

State of Alabama

UNITED STATES DEPARTMENT OF ENERGY
PROGRAM YEAR 2024
WEATHERIZATION ASSISTANCE PROGRAM
STATE PLAN

(April 1, 2024 – March 31, 2025)



Submitted by:

State of Alabama
Kay Ivey, Governor

Department of Economic and Community Affairs
Kenneth W. Boswell, Director

OVERVIEW

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Introduction

This document is the 2024 Alabama Weatherization Assistance Program (WAP) State Plan. The project period is April 1, 2024 to March 31, 2025.

The Alabama Department of Economic and Community Affairs (ADECA) is the State administrating authority for the WAP. A network of twelve (12) community action agencies, and one (1) regional planning and development commission delivers residential energy efficiency and health and safety solutions for all 67 counties in the State. The mission of the program is to reduce energy costs for low-income families, particularly for the elderly, people with disabilities, and children, by improving the energy efficiency of their homes while ensuring their health and safety.

The WAP State Plan is an application package that is required for state agencies applying for grants administered by the U.S. Department of Energy (DOE) Weatherization and Intergovernmental Program under the Weatherization Assistance Program for Low-Income Persons.

The WAP State Plan grant application components are divided into two files, the Annual File and Master File. The Annual File consists of the components that change annually, e.g., budget, production schedule, training and technical assistance activities. The Master File consists of the components that are generally unchanged from the previous year, e.g., state’s climatic conditions, the extent to which priority will be given to the weatherization of single-family or other high energy consuming dwelling units.

Under the authority of Weatherization Program Notice (WPN) 24-1, ADECA is presenting Program Year 2023 allocations for planning purposes for the 2024 Program Year. Final WAP allocations may differ from the planning numbers presented in this package reflected in WPN 24-2. Once final Program Year 2024 allocations are released, the State Plan will be updated to reflect the correct award amount.

Proposed adjusted average expenditure per dwelling.....	\$7,756.57
Health and Safety average expenditure per home remains.....	\$1,412.55

- Average Cost Per Unit for this Program Year is set at \$8,497.00
- Quality Control Inspector final inspection is required.
- Training and Technical assistance funds are available to obtain certification and receive required CEU through the State T&TA Coordinators at the Alabama Community College System. Some T&TA funding will still be awarded to subrecipients to allow for internal conference attendance outside of the ACCS’s Training Plan.
- Total administrative limit is 15%
- Reweatherization is a rolling 15 Year date

APPLICATION FOR FEDERAL ASSISTANCE SF-424

Version 02

1. Type of Submission:		2. Type of Application:		If Revision, select appropriate letter(s)	
<input type="checkbox"/> Preapplication		<input type="checkbox"/> New		Increase Award	
<input checked="" type="checkbox"/> Application		<input checked="" type="checkbox"/> Continuation		Other (specify):	
<input type="checkbox"/> Changed/Corrected Application		<input type="checkbox"/> Revision			
3. Date Received 12/16/2022			4. Applicant Identifier:		
5a. Federal Entity Identifier:			5b. Federal Award Identifier: DE-EE0009885		
State Use Only:					
6. Date Received by State: 12/16/2022			7. State Application Identifier:		
8. APPLICANT INFORMATION:					
a. Legal Name: State of Alabama					
b. Employer/Taxpayer Identification Number (EIN/TIN): 636000619			c. UEI: PQ3LJB9LMX63		
d. Address:					
Street 1: 401 Adams Avenue - Suite 560					
Street 2: P.O. Box 5690					
City: Montgomery					
County: MONTGOMERY County					
State: AL					
Province:					
Country: U.S.A.					
Zip / Postal Code: 361035690					
e. Organizational Unit:					
Department Name: ADECA			Division Name: Energy		
f. Name and contact information of person to be contacted on matters involving this application:					
Prefix: Mr First Name: Derek					
Middle Name:					
Last Name: Wilson					
Suffix:					
Title: State Weatherization Program Administrator					
Organizational Affiliation: State of Alabama - Dept of Economic and Community Affairs					
Telephone Number: 3342425373			Fax Number:		
Email: derek.wilson@adeca.alabama.gov					

APPLICATION FOR FEDERAL ASSISTANCE SF-424

Version 02

Province**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:

Not applicable

Title:

Not applicable

14. Areas Affected by Project (Cities, Counties, States, etc.):

Alabama - Statewide

15. Descriptive Title of Applicant's Project:

Weatherization Assistance Program For Low-Income Persons

APPLICATION FOR FEDERAL ASSISTANCE SF-424

Version 02

Province**16. Congressional District Of:**

a. Applicant: Alabama Congressional District 02

b. Program/Project: AL-Statewide

Attach an additional list of Program/Project Congressional Districts if needed:**17. Proposed Project:**

a. Start Date: 04/01/2024

b. End Date: 03/31/2025

18. Estimated Funding (\$):

a. Federal	3,751,476.00
b. Applicant	0.00
c. State	0.00
d. Local	0.00
e. Other	0.00
f. Program Income	0.00
g. TOTAL	3,751,476.00

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: Kenneth

Middle Name: W.

