grantee can provide aggregate data, as defined in the paragraph above. The Grantee is responsible for ensuring the data is accurate and what has been reported to BCAEO.

Grantees may share pertinent information to subcontractors when a) use of a subcontractor is acceptable per the agreement language b) the disclosure is necessary or otherwise naturally occurs in connection with work that is within the subcontractor's scope of responsibility, and (C) the Grantee obligates the subcontractor in a written Agreement to maintain the state's confidential information in confidence. At the state's request, any employee of the Grantee and of any subcontractor having access or continued access to the state's confidential information may be required to execute an acknowledgment that the employee has been advised of the Grantee's and the subcontractor's obligations under this section and of the employee's obligation to the Grantee or subcontractor, as the case may be, to protect the confidential information from unauthorized use or disclosure

Data Requests/Data Sharing

Data related to a Grantees Weatherization program is confidential. Sharing identifying information, when necessary, is acceptable between the Grantee and the BCAEO. If an agency receives a request for confidential data from entities or persons other than the State, the Grantee must submit a request for approval to the state.

Participation in Weatherization Related Evaluations, Studies, and Surveys

All requests to participate in Weatherization related Evaluations, Studies, and Surveys must be submitted for approval to BCAEO. BCAEO will review with the DOE to ensure there is not a breach of confidentiality. Additionally, BCAEO will determine if the study is relevant to the intent of the Weatherization Assistance Program.

Grantees that receive a request to participate in an activity outlined above, the Grantee should obtain the following information before submitting to BCAEO:

- All interested parties involved in activity
- Purpose/Hypothesis of activity

- Data that will be collected
- Estimated length of time to complete activity
- Method of Evaluation of Results
- Where results will be published and/or shared

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

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.

Reweatherization work

In the event of a declared federal or state disaster, weatherization crews may return to a unit reported as a completion to DOE that has been “damaged by fire, flood, or act of God, to be re-weatherized, without regard to the date of weatherization”. 10 CFR 440.18(f)(2)(ii). Local authorities must deem the dwelling unit(s) salvageable as well as

habitable and the damage to the materials is not covered by insurance or other form of compensation.

Grantee Requests for Disaster Relief Funds

If funding is available, BCAEO will consider all requests from Grantees for disaster relief funds that meet the outlined criteria. The requests must include the following components:

- Overview of disaster
- Date disaster was declared a federal or state disaster
- Additional funding requested, if applicable
- How weatherization funds/weatherization work will be utilized to enhance disaster relief funds in the federal or state defined disaster area.

Grantees must submit requests to the MDHHS-BCAEO@michigan.gov mailbox. Once submitted, BCAEO will review with the assistance of the DOE.

Funding for Disaster Planning and Relief

If BCAEO approves a Grantee disaster relief plan, an agency can dedicate current year allocation and funding to the identified disaster area and serve that area as priority over other areas.

In the event the Grantee requests additional funding for the disaster relief efforts, BCAEO, with the approval of DOE via the state plan, reserves the right to allocate additional funds to a designated disaster site if the state.

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:

(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:

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

38.	HVAC Systems	Evaporative cooler	☐	15
39.	HVAC Systems	Install/Replace heatpump	☐	15
40.	Base Loads	Lighting retrofits	☒	15
41.	Base Loads	Refrigerator replacement	☒	15
42.	Base Loads	Water heater tank insulation	☐	13
43.	Base Loads	Water heater pipe insulation	☐	13
44.	Base Loads	Lo flow showerheads	☐	15
45.	Base Loads	Water heater replacement	☒	13

MHEA

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

33.	Doors and Windows	Glass storm windows in Addition	☒	15
34.	Doors and Windows	Add awnings	☐	10
35.	Doors and Windows	Add awnings in Addition	☐	15
36.	Doors and Windows	Add shade screens	☐	10
37.	Doors and Windows	Add shade screens in Addition	☐	10
38.	HVAC Systems	Setback thermostat	☒	15
39.	HVAC Systems	Tune heating system	☒	3
40.	HVAC Systems	Evaporative cooling	☐	15
41.	HVAC Systems	Tune cooling system	☐	3
42.	HVAC Systems	Replace dx cooling equipment	☐	15
43.	Baseloads	Lighting Retrofits	☒	15
44.	Baseloads	Refrigerator replacement	☒	15
45.	Baseloads	Water heater tank insulation	☐	13
46.	Baseloads	Water heater pipe insulation	☐	13
47.	Baseloads	Low flow showerheads	☐	15
48.	HVAC	Water heater replacement	☒	13
49.	HVAC	Replace heating system	☒	20

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

LWO Name
LWO Address
LWO City, State, Zip
LWO phone #

WEATHERIZATION ASSISTANCE PROGRAM (WAP)
OWNER/LANDLORD CONTRIBUTION POLICY
SINGLE FAMILY AND MULTIFAMILY PROJECTS

LWO name must balance various rules around owner/ landlord contributions. The following 3 policies are true:

1. For Low Income Home Energy Assistance Program (**LIHEAP)** Weatherization, LWO name **must require not less than 25% of the total cost** of the weatherization services for **any rental property. Funds must** be contributed by the property owner/landlord unless the property owner is also eligible for weatherization assistance or is a nonprofit organization, governmental agency, or municipal organization.

2. For Department of Energy (**DOE)** Weatherization, per WPN 16-6 FAQ, LWO name **may not require owner/landlord contributions for single family rentals**. In fact, the cited 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". LWO name can encourage owners/landlords that are able to contribute to do so as part of the weatherization work being completed.

3. For **DOE and LIHEAP** Weatherization, per 10 CFR 440.22(d), "a state may require financial participation, when feasible, from the owners of such buildings **[multifamily buildings]."** Except in cases where the owner/landlord also qualifies for weatherization services, Michigan **requires financial participation** of an owner/landlord for weatherization of a multifamily property unless express case by case waiver for contribution is granted. **Amount of financial participation is determined at the local level and must be spelled out in written Owner/Landlord Contribution Policy.**

<u>Single Family Rentals:</u>
LWO name must adhere to the following:

- For the LIHEAP portion of the job, a 25% contribution is required by the property owner/landlord if they do not meet the exceptions listed in item 1 above.
- For the DOE portion of the job, a contribution is not required, following item 2 above. LWO name encourages a contribution if the owner/landlord is capable.

<u>Multifamily Rentals:</u>
LWO name requires a contribution from the owner/landlord that may:

- Include a cash contribution
- Include rent reduction to the tenant
- Include consideration of documented improvements made to the property within the last twelve months
- Include a combination of the three items listed above
- Be not less than 25% of the entire project cost
- Include the Energy Audit (EA) Fee, which covers, at minimum, the cost of the energy audit and preliminary assessment of project viability
- Be waived if the property owner/landlord also qualifies for weatherization services or there is a case-by-case waiver granted by MDHHS-BCAEO

The U.S. Department of Energy considers owner/landlord contributions leveraged/bought down funds, and as such, they are to be used to expand energy efficiency services and/or increase the number of dwelling units

weatherized. Therefore, LWO name will apply cash contributions to labor and/or material costs. LWO name will apply cash contributions to reduce the costs in the program year they are received.

The owner/landlord contribution can be used to leverage or buy down a Savings to Investment Ratio (SIR) package of measures in a multifamily weatherization project in compliance with Community Services Policy Manual (CSPM) 608, CSPM 622, Weatherization Program Notice (WPN) 16-5 and WAP Memo 035.

LWO name will maintain documentation that supports the disposition of owner/landlord contributions as agreed upon between LWO name and the owner/landlord.

Shelters, Group Homes and Transitional Living Facilities may not be considered for Landlord contribution. Grantees wishing to use their own policy(ies) must submit the draft policy to BCAEO for approval prior to implementation. See CSPM 608.1

Date governing board approved this Owner/Landlord Contribution Policy (if the LWO is a Community Action Agency): _____

WEATHERIZATION ASSISTANCE PROGRAM (WAP)
PRELIMINARY OWNER/LANDLORD AGREEMENT
MULTIFAMILY PROJECTS

This Agreement is made and entered into by and between LWO Name and

_____

Property Owner, for

_____

Address of Building to be Weatherized

This Agreement shall begin on _____Click or tap to enter a date.(start date) and shall end when all post inspections and monitoring are complete. The parties agree as follows:

- The building referenced above is being considered for weatherization services under the Weatherization Assistance Program (WAP). WAP is funded by the US Department of Energy (DOE) and Low Income Home Energy Assistance Program (LIHEAP) which is administered in Michigan by the Bureau of Community Action and Economic Opportunity (BCAEO). The WAP operates under the rules and regulations of both DOE and BCAEO, both of which have certain requirements of which the building owner should be aware.
- The Owner has been provided with an Owner/Landlord Agreement, as well as other information about the WAP.
- A financial commitment from the building owner/landlord is required to weatherize each building containing rental units, except where the owner/landlord is an eligible applicant. The required commitment for the building will be determined by LWO name policy. When the audit is complete, LWO name and the owner/landlord will meet to discuss and develop the work scope, financial commitment, and other terms of the Owner/Landlord Agreement.
- The Owner understands that Weatherization is a multistep process. Based on the energy audit, weatherization may include multiple site visits by various contractors. The length of the WAP process depends on the number of units and scope of work determined by the energy audit. The Owner understands and agrees to in-progress inspections, quality control inspections, and state monitoring.
- The Owner understands that the purpose of the WAP is to ensure weatherization services are being provided to low-income persons who live in all types of housing, including multifamily buildings. The Owner understands that the benefits of weatherization assistance in connection with the rental units within the building referenced above must accrue primarily to the low-income occupants residing in those units, both in cases where utilities are paid by the occupant or are included in rent.
- The Owner of the building referenced above agrees to coordinate with each occupant and hereby grants permission for representatives of LWO name to enter this building to conduct an energy audit, perform certain health and safety tests, and collect eligibility documentation from the occupants.

In witness thereof, the parties have executed this Agreement.

_____	_____
Owner Signature	Date
_____	_____
LWO name Representative Signature	Date

LWO Name
LWO Address
LWO City, State, Zip
LWO phone #

WEATHERIZATION ASSISTANCE PROGRAM (WAP)
OWNER/LANDLORD AGREEMENT
SINGLE FAMILY AND MULTIFAMILY PROJECTS

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

LWO Name and Owner/Landlord Name
At 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 LWO Name 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 located on 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. LWO Name agrees to provide certain weatherization program improvements to the premises of the Owner/Landlord and occupied by the eligible household(s). Such improvements may include any or all of the measures identified from the energy audit. The parties agree that LWO Name shall not commence, or cause to be commenced, weatherization work unless the Owner/Landlord has provided the full amount of required investment that is identified in Exhibit C.

2. In consideration for the weatherization improvements, the Owner/Landlord does 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/Landlord agrees to maintain the weatherization materials installed under this Agreement, in accordance with all relevant codes regarding maintenance.

4. The Owner/Landlord 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/Landlord 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/Landlord agrees and consents to permit LWO Name and its employees to enter upon the premises for the purpose of making the weatherization improvements. LWO Name 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 LWO Name.

7. The Owner/Landlord hereby swears or affirms that the building(s) is not presently being offered for sale and further agrees to give LWO Name thirty (30) days notification of the sale or conversion of the building. At least ten (10) days prior to the sale or conversion the Owner/Landlord agrees to obtain, in writing, the purchaser's consent to assume the Owner/Landlord's obligations under this Agreement or, if this consent is not obtained, to pay LWO Name the full cost of weatherization pro-rated by the number of months left under this Agreement.

8. The Owner/Landlord agrees to provide LWO Name 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 LWO Name as soon as practicable after it is received by the Owner/Landlord. In situations where the tenant is responsible for paying the electric and/or fuel bill, LWO Name should request this information from the tenant or utility company.

9. The Owner/Landlord agrees to provide sufficient detail and explanation to allow determination that accrual of benefit requirements in 10 CFR 440.22 have been met. The accrual of benefits requirement may be met by demonstrating that the benefits of weatherization accrued primarily to the tenant by completion of the table on Exhibit D.

10. The Owner/Landlord agrees that if LWO Name determines a unit(s) is eligible for refrigerator replacement(s), the replacement(s) will be done in accordance with the WAP program standards located in the Michigan Weatherization Field Guide. The refrigerator being replaced must be surrendered without exception.

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

Owner of existing refrigerator in this rental unit:	Property Owner/Landlord insert name
Eligible Household	insert name_____

12. In the event that the Owner/Landlord increases the rent charged to an eligible household occupying an eligible dwelling unit, the occupant(s) of the eligible dwelling unit as third-party beneficiaries of the Agreement can assert any direct claims against the Owner/Landlord in any action or special proceeding in any court of appropriate jurisdiction.

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

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

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

16. LWO Name shall provide a synopsis of the terms of this Agreement to the households occupying each eligible dwelling unit within 30 days of the date of the weatherization completion date of this Agreement. Further, LWO Name shall provide, or cause the owner/landlord to provide, a synopsis of the terms of this Agreement to subsequent households occupying each eligible dwelling unit and to the new and subsequent occupants of eligible dwelling units vacant as of the weatherization completion date of this Agreement.

17. LWO Name shall provide any occupant of an eligible dwelling unit access to this document in accordance with federal and state laws.

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

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

_____ _____

Signature of Owner/Landlord or Authorized Representative Date

_____

Owner/Landlord'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.

STATE OF MICHIGAN
MULTIFAMILY WEATHERIZATION ASSISTANCE PROGRAM
LANDLORD AGREEMENT

EXHIBIT A
ELIGIBLE DWELLING UNITS AND RENT

Building Address: __insert address_____

The documented eligible dwelling units, including designated eligible vacant units, 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:

Unit Number or Description	Occupied or Vacant	Monthly Rent
unit number	Occupied	rent
unit number	Occupied	rent
unit number	Occupied	rent
unit number	Occupied	rent
unit number	Occupied	rent
unit number	Occupied	rent
unit number	Occupied	rent
unit number	Occupied	rent
unit number	Occupied	rent
unit number	Occupied	rent
unit number	Occupied	rent
unit number	Occupied	rent
unit number	Occupied	rent

The designated vacant eligible dwelling units 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).

_____

Signature of Owner/Landlord or Authorized Representative Date

_____

Signature of LWO Name Representative Date

STATE OF MICHIGAN
WEATHERIZATION ASSISTANCE PROGRAM
LANDLORD AGREEMENT
MULTIFAMILY PROJECTS

EXHIBIT A - CONTINUED
ELIGIBLE DWELLING UNITS AND RENT

Building Address: __insert address_____

Unit Number or Description	Occupied or Vacant	Monthly Rent
unit number	Occupied	rent
unit number	Occupied	rent
unit number	Occupied	rent
unit number	Occupied	rent
unit number	Occupied	rent
unit number	Occupied	rent
unit number	Occupied	rent
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unit number	Occupied	rent
unit number	Occupied	rent
unit number	Occupied	rent

STATE OF MICHIGAN
WEATHERIZATION ASSISTANCE PROGRAM
LANDLORD AGREEMENT
SINGLE FAMILY AND MULTIFAMILY PROJECTS

EXHIBIT B
WORKSCOPE

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

Multifamily homes with five or more units will be evaluated for appropriate measures by a DOE-approved audit subject to the approval by the Michigan Department of Health and Human Services Bureau of Community Action and Economic Opportunity.

Measures that are being considered include the following:

(List of measures from the audit.)

The Owner has paid LWO Name an Energy Audit fee in the amount of $_____. The Energy Audit fee shall be credited towards the investment that the Owner agrees to make towards completion of the Work Scope as detailed in Exhibit C. **OR**

The Owner and LWO Name have agreed to a contribution of:

_____

The Owner agrees to contribute to the Weatherization items listed above in the total amount of $_____. The Owner hereby swears or affirms that these monies are project funds and are not federal dollars.

_____

Signature of Owner or Authorized Representative Date

_____

Signature of Local Weatherization Operator Representative Date

STATE OF MICHIGAN
WEATHERIZATION ASSISTANCE PROGRAM
LANDLORD AGREEMENT
LIHEAP SINGLE FAMILY AND MULTIFAMILY PROJECTS

EXHIBIT C
LANDLORD CONTRIBUTION AGREEMENT

Landlord contribution options (please select which will be utilized for project) *(The LWO may use its own policy to adjust this list. This is a sample. The list must match the landlord contribution policy above)*

___Cash contribution
___Include rent reduction to the tenant
___Include consideration of documented improvements made to the property within the last twelve months
___Include a combination of the three items listed above
___Is 25% of the entire project cost
___Includes the Energy Audit Fee, which covers, at minimum, the cost of the energy audit and preliminary assessment of project viability

Describe how this contribution will be fully utilized (for LWO and property owner to agree upon):

Established landlord contribution cap: _____

A waiver to the landlord contribution may be granted if the property owner also qualifies for weatherization services or there is a case-by-case waiver granted by MDHHS-BCAEO.

Will there be a waiver to the landlord contribution? YES NO

If yes, why?

___Property owner meets WAP qualification requirements

___Waiver granted from MDHHS-BCAEO

_____
Signature of Owner or Authorized Representative Date

_____
Signature of LWO Name Representative Date

STATE OF MICHIGAN
MULTIFAMILY WEATHERIZATION ASSISTANCE PROGRAM
LANDLORD AGREEMENT
LIHEAP SINGLE FAMILY AND MULTIFAMILY PROJECTS

EXHIBIT D
TENANT BENEFIT ACCRUAL

The accrual of benefits requirement may be met by demonstrating that the benefits of the weatherization accrued primarily to the low-income tenant(s). All owners/landlords of multi-unit buildings must submit sufficient detail and explanation to allow determination that requirements of 10 CFR 440.22 have been met. The LWO is encouraged to establish procedures that will ensure that all owners/landlords of multifamily buildings determine tenant benefit accrual.

The following table is meant to convey which potential tenant benefits are valid for different utility payment arrangements. (*The table below is a sample and may be adjusted as necessary.)*

ACCRUAL OF BENEFITS

Potential Benefit	**Tenant Pays Utilities**	**Utilities Included in Rent**	**Check if Applicable**
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 in 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 10 CFR 440.22(b)(3)(ii)	Yes	Yes	☐
Additional improvements, not related to weatherization, to heat and hot water distribution, and ventilation, to improve the comfort of occupants	Yes	Yes	☐
Investment of the energy savings in facilities or services that offer measurable direct benefits to tenants Description: Click to enter text	Requires description	Yes	
Investment of the energy savings from the weatherization work in specific health & safety improvements with measurable benefits to tenants Description: Click to enter text	Requires description	Yes	
Establishment of a shared savings program Description: Click to enter text	Requires description	Yes	

LWO Name
LWO Address
LWO City, State, Zip
LWO phone #

STATE OF MICHIGAN
WEATHERIZATION ASSISTANCE PROGRAM
LANDLORD AGREEMENT
SINGLE FAMILY AND MULTIFAMILY PROJECTS

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 LWO Name 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 LWO Name 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 Michigan Field Guide. 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 LWO Name by telephone or write to the address as identified on this document.

As a third-party beneficiary of the Agreement, the Tenant agrees to provide a copy of income eligibility documentation, monthly utility bills, current phone (home/cell) numbers, availability, and access for the weatherization work.

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)

HAZARD IDENTIFICATION AND NOTIFICATION

Michigan Department of Health & Human Services
Agency Name
Agency Address, Agency Phone #

WRITTEN NOTIFICATION

The following conditions exist at _____,

Work Order Number: _____ and have been identified as the following hazard(s):

☐ **Potential Safety Hazard** ☐ **Indoor Air Quality Hazard** ☐ **Asbestos Containing Materials Hazard**

Description and location of hazard(s):

_____
_____
_____
_____

Recommended action:

_____
_____
_____
_____

VERBAL NOTIFICATION

I have covered the following topics **verbally** with _____ and I have answered any questions the client had regarding these topics:

☐ Heating system use and maintenance, proper furnace filter replacement intervals

☐ Proper disposal of unused fuel

☐ Asbestos: do not disturb suspected PACMs

☐ Recommendation to contact local Health Department

☐ Code compliance—how to seek remedy of condition

☐ CO/Smoke Detector testing, maintenance, battery replacement, what to do when alarm is activated

☐ Ventilation requirements

☐ Window safety, glass/guards requirements

EA/QCI Name _____

EA/QCI Signature_____ Date _____

Client Name _____

Client Signature_____ Date_____

Purpose of this form: This form serves to satisfy the client notification and client education requirement set forth in WPN 22-7 and the Michigan Weatherization Health & Safety Plan in CSPM 614. All required written and verbal client notifications are spelled out in the Michigan Weatherization Health & Safety Plan and must be documented using this form. The notification must be signed by the client and the assessor/auditor, and a copy maintained in the client file. Client education, as outlined in the Michigan Weatherization Health & Safety Plan, is required only when an issue exists. When deferral is necessary, the Weatherization provider will follow its own written deferral policy, referencing CSPM 609.

Asbestos 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 Health and Human Services will not exclude from participation in, deny benefits of, or discriminate against any individual or group because of race, sex, religion, age, national origin, color, height, weight, marital status, gender identification or expression, sexual orientation, partisan considerations, or a disability or genetic information that is unrelated to the person's eligibility.

DHS-552-A, RELEASE OF LIABILITY AND WAIVER OF CLAIMS

Michigan Department of Health and Human Services (MDHHS)

Agency Name

Address and Phone Number

(Revised 5-22)

SECTION 1 – HEALTH AND SAFETY ASSESSMENT

Notice: In addition to the Energy Audit, a limited health and safety assessment will be done on the home, which 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. Please note that the Energy Auditor is not a qualified mold professional. Mold may be present in areas not accessible or seen during the visual inspection or during the work on your home. ASHRAE 62.2 fans are installed to address excess moisture and inadequate air changes in the home. Mold can be a problem in any home, and if there is existing mold in areas that are seen or unseen, we shall not be held responsible or liable. Weatherization work on your home will be performed in a manner to prevent future mold growth.

Recommendation: After weatherization is complete, it is recommended that all items and materials installed in homes not be altered, adjusted, or removed. This recommendation also refers to the installation of ASHRAE fans, or any other fan which was installed for ventilation. ASHRAE 62.2 does not account for high polluting sources or guarantee indoor air quality; however, any tampering or adjustment of installed materials or ventilation fans may result in added moisture, may contribute to poor indoor air quality, or may encourage mold growth. The agency and its contractors will be held harmless for any future moisture or mold problems that are the result of installation tampering or which are not directly attributable to weatherization work.

