

**Department of  
Energy –  
Weatherization  
Assistance Program  
(DOE Formula) PY24  
State Plan**

State Plan including:  
SF-424  
Annual File  
Budget Information  
Master File  
H&S Plan  
T&TA Plan

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number:** EE0009909, **State:** MI, **Program Year:** 2024  
**Recipient:** State of Michigan

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

The Michigan Department of Health and Human Services, Bureau of Community Action and Economic Opportunity (MDHHSBCAEO) uses a combined U.S. Department of Energy (DOE) and U.S. Health and Human Services Low Income Home Energy Assistance Program (LIHEAP) Weatherization Assistance Program (WAP) application. The combined WAP application eligibility expires 12 months from eligibility determination date if work on dwelling unit (energy audit) has not been initiated.

**Low-income household definition:** A low-income household is a family unit meeting the qualifications below to be eligible for weatherization services.

**Income definition description:** A dwelling unit is eligible for weatherization under DOE funding if it is occupied by a low-income household:

1. **Traditional Eligibility:** Whose income is at or below 200% of the most recent Federal Poverty Income Guidelines and is eligible under LIHEAP funding for assistance when income is at or below 200% of Federal Poverty Income Guidelines as allowed by 10 CFR 440.22.
2. **Categorical Eligibility:** Which 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. 88452, 42 U.S.C. § 2701 et seq. or applicable State or local law.
3. **Categorical Eligibility:** Who is determined eligible for assistance under the Low-Income Home Energy Assistance Act of 1981, provided that such basis is at least 200 percent of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget.
4. **Categorical Eligibility:** Whose residents have met the income requirements of HUD means-tested programs through mechanisms including, but not limited to, applicant documentation, interagency lists of recipients, shared system databases, etc. Method of verification of eligibility must be included in the client file.

A household meeting the criteria of traditional or categorical eligibility will be determined by and documented in the statewide database software system by subgrantees. A weatherization tool in the database system, developed by Michigan, will determine income eligibility using a combination application to administer and manage the Weatherization Assistance Program. The database system tracks and reports eligibility for programs administered by MDHHS-BCAEO including DOE and LIHEAP Weatherization programs. Eligibility determinations will be subject to review by MDHHS-BCAEO. Categorical eligibility for weatherization may occur when an individual is found eligible under another federal program (example: eligible LIHEAP recipients are eligible for DOE WAP) using a similar eligibility determination criterion. Documentation of categorical eligibility is maintained in the client file.

On a case-by-case basis, multifamily projects may use alternative methods to document eligibility (traditional or categorical) which will be reviewed and approved by MDHHS-BCAEO. Subgrantees will work with MDHHS-BCAEO Technical staff during the multifamily project approval process and documentation of MDHHS-BCAEO instruction will be maintained in the project file. As multifamily projects are typically managed at the project level rather than individual applicant level, BCAEO and Subgrantees will determine the optimal way to determine and track eligibility.

See section "Describe How Rental Units/Multifamily Buildings Will Be Addressed (V.1.2 Box 4)" for details on Multifamily.

**Policy Link:** <https://www.michigan.gov/mdhhs/doing-business/weatherization/manuals>

Link under CSPM 600 Series – Weatherization Assistance Program. Final PY23 Policy Manual and Draft PY24 Policy Manual

**Policy Manual:**  
Community Service Policy Manual 601 Income Eligibility Guidelines

Describe what household eligibility basis will be used in the Program

Michigan uses the most recent federal poverty guidelines as updated by MDHHS and supported in WPN 24-3.

MDHHS-BCAEO is transitioning from the statewide database FACSPRO to another statewide database system, CSST empowOR, during PY23/PY24. MDHHS-BCAEO is currently working to determine the details in functionality of the new statewide database. During this transition, MDHHS-BCAEO will work with

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

Subgrantees on documentation and program compliance requirements.

Household eligibility documentation is available through the database system, BCAEO website, and Subgrantees. All weatherization requirements and changes are updated in the database system to ensure weatherization assistance program compliance by all Subgrantees. The Eligibility Determination date is used to determine when a client becomes eligible for weatherization. This safeguard ensures that all households receiving weatherization services are eligible. No dwelling unit may be weatherized without documentation that the dwelling unit is an eligible unit. A standard weatherization application or intake/customer report is used by Subgrantees. This application requires that all household income be calculated, per DOE requirements. It also requires that income and home ownership is verified by Subgrantee staff. Income eligibility is determined by Subgrantees using the statewide database system.

Subgrantees are required to maintain a signed weatherization program application or client report. All other documentation of client eligibility is uploaded to the statewide database or maintained by the Subgrantee. If weatherization services do not begin (an energy audit has not been initiated) within 12 months of the eligibility date, the household's eligibility must be redetermined. Both LIHEAP and DOE funding are available for households that are determined income eligible by the parameters listed in the "definition of income used to determine eligibility" of this state plan.

Michigan treats renters and owner-occupied dwellings equally. The Michigan Community Services Policy Manual (CSPM) requires Subgrantees to have procedures in place to ensure eligible households are served according to their priority, whether or not the eligible household rents or owns the dwelling. The Subgrantees' procedures are reviewed by BCAEO's monitors. Michigan's tenant eviction policy is specified in the Landlord Agreement. Within that document, the landlord agrees not to evict the tenant(s) during the period of agreement, except for documented cause, and also agrees not to raise the rent as a result of increased value due to weatherization work completed.

Subgrantees work on a case by case basis with rental property owners (both single family and multifamily) to ensure and document that any WAP payment for a rental building or dwelling will be directed to eligible low-income occupants receiving weatherization services. Any forms for written permission from the owner/landlord prior to the start of any weatherization activities and other requirements, including the dwelling energy audit, must be included in the work file. Renters have the right to appeal any rent increases they believe do not meet the requirements stated above. Any appeal must be stated in writing and must follow an appeal process as outlined in the CSPM.

**Policy Link:** <https://www.michigan.gov/mdhhs/doing-business/weatherization/manuals>

Link under CSPM 600 Series – Weatherization Assistance Program. Final PY23 Policy Manual and Draft PY24 Policy Manual

**Policy Manual:**

Community Service Policy Manual 606 Program Requirements  
Community Service Policy Manual 610.1 Landlord Agreement Sample  
Community Service Policy Manual 610.2 Landlord Contributions  
Community Service Policy Manual 611 Client Priority Selection Criteria

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

Procedures to determine units to weatherize:

**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 quarter.

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

Subgrantees are required to retain records that allow them to determine which dwellings have been previously weatherized, including the date weatherization activities were completed. Dwelling units weatherized (including dwelling units partially weatherized) may not receive further financial assistance for weatherization under this part until the date that is 15 years after the date such previous weatherization was completed. The statewide database system provides documentation of units that have been weatherized.

Subgrantees are required to complete, prior to any weatherization activity, a State Historic Preservation (SHPO) review for units 50 years of age or older at the time the work takes place, units that are historic properties, or units that are in a designated historic area. Michigan's SHPO Programmatic Agreement (PA) was extended until December 2025. Proposed work on tribal land for eligible jobs 45 years or older will be submitted to DOE for consultation with SHPO or Tribal Historic Preservation Office (THPO) as outlined in WAP Memo 110.

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

MDHHS-BCAEO will adhere to the stipulations of the PA, which can be found at: <https://www.energy.gov/eere/wipo/historic-preservation-executed-programmatic-agreements>

MDHHS-BCAEO's review of Subgrantee household files includes verification of SHPO or THPO review and preweatherization status.

**Eligible Dwelling Units**

Structures eligible for weatherization include single family, manufactured housing (mobile homes), and multifamily housing (two to four units and 5+ units). All structures must be stationary and have a specific mailing (street) address. Campers and nonstationary 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 which contains a member who has been determined eligible for any of the categorical eligibilities outlined in section V.1.1.
2. Occupying a qualified rental dwelling unit in accordance with CSPM Item 608.
3. Occupying a shelter, group home or transitional facility in accordance with CSPM Item 608.1.

The only instance where a dwelling unit may be eligible and not be determined income eligible as above is the case of a unit in a multifamily 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 **three unit buildings and five+ unit buildings**. Additional detail on Multifamily/Rental building eligibility is included in later sections.

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.

**Eligibility Documentation (owner and renters):**

The following documents must be uploaded to the statewide database system or retained as directed by MDHHS-BCAEO:

- Signed Customer Report or Standard Application Form, DHS4283, including the Social Security numbers of all household members\*
- Signed 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)
- Utility usage documentation
- MDHHS-BCAEO approval of self-declaration of zero income for the entire household (if applicable)

\*In cases where SSN cannot be collected from all household members, Subgrantees must submit to MDHHS-BCAEO for review.

Multifamily Documentation: Subgrantees completing 5+ unit multifamily projects will work with BCAEO for each project to determine the location and submission of eligibility documentation for projects depending on database system functionality considerations.

**Policy Link:** <https://www.michigan.gov/mdhhs/doing-business/weatherization/manuals>

Link under CSPM 600 Series – Weatherization Assistance Program. Final PY23 Policy Manual and Draft PY24 Policy Manual

**Policy Manual:**

Community Service Policy Manual 605 Reweathering of Dwelling  
Community Service Policy Manual 606 Program Requirements  
Community Service Policy Manual 608 Multifamily Building Eligibility  
Community Service Policy Manual 608.1 Shelters, Group Homes and Transitional Facilities  
Community Service Policy Manual 612 Applicant File Documentation  
Community Service Policy Manual 619 State Historical Preservation Office (SHPO) Review

**Describe Reweathering compliance**

The Consolidated Appropriations Act of 2021 was amended to read as follows: "(2) Dwelling units weatherized (including dwelling units partially weatherized) under this part, or under other Federal programs (in this paragraph referred to as 'previous weatherization'), may not receive further financial assistance for weatherization under this part until the date that is 15 years after the date such previous weatherization was completed. This paragraph does not preclude dwelling units that have received previous weatherization from receiving assistance and services (including the provision of information and education to assist with energy management and evaluation of the effectiveness of installed weatherization materials) other than weatherization under this part or under other federal programs, or from receiving non-federal assistance for weatherization."

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

Subgrantees are required to retain records of all weatherized dwellings, including the date weatherization activities were completed and a description of DOE and other funds used for weatherization in a particular dwelling. No dwellings weatherized within the 15 year "rolling" completion date using DOE funds will receive additional weatherization using DOE funds. Dwellings weatherized after the 15 year "rolling" completion date may be reweatherized if the household in the dwelling is currently eligible and a current energy audit documents that additional cost-effective work can be performed. Exception to the reweatherization policy is allowed under Michigan's Disaster Plan as described in section V.9.

Subgrantees imported data in 2011 on previously weatherized homes into the FACSPro system as far back as 1995. During PY24, there will be a transition from FACSPro to a new database system. The transition to the new database system includes a plan to obtain historical records of previously weatherized dwelling units by address from FACSPro and import or maintained these records by MDHHS-BCAEO. The address is checked by Subgrantees prior to scheduling a household for service to see whether that house has been previously weatherized. If the house has been previously weatherized beyond the 15 year "rolling" completion date with DOE funds, then it is eligible for reweatherization. This policy is clarified in CSPM 605. If the house is eligible for reweatherization, the Subgrantee decides whether to reweatherize 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. The priority is to serve dwelling units that have not been weatherized. Each dwelling to be weatherized is required to receive a new energy audit that considers any previous energy conservation improvements to the dwelling.

**Policy Link:** <https://www.michigan.gov/mdhhs/doing-business/weatherization/manuals>

Link under CSPM 600 Series – Weatherization Assistance Program. Final PY23 Policy Manual and Draft PY24 Policy Manual

**Policy Manual:**

Community Service Policy Manual 605 Reweatherization of Dwelling Units

**Describe what structures are eligible for weatherization**

Structures eligible for weatherization include single family, manufactured housing (mobile homes), 2-4 unit housing, and both small (5+ units, 3 stories or less, no central mechanical systems) and large multifamily housing (25+ units/building of 4 stories or more, or 5+ units/building with central mechanical systems). Michigan has approved audits for single family (2021) and manufactured homes (2021). Additionally, Michigan has approval for the Region 3 DOE-Sponsored Priority List (2023).

For energy audit purposes, per 10 CFR 440.22, multifamily housing is defined as any building which contains five or more single family dwelling units, with the following exception: Row houses and townhomes may be treated as single family dwellings if they have independent mechanical systems and are attached only by vertical walls that contain a continuous pressure boundary (i.e. fire rated assembly) that is not penetrated from the foundation to the highest point of conditioned space. Multifamily units have historically been lower than 20% of Michigan's annual production. For multifamily projects that require an energy audit to be run, in accordance with WPN 23-6, Michigan will submit any multifamily project details to our DOE Project Officer for review prior to any multifamily project commencing. Multifamily projects requiring use of an energy audit tool will be below 20% of Michigan's production until Michigan receives approval for use of a Multifamily Energy Audit tool.

Michigan was approved to utilize the Low Rise Multifamily (LRMF) PL in accordance with WPN 22-8 on the appropriate MF buildings and work scopes. In cases of agencies utilizing that method to develop a work order, Michigan reviews the work order and works with the agency on all steps of the process.

All structures must be occupied prior to weatherization, stationary, and have a specific mailing (street) address. Campers and nonstationary trailers are not eligible. Nontraditional dwelling types such as shelters and mixed-use buildings, while allowed, must be approved by MDHHS-BCAEO prior to weatherization to ensure that the dwelling meets program regulations. If deemed necessary, MDHHS BCAEO will seek approval from the DOE Project Officer for the weatherization of a nontraditional dwelling.

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

1. 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 been determined eligible for any of the categorical eligibilities outlined in section V.1.1.
2. Occupying a qualified rental dwelling unit in accordance with Community Services Policy Manual (CSPM) Item 608.
3. Occupying a shelter in accordance with CSPM Item 608.1.

Vacant unit(s) in a multifamily building which meets the eligibility criteria for the building may be weatherized in accordance WPN 22-12.

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

MDHHS-BCAEO and the Michigan Economic Development Commission (MEDC), have in place a programmatic agreement to ensure National Historic Act compliance with DOE funded activities, originally signed April 2010. Per 36 CFR 800.14 the agreement was extended for 5 years in 2020. The current agreement expires at the end of 2025. MDHHS has begun discussions with MEDC on the next steps for the PA to be renewed before this deadline.

Michigan's SHPO Programmatic Agreement is here: <https://www.energy.gov/eere/wipo/historic-preservation-executed-programmatic-agreements>

Weatherization work will align with the provisions in the Programmatic Agreement and any consultation with the SHPO office. Proposed work on tribal land for eligible jobs 45 years or older will be submitted to DOE for consultation with SHPO or Tribal Historic Preservation Office (THPO).

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

### Multifamily Buildings

Michigan will conduct multifamily projects once projects are identified; the agency will work with BCAEO and DOE per the instructions in WPN 236 to complete a multifamily project. The availability of potential projects, qualified field staff, smoothness and timing of project oversight between entities will each contribute to determining how many multifamily projects will be completed within the Program Year. BCAEO and Michigan agencies will follow the instructions in WPN 23-6 for states with no approved multifamily energy audit tool, and multifamily production for projects requiring the use of a traditional multifamily energy audit tool will remain under 20% of total completed units.

During PY23 Michigan added a statewide multifamily provider. It is anticipated that this Subgrantee will complete the majority of multifamily projects in Michigan. All Subgrantees may opt to do multifamily projects in their territory, but most have not pursued this option. The LRMF PL approach will be the most straightforward way for entities who do not regularly weatherize these types of projects and Michigan anticipates that most Subgrantees will only utilize this option, if any, for multifamily projects. The statewide provider and a few other Subgrantees (based on current experience) will continue to pursue any multifamily projects regardless of audit type. With a statewide multifamily provider subgrantee, Michigan anticipates submitting for and receiving approval of a multifamily energy audit by DOE so that more than 20% of the state's production may be multifamily in upcoming years. As Michigan has received approval for the LRMF PL in PY22, multifamily projects completed with the PL will not be counted towards the 20% production.

When subgrantees weatherize a building containing rental dwelling units, common areas (like vestibules, mechanical rooms, kitchens, and laundries, for the use of tenants only) that are within the building thermal envelope of the qualified residential building may be weatherized as part of the whole building as a system approach to weatherization. Common areas in buildings having a separate envelope not thermally connected to the qualified building, even if existing only for the use of the tenants of the qualified building, may not receive services paid with WAP funding. (WPN 22-12 FAQ)

The Subgrantee may weatherize rental dwelling units in a multifamily building when the property owner has signed a landlord agreement, which: authorizes the weatherization work; accepts conditions protecting the interests of low-income tenants; and, for those units where the tenant does not pay for energy directly, agrees to specifically demonstrate that the benefits of the weatherization accrue primarily to the tenant.

### Multifamily Building Eligibility

Multifamily buildings will be eligible for weatherization when not less than 66 percent (50 percent for duplexes and four unit, and certain eligible types of multifamily buildings\*) of dwelling units in the building (10 CFR 440, Part 22(b)(2)):

- i. Are eligible dwelling units, or
- ii. Will become eligible dwelling units within 180 days under a Federal, State, or local government program for rehabilitating the building or making similar improvements to the building; and

\*The initial expectation is Michigan will target buildings with 5 or more units wherein between 66 – 100 percent of the occupants meet the income eligibility requirements. However, the regulations acknowledge there are certain buildings where 50 percent eligibility is a more appropriate threshold. The regulations are explicit in establishing that this lower threshold is appropriate in duplex and four unit buildings. In addition, in the Interim Final Rule to update 10 CFR 440 DOE provided guidance on what types of large multifamily buildings may be subject to the 50 percent threshold. Michigan will follow this guidance on case-by-case basis and exercise caution while approaching these projects. If considered, Michigan will review if the project and investment of DOE funds will result in significant energy-efficiency improvements because of the upgrades to equipment, energy systems, common space, or the building shell. Additionally, Michigan will review Subgrantees leveraging of resources for the project. Subgrantees will work initially with MDHHS-BCAEO Technical Staff on these projects and MDHHS-BCAEO will then consult with DOE PO.

The 66 percent/50 percent rule applies to multifamily buildings. If the building is 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 multifamily 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 three unit and five unit or more buildings.

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

Michigan also allows Subgrantees to access the USDA and HUD lists that were released by DOE in WAP Memo 099 and WPN 225 to confirm building eligibility for Weatherization. Subgrantees may consider those properties indicated as 100% income eligible or income eligible, in general as eligible for WAP. There is another list in WPN 225 that agencies may consider as potentially income eligible but must still be verified.

### Multifamily Restrictions

Generally, if a multifamily building qualifies for WAP, the entire building will be weatherized including vacant units. All units will receive WAP services per the energy audit.

If a multifamily building is not determined eligible, no single unit may be weatherized. Example: In a ten unit building where there are four eligible units and six

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

ineligible units, weatherization cannot be performed in any of the ten units.

However, as stated in WPN 22-12 FAQ, while DOE believes weatherizing individual unit(s) in a building is marginally effective relative to weatherizing the whole building and creates additional challenges in tracking, reweatherization, etc. DOE recognizes that there are instances where weatherizing individual units may be taken into consideration and does not prohibit weatherizing individual dwelling unit(s) in a qualified multifamily building. As such, Michigan will work with Subgrantees to determine if the identified project meets the criteria and consult with the DOE PO as needed.

In these instances, the following conditions must be met:

- i) The unit is self-contained, without sharing an attic or basement with adjacent units, and has its own individual heating and cooling systems,
- ii) The unit has been audited with a current, approved energy audit tool and protocol that is able to adequately address a single unit within a larger structure, and
- iii) The scope of work is specific to allowable measures within the eligible unit(s).

When weatherizing individual units in a multifamily building, the health and safety conditions of the whole building or adjacent units shall be considered to ensure neighboring units do not negatively impact the health and safety of the weatherized unit(s) and the weatherized unit(s) will not negatively impact the health and safety of neighboring units. If such negative effects will occur, then some health and safety or incidental work to neighboring units (with their permission) can be funded by WAP. If such necessary work cannot be addressed, the unit would need to be deferred.

#### **Shelters**

Per CFR 440.22 the State may weatherize Shelters. 10 CFR 440 defines Shelters as "...a dwelling unit or units whose principal purpose is to house, on a temporary basis, individuals who may or may not be related to one another and who are not living in nursing homes, prisons, or similar institutional care facilities." Shelters for the homeless, battered spouses, etc., may be weatherized. Subgrantees may count each 800 square feet as a unit or each floor of the shelter as a unit. Prior approval by MDHHS-BCAEO is required to weatherize a shelter.

#### **Rehabbed Multifamily Buildings**

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

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

#### **Mixed residential/commercial buildings**

As outlined in WPN 22-12, qualifying residential buildings containing storefronts or other commercial business spaces may be weatherized using WAP funding. WAP funding can only be used for the residential portion of the building. If a whole-building audit on a building with a centralized or otherwise residence/commercial shared HVAC unit recommends alterations or replacement of the HVAC system, then the commercial owner(s) would have to pay their share of that energy conservation measure (ECM) proportional to the percentage of energy used by the commercial establishment(s). Michigan will work directly with Subgrantees considering weatherization for a mixed residential/commercial building to confirm eligibility and weatherization will meet program and funding requirements. Prior approval from MDHHS-BCAEO is required for these projects.

**Ineligible buildings:** Commercial, non-qualifying institutions, and non-qualifying buildings.

**Policy Link:** <https://www.michigan.gov/mdhhs/doing-business/weatherization/manuals>

Link under CSPM 600 Series – Weatherization Assistance Program. Final PY23 Policy Manual and Draft PY24 Policy Manual

#### **Policy Manual:**

Community Service Policy Manual 606 Program Requirements  
Community Service Policy Manual 608 Rental Unit and Multifamily Weatherization  
Community Service Policy Manual 608.1 Shelters, Group Homes and Transitional Living Facilities  
Community Service Policy Manual 619 State Historical Preservation Office (SHPO) Review

Describe how Rental Units/Multifamily Buildings will be addressed

In the WAP a multifamily building is any residential building containing two or more units.

Residential buildings containing 5 or more dwelling units that are 4 or more stories above grade, or that contain 5 or more units with centralized/shared mechanical systems (e.g., heating, cooling, hot water, ventilation) are referred to as large multifamily buildings.

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

Residential buildings containing 5 or more dwelling units per building, no more than 3 stories above grade, with each individual unit containing its own mechanical systems (no centralized mechanical systems) are referred to as small multifamily or low-rise multifamily buildings.

Multiunit buildings with fewer than 5 units are called 2-4 unit buildings

Michigan follows all DOE Weatherization Program Notices (WPNs) regarding percentage requirements for multifamily buildings with five or more units. See Prior Section "What Structures are Eligible for Weatherization (V.1.2 Box 3)" for details on determining eligibility of multifamily structure.

Single family rental dwellings and multifamily buildings up to four units are addressed using the NEAT software. For single family units, subgrantees are required to provide proof of ownership in each client file prior to commencing work. This includes manufactured homes. Single family units for sale are not eligible for weatherization unless the home will be sold to the low-income resident of the dwelling. Homes in foreclosure may be deferred by the subgrantee.

Rental units are eligible for weatherization and represent a portion of the dwelling units weatherized. Landlord contributions for eligible single family and manufactured housing rental dwellings shall not be required per 10 CFR 440.22(d) and the Final Rule amending the DOE Weatherization Assistance Program regulations dated March 4, 1993, (58 FR 12514). Subgrantees may encourage landlord financial participation, but eligible single family and manufactured housing dwellings may not be deferred for service if the landlord does not consent to a financial contribution. Landlord contributions for single family dwellings are not required but are optional and may be accepted.

For two years post weatherization (two years after the final inspection date) the owner must agree not to raise the rent as a result of the weatherization performed on the rental unit. In the case of a rent increase, tenants are made aware of their right to appeal the Landlord/Tenant agreement, which must be signed by both parties (owner and tenant) prior to commencing work. Subgrantees are required to enter into an agreement with landlords of multifamily properties.

Except in cases where the landlord also qualifies for weatherization services, Michigan requires financial participation of a landlord for weatherization of a multifamily property unless express case by case waiver for contribution is granted. When weatherizing rental properties containing two to four units, subgrantees may choose to require landlord contributions, except in cases where the landlord also qualifies for weatherization services. Amount of financial participation is determined at the local level. Landlord participation can be used to buy down an SIR of a multifamily weatherization project in compliance with WPN 22-12 and WPN 22-9.

#### **Rental Units**

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

- They possess written permission of the building owner or authorized agent is obtained before commencing work.
- The benefits of the services accrue primarily to the low-income tenants residing in such units.
- For 24 months after Weatherization work completion, the household will not be subjected to rent increases (unless those increases are demonstrably related to matters other than the weatherization work performed).
- There are adequate procedures whereby the Subgrantee can receive tenant complaints and owners can appeal, should rental increases occur.
- No undue or excessive enhancement shall occur to the value of the dwelling unit.

\*A properly executed energy audit resulting in installation of common energy conservation measures (SIRs) with an SIR of 1 or greater with necessary health and safety and incidental repairs would not constitute an undue enhancement

The Subgrantee will ensure a landlord agreement is completed for each building containing a rental dwelling unit to be weatherized prior to the weatherization of any rental unit. A Tenant Synopsis (Landlord/Tenant) must be signed by the tenant receiving weatherization services. Landlord agreements generally include all necessary information to allow the weatherization improvements to proceed in an expeditious and cost-effective manner in accordance with DOE regulations and guidelines as well as State of Michigan and local contract law. In addition to addressing basic guidelines, the landlord agreement typically includes:

1. The approval of signatures of the building owner(s) or legal representatives;
2. A description of the owner's obligations including any financial contributions;
3. A description of the Subgrantee's obligations including the scope of work and;
4. Rental clauses that allow rent increases only for specific causes or set limits on increases such as prorated share of increased property taxes, increased operating expense, or the prorated amortized cost of property improving outside the scope of WAP;
5. Protection against sale of property clause; and
6. A definition of a breach in the agreement and the remedies to be taken if such a breach occurs including liquidated damages.

Any Subgrantee customized document must at a minimum contain the information listed above. MDHHS-BCAEO provides sample landlord agreements, policies, and other required documents for Subgrantees to use as a starting point.

#### **Demographics & Prioritization of Projects**

Subgrantees must have procedures in place to ensure that priority is given to identify and provide weatherization assistance to elderly persons, persons with disabilities, families with children, high residential energy users, and household with high energy burden. Subgrantees must obtain, verify, and maintain, as required, the proper documentation on demographics for the properties to be weatherized. Subgrantees are not required to collect any additional information beyond the demographics required for reporting purposes to the BCAEO or DOE.



**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

To meet the purpose of WAP, Michigan works to ensure that weatherization services are provided to low-income persons that live in all types of housing (i.e., site built single family, manufactured housing units, and multifamily buildings). Multifamily buildings, including rental housing, offer opportunities for energy efficiency upgrades that are a cost-effective approach to lowering operating expenses, maintaining affordability, and creating healthier, more comfortable living environments for low-income families. For this reason, Michigan has made significant efforts in recent years to increase Weatherization in multifamily housing. Some of these efforts include: encouraging existing Subgrantees to complete multifamily work (BCAEO Technical Specialist plans to work directly with agencies to identify multifamily projects in the area), receiving approval to utilize the Low Rise Multifamily Priority List, and adding a Subgrantee as a statewide multifamily provider in May 2023.

Generally, resident demographics must be reported on a unit-by-unit basis. However, in some cases, buildings with HUD or LIHTC approval may collect rent rolls or other such building owner records provided that, on an entire building or project basis, there is sufficient documentation to meet this requirement. This will be determined when the Subgrantee request is made. Subgrantees must initiate a landlord/tenant agreement to capture elements required by the regulations (e.g., benefits accrue to the tenants, tenants are not subjected to rent increases due to property improvements provided by WAP, what occurs if tenants are evicted, or the building sold before a specific period of time has passed). This agreement should correspond to the type of subsidy the building receives. See Weatherization of Rental Units (currently WPN 22-13) FAQs for more information on landlord/tenant agreements.

**Average Cost Per Unit (ACPU) in Multifamily Buildings**

The statewide maximum allowable ACPU is for all units, whether they are site built single family, mobile homes or multifamily. All units in a Weatherized multifamily building, regardless of income qualifications for the individual unit, count toward the Subgrantee's annual production and therefore the ACPU.

**Documentation Requirements**

The following table provides a quick reference to convey the documentation required by DOE whether selecting buildings that appear on a HUD/USDA list or a building that is not on the list(s). These are detailed further below Table 1.

Table 1. DOCUMENTATION REQUIREMENTS

Documentation Required	If on HUD or USDA List	If NOT on HUD or USDA List
Building Owner Permission	Yes	Yes
Income Eligibility Documentation	No (Agency must document that the HUD or USDA lists (see WPN 22-5) was used and the eligibility threshold of the list (e.g., 66% or 100%).	Yes
Demographics of Residents	Yes	Yes
Accrual of Benefits to Tenants <sup>2</sup>	Yes, if applicable	Yes, if applicable
Audit Runs	Yes	Yes
Landlord Participation/Buy-Down Agreements	Yes, if applicable	Yes, if applicable

**Income Eligibility Documentation**

After reviewing eligibility requirements as determined for MSHDA's LIHTC (Low Income Housing Tax Credit) program, BCAEO has determined that income considerations are similar or more restrictive than the DOE income eligibility guidelines. As result, traditional eligibility can be determined for LIHTC projects by reviewing the Household Certified Income, as collected by the LIHTC property landlord or its representative. The determination of a LIHTC household's income must occur within 12 months preceding the WAP eligibility date. This income, for all household members, will be then assessed against 200 percent of federal poverty level income guidelines to determine eligibility for the DOE Weatherization Assistance Program (WAP). Eligibility must be assessed building by building, and documentation of each building review and eligibility levels must be retained in the project file. Documentation for LIHTC properties will follow the table above.

Except when using the HUD/USDA lists or LIHTC projects as referenced above, the Subgrantee must collect income information on a unit by unit basis to ensure at least 66% (or 50% for duplexes and four unit buildings and "certain eligible types of large multifamily" category) of the occupants in a three unit building and five or more unit building are eligible for service.

