

**U.S. Department of Energy  
WEATHERIZATION ASSISTANCE PROGRAM (WAP)  
WEATHERIZATION ANNUAL FILE WORKSHEET**

**(Grant Number: EE0006161, State: MI, Program Year: 2016)**

**IV.1 Subgrantees**

<b>Subgrantee (City)</b>	<b>Planned Funds/Units</b>
Allegan County Resource Development Committee Inc (Allegan)	\$165,718.00 18
Area Community Services Employment and Training Council (Grand Rapids)	\$555,740.00 72
Baraga-Houghton-Keweenaw CAA (Houghton)	\$195,581.00 22
Blue Water Community Action (Port Huron)	\$203,183.00 23
Capital Area Community Services Inc (Lansing)	\$559,142.00 72
Chippewa-Luce-Mackinac Community Action and (Sault Ste Marie)	\$250,430.00 30
Community Action Agency of South Central Michigan (Battle Creek)	\$410,174.00 52
Dickinson-Iron Community Services Agency (Iron Mountain)	\$181,485.00 20
EightCAP Inc (Greenville)	\$642,598.00 83
FiveCAP Inc (Scottville)	\$442,842.00 56
Genesee County CAA (Flint)	\$485,840.00 62
Gogebic-Ontonagon CAA (Bessemer)	\$169,710.00 19
Human Development Commission (Caro)	\$381,668.00 48
Kalamazoo County Human Services Department (Nazareth)	\$304,506.00 37
Macomb County Community Services Agency (Clinton Township)	\$709,109.00 92
Menominee-Delta-Schoolcraft Community Action Agency and (Escanaba)	\$346,006.00 43
Mid Michigan CAA Inc (Farwell)	\$482,728.00 62
Monroe County Opportunity Program (Monroe)	\$489,270.00 62
Northeast Michigan Community Action Agency (Alpena)	\$594,723.00 77
Northwest Michigan Human Services Agency (Traverse City)	\$617,313.00 80
Oakland Livingston Human Services Agency (Pontiac)	\$939,096.00 123
Ottawa County CAA (Holland)	\$238,403.00 28
Saginaw County Community Action Committee (Saginaw)	\$377,524.00 48
Southwest Michigan CAA (Benton Harbor)	\$384,426.00 48

**U.S. Department of Energy  
WEATHERIZATION ASSISTANCE PROGRAM (WAP)  
WEATHERIZATION ANNUAL FILE WORKSHEET**

**(Grant Number: EE0006161, State: MI, Program Year: 2016)**

Washtenaw County Human Services (Ypsilanti)	\$293,877.00 36
Wayne Metropolitan Community Action Agency (Wyandotte)	\$2,416,141.00 321
<b>Total:</b>	<b>\$12,837,233.00</b> <b>1,634</b>

**IV.2 WAP Production Schedule**

Weatherization Plans	Units
Total Units (excluding reweatherized)	1,609
Rewatherized Units	25

Note: Planned units by quarter or category are no longer required, no information required for persons.

Average Unit Costs, Units subject to DOE Project Rules		
<i>VEHICLE &amp; EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)</i>		
A	Total Vehicles & Equipment (\$5,000 or more) Budget	\$0.00
B	Total Units Weatherized	1,609
C	Total Units Rewatherized	25
D	Total Dwelling Units to be Weatherized and Rewatherized (B + C)	1,634
E	Average Vehicles & Equipment Acquisition Cost per Unit (A divided by D)	\$0.00
<i>AVERAGE COST PER DWELLING UNIT (DOE RULES)</i>		
F	Total Funds for Program Operations	\$10,162,136.00
G	Total Dwelling Units to be Weatherized and Rewatherized (from line D)	1,634
H	Average Program Operations Costs per Unit (F divided by G)	\$6,219.18
I	Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$0.00
J	Total Average Cost per Dwelling (H plus I)	\$6,219.18

**IV.3 Energy Savings**

Method used to calculate savings: <input checked="" type="checkbox"/> WAP algorithm <input type="checkbox"/> Other (describe below)			
	Units	Savings Calculator (MBtus)	Energy Savings
This Year Estimate	1634	29.3	47876
Prior Year Estimate	1432	30.5	43676
Prior Year Actual	947	30.5	28884

**Method used to calculate savings description:**

The WAP algorithm that Michigan uses is based on the most recent metaevaluation of the national DOE Weatherization Assistance Program. The report indicates the annual energy savings for gas-heated homes nationwide is estimated to be 29.3 million site BTUs.

The Program Year (PY) 2016 estimate of energy savings for the DOE funding is: (1634 homes x 29.3 million site BTUs per home =) 47876.2 million site BTUs.

Prior year (PY15) savings for DOE base funding estimated at : 1432 x 30.5 million site BTUs per home = 43676 million site BTUs

**U.S. Department of Energy  
WEATHERIZATION ASSISTANCE PROGRAM (WAP)  
WEATHERIZATION ANNUAL FILE WORKSHEET**

**(Grant Number: EE0006161, State: MI, Program Year: 2016)**

**IV.4 DOE-Funded Leveraging Activities**

**IV.5 Policy Advisory Council Members**

Check if an existing state council or commission serves in this category and add name below

Consumers Energy	Type of organization: Utility Contact Name: Ms. Teri L. VanSumeren Phone: (517)788-2067 Email: <a href="mailto:tlvansumeren@cmsenergy.com">tlvansumeren@cmsenergy.com</a>
Macomb County Community Services Agency	Type of organization: Unit of Local Government Contact Name: Mr. Steve Schuster Phone: 5864696329 Email: <a href="mailto:steve.schuster@macombcountymi.gov">steve.schuster@macombcountymi.gov</a>
Menominee-Delta-Schoolcraft Community Action Agency and Human Resource Authority	Type of organization: Local agency Contact Name: Mr. Joe Dehlin Phone: 9067867080 Email: <a href="mailto:jedhlin@mdscaa.org">jedhlin@mdscaa.org</a>
Michigan Community Action Agency Association Weatherization Committee	Type of organization: Non-profit (not a financial institution) Contact Name: Ms. Kate White Phone: 5173217500 Email: <a href="mailto:kwhite@mcaaa.org">kwhite@mcaaa.org</a>
Monroe County Opportunity Program	Type of organization: Non-profit (not a financial institution) Contact Name: Ms. Billie Jo Dye Phone: 7342412775 Email: <a href="mailto:billiejodye@gmail.com">billiejodye@gmail.com</a>
Oakland Livingston Human Services Agency	Type of organization: Local agency Contact Name: Mr. Gary Warsecke Phone: 2482092760 Email: <a href="mailto:garyw@olhsa.org">garyw@olhsa.org</a>
SEMCO Energy Gas Company	Type of organization: Utility Contact Name: Christina Beckwith Phone: 8883005064 Email: <a href="mailto:chrissy.beckwith@semcoenergy.com">chrissy.beckwith@semcoenergy.com</a>
State of Michigan	Type of organization: Unit of State Government Contact Name: Kris Schoenow Phone: 5173738896 Email: <a href="mailto:Schoenowk@Michigan.gov">Schoenowk@Michigan.gov</a>
State of Michigan	Type of organization: Unit of State Government Contact Name: Amy Dillon Phone: 5172415116 Email: <a href="mailto:Dillon1@michigan.gov">Dillon1@michigan.gov</a>
State of Michigan	Type of organization: Unit of State Government Contact Name: Tammy Bair Phone: 5173420030 Email: <a href="mailto:bairt@michigan.gov">bairt@michigan.gov</a>
Wayne Metro Community Action Agency	Type of organization: Non-profit (not a financial institution) Contact Name: Mr. Katy Kibbey Phone: 7342462280 Email: <a href="mailto:kkibbey@waynemetro.org">kkibbey@waynemetro.org</a>

**IV.6 State Plan Hearings (Note: attach notes and transcripts to the SF-424)**

Date Held	Newspapers that publicized the hearings and the dates the notice ran
04/18/2016	Lansing State Journal (4/1/16) , Marquette Mining Journal (4/1/16), Oakland Press (3/31/16, 4/1/16)

**IV.7 Miscellaneous**

<b>Recipient Business Officer</b>
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**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**WEATHERIZATION ANNUAL FILE WORKSHEET**

**(Grant Number: EE0006161, State: MI, Program Year: 2016)**

Kris Schoenow, Director  
Bureau of Community Action and Economic Opportunity  
Michigan Department of Human Services  
235 S Grand Ave. Ste. 204  
Lansing, MI 48933  
(517)373-8896  
[SchoenowK@michigan.gov](mailto:SchoenowK@michigan.gov)

**Recipient Principal Investigator**  
Amy Dillon, Weatherization Specialist  
Bureau of Community Action and Economic Opportunity  
Michigan Department of Human Services  
235 S Grand Ave. Ste. 204  
Lansing, MI 48933  
(517)241-5116  
[Dillona1@michigan.gov](mailto:Dillona1@michigan.gov)

**State Of MI Department Merger- New DUNS number**

In February 2015, MI Governor signed an Executive Order which merges the Michigan Department of Human Services and the Michigan Department of Community Health to create the Michigan Department of Health and Human Services. The Department has a new DUNS number and this has been updated in [www.sam.gov](http://www.sam.gov) and on Fed Connect. The new DUNS number is: 113704139  
[http://www.michigan.gov/documents/snyder/EO\\_2015-4\\_480863\\_7.pdf?20150210080617](http://www.michigan.gov/documents/snyder/EO_2015-4_480863_7.pdf?20150210080617)  
[http://www.michigan.gov/snyder/0,4668,7-277-57577\\_57657-347072--,00.html](http://www.michigan.gov/snyder/0,4668,7-277-57577_57657-347072--,00.html)

**Average Cost Per Unit**

Michigan utilizes the maximum average cost per unit allowable by DOE. Some subgrantees are experiencing high counts of poor housing stock that lead to high cost completions or deferrals.

**Program Year 2015 Carry over Fund Distribution to Subgrantees during PY16:**

MDHHS-BCAEO will distribute carry over funds to Subgrantees (LWOs) for the PY15 funding allocation later in the PY16 Year. Michigan uses a reimbursement method with subgrantees. The current budget is based on an estimate and will be updated in October when all final payments have been processed through the Department of Human Services accounting system at the end of the fiscal year. The breakdown of carryover is attached.

**Cost Allocation Plan for Michigan Department of Health & Human Services**

The State of Michigan submitted a Cost Allocation Plan to U.S. Health & Human Services for approval. The Department continued to submit amendments since the original approval in 4/2014. Due to the size and complexity of our Department resulting in the merger of the Department of Community Health and the Department of Human Services in 2015. The MDHHS continues to work with U.S. HHS to update and receive approval for our cost allocation.

**Policy Advisory Council (PAC):**

The PAC met on April 11th, 2016 and approved the state plan for submission. The minutes to the PAC meeting are attached.

**State Plan Public Hearing:**

Documentation attached to SF-424 indicates MI is in compliance with posting notice of the public hearing and to inform subgrantees how they can obtain a copy of the State Plan. The notice was publicized in the newspapers across Michigan shown in the attached documentation. Also, MDHS-BCAEO emailed the information to the subgrantees. The public hearing took place on April 18, 2016. Minutes of the hearing and publications are attached.

**Health & Safety Policy - Ventilation**

Michigan will use ASHRAE 62.2 for DOE funded units.

**Significant Changes for PY16**

- The State of MI has made policy changes based on recommendations from other states, the August 2015 DOE monitoring visit, and additional technical training provided to state staff.
- New WAP providers selected by competitive bid process for PY16
- 29.3 BTU used in algorithm based on most recent DOE study
- Changed policy to indicate no requirement of an SIR for health and safety measures or infiltration to match DOE policy (CSPM 606.1)
- Added policy stating estimations of efficiency on furnaces and appliances is not acceptable
- Updated contractor procurement policy (CSPM 409) at the suggestion and approval of DOE

**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**WEATHERIZATION ANNUAL FILE WORKSHEET**

**(Grant Number: EE0006161, State: MI, Program Year: 2016)**

- Added language to reallocate funding mid-year if needed and established criteria for reallocation of funds along with carryover fund distribution language.
- MI is implementing a risk assessment which will be completed annually for each subgrantee
- Updated heating degree days in the allocation formula to use average of most recent 10 years of Heating Degree Days by climate region
- Added Data and Confidentiality Policy Item (CSPM 623)
- Added Disaster Planning and Relief Policy Item (CSPM 624)
- Added Disaster Planning and relief plan
- Michigan Department of Health and Human Services is transitioning to a new financial computer system, SIGMA. The estimated live date is July 1, 2018.
- Michigan is working to establish an accredited Weatherization training center in Michigan

**Audit Submission to DOE**

- Michigan submitted audit documentation to DOE for approval on 1/29/16 and has not received a response. Significant changes included:
- Using WA8.9 rather than WA8.6
- Health & Safety SIR requirement removed per DOE policy
- Estimating Efficiency of furnace and appliances removed
- Updated General Heat Waste (Optional) Measures for PY16 to include furnace filters and weather-stripping. Added a \$250 cap including labor for each General Heat Waste Measure. Per DOE Policy.
- Removed SIR requirement for infiltration per DOE policy.

**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**STATE PLAN/MASTER FILE WORKSHEET**

**(Grant Number: EE0006161, State: MI, Program Year: 2016)**

This worksheet should be completed as specified in Section III of the Weatherization Assistance Program Application Package.

**V.1 Eligibility**

**V.1.1 Approach to Determining Client Eligibility**

Provide a description of the definition of income used to determine eligibility

DHHS-BCAEO weatherization eligibility utilizes 200 percent of poverty in determining eligibility under section 10 440.22(a). Michigan uses the most recent federal poverty guidelines. In addition, any household that contains a member who has received cash assistance payments during the preceding twelve month-period under Titles IV and XVI of the Social Security Act, Pub.L. No. 88-452, 42 U.S.C. § 2701 et seq. or applicable State or local law, is eligible for WAP Weatherization Assistance Program (WAP) services.

It should be noted that the LIHEAP Weatherization eligibility is 150% of poverty. Federal Poverty Guidelines are updated annually (usually January) upon release from the U.S. Dept. of Health & Human Services.