Last Name: Boswell

Suffix:

Title: Director

Telephone Number: 3342425591

Fax Number:

Email: Kenneth.Boswell@adeca.alabama.gov

Signature of Authorized Representative: Signed Electronically

Date Signed: 03/28/2024

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0009885		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address State of Alabama 401 Adams Avenue - Suite 560 Montgomery, AL 361035690		4. Program/Project Start Date 04/01/2024	5. Completion Date 03/31/2025

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. 2023 WAP Formula Funds	81.042	\$ 542,195.00		\$ 3,751,476.00		\$ 4,293,671.00
2.						
3.						
4.						
5. TOTAL		\$ 542,195.00	\$ 0.00	\$ 3,751,476.00	\$ 0.00	\$ 4,293,671.00

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) GRANTEE ADMINISTRATIONS	(2) SUBGRANTEE ADMINISTRATIONS	(3) GRANTEE T&TA	(4) SUBGRANTEE T&TA	
a. Personnel	\$ 17,388.00	\$ 0.00	\$ 86,850.00	\$ 0.00	\$ 104,238.00
b. Fringe Benefits	\$ 7,468.00	\$ 0.00	\$ 36,483.00	\$ 0.00	\$ 43,951.00
c. Travel	\$ 0.00	\$ 0.00	\$ 24,310.00	\$ 0.00	\$ 24,310.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 0.00	\$ 0.00	\$ 2,500.00	\$ 0.00	\$ 2,500.00
f. Contract	\$ 0.00	\$ 349,972.00	\$ 305,567.00	\$ 48,000.00	\$ 3,971,605.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 35,000.00
i. Total Direct Charges	\$ 24,856.00	\$ 349,972.00	\$ 455,710.00	\$ 48,000.00	\$ 4,181,604.00
j. Indirect Costs	\$ 112,067.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 112,067.00
k. Totals	\$ 136,923.00	\$ 349,972.00	\$ 455,710.00	\$ 48,000.00	\$ 4,293,671.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0009885		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address State of Alabama 401 Adams Avenue - Suite 560 Montgomery, AL 361035690		4. Program/Project Start Date 04/01/2024	5. Completion Date 03/31/2025

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		\$ 542,195.00	\$ 0.00	\$ 3,751,476.00	\$ 0.00	\$ 4,293,671.00

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	\$ 104,238.00	
b. Fringe Benefits	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 43,951.00	
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 24,310.00	
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 2,500.00	
f. Contract	\$ 2,326,972.00	\$ 423,765.00	\$ 34,600.00	\$ 32,800.00	\$ 3,971,605.00	
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 35,000.00	\$ 0.00	\$ 35,000.00	
i. Total Direct Charges	\$ 2,326,972.00	\$ 423,765.00	\$ 69,600.00	\$ 32,800.00	\$ 4,181,604.00	
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 112,067.00	
k. Totals	\$ 2,326,972.00	\$ 423,765.00	\$ 69,600.00	\$ 32,800.00	\$ 4,293,671.00	
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0009885	2. Program/Project Title Weatherization Assistance Program
3. Name and Address State of Alabama 401 Adams Avenue - Suite 560 Montgomery, AL 361035690	4. Program/Project Start Date 04/01/2024
	5. Completion Date 03/31/2025

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		\$ 542,195.00	\$ 0.00	\$ 3,751,476.00	\$ 0.00	\$ 4,293,671.00

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) Weatherization Readiness	(2)	(3)	(4)	
a. Personnel	\$ 0.00				\$ 104,238.00
b. Fringe Benefits	\$ 0.00				\$ 43,951.00
c. Travel	\$ 0.00				\$ 24,310.00
d. Equipment	\$ 0.00				\$ 0.00
e. Supplies	\$ 0.00				\$ 2,500.00
f. Contract	\$ 449,929.00				\$ 3,971,605.00
g. Construction	\$ 0.00				\$ 0.00
h. Other Direct Costs	\$ 0.00				\$ 35,000.00
i. Total Direct Charges	\$ 449,929.00				\$ 4,181,604.00
j. Indirect Costs	\$ 0.00				\$ 112,067.00
k. Totals	\$ 449,929.00				\$ 4,293,671.00
7. Program Income	\$ 0.00				\$ 0.00

U.S. DEPARTMENT OF ENERGY



BUDGET JUSTIFICATION FOR FORMULA GRANTS

Applicant: State of Alabama
Award number: EE0009885

Budget period: 04/01/2024 - 03/31/2025

1. PERSONNEL - Prime Applicant only (all other participant costs are listed in 6 below and form SF-242A, Section B. Line 6.f. Contracts and Sub-Grants).