**Accrual of Benefits to Tenants**

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

- The benefits of weatherization assistance in connection with such rental units, including units where tenants pay for their energy through their rent, will accrue primarily to the low-income tenants residing in such units;
- Instances in which a tenant does not pay for energy directly, Grantees must ensure the weatherization benefits accrue to the low-income tenant.
- Any request for weatherization of eligible multiunit buildings needs to demonstrate in sufficient detail to the Grantee that the benefits of weatherization work accrue primarily to the low-income tenants.

To ensure this, Subgrantees have the option of:

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

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

Generic assertions such as “tenant services will be improved” or “weatherization will improve health and safety” are not sufficient to demonstrate that the accrual of benefits requirement is met. For example, a detailed plan of what improvements are planned, how they would benefit the tenant, and a timeline for completion would be recommended. Any request for weatherization of eligible multi-unit buildings needs to demonstrate in sufficient detail that the benefits of weatherization work accrue primarily to the low-income tenants.

Table 2 is a quick reference to convey which potential tenant benefits are valid for different utility payment arrangements.

**Table 2. ACCRUAL OF BENEFITS**

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

**Audit Runs Including Priority List Projects**

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

- The recommended statement of work including the savings-to-investment ratios (SIRs) of each measure and the total project SIR.
  - If any measures were bought down or otherwise leveraged the documentation must show the pre-leveraged SIRs of each individual measure and the pre-leveraged project SIR.
  - Documentation must include the other sources that funded each bought-down measure.
- An immediately accessible electronic file that shows all the audit inputs and outputs. For priority list projects the file should include all pre-weatherization measurements and all completed priority list pages.
- Final installed costs of each measure and the total project cost. If the project went through the bidding process, then all bid prices – winning and losing bids –

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

must be in the file.

- All specifications defining each measure.

**Building Owner Permission**

As required in 10.CFR 440.22 (b)(1), the Subgrantee is required to obtain the written permission of the owner of the building or its agent prior to proceeding with weatherization. The Subgrantee will ensure a landlord agreement is completed for each building containing a rental dwelling unit to be weatherized, prior to the weatherization of any rental unit. BCAEO has created sample landlord documentation for Subgrantees to use and edit as appropriate. The sample documents include: landlord contribution policy, preliminary landlord agreement, landlord agreement, eligible dwelling units and rent list, work scope, landlord contribution agreement, tenant benefit accrual, and tenant synopsis of landlord agreement.

**Leveraging, Landlord Participation & Buy Downs**

Leveraging (or co-funding, as defined in WPN 22-9) is allowable in Michigan’s WAP for all housing types and creates flexibility for Subgrantees to install measures that save energy but do not achieve the necessary Savings-to-Investment Ratio (SIR) by allowing the agencies to secure funding to apply to the cost of the measure, bringing down the cost of the measure to meet the SIR requirement. Michigan follows the guidance for leveraging (co-funding) outlined in WPN 22-9.

Except in cases where the landlord also qualifies for weatherization services, BCAEO requires financial participation of a landlord for weatherization of a multifamily property unless express case by case waiver for contribution is granted. When weatherizing rental properties containing two to four units, Grantees may choose to require landlord contributions, except in cases where the landlord also qualifies for weatherization services. The Subgrantee must have a written landlord contribution policy. The policy may include a cash contribution, rent reduction to the tenant, consideration of documented improvements made to the property within the last twelve months, or a combination of all three. A Subgrantee cannot require a landlord contribution for DOE single family rental homes but can encourage landlords that are able to contribute to do so as part of the weatherization work being completed.

In multifamily weatherization, building owners may also “buy down” measures typically prioritized as needs – such as furnace or boiler replacements or new fenestration – that do save energy but don’t achieve an SIR of 1 or greater as a standalone measure. Note that when using Low Rise Multifamily Priority Lists, buy downs can also be utilized to allow optional measures. This guidance addresses how Subgrantees can use buy down funding to reduce the cost of individual measures while meeting the program requirements as they relate to the SIR for the WAP investment.

Subgrantees may use this SIR calculation allowance only when the cost effectiveness for the entire investment in the property can still be substantiated. In other words, a measure can be bought down only when the overall SIR of the package of measures, including the full cost of the measure that will be bought down, is 1.0 or greater. As noted above, this should be documented in the project file.

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

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

In the second case, the replacement windows would not be eligible for a buydown in WAP because the pre buydown package SIR is below 1.0.

**Energy Saving Economics Case 1 – Buy-down Allowed in WAP**

Measure	Measure SIR	Cumulative SIR
Infiltration Reduction	1.3	1.3
Lighting Retrofits	7.4	1.7
Ceiling Insulation	2.4	1.9
Replacement Windows (pre-buy-down)	0.8	1.1 (= 1.0)

**Energy Saving Economics Case 2 – Buy-down Not Allowed in WAP**

Measure	Measure SIR	Cumulative SIR
Infiltration Reduction	1.3	1.3
Lighting Retrofits	7.4	1.7
Ceiling Insulation	2.4	1.9
Replacement Windows (pre-buy-down)	0.6	0.9 (not = 1.0)

Michigan does not allow Subgrantees to “leapfrog” measures that are already cost effective to accommodate a measure that is included in the package of measures as a result of using the provisions of this guidance. All measures that were cost effective after the initial energy audit is conducted would remain a part of the list of measures to be completed on the building. Measures that did not attain the SIR of 1.0 can only be considered for buy down if all the cost effective measures in the initial audit are also installed.

**Policy Link:** <https://www.michigan.gov/mdhhs/doing-business/weatherization/manuals>

Link under CSPM 600 Series – Weatherization Assistance Program. Final PY23 Policy Manual and Draft PY24 Policy Manual

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

**Policy Manual:**

Community Service Policy Manual 601 Income Eligibility Guidelines  
Community Service Policy Manual 606 Program Requirements  
Community Service Policy Manual 608 Rental Unit and Multifamily Weatherization  
Community Service Policy Manual 608.1 Shelters, Group Homes and Transitional Living Facilities  
Community Service Policy Manual 610.1 Landlord Agreement Sample  
Community Service Policy Manual 610.2 Landlord Contributions

**Describe the deferral Process**

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

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

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

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

Each subgrantee is required to have a written walkaway (deferral) policy which is in the best interest for its service area. Agencies include in their policies the procedures to be followed when making a deferral decision and how the customer is notified. The Subgrantee policy should include guidelines for establishing a time period for correction and an identification of resources and options to assist the applicant. Grantees must also include a list of potential reasons for deferral, which may not be all encompassing, as deferral reasons may be conditional or compounded by multiple issues. Some conditions to consider are listed below.

**Conditions where Subgrantees must not weatherize include:**

- The dwelling was weatherized with a final close out date within the last 15 years.
- The building or dwelling unit is scheduled for demolition/redevelopment or is for sale\*.
- The condition of the structure would make weatherization impossible or impractical (e.g. inability to meet SWS)
- Per WPN 23-6, client refusal of any cost justified major measure. Agencies should make every attempt possible to educate clients around cost justified measures they are refusing. See CSPM 606.3 for further information on measure skipping.
- Per WPN 23-6, if the building owner or occupant declines a measure not defined as a major measure prior to work beginning, the auditor must include in the client file a comprehensive justification, including background/source documents that support the decision to skip a specific measure. All other weatherization measures must be installed. If the auditor cannot access background/source documents that justifies the building owner/occupant's decision to decline a measure or the measure is defined as a "major measure", the situation must be fully documented in the client file and the job must be deferred due to client refusal. See CSPM 606.3 for further information on measure skipping.
- Encountering a mandatory reason for deferral as outlined in the Health and Safety plan (CSPM 614).

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

- The extent and condition of lead based paint in the house would potentially create further health and safety hazards.
- The building structure or its mechanical systems, including electrical, plumbing, sagging or rotted roof rafters, wall studs and floor joist deficiencies, are in such a state of disrepair that failure is imminent, and the conditions cannot be resolved cost effectively.
- The house has been condemned or electrical, heating, plumbing, or other equipment has been "red tagged" by local or state building officials or utilities and the conditions cannot be resolved with WAP funds.
- Exterior dwelling deterioration.
- Electrical or plumbing hazards or structural failures that cannot be addressed/completed within Incidental Repair or Health and Safety (H&S) cost limitations.

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

- Standing water, excessive water/moisture damage, remnant of standing water issues, mold, radon, friable asbestos, deteriorated lead based paint surfaces, flaking lead paint, volatile organic compounds, or other hazardous materials that cannot be addressed by the weatherization work.
- Moisture problems are so severe they cannot be resolved under existing health and safety measures and with minor repairs.
- Unvented space heater(s) that may have a harmful effect on the air quality of the home.
- Dwellings where construction has not been completed.
- Major remodeling is in progress, which limits the proper completion of weatherization measures.
- Improperly stored chemicals, combustible materials, or other fire hazards that present a danger to the occupants or the workers.
- Evidence of infestations of rodents, insects, and/or other vermin.
- Unsecured pets that may prevent workers from safely completing their work.
- The presence of sewage or animal feces in or around the home.
- The home receives HUD funding and at the time of completion, the unit will not meet applicable HUD Lead Based Paint standards.
- Maintenance or housekeeping practices that limit the access of workers to the dwelling or create an unhealthy work environment.
- Dangerous conditions exist due to high carbon monoxide levels in combustion appliances, and cannot be resolved under existing health and safety measures.
- In the judgment of the energy auditor, any condition exists which may endanger the health and/or safety of the work crew or subcontractor, the work should not proceed until the condition is corrected.
- The client is uncooperative, abusive, or threatening to the crew, subcontractors, auditors, inspectors, or others who must work on or visit the house. Threat(s) of violence or abusive behavior to worker(s) or household member(s) during the weatherization process.
- The client/occupants has known health conditions that prohibit the installation of insulation and other weatherization materials.
- The illegal presence or use of any controlled substance in the home during the weatherization process.
- The building or dwelling unit is in foreclosure.
- Ownership cannot be confirmed due to a legal dispute. Clear title must be established before services can be provided.
- The cost to weatherize a home is so significant that it will negatively impact the Subgrantee's ability to meet the statewide average cost per dwelling (e.g. those homes that are more than 2x the state average). MDHHS-BCAEO must be notified in writing prior to deferring a dwelling for this reason.

When the auditor/inspector or any other weatherization employee encounters an unsafe or inoperable heating appliance during the heating season, weatherization work should not proceed until the condition is corrected. If the measure is allowable in weatherization and determined to be necessary for this job, weatherization funds may be used to correct the condition.

**Walkaway (Deferral) Notification Requirements**

Upon the decision to defer weatherization program services, the customer must be notified in writing within five working days. However, if the Subgrantee will use deferral reduction funding (DOE WRF or other available grants) to address the issue and resolve the deferral, notification does not need to be provided to the client. 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, and any guidelines for establishing a time period for correction. The requirements for rectifying the deferral must be reasonable and appropriate to the severity of the situation being addressed. Examples of reasonable timeframes would be 30 days for housekeeping concerns or 90 days for major remodeling work. In cases where an individual client feels a deferral is unfairly determined, the individual client may appeal a decision to defer. In these circumstances, the Subgrantee must provide the client the agency's defined appeals process to follow. 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.

**Documentation**

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.

**Deferral Tracking Requirements**

All deferrals that occur after a Weatherization application is created and the reason for the deferral must be documented in the database system. If a deferral is identified before the Weatherization application is created, and the Grantee does not have the resources to address it, they must track it in the BCAEO Deferral Tracking Tool. At any time, BCAEO may request submission of the up-to-date Tracking Tool.

**Weatherization Readiness Funds**

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

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

Units receiving WRF must:

- Be closed during the same DOE grant project period. This is typically a 3-5 year grant period. BCAEO will notify Subgrantees in years that end the grant and that WRF projects will need to be closed that same year.
  - DOE Formula units receiving WRF funds must be closed at the end of the DOE Formula project period, which is anticipated to be PY24.
  - DOE BIL units receiving WRF funds must have all WRF funds expended by the end of PY24. The weatherization job must be closed within six months of completing the deferral reduction work. BIL jobs receiving PY24 DOE WRF funds must be closed within six months of the end of PY24 which is Dec 31, 2025.
- Count as either a DOE Formula unit or a DOE BIL unit.
- Result in a DOE completion defined as, “A dwelling on which a DOE-approved energy audit or priority list has been applied, and at least (1) DOE funded allowable energy conservation measure is installed and weatherization work has been completed.”
- Each dwelling unit can receive \$15,000 DOE WR Funds. A waiver may be submitted by the Subgrantee if the funds required to address the cause of deferral exceeds \$15,000.

All items that could be allowable under WRF must first be considered as an Energy Conservation Measure or Incidental Repair. If they will not be cost effective to install, they may then be considered under Health & Safety. If use of Health & Safety funds is unaffordable on that measure, then the use of WRF funds is allowable. Subgrantees will maintain documentation supporting that the use of Weatherization Readiness Funds addressed issues that would have resulted in the home being deferred. Supporting documentation may include statement for why the home was at risk of deferral necessitating the use of WRF funds.

WRF funds will be initially allocated to Subgrantees aligned with the DOE formula allocation. MDHHS-BCAEO will evaluate spending trends, frequency of deferrals across the state, and solicit spending projections for Subgrantees in order to reallocate WRF funds as needed.

**Timeframe Adjustments:**

Some timeline rules are formulated between the eligibility determination and energy audit conducted during a WAP job. The following policies will supersede those timeframes when deferral reduction (WRF) work is taking place.

Substitute for timeframe from CSPM 601: “Re-certification, the redetermination of a household's income eligibility, must occur at least every 12 months from the eligibility date, if the **deferral reduction work** has not yet been initiated.”

Substitute for timeframe from CSPM 606: “Grantees must complete the weatherization of a home within 6 months of completing the **deferral reduction work**. Jobs that are not completed within 6 months of **completion of deferral reduction work** require an additional, up to date, energy audit to be performed.”

BIL jobs receiving PY24 DOE WRF funds must be closed within six months of the end of PY24 which is Dec 31, 2025.

**WRF Allowable Measures and Reporting**

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

Avoided deferrals – the number of dwelling units made weatherization ready with these funds, and for each building or unit:

- Year Built;
- Housing Type (site-built single family, manufactured housing, multifamily);
- Nature of repairs needed which prohibit weatherization. Where applicable, identify multiple repairs or remediation reasons for a single building. The following repairs are allowable:
  - Mold remediation
  - Moisture control
  - Knob and tube wiring issues
  - Other electrical issues
  - Grading
  - Roof repair and replacement
  - Structural issues
  - Measures to meet SHPO requirements
  - Gutters and downspouts
  - Drainage system
  - Sump pump installation

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number:** EE0009909, **State:** MI, **Program Year:** 2024  
**Recipient:** State of Michigan

- Minor plumbing repair and replacement
  - Pest control
  - Asbestos encapsulation and remediation
  - Duct repair and replacement
  - Health & Safety measures that are unaffordable with the Subgrantee’s normal Health & Safety funds. Subgrantee must document that the H&S Measures are unaffordable.
  - Other – Grantees may encounter reasons for deferral not included on the prior list. In these instances, the agency must submit a waiver to BCAEO describing the needed measure and other relevant details. Waivers must be submitted to MDHHS-BCAEO@michigan.gov, and the agency must receive pre-approval before work commences.
- DOE WRF expenditure per unit and building; and,
  - Leveraged fund expenditure per unit and building (i.e., funds such as LIHEAP, HUD, non-federal, etc. braided with DOE WRF to make building weatherization ready).

Monitoring of WRF expenditures is outlined under Final Inspections and Monitoring Activities.

**Policy Link:** <https://www.michigan.gov/mdhhs/doing-business/weatherization/manuals>

Link under CSPM 600 Series – Weatherization Assistance Program. Final PY23 Policy Manual and Draft PY24 Policy Manual

Community Service Policy Manual 609 - Deferral Policy

Community Service Policy Manual 606.3 - Technical Weatherization Installation Requirements

**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 a Native American tribe will receive benefits equivalent to the assistance provided to the other low-income persons within the state. All eligible households, including those with Native American tribal members, are served equally without regard to race, color, national origin, gender, or religion.

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

Michigan serves all 83 counties in the state in order to provide equal access to WAP services for all eligible households. Services are based largely on Community Action Agencies (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.

In 2016, MDHHS-BCAEO conducted statewide procurement for WAP subgrantees 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/bsol/> and complied with federal and state procurement policy. The next bid is tentatively scheduled for 2026. MDHHS-BCAEO reserves the right to schedule a bid sooner to expand statewide weatherization operational capacity, to provide a statewide weatherization solution for contractor shortages, and/or to meet demands of multifamily weatherization jobs.

MDHHS-BCAEO reserves the right to reallocate 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 maintaining production level goals and meeting work quality standards (SWS and Michigan Field Guide). Additionally, in an event that an area is unserved, the MDHHS-BCAEO reserves the right to designate a provider for the service area until another Invitation to Bid is posted.

MDHHS-BCAEO completes an annual Risk Assessment. The utilized risk assessment tool at the time of this state plan submission is called

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number:** EE0009909, **State:** MI, **Program Year:** 2024  
**Recipient:** State of Michigan

the STAR Assessment. The STAR Assessment tool evaluates subgrantees based on administrative, technical, and fiscal management and is used to evaluate performance and to determine if a subgrantee is administering an effective weatherization program. A rating of "high risk" in the weatherization portion of the assessment (scores 1 STAR or 2 STARS) for two consecutive years on the annual STAR Assessment performed by MDHHS-BCAEO, may result in contract termination and a competitive proposal process for the subgrantee's territory after the current contract expires. Should the STAR Assessment rating result in a competitive proposal process for any subgrantee's territory, MDHHS-BCAEO will proceed in accordance with 10 CFR 440.15. MDHHS-BCAEO may, at any time, determine utilization of another risk assessment tool for BCAEO programs. If that does occur, this new tool would be utilized by the Michigan WAP with the purpose of assess risk of compliance issues with subgrantees administering the WAP.

### V.3 Priorities

As required by federal regulation, Michigan prioritizes households with elderly or disabled family members, and families with children. Michigan Subgrantees also use high residential energy use and/or high energy burden in prioritizing households for WAP service. WAP staff uses the Michigan Energy Appraisal Winter Outlook Report prepared by the Michigan Public Service Commission and to determine thresholds for high energy use/on an annual basis.

Michigan utilizes a priority point system when delivering services to low-income single-family homes to meet 10CFR 440. Mandatory priority categories are as follows:

- Households with elderly
- Households with disabled
- Households with children
- High Residential Energy User
- High Residential Energy Burden

In 2022, MDHHS-BCAEO did an analysis of its definition of households with a High Energy Burden (HEB). Staff reviewed statistics of average energy burden for the 200% FPL income level, and estimates to define the top 1/3 of potential clients as HEB households. MDHHS-BCAEO determined that changing the definition of HEB from 20% of total income toward energy costs to 15% better aligns with current statistics for the state of Michigan. Due to the particular vulnerability of households with a HEB, MDHHS-BCAEO requires that Subgrantees assign 2 priority points for households meeting this definition.

Subgrantees are required to utilize a priority point system when determining homes to weatherize and are required to have a written policy of their prioritization system. Subgrantees determine how to best serve the eligible population in their service territory. Subgrantees must utilize the statewide point system to determine priority points. The priority point system does not differentiate between eligible households that rent or own their dwellings and Subgrantees may not discriminate due to housing type. Each category is 1 point with the exception of HEB, which is 2 points. Clients meeting one or more points will be considered Priority Applicants. Subgrantees may choose to use oldest eligibility date for positioning applicants with the same number of priority points. Applicants with no priority points will remain at the end of the waiting list and will be served, oldest eligibility date first, after all "Priority Applicants" with one (1) or more points are served. All applications are required to reverify the household income for the program annually. No applications on the waiting list should be older than one year.

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

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

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

Emergencies will take precedence over all other priorities. Emergencies are defined as life-threatening housing conditions. MDHHS-BCAEO will evaluate all emergency waiver requests from subgrantees, results of the review must be kept in the client's file.

**Policy Link:** <https://www.michigan.gov/mdhhs/doing-business/weatherization/manuals>

Link under CSPM 600 Series – Weatherization Assistance Program. Final PY23 Policy Manual and Draft PY24 Policy Manual

**Policy Manual:**  
Community Service Policy Manual 611 Client Priority Selection Criteria



**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number:** EE0009909, **State:** MI, **Program Year:** 2024  
**Recipient:** State of Michigan

#### V.4 Climatic Conditions

Michigan has large seasonal temperature changes and a significant north south temperature variance. There are 10 climate divisions established by the National Oceanic and Atmospheric Administration. The number of Heating degree Days (for a 10year time span using the most recent available data) for each climate division in Michigan is used to determine 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.

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: <https://mrcc.purdue.edu/CLIMATE/>) See attachment in SF424 for a breakout of data by climate division in Michigan.

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

##### V.5.1 Technical Guides and Materials

All weatherization work in Michigan is performed in accordance with DOE approved procedures, including the appropriate DOE approved energy audit (single family, multifamily (5+ units), or mobile home) 10 CFR 440 Appendix A, the Michigan Weatherization Field Guide, Energy Auditor Manual, and the Standard Work Specifications (SWS).

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 22-4 Section 2. The signature on the contract serves as proof of receipt. The signature also serves as agreement to comply with all Michigan and DOE WAP policies and procedures, including, but not limited to WPNs, WAP Memos, Quality Work Plan, Community Services Policy Manual (CSPM), SWS, Michigan Weatherization Field Guide, Energy Auditor Manual, and other technical guides and manuals as required by CSPM.

Also, beginning in PY15 and as required by WPN 22-4, Subgrantees must include similar language in their contracts with contractors who perform work for WAP. Administrative monitors review contracts for compliance. Field monitors, through monitoring inspections, confirm conformance with the Michigan Weatherization Field Guide and the SWS.

The Michigan SWS aligned Field Guide is available as a web interactive version or a downloadable PDF. Subgrantees can access the field guide on mobile devices in the field and from a hard copy, along with all other policy. The base field guide was purchased from Saturn. MDHHS-BCAEO assembled a group of volunteers from the weatherization network to review and update the base guide. The Michigan Field Guide was approved by DOE in May of 2021. The downloadable PDF version can be found at [Michigan Field Guide PDF](#). The web interactive version can be found at [Michigan Field Guide Web Version](#).

The following program updates, procedures manuals, and standards documents are available on BCAEO website (<http://www.michigan.gov/bcaeo>) and in MDHHS-BCAEO's external SharePoint, the MiTEC website and via email and in the database system:

- NREL Standard Work Specifications link: <http://sws.nrel.gov>
- US 10CFR600
- US 2CFR200
- US 10 CFR 440
- U.S. Department of Energy Weatherization Program Notices
- U.S. Department of Energy Weatherization Memorandums
- Community Services Policy Manual <https://www.michigan.gov/mdhhs/doing-business/weatherization/manuals>
- State of Michigan Department of Licensing and Regulatory Affairs (LARA) Policy 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.

When updates are made, the network is notified, and all policy is updated online and in the database. MDHHSBCAEO also provides updates in the MDHHS-BCAEO Update newsletter that is sent to the network.

The Subgrantee shall assure that appropriately credentialed or trained staff under its control, including Subgrantee employees and/or subcontractors, shall

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number:** EE0009909, **State:** MI, **Program Year:** 2024  
**Recipient:** State of Michigan

perform functions under this Agreement. The Subgrantee 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 Subgrantee 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 subgrantee contracts. Contractors hired by the Subgrantee must have agreements that include the same technical requirements as listed above. The work on the contract must be consistent with the Subgrantee 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).

### **Weatherization Work**

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

Subgrantee will ensure that all weatherization activities not included in the list of "Allowable Activities" in the NEPA determination are excluded or submit an [Environmental Questionnaire \(EQ\)-1](#) for review per NEPA requirements in 10 CFR Part 1021

The weatherization measures most commonly installed in eligible units are air sealing; 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 LED bulbs.

Domestic water heaters (DWH) are an electric base load measure being replaced as an Energy Conservation Measure or a Health & Safety measure on eligible dwelling units.

### **LED bulbs**

Michigan has been approved by the DOE project officer to use LED bulbs beginning in PY17.

### **General Heat Waste Reduction Measures**

Subgrantees may install the identified General Heat Waste reduction measures, known as Optional Weatherization Measures, on one to four unit dwellings. Optional Weatherization Measures are intended to be relatively low-cost items that can be quickly and easily installed. Total optional measure costs (including labor) must not exceed \$250.

### **Optional Measures Include:**

- Water Heater Tank Insulation
- Water Heater Pipe Insulation
- Low Flow Showerheads

### **Field guide types and approval dates:**

- Single-family: 5/26/2021
- Manufactured Housing: 5/26/2021

### **Solar & Renewables**

MDHHS-BCAEO anticipates that in upcoming years solar installations may become a common pairing with the WAP. Michigan's Department of Energy, Great Lakes and the Environment (EGLE) will be pursuing the Greenhouse Gas Reduction Fund's Solar for All program and anticipates interest in pairing Solar installations on conjunction with the WAP.

In preparation for this potential change, MDHHS-BCAEO is requesting approval to include solar PV as an optional measure in the list of measures for qualifying households and properties in the WAP.

MDHHS-BCAEO understands that solar PV projects might require a NEPA review, especially if they are ground mounted and disturb the ground.

In cases where Subgrantees opt to install solar PV and fund that measure with DOE WAP funds, the energy audit would include solar as a measure and would demonstrate the SIR of 1.0 or greater for the solar PV install, in order it to be integrated into the approved package of measures for the project. MDHHS-BCAEO believes that with the current installed costs of solar PV, it is a financially viable solution that can help some of our low-income families reduce their energy burden through WAP. We also believe that in preparing for a partnership with the EPA's Solar For All program, consideration of solar integration in the WAP is a new priority for the state.

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number:** EE0009909, **State:** MI, **Program Year:** 2024  
**Recipient:** State of Michigan

**Braiding and Co-funding Measures**

Michigan allows its subgrantees to use multiple funding streams in their WAP. With inflation rates increasing quicker than the ACPU, these strategies are more important than ever. Michigan follows the guidance in WPN 22-9. We currently do not use the approach of blending, but braiding and co funding measures are common in the Michigan WAP and buy downs are allowable in multifamily projects. Michigan follows all policies as defined in WPN 22-9 on allowability with these approaches.

**Policy Manual:**

Community Service Policy Manual 618  
Community Service Policy Manual 618.1

Field guide types approval dates

Single-Family: 9/8/2021
Manufactured Housing: 9/8/2021
Multi-Family:

**V.5.2 Energy Audit Procedures**

Audit Procedures and Dates Most Recently Approved by DOE

Audit Procedure: Single-Family
Audit Name: Other (specify)
Single Family NEAT software on nonstandard homes. Approved by DOE September 8, 2021.
Approval Date: 9/8/2021

Audit Procedure: Manufactured Housing
Audit Name: Other (specify)
Mobile Home MHEA software on manufactured homes. Approved by DOE September 8, 2021.
Approval Date: 9/8/2021

Audit Procedure: Multi-Family
Audit Name: Priority List
Approval Date:

Comments

Michigan’s Energy Audit for single family homes and manufactured homes was approved September 8, 2021. Michigan’s Region 3 DOE Sponsored Low Rise Multifamily Priority List was approved 1/24/2023. Michigan will continue to comply with the DOE requirements of energy audit approval, when applicable. BCAEO will submit revised energy audit approval requests and field guide at least 6 months in advance per WPN 23-6 and 22-4.

All dwellings scheduled for weatherization must have a comprehensive energy audit that treats the dwelling as a whole system. For single family site built and mobile homes, data from the audit is entered into the Weatherization Assistant (WA) software which then determines which Energy Conservation Measures (ECMs) are cost effective for the dwelling. For multifamily projects, data from the audit is entered into a Multifamily Audit tool or the priority list is applied to determine the weatherization scope of work. Weatherization measures for a dwelling are considered cost effective if the Savings to Investment Ratio (SIR) is 1 or greater for each measure and the job. In addition to DOE approved ECMs, there is a single exception: blower door guided air sealing may have an SIR less than 1.0, if the cumulative SIR of the package of measures is equal to or greater than 1.0, not including H&S measures. Michigan also installs health and safety and incidental repair measures as dictated by the audit on each dwelling, and in accordance with WPNs 22-7 & 19-5. Michigan will switch from WA8.9 to WAweb on 7/1/2024. Michigan has submitted a transition plan to DOE as required in WAP Memo 113. Michigan is currently working on a new data management system that will connect smoothly with the new software and that staff throughout the state are trained on the new software.

**Single family housing**

The energy audit tool, NEAT is being used for 1–4 unit buildings. Weatherization measures for a dwelling are considered cost effective if the Savings to

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

Investment Ratio (SIR) is 1 or greater for each measure and the job. Subgrantees are required to follow the policies and procedures in the Community Services Policy Manual, Michigan Field Guide, Health and Safety Plan, and the Energy Auditor Guide.

During PY24, MDHHS-BCAEO may consider adopting the Region 3 Priority List for Single Family Site Built Homes. MDHHS-BCAEO would follow the guidance in WPN 22-8 for the submission process.

**Manufactured Housing**

The energy audit tool, MHEA is being used for 1–4 unit buildings. Weatherization measures for a dwelling are considered cost effective if the Savings to Investment Ratio (SIR) is 1 or greater for each measure and the job. Subgrantees are required to follow the policies and procedures in the Community Services Policy Manual, Michigan Field Guide, Health and Safety Plan, and the Energy Auditor Guide.

During PY24, MDHHS-BCAEO may consider adopting the Region 3 Priority List for Manufactured Homes. MDHHS-BCAEO would follow the guidance in WPN 22-8 for the submission process.

**Multifamily**

If a Subgrantee requests to complete a multifamily dwelling using an energy audit tool rather than the LRMF Priority list, they will submit documentation to MDHHS-BCAEO for review. Once approved by the MDHHS-BCAEO Director, the Weatherization Specialist will work with the DOE Project Officer to review material for approval prior to commencing weatherization on 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 22-4 to complete the unit. Until Michigan receives approval for a multifamily energy audit tool, multifamily dwellings utilizing a traditional energy audit tool will remain less than 20% of Michigan’s building type production.

For energy audit purposes, per 10 CFR 440.22, a multifamily building is any building which contains five or more single family dwelling units as defined in 10 CFR440.3,with the following exception: Row houses and townhomes may be treated as single family dwellings if they have independent mechanical systems and are attached only by vertical walls that contain a continuous pressure boundary (i.e. fire rated assembly) that is not penetrated from the foundation to the highest point of conditioned space. In accordance with WPN 23-6, Michigan will submit any multifamily project details (outside of using the LRMF PL) to our DOE Project Officer for review prior to that project commencing.