Income includes:

1. Money, wages and salaries before any deductions. This includes wages from assistantships, work-study, and stipends. This includes self-employment income. See Self-Employment Income section below.
2. Net receipts from non-farm or farm self-employment (receipts from a person's own business or from an owned or rented farm after deductions for business or farm expenses)
3. Self-Employment Income for each type of self-employment activity or business (see Income Computations: Self-Employment Income and Self-Employment Expenses).
4. Regular payments from Social Security (gross benefits, including any Medicare premium and/or state supplemental payments), railroad retirement, unemployment compensation, strike benefits from union funds, worker's compensation, veteran's payments, public assistance (including Family Independence Program-FIP, Supplemental Security Income-SSI, and State Disability Assistance-SDA), training stipends, alimony, and military family allotments Note: Retroactive lump sum payments for Social Security or Railroad Retirement Benefits should be prorated on a 12-month basis so that only benefits covering the three-month calculation period are included.
5. Private pensions, government employee pensions (including military retirement pay), and regular insurance or annuity payments
6. Income from individual retirement accounts (IRAs) received during the three-month calculation period, whether as monthly or lump-sum withdrawals NOTE: Lump-sum IRA withdrawals should be prorated on a 12-month basis, and three months of the prorated amount should be included in the calculation.
7. Dividends, interest, net rental income, net royalties, periodic receipts from estates or trusts, and net gambling or lottery winnings
8. Any lump sum payments received by Native Americans, such as from Casino income or other tribal income

Income excludes:

1. Combat zone pay
2. Capital gains
3. Any assets drawn down as withdrawals from a bank, the sale of property, a house, or a car
4. One time payments from a welfare agency to a family or a person who is in temporary financial difficulty
5. Tax refunds, gifts, loans, lump-sum inheritances, one-time insurance payments, or compensation for injury
6. Non-cash benefits such as the employer paid or union paid portion of health insurance or other employee fringe benefits (including the imputed value of health insurance for domestic partners), food or housing received in lieu of wages, the value of food and fuel produced and consumed on farms, the imputed value of rent from owner-occupied non-farm or farm housing, and such federal non-cash benefit programs such as Medicare (Medicare premiums are not excluded), Medicaid, food stamps (including cash received in lieu of food stamps), school lunches, and housing assistance
7. College scholarships and grants
8. Foster care payments, child support and adoption subsidies
9. Income earned by a child age 18 and under and attending school NOTE: "Earnings" do not include program benefits such as Social Security, Supplemental Security Income, etc.; these are included in the total household income.

Income Computations

An applicant's household's ACTUAL INCOME for the preceding three-month period including the date of application is computed in FACSPRO (See CSPM Item 905). For example, an application dated June 7 would have a three-month period of March 8 – June 7. Re-Certification of Application An applicant must be re-certified when eligibility lapses due to the length of time the applicant was waiting to receive Weatherization services. Re-certification must occur at least every 12 months if work on a unit (energy audit) has not been initiated.

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

**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**STATE PLAN/MASTER FILE WORKSHEET**

**(Grant Number: EE0006161, State: MI, Program Year: 2016)**

**Self-Employment Income**

Self-employment income must be documented for each type of self-employment activity or business. Business expenses may be deducted from the gross income amount determined for each self-employment activity/business. Documentation of claimed expenses must be included in the client file information. NOTE: Losses from a single self-employment source of income cannot be applied to any other self-employment income or other household income types. In other words, if self-employment business A realizes a loss of \$10,000, the income from that source is considered zero. The \$10,000 loss cannot be deducted from self-employment business B or other household income.

**Self-Employment Expenses**

Allowable expenses include all of the following:

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

The following are not allowable expenses:

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

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

- Copies of paychecks or pay stubs
- Written statements from employers
- Letters, benefit statements, or other documents from income sources, e.g., DHHS, Social Security, VA
- Unemployment Benefit determination letter or online benefits information
- If self-employed, accounting and other business records showing net income after business expenses.
- W-2 statements and tax forms Note: They will seldom be adequate by themselves, since they usually report a period ending well in advance of the date of application. An exception may be made for the self-employed, since tax records are a convenient source of information about their income. They should be used, however, in conjunction with a self-declaration.
- Other documents the subgrantee has reason to believe will fully verify the annual or annualized income of the applicant

After all other avenues of documenting income eligibility are exhausted, self-declaration is allowable, but evidence of the various attempts at proving eligibility must be contained in the client file, including a notarized statement signed by the potential applicant indicating that no other proof of income is available. If the self-declaration is for zero income for the entire household, then along with the declaration being notarized, approval by DHHS-BCAEO staff is also required, and a copy of the approval must be in the client file. Requests for approval must be submitted by email to the subgrantee's grant manager. The requests should include the applicant's name, date of birth, the last four digits of the applicant's SSN and an explanation of how the household is paying for their living costs.

Community Service Policy Manual 601- Income Eligibility Guidelines [http://www.michigan.gov/documents/dhs/CSPM\\_600\\_Series\\_215133\\_7.pdf](http://www.michigan.gov/documents/dhs/CSPM_600_Series_215133_7.pdf)  
20160131104200

Describe what household Eligibility basis will be used in the Program

Michigan will use 200 percent of poverty in determining eligibility under section 440.22(a). Michigan uses the most recent federal poverty guidelines. MI updates the poverty guidelines when released by U.S. Department of Health & Human Services (usually January of each year).

**Automatic Income Eligibility**

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

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

NOTE: The receipt of these benefits in the previous twelve months must be documented in the case file. The State's quarterly SSI payments do not need to be documented, but must be included in the calculation.No dwelling unit, with the exception noted below, may be weatherized without documentation that the

**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**STATE PLAN/MASTER FILE WORKSHEET**

**(Grant Number: EE0006161, State: MI, Program Year: 2016)**

dwelling unit is an eligible unit. A standard weatherization application or FACSPRO intake/customer report is used by subgrantees. This application requires that all household income be calculated, per DOE (Department of Energy) requirements. It also requires that income and home ownership is verified by subgrantee staff. Income eligibility is determined using web-based FACSPRO database system. Subgrantees are required to maintain a signed weatherization program application or FACSPRO client report. All other documentation of client eligibility is uploaded to FACSPRO.

If weatherization services do not begin (an energy audit has not been initiated) within 12 months of the eligibility determination date, the household's eligibility must be re-determined.

Priorities are described in Section V.5.

Community Services Policy Manual (CSPM) 600 Series:

[http://www.michigan.gov/documents/dhs/CSPM\\_600\\_Series\\_215133\\_7.pdf?20140325124132](http://www.michigan.gov/documents/dhs/CSPM_600_Series_215133_7.pdf?20140325124132)

Describe the process for ensuring qualified aliens are eligible for weatherization benefits

Michigan will follow the policies outlined in "Summary of Immigrant Eligibility Restrictions under Current Law as of 2/25/2009" in the HHS guidelines, when determining eligibility of qualified and nonqualified aliens.

### **V.1.2 Approach to Determining Building Eligibility**

Procedures to determine that units weatherized have eligibility documentation

Pursuant to 10 CFR Part 440.1: the weatherization program is to increase the energy efficiency of dwellings owned or occupied by low income persons.

10 CFR 440.3 defines a dwelling unit as a house, including stationary mobile home, an apartment, a group of rooms, or a single room occupied as a separate living quarters.

Per 10 CFR Part 440.16(a): No dwelling unit may be weatherized without documentation that the unit is an eligible unit as provided in 440.22.

#### **Eligible Dwelling Units:**

Structures eligible for weatherization include single-family, manufactured housing (mobile homes), and both large (five + units) and small multi-family housing (two to four units). All structures must be stationary and have a specific mailing (street) address. Campers and non-stationary trailers are not eligible. All dwellings to be weatherized must be owner or renter occupied, and occupied by a household:

1. Whose income is at or below 200 percent of the poverty level established by the U.S. Department of Health and Human Services, or  
2. Which contains a member who has received any one of the following at any time during the 12-month period preceding the date of application for weatherization assistance:

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

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

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

**Eligibility Documentation:** The following documents must be uploaded to FACSPRO using the document link on the customer intake screen:

- Signed FACSPRO Customer Report or Standard Application Form, DHS-4283, including the Social Security numbers of all household members
- Signed FACSPRO weatherization disclaimer
- 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)



**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**STATE PLAN/MASTER FILE WORKSHEET**

**(Grant Number: EE0006161, State: MI, Program Year: 2016)**

- Utility usage documentation
- BCAEO approval of self-declaration of zero income for the entire household (if applicable)
- Any other documents the subgrantee has reason to believe will fully verify the income of the applicant household.

If energy savings cannot be realized due to the condition of a home, these conditions shall be documented in the electronic file and the home shall not be weatherized. Such conditions shall be brought to the attention of the client with referrals to other help sources available.

**Shelters/Group Homes/Transitional Living**

The subgrantee may weatherize a shelter, group home or similar facility for long- or short- term residents, provided the owner or organization and residents of the dwelling units meet prescribed building and income eligibility requirements. Prior, written approval by the DHHS-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 DHHS-BCAEO email for review and approval. Include in the subject line: "*Shelter, Group Home, Transitional Living facility application approval request*".

Subgrantees 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).

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

1. Verification of individual resident's income eligibility (if applicable)
2. A copy of the DHS-4284, Weatherization Assistance Program Application for Shelters, Group Homes and Transitional Facilities, with the following supporting documentation:
  1. A signed statement from the facility operator attesting that 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. Written statement providing proof of benefit accrual to the low-income tenant(s).
  4. A copy of the written approval by the MDHHS BCAEO staff for the weatherization of any shelter, group home or transitional facility.

**Describe Reweathering compliance**

Michigan will follow the requirements of CFR 440:

10 CFR Part 440.18 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.

If the Disaster Plan is enacted, MDHHS will seek approval from the DOE Project Officer for permission to proceed and a determination if homes are able to be re-weatherized.

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

A record of previously weatherized dwelling units by address is maintained on FACSPRO by subgrantees or kept by the agency in their own database.

**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**STATE PLAN/MASTER FILE WORKSHEET**

**(Grant Number: EE0006161, State: MI, Program Year: 2016)**

The address is checked prior to scheduling a household for service to see whether that the house has been previously weatherized. If the house has been previously weatherized before 9/30/1994 with DOE (Department of Energy) funds then it is eligible for re-weatherization, as defined 10 CFR 440. This policy is clarified in item 605 of the CSPM (Community Services Policy Manual) and the house will not be weatherized unless the DOE regulations revise the re-weatherization date. If the house is eligible for re-weatherization, the subgrantee makes a determination whether or not to re-weatherize the house based on a number of factors including the energy usage of the house as well as the number of other households currently on the waiting list.

A maximum of 50 percent of a subgrantee'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.

CSPM 605 for MI Weatherization Policy

[http://michigan.gov/documents/dhs/CSPM\\_600\\_Series\\_215133\\_7.pdf?20150127175211](http://michigan.gov/documents/dhs/CSPM_600_Series_215133_7.pdf?20150127175211)

Describe what structures are eligible for weatherization

Structures eligible for weatherization include single family, manufactured housing, and both large and small multifamily housing. All structures must be stationary and have a specific mailing (street) address. Campers and non-stationary trailers are not eligible. All non-traditional type dwelling units will be reviewed by the DHHS-BCAEO, and if necessary, with the DOE Project officer for approval.

**Eligible Dwelling Units**

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

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

- Whose income is at or below 200 % of the poverty level established by the U.S. Department of Health and Human Services, or which contains a member who has received any one of the following at any time during the 12-month period preceding the date of application for weatherization assistance: FIP or SSI.
- Occupying a qualified rental dwelling unit in accordance with Community Services Policy Manual (CSPM) Item 608.
- Occupying a shelter, group home or transitional facility in accordance with CSPM Item 608.1.

**State Historic Preservation Office Review (SHPO)**

DHHS-BCAEO and the Michigan State Housing Development Authority (MSHDA), have in place a programmatic agreement in place to ensure National Historic Act compliance with DOE funded activities, originally signed April 2010. Per 36 CFR 800.14 the agreement was extended along with 43 other state agreements for 10 years. CSPM 619 outlines the SHPO policy for Michigan subgrantees. This can be viewed at the CSPM link located at the bottom of this section. See agreement at this link:

<http://energy.gov/eere/wipo/downloads/michigan-state-historic-preservation-programmatic-agreement>

**Multi Unit Buildings:**

The subgrantee may weatherize rental dwelling units in a multi-unit building when the property owner has signed a landlord agreement authorizing the weatherization work, accepting conditions protecting the interests of low-income tenants and for those units where the tenant does not pay for energy directly, the property owner agrees to specifically demonstrate that the benefits of the weatherization accrue primarily to the tenant. Not less than 66 percent (50 percent for duplexes and four-plexes, and certain eligible types of multi-unit buildings) of the resident households of the building meet the eligibility requirements cited in 10 CFR Part 22(b)(2) and (3) above. The 66 percent/50 percent rule applies to multi-unit buildings. If the building is located in a complex, each building is to be considered separately when determining the 66 percent/50 percent eligibility. A vacant unit may be weatherized in a multi-unit building only where; -Not less than 50 percent of the dwelling units in the building are eligible dwelling units for duplexes and four-unit buildings; or -Not less than 66 percent of the dwelling units in the building are eligible dwelling units for five-unit or more buildings. A vacant unit is considered an ineligible unit in the 66 percent/50 percent calculation, unless the vacant unit(s) is a part of a Federal, State, or local government program for rehabilitation and will be occupied by eligible families within 180 days. A vacant building may be weatherized only if the building is part of a Federal, State, or local government rehabilitation program. The units must be occupied within 180 days with eligible families. A notation will be made in the file regarding the date(s) of occupancy.

**Rehabbed Multi-Unit Buildings**

Weatherization funds may be used to weatherize a dwelling being rehabbed such as Habitat for Humanity rehabs or MSHDA 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 grantee. These units can not 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.