Positions to be supported under the proposed award and brief description of the duties of professionals:

<u>Position</u>	<u>Description of Duties of Professionals</u>
Technical Lead	Serves as Technical Lead The Weatherization Program Technical Lead position is responsible for the technical responsibilities of the program. As Technical Lead, this person will monitor the units, compile field review reports, and provide technical guidance to the Program Supervisor. The balance of salary and benefits is paid using 2024 DOE funds, WAPBIL funds, and 2024 LIWAP funds.
Planning & Economic Development Specialist III - DW	Serves as the Weatherization Program Supervisor The Weatherization Program Supervisor is responsible for preparing and submitting all required federal reports, creating, implementing, and enforcing programmatic plans for the State's Subrecipients, developing State Plans, scheduling and conducting public hearings, and assembling the grant budget. The balance of salary and benefits is paid using 2024 DOE funds (T&TA and Admin), WAPBIL funds, and 2024 LIWAP funds.
Planning & Economic Development Specialist IV - NN	Serves as Community Services Unit Chief The Community Services Unit Chief is responsible for the supervision of the LIHEAP, CSBG, and Weatherization Programs. The balance of salary and benefits is paid using 2024 DOE funds, WAPBIL funds, 2024 LIWAP funds, LIHEAP funds, and CSBG funds.
Planning & Economic Development Specialist I - LC	Serves as Weatherization Program Manager which is responsible for one-half of the state's subrecipients. As Program Manager, this person will monitor the agencies for which they are responsible annually, compile field review reports and monthly subrecipient production reports, and provide on-site or virtual T&TA as needed. The balance of salary and benefits is paid using 2024 DOE funds, BIL funds, and 2024 LIWAP funds.
Planning & Economic Development Specialist I - JM	Serves as Weatherization Program Manager which is responsible for one-half of the State's Subrecipients. As Program Manager, this person will monitor the agencies for which they are responsible annually, compile field review reports and monthly subrecipient production reports, and provide on-site or virtual T&TA as needed. The balance of salary and benefits is paid using 2024 DOE funds, BIL funds, and 2024 LIWAP funds.
Administrative Support Assistant I	Serves as an Administrative Support Assistant to Weatherization Program Staff The Administrative Support Assistant provides general administrative assistance, including but not limited to, assisting in coordinating training sessions and meetings, preparing correspondence, and directing client phone calls to the appropriate staff. The balance of salary and benefits is paid using 2024 DOE funds, WAPBIL funds, 2024 LIWAP funds, LIHEAP funds, CSBG funds, and other non-WAP funds.

Direct Personnel Compensation:

<u>Position</u>	<u>Salary/Rate</u>	<u>Time</u>	<u>Direct Pay</u>
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Technical Lead	\$71,083.20	39.9995 % FT	\$28,432.92
Planning & Economic Development Specialist III - DW	\$59,865.60	39.9993 % FT	\$23,945.82
Planning & Economic Development Specialist IV - NN	\$69,331.20	14.9994 % FT	\$10,399.26
Planning & Economic Development Specialist I - LC	\$52,992.00	39.9992 % FT	\$21,196.38
Planning & Economic Development Specialist I - JM	\$39,484.80	39.9990 % FT	\$15,793.53
Administrative Support Assistant I	\$35,748.72	12.5042 % FT	\$4,470.09
		Direct Pay Total	\$104,238.00

2. FRINGE BENEFITS

- a. Are the fringe cost rates approved by a Federal Agency? If so, identify the agency and date of latest rate agreement or audit below, and attach a copy of the rate agreement to the application.

- b. If a. above does not apply, please use this box (or an attachment) to further explain how your total fringe benefits costs were calculated. Your calculations should identify all rates used, along with the base they were applied to (and how the base was derived), and a total for each (along with grand total). If there is an established computation methodology approved for state-wide use, please provide a copy. Also, please fill out the table below with the Fringe Benefits Calculations.