Michigan followed guidance from WPN 22-8 and received approval to utilize the LRMF PL as an optional alternative to a traditional energy audit for appropriate multifamily projects. Michigan allows all subgrantees to use this option if they have access to an EA and a QCI with the multifamily training. As use of the LRMF PL has been approved by DOE, Subgrantee production using the priority list may exceed 20% of building type. Subgrantees will submit documentation for the LRMF PL and project to MDHHS-BCAEO for review and approval prior to the project initiating.

As noted in the section ‘What Structures are Eligible for Weatherization’ (V.1.2 Box 3) it is anticipated that the statewide multifamily Subgrantee will complete a significant portion of multifamily projects in Michigan. All Subgrantees may opt to do multifamily projects in their territory, but most have not pursued this option. The LRMF PL approach will be the most straightforward way for entities who do not regularly weatherize these types of projects and Michigan anticipates that most Subgrantees will only utilize this option, if any, for multifamily projects. The statewide provider and a few other Subgrantees (based on current experience) will continue to pursue any multifamily projects (both small multifamily and large multifamily) regardless of audit type.

**Fuel Switching**

In previous Program Years, Michigan has completed case by case submissions for fuel switch requests to DOE. Beginning in PY21, MDHHS-BCAEO began Grantee Administered Fuel Switching Approval. Fuel switching is allowable when the site specific energy audit demonstrates the cost effectiveness of the fuel switch over the life of the measure as indicated by the Savings to Investment Ratio (SIR). In accordance with WAP Memo 094, although electrification for the sake of electrification is not allowable, electrification to lower energy burden is allowable and encouraged. Fuel switching (including electrification) is also allowed when justified for Health and Safety (H&S) reasons. If a heat pump or other combined heating and cooling system is to replace a heating only (or cooling only) system, no savings will be attributed to the previously nonexistent cooling (or heating) system, but that all the costs of running the system throughout the year will be included in the audit. Michigan began using the Social Cost of Carbon factor to increase fuel prices as outlined in WPN 22-10. Michigan Subgrantees maintain two fuel cost libraries; one that contains the Social Cost of Carbon factor for standard measure installation, and another that does not include the Social Cost of Carbon factor to show cost justification for fuel switch requests without that factor considered.

**V.5.3 Final Inspection**

**Completed Units**

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

Per 10 CFR 440.16(g), no dwelling unit will be reported to MDHHS-BCAEO as completed until a Quality Control Inspector (QCI) has performed a final inspection and certifies that all work from the energy audit has been completed in compliance with the NREL SWS and the Michigan Weatherization Field Guide and any callback work required has been completed. No dwelling unit is reported to DOE as complete until all weatherization measures have been installed and the Subgrantee has performed a final inspection(s). This includes inspecting any mechanical work performed and ensuring that work has been completed in a workmanlike manner and in accordance with the priority determined by the audit procedures required by 10 CFR 440.21.

A complete audit and quality control inspection are required for each home weatherized. Audits include WA8.9/WAweb 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 quality control checklist which they sign and date confirming that all work from the original audit was completed to required standards. The checklist will confirm that the QCI completed the following: an assessment of the energy audit and accuracy of field site data collection, energy audit software inputs, and that measures called for on the work order were appropriate, and measure installation followed guidance in CSPM, SWS and Michigan Field Guide. An example of the quality control checklist has been uploaded and is available in the SF424. The Quality Control checklist is signed by the energy auditor, crew leader, and the quality control inspector through the various stages of weatherization. The QCI will include printed name, signature, certification number and date. If the state monitor chooses the job to monitor, the client file will also contain the name, signature, certification number and date of the state monitor.

No dwelling unit may be reported to DOE as completed until all weatherization material is installed and a final quality control inspection is performed, however, due to supply chain disruptions, some agencies have experienced extensive delays in refrigerator delivery to a client. In cases where the refrigerator delivery will delay the scheduling of the Quality Control Inspection, subgrantees may opt to cover the cost of the refrigerator out of an alternative funding source (e.g. LIHEAP), and proceed with the final inspection before the refrigerator is installed. In this case, the subgrantee must confirm receipt and installation of the refrigerator and maintain documentation in the client file. Although this has decreased during the past PY, Michigan will continue to extend this allowance so Subgrantees can effectively complete QCI inspections and meet program goals.

#### **WRF and Final Inspection**

Pre and post photographs are required (as reasonable) of all WRF measures addressed under this program. Subgrantees are encouraged to utilize this method, at minimum, to verify work orders and completion. If identified prior to a completed energy audit, Subgrantees may have Auditors review the WRF work completed during the audit confirming that the job is no longer in a state of deferral and weatherization work can proceed. Subgrantees must ensure that their QCI has confirmed that the WRF work was completed as called for in the client file.

#### **Weatherization Final Inspection Process**

The CSPM specifies the activities/tests that must be completed in a final inspection and the process for rework should the need arise. The final inspection will be conducted to confirm that all work was done to the SWS standards. Each Subgrantee is required to use a certified Quality Control Inspector (QCI) who is in good standing with the Building Performance Institute to conduct all final inspection of all dwelling units.

#### **Process for Adequate QC Inspections**

All Subgrantee final inspections are performed by a Building Performance Institute (BPI) Certified Quality Control Inspector as outlined in WPN 22-4. As of March 12, 2024, Michigan has 96 certified Energy Auditors and Quality Control inspectors serving 23 subgrantees covering all 83 counites in Michigan. Subgrantees may employ or contract for these services. Final inspection documentation and certification will be placed in the client's file.

MDHHS-BCAEO will monitor and document results in a monitoring report of at least 5% of all completed units and 10% quality assurance file reviews.

Quality Control Inspections will use the criteria outlined in the Work Quality section of WPN 22-4. The QCI will include the following:

- Assessment of the original energy audit
- Complete the Weatherization audit review checklist
- Confirm measures on work order were appropriate
- Confirm measures on work order were in accordance with policies as approved by DOE

All Subgrantees have contract language which they sign and return stating that all work performed requires the QCI. See Section V.5.1 of Master File for contract language.

Michigan's subgrantees utilize separate Energy Auditor (EA) and Quality Control inspector (QCI) per WPN 224 for each Weatherization job, with waivers issued on a case by case basis for exceptions to have the same individual act as the EA and QCI.

If a Subgrantee is not able to find a QCI, MDHHS-BCAEO will help Subgrantees identify QCIs to assist. Subgrantees are encouraged to coordinate with other Subgrantees to share energy auditors and QCIs to ensure compliance as needed.

#### **Subgrantees will provide QCI certified inspections according to the following protocol:**

**Independent QCI:** A final inspection on every home will be conducted by a QCI who was not involved in the weatherization work on the home either as the auditor or

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

as a member of the crew.

**Quality Control Inspection Checklist and State Monitoring Tools:** The QC inspection checklist is placed in the client's file and serves as a recording of all Quality Control Inspections performed on the dwelling unit(s). MDHHSBCAEO monitors record their observations on monitoring tools for their field notes to ensure work is completed in compliance with the work quality requirements outlined in WPN 224.

**QCI Shortage:** To meet production goals in a timely manner, Subgrantees are responsible for maintaining staff and/or contractual relationships with QCI certified inspectors. In the case of a shortage of QCI certified inspectors in the service territory, MDHHS-BCAEO may choose to allow the following, in accordance with WPN 22-4.

**Waiver for same individual to perform audits and QCI:** Subgrantees experiencing a staffing barrier to complete production, may apply for a limited term waiver to the separation of duties for the Energy Auditor and QC Inspector. These waivers will be approved on a case-by-case basis if there is appropriate justification, such as an inability to obtain the qualified staff. In this case, the QCI/Energy Auditor will not be involved in any of the actual work on the home. If MDHHS-BCAEO approves the waiver, MDHHS-BCAEO's state monitors will perform quality assurance site reviews on at least 10% of all completed units and 20% quality assurance file reviews for that program year. In addition, MDHHS-BCAEO may conduct more follow-up reviews and require the agency to implement a Corrective Action Plan to resolve the staffing issues within the program year or 6 months from waiver approval. MDHHSBCAEO may require the Subgrantee to schedule monthly calls with MDHHS-BCAEO to determine the agency's progress to increase staffing capacity. MDHHS-BCAEO may choose to reduce the respective Subgrantee T&TA allocation to cover the expense of increased monitoring.

The waiver submission process is outlined in CSPM for subgrantees. Subgrantees email BCAEO and identified Weatherization Staff the waiver request, and justification for why the agency is requesting a waiver, and relevant details to the job. BCAEO staff will review the details submitted requesting additional information as needed. The decision on the waiver is provided in a letter to the Subgrantee Weatherization Manager and Executive Director.

**Multifamily QCI**

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

**Disciplinary Actions:**

If a QCI Inspector is found to be negligent, either through repeat findings or gross negligence in their duties, MDHHS-BCAEO, with or without the support of a Subgrantee, may institute the following:

- Additional training
- Temporary suspension (e.g., six months)
- Permanent suspension and written notification to BPI

The level of the violation is determined by the nature of the violation and are not necessarily escalating in nature.

**Energy Auditor Decertification/QC Inspector Suspension**

**Level One:** Level One violations typically are defined as minor in nature. These types of violations will be reprimanded with a written warning to the certified Energy Auditor/QC Inspector that explains the violation along with the corrective action. Examples of Level One infractions include, but are not limited to, the following:

- Fails or refuses without good cause to exercise reasonable diligence in developing a home inspection report, preparing a report, or communicating a report.

**Level Two:** Level Two violations typically are defined as major in nature or repeated violations and/or the lack of corrective action for minor violations. These types of violations will be reprimanded with a written warning to the certified Energy Auditor/QC Inspector that explains the violation along with the corrective action. The Energy Auditor/QC Inspector is required to submit proof of corrective action in response to the violation. The warning and written response will become part of the record in the person's file. The review of the response and corrective action will be conducted to determine if the person will be suspended or temporarily suspended. Examples of Level Two infractions include, but are not limited to, the following:

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

**Level Three:** Level Three violations are defined as a serious violation. The MDHHSBCAEO 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 MDHHSBCAEO Weatherization program if the Energy Auditor/QC Inspector for a Level Three violation. The violation must be well documented and supported. A written notice of the violation and the appeal date will be given to the certified Energy Auditor/QC Inspector. If appealed, a formal hearing will be conducted within 30 business days of the receipt of the appeal request by a panel who will inform the appeals applicant in writing of its decision.

Examples of Level Three infractions include, but are not limited to, the following:

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

- Commits fraud or deceit with respect to any required license or permit application or an inspection report submitted to the subgrantee or MDHHS BCAEO.
- Violates any state or federal law, rule, permit, or order relating to the inspection and/or installation of weatherization measures.
- 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.
- 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.
- Engages in an act of fraud, misrepresentation, or deceit in the making of a home inspection.
- Pays or is paid 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.
- 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.
- 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.
- Practices as a licensed home Energy auditor/QC Inspector without a current Energy Auditor/QC Inspector certification.

**Formal Hearing**

**Panel Review Process**

The review process will include the following elements:

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

The panel will include the MDHHS-BCAEO Executive Director, the MiTEC Representative, a member from the DOE PAC, and two members from the Weatherization Network.

**Presentation**

**MDHHS-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**

The panel will review summary presentations, documentation and clarifications provided and render a decision.

- A decision based on simple majority will prevail.
- The panel spokesperson will communicate the panel's decision to the appellant and the MDHHS-BCAEO Director in writing.

**Decertification Period**

Revocation of a SOM Energy Auditor or suspension of BPI EA/QC Inspector from performing audits for the Michigan Weatherization Assistance 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 SOM Energy Auditor or suspended BPI EA / QC Inspectors may request renewal of certification at the end of the decertification period. The decertified Energy Auditor/QC Inspector must have a network Subgrantee agency sponsor this request. The suspended Energy Auditor or QC Inspector must attend IREC accredited Energy Auditor or QC Inspector training and recertification training and testing prior to reinstatement of work.

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

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

### Training and Technical Assistance

As outlined in section V.5.1 Technical Guides and Materials the Michigan field guide, Energy Auditor Manual and standards are distributed to Subgrantees and their contractors via the statewide database document center, through a link on the state's website, and through the MDHHS-BCAEO External SharePoint. The Michigan Weatherization Field Guide contains links to the SWS which can be accessed through an internet browser or on a mobile device in the field. Subgrantees are responsible for ensuring that all of their contractors and crews have access to and reviewed the Michigan Weatherization Field Guide, SWS, and Energy Auditor Manual.

### Details on State Monitoring

Weatherization technical monitoring is conducted at minimum of once a year. State monitors will perform quality assurance site reviews on at least 5% of all completed units and 10% quality assurance file reviews. MDHHSBCAEO makes every effort to have an accurate estimated production count for each agency in order to meet the 5% requirement for onsite monitoring. In cases where it is revealed through the final production count that an agency has exceed production to a point where an additional onsite monitoring would have been required to meet 5%, the MDHHS-BCAEO technical monitor will add an additional job to their onsite monitoring in the following program year.

Michigan will increase monitoring to at least 10% onsite completed units and 20% quality assurance file reviews for the program year as deemed necessary. This will occur when a case-by-case basis a waiver is extended for the same EA/QCI as outlined above in the section "Waiver for same individual to perform audits and QCI" or for Subgrantees utilizing the QCI mentor/mentee option. Michigan may also increase monitoring if determined necessary through risk assessments. If waivers are granted due to Subgrantees experiencing staffing barriers and the inability to maintain separation of duties, MDHHS-BCAEO may require and review a corrective action plan and conduct follow up (such as monthly calls) with the Subgrantee in addition to increased monitoring.

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 MDHHS-BCAEO forms 552 and 552A and ASHRAE 62.2 ventilation standard. Blower door testing of all homes is conducted during both the audit and inspection of the home by a MDHHS BCAEO certified weatherization monitor/QCI or crew person/contractor. In the transition to WAweb BCAEO staff plan to determine and populate statewide fuel costs for Michigan to be used by Subgrantees in WAweb libraries. Subgrantees who wish to calculate their own fuel costs may submit justification for prices to be reviewed by technical staff. BCAEO staff anticipates calculating fuel costs regularly and providing updates as WAweb allows. On February 16, 2023 BCAEO also received approval to utilize the Non-Energy Impacts (NEIs) as outlined in 2210. Michigan allowed agencies to utilize the new fuel prices, including the NEIs in PY22 and will include them in the PY24 utility price calculations.

Individuals conducting state monitoring for MDHHS-BCAEO as the lead monitor will have active QCI certifications and possess the skills outlined in NREL JTA for QCIs. They have also attended Comprehensive and Specific training for other Home Energy Professional (HEP) categories and possess the skills outlined in the NREL Job Task Analysis. Multifamily (5+ units) monitoring will be completed by state monitors with the BPI QCI certification who have completed multifamily QCI comprehensive training. Michigan technical monitoring of Subgrantee dwelling units will not be completed by the same QCI certified individual that had completed the Subgrantee's energy audit or Final Inspection of the same dwelling unit.

MDHHS-BCAEO will contract QCI work as needed. As of March 12, 2024, MDHHS-BCAEO has three technical monitors on staff, four additional staff who have obtained QCI certification and are monitoring, and one additional staff preparing for their QCI certification. Additionally, MDHHS-BCAEO has a Technical Weatherization Specialist who has a QCI certification.

**Policy Link:** <https://www.michigan.gov/mdhhs/doing-business/weatherization/manuals>

Link under CSPM 600 Series – Weatherization Assistance Program. Final PY23 Policy Manual and Draft PY24 Policy Manual

#### Policy Manual:

Community Service Policy Manual 603  
Community Service Policy Manual 618

## V.6 Weatherization Analysis of Effectiveness

Michigan's population estimates are 10,077,331 with approximately 13.4% living in poverty according to the 2022 American Community Survey. According to the release of the United Way's ALICE Report, 39% working in Michigan households struggle to afford the necessities like housing, childcare, food, technology, health care, and transportation. The [National Low Income Housing Coalition](#) states that across Michigan, there is a shortage of affordable rental homes for people with incomes at or below the Federal Poverty Level. Many households are spending more than half of their income on housing.

#### Key Facts:

- 312, 660 Renter households that are for extremely low-income households
- \$25,750 Maximum income for 4person extremely low-income households
- 204,728 Shortage of affordable rental homes for extremely low-income households



**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

**Low-Income Energy Affordability Data:**

The Low-Income Energy Affordability Data ([LEAD](#)) Tool shows the following by Federal Poverty Level:

Federal Poverty Level	Average Energy Burden (% income)	Average Annual Energy Cost (\$)	Housing Counts
150% 200%	5%	\$2,140	353,636
100% 150%	7%	\$2,095	325,574
0 – 100%	16%	\$2,052	468,727

**MDHHS-BCAEO Effectiveness Analysis**

MDHHS-BCAEO will utilize all tools listed below to analyze the effectiveness of subgrantee weatherization, productivity, expenditure, and energy savings goals. This information drives the development of Training & Technical Assistance (T&TA) activities, priorities for the network, focus of monitoring of the program and each subgrantee.

Some of the listed items are detailed further below, as they are not outlined in other parts of this plan.

**Production and Expenditures**

Each Subgrantee must maintain a rate of production and expenditures to ensure that all DOE WAP funds are expended in a timely manner each program year. Production is monitored and quarterly letters may be sent to each Subgrantee. The letters outline the agency's success rate of achieving their own production goals and compare each agency's production and expenditures compared to those rates of the entire state. MDHHSBCAEO has also created production and expenditure dashboards so that Subgrantees can see statewide production results in real time and compare themselves to other local Weatherization operators. Annually, MDHHS-BCAEO assess which agencies are the most behind and may require either one or regular responses from the agency as to how they plan to catch up. It should be noted that when necessary, MDHHS-BCAEO may reallocate WAP funding from underperforming Subgrantees and provide those dollars to Subgrantees that are meeting or exceeding performance and have the capacity to spend the funding out by the end of the program year. At the end of the program year, MDHHS-BCAEO issues a program year summary letter to each agency, outlining their success in production and expenditures, as well as their success in staying on track proportionately with capped cost categories, such as Admin and Health & Safety, and staying under the maximum allowable ACPU. Subgrantees may be put on a corrective action at this point in time, if they have not met goals. In PY23, Michigan Weatherization Leadership began meeting with Subgrantee Weatherization Leadership for brief meetings to discuss expansion efforts, challenges, and successes for the specific Subgrantee. The meetings are intended to identify additional support MDHHS-BCAEO can offer each Subgrantee (T/TA) and identify strengths within the network. These meetings are anticipated to happen 2-3 times in PY24 with each Subgrantee.

**Performance Evaluation and Monitoring**

MDHHS-BCAEO shall perform grant monitoring through activities such as:

- Conducting onsite monitoring.
- Current level of expenditures for all active weatherization related programs.
- Depth of existing waiting list.
- Financial and program management capacity.

Monitoring feedback is the basis for updating all monitoring tools. MDHHS-BCAEO reviews the following items to assess the weatherization program and requirements.

- Low or no citations during onsite inspections of weatherized and in progress units
- Ability to achieve and maintain Quality Control Inspector certification
- Successful programmatic & financial monitoring with no or low amounts of citations, specifically around the WAP
- Clean agency audit
- Ability to meet and/or exceed production and expenditure goals
- Positive trend analysis/performance reviews
- Low risk agency and WAP as determined by the BCAEO STAR risk assessment, or other risk assessment tool utilized by BCAEO
- Quick response and thorough corrections to issued corrective action

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

If carryover funds are available, funds will be distributed to eligible Subgrantees based upon their capacity to take additional funds.

Subgrantees on a 1.) Quality Improvement Plan (QIP), 2.) who fail to utilize 90% of their award based on the Subgrantees original allocation at closeout, 3.) or are identified as a high risk in the STAR Assessment, will not be eligible to receive carryover funding unless approved by MDHHS-BCAEO. If a Subgrantee has the willingness and capacity to complete a multifamily project in conjunction with MDHHS-BCAEO and DOE, carryover funds may be made available for this project depending on the amount of funds available and the capacity of all entities involved.

### **Trend Analysis/Performance Reviews**

The MDHHS-BCAEO technical staff 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 MDHHS-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 entered into a database which allows MDHHS-BCAEO to track findings and training and technical assistance provided to the agency. Tracked information includes all relevant information pertaining to the monitoring review and is uniquely identified with a record id call MVID (Monitoring Visit Identification Number). 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. The monitor will then provide narrative on progress. Detailed information on findings, concerns and recommendations is also collected to use in developing training and technical assistance plans. MDHHS-BCAEO also reviews the database at a statewide level for monitoring findings and citations by category to better understand the technical areas that have the most potential for improvement. This information drives what training is administered and required in the next program year as well as specific areas of focus for the next program year's onsite monitoring engagements.

### **Technical and Financial Systems**

MDHHS-BCAEO leadership for the technical, financial, and programmatic teams work closely to review monitoring tools and identify improvements. Monitoring policy and technical monitoring tools are revised to continue to mitigate implicit bias and increase consistency in monitoring.

Technical, financial, and programmatic monitoring tools are reviewed routinely and updated to ensure MDHHSBCAEO practices do not contain any implicit bias or lacks equity. Monitoring report formats and language is also being improved to ensure all stakeholders can clearly identify performance deficiencies. In addition, MDHHSBCAEO has hired a compliance officer to assist subgrantees with monitoring disputes.

### **Path of Continuous Improvements**

MDHHS-BCAEO conducts the STAR Assessment to develop a risk based monitoring approach and to develop a comprehensive training plan. STAR Assessment reports are sent to the agencies provide them feedback on performance improvements and training options to ensure continuous improvements in the field. Monitoring is conducted and feedback shared in a monitoring report with the agency to assist in improving performance.

When a Subgrantee extensively fails work quality, SWS, and field guide compliance as identified in technical monitoring or fails a financial/programmatic monitoring (large, disallowed costs/improper financial accounting for federal funds), the subgrantee will be placed on a Quality Improvement Plan. Frequency of subgrantee monitoring is increased, and technical assistance or training may be required. Subgrantees Quality Improvement Plans (from final inspections and monitoring findings) are evaluated for performance improvements with additional oversight, regular meetings and feedback reports, full monthly financial report reviews prior to payment, and/or regular review of support documentation received in the MDHHSBCAEO SharePoint site.

### **STAR Risk Assessments**

MDHHS-BCAEO will conduct risk assessments, STAR Assessment, for each subgrantee prior to the start of a grant agreement and more frequently if needed. The STAR Assessment identifies areas of high risk in key areas that are not limited to but including financial internal controls, financial procedures, single audit findings, technical performance, ability to meet production and expenditure goals, ability to not exceed the average cost per unit, ability to submit reports timely, ability to report accurately and timely, ability to properly administer health and safety standards, ability to ensure staff qualifications are current, and ability to ensure quality work and compliance through contractor/crew management. The STAR Assessment is used to develop a risk based monitoring approach and training/technical assistance plan. During monitoring, any key areas that have a highrisk score is focused on during monitoring.

### **How are the comparisons used to develop training opportunities and priorities?**

Statewide training opportunities and priorities are developed through several assessment tools. The STAR Assessment, which is conducted annually, provides MDHHS-BCAEO and MiTEC (Michigan Training and Education Center) the top key areas of high risk in the network. Training is developed to address these areas. In addition, MiTEC will also provide onsite technical training for a region or for an agency to address training needs. Michigan plans to focus specific onsite technical training with MiTEC as the network brings on new contractors in expansion efforts. Additional details are located in the T&TA plan. Monitoring results, as outlined in the monitoring report, also identify training needs in the network that MiTEC incorporates into training classes. Priorities for increased training and onsite technical assistance is generated by a high percentage of agencies demonstrating deficiencies. Michigan's Weatherization Technical Team (Monitors, MiTEC Instructors, Coordinators and Wx Leadership) have regular meetings to share feedback with the team to strengthen the connection between training provided and deficiencies seen through monitoring. Additionally, focus areas for training are identified throughout the year and considered as topics for the Michigan Annual Technical Conference.

### **Action Around Ineffective Subgrantees**

If an agency significantly underproduces or underspends, MDHHS-BCAEO may reduce the agency's allocation in the next Program Year. If MDHHS-BCAEO

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

determines that the Subgrantee was identified as high risk in two consecutive years and/or the Subgrantee is not meeting the goals in the agreed upon plan, the Subgrantee grant may be terminated in accordance with 10 CFR 440.15(e).

In order to ensure that there are not extended periods without service to any area, MDHHS-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 Subgrantee have been made. 10 CFR 440.15 will be followed in selecting a permanent replacement provider.

In the event the statewide Request for Weatherization Subgrantees results in some areas not being served, or if a provider of an area rescinds its selection as the local Weatherization provider, MDHHS-BCAEO may appoint a provider for those areas until another competitive bidding process is scheduled for the WAP.

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 or displays significant work quality deficiencies. Any reallocation will be 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 wait list (in progress jobs)
- Meeting of selfimposed benchmarks (identified in Subgrantee production plan)
- Financial and program management capacity

**Incorporating Utility Usage Data**

MDHHS-BCAEO will work with the Michigan Public Service Commission (MPSC), utilities, other data analysis and research contractors, and database system administrators 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. As Michigan transitions to a new database system, how utility data is collected and entered will be evaluated within the functionality of the system. Upon establishing collection and entry process, Michigan will work to assess impacts of Weatherization on utility usage. BCAEO will then utilize the pre and post utility data to identify trends of energy savings by each agency as an added element of analysis of effectiveness. This is a long term goal and project. It is anticipated that during PY24, Michigan will focus on the transition to empowOR and WAweb.

**Management Mechanisms for improvement**

Planned activities include:

- Development, implementation, and recognition of the DOE State Plan Development workgroup.
- Monthly updates in the BCAEO Update
- 1-3 Weatherization Manager in person Meetings (as needed)
- Regular Weatherization Manager Webinars (as needed)
- 1 Conference (as needed and approved by the State of Michigan)
- Training on Field Guide
- Timely Monitoring Reports
- Streamlined and updated tools for weatherization in the Statewide Database
- Diverse PAC stakeholders
- MiTEC Training Board
- Weatherization Leadership Committee Strategic Planning
- Multifamily Project Coordination
- Statewide Client Education Coordination

**Market Analysis**

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number:** EE0009909, **State:** MI, **Program Year:** 2024  
**Recipient:** State of Michigan

In 2021, MDHHS-BCAEO participated on the NASCSP committee to conduct a Weatherization Salary and Wage Survey. MDHHS-BCAEO has actively supported the Salary Survey and highly recommended participation by the subgrantees. Michigan plans to contribute to additional Market Analysis efforts that NASCSP conducts.

**Costing of Measures**

Subgrantees are required to use accurate pricing. MDHHS-BCAEO requires that subgrantees to conduct a request to proposal to develop a contractor list. All vehicles and equipment cost of \$5,000 or more require prior approval from MDHHS-BCAEO. Vehicle and equipment requests using DOE funds are then sent to DOE for approval as required.

**Policy Link:** <https://www.michigan.gov/mdhhs/doing-business/weatherization/manuals>

Link under CSPM 600 Series – Weatherization Assistance Program. Final PY23 Policy Manual and Draft PY24 Policy Manual

**Policy Manual:**

Community Service Policy Manual 603  
Community Service Policy Manual 618.1

## V.7 Health and Safety

In PY23 and in PY24, Michigan requests the Health & Safety (H&S) limit be raised to 35% of Program Operations. H&S measures are not considered as part of the cumulative SIR and do not need an SIR to install.

Buildings that cannot be weatherized without the H&S measures shall be deferred if the H&S costs cannot be completed within the H&S thresholds or under a case by case waiver. For that reason, agencies may justify using deferral reduction funds (WRF or other funding sources as available) in instances where waivers are not approved or where agency funds are documented as depleted or trending to be depleted before the end of the PY.

Health and Safety measures are billed to their own cost category. Subgrantees ask a series of questions during intake and energy audit related to occupant health conditions to capture any preexisting conditions. Some Subgrantees have implemented a preassessment visit to homes which allow a trained Weatherization staff to look for common issues for health and safety issues or deferral.

**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.
- The elimination of energy related H&S hazards that are necessary before or because of the installation of weatherization measures.
- Items as identified as allowable for H&S spending in the Michigan Health & Safety Plan (CSPM 614) and DOE funds shall not be used to meet code compliance.

The Health and Safety plan and policy can be found in the CSPM 600 Series.

Please see the Michigan H&S Plan attached to the SF 424 for all H&S details.

**Policy Link:** <https://www.michigan.gov/mdhhs/doing-business/weatherization/manuals>

Link under CSPM 600 Series – Weatherization Assistance Program. Final PY23 Policy Manual and Draft PY24 Policy Manual

**Policy Manual:**

Community Service Policy Manual 606  
Community Service Policy Manual 614

## 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 (MDHHS), Bureau of Community Action & Economic Opportunity (BCAEO) which is under the Bureau of Community Services Division. The MDHHS mission is to provide opportunities, services, and

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

programs that promote a healthy, safe, and stable environment for residents to be self-sufficient. The vision of the Department is to develop and encourage measurable health, safety, and self-sufficiency outcomes that reduce and prevent risks, promote equity, foster healthy habits, and transform the health and human services system to improve the lives of Michigan families.

The MDHHS-BCAEO was created by the state legislature to oversee activities of Michigan Community Action Agencies (CAAs) and administer the U.S. Department of Energy Weatherization Assistance Program and the U.S. Department of Health and Human Services Community Services Block Grant. CAA services include programs that address education, emergency services, employment, health, housing, income management, linkages, nutrition, and self-sufficiency. CAAs are the primary subgrantees for the Weatherization Assistance Program in Michigan. MDHHS-BCAEO is responsible for the administration and oversight of the WAP in accordance with the conditions set forth in the approved DOE State Plan. In addition to WAP, MDHHS-BCAEO administers LIHEAP Weatherization funds and additional grants administered by CAAs. Responsibilities include statewide programmatic and fiscal planning and development, training and technical assistance (T&TA), monitoring, evaluation, and reporting. MDHHS-BCAEO annually contracts for program delivery activities with approximately twenty-seven local CAAs. Twenty-three of the twenty-seven CAAs are weatherization subgrantees.