SECTION 2 – 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 small amounts of insulation spilling into living areas of the home. We will be responsible for any insulation spills, work debris and materials, or typical construction clean-up. However, dust is inevitable during any type of weatherization work, and any remaining dust clean-up or fine cleaning after completion of weatherization will be the responsibility of the homeowner/occupant.

Recommendation: It is recommended that any household items near insulation activities be removed or covered prior to insulation blowing. People with the following health conditions should consider leaving the home when insulation is being blown: 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. Additionally, it's 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 not return to the house for at least 30 minutes after completion of insulation activities.

Release and 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,

SECTION 3

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. If I have any questions, I can contact the agency listed on the top of page one.

Client Name		Phone	Job Number	
Address		City	State	Zip Code
Client Signature	Date	Agency Witness		Date

The Michigan Department of Health and Human Services will not exclude from participation in, deny benefits of, or discriminate against any individual or group because of race, sex, religion, age, national origin, color, height, weight, marital status, partisan considerations, or a disability or genetic information that is unrelated to the person's eligibility.

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: _____

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 your for your cooperation.

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

*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.

DHS - 1008 (Rev. 4/08) Previous edition obsolete.

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)

Yes/NA

☐ / ☐ 1. Standard Application Form, DHS-4283

☐ / ☐ 2. Income Eligibility Documentation and Calculations

☐ / ☐ 3. Home Ownership

☐ / ☐ 4. Landlord Agreement/Exhibits/Tenant Synopsis/ and Lease

☐ / ☐ 5. Documentation of Landlord Contribution (if applicable)

☐ / ☐ 6. Priority Criteria Selection

☐ / ☐ 7. Documentation of Annual Heating and Electric Usage

☐ / ☐ 8. Written Notification of Eligibility/Ineligibility
- a. Notification of Job Scheduling
- b. Notification of Appeal Process

II. JOB-RELATED

Yes/NA

☐ / ☐ 1. Approved Audit

☐ / ☐ 2. 552 Health and Safety Assessment Findings

☐ / ☐ 3. 552A Release of Liability and Waiver of Claims

☐ / ☐ 4. NEAT Job Input Summary Report/NEAT Output Summary Report

☐ / ☐ 5. Confirmation of Receipt of Lead Pamphlet

☐ / ☐ 6. Client Energy Plan of Action

☐ / ☐ 7. Asbestos Notification Letter DHS -4290

☐ / ☐ 8. Notice of Indoor Air Quality Concern DHS -4289

☐ / ☐ 9. Notice of Potentially Unsafe Condition DHS -4288

☐ / ☐ 10. Certificate of Insulation

☐ / ☐ 11. Contractor's Invoice

☐ / ☐ 12. Post-inspection Documentation/Corrections Approved

☐ / ☐ 13. Client Inspection/Assessment DHS -1008

☐ / ☐ 14. Appliance Replacement/Disposal Documentation

☐ / ☐ 15. Permit(s) for Furnace or Water Heater Replacement

☐ / ☐ 16. Other _____

☐ / ☐ 17. _____

☐ / ☐ 18. _____

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.

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
☐ Bath *(location)*:	_____	☐	☐	_____	☐
☐ Shower *(location)*:	_____	☐	☐	_____	☐
☐ Kitchen		☐	☐	_____	☐
☐ Laundry Area		☐	☐	_____	☐
☐ Basement Walls		☐	☐	_____	☐
☐ Crawlspace		☐	☐	_____	☐
☐ Exterior Walls		☐	☐	_____	☐
☐ Attic		☐	☐	_____	☐
☐ Ceilings		☐	☐	_____	☐
☐ Other *(specify)*	_____	☐	☐	_____	☐

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

WEATHERIZATION MEASURES

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

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

Local Weatherization Operator Inspector

Date

GRANTEE LETTERHEAD

Dear Homeowner/Renter:

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

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

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

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

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

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

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

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

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

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

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

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

Very Truly Yours,

WEATHERIZATION ENERGY EDUCATION
FOLLOW-UP SURVEY

OWNER/RENTER NAME	
ADDRESS	DATE
	TELEPHONE

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

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

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

Weatherization Grantee Health and Safety (H&S) Plan - *Optional Template*

CSPM 614 Attachment

1.0 – General Information

Additional information 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 22-7, 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 meet 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 verses 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 within five business days, including the conditions that must be met in order for weatherization to move forward. See CSPM 609 for further details on Weatherization deferrals.

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.

2.0 – BUDGETING

Grantees are encouraged to budget H&S costs as a separate category and, thereby, exclude such costs from the Average Cost Per Unit (ACPU) cost limitation. This separate category also allows these costs to be isolated from energy efficiency costs in program evaluations. H&S costs that 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 Grantee's Department of Energy (DOE)-approved energy audit tool.

Select which option used below.	
Separate H&S Budget ☑	Contained in Program Operations ☐

3.0 – H&S Expenditure Limits

Pursuant to 10 CFR 440.16(h), Grantees must establish H&S expenditure limits for their Program and provide justification for those limits by explaining the basis and related historical H&S expenditures. DOE acknowledges that it may be necessary for Grantees to deviate from historical expenditures when certain circumstances arise (e.g., funding source changes).

10 CFR 440.16(h)(2) dictates that these limits must be expressed as a percentage of the ACPU. To calculate this percentage, use the following formula:

$$Total\ Average\ H\&S\ Cost\ per\ Unit = \frac{H\&S\ budget\ amount}{Program\ Operations\ budget\ amount}$$

For example, if the ACPU is $5,000 and a Grantee's Program expends an average of $750 per dwelling on energy-related H&S measures, the Total Average H&S Cost per Unit would equal 15 percent. DOE acknowledges that this percentage may vary significantly between Grantees due to different geographical areas and depending upon the availability of other funding sources, resource availability, etc. Low percentages should include a statement of what other funding supports H&S costs, while larger percentages will require greater justification and relevant historical support.

15 percent is not a maximum limit on H&S expenditures. DOE will conduct a secondary level of review on H&S Plans with a Grantee request of more than 15 percent of Program Operations used for H&S purposes. ***DOE strongly encourages using the table below in developing justification for the requested H&S budget amount.*** *In accordance with 10 CFR 440.18(d)(15), these funds are to be expended by the Program in direct weatherization activities, "of which is necessary before, or because of, installation of weatherization materials." This same section of the regulation excludes the H&S costs from the ACPU limitation if H&S costs are budgeted separately.*

DOE recommends reviewing recent budget requests and compare those to actual H&S 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 annual plan.

H&S expenditure limits and justification explaining the basis for setting the limits.

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 that costs are 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 if the H&S measures cannot be installed. 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.

Utilizing the spreadsheet embedded below, provide a full list of H&S measures using historical data from your program, including average cost, and frequency rate. If installing more than a single instance of one measure in a unit (e.g. multiple CO alarms), Grantees may aggregate costs so that frequency does not exceed 100%, or enter a justification into the measure column, which explains why that measure has a frequency rate of over 100%. The spreadsheet will auto calculate your expected Total Average H&S Cost per Unit.

Instructions: Double-click icon directly below to open, view and edit Measure Matrix Spreadsheet. Complete the spreadsheet by entering the required information. To save, close the spreadsheet and it will save to this document.

Measure Matrix
Final.xlsx

4.0 – Incidental Repair Measures

Any measures that could potentially be identified as H&S, but the Grantee chooses to instead identify and treat those measures as incidental repair measures (IRMs), must be implemented consistently throughout the Grantee's weatherization program. The measure must fit the regulatory definition of an IRM and be cost justified along with the associated energy conservation measure and/or package of measures. 10 CFR 440.3 defines Incidental Repairs as, "those repairs necessary for the effective performance or preservation of weatherization materials."

H&S measures identified and treated as IRMs within your Program.

Incidental Repair Measures

Any measure referenced in conjunction as an Energy Conservation Measure will be considered an Incidental Repair Measure, otherwise they will be considered a Health and Safety Measure. Incidental Repairs means 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 with WPN 19-5, 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 – Occupant Pre-Existing or Potential Health Conditions and Hazard Identification and Notification Form(s)

Grantees must develop a written policy that includes, at a minimum, the following documentation relating to H&S Plan implementation and maintain signed copies in each client file. Each notification must include the occupant(s) (and landlord if applicable) name and address, be signed and dated by the occupant (and landlord if applicable) indicating that they understand and have been informed of their rights and options and signed by the Subgrantee personnel collecting the information.

Required topics are:

- ***Occupant Pre-existing or Potential Health Condition Screening***
  - *Provides documentation that allows occupant(s) to self-report known or suspected health concerns as part of initial application for weatherization, during the energy audit, or other part of the weatherization process as specified. Must minimally contain the following:*
    - *Any known risks associated with the measures and materials being installed*
    - *Subgrantee point of contact information for occupant(s)*
    - *Date of screening*
- ***Hazard Identification Notification***
  - *Provides documentation that the occupant and landlord (if applicable), have been informed of any potential hazards identified during the energy audit or intake process. Must minimally contain the following:*
    - *Date(s) of the energy audit/assessment and when the occupant(s) (and landlord, if applicable) was informed of a potential H&S issue*
    - *A clear description of the problem, including any testing results*
    - *A statement indicating if, or when weatherization could continue*

Radon Informed Consent Form

- *Provides documentation that the occupant(s) (and landlord if applicable) have been informed of any potential hazards associated with radon in weatherized dwellings. The form must minimally contain the following:*
  - *An explanation on the potential small risk of increasing radon levels when building tightness is improved. This is based on the results of the Buildings Assessment of Radon Reduction Interventions with Energy retrofits Expansion Study (The BEX Study)*
  - *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.*

Procedure for soliciting occupants' health and safety concerns related to components of their homes

Before each Energy Audit, the EA will present the Release of Liability and Waiver of Claims to the client. This document contains a summarized description of weatherization activities, particularly blown insulation, and notifies the client of potential risks that may be associated with such activities.

Procedure for determining whether occupants suffer from health conditions which may be negatively impacted by the act of weatherizing their dwelling

The Release of Liability and Waiver of Claims includes a list of health conditions prone to adverse effects of weatherization activities. This gives the client opportunity to identify their own health conditions within the list, or any similar health conditions that would likewise be affected by weatherization activities.

Procedure for addressing potential health concerns including pre-existing health conditions when they are identified

The document includes a recommendation that those clients who have health conditions which may be affected by weatherization activities leave the home for a period of time during and after weatherization activities are completed. The form

also contains agency contact information and suggests that clients may contact the agency with any questions.	
Location where forms have been uploaded/submitted	
Separate attachment to SF424 ☑	Separate attachment to H&S Plan ☐

6.0 – Health and Safety Categories

For each of the following H&S categories identified by DOE in the following tables, follow the directions below.

- Any section that is "Required" below must be explicitly detailed in the H&S Plan regardless of funding source used. If the Grantee checks the box for "Concurrence with DOE Guidance" the contents of the box may be left as it exists or reference the section/location within Grantee Policy and Procedure manual that contains language or insert Grantee specific language. If the "Alternative Guidance" box is checked, the Grantee must provide that alternative guidance in the box.
  - If a Grantee is proposing an alternative action/allowability for a "Required" item, the alternative requires comprehensive explanation of how it meets the intent of the DOE program notice.
  - If a "Required" item/category will not be addressed with any funding source and will always result in deferral, the H&S Plan must state that.
- Any section that is "Allowable" below must be detailed only if DOE WAP funds are used to implement the measures. If the Grantee uses DOE funds for any "Allowable" activities from the Table of Issues then they must be described here in detail, including defining "minor", "major", "limited", "case-by-case", and "at-risk" if the term is applied. If you only check the box "Allowed with Alternative Funds" then no additional information is required.
- Any section that is "Prohibited" below may not be addressed with DOE WAP H&S funds and does not need to be specifically addressed in the H&S Plan. The Grantee simply needs to check the "Concur with DOE guidance" box and indicate if the condition will result in deferral/referral.
- The Grantee H&S Plan may address additional H&S hazards specific to their program that are not included in the Table of Issues. If a Grantee chooses to include additional measures as DOE WAP funded H&S costs, the H&S Plan must include details pertaining to the measures allowed, testing required, and client education for these specific hazards.
- All required "Testing/Inspection" related items must be documented in the client file to verify completion and results.

6.1 – Air-Conditioning, Heating Systems, and Combustion Appliances

Required Actions		
Concur with DOE Guidance ☑	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☑	Alternative Funds ☑	

- Replace, repair, or install primary heating systems when existing primary heating systems are unsafe, inoperable, or nonexistent. No home may be left without a safe primary heating system after weatherization where climate conditions require heating (i.e., all climate zones except zone 1 as defined by ASHRAE). If unable to meet this requirement, deferral is required.

- No DOE-funded weatherization work is permitted if the completed dwelling unit will be heated with an unvented combustion space heater as the primary heat source. The primary heat source must be replaced with a vented unit prior to or by weatherization. The replacement unit must be sized to heat the entire dwelling unit.

- Unsafe secondary units, including space heaters, must be repaired, or removed and disposed of, or deferral is required. Secondary unvented space heaters are considered unsafe if they:
    - are not listed and labeled as meeting ANSI Z21.11.2;
    - have an input rating of more than 40,000 BTU/hour;
    - are in a bedroom and have an input rating of more than 10,000 BTU/hour;
    - are in a bathroom and have an input rating of more than 6,000 BTU/hour;
    - are operating in an unsafe manner (e.g., high carbon monoxide (CO) readings, too close to combustible materials, lack sufficient combustion air volume);
    - or are not permitted by the Authority Having Jurisdiction (AHJ).
- DOE WAP Grantees must comply with the Manufactured Home Construction and Safety Standards which mandates that:
    - All fuel-burning appliances in manufactured homes except: ranges, ovens, illuminating appliances, clothes dryers, solid fuel-burning fireplaces and solid fuel-burning stoves, must be installed to provide for the complete separation of the combustion system from the interior atmosphere of the manufactured home (i.e., to draw their combustion air from outside), and be vented to outside the dwelling.
    - All appliances installed by or left in place after weatherization in manufactured homes must meet these standards, including secondary heating sources. If an occupant will not allow the removal of an unsafe combustion appliance from the home, deferral is required.
    - Repair or replace combustion gas venting to ensure proper combustion gas venting to outside the dwelling for all combustion appliances, including but not limited to gas dryers and refrigerators, furnaces, vented space heaters, and water heaters.
- If weatherization installs an appliance that is vented into a masonry chimney, the chimney must be lined in compliance with the International Fuel Gas Code (IFGC) or local AHJ if more stringent.
- Install adequate combustion air for all combustion appliances left after weatherization.
- If permits are required for heating/cooling system work, they must be secured and are a program operation cost if the installation is an ECM or may be included in the H&S cost if installed as a H&S measure.
- If unsafe conditions relating to existing combustion appliances require remediation to safely perform weatherization and cannot be remedied by repair or tuning, replacement is an allowable H&S measure unless prevented by other guidance herein.
- Documentation justifying the replacement with a cost comparison between replacement and repair must be maintained in the client file.

Allowable Actions	
Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds ☑

- Replace, repair, or install primary air conditioning in homes where current occupants are at-risk
  - Client has a medical condition requiring temperature control as confirmed by a healthcare provider
  - Documentation from a healthcare provider would be maintained by the agency supporting that air conditioning is required for the health & safety of the clients
- Minor repairs, defined as repairs up to $500, on electric space heaters are allowable.
- Repair or removal of primary and secondary solid fuel heating appliances.
- Replacement of unsafe primary solid fuel heating appliances.

Prohibited Actions

Concur with DOE Guidance ☑

Using DOE WAP H&S funds for replacement or installation of secondary heat sources is prohibited.

Required Testing/Inspection

Concur with DOE Guidance ☑	Alternative Guidance ☐

- Verify that primary heating systems are present, operable, and performing correctly.
- Conduct combustion appliance testing and visual inspection of all combustion appliances and their related venting.
- Depressurization and spillage testing is required for all Category 1 appliances pre- and post-weatherization and before leaving the home on any day when work has been done that could affect draft (e.g., air or duct sealing, adding exhaust ventilation).
- CO testing is required for all combustion appliances, regardless of venting type.
- Verify proper clearances for all combustion venting types
- Visually inspect the entirety of solid fuel-fired appliance installations (e.g., wood stoves, coal stoves, pellet stoves, fireplaces) including the venting system to ensure it adheres to the applicable code or local authority having jurisdiction. Appliances must be inspected pre- and post-weatherization.
- Conduct pre- and post- weatherization worst case CAZ depressurization testing in spaces having a fireplace or woodstove. Since there is no consensus method for verifying safe operation of fireplaces and woodstoves, Grantees can propose testing policies and limits. If the Grantee does not propose a policy and fireplaces or woodstoves are left operational, the vent must meet national or local codes, or the home cannot be weatherized.
- Safety inspections related to space heaters, fireplaces, and woodstoves must include, but not be limited to, verification of adequate floor protection, and code-compliant clearances to walls and other combustible materials.

Grantee Combustion Testing Action Levels

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
• 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.	• 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.	• 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.

Grantee Woodstove & Fireplace inspection/testing policy including actions/limits

Concur with DOE Guidance ☑	Alternative Guidance ☐

Fireplace or woodstove venting that is left operational after weatherization must meet Michigan Mechanical Code and NFPA 211 or the home must be deferred.

Required Occupant Education

Concur with DOE Guidance ☑	Alternative Guidance ☐

- Appropriate use and maintenance of units.
- Provide all paperwork and manuals for any equipment installed by weatherization.
- 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 combustion safety and hazards information including how to recognize depressurization, dangers of CO poisoning, and fire risks associated with combustion appliance use.
- When an unsafe condition exists, issue appropriately filled out Hazard Identification & Notification form

6.2 – Asbestos (Confirmed and/or Presumed Asbestos Containing Material)

Required Actions

Concur with DOE Guidance ☑	Alternative Guidance ☐	Results in Deferral/Referral ☐

DOE WAP H&S Funds ☑	Alternative Funds ☑

- When suspected friable Asbestos Containing Materials (ACM) are present, including vermiculite, assume they contain asbestos and take precautionary measures to prevent disturbing it during the audit and work unless testing determines otherwise.
- Grantees must have written policy included in their H&S plan for:
  - Identifying and managing suspected ACM that provides for reasonable and necessary precautions to prevent asbestos contamination in the home.
  - Addressing blower door testing where suspected friable ACM is present (as defined by EPA), including vermiculite.

Grantee ACM policy

"Friable" means the material can be crumbled, pulverized, or reduced to powder by the pressure of an ordinary human hand.

When friable Presumed Asbestos Containing Material (PACM) is identified, in the home, it must be treated as though it contains asbestos until proven otherwise. The blower door shall not be run and the Weatherization work shall not proceed until the PACM is proven to not contain asbestos, encapsulated or abated in one of the allowable ways included in this guidance or by an outside funding source.

Grantee Blower Door Testing Policy When Suspected ACM Exists

When friable PACM is identified, in the home, the blower door test will not be conducted to avoid disturbing friable PACM particles and the work will be deferred until all friable PACMs have either been tested and confirmed to not be ACM or safely removed and disposed of by an authorized agency. In cases where a home was deferred due to PACM and then later approached for weatherization, the client must provide documentation that the PACM was tested and confirmed to not be an ACM by a certified tester or 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).

Allowable Actions

Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds ☑

- Temporary removal and reinstallation of ACM siding to perform an ECM (e.g., wall insulation).
- Limited encapsulation, defined as costs up to $750, or removal of suspected ACM on small surfaces (pipes, ductwork, furnaces, other small, covered surfaces, etc.) by an appropriately trained asbestos control professional if necessary to safely weatherize the dwelling as defined by the Grantee's H&S Plan.

Prohibited Actions

Concur with DOE Guidance ☑

Using DOE WAP H&S funds for general abatement/removal/or replacement of asbestos siding, thermal system insulation (TSI) or Transite, or vermiculite is prohibited.

Required Testing/Inspection

Concur with DOE Guidance ☑	Alternative Guidance ☐	Results in Deferral/Referral ☐

DOE WAP H&S Funds ☑	Alternative Funds ☑

- Visually inspect all surfaces (i.e., walls, floors, ceilings, roofs) for suspected ACM prior to drilling or cutting.
- Assume asbestos is present in suspect materials unless testing reveals otherwise.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds ☑

- Sample collection and testing of suspected ACM conducted by an Asbestos Hazard Emergency Response Act of 1986 (AHERA) certified tester.
- Baseline indoor environmental asbestos sampling.
- 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.

Required Occupant Education	
Concur with DOE Guidance ☑	Alternative Guidance ☐

- Formally notify the occupant, and landlord if applicable, in writing:
  - of suspected ACMs that are present and what precautions will be taken to ensure the occupants' and workers' safety during weatherization;
  - of results if testing was performed;
  - not to disturb suspected ACM;
  - When deferral is necessary due to asbestos, occupant, or landlord if applicable, must provide documentation that a certified professional performed the remediation before work continues.

6.3 – Biologicals and Unsanitary Conditions

Required Actions		
Concur with DOE Guidance ☑	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☑	Alternative Funds ☑	

Deferral where conditions (odors, bacteria, raw sewage, rotting wood, etc.) in the home pose a health risk to occupants and/or weatherization workers or may be worsened by weatherization activities (e.g., air sealing) and will not be resolved by weatherization.

Allowed Actions	
Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds ☑

- Limited remediation of conditions, defined as costs up to $500, that may lead to or promote biological concerns and unsanitary conditions (e.g., repairing leaking sewage pipe).
- Limited cleaning, defined as costs up to $500, of the workspace to protect the health and safety of workers and occupants.

Required Testing/Inspection		
Concur with DOE Guidance ☑	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☑	Alternative Funds ☑	

Sensory inspection of interior, exterior, attics, and subspaces of the dwelling.

Prohibited Testing/Inspection
Concur with DOE Guidance ☑

DOE WAP H&S funds may not be used for testing of materials for biological contaminants.

Required Occupant Education	
Concur with DOE Guidance ☑	Alternative Guidance ☐

Inform occupant in writing of observed biological and unsanitary conditions.

6.4 – Building Structure and Roofing (e.g., roofing, wall, foundation)

Allowable Actions	
Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds ☐

- Minor repairs to building structure or roofs, defined by costs up to $750, are allowed.