FICA: April 2024 - March 2025: 7.65%

Retirement: (RSA Tier 2) 14.44%

Health Insurance: \$930.00/month = \$11,160.00/year

PEDS IV: 11,160 (15%) = \$1,674.00 / \$10,399.26 = 16.0972%

PEDS III: 11,160 (40%) = \$4,464.00 / \$23,945.82 = 18.6420%

PEDS I: 11,160 (40%) = \$4,464.00 / \$15,793.53 = 28.2647%

PEDS II: 11,160 (40%) = \$4,464.00 / \$21,196.38 = 21.0601%

Technical Lead: 11,160 (40%) = \$4,464.00 / \$28,432.92 = 15.7001%

ASA I: 11,160 (12.5%) = \$1,395.00 / \$4,470.09 = 31.2074%

Average Fringe Rate = 52.7023%

* Unemployment Insurance and Workmans' Compensation is not included in the budget.

Fringe Benefits Calculations

<u>Position</u>	<u>Direct Pay</u>	<u>Rate</u>	<u>Benefits</u>
Technical Lead	\$28,432.92	37.7899 %	\$10,744.77
Planning & Economic Development Specialist III - DW	\$23,945.82	40.7318 %	\$9,753.56
Planning & Economic Development Specialist IV - NN	\$10,399.26	38.1866 %	\$3,971.12
Planning & Economic Development Specialist I - LC	\$21,196.38	43.1498 %	\$9,146.20
Planning & Economic Development Specialist I - JM	\$15,793.53	50.3540 %	\$7,952.67
Administrative Support Assistant I	\$4,470.09	53.3079 %	\$2,382.91
		Fringe Benefits Total	\$43,951.23

3. TRAVEL

- a. Please provide the purpose of travel, such as professional conference(s), DOE sponsored meeting(s), project management meeting, etc. If there is any foreign travel, please identify.

<u>Purpose of Trip</u>	<u>Number of Trips</u>	<u>Cost Per Trip</u>	<u>Total</u>
Monitoring and T&TA - Fuel	30	\$100.00	\$3,000.00
Monitoring and/or T&TA - Day Trips Per Diem (less than 6 hours)	2	\$0.00	\$0.00

Monitoring and/or T&TA - Day Trips Per Diem (6+ hours)	40	\$12.75	\$510.00
Out of State Travel for Conferences, Training, etc.	4	\$3,200.00	\$12,800.00
Monitoring and/or T&TA - Overnight Per Diem	20	\$400.00	\$8,000.00
		Travel Total	\$24,310.00

- b. Please provide the basis for estimating the costs, such as past trips, current quotations, Federal Travel Regulations, etc. All listed travel must be necessary for the performance of the award objectives.

All travel estimated number of trips and costs are based on historical data and comply with all State of Alabama travel and reimbursement policies. The State of Alabama in-state travel per diem guidelines are as follows:

\$12.75/day 6+ hours at least 25 miles from base

\$34.00/day 6-12 hours but not overnight

\$85.00/night for one night

\$100.00/night for 2+ nights

Monitoring and T&TA - Fuel: Estimates are based on traveling 15,000 miles over the course of the grant cycle. We estimate that our vehicles will average 16 miles per gallon and the per gallon cost of fuel is \$3.20.

Monitoring and/or T&TA - Overnight Per Diem: Estimates are based on making 20 4-night trips throughout the grant cycle.

Monitoring and/or T&TA - Day Trips Per Diem (6+ hours): Estimates are based on making 40 1-day trips throughout the grant cycle.

Monitoring and/or T&TA - Day Trips Per Diem (less than 6 hours): Estimates are based on making 2 partial day trips throughout the grant cycle.

Out of State Travel for Conferences, Trainings, etc.: Estimates are based off of making 4 out-of-state trips to attend conferences such as NASCSP, Energy Out West, Home Performance Coalition, or similar. We estimate that registration will be \$900.00 per person, lodging will be \$1,000.00, airfare will be \$900.00, and M&IE will be \$400.00. Lodging and M&IE are subject to GSA.gov restrictions.

4. EQUIPMENT - Equipment is generally defined as an item with an acquisition cost greater than \$5,000 and a useful life expectancy of more than one year.

- a. List all proposed equipment below and briefly justify its need as it applies to the objectives of the award.

<u>Equipment</u>	<u>Unit Cost</u>	<u>Number</u>	<u>Total Cost</u>	<u>Justification of Need</u>
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- b. Please provide a basis of cost such as vendor quotes, catalog prices, prior invoices, etc. and justify need. If the Equipment is being proposed as Cost Share and was previously acquired, please provide the source and value of its contribution to the project and logical support for the estimated value shown. If it is new equipment which will retain a useful life upon completion of the project, provide logical support for the estimated value shown. Also, please indicate whether the Equipment is being used for other projects or is 100% dedicated to the DOE project.