MDHHS-BCAEO staff oversee several contracts and provide written policy and procedures for these various program areas. They also provide training to CAA staff on contract related policy, eligibility issues, etc. and technical weatherization staff deliver training and conduct review for state inspector certification. MDHHS-BCAEO staff conduct annual programmatic, technical, and financial monitoring reviews for each subgrantee. The MDHHSBCAEO Executive Director and MDHHS-BCAEO Deputy Director oversee all personnel within the MDHHSBCAEO and MiTEC. Personnel include grant managers, financial monitors, programmatic monitors, technical weatherization monitors, a CSBG specialist, a weatherization manager, two weatherization specialists, admissions training specialist and administrative support staff. The MDHHSBCAEO Executive Director also oversees the MPHI affiliates who staff MiTEC, the Michigan Training Center. The MPHI affiliates are a Manager, Technical Instructors, Weatherization Coordinators, Weatherization Analysts, Program Assistant(s), Data Reporting Specialist, and a ROMA Data Integration Coordinator.

In PY23, MDHHS-BCAEO expanded the weatherization leadership team by adding a weatherization manager and a technical weatherization specialist. This expansion of the weatherization leadership provides Michigan the support at the state level to administer the program at a high level and support the Michigan network in weatherization efforts.

The MDHHS-BCAEO Organizational Chart has been attached to SF424.

Michigan's WAP funds are distributed via an allocation formula that was revised to reflect the current conditions and energy conservation needs in Michigan based on the 2010 census. It uses a formula that includes a population factor, a territory size factor, and a heating degree day factor. Michigan will update the allocation formula with updated census information in the following program year.

MDHHS-BCAEO may consider a competitive process to select additional subgrantees in PY24 to address capacity issues and to address statewide contractors for multifamily work, statewide energy auditors/quality control inspectors, and statewide contractors for single family work. If run, the competitive bid process will be developed using MDHHS's internal procurement of services rules and regulations. A timeline has not been established. Prior to running, an evaluation of PY20-23 goal accomplishments in production and expenditures will assist in the determination of a competitive process for statewide single family work. The described solutions are intended to build the network and enhance its ability to meet the goals of the weatherization assistance program. MDHHSBCAEO will consider bids from multiple weatherization operators forming together to submit a statewide proposal for expansion. Request for proposal documents will be submitted to DOE prior to release.

## V.8.2 Administrative Expenditure Limits

Not more than 7.5% of the grant can be used for administrative purposes by the state (MDHHS-BCAEO). Subgrantees receive an allocation of 7.5% of the total DOE WAP allocation for administrative costs. This 7.5% is allocated across all Subgrantees by the allocation formula.

## V.8.3 Monitoring Activities

The overall goals of monitoring are to assure compliance with federal and state rules and policies, as well as examine the efficiency, quality and effectiveness of Subgrantee operations. An additional goal is to identify and correct issues and improve performance that have the potential to cause major program deficiencies. Because work with Subgrantees has a broader focus than compliance, T&TA dollars may fund activities in this area.

### General monitoring strategies include the following:

\*To note, the description below references FACSPRO as this has been the historical statewide database. In PY24, this will transition to CSST empowOR. Documentation retention will occur in empowOR as the system allows; or will be maintained in SharePoint or other agency systems as needed. During the transition for the Michigan WAP, MDHHS-BCAEO will communicate and determine where the components will be located.

- Desk monitoring: Desk monitoring includes ongoing reviews of monthly programmatic and financial data submitted by subgrantees. Programmatic data from each household served is available and reviewed from the statewide database FACSPRO system. Examples of data include estimated and final cost data by measure and by job, mechanical test results, and blower door readings. A sample of the Subgrantee's monthly expenses and invoices are reviewed as well as allocations. Fiscal review includes single audit

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

review, examining expenses for compliance, performing a limited review of internal controls, and financial reconciliation.

- Subgrantee visits: Each Subgrantee receives at least one onsite field visit per year, monitoring a minimum of 5% of all weatherized households statewide, unless a waiver for the Energy Auditor and QCI to be the same person on a job (see Final Inspection section, above) is approved by MDHHSBCAEO, then MDHHSBCAEO will monitor at least 10% of all weatherized households in a select service area. In addition, each Subgrantee receives a minimum of one administrative (programmatic and financial) monitoring onsite visit per grant cycle (typically once every three years with desk reviews in between onsite visits). In the case that a Subgrantee does not have an office location in Michigan, programmatic and financial monitoring will be completed virtually.
- **Risk Assessment:** A risk assessment called STAR (State Technical Assessment Report) is conducted at the start of the program year or prior to the start of a new grant contract (and modified throughout the year as needed), as a riskbased approach to monitoring; to determine priority in monitoring, to setup a monitoring schedule, to prepare the monitoring plan, and to establish custom subgrantee training and technical assistance. For both field and administrative monitoring, additional visits are scheduled, as needed, to address specific Subgrantee issues as they arise. If at any time BCAEO determines it will utilize another risk assessment tool, that tool will be utilized in the same way as the STAR outlined above.
- Inspections of completed dwellings are conducted to determine compliance with federal and state requirements, client satisfaction, and work quality.
- MDHHS-BCAEO also may choose to visit "in progress" jobs. All MDHHS-BCAEO household inspections are completed by or in conjunction with a certified Quality Control Inspector prior to being moved to Final Close Out in WxPro\*.
- MDHHS-BCAEO has developed a field/technical, a programmatic, and financial monitoring tools. The programmatic, financial, and field/technical tools are reviewed annually. These tools are used to ensure that planned monitoring reviews are completed consistently in the field and to appropriately document the results. The tools are available for the Project Officer to review during DOE monitoring visits. During PY23 and PY24, the field/technical tools will receive a deeper review and update process.
- **Household file reviews:** MDHHS-BCAEO staff reviews data and household files for compliance using subgrantee data, forms, signatures, bids, invoices, and other documentation. The file review sample may include those dwellings that are selected for onsite inspection. In depth household file reviews are conducted by field monitors during the monitoring engagement. Programmatic and financial monitors randomly sample files during onsite visits to demonstrate compliance with DOE, MDHHS-BCAEO, and local Subgrantee policy.
- Subgrantees are required to upload files of dwellings to be inspected by MDHHS-BCAEO field monitors to the secure database system.
- **Certification/Licensing Monitoring (Previously called Annual Monitoring):** All Weatherization Subgrantees must maintain information on the workers in their JTAs and provide information to BCAEO upon request. Weatherization technical monitors, coordinators and specialist review the documentations supporting the trainings, certifications, insurance, and licenses held by individuals/companies in the WAP. This includes LRRP EPA compliance. Monitoring may include a selected focus area or a sampling of contractors/individuals during each cycle.
- **Programmatic and Financial Monitoring:** These reviews include follow up on issues raised in the premonitoring planning, in the STAR Assessment, or other selected risk-based monitoring plan as well as any other administrative and/or financial issues as needed, including but not limited to:

0 Program overview

0 Equipment/Inventory/Materials

0 Client/Household eligibility

0 Distribution of services between renters and owners

0 Distribution between counties within the Subgrantee service territory

0 Reporting compliance

0 Internal controls related to financial management and operations

0 Fiscal Audits

0 Payroll/Personnel

0 Vehicles and equipment

0 Subawards/Subgrantee monitoring

0 Invoicing

0 Records retention

0 Staff qualifications and training

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

0 Handling of monitoring results and follow up

0 Inventory records

0 Contractor/crew qualifications

0 Procurement procedures

0 Outreach efforts to incorporate minority and disadvantaged contractors

- **Field Monitoring visits:** All MDHHS-BCAEO field inspections are conducted by a certified Quality Control Inspector and will ensure compliance with the Standard Work Specifications. These reviews include follow up on issues raised in desk monitoring, prior monitoring reports, as well as any other issues as needed, including but not limited to:

0 Administrative field work (Client file review, Work orders, Audit reporting)

0 Energy audits

0 Training & Technical Assistance activities and needs

0 Weatherization of units

0 Health and safety

0 Final inspections and verification that all inspections are performed by a QCI

0 Handling of monitoring results and follow up

0 Compliance with Lead Safe Work practices

0 Compliance with Standard Work Specifications (SWS)

All monitoring is conducted in accordance with the guidance in WPN (Weatherization Program Notice) 204. All monitoring tools have been updated to reflect DOE program requirements. The combined programmatic/financial compliance monitoring and technical monitoring will satisfy the DOE monitoring requirements.

Monitoring reviews are coordinated through Subgrantee staff. Tentative monitoring schedules are set early in the program year. Monitoring schedules may be adjusted based on the needs of the agency and BCAEO Weatherization staff.

Depending on the type of monitoring (programmatic, technical, financial), the Subgrantee has a specified number of days to complete the corrective action and provide proof of correction to the monitor. The number 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, MDHHS-BCAEO will establish a Quality Improvement Plan (QIP) for the subgrantee and increase monitoring to address said deficiencies until the MDHHSBCAEO determines the agency has improved. It is expected that with the implementation of the in-progress monitoring, that MDHHS-BCAEO will be able to identify deficiencies earlier, rather than later if they exist. In progress reviews will be planned when MDHHS-BCAEO is fully staffed. MDHHSBCAEO monitors also utilize Technical Assistance Plans (TAP) and Corrective Action Plans (CAP) as part of monitoring to improve Subgrantee performance. The CSPM 1300 provides a policy for monitoring.

### Technical 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 MDHHS-BCAEO policies. Technical monitoring may 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 libraries (to be reviewed on a regular basis)
- Fuel Costs (reviewed as appropriate)
- Input report and recommended measures report
- Contractor licensing, certifications, and insurance requirements

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

- Work specifications
- Quality control procedures
- Approved Audit Inspection, Work Order, Cost Center (IWC) completeness and storage
- Financial reconciliation for all job cost and invoicing reported on the Cost Center\* (For PY24, BCAEO is determining the new structure of the Cost Center)
- Compliance with blower door testing requirements
- Combustion appliance testing protocol
- Correct audit selection & completion
- Trend analysis of best practices, observations, questioned costs, or findings
- Optional: An inprogress site visit with the contractor/crew (working)

Technical Monitoring Reviews will be completed onsite for at least 5%, or more if appropriate or approved through a waiver (10%), of the completed units. Technical monitors will also conduct an increased onsite monitoring for Subgrantees with significant deficiencies. BCAEO considers the time in the Program Year that the deficiencies are discovered, the amount of production the agency does, and the specific role of the program where those deficiencies are noticed to determine the number, and which portions, of the jobs to be reviewed in the increased monitoring. File selection and review will be based upon 10% of scheduled production. For the monitoring selection, MDHHS -BCAEO may conduct a randomized pull of completed jobs as a base for technical monitoring visits. BCAEO may also prioritize other specific jobs for any reason, including, but not limited to: concern on a specific job because of previous interaction with the Subgrantee or client; concern about a specific energy auditor, contractor/crew or QCI; specific interest in reviewing an identified housing type of particular concern, interest in monitoring specific measure installation.

For technical monitoring, a weatherization monitoring report, including observations, findings, concerns, recommendations and corrective action requirements, is completed by the technical staff. After agency technical responses have been received, a management decision letter is sent that includes all accepted corrections and notes outstanding issues. The Subgrantee and BCAEO technical staff repeat this process until the BCAEO technical staff determine that the monitoring is resolved. Any emergent Health and Safety issues that are identified during onsite monitoring, particularly if they present an imminent danger to occupants, will be addressed immediately by monitor and the Subgrantee. Monitoring Reports and Management Decision letters are reviewed by supervisory staff, approved by the MDHHS-BCAEO Executive Director, and then forwarded to the agency's Executive Director with a copy to the weatherization manager/coordinator.

All MDHHS-BCAEO technical monitors providing monitoring for WAP file and site visits must have a QCI certification. MDHHS-BCAEO Technical staff is required to perform all diagnostic testing along with monitoring all installed measures to ensure they have been correctly installed. The technical staff takes photographs during monitoring and conducts file reviews to ensure Subgrantee compliance. 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.

WRF monitoring is included in technical monitoring reviews. At the beginning of the monitoring engagement, monitors will confirm if any jobs closed at the time of monitoring for the subgrantee have WRF spent. If so, the monitoring sample will include a job with WRF for file review and onsite review when possible. MDHHS-BCAEO will ensure that the monitoring pulls for the majority of subgrantees will include at least one job with WRF funds expended. When the technical monitor pulls the 10% files, they determine if WRF funds were spent on the job and if so, on what activities. If a job included in the 5% onsite review includes WRF spending, the technical monitor will confirm those expenditures were conducted as billed. Monitoring of WRF will include reviewing pre and post photographs will be included in the client file for WRF measures and that the Subgrantee's QCI must sign off that WRF work was conducted as called for in the client file.

#### **Programmatic and Financial Monitoring**

The programmatic and financial monitors will compose a monitoring report, including recommendations, findings, and best practices that is also shared with the agency's Executive Director and Subgrantee's Board Chair. This document is reviewed by supervisory staff, approved by the MDHHS-BCAEO Executive Director, and then forwarded to the agency's Executive Director with a copy to the weatherization manager/coordinator.

Weatherization programmatic compliance and financial monitoring will be conducted with the Subgrantee a minimum of once a year. The monitor prepares for the monitoring by reviewing monitoring reports, corrective action requirements, and correspondence. 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 Uniform Guidance, as applicable. In accordance with 2 CFR 200.425(a)(2), only those Subgrantees expending more than \$750k in total Federal Funding annually will receive FINANCIAL AUDITS funding identified in the Grantee's SF424a Budget. This is typically all Subgrantees in Michigan's program. The Subgrantees are responsible for obtaining their own audit services. MDHHS-BCAEO receives a copy of the audit report and prepares management decisions as needed.

#### **Monitoring Reports (Technical, Programmatic, and Financial)**

Technical staff, programmatic monitors, and financial monitors provide oversight and compliance reviews for the weatherization program. MDHHS-BCAEO monitoring policy requires they offer of an entrance and exit interview with the Executive Director and/or designated staff for each monitoring review.



**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

MDHHS-BCAEO will issue monitoring reports within 30 days after the exit conference from each monitoring review. A written response to corrective action will be required of subgrantee's within 30-60 days of receipt of the monitoring report unless noted in the monitoring report. MDHHS-BCAEO also has a custom Grants Management and Monitoring Database that tracks all monitoring activities and follow up until closeout.

**Training and Technical Assistance**

A system has been setup in the Monitoring Access Database to track Subgrantee and MDHHS-BCAEO monitoring findings, concerns and recommendations by auditor/inspector, contractor, and/or worker to assist in planning training and technical assistance activities. Additional days may be added to the agency visit if monitoring results identifying a need for additional T&TA for the agency.

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 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, and on what date.
- Subgrantees are responsible to ensure that their contractors and staff participate in all required trainings.

Process for reviewing the success of the monitoring policies and resolving any issues that affect the quality and impartiality of the inspection process.

0 MDHHS-BCAEO Weatherization staff meet on a weekly basis for a regular check in on the monitoring process and any difficulties in accomplishing monitoring.

0 The team identifies common issues that occur more commonly and determine the best way to address any of those challenges with the network as a whole.

0 The group of technical monitors rotates agencies that they monitor approximately every 35 years to ensure that each agency receives diverse perspectives from the technical monitoring team.

0 The monitoring schedule is built to avoid any potential or perceived conflicts of interest. For example, one of BCAEO's technical monitors came to the State from an agency, so he has not been assigned to monitor that agency as that would mean monitoring previous coworkers and colleagues.

Attachments:

MDHHSBCAEO Fiscal Monitoring Tool

MDHHSBCAEO Programmatic Monitoring Tool

MDHHSBCAEO Technical Monitoring Tool

MDHHSBCAEO Tentative Technical, Programmatic and Financial Monitoring Plan

**Policy Link:** <https://www.michigan.gov/mdhhs/doing-business/weatherization/manuals>

Link under CSPM 600 Series – Weatherization Assistance Program. Final PY23 Policy Manual and Draft PY24 Policy Manual

**Policy Manual:**

Community Service Policy Manual 603  
Community Service Policy Manual 1300

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

The PY24 Training and Technical Assistance Plan is in the new DOE Training and Technical Assistance Plan template see attached to the SF424.

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

- Maintain and increase the efficiency, quality and effectiveness of the WAP at all levels
- Maximize energy savings within Michigan's WAP

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

- Ensure the Health and Safety of lowincome households and WAP workers
- Increase the effectiveness of client education
- Improve the quality of weatherization work performed on dwellings
- Improve program management and administrative procedures within Michigan's WAP

**Policy Link:** <https://www.michigan.gov/mdhhs/doing-business/weatherization/manuals>

Link under CSPM 600 Series – Weatherization Assistance Program. Final PY23 Policy Manual and Draft PY24 Policy Manual

- Community Service Policy Manual 611 - Client Priority Selection Criteria
- Community Service Policy Manual 612.4 - Applicant File Documentation Client Energy Education
- Community Service Policy Manual 618 - Technical Weatherization Training
- Community Service Policy Manual 618.1 - Inspector Certification

Percent of overall trainings

Comprehensive Trainings:	62.0
Specific Trainings:	38.0

Breakdown of T&TA training budget

Percent of budget allocated to Auditor/QCI trainings:	65.0
Percent of budget allocated to Crew/Installer trainings:	30.0
Percent of budget allocated to Management/Financial trainings:	5.0

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

In an event of a declared natural or manmade disaster or a declared emergency at the state or federal level, MDHHS-BCAEO will allow Subgrantees to assist their eligible clients with weatherization funds to the extent that the services are in support of eligible weatherization work.

All Subgrantees 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.
- Services are in support of eligible weatherization (or permissible reweatherization) 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.
- 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. Costs to help assist in disaster relief must be appropriately allocated according to the Uniform Guidance of 2 CFR 200.405.

The following applies to DOE Expenditures:

- Per WPN 24-1, ACPU limits still apply.
- Allowable uses for Weatherization Readiness Funds (WRF), as outlined in the MDHHS-BCAEO WRF Plan and CSPM

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
STATE PLAN / MASTER FILE WORKSHEET  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

- 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 is limited to the current maximum reimbursement Subgrantee contract.

**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 if 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**

Michigan will follow the requirements of CFR 440 10 CFR Part 440.18 stating 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, local authorities have deemed that the dwelling unit(s) are salvageable and habitable and repair of the damage to weatherization materials is not paid for by insurance or other forms of compensation.

If the Disaster Plan is enacted, MDHHS-BCAEO will seek approval from the DOE Project Officer for permission to proceed with a determination of homes available for reweatherization. These homes will be reported separately as required by DOE. MDHHS-BCAEO and subgrantees will count these jobs 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 considers any previous energy conservation improvements to the dwelling. In compliance with WPN 127, should Michigan's WAP need to utilize the Disaster Planning and Relief plan, homes which have been weatherized before the 15 year "rolling" date can be weatherized due to natural disasters. Details of the MI Disaster Plan are in CSPM 624.

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

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

**Funding for Disaster Planning and Relief**

If MDHHS-BCAEO approves a Subgrantee 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 Subgrantee requests additional funding for the disaster relief efforts, MDHHS-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.

# Weatherization Grantee Health and Safety (H&S) Plan- *Optional Template* CSPM 614 Attachment

## 1.0 – GENERAL INFORMATION

Additional information that does not fit neatly in one of the other sections of this document.

### REFERENCES

- Department of Energy Weatherization Assistance Program State Plan
- WAP Agreements
- DOE Weatherization Program Notice 22-7, 19-5
- Michigan Weatherization Field Guide
- CSPM 606.1 Program Requirements – WAP Auditing Tools

### PURPOSE

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

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

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

### POLICY

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

- H&S funds cover the cost of testing and the installation of measures.
- Health and Safety spending is limited in light of the primary energy conservation purpose of the Weatherization Assistance Program. Generally, H&S expenditures will be limited to an average H&S cost per unit. See section 3.0 for details.

### Health and Safety verses Energy Conservation Measures

Some measures can qualify as either a Health and Safety or an energy conservation measure, such as heating system replacements. When the measure can be cost-justified through an audit, the measure must be treated as an energy conservation measure. When the measure is not cost-justified through an audit, it cannot be treated as an energy conservation measure and therefore will only then be allowed to be entered as a H&S measure.

## **Mandatory Health & Safety Measures**

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

## **Emergency Procedures**

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

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

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

## **Reporting of Emergency Situation Requirements**

Reporting the emergency is not an indication for action to be taken by the State's Weatherization Office, it is just a reporting requirement to track emergency situations. Subgrantees should report emergency situations identified at any stage of the weatherization work (audit, installation, quality control inspection).

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

## **Reporting of Other Situation Requirements**

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

## **Hazardous / Emergency Situations Identified During Monitoring**

If a hazardous situation that must be addressed imminently is identified by BCAEO Technical staff while onsite, Subgrantees must follow the direction of BCAEO Technical staff to address the issue identified. Monitors may encounter emergent life-threatening situations which require the conclusion of the monitoring visit (as outlined above); or may encounter hazardous situations that must be addressed but do not present an imminent danger. Guidance may be provided verbally onsite to the Subgrantee for emergent issues. If a hazardous situation is identified, Technical staff will write a summary of the situation for BCAEO Weatherization Leadership. BCAEO may issue a letter to the Subgrantee or include a summary of the situation in the associated

monitoring report. This will depend on the details of the situation with the consideration of the Subgrantee's ability to address the hazard in a timely manner. The Subgrantee must respond with timeline of correction, results of response action, and retain this information in the client file. Technical staff will confirm the emergency situation is resolved during the monitoring engagement.

### **Overall Approach to Health and Safety Measures**

For each issue listed in the Health and Safety Plan:

- All work must meet the objective of the Michigan Weatherization Field Guide and/or the Authority Having Jurisdiction.
- Program and manufacturer approved materials and instructions must be used while installing any weatherization measures.
- When required, licensed professionals will be employed to install work and/or conduct tests. Workers must be qualified and adequately trained to implement the DOE Standard Work Specifications as well as State and local codes specific to the work being conducted (electrical, plumbing, etc.).
- Client education is only required where issues exist.
- User's manual for installed equipment will always be provided to client.
- Training to perform required testing and correctly apply work is implied.
- When a health and safety issue is cause for a deferral and the Subgrantee is unable to resolve the deferral, the client must be notified in writing within five business days, including the conditions that must be met in order for weatherization to move forward. See CSPM 609 for further details on Weatherization deferrals.
  - If the Subgrantee will use deferral reduction funding (any grant source) to address the issue and resolve the deferral, notification does not need to be provided to the client.

### **Hazard Identification and Notification**

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

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

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

### **Installation of Health and Safety Measures**

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

### **Training**

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

## Client Education

Client education is required when issues exist. For example, client education regarding drainage issues is only required where drainage problems are identified.

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

## ASHRAE Requirements

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

## 2.0 – BUDGETING

*Grantees are encouraged to budget H&S costs as a separate category and, thereby, exclude such costs from the Average Cost Per Unit (ACPU) cost limitation. This separate category also allows these costs to be isolated from energy efficiency costs in program evaluations. H&S costs that are budgeted and reported under the Program Operations category rather than the H&S category, the related H&S costs must be included in the calculation of the ACPU and cost-justified through the Grantee's Department of Energy (DOE)-approved energy audit tool.*

Select which option used below.

Separate H&S Budget

Contained in Program Operations

## 3.0 – H&S EXPENDITURE LIMITS

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

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

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

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

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

*weatherization materials.” This same section of the regulation excludes the H&S costs from the ACPU limitation if H&S costs are budgeted separately.*

*DOE recommends reviewing recent budget requests and compare those to actual H&S expenditures to see if previous budget estimates have been accurate. The resulting Total Average H&S Cost per Unit multiplied by the Grantee’s production estimate in the Annual File should correlate to the H&S budget amount listed in the Grantee’s annual plan.*

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

#### **Health and Safety Measures and Budget**

The Health and Safety Expenditure Limit is 35% of the Program Operations budget. To ensure that program services concentrate on energy efficient measures and that costs are reasonably justified, Subgrantees must maintain a Health and Safety ACPU for all completed DOE jobs.

Health and Safety ACPU will be 35% the Program ACPU, rounded up. In PY24, the H&S ACPU will be \$2,975. On a case-by-case basis BCAEO may offer a waiver for Subgrantees to exceed the DOE H&S ACPU. Additionally, Subgrantees must submit a waiver notification to BCAEO Technical staff for review if any job has H&S expenditures exceeding \$15,000 that will be charged to a single funding source. For waiver submissions, Subgrantees must email [mdhhs-bcaeo@michigan.gov](mailto:mdhhs-bcaeo@michigan.gov), Wx Manager/Specialist with a description of the requested waiver and justification supporting the request. Justification must include relevant details and how granting the waiver will assist the subgrantee in meeting the WAP program goals.

Buildings that cannot be weatherized without the H&S measures shall be deferred if the H&S measures cannot be installed. H&S measures are not considered as part of the cumulative SIR and do not need an SIR to install.

Items defined as Health and Safety measures and paid from the Health and Safety Line Item:

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

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

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

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



Measure Matrix  
Final.xlsx



## 4.0 – INCIDENTAL REPAIR MEASURES

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

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

#### **Incidental Repair Measures**

Any measure referenced in conjunction to an Energy Conservation Measure will be considered an Incidental Repair Measure. Otherwise, they will be considered a Health and Safety Measure. Incidental Repairs means those repairs necessary for the effective performance or preservation of newly installed weatherization materials (ECMs), but not part of a standard installation. Such repairs include, but are not limited to, framing or repairing windows and doors which could not otherwise be caulked or weather-stripped and providing protective materials, such as paint, used to seal materials installed under this program.

The following measures will be performed as Incidental Repair Measures (IRM) when an Energy Conservation Measure (ECM) is installed that they could be attached to as an IRM. In accordance with WPN 19-5, IRMs are measures necessary for the effective performance or preservation of installed ECMs. If the measures cannot be attached as an IRM to an ECM, the measures may be charged to Health and Safety as a standalone measure.

- Moisture Repairs
- Sealed Soil Gas/Vapor Retarder Installation
- Electrical Repairs

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

Additional guidance is in CSPM 607

## 5.0 – OCCUPANT PRE-EXISTING OR POTENTIAL HEALTH CONDITIONS AND HAZARD IDENTIFICATION AND NOTIFICATION FORM(S)

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

*Required topics are:*

- **Occupant Pre-existing or Potential Health Condition Screening**
  - *Provides documentation that allows occupant(s) to self-report known or suspected health concerns as part of initial application for weatherization, during the energy audit, or other part of the weatherization process as specified. Must minimally contain the following:*
    - Any known risks associated with the measures and materials being installed
    - Subgrantee point of contact information for occupant(s)
    - Date of screening

▪ **Hazard Identification Notification**

- Provides documentation that the occupant and landlord (if applicable), have been informed of any potential hazards identified during the energy audit or intake process. Must minimally contain the following:
  - Date(s) of the energy audit/assessment and when the occupant(s) (and landlord, if applicable) was informed of a potential H&S issue
  - A clear description of the problem, including any testing results
  - A statement indicating if, or when weatherization could continue

**Radon Informed Consent Form**

- Provides documentation that the occupant(s) (and landlord if applicable) have been informed of any potential hazards associated with radon in weatherized dwellings. The form must minimally contain the following:
  - An explanation on the potential small risk of increasing radon levels when building tightness is improved. This is based on the results of the [Buildings Assessment of Radon Reduction Interventions with Energy retrofits Expansion Study \(The BEX Study\)](#)
  - A list of precautionary measures WAP will install based on [EPA Healthy Indoor Environment Protocols](#).
  - Some of the benefits of Weatherization including energy savings, energy cost savings, improved home comfort, and increased safety.

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

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

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

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

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

The document includes a recommendation that those clients who have health conditions which may be affected by weatherization activities leave the home for a period of time during and after weatherization activities are completed. The form also contains agency contact information and suggests that clients may contact the agency with any questions.

**Location where forms have been uploaded/submitted**

Separate attachment to SF424

Separate attachment to H&S Plan

## 6.0 – HEALTH AND SAFETY CATEGORIES

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

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

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

#### Required Actions

Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>		Alternative Funds <input checked="" type="checkbox"/>

- All heating systems must first be assessed as an Energy Conservation Measure (ECM). If the measure does not meet SIR requirements as an ECM, only then can it be assessed as an H&S measure.
- Replace, repair, or install primary heating systems when existing primary heating systems are unsafe, inoperable, or nonexistent. No home may be left without a safe primary heating system after weatherization where climate conditions require heating (i.e., all climate zones except zone 1 as defined by ASHRAE). If unable to meet this requirement, deferral is required.
- No DOE-funded weatherization work is permitted if the completed dwelling unit will be heated with an unvented combustion space heater as the primary heat source. The primary heat source must be replaced with a vented unit prior to or by weatherization. The replacement unit must be sized to heat the entire dwelling unit.
- Unsafe secondary units, including space heaters, must be repaired, or removed and disposed of, or deferral is required. Secondary unvented space heaters are considered unsafe if they:
  - are not listed and labeled as meeting ANSI Z21.11.2;
  - have an input rating of more than 40,000 BTU/hour;
  - are in a bedroom and have an input rating of more than 10,000 BTU/hour;
  - are in a bathroom and have an input rating of more than 6,000 BTU/hour;
  - are operating in an unsafe manner (e.g., high carbon monoxide (CO) readings, too close to combustible materials, lack sufficient combustion air volume);
  - or are not permitted by the Authority Having Jurisdiction (AHJ).
- DOE WAP Grantees must comply with the Manufactured Home Construction and Safety Standards which mandates that:
  - All fuel-burning appliances in manufactured homes except: ranges, ovens, illuminating appliances, clothes dryers, solid fuel-burning fireplaces and solid fuel-burning stoves, must be installed to provide for the complete separation of the combustion system from the interior atmosphere of the manufactured home (i.e., to draw their combustion air from outside), and be vented to outside the dwelling.
  - All appliances installed by or left in place after weatherization in manufactured homes must meet these standards, including secondary heating sources. If an occupant will not allow the removal of an unsafe combustion appliance from the home, deferral is required.
  - Repair or replace combustion gas venting to ensure proper combustion gas venting to outside the dwelling for all combustion appliances, including but not limited to gas dryers and refrigerators, furnaces, vented space heaters, and water heaters.
- If weatherization installs an appliance that is vented into a masonry chimney, the chimney must be lined in compliance with the International Fuel Gas Code (IFGC) or local AHJ if more stringent.
- Install adequate combustion air for all combustion appliances left after weatherization.
- If permits are required for heating/cooling system work, they must be secured and are a program operation cost if the installation is an ECM or may be included in the H&S cost if installed as a H&S measure.
- If unsafe conditions relating to existing combustion appliances require remediation to safely perform weatherization and cannot be remedied by repair or tuning, replacement is an allowable H&S measure unless prevented by other guidance herein.
- Documentation justifying the replacement with a cost comparison between replacement and repair must be maintained in the client file.