Prohibited Actions
Concur with DOE Guidance ☑

Using DOE WAP H&S funds for ***major*** repairs as defined by Grantee's H&S Plan. Using DOE WAP H&S funds for building rehabilitation is prohibited		
Define "major" repairs		
Repairs that cost over $750. These are unallowable in the DOE H&S category.		
Required Testing/Inspection		
Concur with DOE Guidance ☑	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☑	Alternative Funds ☑	
Visual inspection of building structure and roofing for damages that compromise building durability and to verify that portions of the home where weatherization will occur are safe for entry and performance of assessments, work, and inspections.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds ☑	
Diagnostics such as material moisture content, or relative humidity measurements at the audit and/or final inspection..		
Prohibited Testing/Inspection		
Concur with DOE Guidance ☑		
Using DOE WAP H&S funds for any testing/evaluation of structural materials by a third-party is prohibited.		
Required Occupant Education		
Concur with DOE Guidance ☑	Alternative Guidance ☐	
Notify occupant in writing of structurally compromised areas.		

6.5 – Code Compliance		
Allowable Actions		
Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds ☑	
Correction of preexisting code compliance issues triggered by weatherization measures being installed in a specific room or area of the home. If the installation of a weatherization measure triggers the correction of a preexisting code compliance issue, and is paid for with WAP funds, the specific code requirements with reference to the weatherization measure(s) that triggered the code compliance issue must be documented in the occupant file.		
Prohibited Actions		
Concur with DOE Guidance ☑		
• Using DOE WAP H&S funds for correction of preexisting code compliance issues not directly related to the installation of specific weatherization measures in the home is prohibited. • Using DOE WAP funds for work on condemned properties and properties where H&S conditions exist that cannot be corrected under this guidance is prohibited		
Required Testing/Inspection		
Concur with DOE Guidance ☑	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☑	Alternative Funds ☑	
Visual inspection.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds ☑	
If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.		
Required Occupant Education		
Concur with DOE Guidance ☑	Alternative Guidance ☐	
Inform occupant in writing of observed code compliance issues when it results in a deferral.		

6.6 – Electrical		
Required Actions		
Concur with DOE Guidance ☑	Alternative Guidance ☐	Results in Deferral/Referral ☐

DOE WAP H&S Funds ☑	Alternative Funds ☑
Provide sufficient over-current protection and damming prior to insulating building components containing knob and tube wiring, as required by the AHJ.	
Allowable Actions	
Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds ☑
• Minor electrical repairs (e.g., junction box covers, improper splices), defined as costs up to $750, to protect the occupant or workers from electrical hazards within the living area or in the immediate area where weatherization activities will occur are allowable. • 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. Costs associated with the licensed electrician inspections, for this reason, are allowable.	
Prohibited Actions	
Concur with DOE Guidance ☑	
Using DOE WAP H&S funds for ***major*** electrical repairs as defined by the Grantee's H&S plan is prohibited	
Define "major" repairs	
Electrical costs above $750. These are unallowable in the DOE H&S category.	

Required Testing/Inspection		
Concur with DOE Guidance ☑	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☑	Alternative Funds ☑	
• Visual inspection for presence and condition of knob-and-tube wiring. • Evaluate knob-and-tube wiring for safety prior to work. • Check for alterations that may create an electrical hazard.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds ☑	
Voltage drop and voltage detection testing is allowable		
Required Occupant Education		
Concur with DOE Guidance ☑	Alternative Guidance ☐	
• Provide occupant with written documentation of any electrical hazards identified that will not be addressed by weatherization • Provide information to occupant on over-current protection, overloading circuits, and basic electrical safety/risks if conditions warrant.		

6.7 – Fuel Leaks

Required Actions		
Concur with DOE Guidance ☑	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☑	Alternative Funds ☑	
• When a gas leak is found on the utility side of service, the utility service must be contacted, work must be temporarily halted, and the leak must be repaired before work may proceed. • Fuel leaks that are the responsibility of the occupant (vs. the utility) must be repaired before installing weatherization measures in the home.		
Allowable Actions		
Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds ☐	
• Replacement or repair of leaking bulk fuel tanks and/or lines if connected systems will remain after weatherization. • Replacement of flexible appliance gas connectors that are not compliant with current fuel gas codes.		

Prohibited Actions		
Concur with DOE Guidance ☑		
• Using DOE WAP H&S funds to repair leaks that are the responsibility of the utility to correct is prohibited. • Using DOE WAP H&S funds for environmental cleanup resulting from bulk fuel leaks is prohibited		
Required Testing/Inspection		
Concur with DOE Guidance ☑	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☑	Alternative Funds ☑	
• Test all exposed gas lines, fittings, valves, and connections for fuel leaks from utility connection to the appliance throughout the home. • Test all gas appliances for fuel leaks at all connections, valves, fittings, and burners. • Conduct sensory inspection of all bulk fuels lines and storage tanks to determine if leaks exist.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds ☑	
If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.		
Prohibited Testing/Inspection		
Concur with DOE Guidance ☑		
Using DOE WAP H&S funds for environmental testing of soil or water is prohibited.		
Required Occupant Education		
Concur with DOE Guidance ☑	Alternative Guidance ☐	
Inform occupants in writing of fuel leak testing results, including specific location if fuel leaks are detected.		

6.8 – Gas Ovens/Stovetops/Ranges		
Allowable Actions		
Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds ☑	
• Limited cleaning or repair, defined as costs up to $500, of ovens/ranges/stovetops are allowable.		
Prohibited Actions		
Concur with DOE Guidance ☑		
Using DOE WAP H&S funds for replacement of gas ovens/ranges/stovetops is prohibited.		
Required Testing/Inspection		
Concur with DOE Guidance ☑	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☐	Alternative Funds ☑	
• Test gas ovens for CO. • Grantee H&S plan must define action levels and resulting actions. • Visually inspect cooking burners and ovens for operability and flame quality.		
Define action levels for oven CO testing and resulting actions		
All work shall be deferred when the CO reading for the gas oven exceeds 225 ppm as measured or any of the range top burners exceed 100 ppm as measured. Alternative (LIHEAP) funds may be used to address ovens and burners with these readings.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds ☑	
If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.		
Required Occupant Education		
Concur with DOE Guidance ☑	Alternative Guidance ☐	
Inform occupants of the importance of using exhaust ventilation when cooking and the importance of keeping burners and broilers clean to limit the production of CO.		

6.9 – Hazardous Materials

Required Actions

Concur with DOE Guidance ☑	Alternative Guidance ☐	Results in Deferral/Referral ☐

DOE WAP H&S Funds ☑	Alternative Funds ☑

- Hazardous Waste Materials generated by weatherization work (e.g., refrigerant, asbestos, lead, mercury, CFL lighting bulb/ballasts, etc.) must be disposed of according to all local and federal laws, regulations, and guidelines, as applicable. Costs specifically related to disposal may be charged as a H&S expense.
- Subgrantees must document disposal requirements in contract language with the responsible party.
- ***Limited*** removal of pollutants that pose a risk to workers is required (e.g., flammable liquids, hazardous chemicals, and other air pollutants) as defined the Grantee's H&S Plan.
- If removal cannot be performed or is not allowed by the occupant, the unit must be deferred.
-

Define "limited" removal of pollutants

Defined as costs up to $500

Allowable Actions

Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds ☐

Limited removal of pollutants, defined as costs up to $500, that pose a risk to the occupant are allowable.

Prohibited Actions

Concur with DOE Guidance ☑

Using DOE WAP H&S funds for Lead, Asbestos, and Radon abatement is prohibited.

Required Testing/Inspection

Concur with DOE Guidance ☑	Alternative Guidance ☐	Results in Deferral/Referral ☐

DOE WAP H&S Funds ☑	Alternative Funds ☑

Sensory inspection.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds ☑

Sample gas draw detection and monitoring for toxics.

Prohibited Testing/Inspection

Concur with DOE Guidance ☑

Using DOE WAP H&S funds for any testing for hazardous materials other than that specifically permitted in the asbestos, lead, and radon sections of this document is prohibited.

Required Occupant Education	
Concur with DOE Guidance ☑	Alternative Guidance ☐
• Inform occupant in writing of hazards associated with hazardous waste materials being generated/handled in the home. • Inform occupant in writing of observed hazardous condition and associated risks. • Provide occupant written materials on safety issues and proper disposal of household pollutants. •	

6.10 - Injury Prevention of Occupants		
Allowable Actions		
Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds ☐	
Minor repairs and installations, defined as costs up to $500, (e.g., repairing stairs, replacing handrails, etc.) are allowable.		
Prohibited Actions		
Concur with DOE Guidance ☑		
Using DOE WAP H&S funds for ***major*** repairs, as defined by the Grantee's H&S Plan is prohibited		
Define "major" repairs		
Repairs with costs above $500. These are unallowable in the DOE H&S category.		
Required Testing/Inspection		
Concur with DOE Guidance ☑	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☑	Alternative Funds ☑	
Visually inspect for dangers that would prevent weatherization.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds ☑	
If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.		
Required Occupant Education		
Concur with DOE Guidance ☑	Alternative Guidance ☐	
If identified hazardous conditions will not be corrected during weatherization, inform occupant in writing of observed hazards and associated risks utilizing the "Hazard Identification Notification Form" required by WPN 22-7.		

6.11 – Lead-Based Surface Coverings (Paint, Varnishes, Roofing, etc.)

Required Actions

Concur with DOE Guidance ☑	Alternative Guidance ☐	Results in Deferral/Referral ☐

DOE WAP H&S Funds ☑	Alternative Funds ☑

- Subgrantees must comply with EPA's Lead; Renovation, Repair and Painting Program (RRP) rules when working in pre-1978 housing unless testing confirms the work area to be lead free. This includes, but is not limited to:
  - Client file documentation including the Certified Renovator's 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.
  - Certification and training requirements of the RRP rule.
  - Job site set up and cleaning verification by a Certified Renovator.
- Only those costs directly associated with lead safe work practices for surfaces directly disturbed during weatherization activities are allowable WAP H&S expenses.

Allowable Actions

Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐

If DOE WAP H&S Funds are used for any "allowable" actions, detail them here.

Prohibited Actions

Concur with DOE Guidance ☑

- Using DOE WAP H&S funds for lead abatement is prohibited.
- Using DOE WAP H&S funds for purchase, resourcing, or maintenance of X-ray Fluorescence (XRF) devices is prohibited.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds ☑

- Testing to determine the presence of lead on surfaces that will be disturbed by WAP measure installation is allowed with EPA-approved testing methods.
- Alternatively, if EPA-approved testing is not conducted, the Subgrantee must assume lead is present in pre-1978 homes and work in compliance with EPA RRP rules.

Required Occupant Education

Concur with DOE Guidance ☑	Alternative Guidance ☐

Follow pre-renovation education requirements per EPA RRP rules.

6.12 – Mold and Moisture

Allowable Actions

Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds ☑

- Limited water damage repairs, defined as costs up to $500, that can be addressed by weatherization workers are allowed when necessary to weatherize the home and to ensure the long-term stability and durability of the measures are allowable.
- Source control (i.e., correction of moisture and mold creating conditions) when necessary, 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. Source control includes, but is not limited to site drainage, gutters, down spouts, extensions, flashing, sump pumps, dehumidifiers, landscape, leaking roofs, vapor retarders, moisture barriers, etc.
- Window and door repairs are allowed with H&S funds to resolve a bulk water intrusion issue that is the cause of visible biological growth and in compliance with the most current program notice (WPN 19-5 at the time of this guidance).

Prohibited Actions

Concur with DOE Guidance ☑

- Using DOE WAP H&S funds for mold cleanup is prohibited.
- Using DOE WAP H&S funds for window and door replacements is prohibited

Required Testing/Inspection		
Concur with DOE Guidance ☑	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☑	Alternative Funds ☑	
Visual assessment for moisture or mold damage including exterior drainage.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds ☑	
• Diagnostics such as material moisture content, or relative humidity measurements at the audit and/or final inspection.		
Prohibited Testing/Inspection		
Concur with DOE Guidance ☑		
Using DOE WAP H&S funds for mold testing of any type is prohibited.		
Required Occupant Education		
Concur with DOE Guidance ☑	Alternative Guidance ☐	
Provide occupant written notification of identified mold/moisture hazards and information regarding the associated hazard.		

6.13 - Occupant Pre-existing or Potential Health Conditions

Required Actions		
Concur with DOE Guidance ☑	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☑	Alternative Funds ☑	
• When a person's health may be at risk and/or WAP work activities could constitute an H&S hazard, the occupant is required to take appropriate action based on severity of risk. • Deferral, if occupant risk cannot be mitigated.		
Allowable Actions		
Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds ☑	
• Occupant temporary relocation costs on a case-by-case basis. • In a life-threatening emergency situation, where relocation is mandatory, the agency must follow all emergency procedure steps as defined in Section 1.0 of this Health and Safety Plan. BCAEO will assess the situation and if determined to be potentially life-threatening, approval of relocation costs will be approved, and notification sent to the agency. • Instances could include but are not limited to, fuel leaks, CO, loss of heating system at times of unsafe weather. Hotel, meals, and transportation costs in alignment with state travel policy and rates. Timeframe for duration of relocation must be approved by BCAEO on a case by case basis.		
Required Testing/Inspection		
Concur with DOE Guidance ☑	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☑	Alternative Funds ☑	
• Screen occupants for known or suspected health concerns either as part of initial application for weatherization, during the audit, or both. • This is done utilizing the "Occupant Pre-existing or Potential Health Condition Screening Form" required by WPN 22-7.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐	
If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.		
Required Occupant Education		
Concur with DOE Guidance ☑	Alternative Guidance ☐	
• Inform occupant in writing of any known risks and provide pre-weatherization screening form. • Provide occupant with Subgrantee point of contact information in writing.		

6.14 – Pests		
Required Actions		
Concur with DOE Guidance ☑	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☑	Alternative Funds ☑	
Deferral of homes where infestation of pests cannot be reasonably removed or poses H&S concern for workers.		
Allowable Actions		
Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds ☑	
• Limited pest removal, defined as costs up to $750, is allowed only where infestation would prevent weatherization. • Screening of windows and points of access and incorporating pest exclusion into air sealing practices to prevent intrusion.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds ☑	
Sensory inspection of presence and degree of infestation and risk to worker.		
Required Occupant Education		
Concur with DOE Guidance ☑	Alternative Guidance ☐	
Inform occupant in writing of observed conditions and associated risks.		

6.15 – Radon		
Required Actions		
Concur with DOE Guidance ☑	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☑	Alternative Funds ☐	
• Cover exposed dirt floors within the pressure/thermal boundary with a sealed soil gas retarder • Cover sump well/pits with airtight covers • Implement ventilation as required by ASHRAE 62.2-2016		
Allowable Actions		
Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐	
• In homes where radon may be present, work scope may include additional precautionary measures based on EPA Healthy Indoor Environment Protocols for Home Energy Upgrades.		
Prohibited Actions		
Concur with DOE Guidance ☑		
Using DOE WAP H&S funds for radon mitigation is prohibited.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds ☑	
Limited radon testing, defined as costs under $500, is allowable.		
Required Occupant Education		
Concur with DOE Guidance ☑	Alternative Guidance ☐	
• Provide all occupants EPA's A Citizen's Guide to Radon and inform them of radon related risks. • Occupants must sign an informed consent form prior to receiving weatherization services.		

6.16 – Safety Devices: Smoke and Carbon Monoxide Alarms, Fire Extinguishers		
Required Actions		
Concur with DOE Guidance ☑	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☑	Alternative Funds ☑	
Install CO alarms in every home where alarms are not present or are inoperable in compliance with ASHRAE 62.2-2016 which references NFPA 720 (note: NFPA 720 has been incorporated into NFPA 72).		
Allowable Actions		
Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds ☑	
• Install smoke alarms where the AHJ requires them if alarms are not present or are inoperable. • Replace functional smoke alarms and carbon monoxide alarms if they are beyond the manufacturer's stated lifetime (usually 10 years). • Replace functional smoke or CO alarms batteries if designed to be replaceable. • Provide fire extinguishers where solid fuel burning equipment is present.		
Prohibited Actions		
Concur with DOE Guidance ☑		
Using DOE WAP H&S funds for replacement of functional smoke or CO alarms that are not beyond the manufacturer's stated lifetime is prohibited.		
Required Testing/Inspection		
Concur with DOE Guidance ☑	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☑	Alternative Funds ☑	
Verify operation and age of installed alarms.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐	
If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.		
Required Occupant Education		
Concur with DOE Guidance ☑	Alternative Guidance ☐	
Provide occupant with verbal and written information on use of newly installed devices and the potential risks of not properly maintaining these devices.		

6.17 – Ventilation and Indoor Air Quality		
Required Actions		
Concur with DOE Guidance ☑	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☑	Alternative Funds ☐	
Install ventilation as required by ASHRAE 62.2 - 2016. If occupant refuses ventilation as required by ASHRAE 62.2, the home must be deferred.		
Allowable Actions		
Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐	
If DOE WAP H&S Funds are used for any "allowable" actions, detail them here.		
Required Testing/Inspection		
Concur with DOE Guidance ☑	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☑	Alternative Funds ☑	
• ASHRAE 62.2 evaluation to determine required post-weatherization ventilation. • Measure fan flow of existing fans and of installed equipment to verify performance.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐	
Use of anemometer is allowed if method for arriving at measurement use for ASHRAE compliance in included..		
Required Occupant Education		

Concur with DOE Guidance ☑	Alternative Guidance ☐

- Provide occupant with information on function, use, and maintenance (including location of service switch and cleaning instructions) of ventilation system and components.
- Provide occupant with equipment manuals for installed equipment.
- Include disclaimer that ASHRAE 62.2 does not account for high polluting sources or guarantee indoor air quality.

6.18 – Water Heaters

(see Combustion Appliances for combustion related requirements)

Allowable Actions

Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds ☐

- Minor safety repairs of water heaters, up to $500, (e.g., T&P valve piping, backflow prevention devices, expansion tanks) as defined by the Grantee's H&S plan.
- Replace, repair, or install primary water heaters when existing primary water heater is unsafe, inoperable, or nonexistent.
  - Examples of this include, but are not limited to, if the water heater fails CAZ testing, if combustion air is inadequate and cannot be introduced effectively, leaking primary tank, high CO measurements.
  - If pre-weatherization CAZ testing and target air sealing numbers indicate the water heater will fail future worst case CAZ testing, replacement is warranted.

Required Testing/Inspection

Concur with DOE Guidance ☑	Alternative Guidance ☐	Results in Deferral/Referral ☐

DOE WAP H&S Funds ☑	Alternative Funds ☑

- Visual inspection of all water heaters and related piping for safety and leaks
- See Combustion Appliances section for related combustion safety testing requirements.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐

Temperature settings testing is allowable.

Required Occupant Education

Concur with DOE Guidance ☑	Alternative Guidance ☐

- Appropriate use and maintenance of units.
- Provide all paperwork and manuals for any installed equipment.
- Where combustion equipment is present, provide combustion safety and hazards information including how to recognize depressurization, dangers of CO poisoning, and fire risks associated with combustion appliance use.

6.19 – Worker Safety

Required Actions

Concur with DOE Guidance ☑	Alternative Guidance ☐	Results in Deferral/Referral ☐

DOE WAP H&S Funds ☑	Alternative Funds ☑

Adherence to all federal, state, and local worker safety regulations (e.g., OSHA, EPA).

Allowable Actions

Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds ☑

- Minor repairs and installations, up to $250, (e.g., repairing stairs, replacing handrails, etc.) as defined by the Grantee's H&S Plan, are allowable when necessary to safely weatherize the dwelling.
- Equipment purchases to protect the health and safety of the worker (e.g., Personal Protective Equipment (PPE), jobsite cleaning supplies)

Prohibited Actions

Concur with DOE Guidance ☑

Using DOE WAP H&S funds for ***major*** repairs as defined by the Grantee's H&S Plan is prohibited.	
Define "major" repairs	
Any costs over $250.	
Allowable Testing	
Allowed with DOE WAP H&S Funds ☑	Allowed with Alternative Funds ☐
• Environmental and surveillance testing required by OSHA regulation	

6.X – (Insert Additional H&S Items for Use of DOE WAP H&S funds)		
Required Actions		
Concur with DOE Guidance ☐	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☐	Alternative Funds ☐	
Insert required item text		
Allowable Actions		
Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐	
If DOE WAP H&S Funds are used for any "allowable" actions, detail them here.		
Prohibited Actions		
Concur with DOE Guidance ☐		
What is prohibited		
Required Testing/Inspection		
Concur with DOE Guidance ☐	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☐	Alternative Funds ☐	
Insert required item text		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐	
If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.		
Prohibited Testing/Inspection		
Concur with DOE Guidance ☐		
What is prohibited		
Required Occupant Education		
Concur with DOE Guidance ☐	Alternative Guidance ☐	
Insert required item text		

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.

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

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

CONTRACTOR:

_____ _____

Signature Date

Printed Name:

AGENCY NAME

_____ _____

Signature Date

Printed Name:

Title:

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

TRAINING AND TECHNICAL ASSISTANCE (T&TA) PLAN TEMPLATE

1.0 – GENERAL INFORMATION

COMMENTS THAT DO NOT GENERALLY FIT INTO THE AVAILABLE TABLES BELOW

Training and Technical Assistance activities (T&TA) for both Subgrantee and MDHHS-BCAEO WAP staff are instrumental in the provision of weatherization services to low-income households in Michigan. All MDHHS-BCAEO and MiTEC training and technical assistance activities will have at least one of the following objectives:

- Provide every client the highest quality of work specified by the comprehensive energy audit
- Maintain and increase the efficiency, quality, and effectiveness of the WAP at all levels
- Maximize energy savings within Michigan's WAP
- Minimize production costs
- Ensure the Health and Safety of low-income households and WAP workers
- Increase the effectiveness of client education
- Improve the quality of weatherization work performed on dwellings
- Improve program management and administrative procedures within Michigan's WAP
- Reduce the potential for waste, fraud, abuse, and mismanagement

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- Ensure the Health and Safety of low-income households and WAP workers
- Increase the effectiveness of client education
- Improve the quality of weatherization work performed on dwellings
- Improve program management and administrative procedures within Michigan's WAP
- Reduce the potential for waste, fraud, abuse, and mismanagement

Additional training will be recommended or mandated as necessary based upon DOE monitoring results, MDHHS-BCAEO monitoring results, single-audit findings, STAR Assessment, WAP Network data analysis results, and feedback provided from the entities listed below.