5. SUPPLIES - Supplies are generally defined as an item with an acquisition cost of \$5,000 or less and a useful life expectancy of less than one year. Supplies are generally consumed during the project performance.

- a. List all proposed supplies below, the estimated cost, and briefly justify the need for the supplies as they apply to the objectives of the award. Note that all direct costs, including Supply items, may not be duplicative of supply costs included in the indirect pool that is the basis of the indirect rate applied for this project.

General Category	Cost	Justification of Need
Calibration of Testing Equipment	\$1,000.00	Calibration of testing equipment to ensure accurate readings.
Materials for Training Events	\$1,000.00	Materials such as binders, folders, markers, boards, etc. for training purposes.
Tools and Supplies	\$500.00	Various small tools and supplies needed to conduct monitoring activities.
Materials and Supplies Total	\$2,500.00	

- b. Please provide a basis of cost for each item listed above and justify need. Examples include vendor quotes, prior purchases of similar or like items, published price list, etc.

Cost estimated on historical prices and researched estimates.

6. CONTRACTS AND SUBGRANTS - Provide the following information for New proposed subrecipients and subcontractors. For ongoing subcontractors and subrecipients, this information does not have to be restated here, if it is provided elsewhere in the application; under Name of Proposed Sub, indicate purpose of work and where additional information can be found (i.e weatherization subgrants, Annual File section IV.1).

Name of Proposed Sub	Total Cost	Basis of Cost*
EIS Data LLC	\$55,567.00	DBA Technologies LLC - maintenance agreement renewal for database management used by CSBG, LIHEAP, LIHWAP, and WAP.
Weatherization Subrecipients (Annual File section IV.1)	\$3,666,038.00	This includes allocations for: administration, program operations, health and safety, liability insurance, training and technical assistance, financial audit, vehicles and equipment (none in 2024), and weatherization readiness funds. ADECA has determined, through historical data, that the amount budgeted for subrecipient administrative costs is sufficient for effectively implementing the administrative requirements of this grant project. In accordance with 2 CFR 200.425(a)(2), only those subrecipients expending more than \$750,000.00 in total Federal Funds annually will receive funding for an allocated portion of the agency's financial audit identified in the Grantee's SF-424a Budget.
QCI Contractor	\$250,000.00	This includes funds to acquire and maintain a QCI certified contractor(s) to assist the State Administering Agency with technical monitoring requirements.
Contracts and Subgrants Total	\$3,971,605.00	

*For example, Competitive, Historical, Quote, Catalog

7. OTHER DIRECT COSTS - Other direct costs are direct cost items required for the project which do not fit clearly into other categories. These direct costs may not be duplicative of costs included in the indirect pool that is the basis of the indirect rate applied for this project. Examples are: conference fees, subscription costs, printing costs, etc.

- a. Please provide a General Description, Cost and Justification of Need.

General Description	Cost	Justification of Need
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Pollution Occurrence Insurance	\$35,000.00	To insure recipient (SAA) and subrecipients from liability related to claims related to pollution occurrence incidents.
Other Direct Costs Total	\$35,000.00	

- b. Please provide a basis of cost for each item listed above. Examples include vendor quotes, prior purchases of similar or like items, published price list, etc.

\$35,000.00 has been budgeted for Pollution Occurrence Insurance, which will be purchased by the State to cover all subrecipients. The estimate expense is based on what was spent in previous years. All cost included in Other Costs are properly segregated from Indirect costs, meaning they are segregated in the financial system by accounting code or GA ledger number. All costs proposed are utilized strictly in support of the WAP program.

8. INDIRECT COSTS

- a. Are the indirect cost rates approved by a Federal agency? If so, identify the agency and date of latest rate agreement or audit and provide a copy of the rate agreement.

The latest agreement for the provisional indirect cost rate was made on September 1, 2023. The agreement was made between the United States Department of Labor, the Federal Cognizant Agency and the Alabama Department of Economic and Community Affairs.

- b. If the above does not apply, indicate the basis for computation of rates, including the types of benefits to be provided, the rate(s) used, and the cost base for each rate. You may provide the information below or provide the calculations separately.

The name and phone number of the individual responsible for negotiating the State's indirect cost rates.