**Allowable Actions**

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

- Replace, repair, or install primary air conditioning in homes where current occupants are at-risk
  - Client has a medical condition requiring temperature control as confirmed by a healthcare provider
  - Documentation from a healthcare provider would be maintained by the agency supporting that air conditioning is required for the health & safety of the clients
- Minor repairs, defined as repairs up to \$500, on electric space heaters are allowable.
- Repair or removal of primary and secondary solid fuel heating appliances.
- Replacement of unsafe primary solid fuel heating appliances.
- Room pressure relief actions are allowed H&S expense when room pressures exceed 3.0 PA as outlined in the Michigan Field Guide.

**Prohibited Actions**

Concur with DOE Guidance

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

**Required Testing/Inspection**

Concur with DOE Guidance

Alternative Guidance

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

**Grantee Combustion Testing Action Levels**

**Carbon Monoxide**

- Potential CO related health and safety concerns shall be discussed with the client. The client shall be immediately advised of any serious concerns relative to CO. If CO testing indicates a CO problem, a Hazard Identification & Notification Form shall be provided.

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

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

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

Concur with DOE Guidance

Alternative Guidance

Fireplace or woodstove venting that is left operational after weatherization must meet current local or national standards or the home must be deferred.

**Required Occupant Education**

Concur with DOE Guidance

Alternative Guidance

- Appropriate use and maintenance of units.
- Provide all paperwork and manuals for any equipment installed by weatherization.
- Discuss and provide information on proper disposal of bulk fuel tanks when not removed as part of the weatherization work.
- Where combustion equipment is present, provide combustion safety and hazards information including how to recognize depressurization, dangers of CO poisoning, and fire risks associated with combustion appliance use.
- When an unsafe condition exists, issue appropriately filled out Hazard Identification & Notification form

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

**Required Actions**

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds <input checked="" type="checkbox"/>		Alternative Funds <input checked="" type="checkbox"/>	
<ul style="list-style-type: none"> <li>When suspected friable Asbestos Containing Materials (ACM) are present, including vermiculite, assume they contain asbestos and take precautionary measures to prevent disturbing it during the audit and work unless testing determines otherwise.</li> <li>Grantees must have written policy included in their H&amp;S plan for: <ul style="list-style-type: none"> <li>Identifying and managing suspected ACM that provides for reasonable and necessary precautions to prevent asbestos contamination in the home.</li> <li>Addressing blower door testing where suspected friable ACM is present (as defined by EPA), including vermiculite.</li> </ul> </li> </ul>			
<b>Grantee ACM policy</b>			
<p>“Friable” means the material can be crumbled, pulverized, or reduced to powder by the pressure of an ordinary human hand.</p> <p>When friable Presumed Asbestos Containing Material (PACM) is identified, in the home, it must be treated as though it contains asbestos until proven otherwise. The blower door shall not be run and the Weatherization work shall not proceed until the PACM is proven to not contain asbestos, encapsulated or abated in one of the allowable ways included in this guidance or by an outside funding source.</p>			
<b>Grantee Blower Door Testing Policy When Suspected ACM Exists</b>			
<p>When friable PACM is identified, in the home, the blower door test will not be conducted to avoid disturbing friable PACM particles and the work will be deferred until all friable PACMs have either been tested and confirmed to not be ACM or safely removed and disposed of by an authorized agency. In cases where a home was deferred due to PACM and then later approached for weatherization, the client must provide documentation that the PACM was tested and confirmed to not be an ACM by a certified tester or a certified professional performed the removal or remediation of asbestos and the client must provide results of the Air Quality Testing (to ensure air quality is safe for workers).</p>			
<b>Allowable Actions</b>			
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>		Allowed with Alternative Funds <input checked="" type="checkbox"/>	
<ul style="list-style-type: none"> <li>Temporary removal and reinstallation of ACM siding to perform an ECM (e.g., wall insulation).</li> <li>Limited encapsulation, defined as costs up to \$750, or removal of suspected ACM on small surfaces (pipes, ductwork, furnaces, other small, covered surfaces, etc.) by an appropriately trained asbestos control professional if necessary to safely weatherize the dwelling as defined by the Grantee’s H&amp;S Plan.</li> </ul>			
<b>Prohibited Actions</b>			
Concur with DOE Guidance <input checked="" type="checkbox"/>			
Using DOE WAP H&S funds for general abatement/removal/or replacement of asbestos siding, thermal system insulation (TSI) or Transite, or vermiculite is prohibited.			
<b>Required Testing/Inspection</b>			
Concur with DOE Guidance <input checked="" type="checkbox"/>		Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>		Alternative Funds <input checked="" type="checkbox"/>	
<ul style="list-style-type: none"> <li>Visually inspect all surfaces (i.e., walls, floors, ceilings, roofs) for suspected ACM prior to drilling or cutting.</li> <li>Assume asbestos is present in suspect materials unless testing reveals otherwise.</li> </ul>			
<b>Allowable Testing/Inspection</b>			
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>		Allowed with Alternative Funds <input checked="" type="checkbox"/>	
<ul style="list-style-type: none"> <li>Sample collection and testing of suspected ACM conducted by an Asbestos Hazard Emergency Response Act of 1986 (AHERA) certified tester.</li> <li>Baseline indoor environmental asbestos sampling.</li> <li>Michigan follows the EPA guidelines that ACM is defined as material containing 1% or more of asbestos. <ul style="list-style-type: none"> <li>If an agency tests potential ACM and determines that it contains levels of asbestos between 0% and 1%, the staff or contractor interacting with the material must wear personal protective equipment.</li> </ul> </li> </ul>			
<b>Required Occupant Education</b>			
Concur with DOE Guidance <input checked="" type="checkbox"/>		Alternative Guidance <input type="checkbox"/>	



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

### 6.3 – Biologicals and Unsanitary Conditions

Required Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>		Alternative Funds <input checked="" type="checkbox"/>
Deferral where conditions (odors, bacteria, raw sewage, rotting wood, etc.) in the home pose a health risk to occupants and/or weatherization workers or may be worsened by weatherization activities (e.g., air sealing) and will not be resolved by weatherization.		
Allowed Actions		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>		Allowed with Alternative Funds <input checked="" type="checkbox"/>
<ul style="list-style-type: none"> <li>Limited remediation of conditions, defined as costs up to \$500, that may lead to or promote biological concerns and unsanitary conditions (e.g., repairing leaking sewage pipe).</li> <li>Limited cleaning, defined as costs up to \$500, of the workspace to protect the health and safety of workers and occupants.</li> </ul>		
Required Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>		Alternative Funds <input checked="" type="checkbox"/>
Sensory inspection of interior, exterior, attics, and subspaces of the dwelling.		
Prohibited Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
DOE WAP H&S funds may not be used for testing of materials for biological contaminants.		
Required Occupant Education		
Concur with DOE Guidance <input checked="" type="checkbox"/>		Alternative Guidance <input type="checkbox"/>
Inform occupant in writing of observed biological and unsanitary conditions.		

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

Allowable Actions		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>		Allowed with Alternative Funds <input type="checkbox"/>
<ul style="list-style-type: none"> <li>Minor repairs to building structure or roofs, defined by costs up to \$750, are allowed.</li> </ul>		
Prohibited Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
Using DOE WAP H&S funds for <i>major</i> repairs as defined by Grantee's H&S Plan. Using DOE WAP H&S funds for building rehabilitation is prohibited		
Define "major" repairs		
Repairs that cost over \$750. These are unallowable in the DOE H&S category.		
Required Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>



DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>
Visual inspection of building structure and roofing for damages that compromise building durability and to verify that portions of the home where weatherization will occur are safe for entry and performance of assessments, work, and inspections.	
<b>Allowable Testing/Inspection</b>	
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>
Diagnostics such as material moisture content, or relative humidity measurements at the audit and/or final inspection..	
<b>Prohibited Testing/Inspection</b>	
Concur with DOE Guidance <input checked="" type="checkbox"/>	
Using DOE WAP H&S funds for any testing/evaluation of structural materials by a third-party is prohibited.	
<b>Required Occupant Education</b>	
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
Notify occupant in writing of structurally compromised areas.	

<b>6.5 – Code Compliance</b>		
<b>Allowable Actions</b>		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>	
Correction of preexisting code compliance issues triggered by weatherization measures being installed in a specific room or area of the home. If the installation of a weatherization measure triggers the correction of a preexisting code compliance issue, and is paid for with WAP funds, the specific code requirements with reference to the weatherization measure(s) that triggered the code compliance issue must be documented in the occupant file.		
<b>Prohibited Actions</b>		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
<ul style="list-style-type: none"> <li>Using DOE WAP H&amp;S funds for correction of preexisting code compliance issues not directly related to the installation of specific weatherization measures in the home is prohibited.</li> <li>Using DOE WAP funds for work on condemned properties and properties where H&amp;S conditions exist that cannot be corrected under this guidance is prohibited</li> </ul>		
<b>Required Testing/Inspection</b>		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>	
Visual inspection.		
<b>Allowable Testing/Inspection</b>		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>	
If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.		
<b>Required Occupant Education</b>		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	
Inform occupant in writing of observed code compliance issues when it results in a deferral.		

<b>6.6 – Electrical</b>		
<b>Required Actions</b>		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>	
Provide sufficient over-current protection and damming prior to insulating building components containing knob and tube wiring, as required by the AHJ.		
<b>Allowable Actions</b>		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>	

- Minor electrical repairs (e.g., junction box covers, improper splices), defined as costs up to \$750, to protect the occupant or workers from electrical hazards within the living area or in the immediate area where weatherization activities will occur are allowable.
- If aluminum wiring is present, work on the home will be stopped until the suspect wiring is inspected and determined to be safe by a licensed electrician. After energy retrofit is completed, wiring will be re-inspected by a licensed electrician. Costs associated with the licensed electrician inspections, for this reason, are allowable.

**Prohibited Actions**

Concur with DOE Guidance

Using DOE WAP H&S funds for *major* electrical repairs as defined by the Grantee’s H&S plan is prohibited

**Define “major” repairs**

Electrical costs above \$750. These are unallowable in the DOE H&S category.

**Required Testing/Inspection**

Concur with DOE Guidance  Alternative Guidance  Results in Deferral/Referral

DOE WAP H&S Funds  Alternative Funds

- Visual inspection for presence and condition of knob-and-tube wiring.
- Evaluate knob-and-tube wiring for safety prior to work.
- Check for alterations that may create an electrical hazard.

**Allowable Testing/Inspection**

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

Voltage drop and voltage detection testing is allowable

**Required Occupant Education**

Concur with DOE Guidance  Alternative Guidance

- Provide occupant with written documentation of any electrical hazards identified that will not be addressed by weatherization
- Provide information to occupant on over-current protection, overloading circuits, and basic electrical safety/risks if conditions warrant.

**6.7 – Fuel Leaks**

**Required Actions**

Concur with DOE Guidance  Alternative Guidance  Results in Deferral/Referral

DOE WAP H&S Funds  Alternative Funds

- When a gas leak is found on the utility side of service, the utility service must be contacted, work must be temporarily halted, and the leak must be repaired before work may proceed.
- Fuel leaks that are the responsibility of the occupant (vs. the utility) must be repaired before installing weatherization measures in the home.

**Allowable Actions**

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

- Replacement or repair of leaking bulk fuel tanks and/or lines if connected systems will remain after weatherization.
- Replacement of flexible appliance gas connectors that are not compliant with current fuel gas codes.

**Prohibited Actions**

Concur with DOE Guidance

- Using DOE WAP H&S funds to repair leaks that are the responsibility of the utility to correct is prohibited.
- Using DOE WAP H&S funds for environmental cleanup resulting from bulk fuel leaks is prohibited

**Required Testing/Inspection**

Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>	
<ul style="list-style-type: none"> <li>Test all exposed gas lines, fittings, valves, and connections for fuel leaks from utility connection to the appliance throughout the home.</li> <li>Test all gas appliances for fuel leaks at all connections, valves, fittings, and burners.</li> <li>Conduct sensory inspection of all bulk fuels lines and storage tanks to determine if leaks exist.</li> </ul>		
<b>Allowable Testing/Inspection</b>		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>	
If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.		
<b>Prohibited Testing/Inspection</b>		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
Using DOE WAP H&S funds for environmental testing of soil or water is prohibited.		
<b>Required Occupant Education</b>		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	
Inform occupants in writing of fuel leak testing results, including specific location if fuel leaks are detected.		

## 6.8 – Gas Ovens/Stovetops/Ranges

<b>Allowable Actions</b>		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>	
<ul style="list-style-type: none"> <li>Limited cleaning or repair, defined as costs up to \$500, of ovens/ranges/stovetops are allowable.</li> </ul>		
<b>Prohibited Actions</b>		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
Using DOE WAP H&S funds for replacement of gas ovens/ranges/stovetops is prohibited.		
<b>Required Testing/Inspection</b>		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>	
<ul style="list-style-type: none"> <li>Test gas ovens for CO.</li> <li>Grantee H&amp;S plan must define action levels and resulting actions.</li> <li>Visually inspect cooking burners and ovens for operability and flame quality.</li> </ul>		
<b>Define action levels for oven CO testing and resulting actions</b>		
All work shall be deferred when the CO reading for the gas oven exceeds 225 ppm as measured after 5 minutes or any of the range top burners exceed 100 ppm as measured after 5 minutes. Alternative (LIHEAP) funds may be used to address ovens and burners with these readings.		
<b>Allowable Testing/Inspection</b>		
Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.		
<b>Required Occupant Education</b>		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	
Inform occupants of the importance of using exhaust ventilation when cooking and the importance of keeping burners and broilers clean to limit the production of CO.		

## 6.9 – Hazardous Materials

Required Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>	
<ul style="list-style-type: none"> <li>Hazardous Waste Materials generated by weatherization work (e.g., refrigerant, asbestos, lead, mercury, CFL lighting bulb/ballasts, etc.) must be disposed of according to all local and federal laws, regulations, and guidelines, as applicable. Costs specifically related to disposal may be charged as a H&amp;S expense.</li> <li>Subgrantees must document disposal requirements in contract language with the responsible party.</li> <li><b>Limited</b> removal of pollutants that pose a risk to workers is required (e.g., flammable liquids, hazardous chemicals, and other air pollutants) as defined the Grantee’s H&amp;S Plan.</li> <li>If removal cannot be performed or is not allowed by the occupant, the unit must be deferred.</li> </ul>		
Define “limited” removal of pollutants		
Defined as costs up to \$500		
Allowable Actions		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
Limited removal of pollutants, defined as costs up to \$500, that pose a risk to the occupant are allowable.		
Prohibited Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
Using DOE WAP H&S funds for Lead, Asbestos, and Radon abatement is prohibited.		
Required Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>	
Sensory inspection.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>	
Sample gas draw detection and monitoring for toxics.		
Prohibited Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
Using DOE WAP H&S funds for any testing for hazardous materials other than that specifically permitted in the asbestos, lead, and radon sections of this document is prohibited.		
Required Occupant Education		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	

- Inform occupant in writing of hazards associated with hazardous waste materials being generated/handled in the home.
- Inform occupant in writing of observed hazardous condition and associated risks.
- Provide occupant written materials on safety issues and proper disposal of household pollutants.

### 6.10 - Injury Prevention of Occupants

#### Allowable Actions

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

Minor repairs and installations, defined as costs up to \$500, (e.g., repairing stairs, replacing handrails, etc.) are allowable.

#### Prohibited Actions

Concur with DOE Guidance

Using DOE WAP H&S funds for *major* repairs, as defined by the Grantee’s H&S Plan is prohibited

#### Define “major” repairs

Repairs with costs above \$500. These are unallowable in the DOE H&S category.

#### Required Testing/Inspection

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

Visually inspect for dangers that would prevent weatherization.

#### Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.

#### Required Occupant Education

Concur with DOE Guidance

Alternative Guidance

If identified hazardous conditions will not be corrected during weatherization, inform occupant in writing of observed hazards and associated risks utilizing the “Hazard Identification Notification Form” required by WPN 22-7.

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

#### Required Actions

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

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

#### Allowable Actions

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

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

#### Prohibited Actions

Concur with DOE Guidance

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

**Allowable Testing/Inspection**

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

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

**Required Occupant Education**

Concur with DOE Guidance

Alternative Guidance

Follow pre-renovation education requirements per EPA RRP rules.

**6.12 – Mold and Moisture**

**Allowable Actions**

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

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

**Prohibited Actions**

Concur with DOE Guidance

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

**Required Testing/Inspection**

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

Visual assessment for moisture or mold damage including exterior drainage.

**Allowable Testing/Inspection**

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

- Diagnostics such as material moisture content, or relative humidity measurements at the audit and/or final inspection.

**Prohibited Testing/Inspection**

Concur with DOE Guidance

Using DOE WAP H&S funds for mold testing of any type is prohibited.

**Required Occupant Education**

Concur with DOE Guidance

Alternative Guidance

Provide occupant written notification of identified mold/moisture hazards and information regarding the associated hazard.

### 6.13 - Occupant Pre-existing or Potential Health Conditions

#### Required Actions

Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>	

- When a person’s health may be at risk and/or WAP work activities could constitute an H&S hazard, the occupant is required to take appropriate action based on severity of risk.
- Deferral, if occupant risk cannot be mitigated.

#### Allowable Actions

Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>
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- Occupant temporary relocation costs on a case-by-case basis.
- In a life-threatening emergency situation, where relocation is mandatory, the agency must follow all emergency procedure steps as defined in Section 1.0 of this Health and Safety Plan. BCAEO will assess the situation and if determined to be potentially life-threatening, approval of relocation costs will be approved, and notification sent to the agency.
- Instances could include but are not limited to, fuel leaks, CO, loss of heating system at times of unsafe weather. Hotel, meals, and transportation costs in alignment with state or agency travel policy and rates. Timeframe for duration of relocation must be approved by BCAEO on a case-by-case basis. Subgrantees must submit by email details for the case-by-case review by BCAEO which will include if the issue requires relocation, if the duration aligns with the issue, and that relocation costs are aligned with state or agency travel policy and rates.

#### Required Testing/Inspection

Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>	

- Screen occupants for known or suspected health concerns either as part of initial application for weatherization, during the audit, or both.
- This is done utilizing the “Occupant Pre-existing or Potential Health Condition Screening Form” required by WPN 22-7.

#### Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
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If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.

#### Required Occupant Education

Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
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- Inform occupant in writing of any known risks and provide pre-weatherization screening form.
- Provide occupant with Subgrantee point of contact information in writing.

### 6.14 – Pests

#### Required Actions

Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>	

Deferral of homes where infestation of pests cannot be reasonably removed or poses H&S concern for workers.

#### Allowable Actions

Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>
--	--

- Limited pest removal, defined as costs up to \$750, is allowed only where infestation would prevent weatherization.
- Screening of windows and points of access and incorporating pest exclusion into air sealing practices to prevent intrusion.

**Allowable Testing/Inspection**

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

Sensory inspection of presence and degree of infestation and risk to worker.

**Required Occupant Education**

Concur with DOE Guidance

Alternative Guidance

Inform occupant in writing of observed conditions and associated risks.

**6.15 – Radon**

**Required Actions**

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

- Cover exposed dirt floors within the pressure/thermal boundary with a sealed soil gas retarder
- Cover sump well/pits with airtight covers
- Implement ventilation as required by ASHRAE 62.2-2016

**Allowable Actions**

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

- In homes where radon may be present, work scope may include additional precautionary measures based on EPA Healthy Indoor Environment Protocols for Home Energy Upgrades.

**Prohibited Actions**

Concur with DOE Guidance

Using DOE WAP H&S funds for radon mitigation is prohibited.

**Allowable Testing/Inspection**

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

Limited radon testing, defined as costs under \$500, is allowable.

**Required Occupant Education**

Concur with DOE Guidance

Alternative Guidance

- Provide all occupants EPA's A Citizen's Guide to Radon and inform them of radon related risks.
- Occupants must sign an informed consent form prior to receiving weatherization services.

**6.16 – Safety Devices: Smoke and Carbon Monoxide Alarms, Fire Extinguishers**

**Required Actions**

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

Install CO alarms in every home where alarms are not present or are inoperable in compliance with ASHRAE 62.2-2016 which references NFPA 720 (note: NFPA 720 has been incorporated into NFPA 72).

**Allowable Actions**



Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>		Allowed with Alternative Funds <input checked="" type="checkbox"/>	
<ul style="list-style-type: none"> <li>• Install smoke alarms where the AHJ requires them if alarms are not present or are inoperable.</li> <li>• Replace functional smoke alarms and carbon monoxide alarms if they are beyond the manufacturer’s stated lifetime (usually 10 years).</li> <li>• Replace functional smoke or CO alarms batteries if designed to be replaceable.</li> <li>• Provide fire extinguishers where solid fuel burning equipment is present.</li> </ul>			
<b>Prohibited Actions</b>			
Concur with DOE Guidance <input checked="" type="checkbox"/>			
Using DOE WAP H&S funds for replacement of functional smoke or CO alarms that are not beyond the manufacturer’s stated lifetime is prohibited.			
<b>Required Testing/Inspection</b>			
Concur with DOE Guidance <input checked="" type="checkbox"/>		Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>		Alternative Funds <input checked="" type="checkbox"/>	
Verify operation and age of installed alarms.			
<b>Allowable Testing/Inspection</b>			
Allowed with DOE WAP H&S Funds <input type="checkbox"/>		Allowed with Alternative Funds <input type="checkbox"/>	
If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.			
<b>Required Occupant Education</b>			
Concur with DOE Guidance <input checked="" type="checkbox"/>		Alternative Guidance <input type="checkbox"/>	
Provide occupant with verbal and written information on use of newly installed devices and the potential risks of not properly maintaining these devices.			

<b>6.17 – Ventilation and Indoor Air Quality</b>			
<b>Required Actions</b>			
Concur with DOE Guidance <input checked="" type="checkbox"/>		Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>		Alternative Funds <input type="checkbox"/>	
Install ventilation as required by ASHRAE 62.2 - 2016. If occupant refuses ventilation as required by ASHRAE 62.2, the home must be deferred.			
<b>Allowable Actions</b>			
Allowed with DOE WAP H&S Funds <input type="checkbox"/>		Allowed with Alternative Funds <input type="checkbox"/>	
If DOE WAP H&S Funds are used for any “allowable” actions, detail them here.			
<b>Required Testing/Inspection</b>			
Concur with DOE Guidance <input checked="" type="checkbox"/>		Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>		Alternative Funds <input checked="" type="checkbox"/>	
<ul style="list-style-type: none"> <li>• ASHRAE 62.2 evaluation to determine required post-weatherization ventilation.</li> <li>• Measure fan flow of existing fans and of installed equipment to verify performance.</li> </ul>			
<b>Allowable Testing/Inspection</b>			
Allowed with DOE WAP H&S Funds <input type="checkbox"/>		Allowed with Alternative Funds <input type="checkbox"/>	
Use of anemometer is allowed if method for arriving at measurement use for ASHRAE compliance is included..			
<b>Required Occupant Education</b>			
Concur with DOE Guidance <input checked="" type="checkbox"/>		Alternative Guidance <input type="checkbox"/>	
<ul style="list-style-type: none"> <li>• Provide occupant with information on function, use, and maintenance (including location of service switch and cleaning instructions) of ventilation system and components.</li> <li>• Provide occupant with equipment manuals for installed equipment.</li> <li>• Include disclaimer that ASHRAE 62.2 does not account for high polluting sources or guarantee indoor air quality.</li> </ul>			

## 6.18 – Water Heaters

*(see Combustion Appliances for combustion related requirements)*

### Allowable Actions

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

- All heating systems must first be assessed as an Energy Conservation Measure (ECM). If the measure does not meet SIR requirements as an ECM, only then can it be assessed as an H&S measure.
- Minor safety repairs of existing water heaters, up to \$500, (e.g., T&P valve piping, backflow prevention devices, expansion tanks) as defined by the Grantee’s H&S plan.
- Replace, repair, or install primary water heaters when existing primary water heater is unsafe, inoperable, or nonexistent.
  - Examples of this include, but are not limited to, if the water heater fails CAZ testing, if combustion air is inadequate and cannot be introduced effectively, leaking primary tank, high CO measurements.
  - If pre-weatherization CAZ testing and target air sealing numbers indicate the water heater will fail future worst case CAZ testing, replacement is warranted.

### Required Testing/Inspection

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

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

### Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

Temperature settings testing is allowable.

### Required Occupant Education

Concur with DOE Guidance

Alternative Guidance

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

## 6.19 – Worker Safety

### Required Actions

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

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

### Allowable Actions

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

- Minor repairs and installations, up to \$500, (e.g., repairing stairs, replacing handrails, etc.) as defined by the Grantee’s H&S Plan, are allowable when necessary to safely weatherize the dwelling.
- Equipment purchases to protect the health and safety of the worker (e.g., Personal Protective Equipment (PPE), jobsite cleaning supplies)

### Prohibited Actions

Concur with DOE Guidance

Using DOE WAP H&S funds for *major* repairs as defined by the Grantee’s H&S Plan is prohibited.

### Define “major” repairs

Any costs over \$500.

### Allowable Testing

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

- Environmental and surveillance testing required by OSHA regulation

## 6.X – (Insert Additional H&S Items for Use of DOE WAP H&S funds)

### Required Actions

Concur with DOE Guidance <input type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input type="checkbox"/>		Alternative Funds <input type="checkbox"/>

Insert required item text

### Allowable Actions

Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
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If DOE WAP H&S Funds are used for any “allowable” actions, detail them here.

### Prohibited Actions

Concur with DOE Guidance

What is prohibited

### Required Testing/Inspection

Concur with DOE Guidance <input type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input type="checkbox"/>		Alternative Funds <input type="checkbox"/>

Insert required item text

### Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
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If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.

### Prohibited Testing/Inspection

Concur with DOE Guidance

What is prohibited

### Required Occupant Education

Concur with DOE Guidance <input type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
---	---

Insert required item text

# TRAINING AND TECHNICAL ASSISTANCE (T&TA) PLAN TEMPLATE

## 1.0 – GENERAL INFORMATION

COMMENTS THAT DO NOT GENERALLY FIT INTO THE AVAILABLE TABLES BELOW

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

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

### Comprehensive Training Plan

Per CSPM 603, the Subgrantee is required to have all staff and contractors complete weatherization work in compliance with the Standard Work Specifications (SWS) outlined in the Michigan Weatherization Field Guide, the Energy Auditor Guide, and the Community Services Policy Manual (CSPM). All contracts must have this language included. This includes complying with WPN 22-4, and DOE’s Comprehensive Training requirements.

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

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

MDHHS-BCAEO participates in the following:

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

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

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

- Active involvement with Policy Advisory Council in Michigan
- Regular Weatherization Manager Updates
- Weatherization meetings for Executive Directors (as needed)
- Scheduling statewide weatherization meetings
- Supporting program management training
- Updates to program management guidance
- Updates/revisions and implementation of the CSPM Policies and Procedures Manual
- Continued meeting of the working group consisting of MDHHS-BCAEO Weatherization Staff, to develop new training approaches and refine the existing courses to best meet the needs of the network
- Encouragement of information exchange and skills transfer among subgrantees on an informal basis
- Various Training and Technical Assistance for Weatherization managers, staff and contractors

#### **Training, Certification, Licensing, and Insurance Policy**

Please see the attachment to the SF424 called “618 DRAFT Technical Weatherization Certification and Training Requirements”. This document spells out all requirements for training, certification, licensing, and insurance in Michigan. The structure of this policy did not allow it to easily be copied and pasted directly into this template, but we are attaching it to the state plan as this is the policy presented to our subgrantees and that our monitors use to review.

#### **Contractor Stipends for Training**

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

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

BCAEO has a set amount allocated annually for contractor stipends. For that reason, eligible contractor stipends will be paid on a first come, first serve basis.

#### **Individuals to be compensated**

Any contractor company working in the Michigan WAP may receive a training stipend through DOE T&TA funds from BCAEO for allowable trainings if their employee(s) work in one of the four JTAs (RIT, CL, EA or QCI). In order to receive a training stipend, the company must first have a retention agreement in place with at least one Michigan WAP Grantee and/or BCAEO. Individuals that are employed at any WAP agency are not eligible to receive a contractor’s stipend, regardless of their contractor status at other agencies. They may, however, be paid their salary out of T&TA from their agency of employment for the time they spend in training.

**Periods of compensation**

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

**Travel**

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

**Approved activities eligible for compensation**

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

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

Activities must be attended in full for compensation to occur.

Agencies may opt to cover registration fees or application costs for OSHA 10, and LRRP (Firm). BCAEO Contractor stipends may cover the time spent taking training.

**Pay rates by JTA**

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

Retrofit Installer/Crew Leader: \$215 full day/\$100 half day

EA/QCI: \$231 full day/\$108 half day

**Payments**

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

Contractor companies must submit requests for reimbursement through the following link:

<https://www.surveymonkey.com/r/MiStipendRequest>. Requests must be submitted to BCAEO within 60 days of the activity or no later than July 30 for costs from the previous program year. BCAEO may reject any cost submission not deemed appropriate or allowable. Any questions on the submission process may be submitted to [MDHHS-BCAEO@michigan.gov](mailto:MDHHS-BCAEO@michigan.gov).

Submissions must include\*:

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

- Agency/agencies of affiliation
- Certificate/Documentation of completion if not completed with MiTEC

\*Please note that a W-9 must be completed with MPHI (see Payments section) and a retention agreement with a WAP agency must be on file with BCAEO (see Retention Agreement section) before a payment can be made.