**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**STATE PLAN/MASTER FILE WORKSHEET**

**(Grant Number: EE0006161, State: MI, Program Year: 2016)**

Building Eligibility Policy can be found in CSPM 600 Series  
[http://michigan.gov/documents/dhs/CSPM\\_600\\_Series\\_215133\\_7.pdf?20150127172723](http://michigan.gov/documents/dhs/CSPM_600_Series_215133_7.pdf?20150127172723)

Describe how Rental Units/Multifamily Buildings will be addressed

**Rental Units:**

In order to ensure the benefits of weatherization accrue primarily to the low-income tenants, subgrantees are required to have a Landlord Tenant Agreement (consistent with Community Services Policy Manual) and may have a written landlord contribution policy. Subgrantees cannot not require landlord contributions for DOE funded weatherized single family homes but are able to ask and encourage a landlord to contribute. For multi family homes, when applicable, a landlord contribution is required. Further, each subgrantee is required to 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 must state:

- In consideration for the weatherization improvements, The Owner does covenant and agree that the monthly rental fee of the premises, as shown on Exhibit A, shall not be increased for a period of two years from the commencement date, unless such rental increase can be fully justified due to significant increases in actual operating costs.
- The Owner agrees to maintain the weatherization materials installed under this Agreement, in accordance with all relevant codes regarding maintenance.
- The Owner agrees not to evict, terminate, or institute any court action for possession against any eligible dwelling unit tenant for the 12 months following the commencement 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.
- The Owner agrees that the terms, premises, and obligations of the 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."
- The Tenant's Synopsis lists the stipulations in the Landlord Agreement and includes the landlord's name and the date the landlord signed the Landlord Agreement.
- The landlord agreement language has been clarified as follows: "...shall not be increased for a period of two years from the date weatherization activities were completed on said unit."

The CSPM item also includes the following language: "Subgrantees are advised to inform the clients of the terms of the landlord agreement. Subgrantees are advised to call upon the assistance of available service organizations (legal aid; nonprofit tenant-landlord mediation services, etc.) when complaints are received."

**Multi Unit Rental Units:**

Per, 10 CFR Part 440.22(b)(3), a subgrantee may weatherize a building containing rental dwelling units... where: (i) The benefits of weatherization assistance in connection with such rental units where the tenants pay for their energy through their rent, will accrue primarily to the low-income tenants residing in such units; (ii) Rents shall not be raised because of the increased value of dwelling units due solely to weatherization assistance provided under this part; and (iii) No undue or excessive enhancement shall occur to the value of the dwelling unit. The property owner has signed a landlord agreement authorizing the weatherization work, accepting conditions protecting the interests of low-income tenants and for those units where the tenant does not pay for energy directly, the property owner agrees to specifically demonstrate that the benefits of the weatherization accrue primarily to the tenant.

Not less than 66 percent (50 percent for duplexes and four-plexes, and certain eligible types of multi-unit buildings) of the resident households of the building meet the eligibility requirements cited in 10 CFR Part 22(b)(2) and (3) above. The 66 percent/50 percent rule applies to multi-unit buildings. If the building is located in a complex, each building is to be considered separately when determining the 66 percent/50 percent eligibility.

A vacant unit may be weatherized in a multi-unit building only where; Not less than 50 percent of the dwelling units in the building are eligible dwelling units for duplexes and four-unit buildings; or not less than 66 percent of the dwelling units in the building are eligible dwelling units for five-unit or more buildings. A vacant unit is considered an ineligible unit in the 66 percent/50 percent calculation, unless the vacant unit(s) is a part of a Federal, State, or local government program for rehabilitation and will be occupied by eligible families within 180 days. A vacant building may be weatherized only if the building is part of a Federal, State, or local government rehabilitation program. The units must be occupied within 180 days with eligible families. A notation will be made in the file regarding the date(s) of occupancy.

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

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

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

- A minimum of 66 percent of the dwelling units in the building are occupied by a family unit that meets the income requirement (as required under 10 CFR 440.22(b)(2));
- For a reasonable period of time after weatherization work has been completed, the eligible dwelling unit will not be subject to rent increases as a result of the weatherization (as required under 10 CFR 440.22(b)(3)(i)); and

**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**STATE PLAN/MASTER FILE WORKSHEET**

**(Grant Number: EE0006161, State: MI, Program Year: 2016)**

- No undue or excessive enhancement has occurred to the value of the dwelling unit (as required under 10 CFR 440.22(b)(3)(i)).

For list #1, see Website at: [http://www.eere.energy.gov/wip/docs/10\\_cfr\\_440\\_22\\_b\\_4\\_i\\_list.xls](http://www.eere.energy.gov/wip/docs/10_cfr_440_22_b_4_i_list.xls)

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

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

For List #2, see Website at: [http://www.eere.energy.gov/wip/docs/10\\_cfr\\_440\\_22\\_b\\_4\\_ii\\_list.xls](http://www.eere.energy.gov/wip/docs/10_cfr_440_22_b_4_ii_list.xls)

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

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

For List #, see Website at: [http://www1.eere.energy.gov/wip/docs/rd\\_mfh\\_low\\_and\\_very\\_low.xls](http://www1.eere.energy.gov/wip/docs/rd_mfh_low_and_very_low.xls) The buildings identified on the lists must still meet all other applicable eligibility requirements.

Note: The final DOE rule (WPN 10-15) does not:

- Result in automatic eligibility for identified buildings, but rather, it only addresses a subset of eligibility requirements, or
- Establish a priority for the weatherization of the identified buildings. States are not required to establish a particular prioritization with regard to the weatherization of multi-unit buildings.

**Benefit Accrual to the Tenant** In instances in which a tenant does not pay for energy directly, subgrantees must ensure the weatherization benefits accrue to the low-income tenant. To ensure this, subgrantees have the option of:

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

LWOs wishing to use their own policy must submit the draft policy to the MDHHS-BCAEO 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.

**Multi-Unit Application Process**

A client file must be retained for every unit in the building. See CSPM Item 612 for Client File requirements. An application must be completed for every unit in the building. Exception: For units in a building(s) included in one of the three DOE posted listings of eligible properties, individual household applications (DHS-4283) are not required. In lieu of this application, completion of the Michigan Department of Health & Human Services BCAEO Multi-Family Property Intake Form, DHS-4283-M, is required. A client file is not required for these units. A building file must be retained for each building and must include required documents as described in CSPM Item 612.

**Income Verification - Units on DOE Listing**

For multi-unit buildings included on one of the three DOE posted listings of eligible properties, income eligibility is satisfied for 66 percent in each multi-unit building. To ensure as much DOE funding as possible is available for each project, LWOs can opt to document income eligibility for all units in the building. The required documentation can be obtained from the property management office and should include verification of the annual household income for each unit. This information

**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**STATE PLAN/MASTER FILE WORKSHEET**

**(Grant Number: EE0006161, State: MI, Program Year: 2016)**

must be included in all client files. Note: The income eligibility determination must have been made within the last 12 months. This information must be included in all building files. See CSPM Item 601 for Income Eligibility Guidelines. See CSPM Item 612 for building file requirements.

**Units with Rent Based on Income**

For multi-unit buildings not on one the three DOE listings, where tenant rent is based on household income, income eligibility verification documentation may be collected from the property management office if the following information is verified and documented:

1. Rental fees are based on household income.
2. An annual income verification process is conducted for every unit.
3. The annual income verification has occurred within the last 12 months. The look back period starts with the application date and back 12 months.
4. The management office collects verification documents for all income sources reported.

Self-certification statements will not satisfy this requirement. This information must be included in all building files. See CSPM Item 601 for Income Eligibility Guidelines. See CSPM Item 612 for building file requirements.

**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.

**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 grantee is meeting or exceeding all the goals for elderly, and 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 grantee. These units can not be given a priority just because they are a part of a rehab program.

**Multi-Unit DOE Funding:** Per DOE WPN 10-01, when addressing multi-unit buildings with DOE funds, multiply the total number of income-eligible units in the multi-unit buildings by the current statewide average cost per unit to determine the amount of DOE funding available for weatherizing the building. All units in the building can be served and all units should be reported to DOE. The maximum amount of DOE funds that can be used will be the lesser of either one of the following:

- The percentage of low-income eligible units times the total allowable weatherization costs (estimated in the initial audit).
- The number of eligible units multiplied by the maximum average allowable cost per unit.

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.

**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.

**Landlord Contributions**

In the case of multi family buildings, subgrantees should require financial participation, when feasible, from owner's of such buildings.

CSPM 608, 608.1, 610.1 and 610.2:

[http://michigan.gov/documents/dhs/CSPM\\_600\\_Series\\_215133\\_7.pdf?20150127175211](http://michigan.gov/documents/dhs/CSPM_600_Series_215133_7.pdf?20150127175211)

**Describe the deferral Process**

Each subgrantee is required to have a written walk-away (deferral) policy which is in the best interest for its service area. Examples of reasons to walk away from a unit scheduled to be weatherized include:

- Standing water, mold, friable asbestos, deteriorated lead-based paint surfaces, or other hazardous materials that cannot be addressed by the weatherization work.
- Evidence of infestations of rodents, insects, and/or other vermin.
- Unvented space heater(s) that may have a harmful effect on the air quality of the home.

**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**STATE PLAN/MASTER FILE WORKSHEET**

**(Grant Number: EE0006161, State: MI, Program Year: 2016)**

- Unsecured pets that may prevent workers from safely completing their work.
- The presence of sewage or animal feces in or around the home.
- Improperly stored chemicals, combustible materials, or other fire hazards that present a danger to the occupants or the workers.
- Maintenance or housekeeping practices that limit the access of workers to the dwelling or create an unhealthy work environment.
- Major remodeling is in progress, which limits the proper completion of weatherization measures.
- The home receives HUD funding and at the time of completion, the unit will not meet applicable HUD Lead-Based Paint standards.
- Electrical or plumbing hazards or structural failures that cannot be addressed/completed within Incidental Repair or Health and Safety (H&S) cost limitations.
- Threat(s) of violence or abusive behavior to worker(s) or household member(s) during the weatherization process.
- The illegal presence or use of any controlled substance in the home during the weatherization process. This includes marijuana.
- Occupant has known health conditions that prohibit and/or limit the installation of insulation or other weatherization materials.
- The building or dwelling unit is for sale or in foreclosure.
- Ownership cannot be confirmed due to a legal dispute. Clear title must be established before services can be provided.
- The building or dwelling unit is scheduled for demolition/redevelopment.

**Note:** When the auditor/inspector or any other weatherization employee encounters an unsafe or inoperable heating appliance during the heating season, weatherization work should not proceed until the condition is corrected. Although Michigan has acknowledged marijuana as a legal substance, federal law does not recognize marijuana as legal. Therefore, federal law will prevail as the program is federally funded. Grantees are required to have a written deferral policy that outlines the procedures to be followed when making a deferral decision and notifying the customer. It should include guidelines for establishing a time period for correction and an identification of resources and options to assist the applicant.

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

**Walk-away (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 subgrantee'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.

CSPM 609

[http://michigan.gov/documents/dhs/CSPM\\_600\\_Series\\_215133\\_7.pdf?20150127175211](http://michigan.gov/documents/dhs/CSPM_600_Series_215133_7.pdf?20150127175211)

**V.1.3 Definition of Children**

Definition of children (below age): **19**

**V.1.4 Approach to Tribal Organizations**

Recommend tribal organization(s) be treated as local applicant?

If YES, Recommendation. If NO, Statement that assistance to low-income tribe members and other low-income persons is equal.

In accordance with 10 CFR 440.16(f), low-income members of an Indian tribe will receive benefits equivalent to the assistance provided to other low-income persons within the state.

**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**STATE PLAN/MASTER FILE WORKSHEET**

**(Grant Number: EE0006161, State: MI, Program Year: 2016)**

**V.2 Selection of Areas to Be Served**

All 83 counties are served. The state contracts with primarily Community Action Agencies (CAAs) to provide services throughout the state. Services are based largely on CAAs historical geographical boundaries and past performance. This enables the CAAs to use their existing outreach structure to inform low-income persons about the program and to take applications. Each State of Michigan local weatherization subgrantee is a CAA or other public or nonprofit entity.

As mentioned in the annual file, misc. section: DHHS-BCAEO held statewide procurement for WAP operators with the intention of meeting federal procurement policy by showing fair and competitive bidding procedures. The Invitation to Bid (ITB) was posted on the State of MI Department of Technology, Management, and Budget on the Buy 4 Michigan website <https://www.buy4michigan.com/bso/> and complied with federal and state procurement policy. No bids were received during the bidding process for Alger County or Marquette County. BCAEO internally assessed the capacity and the accessibility of surrounding Weatherization Operators in the Upper Peninsula to determine if any were able to sustain a larger service area. After reviewing past performance, contractor history, Energy auditor and Quality Control inspector at each agency along with distance to the service area, BCAEO determined that Menominee Delta Schoolcraft Community Action Agency would be the best candidate to service Alger and Marquette counties. MDS-CAA has agreed to extend their current service area to include Alger and Marquette counties which ensures full state WAP coverage. Regular ITB procurement for Weatherization Operators in Michigan will be conducted when contracts and extensions have been exhausted or as determined as needed by federal or state government.

The state reserves the right to re-allocate funding from one subgrantee to another, should any of the current subgrantees be unable, for whatever reason, to fulfill their obligations to implement the program in their service area. The term implement includes low production levels. Additionally, in an event that an area is unserved, the DHHS-BCAEO reserves the right to designate a provider for the service area until another Invitation to Bid is posted.

**V.3 Priorities for Service Delivery**

Michigan utilizes a priority point system when delivering services to low income homes to meet 10 CFR 440.

Mandatory priority categories are as follows:

- Elderly Units
- Disabled Units
- Households with children
- High Residential Energy User
- High Residential Energy Burden

These priorities are used pursuant to CSPM 611.

Subgrantees utilize a statewide database which determines eligibility. Each agency has set up priority points for the WAP which aligns with the categories identified in this section.

CSPM 611 can be viewed at:

[http://www.michigan.gov/dhs/0,4562,7-124-5455\\_7199\\_45583\\_45584---,00.html](http://www.michigan.gov/dhs/0,4562,7-124-5455_7199_45583_45584---,00.html)

**V.4 Climatic Conditions**

Michigan has large seasonal temperature changes and a significant north south temperature variance. The number of Heating Degree Days (for a 10 year time span using the most recent available data) for each climate division in Michigan. There are 10 climate divisions established by the National Oceanic and Atmospheric Administration. The percentage of heating degree days is factored into the funding allocation formula. The heating degree day average was obtained from the Midwest Regional Climate Center data.