MDHHS-BCAEO participates in the following:

- Policy Advisory Committee
- MDHHS-BCAEO technical monitoring staff and reports
- State Plan preparation meetings
- Michigan Weatherization Leadership Committee
- Requests from Michigan's WAP Network
- MiTEC Training Board

Training class evaluations and feedback:

- Compliance with WPN 22-4, and all other applicable DOE Program Guidance
- Federal and state auditors and/or reports

MDHHS-BCAEO continues to engage with the network using the following methods:

- Active involvement with Policy Advisory Council in Michigan
- Monthly Weatherization Manager Updates
- Monthly Weatherization meetings for Executive Directors
- Scheduling statewide weatherization meetings
- Updates to program management guidance
- Updates/revisions and implementation of the CSPM Policies and Procedures Manual
- Continued meeting of the working group consisting of MDHHS-BCAEO Weatherization Staff, to develop new training approaches and refine the existing courses to best meet the needs of the network

Encouragement of information exchange and skills transfer among subgrantees on an informal basis

2.0 – OVERALL T&TA PLAN

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

FEEDBACK FROM INTERNAL AND EXTERNAL REVIEWS, EXAMPLES INCLUDE:

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

Training and Technical Assistance Assessment:

MDHHS-BCAEO staff analyzes financial, production, and weatherization retrofit information on a monthly and quarterly basis. Trends indicating an inability to meet goals such as in production and/or completed weatherization measures will be documented and tracked for appropriate follow up. The monitoring reports are shared with the MiTEC so trainings can be modified or customized based on needs. Onsite visits provide observable evidence for the next level of training and technical assistance needed to improve performance and quality of work.

MDHHS-BCAEO updates and implements policy to ensure compliance with the weatherization assistance program specifically in weatherization technical training for consistent and effective work. The Learning Management System (LMS) is a database with a master list of all weatherization professional students and their associated training records. Reporting and data analysis of the records are being developed to identify the needs of the individuals and the weatherization network working within the program.

Feedback Summary that influenced the PY 2022 Training Plan:

Feedback from Department of Energy (DOE) Project Officer (PO) Monitoring Visits:

- Michigan's WAP received on-site monitoring from DOE during PY 2019. In response to the issues discovered during this monitoring visit, the MDHHS-BCAEO is requiring that all WAP Energy Auditors, and QCIs, take CAZ, ASHRAE 62.2 and Mobile Home Weatherization training during PY 2020. MDHHS-BCAEO is requiring that all Crew Leaders and Retrofit Installers/Technicians take Mobile Home training in PY2020. MDHHS-BCAEO extended the required training into PY 2021 due to delays in the COVID 19 pandemic. This required training was to ensure that all of Michigan's WAP workforce understands proper duct pan testing and duct sealing, ASHRAE calculations and proper use of calculation forms, and proper CAZ testing for all conditions for those performing the work in client homes. MDHHS-BCAEO will review agencies' compliance with these training requirements in PY22.

- MDHHS-BCAEO will assess agencies success in achieving the required

American Customer Satisfaction Index Survey Results:

- MDHHS-BCAEO has dedicated time and effort to improve performance in the category of Training Provided by Third Parties. When this survey was conducted, MDHHS-BCAEO was in the early stages in planning to develop a Weatherization Training Center. As of July 14, 2020, MDHHS-BCAEO has established an IREC accredited training center. In PY22, MiTEC will continue to hold a robust training program to ensure weatherization professionals are able to apply the building science around weatherization. MiTEC is also working towards improving access to training by holding training classes throughout the state. This will also reduce costs for agencies and contractors. The comments below that helped MDHHS-BCAEO establish a mobile training.
    - "Out of state is often expensive and hard to get."
    - "More locations throughout the state"
    - "Have more options in trainers at facilities that may be closer to our state."
    - "Easier access to training's, and more choices on when available"
- The following comment is helpful for MDHHS-BCAEO to build consistency in the program. The field guide update and the new energy auditor manual was completed in PY20 with a consistency lens.
    - "During conferences and technical monitoring, that a consistent message is being relayed to the sub-grantees. There have been some staff turnover recently, and the message isn't always consistent from one technical staff person to the next. If we are to follow the state plan and the SWS with the Field Guide as working tools, then everyone should be getting the same clear message from the state down to the contractors."
    - "Have one common set of regulations and apply them consistently."

Weatherization Meetings with Executive Directors, Weatherization Managers and the Weatherization Leadership group throughout the year have led to the following:

Michigan WAP Network Expansion Planning:

The MDHHS-BCAEO is actively working with Michigan's WAP Network on workforce development and expansion. In PY21, MDHHS-BCAEO built and rolled out a performance based module framework for the Retrofit Installer Technician JTA as an option to fulfill comprehensive training requirements. MDHHS-BCAEO has also collaborated with other statewide stakeholders to better understand contractors' perspective on the WAP through a contractor survey. The survey was conducted in PY21 and received over 100 responses from internal and external contractors to our WAP. In PY21MDHHS-BCAEO increased the base T&TA amount passed on to subgrantees as a plan to allow them to recruit and train additional staff for program expansion. MDHHS-BCAEO hired an additional Weatherization Coordinator to pursue technical competencies in order to become a Quality Control Inspector for the expanded program. MDHHS-BCAEO has also begun the framework of a marketing campaign targeting the following groups: General public; potential clients; potential contractors; and individuals for a pipeline into workforce development. In PY22, MDHHS-BCAEO will broaden this marketing campaign including youtube videos, advertisements, an updated website, event outreach and partnerships for workforce development.

Michigan Weatherization Assistance Program Home Energy Professionals Statewide Program:
MDHHS-BCAEO will implement a statewide home energy professionals' program that will expand the number of energy auditors, quality control inspectors, crew leaders, and other home energy professionals for both single family dwellings and multifamily jobs. The program will create a pathway for individuals that are interested in the field to have an opportunity to be trained and work with seasoned energy auditors, quality control inspectors, and crew leader mentors.

New statewide home energy professionals will be part of an apprentice program before becoming a member of the statewide program. Seasoned energy auditors, quality control inspectors, crew leaders, and other home energy professionals must apply and be awarded a 3-year membership into the statewide program.

Benefits of the program will include:

- Opportunity to accept jobs from all community action agencies operating the weatherization assistance program
- Function independently or part of statewide team
- Statewide professional recognition
- Allowed to post, print, and share Michigan Weatherization Assistance logo on contractor's marketing material
- Assist in building consistency across the WAP network
- Trained on mentoring and coaching new home energy professionals
- Trained on analyzing energy efficiency for contracted jobs
- Assist in analyzing all contracted jobs for high energy savings
- Acknowledged for being responsible for high energy savings
- Additional compensation for working on a statewide defined job, providing mentoring/coaching to new professionals in the field, and submitting training and technical assistance report analysis

EXISTING OR PLANNED ACCREDITED TRAINING CENTER PARTNERSHIP OR WORKING RELATIONSHIP.

Michigan Training and Education Center (MiTEC)

MiTEC continues to be a fully operational Weatherization Training Center and carries the responsibility for properly training Michigan's WAP network of providers and technicians.

MiTEC has been established as a state entity. Staff for MiTEC are hired through the Michigan Public Health Institute (MPHI) to function as State of Michigan affiliate staff under the direction of MDHHS-BCAEO in accordance with a contract between the MPHI and the Michigan Department of Health and Human Services (MDHHS). Federal and state procurement policies are followed for the purchase of all relevant goods and services.

IREC Accreditation
MiTEC received IREC accreditation July 14, 2020. The IREC accreditation covers the Energy Auditor, Crew Leader, and Quality Control Inspector Job Task Analysis (JTA). Achieving the IREC accreditation allows MiTEC to provide Michigan's Weatherization Network with all required DOE Comprehensive and Specific training.

MiTEC submitted a total of 15 classes with their IREC application. All 15 classes were designed through a curriculum development process that resulted with them being aligned with at least one of the Job Task Analysis (JTA) for Energy Auditor, Quality Control Inspector and/or Crew Leader. All 15 classes submitted with MiTEC's application were accredited by IREC. MiTEC is an IREC accredited training center providing a learning style approach to weatherization technical training and development. Classroom instruction, written and visual materials, hands on instruction, online trainings, and field experience provide a wide range of options to accommodate varied learning styles for adult learners.

Below is a complete listing of the MiTEC's comprehensive courses accredited by IREC.

- Energy Auditor
- Quality Control Inspector
- Crew Leader
- NEAT/MHEA Setup and Maintenance
- NEAT/MHEA Data Entry
- Advanced Air Sealing
- Zone Pressure Diagnostics (ZPD)
- Combustion Appliance Zone (CAZ)
- ASHRAE 62.2
- Dense Pack Insulation
- Mobile Home Weatherization
- Foundation Insulation
- Venting and Combustion Air
- Mechanical Systems Inspection for Auditors
- Weatherization 101

The MDHHS-BCAEO Executive Director supervises the MiTEC Director and by extension the MiTEC staff. MiTEC staff participate in all Weatherization Assistance Program's committees, team projects, field guide and audit tool reviews, conferences, webinars, and meetings that support implementation of the annual U.S. Department of Energy's approved State Plan.

MiTEC is currently staffed with the following positions:

- Director
- Deputy Director
- Program Assistants (Two each)
- Technical Instructors (Three)
- HVAC Instructor (One)
- Weatherization Coordinators (Four)

The above positions represent years of WAP experience in instruction, measure installations, and Subgrantee and Grantee program management.

MiTEC staff either participate in or have knowledge of annual risk assessments, monitoring results, corrective actions, follow-up training activities, policy updates, state plan preparation, data gathered from subgrantee application documents and technical assistance that is managed by the MDHHS-BCAEO. Information from these activities is the basis for annual curriculum development, course work enhancements, class scheduling, and new classes.

MiTEC utilizes a Learning Management System (LMS) for class registration, management of MiTEC's student portal, and student training records. Reports from the LMS system are used to track and manage student success. MiTEC has also increased its use of online trainings to make required trainings more time efficient for the network.

MDHHS-BCAEO, through the establishment of the MiTEC, is responsible for all of Michigan's T&TA needs. MiTEC will provide both comprehensive and specific training in accordance with WPN 22-4 and BCAEO policy requirements.

During PY 2019, a MiTEC Training Board was established. This board is comprised of individuals from Michigan's Weatherization Assistance Program. The primary role of the training board is visionary and advisory. The training board's role will ensure training and technical assistance activities offered by MiTEC will maximize energy savings, minimize production costs, improve program management and crew/contractor quality of work, and reduce the potential for waste, fraud, abuse, and mismanagement. The MiTEC Training Board meets on a quarterly basis.

Brian Treanor, Weatherization Contractor
Naomi Fletcher, MDS Weatherization Manager
Heidi Johnson, Washtenaw Weatherization Manager
Sandy Klank, Southwest Weatherization Manager
Steve Schuster, Macomb Weatherization Manager
Roger Strickfaden, Kent County Weatherization Manager
Justin Walls, Mid-Michigan Weatherization Manager
Tom Andrews, MiTEC Deputy Director
Ray Judy, MiTEC Director
Maddy Kamalay, BCAEO Weatherization Specialist
Kris Schoenow, BCAEO Executive Director

Training and Technical Assistance Resources for MiTEC:
Funding for MiTEC activities is provided through the Michigan Public Health Institute as part of the Training and Technical Assistance allocation to the State of Michigan. Annual funding of MiTEC is determined at the time of the DOE allocation. MiTEC has been established as a mobile training center that utilizes locations regionally throughout the state of Michigan to ensure that student's travel costs are minimized to subgrantees. MiTEC's primary training locations are Highland Park and Farwell, MI in partnership with the local subgrantees in each area. Training and Technical Assistance funds also support local subgrantees to initiate training and to make effective use of MiTEC. To assure coordination of training activities, all Training and Technical Assistance funds are planned and budgeted:

Training and Technical Assistance Funding can cover:

- Costs for travel for attendance at MiTEC trainings, seminars, meetings, or classes.
- Supplemental training not offered by MiTEC. Training must relate directly to the student's job duties.
- Purchase of training materials, including training and testing costs, necessary to meet OSHA safety standards.
- Percentage of salary for a staff person responsible for ensuring that training, safety requirements and needs are met, and to oversee in-house weatherization training.

Training Schedule:
The training schedule is updated on a quarterly basis and made available to the MiTEC website through the website link at www.michigantec.org. MiTEC is close to reaching their two-year establishment date with a staff team holding more than 30 years of experience in the development and implementation of weatherization program and training standards at both the state and federal level. MiTEC staff participates in weatherization leadership meetings and policy advisory council meetings to update technical standards and update training curriculum. Courses in building science, retrofit energy efficiency measures, CAZ, mechanical inspection/repair, ASHRAE, air sealing, insulation, mold/moisture, asbestos, and lead safety are provided with health and safety training integrated into classes.

Instructors:
Each of the instructors are professionals in their fields and hold the BPI Test Proctor credentials.

Certification and CEUs:
Training and certification requirements are provided by MiTEC and include the competencies, knowledge, skills, and abilities for a skilled workforce necessary to perform quality work in the field as described in the JTA identified by NREL.

Continuing Education Units (CEUs) will be made available to subgrantees and students to ensure knowledge, skills, abilities, and technical competencies remain current. Courses offered reflect a commitment to lifelong learning and skill building.

Training Material:
MiTEC is responsible for creating training materials including technical documents, visual illustrations and charts, instructor and student manuals, online course content, and digital media presentations. The training professionals also design and build the props and learning tools for specific hands-on instruction. An example of this would be the demonstration model “prop trailer” retrofitted into a mobile trailer allowing simulated diagnostic testing and hands-on training to be conducted in a controlled environment regionally.

Attendance and Requirements:
Attendance at state sponsored trainings, meetings, webinars, and conferences may be required based on identified need, program deficiencies, and/or to ensure competence in specific areas. In such cases, subgrantee attendance will be required as a matter of program compliance.

Training Cancelation Costs:
Any contractor or staff that registers for a training course through MDHHS-BCAEO MiTEC 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 MDHHS-BCAEO MiTEC 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/MiTEC, the Grantee will be charged a fee of $100. MiTEC will issue a cancelation fee invoice to agency within 2 weeks. This fee is not an allowable Training and Technical Assistance expense and must be paid by unrestricted/nonfederal funds.

PREPARATIONS FOR FUTURE/UPCOMING PROGRAM REQUIREMENTS, EXAMPLES INCLUDE:

- **UPDATED STANDARD WORK SPECIFICATIONS (SWS)**
- **MIGRATION TO ONLINE WEATHERIZATION ASSISTANT**
- **INCLUSION OF SPECIFIC LANGUAGE FROM WEATHERIZATION PROGRAM NOTICES (WPN)**

Weatherization Field Guide and 2020 SWS

Michigan's Weatherization field guide was approved by DOE in 2021 and aligns with the 2020 SWS items. The updated field guide was a template from Saturn with many edits from Michigan's technical staff for our state specific program.

Migration to Online Weatherization Assistant

Full NEAT and MHEA (WA v10) transition will be completed by the updated deadlines as determined by DOE.

MiTEC is responsible for delivering training to prepare Michigan's WAP for the transition to WA v10. Due to delays in software updates, MDHHS-BCAEO will determine the timeframe of this transition when further guidance is released by DOE. When the timeline is determined, MiTEC will ensure all instructors are trained in WA v10 as training becomes available and information is released by DOE and ORNL. MiTEC will also strive to have the appropriate participation in the WAP Training Providers Summit.

Conversion Planning Timeline:

ORNL Goals	MiTEC Tasks	Timeline
Conversion Curriculum Release	Develop Michigan's conversion handbook and classes based on curriculum materials for users released by ORNL in March 2021	TBD
Identify and engage Training Providers to solicit input on materials to be developed for Core Curriculum	Prepare a list of key items to share in the development of the Core Curriculum	TBD
Present training curriculum plan and materials at the WAP Training Providers' Summit	Participate in WAP Training Providers' Summit	TBD
	Develop a pilot group to test WA v10 in Michigan	TBD

Core Curriculum Release	Train all MiTEC instructors and weatherization MDHHS-BCAEO Staff Finalize the integration of the Core Curriculum into all user materials, classroom presentations, and handbooks	TBD	
	Develop, implement, and test MDHHS-BCAEO conversion strategies which includes policy updates, technology base configurations, and data security. Dashboard development will start as the pilot group enters jobs into WA v10.	TBD	
	Pilot group meeting to discuss conversion strategies	TBD	
	Discuss Core Curriculum and collect feedback in a virtual meeting. Collect information and share information from pilot groups at the meeting.	TBD	
Host train the trainer events	All MiTEC instructors and weatherization MDHHS-BCAEO staff will attend a train the trainer event.	TBD	
	Update Core Curriculum	TBD	
	Implement training schedule	TBD	

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

Community Services Policy Manual (CSPM): The CSPM requires very specific training and certification to fulfill the requirements of the work in the field. No untrained staff is allowed in the field without supervision as noted in the CSPM. CSPM 618and 618.1 (Annual contract language requires subgrantees to implement all CSPMs).

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 an IREC accredited Quality Control Inspector Certification. Comprehensive training must be renewed every 3 years for individuals working in this JTA.

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 subgrantee is ultimately responsible for ensuring that every completed unit reported meets the quality guidelines required by the Weatherization Assistance Program. The subgrantee must provide in their subgrantee plan a policy for validation of the QCI credentials.

The subgrantee must have policies and procedures in place to address situations where a QCI is not inspecting units using the standards adopted by the subgrantee and consistent with the SWS and JTA. The policy must include monitoring of the QCI and procedures for disciplinary action if the subgrantee inspection protocols are not followed.

Energy Auditors
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. It is the Subgrantee's responsibility to ensure the Energy Auditor can perform all tasks related to the WAP including client education, WA8, FACSPro, IWC policy requirements, and ensuring performance and skills meet the requirements of the WAP.

BCAEO allows for individuals who have obtained the SOM EA certification to perform audits in this role for 18 months while working to obtain the experience needed to obtain the BPI EA certification. After 18 months, the individual must successfully obtain the BPI EA certification to continue working in the EA JTA in Michigan.

All Energy auditor candidates must be sponsored by one of the Subgrantee agencies in the Michigan WAP network. The sponsoring Subgrantee will be responsible for the field training necessary to prepare candidates sufficiently for other required training and testing. The individual must also successfully complete the Energy Auditor Comprehensive training course through MiTEC before obtaining either the SOM or BPI EA certification. After an individual successfully obtains either EA certification, they must submit their first 3 energy audits post certification to MDHHS-BCAEO for review. Comprehensive training must be renewed every 3 years for individuals working in this JTA.

Crew Leader (Single Family)
A Crew Leader is responsible for supervising the retrofitting activities specified in the scope of work. They are 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. It is the subgrantees responsibility to ensure that all untrained staff must not be left without supervision in the field during weatherization. Crew leaders must participate in a Comprehensive training for the RIT JTA or the Performance Based Modules and also the Crew Leader Comprehensive training to meet comprehensive training requirements. Comprehensive training must be renewed every 3 years for individuals working in this JTA.

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". It is the subgrantees responsibility to ensure that all untrained staff must not be left without supervision in the field during weatherization. Comprehensive training must be renewed every 3 years for individuals working in this JTA.

Required trainings and/or certifications by JTA in Michigan WAP Network:

Training & Certification	Type	Retrofit Installer	Crew Leader	Energy Auditor	QCI	Notes
Crew Leader	Comprehensive Training		Required			MiTEC accredited course
Energy Auditor	Comprehensive Training			Required		MiTEC accredited course
Quality Control Inspector	Comprehensive Training				Required	MiTEC accredited course
State of Michigan Energy Auditor Certification	Required Certification (if not immediately obtaining BPI)			Required		SOM Energy Auditor Certification valid for an 18-month grace period prior to obtaining BPI Energy Auditor (individuals may also opt to immediately obtain BPI EA and skip this step) Certification
BPI HEP Energy Auditor Certification	Required Certification			Required	Required	Required either immediately or after 18 months of an individual holding the SOM EA certification to perform energy audits
BPI Quality Control Inspector Certification	Required Certification				Required	
EPA's Lead Renovation, Repair, and Painting Certification/EPA Firm License	Required Certification					See CSPM 618 – Firm requirement for every entity performing work that may disturb lead

Weatherization 101	Comprehensive Training	x	x			MiTEC Course – any course with “x” may meet Comprehensive Training requirement for JTA
Advanced Air Sealing	Comprehensive Training	x	x			MiTEC Course – any course with “x” may meet Comprehensive Training requirement for JTA
Dense Pack Insulation	Comprehensive Training	x	x			MiTEC Course – any course with “x” may meet Comprehensive Training requirement for JTA
Foundation Insulation	Comprehensive Training	x	x			MiTEC Course – any course with “x” may meet Comprehensive Training requirement for JTA
Mobile Home Weatherization	Comprehensive Training	x	x			MiTEC Course – any course with “x” may meet Comprehensive Training requirement for JTA
ASHRAE 62.2 Standards	Comprehensive Training			x	x	MiTEC Course – any course with “x” may meet Comprehensive Training requirement for JTA
CAZ Pressure Diagnostics	Comprehensive Training			x	x	MiTEC Course – any course with “x” may meet Comprehensive Training requirement for JTA
Mechanical Systems Inspection for Auditors (MSIA)	Comprehensive Training			x	x	MiTEC Course – any course with “x” may meet Comprehensive Training requirement for JTA
NEAT/MHEA Setup	Comprehensive Training			x	x	MiTEC Course – any course with “x” may meet Comprehensive Training requirement for JTA
NEAT/MHEA Data Entry	Comprehensive Training			x	x	MiTEC Course – any course with “x” may meet Comprehensive Training requirement for JTA
Venting & Combustion Air	Comprehensive Training			x	x	MiTEC Course – any course with “x” may meet Comprehensive Training requirement for JTA
Zone Pressure Diagnostics	Comprehensive Training			x	x	MiTEC Course – any course with “x” may meet Comprehensive Training requirement for JTA
Lead Safe Work Practices (LSW)	Specific Training	Required	Required	Required	Required	LRRP may substitute for this training for an individual. Must be taken within 180 days of beginning work in JTA.