**Retention Agreement**

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

**2.0 – OVERALL T&TA PLAN**

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

**FEEDBACK FROM INTERNAL AND EXTERNAL REVIEWS, EXAMPLES INCLUDE:**

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

**Training and Technical Assistance Assessment:**

MDHHS-BCAEO staff analyzes financial, production, and weatherization retrofit information on a monthly and quarterly basis. Trends indicating an inability to meet goals such as in production and/or completed weatherization measures will be documented and tracked for appropriate follow up. The monitoring reports are shared with the MiTEC so trainings can be modified or customized based on needs. Onsite visits provide observable evidence for the next level of training and technical assistance needed to improve performance and quality of work. MiTEC Instructors may attend monitoring with BCAEO staff when possible. It has long been understood that monitoring informs training. Expansion will increase the amount of monitoring, which in turn will increase the demand for up-to-date training to meet the needs of the network and address concerns quickly. By responding promptly to training needs, BCAEO and MiTEC are working to ensure compliance and reduce the frequency of deficiencies.

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



## Feedback Summary that influenced the PY 2024 Training Plan:

### American Customer Satisfaction Index Survey Results:

- MDHHS-BCAEO has dedicated time and effort to improve performance in the category of Training Provided by Third Parties. When this survey was conducted, MDHHS-BCAEO was in the early stages in planning to develop a Weatherization Training Center. As of July 14, 2020, MDHHS-BCAEO has established an IREC accredited training center. In PY24, MiTEC will continue to hold a robust training program to ensure weatherization professionals are able to apply the building science around weatherization. MiTEC has worked to establish training sites in key locations in the state. Additionally, MiTEC is also working towards improving access to training by holding training classes throughout the state as needed and coordinated with Subgrantees. This will reduce costs for agencies and contractors. The comments below that helped MDHHS-BCAEO establish a mobile training.
  - “Out of state is often expensive and hard to get.”
  - “More locations throughout the state”
  - “Have more options in trainers at facilities that may be closer to our state.”
  - “Easier access to training’s, and more choices on when available”
- The following comment is helpful for MDHHS-BCAEO to build consistency in the program. The field guide update and the new energy auditor manual was completed in PY20 with a consistency lens. Additionally, BCAEO technical monitoring team and MiTEC instructors meet regularly to discuss weatherization topics to align messaging.
  - “During conferences and technical monitoring, that a consistent message is being relayed to the sub-grantees. There have been some staff turnover recently, and the message isn't always consistent from one technical staff person to the next. If we are to follow the state plan and the SWS with the Field Guide as working tools, then everyone should be getting the same clear message from the state down to the contractors.”
  - “Have one common set of regulations and apply them consistently.”

### Direct Feedback from Subgrantees:

- After the change in MiTEC leadership during PY22, the MDHHS-BCAEO Weatherization team held one on one meetings with all WAP Subgrantees to assess where MiTEC could strengthen its approach.
- Noted areas for improvement:
  - Ensure technical gap with Deputy Director leaving is replaced;
  - Hire more Shell instructors;
  - Hire more Energy Auditor instructors;
  - Create a strong Weatherization Management training program;
  - Provide more basic classes and other classes (mechanical, 3D modeling, FACSPRO, Work Orders...);
  - Build a workforce development program and pipeline to weatherization;
  - Need online classes, videos, and guides;
  - Convert some classes to TEAM or virtual meetings to reduce travel;
  - Do not cancel classes;
  - Offer classes in multiple locations;
  - Improve communication on the onsite class component;
  - Build a Weatherization Management portal to manage training requirements and certification – especially when weatherization agencies share contractors;
  - Increase the class sizes;
  - Provide direct mentorship assistance at homes;
  - Help prepare students to take the BPI certification tests;
  - Take the classes and build 2-week (or as many as needed) courses – this will help to ensure the students have all the requirements when they return to the agency; and

- Make sure we pay contractor stipend quickly

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

**Michigan WAP Network Expansion Planning:**

The MDHHS-BCAEO is actively working with Michigan’s WAP Network on workforce development and expansion. In PY21, MDHHS-BCAEO built and rolled out a performance based module framework for the Retrofit Installer Technician JTA as an option to fulfill comprehensive training requirements. MDHHS-BCAEO has also collaborated with other statewide stakeholders to better understand contractors’ perspective on the WAP through a contractor survey. The survey was conducted in PY21 and received over 100 responses from internal and external contractors to our WAP. MDHHS-BCAEO has four Weatherization Coordinators who have pursued technical competencies in order to become Quality Control Inspectors for the expanded program and one additional Weatherization Coordinator is achieving this certification. Additionally, MDHHS-BCAEO is expanding the team with additional Weatherization Coordinators to train to be MiTEC Instructors or Quality Control Inspectors.

MDHHS-BCAEO has also begun the framework of a marketing campaign targeting the following groups: General public and potential contractors. As of spring 2023, the YouTube video footage has been shot and the marketing campaign has been designed. Additionally, a marketing campaign was run from July 2023-October 2023 consisting of digital adds through social media and other web based venues. This campaign resulted in 15,150,523 impressions. MDHHS-BCAEO is considering similar campaigns in PY24. MDHHS-BCAEO will encourage all Subgrantees and partners to promote all marketing campaign and YouTube videos designed for the statewide program. MDHHS-BCAEO added a statewide multifamily Subgrantee to its BIL program in the spring of 2023. MDHHS-BCAEO is considering adding additional Subgrantees in areas of the state that have been recently underserved. MDHHS-BCAEO will follow all DOE and CFR regulations for adding Subgrantees to each grant when the time comes. MDHHS-BCAEO has convened a Strategic Vision Workgroup for advanced WAP managers to participate in and advise on the direction of the program in the state.

**Retrofit Installer Training to Hire Cohort**

Due to the need for program expansion, as well as the identified contractor shortage in the Michigan energy efficiency field, MDHHS has been seeking innovative solutions. One solution considered is utilize T&TA funds to recruit and train staff that will apply with one of the subgrantees or retained WAP contractors for hire when the training is complete. The training portion would qualify as Comprehensive for the RIT JTA. Cohorts are anticipated to target six (6) people. The people being trained would have the expectation of working in the Weatherization Assistance Program once the training is completed, and upon successful hire by one of the subgrantees or retained WAP contractors.

If the applicants are hired, part of the expense would increase the amount of Comprehensive training provided for the WAP network. The planned format of the cohort is below:

- Subgrantees or MiTEC identify individuals to participate in a cohort
- MiTEC trains people as RITs
  - Students are informed of the process and agree to apply with the hiring subgrantee or retained contractor after successful completion of the training.
  - Planned for five weeks of in person training with MiTEC, followed by a sixth week of orientation and training with the hiring entity
    - The training would include:
      - Multiple RIT Comprehensive training courses, the IREC ones approved for MiTEC are:
        - Weatherization 101
        - Advanced Air Sealing

- Dense Pack Insulation
- Foundation Insulation
- Mobile Home Weatherization
- Hands on field work in conjunction with trainers
- Orientation at the sponsoring subgrantee for grantee specific training
  - At the end of the six week period, the agency/retained contractor would make the determination if the student is an appropriate fit.
- The students would be paid a stipend during the training process and there are no anticipated gaps in pay from day one of training until successful hire.
- If hired, the sponsoring subgrantee continues with their standard training and work protocols for the student who is now considered agency staff.
- If applicants find they are not interested in working in Weatherization, there would be an agreement that is signed prior to commencement that asks the applicant to provide feedback to MiTEC stating the reasons. The applicants will be encouraged to communicate with MiTEC during the training process and after hire about the process.

Upon successful completion of and interest in this pilot program, MDHHS-BCAEO intends to expand this model for other JTAs.

### **Retrofit Installer Training Pilot**

In PY23/24 MiTEC is working on a pilot with Youthwork in conjunction with a Subgrantee (NMCAA). YouthWork is an AmeriCorps program designed to strengthen young people and their communities by completing conservation and skilled trades projects for nonprofits and government agencies. As a mission-driven program, YouthWork proudly accepts and deliberately recruits participants from varying backgrounds, with varying talents and capabilities, especially targeting young adults who face barriers to employment, women, and members of the BIPOC, LGBTQ+, and disability communities. NMCAA has fostered a relationship with YouthWork, and the individuals trained will complete weatherization work in the program. YouthWork has several year-round paid employees that will follow the Crew Lead JTA training path, and the youth that they bring on will follow the Retrofit Installer JTA training path. BCAEO sees this as an opportunity to engage the youth participating in the program and get them excited about Weatherization, making introductions to our shell contractor companies to hopefully gain full-time employment after their term in YouthWork is completed.

### **Energy Auditor Training to Hire Cohort**

In PY22, MDHHS-BCAEO piloted two Energy Auditor Training to Hire Cohorts. The first pilot was held in conjunction with Wayne Metro Community Action Agency and trained 3 individuals to prepare for the SOM & BPI Energy Auditor tests. The second pilot was held in conjunction with Oakland Livingston Human Services Agency and trained 6 individuals to prepare for the SOM & BPI Energy Auditor Tests. In the 10-week training cohort, participants completed comprehensive training with MiTEC, instruction from BCAEO staff, and shadowed Energy Auditors onsite. The cohort allowed multiple Auditors in training from an agency learn in a group environment. At the conclusion of the cohorts, all participants tested and received their State of Michigan Energy Auditor Certification. Following the cohorts, MiTEC has provided additional instruction and guidance to candidates as they begin auditing. The sample cohort schedules are attached to the SF-424 and vary depending on each agency's capacity and staffing model. This model may be replicated in the future.

If there are not enough candidates in a single location for a full cohort, MiTEC will work with the candidates individually to develop a training plan, provide input on identifying an agency mentor, and support the future auditor as they work towards certification. This support may involve review sessions of audits completed.

### **Energy Auditor Intermediate Training**

In PY23, MDHHS-BCAEO piloted an Energy Auditor Intermediate Training that included 4 students preparing for BPI certification. This training targets Energy Auditors who have their State of Michigan Certification and will

be challenging the BPI EA tests. The training is focused on helping students successfully pass the BPI Energy Auditor written/online test. The BPI written test is proctored on the last day of class. Prior to the class, MiTEC instructors worked with the students to walk through audits and also provided a two hour math prep virtual training.

### **Interest Survey**

MDHHS-BCAEO has created an interest survey available on the website as well as at any resource fairs and through partners. When people submit the interest survey form, they become looped in with MDHHS-MiTEC staff about next steps and possibilities for them to connect with the Subgrantee network in Michigan.

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

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

Benefits of the program will include:

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

### **EXISTING OR PLANNED ACCREDITED TRAINING CENTER PARTNERSHIP OR WORKING RELATIONSHIP.**

#### **Michigan Training and Education Center (MiTEC)**

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

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

#### **IREC Accreditation**

MiTEC received IREC accreditation July 14, 2020. The IREC accreditation covers the Energy Auditor, Crew Leader, and Quality Control Inspector Job Task Analysis (JTA). Achieving the IREC accreditation allows MiTEC

to provide Michigan's Weatherization Network with all required DOE Comprehensive and Specific training.

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

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

#### EA/QCI JTAs

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

#### RIT/CL JTAs

- Crew Leader
- Advanced Air Sealing
- Dense Pack Insulation
- Mobile Home Weatherization
- Foundation Insulation
- Weatherization 101

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

MiTEC is currently staffed with the following positions:

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

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

MiTEC staff either participate in or have knowledge of annual risk assessments, monitoring results, corrective actions, follow-up training activities, policy updates, state plan preparation, data gathered from subgrantee application documents and technical assistance that is managed by the MDHHS-BCAEO. Information from these activities is the basis for annual curriculum development, course work enhancements, class scheduling, and new classes. The active collaboration and communication between the MiTEC instructors, Student Services, and Technical Monitors allows MiTEC to integrate and emphasize components into training.

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

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

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

The training board composition as of this application is listed below.

Heidi Johnson, Washtenaw Weatherization Manager  
Roger Strickfaden, Kent County Weatherization Manager  
Johnny Mills, Mid-Michigan Weatherization Manager  
John Carmody, Wayne Metro Interim Weatherization Manager  
Paul Janczak, Gogebic-Ontonagon Weatherization Manager  
Brian Treanor, Weatherization Contractor  
Mark Whitscell, Weatherization Contractor  
Steve Schuster, MiTEC Technical Weatherization Manager  
September Ward, MiTEC Registrar  
Maddy Kamalay, BCAEO Weatherization Manager  
Kris Schoenow, BCAEO Executive Director

**Training and Technical Assistance Resources for MiTEC:**

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

Training and Technical Assistance funds also support local subgrantees to initiate training and to make effective use of MiTEC. To ensure coordination of training activities, all Training and Technical Assistance funds are planned and budgeted.

**Training and Technical Assistance Funding can cover:**

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

**Training Schedule:**

The training schedule is made available to the network on the MiTEC website through the website link at <https://www.michigantec.org>. MiTEC staff participates in MDHHS-BCAEO Weatherization meetings to update technical standards and update training curriculum. Courses in building science, retrofit energy efficiency measures, CAZ, mechanical inspection/repair, ASHRAE, air sealing, insulation, mold/moisture, asbestos, and lead safety are provided with health and safety training integrated into classes.

**Instructors:**

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

**Certification and CEUs:**

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

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

**Training Material:**

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

**Attendance and Requirements:**

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



**PREPARATIONS FOR FUTURE/UPCOMING PROGRAM REQUIREMENTS, EXAMPLES INCLUDE:**

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

**Weatherization Field Guide and 2020 SWS**

Michigan’s Weatherization field guide was approved by DOE in 2021 and aligns with the 2020 SWS items. The updated field guide was a template from Saturn with many edits from Michigan’s technical staff for our state specific program. SWS and Field Guide Navigation was added in PY23 as a MiTEC training. More details on the SWS and Field Guide Navigation class is located in the Specific Training section.

**Migration to Online Weatherization Assistant**

Full NEAT and MHEA (WAweb) transition will be completed by July 1, 2024.

MiTEC is responsible for delivering training to prepare Michigan’s WAP for the transition to WAweb. All MiTEC instructors will be trained in WAweb as training becomes available and information is released by DOE and ORNL. MDHHS-BCAEO and MiTEC staff have participated in all trainings related to WAweb conversion by ORNL. Initial training will be available March-June 2024. MDHHS-BCAEO and MiTEC will use these trainings to train staff throughout the state. Initial trainings are virtual recorded training, and future MiTEC training will be offered virtually and in-person.



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

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

**Quality Control Inspectors (QCI)**

QCIs working for, or contracted by, the WAP must possess certification and the knowledge, skills, and abilities in the NREL Job Task Analysis for QCIs. This applies to all individuals who perform an evaluation and sign off on work performed in homes. The QCI has no involvement in the prior work on the home, either as the auditor or as a member of the crew. (See Waiver Exception for same EA/QCI in CSPM 603) All QCIs performing final inspections must have a BPI accredited Quality Control Inspector Certification.

Individuals that hold the BPI QCI certification are eligible to complete quality control inspections on single family units. Individuals that hold the BPI QCI certification are eligible to complete quality control inspections in multifamily buildings (5+ units and shelters) if they successfully complete a comprehensive training program based on the NREL Multifamily Quality Control Inspector JTA. Comprehensive training must be renewed every 3 years for individuals working in this JTA.

QCIs can be employed by third party organizations or subgrantees; however, the subgrantee is ultimately responsible for ensuring that every completed unit reported meets the quality guidelines required by the Weatherization Assistance Program. The subgrantee must provide in their subgrantee plan a policy for validation of the QCI credentials.

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

**Energy Auditors**

The Energy Auditor must possess the knowledge, skills and abilities in the National Renewable Energy Laboratory (NREL) Job Task Analysis for Energy Auditor. If a candidate holds the BPI Energy Auditor certification, they may perform energy audits. It is the Subgrantee's responsibility to ensure the Energy Auditor can perform all tasks related to the WAP including client education, WAweb, statewide database, audit documentation requirements, and ensuring performance and skills meet the requirements of the WAP.

BCAEO allows for individuals who have obtained the SOM EA certification to perform audits in this role for 18 months while working to obtain the experience needed to obtain the BPI EA certification. After 18 months, the individual must successfully obtain the BPI EA certification to continue working in the EA JTA in Michigan. On a case-by-case basis, a candidate experiencing challenges passing the BPI written exam (multiple unsuccessful attempts), but who has demonstrated the capabilities to run a successful audit may apply for an extension for the SOM EA certification. This will be approved with an appropriate training plan and testing schedule and coordination with MiTEC to assist the candidate in achieving the BPI EA certification.

All Energy Auditor candidates must be sponsored by one of the Subgrantee agencies in the Michigan WAP network. The sponsoring Subgrantee will be responsible for the field training necessary to prepare candidates sufficiently for other required training and testing. The individual must also successfully complete the Energy Auditor Comprehensive training course through MiTEC before obtaining either the SOM or BPI EA certification. After an individual successfully obtains either EA certification, they must submit their first energy audit(s) post certification to MDHHS-BCAEO for review. Certified staff will review audit submissions with candidates until approved. At that point, Energy Auditors can proceed with independent audits. Additional training will be provided to Energy Auditors as needed based on the first 3 independently completed audits. Comprehensive training must be renewed every 3 years for individuals working in this JTA.

**Crew Leader (Single Family)**

A Crew Leader is responsible for supervising the retrofitting activities specified in the scope of work. They are responsible for interacting with the client plus managing personnel and materials on the job site in a safe and effective manner. The Crew Leader is responsible for quality control, testing procedures, documentation, and conducting a final walk through to ensure that all work is completed in a satisfactory manner. It is the subgrantees responsibility to ensure that all untrained staff must not be left without supervision in the field during weatherization. Crew leaders must participate in a Comprehensive training for the RIT JTA or the Performance Based Modules and the Crew Leader Comprehensive training to meet comprehensive training requirements. Comprehensive training must be renewed every 3 years for individuals working in this JTA.

**Retrofit Installer (Single Family)**

A Retrofit Installer/Technician installs energy-efficiency measures to single family or 2-4 unit-homes using a variety of building science best practices to improve, safety, comfort, durability, indoor air quality, and energy efficiency. Knowledge, skills, and abilities for a retrofit installer are contained in the Crew Leader JTA, "Domain 3: Implement Scope of Work". It is the subgrantees responsibility to ensure that all untrained staff must not be left without supervision in the field during weatherization. Comprehensive training must be renewed every 3 years for individuals working in this JTA. RITs may meet the performance based modules (PBMs) requirement as an alternative to the comprehensive training requirement. Individuals who use this option must meet all PBMs within the first year of working in the RIT role. They must renew this training by attending a conference session at the Michigan conference every 2 years.

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

Training & Certification	Type	Retrofit Installer	Crew Leader	Energy Auditor	QCI	Notes
Crew Leader	Comprehensive Training		Required			MiTEC accredited course
Energy Auditor	Comprehensive Training			Required		MiTEC accredited course
Quality Control Inspector	Comprehensive Training				Required	MiTEC accredited course
State of Michigan Energy Auditor Certification	Required Certification (if not immediately obtaining			Required		SOM Energy Auditor Certification valid for an 18-month grace period prior to obtaining BPI Energy Auditor (individuals may also opt to

	BPI)					immediately obtain BPI EA and skip this step) Certification
BPI HEP Energy Auditor Certification	Required Certification			Required		Required either immediately or after 18 months of an individual holding the SOM EA certification to perform energy audits
BPI Quality Control Inspector Certification	Required Certification			Required	Required	
EPA's Lead Renovation, Repair, and Painting Certification/EPA Firm License	Required Certification					See CSPM 618 – Firm requirement for every entity performing work that may disturb lead
Weatherization 101	Comprehensive Training	x	x			MiTEC Course – any course with “x” may meet Comprehensive Training requirement for JTA
Advanced Air Sealing	Comprehensive Training	x	x			MiTEC Course – any course with “x” may meet Comprehensive Training requirement for JTA
Dense Pack Insulation	Comprehensive Training	x	x			MiTEC Course – any course with “x” may meet Comprehensive Training requirement for JTA
Foundation Insulation	Comprehensive Training	x	x			MiTEC Course – any course with “x” may meet Comprehensive Training requirement for JTA
Mobile Home Weatherization	Comprehensive Training	x	x			MiTEC Course – any course with “x” may meet Comprehensive Training requirement for JTA
ASHRAE 62.2 Standards	Comprehensive Training			x	x	MiTEC Course – any course with “x” may meet Comprehensive Training requirement for JTA
CAZ Pressure Diagnostics	Comprehensive Training			x	x	MiTEC Course – any course with “x” may meet Comprehensive Training requirement for JTA
Mechanical Systems Inspection for Auditors (MSIA)	Comprehensive Training			x	x	MiTEC Course – any course with “x” may meet Comprehensive Training requirement for JTA
NEAT/MHEA Setup	Comprehensive Training			x	x	MiTEC Course – any course with “x” may meet Comprehensive Training

						requirement for JTA
NEAT/MHEA Data Entry	Comprehensive Training			x	x	MiTEC Course – any course with “x” may meet Comprehensive Training requirement for JTA
Venting & Combustion Air	Comprehensive Training			x	x	MiTEC Course – any course with “x” may meet Comprehensive Training requirement for JTA
Zone Pressure Diagnostics	Comprehensive Training			x	x	MiTEC Course – any course with “x” may meet Comprehensive Training requirement for JTA
Lead Safe Work Practices (LSW)	Specific Training	Required	Required	Required	Required	LRRP may substitute for this training for an individual. Must be taken within 180 days of beginning work in JTA.
Health and Safety Training	Specific Training	Required	Required	Required	Required	MiTEC Course Includes health and safety training and indoor air quality/mold (formally known as IAQ). Must be taken within 180 days of beginning work in JTA.
OSHA 10 Hour	Specific Training	Required	Required	Required	Required	Online Training OSHA 30 may substitute for this training requirement for an individual. Must be taken within 180 days of beginning work in JTA.

**PARTNERSHIPS WITH THE STATEWIDE HOME PERFORMANCE INDUSTRY ON TRAINING ISSUES; IF APPLICABLE.**

**Michigan Home Energy Rebates Coordination Meetings**

This is a cross departmental group in Michigan State government with representation from EGLE (energy and environment), MSHDA (housing), MPSC (regulatory authority), the Governor’s office and MDHHS. The group has been an effort to understand how rebates currently work in the state and what opportunities exist for future funding opportunities through IRA and IIJA programs. Outside guest speakers from national groups and Michigan utilities attend the meetings.

Additionally, the MDHHS-BCAEO Grantee team has coordinated meetings with EGLE and Michigan Subgrantee network for the development and implementation of the MI Home Energy Rebate Program. Complete program design and rollout is anticipated to begin in fall 2024.

**Energy and Climate Infrastructure Planning Meetings**

Every other week this cross departmental group meets with representation from EGLE (energy and environment), MSHDA (housing), MPSC (regulatory authority), the Governor’s office, MEDC (economic development), LEO (labor) and MDHHS. This group focuses on educating the entire group on what grant opportunities are being pursued in the state so duplicative/competing efforts do not occur and instead departments can collaborate on projects.

**SHPO Partnership**

MDHHS-BCAEO and the SHPO have worked closely in recent years to better understand each other's processes and refine efficiencies. Representatives from the SHPO office presented at the Michigan Technical conference in 2022 and are anticipated to present in 2024. BCAEO and the SHPO office have regular calls in anticipation of the PA. Additionally, BCAEO will collaborate with the SHPO office for any additional training requests.

**Michigan's Energy Waste Reduction Low Income Workgroup (EWR LI WG)**

EWR, created under Public Act 295 of 2008, as amended by Public Act 342 of 2016), also known as the clean and renewable energy and energy waste reduction act, requires all-natural gas and electric utility providers in the state to implement programs for their customers to reduce overall energy usage by specified targets, in order to reduce the future cost of service to utility customers.

Training: Weatherization, energy efficiency, and technical measures.

**Michigan Energy Efficiency Contractor Collaborative**

This unofficial group of cross industry stakeholders has been meeting since late 2021 in order to better understand the disconnect between existing contractors and bidding on WAP work. The group includes individuals internal and external to the Michigan WAP, but all stakeholders are involved in the energy efficiency contractor space in Michigan. So far the Collaborative has facilitated a detailed survey on the contractor network's perspective of the WAP to increase our understanding of barriers to expanding with existing contractors.

**Michigan Climate and Health Adaptation Program (MICHAP)**

The Michigan Department of Health and Human Services Division of Environmental Health established the MICHAP. MICHAP is charged with protecting the health of Michigan's citizens from threats related to climate change, with support and guidance of the Centers of Disease Control & Prevention's – Climate Ready States & Cities Initiatives. MDHHS-BCAEO and MICHAP are currently partnering on an assessment of Medicaid related medical visits pre- and post- Weatherization work to better understand the Michigan WAP's effect on these types of medical visits.

Training: Weatherization and health.

**Low-Income Home Energy Assistance Program (LIHEAP)**

The Michigan Department of Health and Human Services, as the designated lead agency responsible for the administration of these federal funds. The components of Michigan's energy assistance effort and the responsible agency for each are as follows:

- Home Heating Credit: Department of Treasury
- Crisis Intervention: MDHHS
- Weatherization Assistance Program: MDHHS

Training: Weatherization, energy efficiency, technical measures, and client education.

**Michigan Energy Assistance Program (MEAP)**

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

- Paying their bills on time;
- Budgeting for and contributing to their ability to provide energy expenses, which may include

- enrollment into an affordable payment plan (APP);
- And utilizing energy services to optimize on energy efficiency.

Training: Client education

**American Society of Heating, Refrigerating and Air Conditioning (ASHRAE) Member**

ASHRAE is an organization overseeing and developing ventilation standards.

**Air Conditioning Contractors of America (ACCA)**

ACCA advocates for the HVAC industry, provides HVAC training opportunities, assists with HVAC related accreditations, and is active with HVAC standards and codes.

**Energy Out West (EOW)**

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

**International Code Council (ICC)**

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

**Building Performance Institute (BPI)**

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

**National Renewable Energy Laboratory (NREL)**

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

**Oak Ridge National Laboratory (ORNL)**

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

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

**Analysis for State Training and Technical Assistance:**

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

- Local training activities and local training and technical expenditure reports
- MiTEC monthly attendance and monthly training reports
- MiTEC quarterly training schedule
- Monthly review of MiTEC to measure and track training effectiveness
- Onsite monitoring of local programs
- Regular meetings of instructors, technical staff, and weatherization leadership
- Students show a certificate of completion for completing each class, which are maintained by subgrantees, students, and MiTEC and reviewed by MDHHS-BCAEO Weatherization Technical Staff
- Feedback from subgrantees is used to direct training, technical assistance, field guidance, and policy
- As Michigan Weatherization Leadership work with Subgrantees, training needs are routinely discussed and incorporated to ensure that MiTEC can respond to requests
- Review of Subgrantee rosters of individuals and companies working in the WAP aligned with a JTA or as a contracted company. As available, MDHHS-BCAEO utilizes this information to drive MiTEC's training planning goals.
- Monitoring reports are shared with MiTEC, subgrantees, and the subgrantee board chair.
- Common issues identified during monitoring are discussed with instructors to highlight for training. Instructors may accompany monitors during monitoring engagement.
- The MiTEC Board will meet quarterly to discuss training issues and requirements and to direct and improve the process of training the weatherization network.
- MDHHS-BCAEO is working towards calculating effectiveness in energy efficiency of weatherized jobs through pre- and post-utility data collection and training on an energy efficiency model.
- MDHHS-BCAEO evaluates production and expenditure goals on a quarterly basis and shares results with the subgrantees which has been a method of continuous improvements, efficient and effective processes, and strong training commitment from the network.



### 3.0 – WORKFORCE CREDENTIALS

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

FEDERALLY REQUIRED CREDENTIALS. EXAMPLES INCLUDE:

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

Michigan ensures subgrantee's technical weatherization staff have the knowledge skills and abilities to meet the DOE identified National Renewable Energy Laboratories Job Task Analysis (JTAs) for each position as outlined in WPN 22-4. MiTEC has increased the number of online and field Proctors as well as added a Proctor/Mentor to meet the increasing needs of the network staff attempting certifications. Based on trends from PY23, MiTEC anticipates 350+ proctoring hours for required certifications in the WAP. Through coordination with Subgrantees, this facilitates advancing weatherization professionals in their careers and expanding the weatherization workforce.

#### HEP Quality Control Inspector Certification: (Required)

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

#### QCI Mentee Option

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

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

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

#### EPA Lead Renovation, Repair and Painting (LRRP) Certification: (Required)

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

- Remodeling and repair/maintenance
- Electrical work



- Plumbing
- Painting preparation
- Carpentry
- Window replacement

Weatherization installation for jobs subject to the rule must be overseen by an EPA Certified Renovator. In order to comply with EPA rules, shell contractor companies and agencies that employ crews must hold the EPA firm license in addition to requirements for individuals. Different roles in Weatherization have different requirements for Lead Safe Work (LSW) or LRRP training and certification. All required training/certification must be completed within 180 days of the date they are hired.

**GRANTEE/STATE REQUIRED CREDENTIALS. EXAMPLES INCLUDE:**

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

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

**Interstate Renewable Energy Council (IREC) Accreditation**

MiTEC became a IREC accredited training center on July 14, 2020 to conduct training on the following JTAs:

- Crew Leader
- Energy Auditor
- Quality Control Inspector

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

**State of Michigan Energy Auditor Certification: (Required until HEP Energy Auditor Certification is achieved)**

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

**HEP Energy Auditor Certification: (Required after 18 months of holding the SOM EA Certification)**

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

**Health and Safety (formerly IAQ/Mold) Certification of Completion: (Required)**

Health and Safety Certification of Completion will ensure weatherization workers can identify conditions that promote mold growth, health and safety issues (outlined in WPN 22-7), and how to prevent worsening conditions. New weatherization staff is required to achieve certification of completion within 180 days of the date of hire.

**Lead Safe Work (LSW) Certificate of Completion: (Required)**

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

**OSHA 10 Training/Certification: (Required)**

Training shall be provided by Occupational Safety and Health Administration qualified instructor. The construction “10-hour Occupational Safety and Health training course” is required for Weatherization staff in all JTAs. All individuals working in a JTA who have not attained certification will not be permitted to independently inspect, supervise, and/or work on the homes to be weatherized unless they are accompanied by or in the presence of staff who have attained the required certification. Documentation relative to certification shall be maintained at the agency. All required training/certification must be completed within 180 days of the date they are hired. The OSHA 30 hour course is not required for individuals in the Michigan WAP, but may replace the OSHA 10 hour to meet this requirement.