Name: Emily Wen Phone Number: 2026934107

Indirect costs calculations:

<u>Indirect Cost Account</u>	<u>Direct Total</u>	<u>Indirect Rate</u>	<u>Total Indirect</u>
Provisional - ADECA-ED (Energy Division) 10/01/2023 - 09/30/2024	\$4,181,604.00	2.6800 %	\$112,066.99
		Indirect Costs Total	\$112,066.99

U.S. Department of Energy
Weatherization Assistance Program (WAP)
WEATHERIZATION ANNUAL FILE WORKSHEET
Grant Number: EE0009885, State: AL, Program Year: 2024
Recipient: State of Alabama

IV.1 Subgrantees

Subgrantee (City)	Planned Funds/Units
Alabama Council on Human Relations, Inc. (Auburn)	\$142,892.60 12
Central Alabama Regional Planning and Development Commission (CARPDC) (Montgomery)	\$327,280.85 27
Community Action Agency of Northeast Alabama, Inc (Rainsville)	\$855,942.05 71
Community Action Agency of Northwest Alabama, Inc. (Florence)	\$142,025.05 11
Community Action Agency of South Alabama, Inc. (Daphne)	\$243,351.00 20
Community Action Agency of Talladega, Clay, Randolph, Calhoun and Cleburne Counties (Talladega)	\$214,007.35 17
Community Action Committee, Inc. of Chambers-Tallapoosa-Coosa (Dadeville)	\$76,375.30 6
Community Action Partnership of Huntsville/ Madison and Limestone Counties, Inc. (Huntsville)	\$229,956.45 19
Community Action Partnership of North Alabama, Inc. (Decatur)	\$254,405.55 21
Community Service Programs of West Alabama, Inc (Tuscaloosa)	\$249,214.00 20
Mobile Community Action, Inc. (Mobile)	\$362,887.50 30
Montgomery County Commission, c/o Central Alabama Regional Planning and Development Commission (Montgomery)	\$218,748.90 18
Organized Community Action Program, Inc. (Troy)	\$348,951.40 28
Total:	\$3,666,038.00 300

IV.2 WAP Production Schedule

Weatherization Plans		Units
Total Units (excluding reweatherized)		300
Reweatherized Units		0
Average Unit Costs, Units subject to DOE Project Rules		
VEHICLE & EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)		
A	Total Vehicles & Equipment (\$5,000 or more) Budget	\$0.00
B	Total Units Weatherized	300
C	Total Units Reweatherized	0
D	Total Dwelling Units to be Weatherized and Reweatherized (B + C)	300
E	Average Vehicles & Equipment Acquisition Cost per Unit (A divided by D)	\$0.00
AVERAGE COST PER DWELLING UNIT (DOE RULES)		
F	Total Funds for Program Operations	\$2,326,972.00
G	Total Dwelling Units to be Weatherized and Reweatherized (from line D)	300

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H	Average Program Operations Costs per Unit (F divided by G)	\$7,756.57
I	Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$0.00
J	Total Average Cost per Dwelling (H plus I)	\$7,756.57

IV.3 Energy Savings

Method used to calculate savings: WAP algorithm Other (describe below)

	Units	Savings Calculator (MBtus)	Energy Savings
This Year Estimate	300	29.3	8790
Prior Year Estimate	400	29.3	11720
Prior Year Actual	342	29.3	10021

Method used to calculate savings description:

IV.4 DOE-Funded Leveraging Activities

LEVERAGING ACTIVITIES

Low-Income Home Energy Assistance Program (LIHEAP) funds are provided through the U.S. Department of Health and Human Services. LIHEAP funds can be used in conjunction with DOE funds. LIHEAP funds will be available for weatherization activities in this Program Year.

In accordance with 440.14 (b)(9)(xiv), The State of Alabama encourages Subrecipients to utilize private resources to increase the amount of assistance to eligible clients. No State funds are available for weatherization projects and since all Subrecipients are public or nonprofit entities they must rely solely on Federal Funds (LIHEAP and DOE).

IV.5 Policy Advisory Council Members

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

Mr. Antwon Prince-Sealy	Type of organization: Non-profit (not a financial institution) Contact Name: Mr. Antwon Prince-Sealy Phone: 2054690358 Email: aprince@cspwal.com
Mr. Cade Gunnells	Type of organization: Non-profit (not a financial institution) Contact Name: Cade Gunnells Phone: 3342624300 Email: cgunnells@carpdc.com
Mr. Kris Rowe	Type of organization: Non-profit (not a financial institution) Contact Name: Kris Rowe Phone: 2052277688 Email: krowe@caaalabama.org
Mr. Luke Laney	Type of organization: Non-profit (not a financial institution) Contact Name: Luke Laney Phone: 2566384430 Email: luke@caaneal.org
Mr. Scott Stabler	Type of organization: Unit of State Government Contact Name: Mr. Scott Stabler Phone: 3343538712 Email: scott.stabler@adss.alabama.gov
Ms Wendy Littles	Type of organization: Unit of State Government Contact Name: Wendy Littles Phone: 3343533375 Email: wendy.littles@adeca.alabama.gov
Ms. Aquilla Spivey	Type of organization: Unit of State Government Contact Name: Ms. Aquilla Spivey Phone: 3342425211