Health and Safety Training	Specific Training	Required	Required	Required	Required	MiTEC Course Includes health and safety training and indoor air quality/mold (formally known as IAQ). Must be taken within 180 days of beginning work in JTA.
OSHA 10 Hour	Specific Training	Required	Required	Required	Required	Online Training OSHA 30 may substitute for this training requirement for an individual. Must be taken within 180 days of beginning work in JTA.
Venting & Combustion Air	Comprehensive Training					MiTEC Course
Weatherization 101	Comprehensive Training					MiTEC Course
Zone Pressure Diagnostics	Comprehensive Training					MiTEC Course
Client Education	Specific Training					MiTEC Course

PARTNERSHIPS WITH THE STATEWIDE HOME PERFORMANCE INDUSTRY ON TRAINING ISSUES; IF APPLICABLE.
Michigan's Energy Waste Reduction Low Income Workgroup (EWR LI WG) EWR, created under Public Act 295 of 2008, as amended by Public Act 342 of 2016), also known as the clean and renewable energy and energy waste reduction act, requires all-natural gas and electric utility providers in the state to implement programs for their customers to reduce overall energy usage by specified targets, in order to reduce the future cost of service to utility customers. Training: Weatherization, energy efficiency, and technical measures. **Michigan Energy Efficiency Contractor Collaborative** This unofficial group of cross industry stakeholders has been meeting since late 2021 in order to better understand the disconnect between existing contractors and bidding on WAP work. The group includes individuals internal and external to the Michigan WAP, but all stakeholders are involved in the energy efficiency contractor space in Michigan. So far the collaborative has facilitated a detailed survey on the contractor network's perspective of the WAP to increase our understanding of barriers to expanding with existing contractors. **Michigan Climate and Health Adaptation Program (MICHAP)** The Michigan Department of Health and Human Services Division of Environmental Health established the MICHAP. MICHAP is charged with protecting the health of Michigan's citizens from threats related to climate change, with support and guidance of the Centers of Disease Control & Prevention's – Climate Ready States & Cities Initiatives. MDHHS-BCAEO and MICHAP are currently partnering on an assessment of Medicaid related medical visits pre- and post-Weatherization work to better understand the Michigan WAP's affect on these types of medical visits. Training: Weatherization and health. **Low-Income Home Energy Assistance Program (LIHEAP)** The Michigan Department of Health and Human Services, as the designated lead agency responsible for the administration of these federal funds. The components of Michigan's energy assistance effort and the responsible agency for each are as follows: • Home Heating Credit: Department of Treasury • Crisis Intervention: MDHHS • Weatherization Assistance Program: MDHHS Training: Weatherization, energy efficiency, technical measures, and client education.

Michigan Energy Assistance Program (MEAP)
MEAP, created under Public Act 615 of the Michigan Public Acts of 2012. The purpose of the MEAP is to establish and administer programs statewide that provide energy assistance and self-sufficiency services to eligible low-income households. Self-sufficiency services include assisting participants with the following:

- Paying their bills on time;
- Budgeting for and contributing to their ability to provide energy expenses, which may include enrollment into an affordable payment plan (APP);
- And utilizing energy services to optimize on energy efficiency.

Training: Client education

American Society of Heating, Refrigerating and Air Conditioning (ASHRAE) Member
ASHRAE is an organization overseeing and developing ventilation standards.

Air Conditioning Contractors of America (ACCA)
ACCA advocates for the HVAC industry, provides HVAC training opportunities, assists with HVAC related accreditations, and is active with HVAC standards and codes.

Energy Out West (EOW)
EOW is an organization comprised of Weatherization Assistant Program (WAP) professionals from across the country. EOW develops and delivers a national Weatherization training conference every two years. In addition to providing the training conferences, EOW works with DOE and NASCSP to provide technical assistance and support to efforts in Congress regarding funding and instruction related to the WAP.

International Code Council (ICC)
The ICC nonprofit association provides a wide range of building safety solutions included product evaluation, accreditation, certification, codification, and training. They develop model codes and standards used worldwide to construct safe, sustainable, affordable, and resilient structures.

Building Performance Institute (BPI)
BPI is the certifying body for DOE for the Energy Auditor, Quality Control Inspector, Crew Leader and Retrofit Installer Certifications. BPI also oversees DOE Weatherization Training Centers to become BPI Test Centers.

National Renewable Energy Laboratory (NREL)
NREL advances the science and engineering of energy efficiency, sustainable transportation, and renewable power technologies and provides the knowledge to integrate and optimize energy systems. NREL is one of many laboratories utilized by DOE in energy efficiency research in cooperation with the Weatherization Assistance Program. NREL works closely with DOE in development of program management training for WAP.

Oak Ridge National Laboratory (ORNL)
ORNL is the largest US Department of Energy science and energy laboratory, conducting basic and applied research to deliver transformative solutions to compelling problems in energy and security. ORNL works closely with DOE in the development and ongoing management of the NEAT/MHEA energy audit tool. They provide training and technical assistance to WAP Grantees related to the Weatherization Assistant (WA) line of energy audit software.

HOW DOES ANALYSIS CONDUCTED, AS DETAILED IN SECTION V.6 OF THE ANNUAL APPLICATION, INFLUENCE THE DEVELOPMENT OF T&TA ACTIVITIES AND PRIORITIES?

Analysis for State Training and Technical Assistance:

MDHHS-BCAEO completes the following reviews to provide insight on the training needs of the network:

- Local training activities and local training and technical expenditure reports
- MiTEC monthly attendance and monthly training reports
- MiTEC quarterly training schedule
- Monthly review of MiTEC to measure and track training effectiveness
- Onsite monitoring of local programs
- All students show a certificate of completion for completing each class, which are maintained by subgrantees, students, and MiTEC and reviewed by MDHHS-BCAEO Weatherization Technical Monitors
- Feedback from subgrantees is used to direct training, technical assistance, field guidance, and policy
- Review of the annually submitted Service Plan Spreadsheets (SPS) from each Subgrantee. The SPS details all required trainings and certifications for all individuals working in a JTA at the Subgrantee's WAP and gives MDHHS-BCAEO an annual perspective on current compliance. MDHHS-BCAEO utilizes this information to drive MiTEC's training planning goals.
- Monitoring reports are shared with MiTEC, subgrantees, and the board chair.
- The MiTEC Board will meet quarterly to discuss training issues and requirements and to direct and improve the process of training the weatherization network.
- MDHHS-BCAEO is working towards calculating effectiveness in energy efficiency of weatherized jobs through pre- and post-utility data collection and training on an energy efficiency model
- MDHHS-BCAEO evaluates production and expenditure goals on a quarterly basis and shares results with the subgrantees which has been a method of continuous improvements, efficient and effective processes, and strong training commitment from the network

3.0 – WORKFORCE CREDENTIALS

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

FEDERALLY REQUIRED CREDENTIALS. EXAMPLES INCLUDE:

- **ENVIRONMENTAL PROTECTION AGENCY LEAD RENOVATION, REPAIR, AND PAINTING PROGRAM**
- **HOME ENERGY PROFESSIONALS' QUALITY CONTROL INSPECTOR CERTIFICATION**

Michigan ensures subgrantee's technical weatherization staff have the qualifications and skills to meet the DOE identified National Renewable Energy Laboratories Job Task Analysis (JTAs) for each position as outlined in WPN 22-4.

HEP Quality Control Inspector Certification: (Required)
The Home Energy Professional (HEP) Quality Control Inspector certification is offered by BPI and is supported by the U.S. Department of Energy (DOE) and its National Renewable Energy Laboratory (NREL). By earning the HEP Quality Control Inspector certification, an individual proves that they can verify the compliance of retrofit work performed based on work plans and standards, conduct audits and inspections using diagnostic equipment, and can develop reports that specify corrective actions to achieve whole house performance. To qualify for the HEP Quality Control Inspector Certification, an individual must possess a HEP Energy Auditor Certification.

EPA Lead Renovation, Repair and Painting (LRRP) Certification: (Required)
The US Environmental Protection Agency (EPA) produced the Lead Renovation, Repair and Painting Program that requires each job have an EPA Certified Renovator on-site during job set up and completion. The certified person is responsible for documenting that all work is done in a lead safe manner. LRRP Certification, in general, covers the following activities that disturbs in pre-1978 housing and child-occupied facilities:

- Remodeling and repair/maintenance
- Electrical work
- Plumbing
- Painting preparation
- Carpentry
- Window replacement

Weatherization 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. 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.

OSHA-10 Hour Training Completion Certification: (Required)
Occupational Safety and Health Administration 10-hour completion certification will ensure basic work safe environment practices are applied and how to avoid workplace hazards by weatherization workers. Workers may opt to hold the OSHA 30 hour certification as an alternative. New staff (Energy Auditors/QC Inspectors and agency crews/contractors) are required to attend training within 180 days of the date they are hired.

GRANTEE/STATE REQUIRED CREDENTIALS. EXAMPLES INCLUDE:

- **BUILDING PERFORMANCE INSTITUTE BUILDING ANALYST**
- **GRANTEE-DEVELOPED CERTIFICATIONS**

Michigan ensures subgrantees' technical weatherization staff have the qualifications and skills to meet the DOE identified National Renewable Energy Laboratories Job Task Analysis (JTAs) for each position as outlined in WPN 22-4.

Interstate Renewable Energy Council (IREC) Accreditation
MiTEC became a IREC accredited training center on July 14, 2020 to conduct training on the following JTAs:

- Retrofit Installer
- Crew Leader
- Energy Auditor
- Quality Control Inspector

Michigan's technical field staff must participate in Comprehensive Training in alignment with their JTA every three years. MiTEC's training records are stored in the Learning Management System to track all credentials.

HEP Retrofit Installer Technician: (Optional)
The Home Energy Professional (HEP) Retrofit Installer Technician certification is offered by BPI and is supported by the U.S. Department of Energy (DOE) and its National Renewable Energy Laboratory (NREL). Those who become a certified Retrofit Installer Technician prove by passing vigorous examinations that they can properly install residential envelope air sealing, HVAC duct sealing, insulation, windows and doors, mechanical ventilation, and roofing upgrades in single family homes and small multifamily housing.

HEP Crew Leader Certification: (Optional)
The Home Energy Professional (HEP) Crew Leader certification is offered by BPI and is supported by the U.S. Department of Energy (DOE) and its National Renewable Energy Laboratory (NREL). The HEP Crew Leader certification demonstrates advanced competency through rigorous written and field exams, and work experience prerequisites. By obtaining the Crew Leader certification, an individual will have the ability to ensure the quality, and supervision, of the installation and performance of prescribed energy efficiency upgrades, as laid out in a scope of work.

HEP Energy Auditor Certification: (Required after 18 months of holding the SOM EA Certification)
The Home Energy Professional (HEP) Energy Auditor certification is offered by BPI and is supported by the U.S. Department of Energy (DOE) and the National Renewable Energy Laboratory (NREL). The HEP Energy Auditor certification demonstrates advanced competency through rigorous online and field exams, and work experience prerequisites. Once certified, an individual will be able to evaluate the energy efficiency, health,

and safety of a home. Energy Auditors will obtain in-depth knowledge of how to use diagnostic equipment and modeling software to identify areas for energy savings, produce an audit report, and develop a prioritized scope of work. Getting the Energy Auditor certification automatically earns you the BPI Building Analyst (BA) certification.

HEP Energy Auditor Certification: (Required after 18 months of holding the SOM EA Certification)
The Home Energy Professional (HEP) Energy Auditor certification is offered by BPI and is supported by the U.S. Department of Energy (DOE) and the National Renewable Energy Laboratory (NREL). The HEP Energy Auditor certification demonstrates advanced competency through rigorous online and field exams, and work experience prerequisites. Once certified, an individual will be able to evaluate the energy efficiency, health, and safety of a home. Energy Auditors will obtain in-depth knowledge of how to use diagnostic equipment and modeling software to identify areas for energy savings, produce an audit report, and develop a prioritized scope of work. Getting the Energy Auditor certification automatically earns you the BPI Building Analyst (BA) certification.

State of Michigan Energy Auditor Certification: (Required until HEP Energy Auditor Certification is achieved)
The State of Michigan Energy Auditor certification is offered by MiTEC to ensure energy audits can be completed with knowledgeable individuals until the HEP Energy Auditor Certification can be achieved. Typically, the SOM Energy Auditor Certification valid 18 months. The SOM Energy Auditor certification demonstrates competency through training, an onsite field exam, and work experience prerequisites. Once certified, an individual will be able to conduct energy audits for 18 months while working towards achieving the HEP Energy Auditor Certification through BPI.

Health and Safety (formerly IAQ/Mold) Certification of Completion: (Required)
Health and Safety Certification of Completion will ensure weatherization workers can identify conditions that promote mold growth, health and safety issues (outlined in WPN 22-7), and how to prevent worsening conditions. New weatherization staff is required to achieve certification of completion within 180 days of the date of hire. All required training/certification must be completed within 180 days of the date they are hired.

Lead Safe Work (LSW) Certificate of Completion: (Required)
LSW Training is available through MiTEC and can be performed either in-person or online. All required training/certification must be completed within 180 days of the date they are hired. LRRP Certification can substitute this certification of completion.

OSHA 10 Training/Certification: (Required)
Training shall be provided by Occupational Safety and Health Administration qualified instructor. The construction “10-hour Occupational Safety and Health training course” is required for Weatherization staff in all JTAs. All individuals working in a JTA 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. Documentation relative to certification shall be maintained at the agency. All required training/certification must be completed within 180 days of the date they are hired. 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.

SUBGRANTEE/LOCAL REQUIRED CREDENTIALS. EXAMPLES INCLUDE: • **CONTRACTOR LICENSING**
Each year as a component of the DOE plan submission and budget process, agencies submit information regarding which contractors are currently working with the agency. Additionally, confirmation is provided that the agency collects and maintains documentation of proper licensing and insurance for these contractors. Through a monitoring process conducted annually, BCAEO monitors review a selection of documentation collected by the agency to confirm up to date licenses including residential builders license, mechanical license, LRRP Firm certification, and insurance. Subgrantee 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/H&S training • 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.
INDUSTRY REQUIRED CREDENTIALS. EXAMPLES INCLUDE: • **EQUIPMENT/MATERIAL MANUFACTURE CERTIFICATION** • **VENDOR CERTIFICATION** **(E.G. EQUIPMENT/MATERIAL MANUFACTURE CERTIFICATION, VENDOR CERTIFICATION)**
Each year as a component of the DOE plan submission and budget process, agencies submit information regarding which contractors are currently working with the agency. Additionally, confirmation is provided that the agency collects and maintains documentation of proper licensing and insurance for these contractors. Through a monitoring process conducted annually, BCAEO monitors review a selection of documentation collected by the agency to confirm up to date licenses including residential builders license, mechanical license, LRRP Firm certification, and insurance. Agencies will receive a monitoring report and may be required to updated certification information.

PROCESS FOR MAINTAINING WORKFORCE CREDENTIALS
To ensure Subgrantee 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, the BCAEO/MiTEC will ensure compliance with Weatherization Program Notice 22-4. CSPM 618 outlines the required workforce credentials required for individuals working in a JTA as an Energy Auditor, QCI, Crew Leader and Retrofit Installer. During the agency plan submission process, agencies provide a roster of active individuals working in the WAP. Agencies are responsible for collecting documentation on completed training and credentials such as the State of Michigan Energy Auditor Certification, BPI Energy Auditor Certification and BPI Quality Control Certification. Agencies are expected to confirm all required certification is up to date for Energy Auditors and QCIs. Annually, BCAEO Technical Monitors review a selection of documentation collected and provided by the agency to confirm proper credentials. All Subgrantees 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. It is the Subgrantees responsibility to ensure that all untrained staff must not be left without supervision in the field during weatherization.
HOW CREDENTIALS ARE TRACKED
During the DOE application process, agencies complete a spreadsheet identifying contracting companies that work with the agency as well as all individuals working in a JTA employed by either those contractor companies or the agency. Agencies are expected to maintain documentation of credentials and provide copies to the State by uploading to SharePoint. MDHHS-BCAEO has a Learning Management System (LMS) to track training provided by MiTEC and are working on an integration plan so all credentials, training, and certifications are maintained in one location. 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 within 30 days of completion. 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. Each Subgrantee is required to inform BCAEO of any agency contractor/staff that achieves any of the Home Energy Professional 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.

4.0 – TRAINING

GRANTEES HAVE TWO OPTIONS TO DESCRIBE THEIR TRAINING.

A) USE THE EMBEDDED SPREADSHEET* TO IDENTIFY AND DESCRIBE THE TRAINING SCHEDULE FOR GRANTEE AND SUBGRANTEE STAFF. INCLUDE TECHNICAL AND NON-TECHNICAL TRAINING.
B) OR USE THE FIELDS BELOW TO IDENTIFY AND DESCRIBE THE TRAINING SCHEDULE FOR GRANTEE AND SUBGRANTEE STAFF. INCLUDE TECHNICAL AND NON-TECHNICAL TRAINING.

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

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

* THE EMBEDDED SPREADSHEET, IF COMPLETED AT THE END OF THE YEAR TO RECORD DELIVERED TRAINING, CAN BE USED AS DOCUMENTATION FOR THE REQUIRED ANNUAL T&TA REPORT. DOUBLE CLICK TO OPEN SPREADSHEET. ENTER INFORMATION AND CLOSE. IT WILL AUTOMATICALLY SAVE YOUR INFORMATION

TTA Planning and
Reporting Template F

PROGRAMMATIC/ADMINISTRATION TRAINING

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

Subgrantees 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 subgrantees 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.

The subgrantees 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.

Training in key topic areas will be developed and delivered over the next three years. When possible, MDHHS-BCAEO will record classes and make them available online. Training topics are held at conferences and other MDHHS-BCAEO training opportunities. It is expected that all new weatherization managers enroll in the 12-month weatherization manager's training program. It is offered once every three years.

Financial Management Training:

- Weatherization Financial Training 2 CFR 200
- Ethic, Conflict of Interest, and Background Checks
- Financial Management
- Budgeting and the application process
- Accounting and Internal Controls
- Procurement: consulting and contractor contracts
- Purchasing
- Payroll and Cost allocation
- Travel
- Program Income
- Equipment
- Inventory
- Financial Reports and Performance Analysis

Program Management Training:

- Weatherization 10 CFR 440
- Legislation, Regulations, WPN, CSPM, and Contract
- Ethics and Conflict of Interest
- Annual Planning
- Recordkeeping
- Monitoring and follow-up
- Quality Control and Standard Work Specifications
- Energy Audits
- Programmatic Management
- Performance Management
- Reporting
- Performance Analysis
- Health and Safety/Optional Measures
- Leveraging
- Training and Required Certifications

Over the past four years, MDHHS-BCAEO held three Weatherization Management 12-month training programs, two for new weatherization managers program and followed with an advanced weatherization manager training program. The decision to train a cohort of weatherization managers was based on a high percentage of new weatherization managers in the program. In PY21 there was a large amount of turnover in Weatherization Managers so it was determined that another New Manager Cohort was appropriate. Above topics will be available over the next three years to ensure continued learning and growth opportunities for weatherization professionals.

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

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

Comprehensive Training for Energy Auditor (EA), Quality Control Inspector (QCI), Crew Leader and Retrofit Installer will be required for all WAP workers within their JTA aligned position. MiTEC is responsible for ensuring that Comprehensive Training is provided in accordance with CSPM, Michigan Retrofit Field Guide (aligned with the SWS), and WPN 22-4.

MDHHS-BCAEO will develop online training videos for performance improvement that will be available as annual refreshers. Subgrantees will develop an annual training plan for contractors and crews starting in PY22 with new training opportunities at MiTEC.

MiTEC will use the below accredited curriculum to meet the Comprehensive Training Needs of Michigan's WAP Network for PY 2022.

- Energy Auditor
- Quality Control Inspector
- Crew Leader
- NEAT/MHEA Setup and Maintenance
- NEAT/MHEA Data Entry
- Advanced Air Sealing
- Zone Pressure Diagnostics (ZPD)
- Combustion Appliance Zone (CAZ)
- ASHRAE 62.2
- Dense Pack Insulation
- Mobile Home Weatherization
- Foundation Insulation
- Venting and Combustion Air
- Mechanical Systems Inspection for Auditors
- Weatherization 101

Comprehensive Training Plan for PY 2022

Focus Areas:

- Requirements for all WAP Energy Auditors, QCIs, Crew Leaders and Retrofit Installers/Technicians
  - See attached CSPM 618 and JTA flow charts for all requirements
- Development of Workforce
  - Create, implement, promote, and train Career Tracks for
    - Retrofit Installers
    - Crew Leaders
    - Energy Auditor
    - Quality Control Inspectors
- Implementation of Performance-Based Modules for retrofit installers and crew leaders

Below are the base offerings for the existing Michigan Weatherization Assistance Program Network:

Course Offering	Estimated Number of Completed Trainings	JTA Alignment			
		EA	QCI	CL	RI
Energy Auditor	18	X	X		
Quality Control Inspector	15		X		
Crew Leader	18			X	
NEAT/MHEA Setup	10	X	X		
NEAT/MHEA Data Entry	10	X	X		
Advanced Air Sealing	24			X	X
Zone Pressure Diagnostics	12	X	X		
Combustion Appliance Zone (CAZ)	18	X	X		
ASHRAE 62.2	18	X	X		
Dense Pack Insulation	24			X	X
Mobile Home Weatherization	30			X	X
Mechanical Systems Inspection for Auditors	20	X	X		
Weatherization 101	24			X	X
Venting & Combustion Air	10	X	X		
Foundation Insulation	20			X	X

Course Catalog:

Crew Leader/Retrofit Installer Training

This two-day class is intended to provide participants with the required knowledge regarding regulations, methods, processes, and the abilities required for individuals supervising shell projects in the DOE National Weatherization Program. We will cover planning the scope of work, preparation and maintenance of the job site, implementation of the scope of work, managing the project and finalizing the job. We will also review and discuss the theory and concepts behind building science, the importance of health and safety, and programmatic requirements. Included will be discussions on the relationships between the crew leader and other weatherization professionals and how to put everything covered in this course together to ensure a successful, productive, profitable, and comprehensive job completion.
(BPI CEUs: 3.25)

Learning objectives:

- Recognize the requirements of persons in the role of weatherization crew leader
- Express leadership skills for effectively managing a crew and problem solving
- Locate and discuss all forms and documents required of a crew leader in the Michigan WAP
- Elaborate on the actions of developing a plan to execute the scope of work
- Indicate what is needed to prepare and maintain a job site
- Identify the processes of implementing the scope of work
- Plan what is required to manage the entire project
- Describe the steps a crew leader takes in finalizing the job

- Define the relationships with other weatherization staff
- Illustrate the role of the crew leader in maintaining quality control
- Associate the importance of safe work practices throughout the project
- Calculate and anticipate the need for controlled ventilation

Comprehensive Classes:

- Crew Leader (not needed for retrofit installer)
- Weatherization 101
- Air Sealing
- Dense Pack Insulation
- Foundation Insulation
- Advanced Mobile Home Weatherization
- Performance-Based Training Module (Retrofit Installer option)

Certifications:

- Retrofit Installer
  - Certification of Completion for all Required Classes and Core Classes OR
  - Performance-Based Competency Module Certifications
- Crew Leader
  - Certification of Completion for all Required Classes and Core Classes

Regular Training and Updates:

- New Crew members and Crew Leaders will participate in the comprehensive classes listed above during their first 12 months in the JTA. Individuals enrolling in the performance-based training will be expected to complete the program within 12 to 18 months.
- MDHHS-BCAEO expects Crew members and Crew Leaders to attend all state required training during the year to ensure updates occur in the field. Updates are provided at the annual conference sponsored by MDHHS-BCAEO.
- Retrofit Installers and Crew Leaders must take one comprehensive class listed above every 3 years and all required classes for the program year.