Individuals who have not attended and completed the Health and Safety course, LSW (or LRRP), and OSHA 10 will not be permitted to inspect, supervise, and/or work on the dwellings to be weatherized unless they are accompanied by or in the presence of staff who have attended the required training.

**SUBGRANTEE/LOCAL REQUIRED CREDENTIALS. EXAMPLES INCLUDE:**

- **CONTRACTOR LICENSING**

Subgrantees must maintain documentation regarding which contractors are currently working with the agency. Additionally, subgrantees must collect and maintain documentation of proper licensing and insurance for these contractors. Subgrantees with crews must maintain the appropriate licensing for the work conducted. This information is provided to BCAEO upon request during DOE plan submission and budget processing or during monitoring.

Through monitoring, BCAEO monitors review a selection of documentation collected by the subgrantee to confirm up to date licenses including residential builders license, residential maintenance and alterations, mechanical license, LRRP Firm certification, and insurance. Specific insurance requirements are detailed in MDHHS contract language.

Subgrantee Documentation Requirements:

- Documentation (e.g. copy of certificate) of Environmental Protection Agency (EPA) required Lead Renovator Repair Painting (LRRP) training for crew, staff, and subcontractors
- Documentation (e.g. copy of certificate) of EPA LRRP Firm status as required including expiration date
- Documentation of individuals’ certification in LSW (if not LRRP certified)
- Documentation of individuals’ certification in IAQ/H&S training
- Documentation of individuals’ certification in OSHA 10 hour or 30 hour
- Documentation of all individuals’ participation in comprehensive training and their relevant certifications, if applicable.

**INDUSTRY REQUIRED CREDENTIALS. EXAMPLES INCLUDE:**

- **EQUIPMENT/MATERIAL MANUFACTURER CERTIFICATION**
- **VENDOR CERTIFICATION**  
(E.G. EQUIPMENT/MATERIAL MANUFACTURE CERTIFICATION, VENDOR CERTIFICATION)

Subgrantees must maintain documentation of all equipment/material manufacturer certification. Information would be provided to BCAEO as needed during monitoring. Material Manufacturer Certification must be in the client file and provided to or posted in the client's home (as applicable). For example, the insulation certificate must be posted per the SWS and MFG. Subgrantees are responsible for maintenance and upkeep of equipment according to manufacturer specifications.

**PROCESS FOR MAINTAINING WORKFORCE CREDENTIALS**

To ensure Subgrantee Technical Weatherization Staff have the qualifications and skills to meet the DOE identified, National Renewable Energy Laboratories (NREL) Job Task Analysis (JTA), for each position in which the weatherization worker is employed, the BCAEO/MiTEC will ensure compliance with Weatherization Program Notice 22-4.

CSPM 618 outlines the required workforce credentials required for individuals working in a JTA as an Energy Auditor, QCI, Crew Leader and Retrofit Installer. They also detail requirements for renewal, suspension and decertification. Subgrantees provide a roster of active individuals working in the WAP. Subgrantees are responsible for collecting documentation on completed training and credentials such as the State of Michigan Energy Auditor Certification, BPI Energy Auditor Certification and BPI Quality Control Certification. BCAEO and MiTEC can pull reports from the Learning Management System (LMS) for training and classes completed with MiTEC. These reports can be used to confirm training compliance. Subgrantees are expected to confirm all required certification is up to date for Energy Auditors and QCIs. BCAEO Technical Monitors review a selection of documentation collected and provided by the agency to confirm proper credentials during monitoring.

All Subgrantees are responsible for ensuring that all weatherization workers are familiar with the NREL JTAs for each position and performing work to meet the JTA standards and the Standard Work Specifications in order to ensure quality work on every weatherization project. It is the Subgrantees responsibility to ensure that all untrained staff must not be left without supervision in the field during weatherization. All individuals working in a JTA must also participate in Comprehensive training on a regular basis as defined for each JTA.

Student Services has started working with individuals in the MI network with EA and QCI certifications tracking. As expiration dates near, Student Services will reach out to individuals ahead of the expiration and offer assistance on recertification or achieving the next credential. This has started with Energy Auditors who are State of Michigan Certified transitioning to the BPI EA Certification. Staff will work directly with the SOM EA on refresher training (as needed) and scheduling the BPI testing.

**HOW CREDENTIALS ARE TRACKED**

Subgrantees are expected to maintain documentation identifying the roster of contractors and individuals working in the WAP. Subgrantees are expected to maintain documentation of credentials and provide copies to the State by uploading to SharePoint (or as directed). MDHHS-BCAEO has a Learning Management System (LMS) to track training provided by MiTEC and are working on an integration plan so all credentials, training, and certifications are maintained in one location. Reports for training provided by MiTEC can be pulled from the LMS.

All training completions, dates, staff, and certifications for the Weatherization Assistance Program (WAP) that have occurred outside of MiTEC are to be entered by each subgrantee into SharePoint within 30 days of completion. For each of these items that happened within MiTEC, the student's record is maintained within the Learning Management System (LMS) and does not need to be submitted in SharePoint. Each Subgrantee is required to inform BCAEO of any agency contractor/staff that achieves any of the Home Energy Professional certifications. Subgrantees can inform BCAEO by emailing the MDHHS-BCAEO@Michigan.gov mailbox and including the Agency name, certified staff/contractor, type of certification, and date of certification.

## 4.0 – TRAINING

GRANTEES HAVE TWO OPTIONS TO DESCRIBE THEIR TRAINING.

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

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

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

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



### TTA Planning and Reporting Template F

#### PROGRAMMATIC/ADMINISTRATION TRAINING

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

Subgrantees are required to administer this grant following the U.S. DOE WAP regulations and guidance. The CSPM will prevail when the manual has policy that contains requirements different from WAP regulations. The subgrantees will determine which weatherization measures will be completed on an eligible dwelling unit in accordance with the Michigan Weatherization Field Guide and the Inspection/Testing/Energy Audit Requirements.

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

Training in key topic areas will be developed and delivered over the next three years. When possible, MDHHS-BCAEO will record classes and make them available online. Training topics are held at conferences and other MDHHS-BCAEO training opportunities. It is expected that all new weatherization managers participate in new manager training. This may be offered in a cohort or as individual support depending on capacity. Frequency may be adjusted based on the needs identified for the network.

#### **Financial Management Training:**

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

#### **Program Management Training:**

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

MDHHS-BCAEO will run new manager cohorts based on the needs of the network. This may include monthly training; or, specific offerings based on identified needs from the network.

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

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

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

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

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

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

### **Comprehensive Training Plan**

#### **Focus Areas:**

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

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

Course Offering	Minimum Number of Completed Trainings	JTA Alignment			
		EA	QCI	CL	RI
Energy Auditor	6	X	X		
Quality Control Inspector	7		X		
Crew Leader	6			X	
NEAT/MHEA Setup	5	X	X		
NEAT/MHEA Data Entry	10	X	X		
Air Sealing	15			X	X
Zone Pressure Diagnostics	7	X	X		
Combustion Appliance Zone (CAZ)	6	X	X		
ASHRAE 62.2	6	X	X		
Dense Pack Insulation	15			X	X
Mobile Home Weatherization	9			X	X
Mechanical Systems Inspection for Auditors	7	X	X		
Weatherization 101	8			X	X
Venting & Combustion Air	10	X	X		
Foundation Insulation	15			X	X

In addition to the number of classes above, as Subgrantees contact MiTEC with specific needs at their organization, MiTEC will coordinate additional training events.

**Course Catalog:****Crew Leader Training**

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

(BPI CEUs: 3.25)

**Learning objectives:**

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



- Associate the importance of safe work practices throughout the project
- Calculate and anticipate the need for controlled ventilation

#### **Comprehensive Classes:**

- Crew Leader (not needed for retrofit installer)
- Weatherization 101
- Air Sealing
- Dense Pack Insulation
- Foundation Insulation
- Advanced Mobile Home Weatherization

OR: Performance-Based Training Module (Retrofit Installer option)

#### **Certifications:**

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

#### **Regular Training and Updates:**

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

#### **Energy Auditor Training**

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

**Prerequisites:**

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

**Learning objectives:**

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

**Comprehensive Classes:**

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

**Certification:**

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

**Regular Training and Updates:**

- Additional T/TA , Math prep, and Energy Auditor Intermediate trainings are offered to SOM EAs prior to taking their BPI EA exams.
- New Energy Auditors will participate in the classes and must successfully achieve the State of Michigan Energy Auditor Certificate during their first 18 months in the field.
- MDHHS-BCAEO expects Energy Auditors to attend all state required training during the year to ensure updates occur in the field. Updates are provided at the annual conferences sponsored by MDHHS-BCAEO.
- Energy Auditors must take one comprehensive class listed above every 3 years and all required classes for the program year.
- Energy Auditors must recertify the HEP Energy Auditor Certification every 3 years.

## Quality Control Inspector Training

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

### Learning Objectives:

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

### Prerequisites:

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

### Comprehensive Class:

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

### Certification:

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

**Regular Training and Updates:**

- MDHHS-BCAEO expects Quality Control Inspectors to attend all state required training during the year to ensure updates occur in the field. Updates are provided at the two annual conferences sponsored by MDHHS-BCAEO.
- Quality Control Inspectors must take one comprehensive class listed above every 3 years and all required classes for the program year.
- Quality Control Inspectors must recertify the HEP Quality Control Inspector Certification every 3 years.

**ASHRAE 62.2 Training**

This one-day class is intended to provide a comprehensive perspective on ASHRAE 62.2-2016 compliance. Air sealing is a fundamental and necessary part of Weatherization that often leads to the home being tighter than is prudent to maintain healthy indoor air quality. We will address the “whys,” the need for ventilation, and hopefully answer the question: “When do we stop air sealing?” Mechanical ventilation replaces this lack of natural air exchange. As occupant ventilation will be required in most homes, there are multiple options that can be used for compliance such as bath fans, range hoods, in-line fans, HRVs and ERVs. This class will cover requirements of the standard, equipment selection criteria, installation issues, controls, operational testing, and client education. Also discussed will be data input for ASHRAE calculators.

**Learning Objectives:**

- Review requirements listed in the standard
- Discuss how air sealing and ASHRAE interact
- Explore equipment and control operations for compliance on a variety of home types
- Look at installation concerns and operational testing
- Reinforce the importance of client education

**Classes:**

- ASHRAE 62.2 training by MITEC

**Certification:**

- Certification of Completion

**Combustion Appliance Zone Training**

This 1-day class is designed for Auditors and Technicians who are responsible for performing Combustion Appliance Zone (CAZ) pressure diagnostics and affecting repairs. We have long been familiar with the term “worst case” draft testing and Health and Safety (H&S) has always been our first consideration when performing CAZ pressure testing. While H&S is our primary concern, there are also building durability, comfort, indoor air quality, and efficiency issues that we must consider. In this class we will discuss concepts and root causes of pressure issues along with CAZ testing procedures and equipment. From a more complete perspective, participants will then be challenged to interpret diagnostic test results and identify appropriate repairs to help ensure that the building works in all respects.

**Learning Objectives**

- Define the concepts behind how structural and mechanical systems interact in residential buildings.
- Learn how pressure imbalances caused by these interactions create problems with health & safety, building durability, comfort, and energy efficiency.
- Review all Auditor responsibilities regarding CAZ pressure testing and operational testing of appliances

under “worst case” conditions.

- Explore how the review of the CAZ pressure testing results can help drive work scope development and remediation of problems.

**Class:**

- CAZ training by MiTEC

**Certification:**

- Certification of Completion

**Regular Training and Updates:**

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

### Mobile Home Training

It is widely believed that there is limited potential for energy savings in mobile homes when the reality is that there are energy savings opportunities that often get overlooked. This one-day class will cover the unique characteristics of mobile home construction, find the necessary guidance to perform weatherization measures properly, and define the techniques and strategies necessary for successful mobile home weatherization.

**Learning Objectives:**

- Recognize mobile home -specific tools and requirements
- Identify mobile home-specific health and safety concerns
- Review air sealing techniques specific to mobile homes
- Review duct system sealing, repairs, and diagnostics
- Determine appropriate mobile home retrofit insulation techniques and options
- Exercise general mobile home best practices

**Classes:**

- Mobile Home training by MiTEC

**Certification:**

- Certification of Completion

### Air Sealing Training

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

**Learning Objectives:**

- Describe the function and location of pressure and thermal boundaries
- Summarize the basic concepts, theory, and principles of air leakage
- Identify access to specific air sealing work areas
- Apply protective measures and cleaning practices while working on the home
- Recognize signals of compromised pressure and thermal boundaries

- Characterize common air sealing tools, materials, and material characteristics
- Categorize air sealing opportunities and common leakage sites
- Explain basic blower door functionality to verify an effective air barrier has been established
- Describe treatment options for walk-up attics and other unique air sealing details

**Certification:**

- Certification of Completion

### Dense Pack Insulation

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

**Learning Objectives:**

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

**Certification:**

- Certification of Completion

### Foundation Insulation

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

**Learning Objectives:**

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

**Certification:**

- Certification of Completion

### **Mechanical Systems Inspection for Auditors (MSIA)**

This two-day class is intended to provide Auditors with the knowledge base to properly identify the type and function of heating systems found in Weatherization homes. Participants will be exposed to different system types, operational characteristics, sequences of operation, and basic testing procedures. It is intended that students will gain the skills necessary to provide a general visual inspection with a focus on Auditor responsibilities as part of the Weatherization Audit process. While not a prerequisite, this would be a beneficial course to attend prior to attending the Energy Auditor course.

#### **Learning objectives:**

- Be exposed to components and operational characteristics of residential heating equipment
- Discuss design characteristics and sequences of operation
- Review Auditor responsibilities regarding operational testing of appliances
- Review Auditor responsibilities regarding visual inspection of existing appliances

#### **Certification:**

- Certification of Completion

### **NEAT/MHEA Data Entry**

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

### **NEAT/MHEA Database Setup and Maintenance**

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

### **Venting & Combustion Air**

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

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

**Learning Objectives**

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

**Certification:**

- Certification of Completion

**Weatherization 101**

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

**Learning Objectives:**

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

**Certification:**

- Certification of Completion



## Zone Pressure Diagnostic Training

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

### Learning objectives:

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

### Certification:

- Certification of Completion

### SPECIFIC TECHNICAL TRAINING

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

- SAFETY DEVICES
- VENTILATION AND INDOOR AIR QUALITY
  - AMERICAN SOCIETY OF HEATING REFRIGERATION AND AIR-CONDITIONING ENGINEERS (ASHRAE)
- WINDOW REPAIR, DOOR REPAIR
- WORKER SAFETY
  - OSHA
- ADDITIONAL TOPICS AS DESCRIBED IN HEALTH & SAFETY PLAN
- CLIENT EDUCATION (TRAINING WORKERS TO CONDUCT CLIENT EDUCATION). EXAMPLES INCLUDE:
  - ENERGY SAVINGS STRATEGIES
  - PROGRAM-SPECIFIC INFORMATION. EXAMPLES INCLUDE:
    - WHAT TO EXPECT
    - ADDITIONAL RESOURCES
  - HEALTH & SAFETY ISSUES

**Focus Areas:**

- Specific Training will be developed as needed to enhance the knowledge and improve performance. Many of the specific trainings that will be utilized in Michigan will help to introduce topics at a basic level to help prepare weatherization professionals to attend comprehensive advanced courses. Classes created include a four-day Building Analyst class, a three-day Energy Auditor Intermediate class, a Heat Pump class, an SWS-Michigan Field Guide class, and a math for EA preparation class.
- Evaluating performance after comprehensive training to determine if other specific training needs could be helpful.
- Requirements for Weatherization Assistance Program as a base knowledge
  - Health and Safety Training
  - OSHA 10
  - LSW/LRRP
- Implement transition plan to convert to WA v10 (NEAT/MHEA)(Timeline TBD)
- Customized required training as needed.
- MDHHS-BCAEO will require training as necessary based upon DOE monitoring results, MDHHS-BCAEO monitoring results, and feedback provided from WAP stakeholders.
- MDHHS-BCAEO expects all weatherization professionals to attend all state required training during the year to ensure updates occur in the field. Updates are provided at the two annual conferences sponsored by MDHHS-BCAEO.
- All weatherization professionals must demonstrate outcomes from training in the field. Additional training may be required as noted in monitoring reports for weak work practices and lack of outcome achievement.

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

<b>Course Offering</b>	<b>Estimated Number of Completed Trainings</b>
Lead Safe Work (LSW)	Online training - taken as needed
Health & Safety Training	Online training - taken as needed
Intermediate Energy Auditor	4
Building Analyst	Offered upon request
SWS-Field Guide	3
Heat Pump	5
Multi-Family QCI	4

## Course Catalog for Specific Training:

### Lead Safe Work (LSW)

The intent of this training is to familiarize crews with safeguards that must be taken when dealing with lead in Weatherization. Lead is poisonous and may be present in older homes. Weatherization professionals working on these homes must be aware of the hazards of lead. Use of lead-safe weatherization is critical to protecting the health of workers, clients and their families. All employees and contractors working on pre-1978 homes must receive training to install measures in a lead-safe manner in accordance with the SWS and EPA protocols, and installation must be overseen by an EPA Certified Renovator.

#### Learning Objectives:

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

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

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

#### Class:

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

#### Certification:

- LSW Certification of Completion

#### Regular Training and Updates:

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

## EPA Lead Renovation, Repair and Painting (LRRP)

The US Environmental Protection Agency (EPA) produced the Lead Renovation, Repair and Painting Program that requires each job have an EPA Certified Renovator on-site during job set up and completion. Weatherization installation must be overseen by an EPA Certified Renovator. Crews must follow EPA's Lead, Renovation, Repair and Painting Program (LRRP) when working in pre-1978 housing unless testing confirms the work area to be lead free. The certified person is responsible for documenting that all work is done in a lead safe manner. LRRP Certification, in general, covers the following activities that disturbs in pre-1978 housing and child-occupied facilities:

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

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

- Energy Auditors and Quality Control Inspectors  
Individuals in these roles must receive either LSW or LRRP training and must follow EPA rules.
- Mechanical, Electrical and Plumbing Contractors  
Individuals in these roles must follow EPA rules; but there are no training requirements for individuals beyond those listed generally in this section.
- Shell Contractors and Crews  
Individuals in these roles must receive either LSW or LRRP training and must follow EPA rules.
- Shell contractor companies and agencies that employ crews must hold the EPA firm license in addition to requirements for individuals.

### **Class:**

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

### **Certification:**

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

### **Regular Training and Updates:**

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

## Health & Safety Training

The intent of this training is to provide attendees with weatherization policy regarding mold and moisture; knowledge to recognize the causes of existing mold growth; and the importance of not creating conditions that could promote new mold growth. We will also look at moisture concerns, moisture control

measures, the need for healthy indoor air quality, pollutant sources, client education and health effects of mold on occupants. The curriculum for the Health & Safety Training has been aligned with WPN 22-7 and the associated Table of Issues. Weatherization students will receive specialized training in the recognition of conditions that promote mold growth and other Health & Safety issues they may encounter in their weatherization work and how best to prevent creating new mold or worsening conditions.

**Learning Objectives:**

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

**Requirements by Roles:**

- Individuals required to attend the Health and Safety Class will not be permitted to inspect, supervise, and/or work on the dwellings to be weatherized unless they are accompanied by or in the presence of staff who have attended the required training.
- Energy Auditors and Quality Control Inspectors  
Individuals in these roles must receive Health & Safety Training.
- Mechanical, Electrical and Plumbing Contractors  
Individuals in these roles are not required to receive Health & Safety Training.
- Shell Contractors and Crews  
Individuals in these roles must receive Health & Safety Training.

**Class:**

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

- OSHA
- Additional topics from Michigan’s health & safety plan

**Certification:**

- Certification of Completion

**Regular Training and Updates:**

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

**OSHA-10 Hour Training**

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

**Requirements by Roles:**

- All Energy Auditors/QC Inspectors and agency crews/contractors who have not attained certification will not be permitted to independently inspect, supervise, and/or work on the homes to be weatherized unless they are accompanied by or in the presence of staff who have attained the required certification.
- Weatherization Agency Crew Leaders are no longer required to take the OSHA 30-hour course

**Classes:**

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

**Certification:**

- OSHA 10-Hour Certification of Completion

**Regular Training and Updates:**

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

**Intermediate Energy Auditor**

This 3-day Energy Auditor (EA) refresher class is intended to provide participants with the Home Energy Professional (HEP) EA knowledge, skills, and abilities involved in the process of becoming an Energy Auditor in the Weatherization Assistance Program. Participants are expected to have a knowledge base in place which will allow for a viable transition from knowing to implementation. The BPI HEP EA online test will be offered on the last day of class.

There are required prerequisites for this class:

- MiTEC’s five-day Energy Auditor class

- Students should be approved to challenge the BPI HEP EA online test
- Two- hour virtual Math Prep training is suggested

#### **Learning Objectives:**

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

#### **Building Analyst**

The MiTEC BPI Building Analyst course covers the fundamentals of building science and energy efficiency through technical instruction and real-life, hands-on problem solving. This is a 4-day training which covers many topics including whole-house assessment; indoor air quality; appliance efficiency; moisture regulation; health & safety; and the use of diagnostic equipment including Blower Door, Pressure Pan, Exhaust Fan Flow Meter, and Combustion Safety Testing Equipment. This course provides instruction for energy efficiency analysis using the house-as-a-system approach and prepares you for both the written and field certification examinations administered at the end of the class. MiTEC's Building Analyst course covers everything a candidate needs to know and demonstrate to successfully obtain BPI certification. The curriculum addresses all the Testable Knowledge Items listed for the BPI Building Analyst certification.

#### **Learning Objectives:**

- Identify basic structural components of residential construction
- Recognize the variety of systems in a home that affect the energy usage and health and safety
- Identify common building science issues including heat transfer, laws of thermodynamics, moisture issues, as well as computing R-value and U factor
- Demonstrate Building Analyst Knowledge skills and inspection processes in the field per BPI HEP BA standards
- Conduct Safety and efficiency performance tests to assess HVAC system conditions
- Incorporate Healthy Housing Principles into the auditing process
- Apply appropriate BPI Standards to collected data
- Prioritize solutions based on building science evaluations

#### **SWS-Field Guide**

This is a one-day class focused on navigating our Michigan Weatherization Field Guide and the NREL Standard Work Specifications (SWS). You will learn about the minimum acceptable outcomes for home energy upgrades installed on single-family, multifamily, and manufactured housing. While focusing on a "whole house" approach, instruction objectives will remove any potential confusion about what constitutes a quality energy efficiency upgrade that is effective, durable, and safe.

#### **Learning Objectives:**

Understand the anatomy of the NREL SWS and the Michigan Field Guide

Research the desired outcomes for specific weatherization measures

Navigate between the Michigan Field Guide and the NREL SWS via "hyperlinks"

Locate specific materials to be utilized to perform minimum acceptable outcomes

Recognize specifications and objectives and how to locate them

## Differentiate between Single Family, Multi Family, and Manufactured Housing

### Heat Pumps

For proper and predictable operation, it cannot be understated that a heat pump system must be properly sized and installed per manufacturer requirements and code. With the push for electrification from DOE, attendees should be able to identify when an HP is appropriate as an alternative source for heating and cooling. This one-day class begins with component identification and system operational basics. Discussed will be aspects of visual inspection of the line-set, outdoor unit, indoor unit, and ductwork if applicable of a heat pump system. Necessarily, this class will include basic air flow, heating/cooling load requirements, and how to investigate issues of a new or existing system. Manufacturer's installation manuals and mechanical code references will be used as guidance to help achieve proper operation and energy efficiency.

#### Learning Objectives:

- Recognize basic HP components and system operations
- Evaluate when a HP replacement is appropriate in Wx
- Review sizing requirements for a new HP system
- Identify installation concerns to ensure proper operation
- Discuss appropriate code directed guidance

### Multi-Family Quality Control Inspector

This 4-day Introductory course is for weatherization professionals that hold a current BPI Residential QCI certification and meets the DOE WAP requirements under WPN 22-4 for those wishing to perform QC Inspections on buildings of five units or larger. This course covers the NREL Job Task Analysis (JTA) for both the Multifamily Energy Auditor and Multifamily QC Inspector and after the successful completion of the written final assessment the attendee is awarded a Certificate of Completion.

#### Topics covered include:

- Introduction to Multifamily EA & QCI
- DOE and State Multifamily Requirements
- Multifamily Housing for Energy Auditors
- Engineering, Specifications, RFP, & Managing Subs
- Multifamily Blower Door Testing.
- Air leakage, Air sealing & Insulation Issues
- Ventilation and Indoor Air Quality
- Base Load
- Domestic Hot Water Systems
- Heating Systems
- Hydronic Distribution Systems
- Health & Safety
- JTA Duties and Tasks (A)-Reviewing Project Documents
- JTA Duties and Tasks (B)-Developing Quality Control Plan
- JTA Duties and Tasks (C)- Conducting Pre-Installation Site Visits
- JTA Duties and Tasks (D)-Conducting Site Visits
- JTA Duties and Tasks (D)-Conducting Site Visits
- JTA Duties and Tasks (E), Reporting QCI Observations and Findings



## State of Michigan Energy Auditor Training

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

## Other

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

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

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

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

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

### CONFERENCES. EXAMPLES INCLUDE:

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

MDHHS-BCAEO will participate in the following conferences as staff availability permits. DOE guidance states that DOE expects Grantees to budget adequate funds to allow staff to participate in nation and regional conferences as well as participation on related planning committees, task forces, and other scheduled and related meetings. DOE considers these events high priorities. In order to cover the substantial information disseminated at these events (multiple tracks, different areas of expertise), multiple staff may attend events to adequately obtain the information. MDHHS-BCAEO makes sure a staff person attends conferences that DOE will be presenting.

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

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

**OTHER, PLEASE SPECIFY:**

Michigan also holds an annual fall Weatherization Technical Conference.

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

- NASCSP
- National Weatherization Training Center Consortium

## 5.0 – TECHNICAL ASSISTANCE

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

### PROGRAMMATIC/ADMINISTRATION SUPPORT

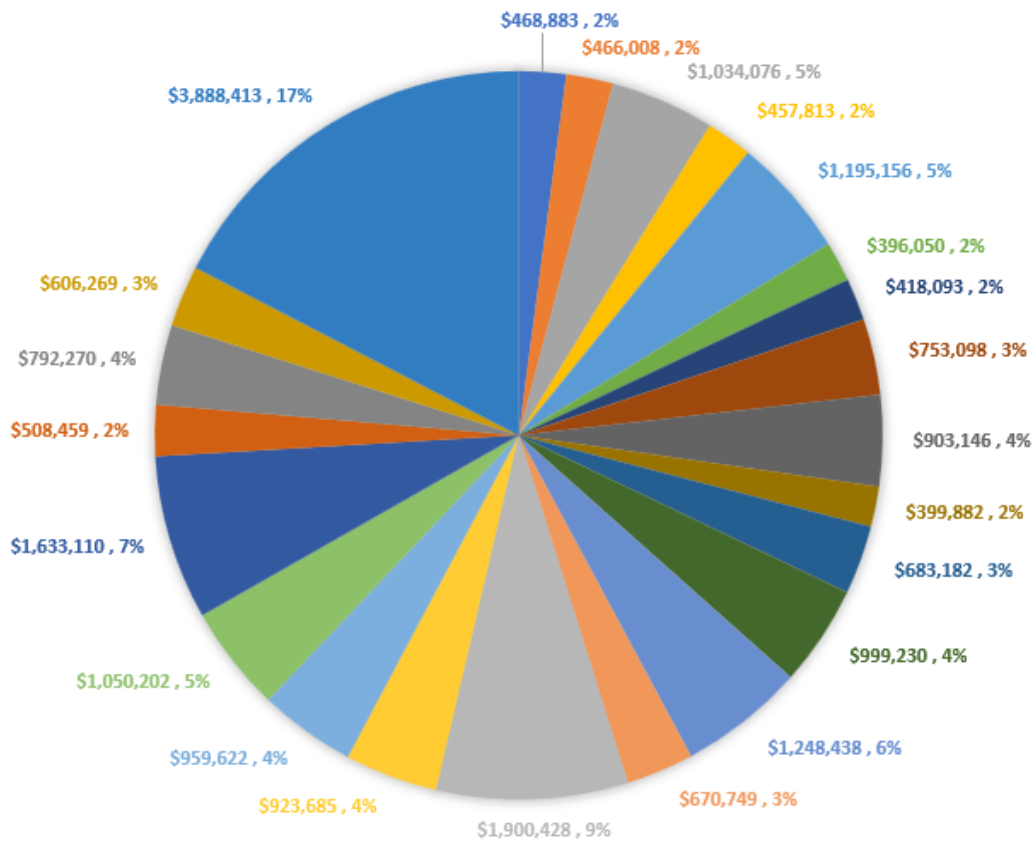
**Current Data Analysis shows:**

The Michigan Weatherization Program funds 23 Community Action Agencies administering the Weatherization Assistance Program (Below is a summary of the size of the network and a pie chart of PY 2023 Allocations by each agency)

The weatherization network is made up of 30% of small agencies with 14% of the total allocation. The extra-large agency, which is 1 of the 23, is allocated 18% of the funding. This setup is challenging in terms of providing technical assistance. The data shows that small to some medium agencies show signs of instability when one key weatherization staff person or contractor leaves the program. All agencies are experiencing difficulties in expanding their operations. In addition, over the past 3 to 5 years the majority of the weatherization managers at the agencies are new to their role. Approximately, 10 to 12 have 3 to 4 years of experience and about 5 to 7 have 2 to 3 years of experience.

Agency Size	Number of CAAs	Allocation Range	Allocation Total for Group	Allocation Total for Group Percent
Small	7	Under \$600,000 Allocation	\$ 3,115,188	17%
Medium	9	Between \$600,000 and \$1 m)	\$ 7,291,251	33%
Large	6	Between 1M-2.5M	\$ 8,061,410	36%
Extra Large	1	Over \$2.5 M	\$ 3,888,412	17%
	23		\$ 22,356,262	100%

MICHIGAN WEATHERIZATION NETWORK PY24 PLANNING ALLOCATION BY AGENCY



**Conditions for low production and/or delays include:**

- Lack of supplies or prolonged delays in supplies to complete measures
- Low number of contractors interested in working for the weatherization assistance program
  - Contractor demand for work in other fields is very high
  - Too many regulations
  - Difficulties in RFP process
  - Slow payments
  - Low pay due to cost restrictions from SIR and ACPU rules
- Low number of client applications
- High costs and limited supply for materials
- Adding and identifying new contractors to complete deferral reduction work prior to weatherization

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

- Programmatic Issues that need additional technical assistance
  - Income Eligibility
  - Program Management
  - Statewide Database
  - Financial Management
    - Procurement
    - Inventory
  - Rebuilding a weatherization program at the local level
  - Intake Training
  - New SHPO Submission Process

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

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

**TECHNICAL SUPPORT**

Technical Support is conducted in a variety of ways:

MDHHS-BCAEO/MiTEC will work with subgrantees that have been identified as needing additional T/TA through monitoring, to provide customized training in an effort to increase their ability to manage effective Weatherization programs.