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Ms. Delores Mastin	Email: aquilla.spivey@psc.alabama.gov Type of organization: Non-profit (not a financial institution) Contact Name: Ms. Delores Mastin Phone: 2568519800 Email: dmastin@caa-htsval.org
Ms. Tanganyika Grayson	Type of organization: Utility Contact Name: Tanganyika Grayson Phone: 2052572357 Email: tgrayso@southernco.com

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
01/05/2024	Notice was posted on the Secretary of State website as required by the Alabama Open Meetings Act on December 29, 2023. Public hearing was held on January 5, 2024.
01/05/2024	The Tuscaloosa News ran ad for public hearing on December 18, 2023. The Decatur Daily/Hartselle Enquirer ran ad for public hearing on December 20, 2023. The Dothan Eagle and Montgomery Independent ran ad for public hearing on December 21, 2023.

IV.7 Miscellaneous

<p>Alabama entered into a Programmatic Agreement with the State Historic Preservation Office on April 6, 2010; this agreement was amended on December 7, 2020 and extended to December 31, 2030.</p> <p>Notices for Public Hearings are posted on the Secretary of State Website as required by the Open Meetings Act https://www.openmeetings.alabama.gov/generalpublic/display_notices.aspx Notice of Public Hearing was also posted in newspapers throughout the State. Notices are attached.</p> <p>Additionally subrecipients were notified of a public hearing by email and standard mail.</p> <p>Recipient Principal Investigator: Derek Wilson E-mail: derek.wilson@adeca.alabama.gov Phone: 334-242-5373</p> <p>Recipient Business Officer: Kenneth W. Boswell, Director E-mail: kenneth.boswell@adeca.alabama.gov Phone: 334-242-5594</p>

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SUBGRANTEE INFORMATION
 State: AL Grant Number: EE0009885 Program Year: 2024

<p>Name: Alabama Council on Human Relations, Inc.</p> <p>Address: 950 Shelton Mill Rd PO Drawer 3770 Auburn, AL 36831-0409</p> <p>Counties served: LEE County</p>	<p>Contact: Ms. Tina Evans UEI: NM15TJNTXJM8 DUNS: 183860386 Phone: (334) 821-8336 Fax: (334) 826-6397 Email: tina.evans@achr.com</p> <p>Tentative allocation: \$ 142,892.60 Planned units: 12 Type of organization: Non-profit organization Source of labor: Contractors</p>	<p>Congressional districts served: <u>CD</u> AL-03</p>
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<p>Name: Central Alabama Regional Planning and Development Commissio</p> <p>Address: 430 South Court Street Montgomery, AL 36104-4102</p> <p>Counties served: PERRY County AUTAUGA County SHELBY County RUSSELL County CHILTON County DALLAS County MACON County ELMORE County</p>	<p>Contact: Mr. Cade Gunnells UEI: TNC1GLG9Z6U6 DUNS: 781377734 Phone: (334) 262-4300 Fax: (334) 262-6976 Email: cgunnells@carpdc.com</p> <p>Tentative allocation: \$ 327,280.85 Planned units: 27 Type of organization: Non-profit organization Source of labor: Contractors</p>	<p>Congressional districts served: <u>CD</u> AL-02</p>
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<p>Name: Community Action Agency of Northeast Alabama, Inc</p> <p>Address: 1481 McCurdy Avenue, South PO Box 1487 Rainsville, AL 35986-1487</p> <p>Counties served: DEKALB County JEFFERSON County CHEROKEE County MARSHALL County ETOWAH County ST. CLAIR County BLOUNT County JACKSON County</p>	<p>Contact: Ms. Tyesha Yarbrough UEI: HSXZK11LPLJ5 DUNS: 948061619 Phone: (256) 638-4430 Fax: (256) 638-2039 Email: tyesha@caaneal.org</p> <p>Tentative allocation: \$ 855,942.05 Planned units: 71 Type of organization: Local agency Source of labor: Contractors</p>	<p>Congressional districts served: <u>CD</u> AL-04</p>
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WEATHERIZATION ASSISTANCE PROGRAM
SUBGRANTEE INFORMATION
State: AL Grant Number: EE0009885 Program Year: 2024

Name: Community Action Agency of Northwest Alabama, Inc.		Contact: Mr. Jay Hendricks
Address: 745 Thompson Street		UEI: TJGCN43BLB25
Florence, AL 35630-3867		DUNS: 135457047
Counties served: FRANKLIN County		Phone: (256) 383-3832
LAUDERDALE County		Fax: (256) 766-4367
COLBERT County		Email: j.hendricks@caanw.org
Tentative allocation: \$ 142,025.05		Congressional districts served: <u>CD</u>
Planned units: 11		AL-05
Type of organization: Local agency		
Source of labor: Contractors		