U.S. Department of Energy  
WEATHERIZATION ASSISTANCE PROGRAM (WAP)  
STATE PLAN/MASTER FILE WORKSHEET

(Grant Number: EE0006161, State: MI, Program Year: 2016)

The National Energy Audit Tool (NEAT) program is adjusted by area of the state for the heating degree days. When a NEAT audit is completed in the upper peninsula, it may call for more insulation than a NEAT audit completed in the southernmost part of the state.

Heating Degree Days by Climate Division (Source: <http://mrcc.isws.illinois.edu/CLIMATE/stnchooser2.jsp>)

See attachment in SF-424 for a breakout of data by climate division in MI.

## V.5 Type of Weatherization Work to Be Done

### V.5.1 Technical Guides and Materials

#### **Technical Weatherization Guides include:**

##### **SOM Technical Weatherization Policy Manual**

[http://www.michigan.gov/documents/dhs/Technical\\_Weatherization\\_Policies\\_Manual\\_215832\\_7.pdf?20130911094855](http://www.michigan.gov/documents/dhs/Technical_Weatherization_Policies_Manual_215832_7.pdf?20130911094855)

##### **Retrofitting Michigan: Weatherization Field Guide**

The guide is too large to put on our MDHHS-BCAEO website. Subgrantees access the field guide via our statewide database, along with all other policy. Although a link is available on the website which directs users to the NREL SWS website.

##### **The Standard Work Specifications for Home Energy Upgrades for Single Family, Manufactured Housing, and Multifamily Homes**

<http://sws.nrel.gov>

##### **US 10-CFR-600**

##### **US 2-CFR-200**

##### **US DOE Weatherization Program Notices**

[www.waptac.org](http://www.waptac.org)

##### **U.S. DOE Weatherization Memorandums**

[www.waptac.org](http://www.waptac.org)

##### **Community Services Policy Manual**

[http://www.michigan.gov/dhs/0,4562,7-124-5455\\_7199\\_45583\\_45584---,00.html](http://www.michigan.gov/dhs/0,4562,7-124-5455_7199_45583_45584---,00.html)

##### **State of Michigan Department of Licensing and Regulatory Affairs (LARA) Policy**

The State of Michigan LARA provides oversight for mechanical, construction, and safety laws. This department houses Michigan Occupational Safety and Health Administration (MIOSHA) which provides worker safety oversight and training.

All manuals and policy are provided to the network via the MDHHS-BCAEO website, the statewide database document center, and via email. When updates are made, the network is notified and all policy is updated online and in the database. MDHHS-BCAEO also provides updates in the BCAEO Update newsletter that is sent to the network.

All subgrantee agreements and vendor contracts, active in Program Year 2015 and beyond, contain language which clearly documents the SWS specifications for work quality. Language matches that of WPN 15-4 Section 2. The signature on the contract serves as proof of receipt.

##### **Weatherization Work**

All is performed in accordance with DOE-approved audit procedures and 10 CFR 440, Appendix A, Standard Work Specifications, and Michigan Rules and Regulatory policy.

The weatherization measures most commonly installed in eligible units are major bypass; duct sealing, repair, replacement and insulation; attic and wall insulation; and health and safety measures. Michigan has also added cost-effective electric base load measures including refrigerator replacement and compact fluorescent



**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**STATE PLAN/MASTER FILE WORKSHEET**

**(Grant Number: EE0006161, State: MI, Program Year: 2016)**

(CFL) light bulbs. Domestic water heaters (DWH) are an electric base load measure being replaced under Energy Savings and/or Health & Safety on eligible dwelling units.

Standards for DWH Replacement

Requires Water Heater Replacement

- Excessive tank corrosion has caused irreparable water leaks.
- Prolonged water leaks have caused floor damage that requires repair.
- Missing parts are no longer available. For example, an original equipment replacement cannot be located for a draft hood and the carbon monoxide level cannot be adjusted to acceptable levels with a generic draft hood.
- Water heater tank is full of corrosion and sediment that cannot be flushed. As a result, the water heater cannot provide an adequate amount of hot water for the household. Upon inspection, the sacrificial anode has corroded away.
- When venting into approved chimney cannot emit gases safely from dwelling area.

Does Not Require Water Heater Replacement:

Carbon monoxide readings exceed the threshold because:

- Combustion by-products are not venting to the outside properly.
- Blocked chimneys, vents terminating inside the living space, and back-drafting can be identified and remedied without having to replace the existing water heater. The flame is being impinged. The baffle or other parts may have been knocked out of position. These can be adjusted so that the flame is no longer impinged.
- The water heater has the wrong burner nozzle for the fuel type. The nozzle can be replaced with one appropriate for the current fuel type.
- Combustion air and gas pressure settings are out of adjustment. Air and pressure settings are out of adjustment. Air and pressure can be adjusted to reduce carbon monoxide to acceptable levels.
- Atmospherically vented natural gas, propane, or oil water heater is located in a bedroom, which violates the building code. If the water heater location prohibits the ability to weatherize a dwelling, the crew or contractor could move the existing water heater for a fairly modest cost.

General Heat Waste Measures/Optional Measures

General Heat Waste Measures, referred to as Optional Measures turned on by a Grantee shall not exceed \$250.00. Grantees must identify at the beginning of the program year if they will be utilizing optional measures and how they will determine when those measures are necessary. Optional weatherization measures include:

- \*Smart thermostat\*
- \*Faucet aerator\*
- \*Water heater wrap (insulating blanket)\*
- \*Water heater pipe insulation (on first six feet of hot water pipe exiting water heater)\*
- \*Low flow showerheads\*
- \*Limited weather-stripping and caulking to increase comfort (does not include major air sealing work, which should be guided by blower door testing)
- \*Furnace filters\*
- Clean & Tune

Programmable Thermostat: Based upon client lifestyle and capacity to understand technical operation instructions a programmable thermostat, the certified weatherization auditor may recommend that a programmable thermostat be installed.

DWH tank insulation: the manufacturers' instructions prohibit the installation of fiberglass insulation blanket, and/or the appliance would be placed in an area of the home and the material would be compromised by the occupants (children). The auditor has the responsibility to identify whether to install or not install the measure.

Low-flow showerhead: When the occupants have a very low water pressure, the low-flow showerhead would further impede the water flow. The auditor has the responsibility to identify whether to install or not install the measure.

Furnace Clean/Tune/Repair: With the current mechanical licensing requirement that all mechanical air handling appliances are to be evaluated by a licensed technician, a certified weatherization energy auditor/pre-inspector can request all mechanical equipment be evaluated for energy efficiency & safe operation.

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

**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**STATE PLAN/MASTER FILE WORKSHEET**

**(Grant Number: EE0006161, State: MI, Program Year: 2016)**

suspend a QC inspector from conducting final inspections for the SOM Weatherization program if the Energy auditor/QC inspector does any one or more of the following:

1. Commits fraud or deceit with respect to any required license or permit application or an inspection report submitted to the Grantee or SOM;
2. Violates any state or federal law, rule, permit, or order relating to the inspection and/or installation of weatherization measures.
3. Makes a false or misleading statement in that portion of a written report that deals with professional qualification or in any testimony concerning professional qualifications;
4. Engages in an act or omission involving dishonesty, fraud, or misrepresentation with the intent to substantially benefit a home Energy auditor/QC inspector or other person or with the intent to substantially injure another person;
5. Engages in an act of fraud, misrepresentation, or deceit in the making of a home inspection;
6. Pays a finder's fee or a referral fee to a person in connection with an inspection of or work to be done on a residence;
7. Fails or refuses without good cause to exercise reasonable diligence in developing a home inspection report, preparing a report, or communicating a report;
8. Accepts a home inspection assignment when the employment itself is contingent upon the home Energy Auditor/QC Inspector reporting a predetermined estimate, analysis, or opinion or when the fee to be paid is contingent upon the opinion, the conclusions, analysis, or report reached or upon the consequences resulting from the assignment;
9. Performs work or improvement to a residence upon which the Energy Auditor/QC Inspector performed a home inspection within the previous 12 months;
10. Employs fraud, deceit, or misrepresentation in obtaining or attempting to obtain a license or renewal of a license including builder, mechanical, plumber, electrician, and maintenance and alteration licenses such as mobile home, insulator, window installer, etc.
11. Is responsible for citation of repeated (3 or more) findings in consecutive monitoring reports completed by either the grantee, DHS BCAEO or DOE;
12. Commits an act or acts of malpractice, gross negligence, or incompetence in the performance of home inspections;
13. Practices as a licensed home Energy auditor/QC inspector without a current SOM Energy Auditor/QC Inspector certification;
14. Engages in conduct that could result in harm or injury to the public during the course of an audit or inspection.

#### Notice

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

Bureau of Community Action and Economic Opportunity  
235 S. Grand Ave. Suite 204  
PO Box 30037  
Lansing, MI 48909

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

#### Appeals Process

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

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

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

#### Panel Review Process

The review process will include the following elements:

1. Convening of the panel
2. Panel members will select a panel spokesperson.
3. 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. Panel members will communicate any points of clarification needed with the parties.

#### Deliberation and Decision

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

**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**STATE PLAN/MASTER FILE WORKSHEET**

**(Grant Number: EE0006161, State: MI, Program Year: 2016)**

**Decertification Period**

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

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

In the event of a QC Inspector suspension, a letter outlining the suspension will be provided to Michigan Weatherization Policy Advisory Council, Department of Energy and Michigan Community Action.

**V.5.2 Energy Audit Procedures**

Audit Procedures and Dates Most Recently Approved by DOE

**Single-Family :** Single-Family NEAT software on non-standard homes. Approved by DOE November 17, 2011. Submitted audit procedures for review to DOE 1/29/16.

**Manufactured Housing :** Mobile Home MHEA software on manufactured homes. Approved by DOE November 17, 2011. Submitted audit procedures for review to DOE 1/29/16.

**Multi-Family :** Multi-Family (5 + unit or more) TREAT or any DOE-approved multi-family audit. Approved by DOE November 17, 2011. MI does not typically complete many multi-unit housing projects. MI will utilize MulTEA, the DOE approved audit, once it has been completed.

**Comments**

Due to the length of time it may take DOE to review and approve auditing tools, MDHHS-BCAEO has submitted energy audit documents for review to DOE 1/29/2016. Michigan is committed to complying with this requirement and expects approval from DOE prior to the beginning of the program year 2016.

Changes to our program include: establishing a limit to general heat waste measures, ensuring Health and Safety measures are not SIR driven, incidental repair policy now matches DOE incidental repair policy and a cap has been added, change in infiltration requirements to match DOE policy, upgrade to WA8.9 from WA8.6, upgrade to our statewide database Weatherization module, WxPro, to streamline the process with more ease.

MI BCAEO technical staff, Christopher Addison, has been leading a work group with current energy auditors, quality control inspectors, and weatherization managers to review changes to the program and how audits are currently conducted. An extensive training plan for the network will begin prior to the program year.

Michigan multifamily dwelling units represent less than 20% of a Grantee's building type. In the event that a subgrantee requests to complete a multifamily dwelling, they will submit documentation to MDHHS-BCAEO WAP Technical Staff and Weatherization Specialist for review. MDHHS-BCAEO staff will work with the DOE Project Officer to review material for approval prior to commencing weatherization the building. MDHHS-BCAEO will also verify that the subgrantee requesting to weatherize a multifamily dwelling has qualified staff with the required training per WPN 15-4 to complete the unit.

**V.5.3 Final Inspection**

Michigan will utilize a separate energy auditor and QCI per WPN15-4 for Program Year 2016. There will be separate Energy Auditors and Quality Control inspectors for each weatherization job. State monitors will perform quality assurance reviews on at least 5% of all completed units and 10% file reviews. As of January 2016, MI has 41 certified Quality Control inspectors. In the event that a subgrantee is not able to find a QCI, MDHHS-BCAEO will help subgrantees identify QCIs from neighboring agencies to assist.

A complete audit and quality control inspection is required for each home weatherized. Audits include WA8 audit reviews as well as required testing. Quality control inspection approval is mandatory for a home to be considered a completion. Beginning July 1, 2014 all Quality Control Inspectors implemented a

**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**STATE PLAN/MASTER FILE WORKSHEET**

**(Grant Number: EE0006161, State: MI, Program Year: 2016)**

quality control checklist which they sign and date confirming that all work from the original audit was completed to required standards. The checklist is created by the energy auditor based on the energy audit results and provides the measure, the SWS item linked with the measure, and the CSPM or TWP reference policy item for that measure. No dwelling unit may be reported to DOE as completed until all weatherization material is installed and a final quality control inspection is performed. Policies and specifications are provided to each subgrantee through the Technical Weatherization Policy (TWP) manual and the CSPM. An example of the quality control checklist has been uploaded and is available in the SF-424. The Quality Control checklist is signed by the energy auditor, crew leader, and the quality control inspector through the various stages of weatherization. If the state monitor chooses the job to monitor, they sign the Quality Control checklist as well.

As of February 2016, Michigan has 41 people with QCI certifications which is a 32% increase from the 14 that MI has certified in January 2015. Michigan does not have an accredited training center, so out of state travel is required for all JTA/HEP training and certifications. MI does have a training contract with INCAA and training is held in MI for JTA/HEP certifications for the network under this contract. Agencies are also working together to share energy auditors and QCIs for the Program Year 2016 to ensure compliance. MDHHS-BCAEO is partnering with Michigan Rehabilitation Services (MRS) to establish a DOE approved training center in Michigan.

Weatherization technical monitoring is conducted at minimum of once a year. This monitoring includes review of selected units to determine compliance with file documentation, work standard and quality standards. Audits and quality control inspections include Indoor Air Quality (IAQ) inspections. IAQ inspection requirements include completion of DHS forms 552 and 552A and ASHRAE 62.2 ventilation standard. Attendance and completion of the DHS IAQ (Indoor Air Quality) and LSW (Lead Safe Work Practices) training and testing is required for all DHS-certified weatherization auditors/inspectors, contractors and crew members as Tier 2 training.

Blower door testing of all homes is conducted during both the audit and inspection of the home by a MDHHS-BCAEO certified weatherization auditor/ QCI or crew person/contractor.