**Program Staff**

MiTEC will work with program staff to meet the needs of expansion by providing multiple resources.

Program staff will request assistance in one of the following ways:

- Email our main email address with a request for help
- Call for assistance

- Sign up for training in the LMS
- Make a request specifically to MiTEC for field training. The instructions are found on the MiTEC website
- Request a session on LMS navigation and/or career pathways
- As a result of quality assurance monitoring and/or programmatic/financial monitoring, MDHHS-BCAEO staff will provide or identify technical assistance

Upon receiving requests for assistance, MiTEC will work to determine how best to provide technical support. This may be a one-on-one assistance, or identifying which comprehensive or specific training class best meets the request. Additionally, MiTEC and BCAEO will work to produce resources if multiple requests on the same topic are received.

### **Auditors**

- A two-hour virtual Math Prep class will be offered to prospective EAs prior to each Energy Auditor class. It has been observed that prospective EAs struggle with the written BPI test and as a result this training has been created.
- A two-hour virtual auditor mentoring session is available in the LMS. These sessions have been added as a result of monitoring and expansion efforts across the network. These one-on-one mentoring sessions will discuss all facets of auditing and strengthen the network's ability to meet program standards.
- It is anticipated that MiTEC will assist 20+ auditors (to be based on requests)
- A two-hour SOM EA virtual file review session has been added to the LMS. Upon completing the over the shoulder skills verification, new auditors must submit initial weatherization audits for review. These audit reviews allow new SOM EAs to review their initial audits with a certified professional. Virtual SOM EA file reviews have been initiated to ensure new auditors comprehend the program requirements and have the knowledge, skills, and ability to independently perform the functions of an Energy Auditor for the Weatherization Assistance Program. Additionally, these sessions allow new auditors to receive timely feedback. This additional review allows for oversight and support when considering nuances specific to the Weatherization Assistance Program.
- It is anticipated that the MI network may see 15+ new auditors. Each new auditor will have typically 1-3 auditors reviewed. For new auditors, 20-45 audit review sessions are anticipated.

### **Contractors/crews**

- Expansion has introduced contractors/crews that are new to the Weatherization Assistance Program.

In addition to the robust RIT/CL JTA courses offered by MiTEC, a hands-on mentoring program will enable MiTEC to work directly with new Weatherization contractors and crews. This hands-on approach will afford MiTEC the ability to address all areas of the Weatherization Assistance Program onsite and with real life situations. The contractor/crew mentoring delivery method will include combined classroom training along with a thorough review of audit runs and work orders, thus providing an opportunity to work with agencies through that process. This is currently 2 days in classroom and one day onsite and includes Air Sealing, Dense Pack Wall Insulation, and Foundation Insulation training.

- Expansion will introduce contractors/crews to other Energy Auditing Opportunities  
MiTEC will work to schedule requested trainings from contractors/crews that are not yet in the Weatherization Assistance Program, who are seeking training from MiTEC to meet their needs, such as Energy Auditing, Building Analyst, and Quality Control Inspector

<b>HEALTH &amp; SAFETY SUPPORT ACTIVITIES</b>											
<p>The MDHHS-BCAEO and MiTEC support Health and Safety activities in many ways. The MDHHS-BCAEO Technical monitors are available to assist subgrantees as questions and uncertain situations arise. Examples of guidance provided by the monitors range from defining friable asbestos, to addressing vermiculite in the attic, to moisture issues, to data entry related to ASHRAE 62.2 calculations, to interpreting policy and regulations. MiTEC staff are available to provide guidance on proper Health and Safety measure installations. MiTEC staff answer questions related to items such as ASHRAE 62.2 installations, LSW methods, vapor barrier installations, adding ventilation, and building tightness to name a few.</p>											
<b>MONITORING</b>											
<b>WHAT PERCENTAGE OF T&amp;TA FUNDING IS ALLOCATED TO MONITORING? (IF DEFINED IN SECTION B OF THE BUDGET DETAILS WITHIN THE ANNUAL APPLICATION, INCLUDE THAT WITHIN YOUR DESCRIPTION BELOW.)</b>											
<p>Training &amp; Technical Assistance Budget Breakdown</p> <table border="1"> <tbody> <tr> <td>Monitoring</td> <td style="text-align: right;">\$355,249</td> <td style="text-align: right;">9%</td> </tr> <tr> <td>Training</td> <td style="text-align: right;">\$3,526,976</td> <td style="text-align: right;">91%</td> </tr> <tr> <td><b>Total</b></td> <td style="text-align: right;"><b>\$3,882,225</b></td> <td style="text-align: right;"><b>100%</b></td> </tr> </tbody> </table>			Monitoring	\$355,249	9%	Training	\$3,526,976	91%	<b>Total</b>	<b>\$3,882,225</b>	<b>100%</b>
Monitoring	\$355,249	9%									
Training	\$3,526,976	91%									
<b>Total</b>	<b>\$3,882,225</b>	<b>100%</b>									
<b>OTHER, PLEASE SPECIFY</b>											
DESCRIBE OTHER TECHNICAL ASSISTANCE ACTIVITIES HERE											

## 6.0 CLIENT EDUCATION

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

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

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

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

The goal of the Weatherization Assistance Program is for the weatherization team (weatherization coordinator, intake staff, auditors, inspectors, and crews/contractors) and the client to work together as partners to save energy, to make the home more comfortable, and reduce energy bills. The weatherization team must be aware of the importance of energy education for the client. Every effort must be made to increase client awareness through multiple contacts during the weatherization process. Staff and contractors must be aware they are the critical link in the partnership goal. Inclusion of the goal statement on literature, brochures, and forms the client must sign reinforces the partnership goal.

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

## Intake

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

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

- Introduce the Weatherization Assistance Program. Explain the concept of the program, what work may be done, and expectations for the applicant's participation.
- Notify the applicant of the eligibility determination and set appropriate client expectations.
- Ask the applicant to prepare for the audit by:
  - Making a list of energy questions and concerns
  - Making the attic, basement, and crawl space accessible
  - Making the perimeter accessible
  - Securing pets
  - Planning to be home and ready to participate

## Audit

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

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

- Explain the Weatherization Assistance Program, stressing what each partner will do during each step.
- Explain the agenda of the audit and what the client will need to do.
- Discuss building science concepts such as house as a system, how a home can lose/gain heat
- Inquire about the heating system. Talk with the client about whether some rooms seem warmer while others are cooler. Show the client how to adjust heat flow to different areas to save energy and provide more comfort.
- Point out areas where the client could take action to save energy and money.
- Complete the audit.
- Summarize the results of the audit for the client.
- Explain the nature of the work that may be done on the home.
  - If the client is actively participating, agree on three energy action steps for the client to do.
  - If the client is actively participating, the Client Plan of Action should be signed by the client and auditor.
  - A copy is to be provided to the client and the original must be uploaded to the client file.

## Weatherization Work

When the crew or contractor is at the client's home, they 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 Subgrantee's Energy Education Plan.

- Complete a quick survey of the home, accompanied by the client. Reinforce the energy conservation work already done by the client.
- Discuss the work plan for the day and proposed work for the client. If possible, reinforce the three energy action steps to which the client committed.
- Complete the work. Summarize the day's work for the client.
- Explain the next step - final inspection.

### **Final Inspection**

Reinforce the partnership between the Subgrantee 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 Subgrantee's Energy Education Plan:

- Ask the client about the weatherization work.
- If appropriate, ask about the client's three energy action steps.
- Inspect the work.
- Follow up on referrals.
- If follow up is provided, explain the next step.

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

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



## CLIENT EDUCATION ACTIVITIES REGARDING H&amp;S ISSUES AS INDICATED IN WPN 17-7

- AIR CONDITIONING AND HEATING SYSTEMS
- ASBESTOS
- BIOLOGICALS AND UNSANITARY CONDITIONS
- BUILDING STRUCTURE AND ROOFING
- CODE COMPLIANCE
- COMBUSTION GASES
- ELECTRICAL
- FORMALDEHYDE, VOLATILE ORGANIC COMPOUNDS (VOCs), FLAMMABLE LIQUIDS, AND OTHER AIR POLLUTANTS
- FUEL LEAKS
- GAS RANGE/OVENS
- HAZARDOUS MATERIALS DISPOSAL
- INJURY PREVENTION OF OCCUPANTS AND WEATHERIZATION WORKERS
- LEAD BASED PAINT
- EPA'S LEAD RENOVATION, REPAIR & PAINTING PROGRAM (RRP) MOLD/MOISTURE
- PESTS
- RADON
- SAFETY DEVICES
- VENTILATION AND INDOOR AIR QUALITY
  - AMERICAN SOCIETY OF HEATING REFRIGERATION AND AIR-CONDITIONING ENGINEERS (ASHRAE)
- WINDOW REPAIR, DOOR REPAIR
- WORKER SAFETY
  - OSHA

## ADDITIONAL TOPICS AS DESCRIBED IN HEALTH &amp; SAFETY PLAN

Currently, each local subgrantee officially develops their own client handouts. MDHHS-BCAEO has focused on standardizing material, resource book, brochures, literature, videos, forms/checklists, and internet links to help clients understand the importance of maintaining the work done by weatherization crews. Most standardization has been completed and agencies are encouraged to utilize BCAEO created materials. A statewide virtual repository has been created for the subgrantees to use in their client education events as well as with each client. The statewide digital library of resources, as well as print copies, will also contain methods and the appropriate time in teaching, informing, and sharing information with the client.

MDHHS-BCAEO has a Weatherization Coordinator who has taken the lead on enhancing the client ed and outreach materials that are provided by the state. She has developed many materials for the resource library, attended events targeting our various outreach groups (general public, potential contractors, potential clients and workforce development individuals), been the point person for all interest surveys, and helped with all expansion efforts.

Health & Safety flyers that align with the health and safety topics in WPN 22-7 have been developed and made available to the Subgrantee network. Material will also ensure the most up-to-date information is used in the material to provide clients with energy savings tips and strategies, how to maintain weatherization measures, and how to reduce energy costs. The material and media will encourage the client to take action in maintaining their energy efficiency.

## APPLICATION FOR FEDERAL ASSISTANCE SF-424

Version 02

## 1. Type of Submission:

- Preapplication
- Application
- Changed/Corrected Application

## 2. Type of Application:

- New
- Continuation
- Revision

If Revision, select appropriate letter(s)

Other (specify):

## 3. Date Received

12/16/2022

## 4. Applicant Identifier:

## 5a. Federal Entity Identifier:

## 5b. Federal Award Identifier:

DE-EE0009909

## State Use Only:

## 6. Date Received by State:

12/16/2022

## 7. State Application Identifier:

## 8. APPLICANT INFORMATION:

a. Legal Name: State of Michigan

## b. Employer/Taxpayer Identification Number (EIN/TIN):

386000134

## c. UEI:

C2AQVDYYUAS7

## d. Address:

Street 1: P.O. Box 30195

Street 2: 333 S Grand Ave

City: Lansing

County: INGHAM County

State: MI

Province:

Country: U.S.A.

Zip / Postal Code: 489097695

## e. Organizational Unit:

## Department Name:

Michigan Department of Health and Human Services

## Division Name:

Bureau of Community Action &amp; Economic Opportunity

## f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Ms First Name: Kris

Middle Name:

Last Name: Schoenow

Suffix:

Title: Bureau Director

Organizational Affiliation: Michigan Department of Health and Human Services

Telephone Number: 5173883085

Fax Number:

Email: Schoenowk@michigan.gov

**APPLICATION FOR FEDERAL ASSISTANCE SF-424**

Version 02

**9. Type of Applicant:**

A State Government

**10. Name of Federal Agency:**

U. S. Department of Energy

**11. Catalog of Federal Domestic Assistance Number:**

81.042

CFDA Title:

Weatherization Assistance Program

**12. Funding Opportunity Number:**

DE-WAP-0002024

Title:

2024 Weatherization Assistance Program (WAP)

**13. Competition Identification Number:**

Title:

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Michigan - Statewide

**15. Descriptive Title of Applicant's Project:**

The Weatherization Assistance Program enables low-income families to permanently reduce their energy bills while making their homes more energy efficient, safe, and healthy.

## APPLICATION FOR FEDERAL ASSISTANCE SF-424

Version 02

**16. Congressional District Of:**

a. Applicant: Michigan Congressional District 07

b. Program/Project: MI-Statewide

Attach an additional list of Program/Project Congressional Districts if needed:

**17. Proposed Project:**

a. Start Date: 07/01/2024

b. End Date: 06/30/2025

**18. Estimated Funding (\$):**

a. Federal	21,860,318.00
b. Applicant	0.00
c. State	0.00
d. Local	0.00
e. Other	0.00
f. Program Income	0.00
g. TOTAL	21,860,318.00

**19. Is Application subject to Review By State Under Executive Order 12372 Process?:**

- a. This application was made available to the State under the Executive Order 12372 Process for review
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E.O. 12372

**20. Is the applicant Delinquent On Any Federal Debt? (If "Yes", provide explanation)**

No

**21. By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to**

 I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency

**Authorized Representative:**

Prefix: Mr First Name: Daniel

Middle Name:

Last Name: Lance

Suffix:

Title: Financial Analyst

Telephone Number: 5172844255

Fax Number:

Email: lanced@michigan.gov

Signature of Authorized Representative: Signed Electronically

Date Signed: 06/28/2024

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
**WEATHERIZATION ANNUAL FILE WORKSHEET**  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

**IV.1 Subgrantees**

<b>Subgrantee (City)</b>	<b>Planned Funds/Units</b>
Baraga-Houghton-Keweenaw CAA (Houghton)	\$468,883.00 28
Blue Water Community Action (Port Huron)	\$466,008.00 28
Capital Area Community Services Inc (Lansing)	\$1,034,076.00 65
Chippewa-Luce-Mackinac Community Action and (Sault Ste Marie)	\$457,813.00 27
Community Action Agency of South Central Michigan (Battle Creek)	\$1,195,156.00 75
Community Action of Allegan County (Allegan)	\$396,050.00 23
Dickinson-Iron Community Services Agency (Iron Mountain)	\$418,093.00 25
EightCAP Inc (Orleans)	\$753,098.00 46
FiveCAP Inc (Scottville)	\$0.00 0
Genesee County Community Action Resource Department (Flint)	\$903,146.00 56
Gogebic-Ontonagon CAA (Bessemer)	\$399,882.00 23
Human Development Commission (Caro)	\$683,182.00 42
International Center for Appropriate & Sustainable Technology (Lakewood)	\$0.00 0
KENT, COUNTY OF (INC) (Grand Rapids)	\$999,230.00 62
Macomb Community Action (Clinton Township)	\$1,248,438.00 78
Menominee-Delta-Schoolcraft Community Action Agency and (Escanaba)	\$670,749.00 41
Mid Michigan CAA Inc (Farwell)	\$1,900,428.00 121
Monroe County Opportunity Program (Monroe)	\$923,685.00 57
Northeast Michigan Community Action Agency (Alpena)	\$959,622.00 60
Northwest Michigan Community Action Agency (Traverse City)	\$1,050,202.00 66
Oakland Livingston Human Services Agency (Pontiac)	\$1,633,110.00 103
Ottawa County CAA (Holland)	\$508,459.00 30
Saginaw County Community Action Committee (Saginaw)	\$0.00 0
Southwest Michigan CAA (Benton Harbor)	\$792,270.00 49

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
**WEATHERIZATION ANNUAL FILE WORKSHEET**  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

Washtenaw County (Ypsilanti)	\$606,269.00 37
Wayne Metropolitan Community Action Agency (Detroit)	\$3,888,413.00 251
<b>Total:</b>	<b>\$22,356,262.00</b> <b>1,393</b>

**IV.2 WAP Production Schedule**

Weatherization Plans	Units
Total Units (excluding reweatherized)	1,383
Reweatherized Units	10
Average Unit Costs, Units subject to DOE Project Rules	
<b>VEHICLE &amp; EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)</b>	
A Total Vehicles & Equipment (\$5,000 or more) Budget	\$100,000.00
B Total Units Weatherized	1,383
C Total Units Reweatherized	10
D Total Dwelling Units to be Weatherized and Reweatherized (B + C)	1,393
E Average Vehicles & Equipment Acquisition Cost per Unit (A divided by D)	\$71.79
<b>AVERAGE COST PER DWELLING UNIT (DOE RULES)</b>	
F Total Funds for Program Operations	\$11,728,983.00
G Total Dwelling Units to be Weatherized and Reweatherized (from line D)	1,393
H Average Program Operations Costs per Unit (F divided by G)	\$8,419.94
I Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$71.79
J Total Average Cost per Dwelling (H plus I)	\$8,491.73

**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	1393	29.3	40815
Prior Year Estimate	1244	29.3	36449
Prior Year Actual	1194	29.3	34984
<b>Method used to calculate savings description:</b>			
<p>The WAP algorithm that Michigan uses is based on the most recent meta evaluation 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 <b>million site BTUs</b>.</p> <p>The Program Year (PY) 2024 estimate of energy savings for the DOE funding (PY24 funding) is: 1,393 homes x 29.3 million site BTUs per home = 40,815 million site BTUs.</p>			

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

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
**WEATHERIZATION ANNUAL FILE WORKSHEET**  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

**IV.5 Policy Advisory Council Members**

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

Community Action Agency of South Central Michigan	Type of organization: Non-profit (not a financial institution) Contact Name: Mr. Jeffrey Short Phone: 2694411634 Email: <a href="mailto:jeffreys@caascsm.org">jeffreys@caascsm.org</a>
Consumers Energy	Type of organization: Utility Contact Name: Ms. Yvonne K. Lewis Phone: 5172626245 Email: <a href="mailto:Yvonne.Lewis@cmsenergy.com">Yvonne.Lewis@cmsenergy.com</a>
International Center for Appropriate & Sustainable Technology	Type of organization: Non-profit (not a financial institution) Contact Name: Keesha Johnson Phone: 3034821096 Email: <a href="mailto:keeshaj@icastusa.org">keeshaj@icastusa.org</a>
Michigan Community Action Agency Association Weatherization Committee	Type of organization: Non-profit (not a financial institution) Contact Name: Mr. Brian McGrain Phone: 5176796400 Email: <a href="mailto:bmcgrain@micommunityaction.org">bmcgrain@micommunityaction.org</a>
Michigan League for Public Policy	Type of organization: Non-profit (not a financial institution) Contact Name: Ms. Julie Cassidy Phone: 5172146006 Email: <a href="mailto:jcassidy@mlpp.org">jcassidy@mlpp.org</a>
Mid Michigan CAA Inc	Type of organization: Non-profit (not a financial institution) Contact Name: Mr. Johnny Mills Phone: 9894180937 Email: <a href="mailto:jmills@mmcaa.org">jmills@mmcaa.org</a>
Monroe County Opportunity Program	Type of organization: Non-profit (not a financial institution) Contact Name: Ms. Sandra Wilson Phone: 7342412775 Email: <a href="mailto:swilson@monroecountyop.org">swilson@monroecountyop.org</a>
State of Michigan	Type of organization: Unit of State Government Contact Name: Brad Banks Phone: 5172848118 Email: <a href="mailto:BanksB1@michigan.gov">BanksB1@michigan.gov</a>
State of Michigan	Type of organization: Unit of State Government Contact Name: Ms. Nicole Denson-Sogbaka Phone: 5178973345 Email: <a href="mailto:densonsogbakan@michigan.gov">densonsogbakan@michigan.gov</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: Carin Speidel Phone: 5172844819 Email: <a href="mailto:SpeidelC@michigan.gov">SpeidelC@michigan.gov</a>
State of Michigan	Type of organization: Unit of State Government Contact Name: Julie Mclaughlin Phone: 2317333753 Email: <a href="mailto:mclaughlinj@michigan.gov">mclaughlinj@michigan.gov</a>
The Upper Peninsula Power Company	Type of organization: Utility Contact Name: Mr. Andrew McNeally Phone: 9064492013 Email: <a href="mailto:amcneally@upppo.com">amcneally@upppo.com</a>
Walker Miller Energy Services	Type of organization: For-profit or Corporate (not a financial institution or utility) Contact Name: Mr. Ben Dueweke Phone: 3133668535 Email: <a href="mailto:dueweke@wmenergy.com">dueweke@wmenergy.com</a>

**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
**WEATHERIZATION ANNUAL FILE WORKSHEET**  
**Grant Number: EE0009909, State: MI, Program Year: 2024**  
**Recipient: State of Michigan**

Wayne Metro Community Action Agency	Type of organization: Non-profit (not a financial institution) Contact Name: Mr. John Carmody Phone: 7342462280 Email: <a href="mailto:jcarmody@waynemetrol.org">jcarmody@waynemetrol.org</a>
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**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
04/16/2023	Lansing State Journal: 3/10/23 Marquette Mining Journal: 3/9/23 Oakland Press: 3/10/23

**IV.7 Miscellaneous**

**Recipient Business Officer**  
Kris Schoenow, Executive Director  
Bureau of Community Action and Economic Opportunity  
Michigan Department of Human Services  
235 S Grand Ave. Ste. 204  
Lansing, MI 48933  
(517)388-3085  
[SchoenowK@michigan.gov](mailto:SchoenowK@michigan.gov)

**Recipient Principal Investigator**  
Alexandria Mehls, Weatherization Specialist  
Bureau of Community Action and Economic Opportunity  
Michigan Department of Human Services  
235 S Grand Ave. Ste. 204  
Lansing, MI 48933  
517-898-2098  
[MehlsA@michigan.gov](mailto:MehlsA@michigan.gov)

**Subgrantee Allocation / Territory Notes:**

FiveCAP opted to relinquish the WAP during PY22, after the MI State Plan was submitted. FiveCAP is listed as \$0 in the annual file rather than removing the subgrantee during the project period. FiveCAP did not operate the WAP in PY23. FiveCAP CAA operates in four counties, Mason, Manistee, Lake and Newaygo. Weatherization services in Mason, Lake and Newaygo are provided by Mid-Michigan CAA and services in Manistee are provided by Northwest Michigan CAA.

Saginaw County CAC opted to relinquish running the WAP during PY23. Mid-Michigan CAA was selected as the interim provider for the territory, and has begun providing services in Saginaw County in PY23 and will continue in PY24. Saginaw County CAC is listed as \$0 in the annual file rather than removing the subgrantee during the project period.

GCCARD is currently in transition to move to an outreach and intake program model while the job management and wx services will be completed by a neighboring CAA for an interim period. This interim plan will likely be in place for 3 years in order to determine what the long term plan will be for the WAP in Genesee County.

There are no new subgrantees added for PY24.

**Average Cost Per Unit (ACPU)**  
Michigan utilizes the maximum average cost per unit allowable by DOE. A few Subgrantees experience high counts of poor housing stock that lead to high cost completions or deferrals which results in a higher ACPU. As inflation has increased, more and more agencies have struggled to balance their maximum allowable ACPU. Recently we have heard anecdotally that they have to place more homes on hold than in the past to maintain their ACPU in hopes of addressing the higher cost jobs next year.

**Other Funding Sources for WAP**  
Low Income Energy Assistance Program (LIHEAP) funds are not allocated at the level they are in most other states to the MI WAP. The funding period for



**U.S. Department of Energy**  
Weatherization Assistance Program (WAP)  
WEATHERIZATION ANNUAL FILE WORKSHEET  
**Grant Number:** EE0009909, **State:** MI, **Program Year:** 2024  
**Recipient:** State of Michigan

LIHEAP is different than DOE. DOE grant period is 7/1 - 6/30. The LIHEAP grant period is 10/1 - 9/30. At the time of plan submission, there is a floor amount of \$6,000,000 annually to be allocated to the Michigan WAP for FY25 (10/1/2024 - 9/30/2025). In FY24, there was a one time increase of LIHEAP funds of \$5.108M for a total of \$11.108M in the Michigan WAP. Still this is a much lower level of braided funds than most states' WAPs and our state feels the limitations heavily with the ACPU and SIR restrictions.

**Health & Safety Policy - Ventilation**

Michigan will use ASHRAE 62.2 2016 for DOE funded units and will comply with WPN 22-7 for Health and Safety policy.

**DOE Extended Measure Lifetimes**

Michigan has received approval from DOE on extended measure lifetimes as guided in WPN 23-6. Michigan implemented these extended lifetimes in PY19 and continues to utilize them.

**DOE WAP Materials**

As outlined in WPN 23-6, Michigan has received approval from DOE to utilize LED bulbs, two part sprayfoam as insulation, refrigerators and water heaters in WAP dwellings.

**Subgrantees in PY24**

Michigan ran an RFP to include a statewide multifamily provider beginning in the BIL grant, with the potential to be added to the formula grant. The provider selected on April 7, 2023 was ICAST. The RFP plans to have that provider begin May 1, 2023 in BIL. ICAST will operate under BIL in PY24 with the potential of allocation formula funds as determined by Michigan. Saginaw County Community Action Committee relinquished their program during PY24. An interim provider has been selected to cover the territory. The entire state is covered (each county is covered by one agency). Five subgrantees are under corrective action plans, working to rebuild the program. A potential outcome is loss of the program.

Additionally, with stimulus funding planned, the limitations of individual agencies and delays caused by the pandemic, BCAEO is considering to adding additional single family Subgrantees to our program. This will require an RFP process. We are aware that if we do, we would need to amend the state plan first and work with DOE to add the organization(s), and that the organization(s) would need to meet the requirements of 10 CFR 440.15 and 2 CFR 200.93.

**BUDGET INFORMATION - Non-Construction Programs**

1. Program/Project Identification No. EE0009909		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address State of Michigan P.O. Box 30195 Lansing, MI 489097695		4. Program/Project Start Date 07/01/2024	5. Completion Date 06/30/2025

**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	\$ 4,617,693.00		\$ 21,860,318.00		\$ 26,478,011.00
2.						
3.						
4.						
5. TOTAL		\$ 4,617,693.00	\$ 0.00	\$ 21,860,318.00	\$ 0.00	\$ 26,478,011.00

**SECTION B - BUDGET CATEGORIES**

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) GRANTEE ADMINISTRATI ON	(2) SUBGRANTEE ADMINISTRATI ON	(3) GRANTEE T&TA	(4) SUBGRANTEE T&TA	
a. Personnel	\$ 667,047.00	\$ 0.00	\$ 124,561.00	\$ 0.00	\$ 791,608.00
b. Fringe Benefits	\$ 442,399.00	\$ 0.00	\$ 65,482.00	\$ 0.00	\$ 507,881.00
c. Travel	\$ 58,400.00	\$ 0.00	\$ 66,476.00	\$ 0.00	\$ 124,876.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 77,036.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 77,036.00
f. Contract	\$ 299,998.00	\$ 2,039,523.00	\$ 2,225,706.00	\$ 1,400,000.00	\$ 24,881,968.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 94,642.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 94,642.00
i. Total Direct Charges	\$ 1,639,522.00	\$ 2,039,523.00	\$ 2,482,225.00	\$ 1,400,000.00	\$ 26,478,011.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
k. Totals	\$ 1,639,522.00	\$ 2,039,523.00	\$ 2,482,225.00	\$ 1,400,000.00	\$ 26,478,011.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

**BUDGET INFORMATION - Non-Construction Programs**

1. Program/Project Identification No. EE0009909		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address State of Michigan P.O. Box 30195 Lansing, MI 489097695		4. Program/Project Start Date 07/01/2024	5. Completion Date 06/30/2025

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		\$ 4,617,693.00	\$ 0.00	\$ 21,860,318.00	\$ 0.00	\$ 26,478,011.00

SECTION B - BUDGET CATEGORIES						
6. Object Class Categories	Grant Program, Function or Activity					Total (5)
	(1) PROGRAM OPERATIONS	(2) HEALTH AND SAFETY	(3) LIABILITY INSURANCE	(4) FINANCIAL AUDITS		
a. Personnel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 791,608.00	
b. Fringe Benefits	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 507,881.00	
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 124,876.00	
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 77,036.00	
f. Contract	\$ 11,728,983.00	\$ 4,099,280.00	\$ 76,041.00	\$ 31,803.00	\$ 24,881,968.00	
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 94,642.00	
i. Total Direct Charges	\$ 11,728,983.00	\$ 4,099,280.00	\$ 76,041.00	\$ 31,803.00	\$ 26,478,011.00	
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	
k. Totals	\$ 11,728,983.00	\$ 4,099,280.00	\$ 76,041.00	\$ 31,803.00	\$ 26,478,011.00	
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	

**BUDGET INFORMATION - Non-Construction Programs**

1. Program/Project Identification No. EE0009909		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address State of Michigan P.O. Box 30195 Lansing, MI 489097695		4. Program/Project Start Date 07/01/2024	5. Completion Date 06/30/2025

**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		\$ 4,617,693.00	\$ 0.00	\$ 21,860,318.00	\$ 0.00	\$ 26,478,011.00

**SECTION B - BUDGET CATEGORIES**

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) VEHICLES AND EQUIPMENT	(2) LEVERAGING	(3) Weatherization Readiness	(4)	
a. Personnel	\$ 0.00	\$ 0.00	\$ 0.00		\$ 791,608.00
b. Fringe Benefits	\$ 0.00	\$ 0.00	\$ 0.00		\$ 507,881.00
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00		\$ 124,876.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00		\$ 0.00
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00		\$ 77,036.00
f. Contract	\$ 100,000.00	\$ 0.00	\$ 2,880,634.00		\$ 24,881,968.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00		\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00		\$ 94,642.00
i. Total Direct Charges	\$ 100,000.00	\$ 0.00	\$ 2,880,634.00		\$ 26,478,011.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00		\$ 0.00
k. Totals	\$ 100,000.00	\$ 0.00	\$ 2,880,634.00		\$ 26,478,011.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00		\$ 0.00