Energy Auditor Training

This five-day class is intended to provide participants with the knowledge of the steps involved in the process of becoming an Energy Auditor in the DOE National Weatherization Program. In the classroom, we will discuss theory, concepts, inspection, and the audit process from beginning to end interspersed with classroom activities to reinforce those concepts and inspection procedures. For hands-on, we will perform tasks associated with performing a complete energy audit. Participants are expected to have a knowledge base in place which will allow a viable transition from knowing to implementation. The goal of this class is to take information learned in other classes and in the field and "put it all together" into a comprehensive audit process. There are recommended prerequisites before taking this class. (BPI CEUs: 8)

Prerequisites:

- Successful completion of Weatherization Installer or Crew Leader courses or equivalent OR
- Currently hold a Building Analyst / Energy Auditor certification or have been working as an energy auditor OR
- Have requisite experience in the energy conservation field

Learning objectives:

- Recognize the requirements needed to function as an Energy Auditor in the DOE Weatherization Program
- Locate and discuss all forms and documents required as part of the audit process
- Organize class information and previous knowledge base into a comprehensive field audit process
- Demonstrate Auditor skills and inspection processes in the field per Michigan and BPI HEP EA standards
- Formulate a viable work scope for a home
- Validate work scope recommendations

Comprehensive Classes:

- Energy Auditor
- Mechanical Systems Inspection for Auditors
- NEAT/MHEA Set Up and Maintenance
- NEAT/MHEA Data Entry
- CAZ Pressure Diagnostics
- ASHRAE 62.2
- Venting & Combustion Air
- Zone Pressure Diagnostics (ZPD)

Certification:

- State of Michigan Energy Auditor Certification
  - Valid for up to 18-months
- HEP Energy Auditor Certification
  - New individuals will have an 18-month grace period from the date the SOM Energy Auditor Certification was achieved to obtain HEP Energy Auditor Certification
  - HEP Energy Auditor Certifications must be recertified every 3 years

Regular Training and Updates:

- New Energy Auditors will participate in the classes and must successfully achieve the State of Michigan Energy Auditor Certificate during their first 18 months in the field.
- MDHHS-BCAEO expects Energy Auditors to attend all state required training during the year to ensure updates occur in the field. Updates are provided at the two annual conferences sponsored by MDHHS-BCAEO.
- Energy Auditors must take one comprehensive class listed above every 3 years and all required classes for the program year.
- Energy Auditors must recertify the HEP Energy Auditor Certification every 3 years.

Quality Control Inspector Training

This one-day class is intended to provide individuals guidance toward gaining the BPI Home Energy Professional (HEP) Quality Control Inspector micro-credential within the requirements of the DOE Weatherization Assistance Program. Provided will be knowledge of the necessary steps to gain certification and identify the role and expectations of a QCI. We will outline techniques for evaluating the work scope completely and accurately from desk top preview to in-progress visits through job completion. We will also discuss measures effectiveness, missed opportunities, additional work and report writing. This course will include a written assessment for final completion. There are recommended prerequisites before taking this class.

Learning Objectives:

- Explore the steps to receive a QCI micro-credential through a BPI test center
- Locate policy, regulations, and standards as they apply to a scope of work
- Identify worker compliance with safety regulations
- Indicate protocol of a QCI in-progress evaluation
- Interpret on site documentation accuracy
- Define installed measures and initial assessment details
- Reference standards in relation to installed measures
- Determine if scope of work policy requirements have been satisfied
- Identify techniques and procedures for successful inspections
- Describe desktop, in-progress, monitoring, and reporting methods
- Trace QCI responsibilities related to the work scope from beginning to end
- Evaluate missed opportunities and scope of work omissions

Prerequisites:

- Successful completion of Weatherization Energy Auditor course or equivalent
- Currently hold a Building Analyst / Energy Auditor certification or have been working as an energy auditor
- Have requisite experience in the energy conservation field

Comprehensive Class:

- Quality Control Inspector
- Mechanical Systems Inspection for Auditors
- NEAT/MHEA Set Up and Maintenance
- NEAT/MHEA Data Entry
- CAZ Pressure Diagnostics
- ASHRAE 62.2
- Venting & Combustion Air
- Zone Pressure Diagnostics (ZPD)

Certification:

- HEP Quality Control Inspector Certification (BPI) to be recertified every 3 years

Regular Training and Updates:

- MDHHS-BCAEO expects Quality Control Inspectors to attend all state required training during the year to ensure updates occur in the field. Updates are provided at the two annual conferences sponsored by MDHHS-BCAEO.

- Quality Control Inspectors must take one comprehensive class listed above every 3 years and all required classes for the program year.
- Quality Control Inspectors must recertify the HEP Quality Control Inspector Certification every 3 years.

ASHRAE 62.2 Training

ASHRAE Standards 62.2 certification of completion will address ventilation and acceptable indoor air quality in low-rise residential buildings. Energy Auditors and Quality Control Inspectors will be required to achieve an ASHRAE 62.2 certification of completion. Individuals will be able to understand ASHRAE calculations, proper use of calculation forms, and ventilation requirements and techniques to achieve compliance.

Classes:

- ASHRAE 62.2 training by MiTEC

Certification:

- Certification of Completion

Combustion Appliance Zone Training

This 1-day class is designed for Auditors and Technicians who are responsible for performing CAZ pressure diagnostics and affecting repairs. We have long been familiar with the term “worst case” draft testing and H&S has always been our first consideration when performing CAZ pressure testing. While H&S is our primary concern, there are also building durability, comfort, IAQ and efficiency issues that we must consider. In this class we will discuss concepts and root causes of pressure issues along with CAZ testing procedures and equipment. From a more complete perspective, participants will then be challenged to interpret diagnostic test results and identify appropriate repairs to help ensure that the building works in all respects. Combustion Appliance Zone (CAZ) certification of completion will ensure the safety of agency staff, weatherization contractors, and occupants. Individuals will understand the Building Performance Institute (BPI) standards for combustion safety test procedures for vented appliances which covers testing of gas or oil forced air systems, boilers, domestic how water heaters, gas fired ranges and ovens. Additionally, attendees using a combustible gas leak detector will be taught the proper sequence of gas leak detection/evaluation and understand proper CAZ testing for all conditions, as outlined in the BPI standards.

Class:

- CAZ training by MiTEC

Certification:

- Certification of Completion

Regular Training and Updates:

- Training is geared for auditors and technicians. Continued training on this topic is necessary until high energy efficiency in weatherization can be achieved.

Mobile Home Training

Mobile Home Certificate of Completion will ensure individuals have knowledge on issues specific to manufactured housing, how to conduct-work diagnostics and repairs, retrofit a mobile home belly with insulation, insulate sidewalls and roods, and check heating systems. The training is to ensure that those in the appropriate roles in Michigan's WAP workforce understand proper duct pan testing and duct sealing.

Classes:

- Mobile Home training by MiTEC

Certification:

- Certification of Completion

Advanced Air Sealing Training

Advanced Air Sealing is a rigorous, one-day course emphasizing the importance of effective air sealing within the Weatherization Assistance Program. Focusing on known techniques and theory we will examine and implement how to detect air sealing opportunities and common leakage sites, determine appropriate tools and materials needed for air sealing, discuss air sealing guidance and best practices, and verify that an effective air barrier has been established. This course is a combination of classroom, lab, and field air.

Learning Objectives:

- Describe the function and location of pressure and thermal boundaries
- Summarize the basic concepts, theory, and principles of air leakage
- Identify access to specific air sealing work areas
- Apply protective measures and cleaning practices while working on the home
- Recognize signals of compromised pressure and thermal boundaries
- Characterize common air sealing tools, materials, and material characteristics
- Categorize air sealing opportunities and common leakage sites
- Explain basic blower door functionality to verify an effective air barrier has been established
- Describe treatment options for walk-up attics and other unique air sealing details

Certification:

- Certification of Completion

Air Sealing & Dense Pack Wall Insulation

Proper air sealing and insulation techniques work hand in hand to achieve a high degree of energy efficiency. In this two-day class we will examine proper air sealing techniques by outlining not only the need to perform quality air sealing but what materials to use and where to use them. This course will also examine how to properly dense pack exterior walls with cellulose insulation. This technique combines the best of both worlds in obtaining air sealing and a higher R-value of wall insulation at the same time. Proper machine set-up, probing walls and tubing techniques will be covered so that the maximum R-value in the exterior walls can be obtained. (BPI CEU: 6.5)

Learning objectives:

- Gain a deeper understanding of the need for proper air sealing
- Learn proper air sealing techniques as well as materials to use
- Learn proper dense pack wall insulation methods
- Gain an understanding of the rules governing WAP training
- Review Michigan's Change Vision for WAP
- Examine Michigan's goal of advanced Weatherization performance

Certification:

- Certification of Completion

Combustion Appliance Zone Diagnostics Training

This one-day class is designed for Auditors and Technicians who are responsible for performing CAZ pressure diagnostics and affecting repairs. We have long been familiar with the term "worst case" draft testing and H&S has always been our first consideration when performing CAZ pressure testing. While H&S is our primary concern, there are also building durability, comfort, IAQ and efficiency issues that we must consider. In this class we will discuss concepts and root causes of pressure issues along with CAZ testing procedures and equipment. From a more complete perspective, participants will then be challenged to interpret diagnostic test results and identify appropriate repairs to help ensure that the building works in all respects.

Learning objectives:

- Define the concepts behind how structural and mechanical systems interact in residential buildings
- Learn how pressure imbalances caused by these interactions create problems with health & safety, building durability, comfort, and energy efficiency
- Review all Auditor responsibilities regarding CAZ pressure testing and operational testing of appliances under "worst case" conditions
- Explore how review of the CAZ pressure testing results can help drive work scope development and remediation of problems

Certification:

- Certification of Completion

Dense Pack Insulation

Dense Pack Insulation is an in depth, one day, course intended to cover the principles and theory behind dense pack sidewall insulation. We will examine proper equipment set up and maintenance along with the necessary tools needed for optimal uniformity, target density, workflow and production. Lastly, we will explore the guidance, best practices, and filling techniques related to dense pack insulation.

Learning Objectives:

- Identify access to specific dense pack insulation work areas.
- Apply protective measures and cleaning practices while working on the home.
- Explain the importance of achieving uniform density within the cavity.
- Select necessary dense pack tools, and materials (including safety equipment).
- Identify insulation equipment setup and maintenance protocols.
- Reference dense pack related guidance and techniques.
- Demonstrate dense pack filling techniques.
- Illustrate methods to verify proper density has been achieved.

Certification:

- Certification of Completion

Foundation Insulation

Foundation Insulation is an in-depth, one day course that covers techniques and best practices for insulating foundations in the Weatherization Assistance Program. We will cover characteristics of foundations and how best to approach these sometimes-challenging installations. Included will be proper vapor barrier insulation in foundations, air sealing techniques for foundations, duct sealing techniques for foundations, worker safety, standards and acceptable insulation application.

Learning Objectives:

- Recognize the importance of air sealing prior to insulation
- Locate and verify access to specific work areas
- Identify guidance and standards for acceptable installations
- Organize equipment, tools, and materials necessary for proper installation
- Demonstrate installation of vapor barrier, insulation, and air sealing measures

Certification:

- Certification of Completion

Mechanical Systems Inspection for Auditors (MSIA)

This two-day class is intended to provide an introductory look at mechanical equipment found in Weatherization homes. The purpose is to provide a knowledge base to familiarize Auditors with equipment components and operation. Participants will be exposed to different system types, operational characteristics, sequences of operation, and basic testing procedures. It is intended that students will gain the skills necessary to provide a general visual inspection. This is an introductory class to mechanical systems with a focus on Auditor responsibilities as part of the Weatherization Audit process.

Learning objectives:

- Be exposed to components and operational characteristics of residential heating equipment
- Learn design characteristics and sequences of operation
- Review all Auditor responsibilities regarding operational testing of appliances
- Discuss installation concern

Certification:

- Certification of Completion

NEAT/MHEA Data Entry

This 1-day class will review the required information needing to be entered into the database for running a measures report on the home. To assist in data entry, we will review and create User Defined Measures, NEAT Insulation Types, some Library Measures pricing, Itemized Costs, Incidental Repairs and Mandatory Measures before engaging in tab-by-tab data entry in the actual audit. Participants should bring a laptop or other appropriate device with Wx Assistant pre-loaded and a copy of your current database.

NEAT/MHEA Database Setup and Maintenance

This 1-day introductory class will help users in the setup and maintenance of their current Wx Assistant database. We will show how to create and link to new databases going forward along with a tab-by-tab review of the necessary information required to populate the database with current information, measures and pricing. We will focus on Setup and Supply Library information and particularly, Fuel Cost Libraries, NEAT Insulation Types, and User Defined Measures. Participants should bring a laptop or other appropriate device with Wx Assistant pre-loaded and a copy of your current database.

Venting & Combustion Air

For proper and predictable operation, the importance of having a combustion appliance vent system that is “at least” code cannot be understated. This one-day class is intended to provide guidance in navigating the National Fire Protection Association (NFPA-54) vent sizing tables and the rules associated with using them. Discussed will be aspects of visual inspection of vent systems for determination of proper venting material and size along with installation concerns. Chimneys and “orphaned” water heaters will be part of this discussion. Class exercises will test your skills in properly sizing vents and vent connectors for Category 1 combustion appliances.

Having the proper amount of combustion air in the combustion appliance zone (CAZ) is critical to the safe operation and proper venting of combustion appliances. Necessarily, this class will include a review of combustion air requirements and NFPA approved resolutions to address deficiencies. Also discussed will be engineered combustion air devices. Class exercises will test your skills in combustion air calculations.

Learning Objectives

- Provide a basic visual inspection of existing vent systems
- Follow NFPA 54 guidelines to properly size vents and vent connectors
- Review installation concerns
- Calculate combustion air requirements
- Provide Code directed guidance for resolution of problems

Certification:

- Certification of Completion

Weatherization 101

Weatherization 101 is a one-day course that covers principles and theories of building science, as well as basic techniques and strategies used in weatherization. We will be focusing on the house as a system concept and discuss how the measures we install effect the home's pressure, moisture, temperature, and the overall "Big Picture" as it relates to building science. Further, we will cover the importance of understanding baseload, ventilation, weatherproofing and mechanical measures, as well as preforming

Learning Objectives:

- Discuss possible interactions of different home elements
- Recognize possible effects of changes made during weatherization
- Locate and recognize thermal and pressure boundaries
- Describe how driving forces effect home performance
- Illustrate the link between air leakage, energy waste and moisture problems
- Explain the principle behind the blower door and other diagnostic tools
- Convey the need for ventilation and the related options and guidelines
- Define need for weatherproofing any created building penetrations
- Identify the importance of combustion safety throughout the work scope
- Outline the impact of baseloads in regard to energy saving potential
- Identify program fenestration repair and replacement perspective

Certification:

- Certification of Completion

Zone Pressure Diagnostic Training

This one-day class is intended to provide participants with a better understanding of building operational characteristics and show how zone pressure diagnostics (ZPD) can be a valuable aid in evaluation of a structure. Pressure diagnostics can help in determining primary and secondary air boundary locations, connection of interior to exterior spaces – including garages, target leakage areas for air sealing, pressure imbalances in the building, or even duct leakage. They are also valuable from a Quality Control perspective and can offer validation to workers that progress is being made. This is important because air leakage and what we do about it can have a huge impact on indoor air quality (IAQ) and health and safety (H&S), building durability, comfort, and energy savings. The goal is to show that ZPD testing is easy to do and a valuable addition to your toolbox.

Learning objectives:

- Estimate connectivity between interior and exterior zones
- Determine the alignment of pressure and thermal boundaries
- Estimate hole size ratios in primary versus secondary pressure boundaries
- Interpret pressure pan readings for duct sealing opportunities
- Identify main body, duct zone and room pressure imbalances due to air-handler operation
- Interpret zone pressure diagnostic test results
- Use Advanced zone pressure diagnostics for more specific information for leakage sites
- Assess the potential for health and safety, building durability, comfort or efficiency issues

Certification:

- Certification of Completion

SPECIFIC TECHNICAL TRAINING

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

○ Safety Devices ○ Ventilation and Indoor Air Quality ▪ American Society of Heating Refrigeration and Air-Conditioning Engineers (ASHRAE) ○ Window Repair, Door Repair ○ Worker Safety ▪ OSHA ○ Additional topics as described in Health & Safety Plan • Client Education (training workers to conduct client education). Examples include: ○ Energy Savings strategies ○ Program-specific information. Examples include: ▪ What to expect ▪ Additional resources ○ Health & Safety issues
Focus Areas: • Specific Training will be developed as needed to enhance the knowledge and improve performance. Many of the specific trainings that will be utilized in Michigan will help to introduce topics at a basic level to help prepare weatherization professionals to attend comprehensive advanced courses. • Evaluating performance after comprehensive training to determine if other specific training needs could be helpful • Requirements for Weatherization Assistance Program as a base knowledge ○ Health and Safety Training ○ OSHA 10 ○ LSW/LRRP • Implement transition plan to convert to WA v10 (NEAT/MHEA)(Timeline TBD) • Customized required training as needed • MDHHS-BCAEO will require training as necessary based upon DOE monitoring results, MDHHS-BCAEO monitoring results, and feedback provided from WAP stakeholders. • MDHHS-BCAEO expects all weatherization professionals to attend all state required training during the year to ensure updates occur in the field. Updates are provided at the two annual conferences sponsored by MDHHS-BCAEO. • All weatherization professionals must demonstrate outcomes from training in the field. Additional training may be required as noted in monitoring reports for weak work practices and lack of outcome achievement.

Below are the base offerings for the existing Michigan Weatherization Assistance Program Network:

Course Offering	Estimated Number of Completed Trainings
Lead Safe Work (LSW)	8
Health & Safety Training	10
Client Education	4
Energy Auditor: Norms & Best Practices	2

Course Catalog for Specific Training:

Lead Safe Work (LSW)

The intent of this 1-day class is to familiarize crews with safeguards that must be taken when dealing with lead in Weatherization. Lead is poisonous and may be present in older homes. Weatherization professionals working on these homes must be aware of the hazards of lead. Use of lead-safe weatherization is critical to protecting the health of workers, clients and their families. 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.

Learning Objectives:

- Discuss what lead is and where it can be found
- Describe lead paint hazards
- Summarize compliance requirements of DOE, EPA and OSHA
- Interpret methods of containment
- Indicate lead testing methods

Requirements by Roles: Different roles in Weatherization have different requirements and options for LSW or LRRP training and certification.

- 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
- Individuals in these roles must receive either LSW or LRRP training and must follow EPA rules.

Class:

- Lead Safe Work (LSW) online or in person through MiTEC

Certification:

LSW Certification of Completion
Regular Training and Updates:

- All required training/certification (by role as noted above) must be completed within 180 days of the date they are hired.

EPA Lead Renovation, Repair and Painting (LRRP)

The US Environmental Protection Agency (EPA) produced the Lead Renovation, Repair and Painting Program that requires each job have an EPA Certified Renovator on-site during job set up and completion. Weatherization 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. The certified person is responsible for documenting that all work is done in a lead safe manner. LRRP Certification, in general, covers the following activities that disturbs in pre-1978 housing and child-occupied facilities:

- Remodeling and repair/maintenance
- Electrical work
- Plumbing
- Painting preparation
- Carpentry
- Window replacement

Requirements by Roles: Different roles in Weatherization have different requirements for LSW or LRRP training and certification.

- 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
  Individuals in these roles must receive either LSW or LRRP training and must follow EPA rules.
- Shell contractor companies and agencies that employ crews must hold the EPA firm license in addition to requirements for individuals.

Class:

- Lead Renovation, Repair, and Painting (LRRP) by an EPA Certified Renovator

Certification:

- Individuals: LRRP Certification
- Contractors/Agencies: EPA firm license

Regular Training and Updates:

- All required training/certification (by role as noted above) must be completed within 180 days of the date they are hired.
- Maintain per EPA guidelines.

Health & Safety Training

The intent of this 1-day training is to provide attendees with weatherization policy regarding mold and moisture; knowledge to recognize the causes of existing mold growth; and the importance of not creating conditions that could promote new mold growth. We will also look at moisture concerns, moisture control measures, the need for healthy indoor air quality, pollutant sources, client education and health effects of mold on occupants. The curriculum for the Health & Safety Training has been aligned with WPN 17-7 and the associated Table of Issues. Weatherization students will receive specialized training in the recognition of conditions that promote mold growth and other Health & Safety issues they may encounter in their weatherization work and how best to prevent creating new mold or worsening conditions.

Learning Objectives:

- Discuss weatherization mold policy
- Summarize health concerns of molds
- List conditions that promote mold growth
- Express the role moisture plays mold growth and IAQ.
- Indicate pollutant remediation techniques.
- Associate the impact of occupant behavior on IAQ.
- Recognize possible needs for mechanical ventilation

Requirements by Roles:

- Individuals required to attend the Health and Safety Class 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.
- Energy Auditors and Quality Control Inspectors
  Individuals in these roles must receive Health & Safety Training.
- Mechanical, Electrical and Plumbing Contractors
  Individuals in these roles are not required to receive Health & Safety Training.
- Shell Contractors and Crews
  Individuals in these roles must receive Health & Safety Training.