**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 does any one or more of the following:

1. Commits fraud or deceit with respect to any required license or permit application or an inspection report submitted to the Grantee or SOM;
2. Violates any state or federal law, rule, permit, or order relating to the inspection and/or installation of weatherization measures.
3. Makes a false or misleading statement in that portion of a written report that deals with professional qualification or in any testimony concerning professional qualifications;
4. Engages in an act or omission involving dishonesty, fraud, or misrepresentation with the intent to substantially benefit a home Energy auditor/QC inspector or other person or with the intent to substantially injure another person;
5. Engages in an act of fraud, misrepresentation, or deceit in the making of a home inspection;
6. Pays a finder's fee or a referral fee to a person in connection with an inspection of or work to be done on a residence;
7. Fails or refuses without good cause to exercise reasonable diligence in developing a home inspection report, preparing a report, or communicating a report;
8. Accepts a home inspection assignment when the employment itself is contingent upon the home Energy Auditor/QC Inspector reporting a predetermined estimate, analysis, or opinion or when the fee to be paid is contingent upon the opinion, the conclusions, analysis, or report reached or upon the consequences resulting from the assignment;
9. Performs work or improvement to a residence upon which the Energy Auditor/QC Inspector performed a home inspection within the previous 12 months;
10. Employs fraud, deceit, or misrepresentation in obtaining or attempting to obtain a license or renewal of a license including builder, mechanical, plumber, electrician, and maintenance and alteration licenses such as mobile home, insulator, window installer, etc.
11. Is responsible for citation of repeated (3 or more) findings in consecutive monitoring reports completed by either the grantee, DHS BCAEO or DOE;
12. Commits an act or acts of malpractice, gross negligence, or incompetence in the performance of home inspections;
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**Appeals Process**

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**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**STATE PLAN/MASTER FILE WORKSHEET**

**(Grant Number: EE0006161, State: MI, Program Year: 2016)**

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.

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#### Panel Review Process

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1. Convening of the panel
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#### Deliberation and Decision

1. The panel will review summary presentations, documentation and clarifications provided and render a decision.
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3. The panel spokesperson will communicate the panel's decision to the appellant and the BCAEO Director in writing.

#### Decertification Period

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

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

In the event of a QC Inspector suspension, a letter outlining the suspension will be provided to Michigan Weatherization Policy Advisory Council, Department of Energy and Michigan Community Action.

#### Subgrantee Agreement Language related to WPN15-4 requirements

##### 1.1. Controlling Authority

The Department of Energy (DOE), Weatherization Assistance Program for Low Income Persons (P.L. 94.385 of 1976 as amended); the DOE Weatherization Program Notices (WPNs) the State of Michigan Annual State Weatherization Plan (and any amendments); the State of Michigan LIHEAP State Plan (and any amendments); the Technical Weatherization Policy Manual & Standards (TWP); the Retrofitting Michigan: Standard Work Specifications Field Guide; the Community Services Policy Manual (CSPM); National Renewable Energy Laboratory Standard Work Specifications (SWS) and all applicable state-enabling and appropriate legislation are hereby incorporated by reference and shall be the controlling authority for all matters not specifically covered in this Agreement. The CSPM, as may be amended, will prevail when the manual has policy which contains additional requirements to the cited regulations below.

##### 2.4. Credentials

The Grantee shall assure that appropriately credentialed or trained staff under its control, including Grantee employees and/or subcontractors, shall perform functions under this Agreement. The Grantee must provide crews and/or subcontractors with technical requirements for field work including: audits/testing, installation of energy conservation, health and safety and incidental repair measures; and final inspections. The Grantee must confirm receipt of those requirements and provide follow-up and clarification upon request. A signature on a contract can serve as proof of receipt. The technical requirements must be clearly communicated and the specifications for work to be inspected must be referenced in the Grantee contracts. Contractors hired by the Grantee must have agreements that include the same technical requirements as listed above. The work on the contract must be consistent with the Grantee standards and field guides. All energy auditors, retrofit installers, crew leaders, and quality control inspectors must possess the knowledge, skills, and abilities in the National Renewable Energy Laboratory (NREL) Job Task Analysis (JTAs).

##### 2.5. Services to be Delivered

a. Activities the Grantee shall perform:

The Grantee shall weatherize eligible dwelling units and perform related services, as described in their Weatherization Assistance Program Service Plan, as approved by MDHHS. Plans must comply with State of Michigan and U.S. DOE policy, rules, and regulations, including the Community Services Policy Manual and U.S. DOE rules and regulations. The Grantee will maintain a basic service system which includes an outreach/intake system, a method of installing measures, audit, and final inspection procedures, and qualified crews and/or subcontractors.

\*Please see sample subgrantee contract SF424 Uploaded documents for full contract language.

**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**STATE PLAN/MASTER FILE WORKSHEET**  
**(Grant Number: EE0006161, State: MI, Program Year: 2016)**

**V.6 Weatherization Analysis of Effectiveness**

DHHS-BCAEO expects subgrantees to achieve 100% of their planned operational goals for fiscal expenditure, unit production and client priorities. It is also expected that each subgrantee will demonstrate adequate financial management controls to assure the accountability of its program effort. The following evaluation system has been developed to analyze current subgrantee performance and to assess viability for continued participation in the program.

BCAEO will utilize all tools below to analyze the effectiveness of subgrantee weatherization, productivity and energy savings between subgrantees, developing Training & Technical Assistance( T&TA) activities and priorities for the network, continuously strengthening the MI WAP, tracking performance, and managing and monitoring of the program and each subgrantee. All monitoring tools have been updated to reflect any program changes or requirements.

**On-site Inspections of Weatherized and In-Progress Units**

DHHS-BCAEO technical monitors inspect between 5%-10% of completed units for each subgrantee. 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. The in-progress monitoring is intended to serve as training and technical assistance.

DHHS-BCAEO technical staff monitor the effectiveness of Quality Control Inspectors by keeping a trend analysis for each agency. CSPM 618,1 has language stating that if it is found that an QCI is not performing to DOE program standards that the state has the right to suspend them from working in the program. There is also language as to how an inspector can appeal the process.

**Inspector Certification**

DHHS-BCAEO will make available training opportunities for the subgrantee network to provide HEP Quality Control Inspector training and certification opportunities. Contract language with subgrantees requires the use of a HEP certified QCI for all final inspections and the use of a separate energy auditor and QCI on each job to be weatherized.

**Program & Financial Monitoring**

Program and financial monitoring reviews are conducted with each subgrantee to evaluate the subgrantee's ability in the area of fiscal, administrative and programmatic compliance with all applicable federal and MDHS-BCAEO WAP rules and regulations. The monitoring reviews are a combination of onsite visits and desk reviews.

**Audits**

Each subgrantee required by the OMB Super Circular to have a single audit performed must submit the reporting package and an audit transmittal letter to the Michigan Department of Human Services Office of Quality Control and Internal Controls in accordance with the time frame established in the OMB Circular. When findings are identified in the single audit, they are referred to the WAP office. DHHS-BCAEO WAP fiscal staff then reviews the proposed corrective action for the finding and issues a management decision. Additionally, DHHS-BCAEO WAP fiscal staff reviews the single audits as a part of the fiscal monitoring process.

**Productivity**

Each subgrantee must maintain a rate of production to ensure that all DOE WAP funds are expended in a timely manner each program year. Productivity is monitored quarterly and quarterly desk reviews are sent to each subgrantee. If by the end of the second quarter, the subgrantee has low production, the subgrantee is required to submit a plan to MDHHS-BCAEO outlining their corrective action to meet the productivity requirements. It should be noted, for the Program Year of 2016, MDHHS-BCAEO may reallocate WAP funding from underperforming subgrantees and provide those dollars to subgrantees that are meeting or exceeding performance and the capacity to spend the funding out by the end of the program year.

**Trend Analysis/Performance Reviews**

The DHHS-BCAEO technical monitors are responsible for the development and maintenance of a trend analysis for each subgrantee. This information includes a collection of all observations, questioned costs, and/or best practices identified during monitoring visits and the staff and/or contractors directly responsible. This information is used to identify training and technical assistance needs, to identify and inform subgrantees of repeated performance issues with specific staff/contractors, and to identify and inform the network of trends that must be addressed. The DHHS-BCAEO staff use this information to make policy and procedure changes as appropriate and to assess network training needs throughout the program year. All technical monitoring is done within our statewide database and will allow the ability to track past years findings and Training and technical assistance provided to the agency. This was implemented in Program Year 2014.

Monitors prepare for each monitoring review by reviewing prior year's reports and corrective action plans. The reports contain problem areas (corrective action plans) that must be reviewed during the current monitoring evaluation. Monitoring reports will identify past monitoring findings in the prior findings section of the report for any previous findings. The monitor will then provide narrative on progress.

**Risk Assessments**

MDHHS-BCAEO will conduct annual risk assessments (or more if needed) for each subgrantee.

**Corrective Action**

If DHHS-BCAEO determines that the subgrantee administrative and/or financial operations are consistently out of compliance with program requirements and/or the subgrantee is not improving at an agreed upon plan, the subgrantee grant may be terminated in accordance with 10 CFR 440.15(3)(e). In order to ensure that there are not extended periods without service to any area, DHHS- BCAEO may appoint an interim provider until such time that the public process for identification of a permanent provider can be accomplished or corrections identified by the LWO have been made. 10 CFR 400.15 will be followed in selecting a permanent replacement provider. In the event the statewide Request for Weatherization Providers results in some areas not being served, DHHS-BCAEO may appoint a

**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**STATE PLAN/MASTER FILE WORKSHEET**

**(Grant Number: EE0006161, State: MI, Program Year: 2016)**

provider for those areas until another competitive bidding process is scheduled for the WAP.

The Grantee may be requested to provide corrective action as part of a Quality Improvement Plan (QIP) to MDHHS for programmatic reports indicating achievement of less than 50% of the quarterly plan at the end of the first quarter of each program year; at less than 70% of the year to date plan at the end of the second quarter of each program year, and at less than 80% of the year to date plan at the end of the third quarter of each program year.

MDHHS-BCAEO reserves the right to redistribute funds if a subgrantee is not able to meet production goals outlined in the subgrantee approved serviced plan. Any reallocation will be in an attempt to ensure proper utilization of WAP funds. Subgrantees eligible for redistributed funds will be determined based on, but not limited to, the following criteria:

Current level of expenditures for all active weatherization related programs

- timely and accurate submission of reports and Statement of Expenditures
- depth of existing waiting list
- met self-imposed benchmarks (identified in subgrantee production plan)
- financial and program management capacity

If carryover funds are available, funds will be distributed to eligible subgrantees based upon the approved allocation formula. Grantees on a Quality Improvement Plan (QIP) or fail to utilize 90% of their award at closeout will not be eligible to receive carryover funding.

**Utility Usage Data**

BCAEO will work with the Michigan Public Service Commission (MPSC) and Michigan Agency for Energy (MAE), utilities, and the FACSPRO system administrator to facilitate a dialogue between the entities to develop the process for collection of accurate utility usage data on the Michigan homes weatherized. These discussions have begun, and through continued work, MDHHS-BCAEO will ensure that data necessary to accurately assess the reduction in utility usage, as it relates to weatherization activities, becomes a reality in Michigan.

**V.7 Health and Safety**

The Michigan Health & Safety plan is an estimated 14.95% of program operations budget. Health and Safety (H&S) per unit maximum shall not exceed 50 percent of the total job costs without review and permission from a DHHS-BCAEO technical monitor. The Health and Safety plan and policy can be found in the TWP and the CSPM 600 Series which have been uploaded under SF-424. The Health and Safety Plan is also attached in SF-424.

Health and Safety funds may be used for:

- The elimination of energy related H&S hazards, that are necessary before or because of the installation of weatherization measures and,
- Lead Safe Weatherization (LSW).

To ensure that program services concentrate on energy efficient measures, any H&S measures must be modeled with a NEAT/MHEA energy audit, and not exceed 50 percent of the total job cost. If the costs exceed these limits, the job must be reviewed by MDHHS-BCAEO technical staff and approval must be given. Ventilation costs for indoor air quality are exempt when calculating 50 percent.

Subgrantees ask a series of questions during intake and energy audit related to occupant health conditions to capture any pre-existing conditions.

It should also be noted that Michigan climate does not warrant air conditioning replacement/installation, or repair.

If energy savings cannot be realized due to the condition of a home, these conditions shall be documented in the electronic file and the home shall not be weatherized. Such conditions shall be brought to the attention of the client with referrals to other help sources available.

ASHRAE 2013 compliance is outlined in the TWP and the CSPM (606 and 614) and on the H&S document uploaded in SF-424. DHHS-BCAEO provides ASHRAE training as a Tier 2 training to the network annually and as needed.

OSHA requirements are enforced by the MI OSHA office. DHHS-BCAEO hosts an annual weatherization conference and the MI OSHA office conducts training at the conference.

Sources:

[http://www.michigan.gov/documents/dhs/Technical\\_Weatherization\\_Policies\\_Manual\\_215832\\_7.pdf?20130911094855](http://www.michigan.gov/documents/dhs/Technical_Weatherization_Policies_Manual_215832_7.pdf?20130911094855)  
[http://www.michigan.gov/dhs/0,4562,7-124-5455\\_7199\\_45583\\_45584---00.html](http://www.michigan.gov/dhs/0,4562,7-124-5455_7199_45583_45584---00.html)

**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**STATE PLAN/MASTER FILE WORKSHEET**

(Grant Number: EE0006161, State: MI, Program Year: 2016)

**V.8 Program Management**

**V.8.1 Overview and Organization**

The Weatherization Assistance Program is managed by the Michigan Department of Health and Human Services (DHHS). Within DHHS, the program administration falls under the Bureau of Community Action and Economic Opportunity (BCAEO). The Department of Health & Human Services focuses on health services in Michigan along with assistance for low income individuals with programs such as Food Assistance Program, cash assistance, emergency services, etc.

The BCAEO was created by the state legislature to oversee activities of Michigan Community Action Agencies (CAAs). CAA services include programs that address education, emergency services, employment, health, housing, income management, linkages, nutrition, and self-sufficiency. CAAs are the primary subgrantee for the WAP.

DHHS-BCAEO staff oversee several federal and state contracts with CAAs and provide written policy and procedures for these various program areas. These programs include LIHEAP Weatherization funds, the Community Services Block Grant, and the Michigan Energy Assistance Program. DHHS-BCAEO staff provides training to CAA staff on contract related policy, eligibility issues, etc. and technical weatherization staff deliver training and conduct review for state inspector certification. DHHS-BCAEO staff conduct annual monitoring visits to each subgrantee.

The DHHS-BCAEO Director, Kris Schoenow, oversees all personnel within the BCAEO. Personnel include grant managers, financial monitors, programmatic monitors, technical weatherization monitors, a CSBG specialist, and a weatherization specialist, along with clerical staff.

The DHHS-BCAEO Organizational Chart has been attached to SF-424.

**V.8.2 Administrative Expenditure Limits**

Per 10 CFR 440.1818(d), not more than 5% of the grant can be used for administrative purposes by the state.

Standard allowed administrative allocation is 5% of subgrantees total allocation. Subgrantees receiving less than \$350,000 receive additional administrative dollars based on the limits below:

- Grant of \$200,000 or less - 5%
- Grant of \$200,000 to \$249,000 - 3%
- Grant of \$250,000 to \$299,000 - 2%
- Grant of \$300,000 to \$349,000 - 1%

CSPM 402.2 provides subgrantee policy regarding administrative expenditure limits.

**V.8.3 Monitoring Activities**

Attached to the SF-424 are the following:

- Fiscal Monitoring Tool
- Programmatic Monitoring Tool
- Sample Technical Monitoring Tool
- Sample Technical Annual Monitoring Tool
- Bureau Technical Monitoring Plan
- Bureau Programmatic and Financial Monitoring Plan



**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**STATE PLAN/MASTER FILE WORKSHEET**

**(Grant Number: EE0006161, State: MI, Program Year: 2016)**

All monitoring is conducted in accordance with the guidance in WPN (Weatherization Program Notice) 16-4. The combined program compliance monitoring and technical monitoring will satisfy the DOE monitoring requirements. For PY16 it is estimate that a minimum of 30% of T&TA funds will be spent on monitoring. All monitoring tools have been updated to reflect DOE program requirements.

The DHHS-BCAEO has three technical monitors, two programmatic monitors and two fiscal monitors. Technical monitors, program compliance monitors, and fiscal monitors will monitor the weatherization program. DHHS-BCAEO monitoring policy requires the offer of an entrance and exit interview with the executive director and/ or designated staff after each monitoring visit. For technical monitoring, a weatherization monitoring report, including observations and corrective action requirements, is completed by the technical staff. After agency technical responses have been received, a Quality Assurance letter is composed and includes all outstanding observations and findings. This document is reviewed by supervisory staff and forwarded to the agency's executive director with a copy to the weatherization coordinator. (A copy of the program compliance monitoring report is also shared with the Subgrantee Board Chair, if applicable.) DHHS-BCAEO will issue a report within 30 days after each monitoring visit. A written response to corrective action will be required of agencies within 30 days of receipt of the monitoring report. MDHS-BCAEO utilizes a monitoring module in the statewide database which expedites monitoring and also provides better tracking for DHHS-BCAEO staff and for subgrantees. As of July 1, 2015, all DHHS-BCAEO technical monitors providing monitoring for WAP file and site visits much have a QCI certification. DHHS-BCAEO Technical staff is required to perform all diagnostic testing along with monitoring all installed measures to ensure they have been correctly installed. They technical staff takes photographs during monitoring and also conducts file reviews to ensure subgrantee compliance. The combined program compliance monitoring and technical monitoring will satisfy the DOE monitoring requirements. The agency to be monitored is normally, but not always, informed prior to the visit by contacting the executive director or his/her designee.

Weatherization technical monitoring will be conducted for each subgrantee a minimum of once a year for the following: review of materials for compliance with audit specifications, review of quality control system and procedures, inspection of selected houses to determine compliance with file documentation work standards and quality standards, check of jobs in progress, safe work practices and mandatory training requirements. Contractor licensing, insurance and training requirements are also reviewed. Additional visits will be conducted for subgrantees that are determined to have significant deficiencies. Additional days may be added to the agency visit if monitoring results in a need for additional T&T/A for the agency. Reviews will be completed on-site for at least 5% of the completed units.

Weatherization compliance and financial monitoring will be conducted with the subgrantee a minimum of once a year. Additional reviews will be conducted for subgrantees that are determined to have significant deficiencies. The monitor prepares for the field visit by reviewing contract files to determine the reporting and financial status of the agency. Previous monitoring reports, including corrective action requirements, correspondence, and new items are reviewed. The monitor reviews files for completeness and accuracy of eligibility documentation, programmatic compliance, and financial compliance. Subgrantees are required to have a single audit performed in accordance with OMB Super Circular, as applicable. The subgrantees are responsible for obtaining their own audit services. DHHS-BCAEO receives a copy of the audit report and performs audit resolution.

The subgrantee to be monitored is normally, but not always, informed prior to the visit by contacting the executive director or his/her designee. Site visits are coordinated through agency staff. Tentative monitoring schedules are set early in the program year.

Monitors may leave an unofficial copy of the report with the agency executive director with any observations they have found and suggested corrective action. Depending on the type of monitoring (programmatic, technical, fiscal) the subgrantee has a specified amount of days to complete the corrective action and provide proof to the monitor. The amount of days for response varies depending on the type of monitoring. Upon response from the agency, the monitor has so many days to ensure the corrective action has been made and to respond as to whether they accept the actions or not and if any further/additional assistance or information is needed.

If it is found that a subgrantee has significant deficiencies, DHHS-BCAEO will establish a Quality Improvement Plan (QIP) for the subgrantee and increase monitoring to address said deficiencies until the DHHS-BCAEO determines the agency has improved. It is expected that with the implementation of the in-progress monitoring, that DHHS-BCAEO will be able to identify deficiencies earlier, rather than later for each agency, if they exist.

The CSPM provides policy for monitoring.

Technical monitoring will be performed to ensure compliance with all DOE WAP, U.S. Health and Human Services (HHS) regulations and guidance, and SOM and MDHS-BCAEO 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
- 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 SIR generated IWC Work Order(s) including change orders)
- Quality control procedures
- Approved audit Inspection, Work Order, Cost Center (IWC) completeness and storage in the BCAEO Excel format using FACSPRO
- Financial reconciliation for all job cost and invoicing reported on IWC document Cost Center tab
- Compliance with blower door testing requirements • Combustion appliance testing protocol
- Correct audit selection & completion
- Optional: An in progress site visit with the contractor/crew (working)
- Trend analysis of best practices, observations, questioned costs, or findings

File selection and review will be via FACSPRO and based upon 10% of scheduled production. Site review will be based upon 5% or more if appropriate, of scheduled production and/or one completed site visit per contractor/crew To provide adequate oversight, it is the subgrantee'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

**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**STATE PLAN/MASTER FILE WORKSHEET**

**(Grant Number: EE0006161, State: MI, Program Year: 2016)**

and regulations.

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

- Procedures to ensure that agreements are entered into only with competent subcontractors.
- A system for monitoring subcontractors and dwelling units.
- A system to provide technical assistance to subcontractors as needed.
- Documentation of all monitoring and technical assistance provided, to include at a minimum, who was trained on what subject on what date.
- 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.

Technical monitor positions are funded 100% with T&TA funding. All travel is 100% DOE funding unless other funding is available such as LIHEAP. If LIHEAP is available during the program year, the expenses are shared depending on the activity. This is tracked by Personal Activity Reports submitted by staff to the DHHS Federal Reporting office.

Program and financial monitor positions are funded approximately 40% of their salary with DOE Admin funds and 10% with T/TA funding. Travel for monitoring purposes is shared between all active grants which can include LIHEAP, CSBG, and DOE. To the extent possible, monitoring activities will be done by desk review using the statewide FACSPRO database. This is a cost effective way of monitoring. DHHS-BCAEO Weatherization Specialist will request an exception to DHHS travel rules which require a monitor travel more than 100 miles before having permission to spend the night. The exception request will ask for permission or monitor overnights at 50 miles or more from the designated work location. This will allow monitoring to be completed in full 8 hour work days rather than 5-6 hour work days with 3-4 hours a day dedicated to commuting. This will allow for more efficient monitoring in a timelier manner.

Grant managers positions are funded with approximately 40% of their salary with DOE Admin funding and 10% T/TA funding. This amount can change yearly depending on funding awarded to the DHHS-BCAEO from other funding sources. The rest of their salary is compensated with Community Services Block Grant (CSBG) and LIHEAP funding.

The weatherization program specialist position is funded with approximately 50% DOE admin and 50% DOE T/TA for the monitoring oversight and training.

The MDHS-BCAEO director position salary is funded by 50% of total salary with DOE admin.

The MDHS-BCAEO monitoring schedule is available in SF-424.

Community Services Policy Manual 600 Series

[http://www.michigan.gov/dhs/0,4562,7-124-5455\\_7199\\_45583\\_45584---,00.html](http://www.michigan.gov/dhs/0,4562,7-124-5455_7199_45583_45584---,00.html)

[http://www.michigan.gov/documents/mdhhs/CSPM\\_1300\\_Series\\_503778\\_7.pdf](http://www.michigan.gov/documents/mdhhs/CSPM_1300_Series_503778_7.pdf)

#### **V.8.4 Training and Technical Assistance Approach and Activities**

WPN 15-4 Section 4: Provide Training to Implement and Maintain Guidelines/Standards DHHS-BCAEO has created the following comprehensive training plan for PY16 which include both Tier 1 and Tier 2 identified training. This training plan will ensure that all Tier 1 training paid for with WAP T&TA funds must meet requirements of this section. Dates are subject to change based on trainer availability and network need.

Michigan has 41 certified Quality Control inspectors (QCI) in Michigan. Three of those are state technical monitors. 39/26 subgrantees = 1.5 QCI's per agency.

Subgrantees and their contractors complete retention agreements prior to the subgrantee paying for training for contractors.

MDHHS-BCAEO is currently working with the Michigan Rehabilitation Services (MRS) in a partnership to use their training facility for Weatherization workers. The facility is equipped with Weatherization training demos which would allow MDHHS-BCAEO to provide more efficient training to workers. Additionally, the site would be used when INCAA provides Tier 1 training in Michigan. MDHHS-BCAEO will utilize DOE funds to establish the MRS training center as a DOE approved training center and BPI test site.

Tier 1 Training Plan:

September/October 2016 (Tier 1): Quality Control Inspector Training, Energy Auditor Training provided in Michigan by INCAA, the DHHS-BCAEO contracted training center.

October 2016 (Tier 1): BCAEO will hold the annual MI Weatherization conference. DHHS-BCAEO will have INCAA, the contracted trainers, to provide Tier 1 training which includes a comprehensive, occupation specific training which follows a curriculum aligned with the JTAs and any other Tier 1 training necessary to strengthen the Michigan WAP. Training needs will be identified through the trend analysis created by each technical monitor and quarterly training survey results.

**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**STATE PLAN/MASTER FILE WORKSHEET**

**(Grant Number: EE0006161, State: MI, Program Year: 2016)**

Federal and state procurement policy will be followed.

October/November 2016 (Tier 1): Retrofit Installer Training provided by INCAA per contract.

March 2017 (Tier 1): Energy Auditor Training and Retrofit Installer Training provided by INCAA per contract. April/May 2017 (Tier 1): Quality Control Inspector Training provided by INCAA per contract.

Tier 2 Training: DHHS-BCAEO will also provide Tier 2 training not only at the annual Weatherization conference, but also throughout the year as needed. Technical monitors will continue to provide quarterly LSW training and IAQ training to the network. They will also provide statewide database training, NEAT/MHEA training, Policy update training and monitoring update training. Technical monitors will utilize trend analysis to identify areas of training an agency may need.

DHHS-BCAEO will provide SWS, blower door, combustion appliance zone (CAZ), JTAs, ASHRAE 62.2, Health & Safety, FACSPRO, Policy updates, managing weatherization, and any other training identified as needed by the network in quarterly training surveys. DHHS-BCAEO staff has been coordinating efforts with the Michigan Rehabilitation Services (MRS) to utilize their Weatherization technical training center as a WAP Training Center throughout the year. DHHS-BCAEO and MRS are working together to establish costs and determine a plan to benefit both MRS WAP trainees and current WAP subgrantee contractors and crews. Additionally, DHHS-BCAEO staff will provide training such as DHHS-BCAEO financial, DHHS-BCAEO policy, fiscal/grant monitoring training, income eligibility training, and any other training that is identified by the network including T&TA through monitoring. DHHS-BCAEO will also contract with a company to provide customer service/customer interaction based training to strengthen client relations. Federal and state procurement policy will be followed. DHHS-BCAEO provides training in many formats including online, on-site, teleconference, and webinar.

DHHS-BCAEO Financial monitors will provide WAP financial training at the annual state Weatherization conference in October, 2016.

All training needs are determined by several methods including but not limited to:

- Review of subgrantee deficiencies
- Subgrantee direct training requests
- Involvement of T/TA subcontractor
- Formal and Informal quarterly training survey needs
- Recommendations resulting from external entities (DOE staff, contractors, auditors, etc.)
- Changes in DOE Requirements.

Attendance at state-sponsored training may be required on a case-by-case basis to help correct program deficiencies or to ensure competence in specific areas. In such cases, subgrantee and delegate attendance will be required as a matter of program compliance. Additionally, Michigan will provide T&T/A funds for each LWO directly in the amount of \$15,000 to assist with additional training costs to meet certification requirements. Also, to ensure funding so that staff can attend DOE approved national weatherization related conferences.

MDHHS-BCAEO requires that all weatherization workers complete LSW and IAQ training within 90 days of hire.

Subgrantees maintain certifications and training for staff in the statewide database, FACSPRO. The subgrantees also maintain contractor files which hold all required certifications. This is monitored by MDHHS-BCAEO monitoring staff annually.

As MDHHS-BCAEO continues to move forward with updates to our Weatherization statewide database which will allow energy savings for each household to be measured and to tell a better story of the success of Weatherization in Michigan. Additionally, the PAC is working on partnerships with energy companies with the intent to collect savings data for each household weatherized.