Class:

- Health and Safety Training Class by MiTEC offers the following topics:
  - Air conditioning and heating systems
  - Asbestos
  - Biologicals and unsanitary conditions
  - Building structure and roofing
  - Code compliance
  - Combustion gases
  - Electrical
  - Formaldehyde, volatile organic compounds (vocs), flammable liquids, and other air pollutants
  - Fuel leaks
  - Gas range/ovens
  - Hazardous materials disposal
  - Injury prevention of occupants and weatherization workers
  - Lead based paint
  - EPA's lead renovation, repair & painting program (rrp) mold/moisture
  - Pests
  - Radon
  - Safety devices
  - Ventilation and indoor air quality
  - American society of heating refrigeration and air-conditioning engineers (ASHRAE)
  - Window repair, door repair
  - Worker safety
  - OSHA
  - Additional topics from Michigan's health & safety plan

Certification:

- Certification of Completion

Regular Training and Updates:

- All required training/certification (by role as noted above) must be completed to work independently in the field.
- All required training/certification (by role as noted above) must be completed within 180 days of the date they are hired.

OSHA-10 Hour Training

Occupational Safety and Health Administration 10-hour completion certification will ensure basic work safe environment practices are applied and how to avoid workplace hazards by weatherization workers.

Requirements by Roles:

- 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.

- Weatherization Agency Crew Leaders are no longer required to take the OSHA 30-hour course

Classes:

- 10-hour Occupational Safety and Health training course provided by Occupational Safety and Health Administration qualified instructor.
- OSHA 30-hour course is not required for individuals but can be used as a substitute for the OSHA 10-hour course to meet the requirement.

Certification:

- OSHA 10-Hour Certification of Completion

Regular Training and Updates:

- All required training/certification (by role as noted above) must be completed to work independently in the field.
- New staff (Energy Auditors/QC Inspectors and agency crews/contractors) are required to attend training within 180 days of the date they are hired.

Client Education

Occupants are a vital part of the “House as a System” where energy efficiency is concerned. Client education is a vital component on every home weatherized. Clients be informed on how to make the best use of the new systems and upgrades. They also can learn how personal actions can improve or hinder a building’s comfort and performance. Currently, each local agency develops their own client handouts. A team at the state level will review, compile, update, and create new material for a statewide client education program.

Class: (Topics for weatherization professionals working with clients conducted by MiTEC)

- Air Conditioning and heating systems
- Asbestos
- Biologicals and unsanitary conditions
- Building structure and roofing
- Code compliance
- Combustion gases
- Electrical
- Formaldehyde, volatile organic compounds (vocs), flammable liquids, and other air pollutants
- Fuel leaks
- Gas range/ovens
- Hazardous materials disposal
- Injury prevention of occupants and weatherization workers
- Lead based paint
- EPA's lead renovation, repair & painting program (rrp) mold/moisture
- Pests
- Radon
- Safety devices
- Ventilation and indoor air quality (ASHRAE)
- Window repair, door repair
- Worker safety (OSHA)
- Additional topics as described in Michigan's health & safety plan

Certification:

- Certification of Completion

Regular Training and Updates:

- Available to all Weatherization Professionals will be ready in PY 2022.

Energy Auditor: Norms & Best Practices

This class is intended to provide participants with the knowledge of the steps involved in the process of becoming an Energy Auditor that achieves high energy savings in the DOE National Weatherization Program. In the classroom, we will discuss theory, concepts, inspection, and the audit process from beginning to end. Participants are expected to have a knowledge base in place which will allow a viable transition from knowing to implementation. The goal of this class is to take information learned in other classes and in the field and fine tune the approach. There are recommended prerequisites before taking this class.

Prerequisites:

- Successful completion of Weatherization Installer or Crew Leader courses or equivalent OR
- Currently hold a Building Analyst / Energy Auditor certification or have been working as an energy auditor OR
- Have requisite experience in the energy conservation field

Learning objectives:

- Recognize apply best practices in the role of the Energy Auditor in the DOE Weatherization Program
- Discuss best practices in managing documentation required as part of the audit process
- Learn how to evaluate energy efficiency in multiple jobs
- Formulate a viable work scope for a home
- Validate work scope recommendations

State of Michigan Energy Auditor Training

The State of Michigan Energy Auditor certification is offered by MiTEC to ensure energy audits can be completed with knowledgeable individuals until the HEP Energy Auditor Certification can be achieved. MiTEC has several specific training classes that can be helpful for students. In addition, MiTEC can provide custom training as necessary. The SOM Energy Auditor certification demonstrates competency through training and an onsite field exam, and work experience prerequisites. Once certified, an individual will be able to conduct energy audits for 18 months while working towards achieving the HEP Energy Auditor Certification through BPI.

MDHHS-BCAEO will focus on standardizing material, resource book, brochures, literature, videos, forms/checklists, and internet links to help clients understand the importance of maintaining the work done by weatherization crews. A statewide virtual repository will be created for the subgrantees to use in their client education events as well as with each client.

MDHHS-BCAEO will hire 2 Weatherization Coordinators to develop the resource library and media for client education in PY 2022. In addition to the print and digital material, the team will also retrofit mobile trailers and training sites with hands on labs and exhibits for client education training.

Research and the development of client specific material began in PY 2021 and will continue in PY2022 that aligns with the health and safety topics in WPN 22-7. Material will also ensure the most up-to-date information is used in the material to provide clients with energy savings tips and strategies, how to maintain weatherization measures, and how to reduce energy costs. The material and media will encourage the client to take action in maintaining their energy efficiency.

The statewide digital library of resources, as well as print copies, will also contain methods and the appropriate time in teaching, informing, and sharing information with the client.

MDHHS-BCAEO will continue to distribute the client education material during client and contractor outreach events.

CONFERENCES. EXAMPLES INCLUDE:

- **ENERGY OUTWEST**
- **BUILDING PERFORMANCE ASSOCIATION**
- **NATIONAL ASSOCIATION FOR STATE AND COMMUNITY SERVICE PROVIDERS**
- **COMMUNITY ACTION PARTNERSHIP**

MDHHS-BCAEO will participate in the following conferences as needed. Michigan State employees will tentatively be able to travel in PY22 so long as pandemic conditions do not worsen. Virtual learning opportunities are being used in place of face-to-face travel as needed. MDHHS-BCAEO makes sure a staff person attends conferences that DOE will be presenting.

Below are the Conference MDHHS-BCAEO attends and regularly speaks at:

- Energy OutWest
- Building Performance Association
- National Association for State and Community Service Programs
- Community Action Partnership

OTHER, PLEASE SPECIFY:

Michigan also holds an annual fall Weatherization Technical Conference.

MDHHS-BCAEO attends board meetings and other influential meetings that keep us engaged in the national program. Staff holds board positions with the following entities:

- Energy OutWest
- NASCSP
- ASHRAE
- ACCA
- NFPA
- National Weatherization Training Center Consortium

5.0 – TECHNICAL ASSISTANCE

DESCRIBE THE TECHNICAL ASSISTANCE ACTIVITIES INCLUDED IN THE T&TA BUDGET CATEGORY.

PROGRAMMATIC/ADMINISTRATION SUPPORT

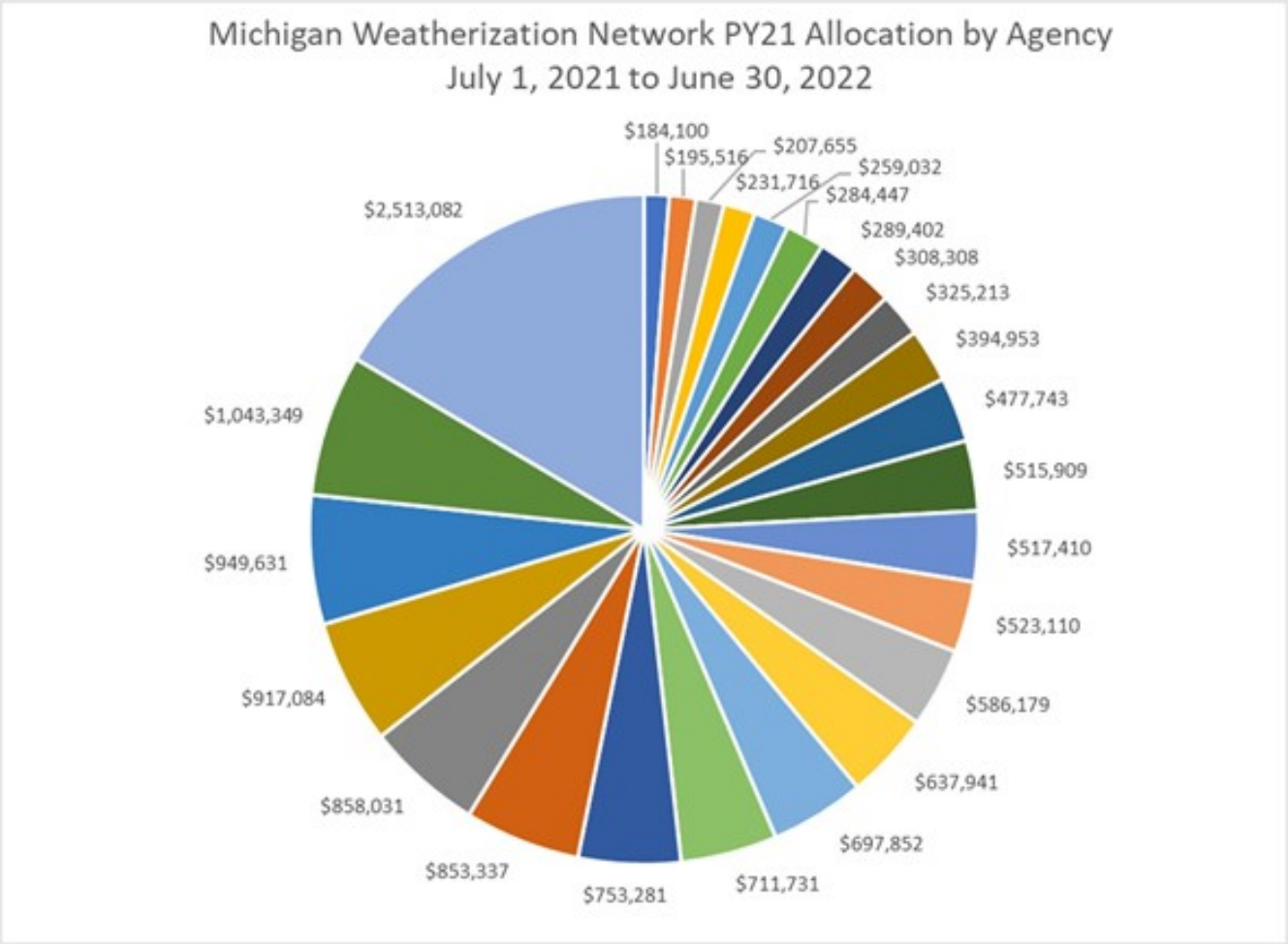
Current Data Analysis shows:

The Michigan Weatherization Program funds 25 Community Action Agencies administering the Weatherization Assistance Program (Below is a summary of the size of the network and a pie chart of new PY 2022 Allocations by each agency)

CAA Funding Category by % of Allocation	#CAAs in Category	Allocation sum of funding (PY21)	Allocation Average in Category
1% Agencies	3	$587,271	$195,757
2% Agencies	6	$1,698,118	$283,020
3% Agencies	5	$2,429,125	$485,825
4% Agencies	2	$1,224,120	$612,060
5% Agencies	3	$2,162,865	$720,955
6% Agencies	4	$3,578,083	$894,521
7% Agencies	1	$1,043,349	$1,043,349
16% Agencies	1	$2,513,082	$2,513,082

The weatherization network is made up of 60% of small agencies with 35% of the total allocation. The extra- large agency, which is 1 of the 25, is allocated 16% of the funding. This setup is challenging in terms of providing technical assistance. The data shows that small to some medium agencies show signs of instability when one key weatherization staff person or contractor leaves the program. All agencies are experiencing difficulties in expanding their operations. In addition, over the past 3 to 5 years the majority of the weatherization managers at the agencies are new to their role. Approximately, 10 to 12 have 3 to 4 years of experience and about 5 to 7 have 2 to 3 years of

Agency Size	Number of CAAs	Allocation Range	Allocation Total for Group	Allocation Total for Group Percent
Small	15	Under $600,000 Allocation	$5,300,692	35%
Medium	9	Between $600,000 and a low $1 m)	$7,422,238	49%
Extra Large	1	Over $2.5 m	$2,513,082	16%
	25		$15,236,012	100%



Conditions for low production and/or delays include:

- COVID-19 Pandemic
  - Client's fear
  - Contractor and Crew exposure or positive results
- Lack of supplies or prolonged delays in supplies to complete measures
- Low number of contractors interested in working for the weatherization assistance program
  - Contractor demand for work in other fields is very high
  - Too many regulations
  - Difficulties in RFP process
  - Slow payments
  - Low pay due to cost restrictions from SIR and ACPU rules
- Low number of client applications
- High costs and limited supply for materials

Feedback from the WAP network, WAP Quality Assurance Monitoring Reports, and Financial/Programmatic Monitoring Reports assists in the development of the training needs. The information from past monitoring reports, weatherization leadership meetings, surveys, and other sources show that the following technical assistance is needed in the program and administrative management:

- Programmatic Issues that need additional technical assistance
  - Income Eligibility
  - Program Management
  - Statewide Database: FACSPro
  - Financial Management
    - Procurement
    - Inventory
  - Rebuilding a weatherization program at the local level

Rebuilding, Reinventing, and/or Revitalization of the local Weatherization Assistance Program Training:

When a subgrantee needs assistance to rebuild, reinvent, and/or revitalize the local program, MDHHS-BCAEO will provide assistance. In certain situations, when the subgrantee has developed a quality improvement plan to correct performance issues in both their weatherization management and technical portion of the program, MDHHS-BCAEO will provide a weatherization consultant, coach, or instructor for technical assistance as well as a strong training plan.

TECHNICAL SUPPORT

Technical Support is conducted in a variety of ways:

- Subgrantees email our main email address with a request for help
- Subgrantees call for assistance
- Subgrantees can make a request specifically to MiTEC for field training. The instructions are found on the MiTEC website
- During quality assurance monitoring and/or programmatic/financial monitoring, MDHHS-BCAEO staff will provide or identify technical assistance

The top items discussed with MDHHS-BCAEO staff is:

- Mobile home measures
- Air Sealing
- Insulation
- Health and Safety issues
- NEAT/MHEA Setup Libraries
- Field Guide Interpretation

HEALTH & SAFETY SUPPORT ACTIVITIES

The MDHHS-BCAEO and MiTEC support Health and Safety activities in many ways. The MDHHS-BCAEO Technical monitors are available to assist subgrantees as questions and uncertain situations arise. Examples of guidance provided by the monitors range from defining friable asbestos, to addressing vermiculite in the attic, to moisture issues, to data entry related to ASHRAE 62.2 calculations, to interpreting policy and regulations. MiTEC staff are available to provide guidance on proper Health and Safety measure installations. MiTEC staff answer questions related to items such as ASHRAE 62.2 installations, LSW methods, vapor barrier installations, adding ventilation, and building tightness to name a few.

MONITORING

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

Training & Technical Assistance Budget Breakdown

Monitoring	$287,303	9%
Training	$2,935,229	91%
Total	$3,222,532	100%

OTHER, PLEASE SPECIFY

DESCRIBE OTHER TECHNICAL ASSISTANCE ACTIVITIES HERE

6.0 CLIENT EDUCATION

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

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

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

Client education is required for all eligible households. Documentation is placed in the client file and the other copy remains with the client for future reference. All Energy Auditors and QCIs are required to complete client education training throughout the Weatherization process. They are to develop skills for client interaction allowing them to explain the changes in the home, post-weatherization. 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.

Michigan has developed a small statewide committee to pull resources, ideas, and best practices into a network strategy for consistent client education and increased weatherization knowledge. A statewide campaign is being developed that will include radio broadcast, social media, and regional event for clients and contractors. The goal is to generate more interest in weatherization, increase the number of applications, increase awareness on energy efficiency and conservation efforts, and increase the number of weatherization professionals in the program.

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.

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

- 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.

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

- Notify the applicant of the eligibility determination.

- Ask the applicant to prepare for the audit by:

    - Making a list of energy questions and concerns
    - Making the attic, basement, and crawl space accessible
    - Making the perimeter accessible
    - Securing pets
    - 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.

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

- 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.

- Complete the audit.

- Summarize the results of the audit for the client.

- Explain the nature of the work that may be done on the home.
  If the client is actively participating, agree on three energy action steps for the client to do.
  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.
Introduce the contractor or crew to the client.

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

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

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

- 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:

- Ask the client about the weatherization work.

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

- Inspect the work.

- Follow up on referrals.

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

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

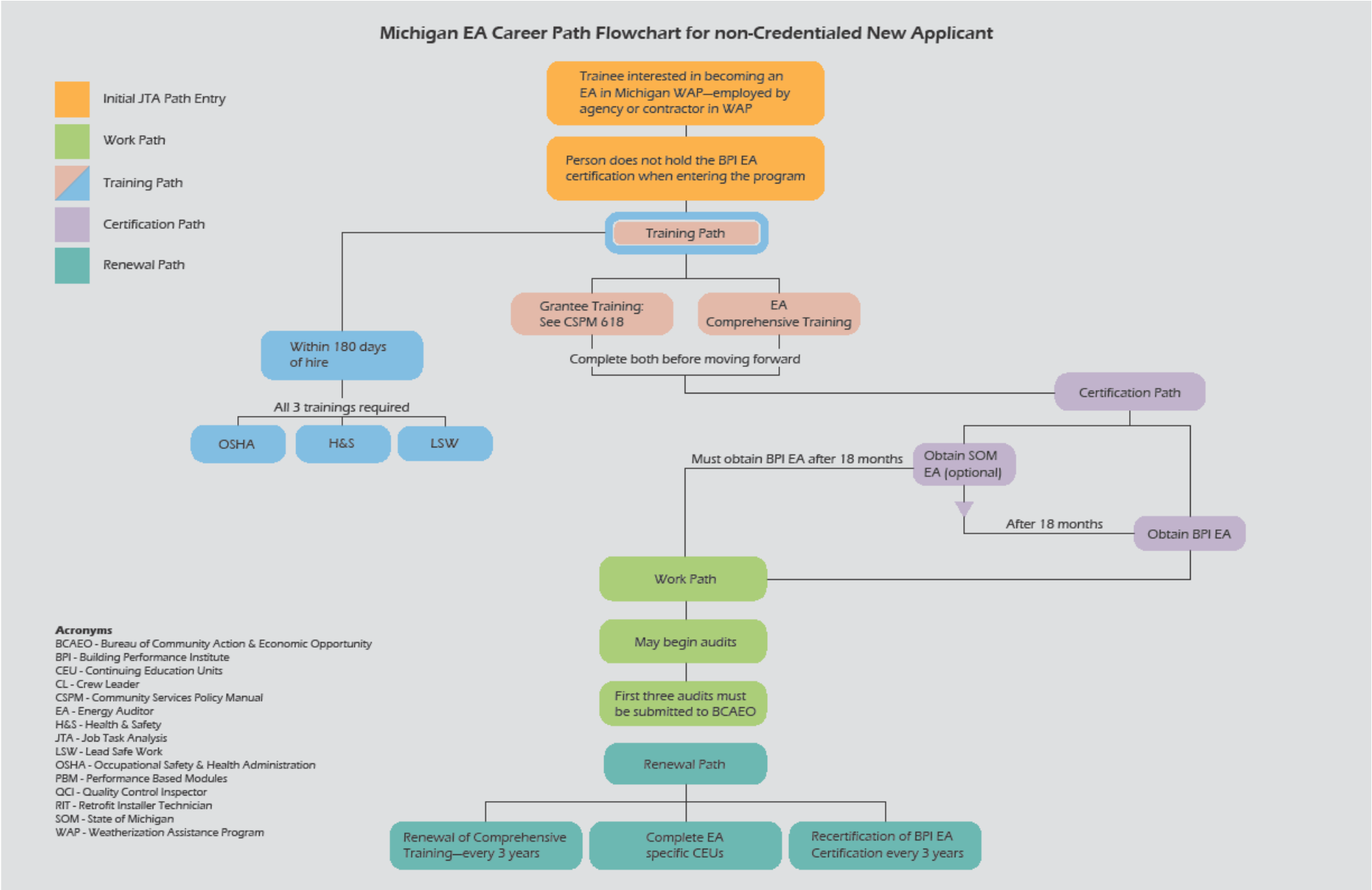
- A generic letter introducing the Weatherization Assistance Program. See page 5.
- An illustrated step-by-step energy savings guide. This could be distributed with the letter of introduction.
- The client plan of action (required to be retained in the client file) and examples of energy action steps and the potential savings. See page 6 and 7.
- A list of weatherization measures, which includes information relative to the contractor, if applicable. See page 9.
- A generic letter to be provided to the client after the weatherization measures are completed. See page 10.
- An illustrated guide for maintaining the weatherization measures installed.
- A follow up survey.

Client education activities regarding H&S issues as indicated in WPN 17-7
○ Air Conditioning and Heating Systems ○ Asbestos ○ Biologicals and Unsanitary Conditions ○ Building Structure and Roofing ○ Code Compliance ○ Combustion Gases ○ Electrical ○ Formaldehyde, Volatile Organic Compounds (VOCs), Flammable Liquids, and other Air Pollutants ○ Fuel Leaks ○ Gas Range/Ovens ○ Hazardous Materials Disposal ○ Injury Prevention of Occupants and Weatherization Workers ○ Lead Based Paint ○ EPA's Lead Renovation, Repair & Painting Program (RRP) Mold/Moisture ○ Pests ○ Radon ○ Safety Devices ○ Ventilation and Indoor Air Quality ▪ American Society of Heating Refrigeration and Air-Conditioning Engineers (ASHRAE) ○ Window Repair, Door Repair ○ Worker Safety ▪ OSHA Additional topics as described in Health & Safety Plan
Currently, each local agency officially develops their own client handouts. MDHHS-BCAEO has focused on standardizing material, resource book, brochures, literature, videos, forms/checklists, and internet links to help clients understand the importance of maintaining the work done by weatherization crews. During PY22, all standardization will be complete and agencies will be encouraged to utilize BCAEO created materials. A statewide virtual repository has been created for the subgrantees to use in their client education events as well as with each client. MDHHS-BCAEO has 3 Weatherization Coordinators who work in the client education area. One is a former subgrantee Weatherization manager. One is working to obtain QCI credentials and has extensive graphic design experience. Another is seeking technical experience to obtain QCI credentials and is training on driving and presenting on our Weatherization training trailers. This team will develop materials for the resource library, attend events targeting our various outreach groups (general public, potential contractors, potential clients and workforce development individuals) where they will focus on expansion, and updating the MDHHS-BCAEO web presence. Research and the development of client specific material will be completed in PY 2022 that aligns with the health and safety topics in WPN 22-7. Material will also ensure the most up-to-date information is used in the material to provide clients with energy savings tips and strategies, how to maintain weatherization measures, and how to reduce energy costs. The material and media will encourage the client to take action in maintaining their energy efficiency.