All contracted training will comply with federal and state procurement guidance and policy.

MDHHS-BCAEO is currently working on establishing a training center in Michigan with Michigan Rehabilitation Services (MRS). This program has an existing Weatherization training center and the MDHHS BCAEO Weatherization Specialist is meeting with MRS to share the training center in an effort to make training more available to the network. Additionally, MRS currently has several accreditations for their training facility and is in discussion to work toward and IREC accreditation. MDHHS-BCAEO will continue discussions regarding expenses and funding for a state training center with MRS. Funding is outlined in the budget.

MDHHS-BCAEO will procure and online testing system separate from the Child Welfare training system, which is currently being utilized. MDHHS will utilize online training and testing initially for LSW, IAQ, and add courses such as Client Education, and Weatherization Management along the way. MDHHS-BCAEO will obtain an online training program using proper and allowable procurement practices.

#### Client Education

T&T/A is also used to provide Client Education to the WAP client. The Client Education is outlined in the Community Services Policy Manual 600 Series and guides subgrantees as to the proper methods of Client Education. Below is an excerpt: Client 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.

**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**STATE PLAN/MASTER FILE WORKSHEET**

**(Grant Number: EE0006161, State: MI, Program Year: 2016)**

The following minimum steps related to intake must be included in the grantee's energy education plan.

1. Introduce the WAP. 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, DHS4283.
3. Retain the signed WAP application or signed FACSPRO client intake report with the Weatherization disclaimer in the client file.
4. Determine eligibility and prioritize the applicant. See CSPM Item 611 regarding the client priority system.
5. Notify the applicant of the eligibility determination.
6. Ask the applicant to prepare for the audit by:
  - Making a list of energy questions and concern
  - Making the attic, basement, and crawl space accessible
  - Making the perimeter accessible
  - Securing pets
  - Planning to be home and ready to participate

#### Home Energy Audit

It is important that the client be involved in the home energy 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 WAP, stressing what each partner will do during each step.
2. Explain the agenda of the audit and what the client will need to do.
3. 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.
4. Complete the audit.
5. Summarize the results of the audit for the client. 1) Explain the nature of the work that may be done on the home. 2) If the client is actively participating, agree on three energy action steps for the client to do. 3) 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. 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.
5. A generic letter to be provided to the client after the weatherization measures are completed.
6. An illustrated guide for maintaining the weatherization measures installed.
7. A follow up survey.

#### Productivity Vs. Energy Savings

BCAEO is working toward investment into a program that will computer energy savings by household, subgrantee, and energy auditor for the PY16 year. BCAEO has been working with neighboring states to determine the best method for Michigan.

ASHRAE 62.2 2016

Michigan will create training and implement ASHRAE 2016 July 1, 2017.

**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**STATE PLAN/MASTER FILE WORKSHEET**

**(Grant Number: EE0006161, State: MI, Program Year: 2016)**

**Grantee/Subgrantee Training Tracking System**

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

**V.9 Energy Crisis and Disaster Plan**

**PURPOSE**

To provide guidance on allowable activities using Department of Energy (DOE) Weatherization Assistance Program (WAP) resources to low income individuals and families in the event of disasters as declared by the President of the United States or the State of Michigan Governor.

**POLICY**

All Grantees of the Weatherization Assistance Program (WAP) must adhere to the following policy if considering requesting weatherization funding toward disaster planning and relief. Disaster relief funds are to be used only in the event of a declared emergency at the state or federal level and shall be used only to provide emergency services to low income individuals and families in the designated disaster area. WAP has a very limited role in any disaster response plan. DOE funds are very limited to eligible weatherization activities and the purchase and delivery of weatherization materials.

To the extent services are in support of eligible weatherization (or permissible reweatherization) work for eligible households, such expenditure is allowable.

Allowable expenditures under WAP include:

- The cost of incidental repairs to an eligible dwelling unit if such repairs are necessary to make the installation of weatherization materials effective.
- The cost of eliminating health and safety hazards, elimination of which is necessary before the installation of weatherization materials.
- Weatherization personnel can be paid from DOE funds to perform functions related to protecting the DOE investment. Such activities include: securing weatherization materials, tools, equipment, weatherization vehicles, or protection of local agency weatherization files, records and the like during the initial phase of the disaster response.
- Local agencies may use weatherization vehicles and/or equipment to help assist in disaster relief provided the WAP is reimbursed according to the DOE regulations.

The use of DOE funds for relief efforts is limited to the following:

- The total allowance for relief efforts limited to allowance of \$6500 per dwelling unit.
- The total allowance for incidental repairs in support of installation of weatherization materials is limited to the current maximum reimbursement for minor envelope repairs per contract and policy language.
- The total allowance for installation of each weatherization measure if limited to the current maximum reimbursement Grantee contract.

To the extent that the services are in support of eligible weatherization (or permissible re-weatherization) work, such expenditure would be allowable. For example, debris removal at a dwelling unit so that the unit can be weatherized would be an allowable cost. Debris removal from a dwelling unit that is not to be weatherized would not be an allowable cost. As such, *using DOE funds to pay for weatherization personnel to perform relief work in the community as a result of a disaster is not allowable.*

**Reprioritization of Weatherization requests**

For reprioritization of weatherization requests coming from the disaster area, WAP rules require that priority be given to identifying and providing weatherization assistance to elderly persons, persons with disabilities, families with children, high residential energy users, and households with high energy burdens (10 CFR 440.16 (b)). However, it would be permissible to consider households located in the disaster area a priority as long as the households are eligible and meet one of the priorities established in regulation and are free and clear of any insurance claim or other form of compensation resulting from damage incurred from the disaster.

**Reweathering work**

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

**U.S. Department of Energy**  
**WEATHERIZATION ASSISTANCE PROGRAM (WAP)**  
**STATE PLAN/MASTER FILE WORKSHEET**

**(Grant Number: EE0006161, State: MI, Program Year: 2016)**

- 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, can allocate additional funds to a designated disaster site during a reallocation process throughout the year.

## CSPM 614 Attachment A

### Budgeting (Check one):

Separate Health & Safety Budget

Contained in Program Operations

### Incidental Repairs:

No additional items to be included.

### Health and Safety Expenditure Limits

Per-Unit Average Percent: 14.95% The job Health & Safety maximum amount shall not exceed more than 50% of the total job costs. If costs exceed these limits, BCAEO technical staff must review and approve.

### Deferral Policy

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

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

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

# CSPM 614 Attachment A

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

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

### Deferral Notification Requirements

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

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

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

### Procedure for Identifying Occupant Health Concerns:

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

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

Yes

No

## How the WPN 11-6 requirements will be addressed.

### Air Conditioning and Heating Systems

#### Concurrence or Alteration:

Concur with WPN11-6

Alternative Guidance

#### Funding:

DOE funds are being used.

#### Beyond Scope of DOE WAP:

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

#### Standards for Remedy:

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

#### Standards for Deferral:

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

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



# CSPM 614 Attachment A

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

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

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

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

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

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

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

## Standards for Referral:

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

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

## Training Provision:

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

## Client Education:

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

## Disposal Procedures:

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

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

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

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

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

## Appliances and Water Heaters

### Concurrence or Alteration:

Concur with WPN11-6



Alternative Guidance



### Funding:

DOE funds are being used.

### Beyond Scope of DOE WAP:

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

### Standards for Remedy

# CSPM 614 Attachment A

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

**Standards for Deferral:**

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

**Standards for Referral:**

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

**Training Provision**

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

**Client Education:**

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

**Disposal Procedures:**

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

## Asbestos - in siding, walls, ceilings, etc.

**Concurrence or Alteration:**

Concur with WPN11-6



Alternative Guidance



**Funding:**

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

**Beyond Scope of DOE WAP:**

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

**Standards for Remedy:**

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

**Standards for Deferral:**

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

**Standards for Referral:**

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

**Training Provision:**

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

**Client Education:**

Referral to the local Health Department is recommended.

**Disposal Procedures:**

# CSPM 614 Attachment A

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

## Asbestos - in vermiculite

### Concurrence or Alteration:

Concur with WPN11-6



Alternative Guidance



### Funding:

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

### Beyond Scope of DOE WAP:

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

### Standards for Remedy:

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

### Standards for Deferral:

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

### Standards for Referral:

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

### Training Provision:

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

### Client Education:

Referral to the local Health Department is recommended.

### Disposal Procedures:

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

## Asbestos - on pipes, furnaces, other small covered surfaces

### Concurrence or Alteration:

Concur with WPN11-6



Alternative Guidance



### Funding

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

### Beyond Scope of DOE WAP:

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

### Standards for Remedy:

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

# CSPM 614 Attachment A

**Standards for Deferral:**

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

**Standards for Referral:**

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

**Training Provision:**

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

**Client Education**

Referral to the local Health Department is recommended.

**Disposal Procedures:**

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

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

**Concurrence or Alteration:**

Concur with WPN11-6



Alternative Guidance

**Funding:**

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

**Beyond Scope of DOE WAP:**

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

**Standards for Remedy:**

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

**Standards for Deferral**

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

**Standards for Referral:**

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

**Training Provision:**

Through local Health Department and the State Extension office

**Client Education**

EPA handout on remedying Mold and mildew issues when applicable.

**Disposal Procedures:**

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

# CSPM 614 Attachment A

## Building Structure and Roofing

### Concurrence or Alteration

Concur with WPN11-6



Alternative Guidance



### Funding:

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

### Beyond Scope of DOE WAP:

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

### Standards for Remedy:

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

### Standards for Deferral:

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

### Standards for Referral:

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

### Training Provision:

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

### Client Education

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

### Disposal Procedures:

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

## Code Compliance

### Concurrence or Alteration

Concur with WPN11-6



Alternative Guidance



### Funding:

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

### Beyond Scope of DOE WAP:

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

### Standards for Remedy:

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

### Standards for Deferral:

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

# CSPM 614 Attachment A

## Standards for Referral:

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

## Training Provision:

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

## Client Education:

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

## Disposal Procedures:

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

## Combustion Gases

### Concurrence or Alteration:

Concur with WPN11-6



Alternative Guidance



### Funding:

DOE funds are being used.

### Beyond Scope of DOE WAP:

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

### Standards for Remedy:

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

### Standards for Deferral:

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

### Standards for Referral:

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

### Training Provision:

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

### Client Education:

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

### Disposal Procedures:

Field Standard will identify disposal procedures when applicable.

### Combustion Gas Problem Discovery

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

# CSPM 614 Attachment A

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

### Concurrence or Alteration:

Concur with WPN11-6



Alternative Guidance



### Funding:

DOE funds are being used.

### Beyond Scope of DOE WAP

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

### Standards for Remedy:

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

### Standards for Deferral:

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

### Standards for Referral:

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

### Training Provision:

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

### Client Education:

EPA handout on remedying Mold and mildew issues when applicable.

### Disposal Procedures:

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

## Electrical, other than Knob-and-Tube Wiring

### Concurrence or Alteration:

Concur with WPN11-6



Alternative Guidance



### Funding:

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

### Beyond Scope of DOE WAP:

Project will be deferred.

### Standards for Remedy:

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

# CSPM 614 Attachment A

**Standards for Deferral:**

When the scope of work exceeds incidental cost budget.

**Standards for Referral:**

When the scope of work exceeds incidental cost budget.

**Training Provision:**

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

**Client Education:**

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

**Disposal Procedures:**

Field Standards

## Electrical, Knob-and-Tube Wiring

**Concurrence or Alteration:**

Concur with WPN11-6 <input checked="" type="checkbox"/>	
Alternative Guidance <input type="checkbox"/>	

**Funding:**

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

**Beyond Scope of DOE WAP:**

Project will be deferred.

**Standards for Remedy:**

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

**Standards for Deferral:**

When the scope of work exceeds incidental cost budget.

**Standards for Referral:**

When the scope of work exceeds incidental cost budget.

**Training Provision:**

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

**Client Education:**

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

**Disposal Procedures:**

Field Standards

## Fire Hazards

**Concurrence or Alteration:**



# CSPM 614 Attachment A

Concur with WPN11-6 <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/>	
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**Funding:**

DOE funds shall be utilized within incidental repair limits

**Beyond Scope of DOE WAP:**

Project will be deferred.

**Standards for Remedy:**

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

**Standards for Deferral:**

When the scope of work exceeds the budgeted cost category.

**Standards for Referral:**

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

**Training Provision:**

DOE funds will not be utilized in training.

**Client Education:**

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

**Disposal Procedures:**

Field Standards.

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

**Concurrence or Alteration:**

Concur with WPN11-6 <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/>	
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**Funding:**

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

**Beyond Scope of DOE WAP:**

All work shall be deferred.

**Standards for Remedy:**

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

**Standards for Deferral:**

When the listed Hazard is present on site.

**Standards for Referral**

When the listed Hazard is present on site.

# CSPM 614 Attachment A

**Training Provision:**

DOE funds will not be used.

**Client Education:**

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

**Disposal Procedures:**

Field Standard

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

**Concurrence or Alteration:**

Concur with WPN11-6 <input checked="" type="checkbox"/>	
Alternative Guidance <input type="checkbox"/>	

**Funding:**

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

**Beyond Scope of DOE WAP:**

All work shall be deferred.

**Standards for Remedy:**

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

**Standards for Deferral:**

When the listed Hazard is present on site.

**Standards for Referral:**

When the listed Hazard is present on site.

**Training Provision:**

DOE funds will not be used.

**Client Education:**

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

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

Field Standard

**Lead Based Paint**

**Concurrence or Alteration:**

Concur with WPN11-6 <input checked="" type="checkbox"/>	
Alternative Guidance <input type="checkbox"/>	

**Funding:**

DOE funds are being used.

# CSPM 614 Attachment A

<b>Beyond Scope of DOE WAP:</b>
Work shall be deferred until remedy is reached.
<b>Standards for Remedy:</b>
LSW work practices shall be utilized.
<b>Standards for Deferral:</b>
When scope of work exceeds Health and Safety budget limits.
<b>Standards for Referral:</b>
A Notice of Potential Hazard is issued.
<b>Training Provision:</b>
LSW training is administered through the State of Michigan WAP. RRP training provided through EPA accredited trainers. Training requirements are listed in TWP section 4504.
<b>Client Education:</b>
Issue EPA pamphlet or safe work practices around the home.
<b>Disposal Procedures:</b>
Field Standard
<b>Lead Based Paint Compliance:</b>
Listed in SOM Technical Weatherization Policies and Community Services Policy Manual.