The statewide digital library of resources, as well as print copies, will also contain methods and the appropriate time in teaching, informing, and sharing information with the client.

MDHHS-BCAEO will pilot the client education material in PY 2022 during client and contractor outreach events.

Attachment to 618 – JTA Career Path Flow Charts



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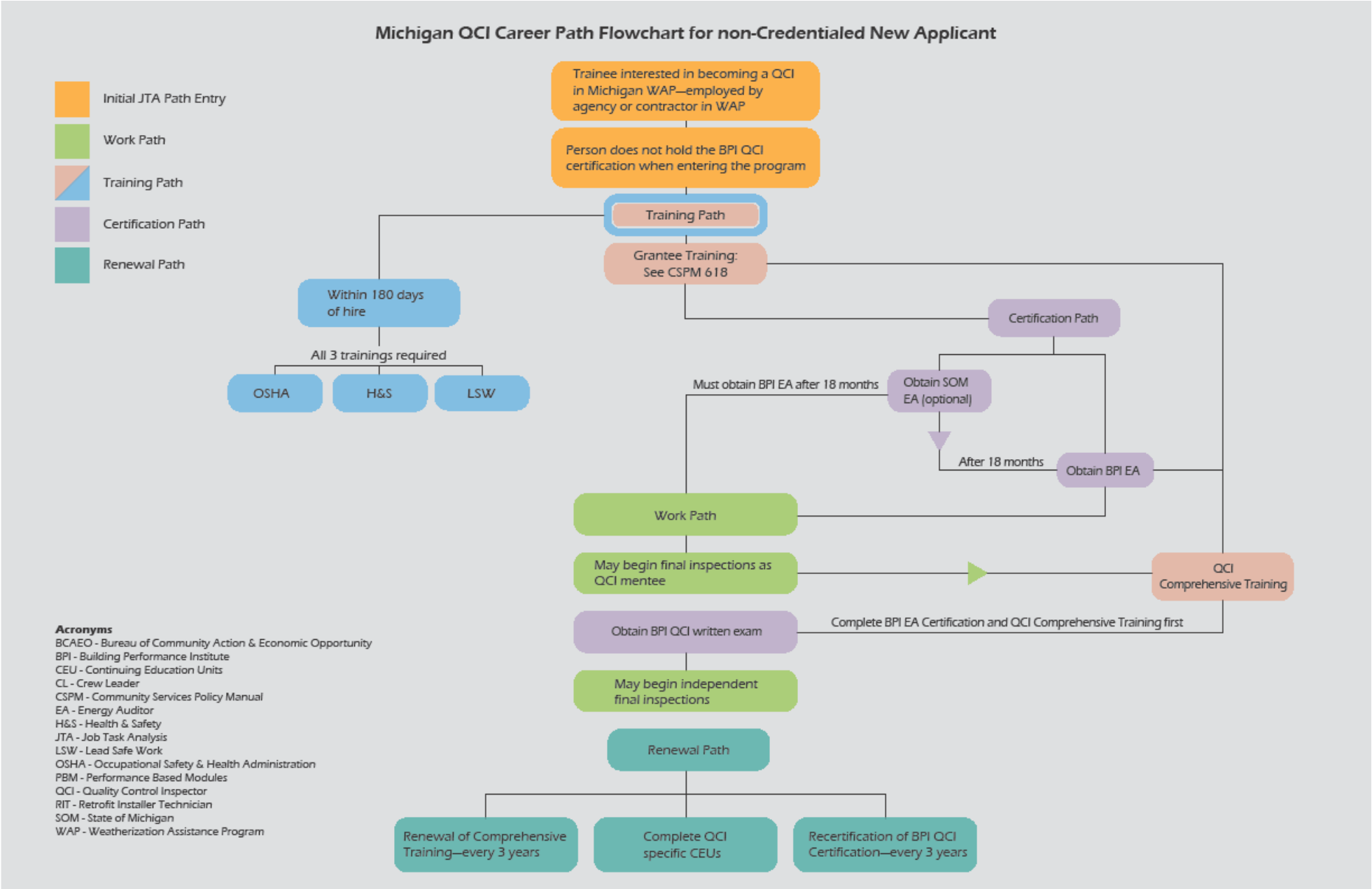

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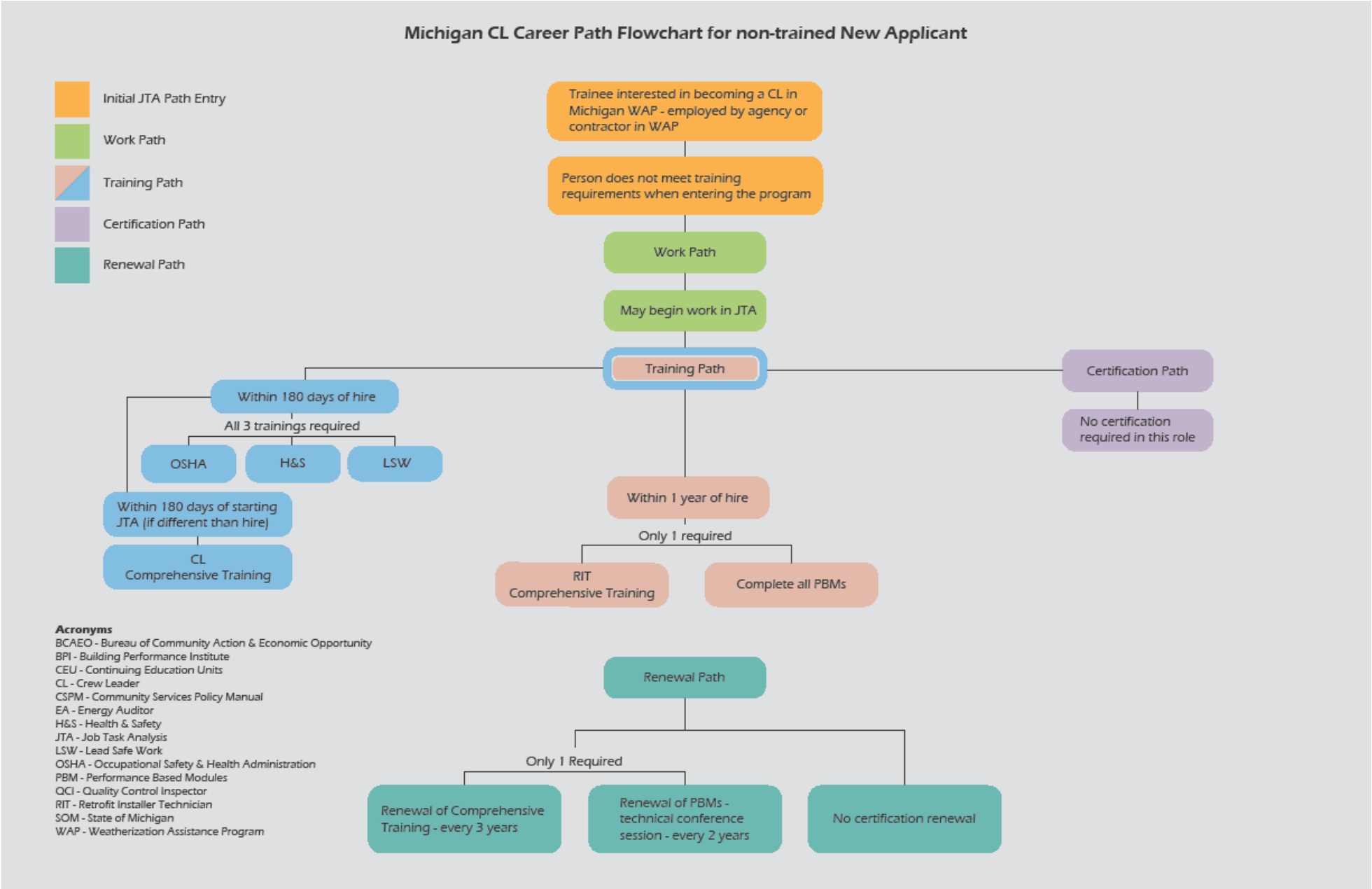

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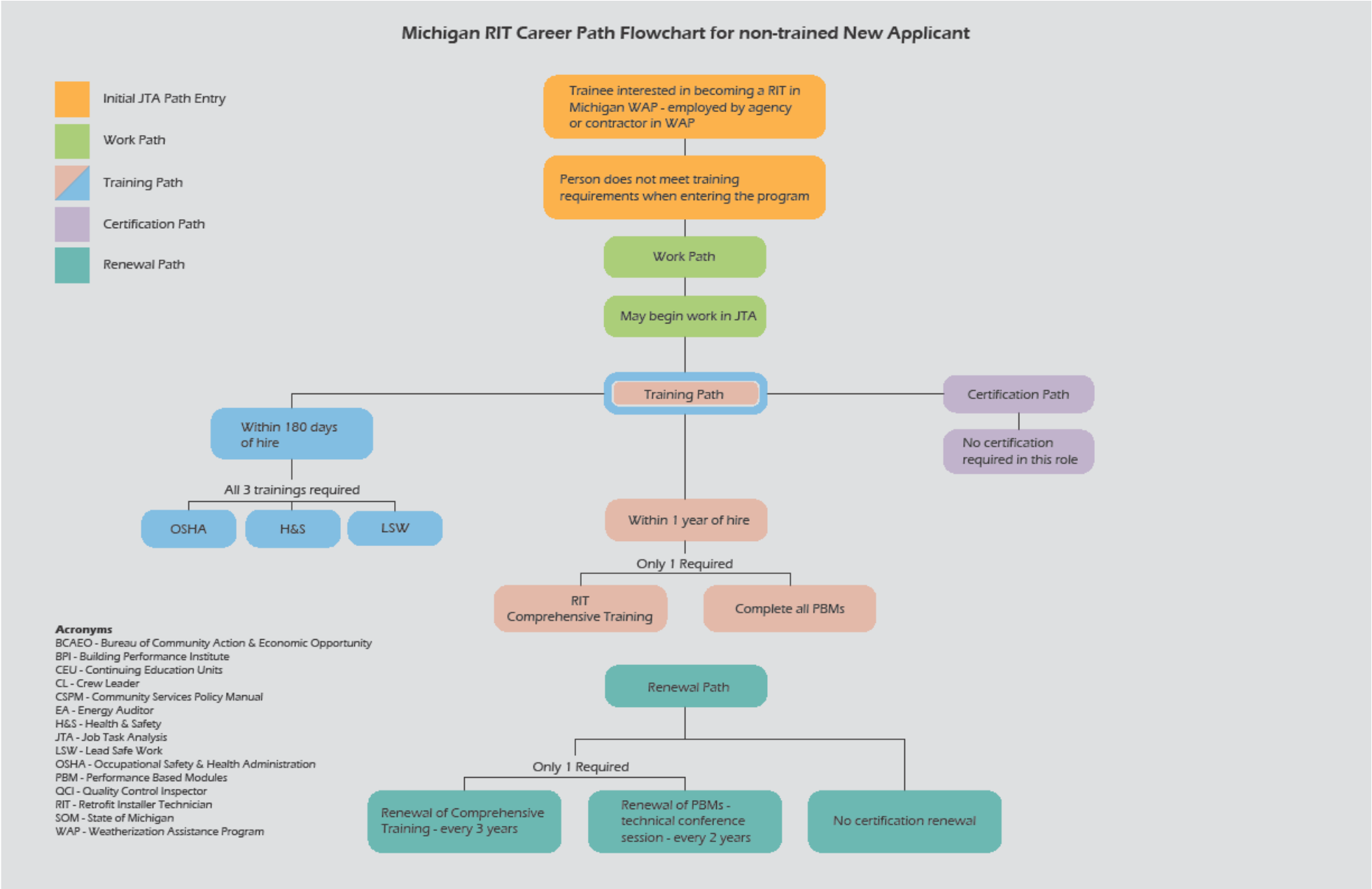

Attachment to 619 – Michigan SHPO WAP Exemption Guide

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 <u>not</u> 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 <u>not</u> 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 <u>do require</u> SHPO review, including special consideration for potential archaeological impacts.

<u>General Exemptions</u>:

Energy Audits and Feasibility Studies

Weatherization of mobile homes and trailers

Appliance replacement

<u>Exempted Exterior Work</u>:

Repairing or replacing in-kind existing driveways, parking areas, walkways, etc.

Excavating to gain access to existing underground utilities to repair or replace them.

Minor excavating (2-3 cubic feet) to rebuild or install new crawl space access.

Air Sealing

- Caulking/weatherstripping around doors/windows for infiltration/exfiltration issues.

Doors and Windows

- Replacement of existing windows and doors that are not original to the building.

- Replacement of existing original windows and doors when the replacement window or door matches the size, design, proportion, profile and materials of the original and the size of the window or door opening is not altered (enlarged or reduced). Typical vinyl windows with snap-in grids or a grid between glass panes are not appropriate.

- Installing insulated exterior replacement doors where the openings are not altered and they cannot be viewed from the public right-of-way.

- Installation of storm windows or doors and wood screen doors in a manner that does not harm or obscure original historic windows, doors or trim.

Wall Insulation (no spray foam insulation), subject to the following specifications:

- Minor necessary repairs to prepare exterior walls for insulation are exempted provided the repairs match the original surface composite.

- All wall insulation must have an **adequate vapor barrier or vapor retardant** on the warm (heated) side of the wall **or** consist of a **pre-expanded, closed-cell foam** insulation. Multiple coats of interior wall and ceiling paint are sufficient to meet the criteria of a vapor retardant, per the U.S. Dept. of Energy. More information is available at:

http://www.energysavers.gov/your_home/insulation_airsealing/index.cfm/mytopic=11810

- No holes are drilled through original exterior (wood, brick, etc.) siding, or holes have no permanent visible alteration to the finish materials. Any holes drilled for insulation must be finished and returned to condition as close to the original as possible. Access holes in the walls must be patched or plugged with materials that **match the original** (no plastic plugs).

- Access holes may be patched or plugged with plastic plugs where the original siding was replaced with aluminum or vinyl siding prior to the WAP project.

Painting and Siding

- Painting over previously painted exterior surfaces, provided destructive surface preparation treatments, including, but not limited to, water-blasting, sandblasting and chemical removal, are not used.
- Installation or replacement of gutters and downspouts, provided that their color is historically appropriate for the period and style of the property.

- Repair or replacement of original exterior siding provided that new siding matches the original siding in dimension, profile, texture, and material (for example, replacement in-kind).

- Replacement of existing aluminum or vinyl siding.

Roofing

- Flat or shallow pitch roof replacement (shallow pitch is defined as a pitch with a rise-to-run ratio equal to or less than 3" to 12"), with no part of the surface of the roof visible from the ground.

- Repairing or replacing roofing materials that closely match the historic materials and form, or with materials that restore the original feature based on historic evidence, and in a manner that does not alter the roofline.

Solar

- Small Solar Systems, when they are shingle style and on the rear roof of the structure, not viewable from any public right of way.

Interior Work:

Water Conservation Measures (low flow faucets, toilets, shower heads, urinals)

Air Sealing and Insulation

- Sealing air leaks using weather stripping, door sweeps, and caulk and sealing major air leaks associated with bypasses, ducts, air conditioning units, etc.

- Insulation on water heater tanks, pipes and ducts

- Insulation of floors, ceilings, attics, crawl spaces and foundations in a manner that does not harm or damage historic fabric (no spray foam insulation) including:

  Band joist ("Sill Box") insulation

  Floor insulation, provided that historic floor finishes are not damaged

  Attic insulation, including knee-wall insulation, where insulation has been installed previously and when proper ventilation exists

  Repair of minor roof leaks prior to installing attic insulation

  Attic insulation when no prior insulation has been installed, if there is an **adequate vapor barrier or vapor retardant** on the warm (heated) side of the attic floor, such as fiberglass bat. Multiple coats of interior wall and ceiling paint

are sufficient to meet the criteria of a vapor retardant, per the U.S. Dept. of Energy. More information is available at: http://www.energysavers.gov/your_home/insulation_airsealing/index.cfm/mytopic=11810

- Wall insulation (no spray foam insulation), subject to the following specifications:

  Minor necessary repairs to prepare walls for insulation are exempted provided the repairs match the original surface composite.

  All wall insulation must have an **adequate vapor barrier or vapor retardant** on the warm (heated) side of the wall **or** consist of a **pre-expanded, closed-cell foam** insulation. Multiple coats of interior wall and ceiling paint are sufficient to meet the criteria of a vapor retardant, per the U.S. Dept. of Energy. More information is available at: http://www.energysavers.gov/your_home/insulation_airsealing/index.cfm/mytopic=11810

  Interior holes drilled for insulation must be finished and returned to condition as close to the original as possible. Access holes in the walls must be patched or plugged with materials that **match the original**. No decorative plaster may be damaged.

Fire, Smoke or Carbon Dioxide Detectors / Alarms

- Replacement of existing smoke detector or carbon monoxide detector

- Plug-in carbon monoxide detectors

- New installation of hard-wired devices (occupancy sensors, carbon monoxide sensors, programmable thermostats, smoke detectors) as long as it does not include significant spaces (entrances/entry halls/lobbies, areas for public gathering and circulation, primary rooms). If work occurs in a significant space, work shall not damage historic materials or finishes. New wiring/piping/ductwork, etc. shall be concealed.

HVAC Work

- Clean, tune or repair heating and cooling systems, including furnaces, boilers, heat pumps, vented space heaters, wood stoves, central air conditioners, window air conditioners, heat pumps, and evaporative coolers

- HVAC upgrades (Replacement of boilers, furnaces, etc.) that do not require any new venting or a new location, or venting is on the rear of the structure, not visible from any public right of way.

- Install mechanical ventilation, in a manner not visible from the public right of way, to ensure adequate indoor air quality if house is air-sealed to building tightness limit

- Repair or replace vent systems on fossil-fuel-fired heating systems and water heaters to ensure that combustion gasses draft safely to outside if venting is on the rear of the structure, not visible from any public right of way.

- Modify, repair, or replace duct and pipe systems so heating and cooling systems operate efficiently and effectively, including adding return ducts, replace diffusers and registers, replace air filters, install thermostatic radiator controls on steam and hot water heating systems provided:
- The work does not include significant spaces (entrances/entry halls/lobbies, areas for public gathering and circulation, primary rooms). If work occurs in a significant space, work shall not damage historic materials or finishes. New wiring/piping/ductwork, etc. shall be concealed.

- Install programmable thermostats, outdoor reset controls, UL listed energy management systems or building automation systems and other HVAC control systems provided:
- The work does not include significant spaces (entrances/entry halls/lobbies, areas for public gathering and circulation, primary rooms). If work occurs in a significant space, work shall not damage historic materials or finishes. New wiring/piping/ductwork, etc. shall be concealed.

- Ventilating crawl spaces.

- Installing continuous ridge vents covered with ridge shingles or boards, or roof vents, bath and kitchen vents, soffit and frieze board vents, combustion appliance flues, if not located on a primary roof elevation or visible from the public right-of-way.

- Installing foundation vents, if painted or finished to match the existing foundation material.

<u>Lighting and Appliances</u>
- Compact fluorescent light bulbs

- Energy efficient light fixtures (replacement)

- Upgrade exterior lighting (replacement of mercury vapor to metal halide bulbs)

- LED light fixtures & exit signs (replacement)

- New installation of hard-wired devices as long as it does not include significant spaces (entrances/entry halls/lobbies, areas for public gathering and circulation, primary rooms). If work occurs in a significant space, work shall not damage historic materials or finishes. New wiring/piping/ductwork, etc. shall be concealed.

Plumbing and Electrical Work

- Repairing or upgrading electrical or plumbing systems and installing mechanical equipment, in a manner that does not affect the interior or exterior of the building.

- Repair or replace water heaters that do not require any new venting or a new location, or venting is on the rear of the structure, not viewable from any public right of way.

- New installation of hard-wired devices as long as it does not include significant spaces (entrances/entry halls/lobbies, areas for public gathering and circulation, primary rooms). If work occurs in a significant space, work shall not damage historic materials or finishes. New wiring/piping/ductwork, etc. shall be concealed.

SHPO CONSULTATION REQUIRED

The work listed in the above exemption Guidance will require SHPO review if it does not meet the described conditions, as will any work item *not included* in this Consultation List. The following activities may affect historic properties (36 CFR Part 800.5) and will require SHPO Section 106 review if they affect a structure that is fifty (50) years of age or older:

- Any activity that does not meet the work specifications of this exemption Guidance and follow the Secretary of the Interior's *Standards for Rehabilitation*.

- Any activity that is not specified in this exemption Guidance

- White Roofs, Cool Roofs, Green Roofs, Sod or Grass Roofs

- Small solar systems; combined solar/wind demonstration units on government buildings

- Lead-based paint abatement

- Power washing

- Repairing masonry, including repointing and rebuilding chimneys

- Insulating with any Spray Foam Insulation Products

Ground disturbing activity will always require SHPO consultation for archaeological impacts, regardless of the age of structures on the property.

Ground Disturbing Activity

Geothermal Heating Systems

Small-scale concrete slab work, such as placing a slab for a garage or for an addition to an existing building.

Small-scale new construction in urban and residential settings. Examples of small-scale construction would be a detached garage or a shed.

New construction

Any ground disturbing activity in the cities of Saginaw, St. Ignace, Bay City, Mackinaw City and Sault Ste. Marie.

TERMS OF USE

Any work item in the WAP program that is not addressed in this list shall be subject to SHPO consultation. This Guidance only applies to projects funded through the WAP program as part of the DOE's Energy Efficiency and Renewable Energy Program (EERE), part of the American Recovery and Reinvestment Act (ARRA) and set to expire in 2012. The terms of this Guidance shall then terminate unless otherwise agreed to by the SHPO. This Guidance is for the exclusive use of the WAP program and shall not apply to any other federally-funded program. The DHS and its delegated entities are advised to document all points of their decision-making in order to demonstrate proper compliance with Section 106.