## Mold and Moisture

<b>Concurrence or Alteration:</b>				
<table border="1"><tr><td>Concur with WPN11-6 <input checked="" type="checkbox"/></td><td></td></tr><tr><td>Alternative Guidance <input type="checkbox"/></td><td></td></tr></table>	Concur with WPN11-6 <input checked="" type="checkbox"/>		Alternative Guidance <input type="checkbox"/>	
Concur with WPN11-6 <input checked="" type="checkbox"/>				
Alternative Guidance <input type="checkbox"/>				
<b>Funding:</b>				
DOE Funds will not be used beyond incidental repairs. Other funds may be available and utilized.				
<b>Beyond Scope of DOE WAP:</b>				
Defer all work				
<b>Standards for Remedy:</b>				
Visual inspection and issuance of EPA guidelines/pamphlet for remedy.				
<b>Standards for Deferral:</b>				
When area of mold exceeds 10 square feet, a deferral of all work will become effective.				
<b>Standards for Referral:</b>				
A Notice of Potential Hazard is issued.				
<b>Training Provision:</b>				
SOM will provide the EPA/DOE IAQ Training curriculum				
<b>Client Education:</b>				

# CSPM 614 Attachment A

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

## Disposal Procedures:

Field Standard

## Mold Protocols:

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

## Occupant Preexisting or Potential Health Conditions

### Concurrence or Alteration:

Concur with WPN11-6



Alternative Guidance



### Funding:

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

### Beyond Scope of DOE WAP:

Defer all work.

### Standards for Remedy:

Defer all work.

### Standards for Deferral:

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

### Standards for Referral:

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

### Training Provision:

Training will not be provided using DOE WAP funding.

### Client Education:

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

### Disposal Procedures:

Field Standards

## Occupational Safety and Health Administration (OSHA) and Crew Safety

### Concurrence or Alteration:

Concur with WPN11-6



Alternative Guidance



### Funding:

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

### Beyond Scope of DOE WAP:

# CSPM 614 Attachment A

Training costs are a support cost and will be covered within T/TA budget.	
<b>Standards for Remedy</b>	
State of Michigan Technical Weatherization conduct onsite monitoring visits to provide T/TA. The State of Michigan has it's own OSHA office which conducts training and oversight for worker safety.	
<b>Standards for Deferral:</b>	
NA	
<b>Standards for Referral</b>	
Refer workers to OSHA training centers.	
<b>Training Provision:</b>	
Through MIOSHA	
<b>Client Education:</b>	
NA	
<b>Disposal Procedures:</b>	
NA	
<b>OSHA and MSDS Compliance:</b>	
This is detailed in SOM Technical Weatherization Policy and Retrofitting Michigan- Technical Weatherization Field Guide	
<b>Pests</b>	
<b>Concurrence or Alteration:</b>	
Concur with WPN11-6 <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/>	
<b>Funding:</b>	
DOE funds will not be used. Local Health Department funding or other local funds when available.	
<b>Beyond Scope of DOE WAP:</b>	
All work will be deferred until all Pests are eliminated from work site.	
<b>Standards for Remedy:</b>	
Issue a Notice of Potential Hazard to the occupant.	
<b>Standards for Deferral:</b>	
When pests and their byproducts are present and pose a hazard to workers and inspection staff.	
<b>Standards for Referral:</b>	
When pests and their byproducts are present and pose a hazard to workers and inspection staff.	
<b>Training Provision:</b>	
OSHA training may be utilized.	
<b>Client Education:</b>	
A Notice of Potential Hazard may be issued.	

# CSPM 614 Attachment A

**Disposal Procedures:**

NA

**Radon**  
**Concurrence or Alteration:**

Concur with WPN11-6 <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/>	
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**Funding:**

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

**Beyond Scope of DOE WAP:**

A referral will be made to the Local Health Department.

**Standards for Remedy:**

All WAP services will be deferred.

**Standards for Deferral:**

If Radon is suspected to be present on site.

**Standards for Referral:**

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

**Training Provision:**

DOE funds will not be used for this training.

**Client Education:**

Recommendation to local licensed authority for testing protocol.

**Disposal Procedures:**

NA

**Refrigerant**  
**Concurrence or Alteration:**

Concur with WPN11-6 <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/>	
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**Funding:**

NA

**Beyond Scope of DOE WAP:**

NA

**Standards for Remedy:**

NA

# CSPM 614 Attachment A

## Standards for Deferral:

NA

## Standards for Referral

NA

## Training Provision:

NA

## Client Education:

NA

## Disposal Procedures:

NA

## Smoke, Carbon Monoxide Detectors, and Fire Extinguishers

### Concurrence or Alteration:

Concur with WPN11-6



Alternative Guidance



### Funding:

DOE funds are being used.

### Beyond Scope of DOE WAP:

Local enforcement may require interconnected alarms.

### Standards for Remedy

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

#### **2101-3 CARBON MONOXIDE (CO) ALARM /DETECTOR**

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

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

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

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

# CSPM 614 Attachment A

**Standards for Deferral:**

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

**Standards for Referral:**

When scope of work exceeds H&S budget category.

**Training Provision:**

Training is provided utilizing DOE Grant funds.

**Client Education:**

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

**Disposal Procedures:**

Field Standard

**Smoke/CO Detector Installation:**

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

## Solid Fuel Heating (Wood Stoves, etc.)

**Concurrence or Alteration:**

Concur with WPN11-6



Alternative Guidance

**Funding:**

DOE funds are being used within budget limits.

**Beyond Scope of DOE WAP:**

Deferred.

**Standards for Remedy:**

Issue a Notice of Potential Hazard to occupant.

**Standards for Deferral:**

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

**Standards for Referral:**

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

**Training Provision:**

DOE funds would be used in training QC Inspector candidates.

**Client Education:**

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

**Disposal Procedures:**

Field Standard.



# CSPM 614 Attachment A

## Space Heaters, Stand Alone Electric

### Concurrence or Alteration:

Concur with WPN11-6



Alternative Guidance



### Funding:

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

### Beyond Scope of DOE WAP:

Defer all WAP services.

### Standards for Remedy:

Issue a Notice of Potential Hazard to occupants.

### Standards for Deferral:

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

### Standards for Referral:

When a permanent heat source cannot be installed.

### Training Provision:

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

### Client Education:

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

### Disposal Procedures:

Field Standard

## Space Heaters, Unvented Combustion

### Concurrence or Alteration:

Concur with WPN11-6



Alternative Guidance



### Funding:

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

### Beyond Scope of DOE WAP:

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

### Standards for Remedy:

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

### Standards for Deferral:

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

# CSPM 614 Attachment A

## Standards for Referral:

When a permanent heat source cannot be installed.

## Training Provision:

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

## Client Education:

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

## Disposal Procedures:

Field Standards

## Space Heaters, Vented Combustion

### Concurrence or Alteration:

Concur with WPN11-6



Alternative Guidance



### Funding:

DOE funds are being used.

### Beyond Scope of DOE WAP:

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

### Standards for Remedy:

Standard testing (listed) protocol will be provided.

### Standards for Deferral:

When the scope of work exceeds the budgeted amount.

### Standards for Referral:

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

### Training Provision:

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

### Client Education:

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

### Disposal Procedures:

Field Standards.

## Spray Polyurethane Foam (SPF)

### Concurrence or Alteration:

Concur with WPN11-6



Alternative Guidance



### Funding:

# CSPM 614 Attachment A

DOE Funds will be used.

**Beyond Scope of DOE WAP:**

N/A

**Standards for Remedy:**

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

**Standards for Deferral:**

A Notice of Potential Hazard would be issued.

**Standards for Referral:**

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

**Training Provision:**

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

**Client Education:**

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

**Disposal Procedures:**

Field Standards.

## Ventilation

**Concurrence or Alteration:**

Concur with WPN11-6 <input checked="" type="checkbox"/>	
Alternative Guidance <input type="checkbox"/>	

**Funding:**

DOE funds are being used.

**Beyond Scope of DOE WAP:**

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

**Standards for Remedy:**

If a blower door test cannot be conducted, air sealing measures will be installed based upon a visual inspection. Partial weatherization would be allowed in compliance with guidelines in WPN13-5 and CSPM 606..

**Standards for Deferral:**

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

**Standards for Referral:**

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

**Training Provision:**

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

**Client Education:**

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

# CSPM 614 Attachment A

## Disposal Procedures:

Field standards.

## ASHRAE 62.2 Compliance:

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

## Window and Door Replacement, Window Guards

### Concurrence or Alteration:

Concur with WPN11-6



Alternative Guidance



### Funding:

DOE funds are being used.

### Beyond Scope of DOE WAP:

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

### Standards for Remedy:

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

### Standards for Deferral:

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

### Standards for Referral:

When the scope of work exceeds budget limits.

### Training Provision:

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

### Client Education:

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

## Disposal Procedures:

Field Standards.

## Other (copy and paste as needed)

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

Clothes Dryer Duct venting to dwelling/building exterior.

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

DOE funds are being used.

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

All DOE work shall be deferred.

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

## CSPM 614 Attachment A

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

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

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

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

Referral to other housing programs when necessary.

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

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

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

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

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

Field Standards.



**BUDGET INFORMATION - Non-Construction Programs**

1. Program/Project Identification No. EE0006161		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address State of Michigan 201 S Townsend Lansing, MI 489330000		4. Program/Project Start Date 07/01/2016	5. Completion Date 06/30/2017

**SECTION A - BUDGET SUMMARY**

Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. Federal	81.042	\$ 1,000,000.00		\$ 14,397,981.00		\$ 15,397,981.00
2.						
3.						
4.						
5. TOTAL		\$ 1,000,000.00	\$ 0.00	\$ 14,397,981.00	\$ 0.00	\$ 15,397,981.00

**SECTION B - BUDGET CATEGORIES**

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) GRANTEE ADMINISTR ATION	(2) SUBGRANTE E ADMINISTR	(3) GRANTEE T&TA	(4) SUBGRANT EE T&TA	
a. Personnel	\$ 361,911.00	\$ 0.00	\$ 275,869.00	\$ 0.00	\$ 637,780.00
b. Benefits	\$ 275,182.00	\$ 0.00	\$ 205,175.00	\$ 0.00	\$ 480,357.00
c. Travel	\$ 10,400.00	\$ 0.00	\$ 143,770.00	\$ 0.00	\$ 154,170.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 8,053.00	\$ 0.00	\$ 3,000.00	\$ 0.00	\$ 11,053.00
f. Contract	\$ 0.00	\$ 719,899.00	\$ 1,160,123.00	\$ 390,000.00	\$ 13,997,359.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other	\$ 9,181.00	\$ 0.00	\$ 11,250.00	\$ 0.00	\$ 20,431.00
i. Total Direct Charges	\$ 664,727.00	\$ 719,899.00	\$ 1,799,187.00	\$ 390,000.00	\$ 15,301,150.00
j. Indirect	\$ 55,172.00	\$ 0.00	\$ 41,659.00	\$ 0.00	\$ 96,831.00
k. Totals	\$ 719,899.00	\$ 719,899.00	\$ 1,840,846.00	\$ 390,000.00	\$ 15,397,981.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

**BUDGET INFORMATION - Non-Construction Programs**

1. Program/Project Identification No. EE0006161		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address State of Michigan 201 S Townsend Lansing, MI 489330000	4. Program/Project Start Date 07/01/2016		
	5. Completion Date 06/30/2017		

SECTION A - BUDGET SUMMARY						
Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1.						
2.						
3.						
4.						
5. TOTAL		\$ 1,000,000.00	\$ 0.00	\$ 14,397,981.00	\$ 0.00	\$ 15,397,981.00

SECTION B - BUDGET CATEGORIES						
6. Object Class Categories	Grant Program, Function or Activity				Total (5)	
	(1) PROGRAM OPERATION S	(2) HEALTH AND SAFETY	(3) LIABILITY INSURANCE	(4) FINANCIAL AUDITS		
a. Personnel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 637,780.00	
b. Benefits	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 480,357.00	
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 154,170.00	
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 11,053.00	
f. Contract	\$ 10,162,136.00	\$ 1,487,201.00	\$ 52,000.00	\$ 26,000.00	\$ 13,997,359.00	
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	
h. Other	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 20,431.00	
i. Total Direct Charges	\$ 10,162,136.00	\$ 1,487,201.00	\$ 52,000.00	\$ 26,000.00	\$ 15,301,150.00	
j. Indirect	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 96,831.00	
k. Totals	\$ 10,162,136.00	\$ 1,487,201.00	\$ 52,000.00	\$ 26,000.00	\$ 15,397,981.00	
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	



**BUDGET INFORMATION - Non-Construction Programs**

1. Program/Project Identification No. EE0006161		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address State of Michigan 201 S Townsend Lansing, MI 489330000	4. Program/Project Start Date 07/01/2016		
	5. Completion Date 06/30/2017		

**SECTION A - BUDGET SUMMARY**

Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1.						
2.						
3.						
4.						
5. TOTAL		\$ 1,000,000.00	\$ 0.00	\$ 14,397,981.00	\$ 0.00	\$ 15,397,981.00

**SECTION B - BUDGET CATEGORIES**

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) VEHICLES AND EQUIPMENT	(2)	(3)	(4)	
a. Personnel	\$ 0.00				\$ 637,780.00
b. Benefits	\$ 0.00				\$ 480,357.00
c. Travel	\$ 0.00				\$ 154,170.00
d. Equipment	\$ 0.00				\$ 0.00
e. Supplies	\$ 0.00				\$ 11,053.00
f. Contract	\$ 0.00				\$ 13,997,359.00
g. Construction	\$ 0.00				\$ 0.00
h. Other	\$ 0.00				\$ 20,431.00
i. Total Direct Charges	\$ 0.00				\$ 15,301,150.00
j. Indirect	\$ 0.00				\$ 96,831.00
k. Totals	\$ 0.00				\$ 15,397,981.00
7. Program Income	\$ 0.00				\$ 0.00