Name: Community Action Agency of South Alabama, Inc.		Contact: Mr. James McPherson
Address: 26440 Pollard Road		UEI: LJCFSSH88E1
PO Box 250		DUNS: 082145368
Daphne, AL 36526-0250		Phone: (251) 626-26461013
Counties served: MARENGO County		Fax: (251) 626-2613
MONROE County		Email: james.mcpherson@caaofsa.org
CLARKE County		Congressional districts served: <u>CD</u>
CONECUH County		AL-01
BALDWIN County		
WILCOX County		
ESCAMBIA County		
Tentative allocation: \$ 243,351.00		
Planned units: 20		
Type of organization: Local agency		
Source of labor: Contractors		

Name: Community Action Agency of Talladega, Clay, Randolph, Calhoun		Contact: Mr. Steinway Cash
Address: 136 North Court Street		UEI: KZEPNYBRARE9
PO Box 278		DUNS: 105370493
Talladega, AL 35161-0278		Phone: (256) 268-8042
Counties served: TALLADEGA County		Fax: (256) 474-0854
RANDOLPH County		Email: steinway@caatccc.org
CLEBURNE County		Congressional districts served: <u>CD</u>
CALHOUN County		AL-03
CLAY County		
Tentative allocation: \$ 214,007.35		
Planned units: 17		
Type of organization: Local agency		
Source of labor: Contractors		

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Name: Community Action Committee, Inc. of Chambers-Tallapoosa-Coos	Contact: Mr. Kevin Walker		
	UEI: G8RJR6L5LJK3		
Address: 170 South Broadnax Street	DUNS: 607565652		
Dadeville, AL 36853-1704	Phone: (256) 825-4287		
	Fax: (256) 825-4280		
	Email: kwalker@ctccac.com		
Counties served: TALLAPOOSA County	Tentative allocation: \$ 76,375.30	Congressional districts served:	<u>CD</u>
CHAMBERS County	Planned units: 6		AL-03
COOSA County	Type of organization: Non-profit organization		
	Source of labor: Contractors		

Name: Community Action Partnership of Huntsville/ Madison and Limes	Contact: Ms. YaShika Ray		
	UEI: KJ1KJ9J1MUD1		
Address: 3516 Stringfield Road, NW	DUNS: 078971595		
P.O. Box 3975	Phone: (256) 851-9800		
Huntsville, AL 35810-0975	Fax: (256) 851-9803		
	Email: yray@caa-htsval.org		
Counties served: LIMESTONE County	Tentative allocation: \$ 229,956.45	Congressional districts served:	<u>CD</u>
MADISON County	Planned units: 19		AL-05
	Type of organization: Local agency		
	Source of labor: Contractors		

Name: Community Action Partnership of North Alabama, Inc.	Contact: Ms. Angela Ingram		
	UEI: CWA3M48K2KQ3		
Address: 1909 Central Parkway, SW	DUNS: 082065335		
Decatur, AL 35601-6822	Phone: (256) 260-3116		
	Fax: (256) 355-7953		
	Email: angela.ingram@capna.org		
Counties served: CULLMAN County	Tentative allocation: \$ 254,405.55	Congressional districts served:	<u>CD</u>
MORGAN County	Planned units: 21		AL-04
MARION County	Type of organization: Local agency		
WINSTON County			
WALKER County			
LAWRENCE County	Source of labor: Contractors		

Name: Community Service Programs of West Alabama, Inc	Contact: Ms. Cynthia Burton		
	UEI: GKJYK54UUW87		
Address: 601 Black Bears Way	DUNS: 144583499		
Tuscaloosa, AL 35401-4807	Phone: (205) 469-1018		
	Fax: (205) 758-7229		
	Email: cburton@cspwal.com		

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WEATHERIZATION ASSISTANCE PROGRAM
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Counties served:	FAYETTE County GREENE County TUSCALOOSA County HALE County PICKENS County SUMTER County BIBB County LAMAR County	Tentative allocation: \$ 249,214.00 Planned units: 20 Type of organization: Local agency	Congressional districts served:	<u>CD</u> AL-07
Source of labor: Contractors				

Name:	Mobile Community Action, Inc.	Contact:	Mr. Tracy Rhodes	
		UEI:	YC9MUGJNF4Z4	
		DUNS:	049124688	
Address:	461 Donald St. Mobile, AL 36617-0000	Phone:	(251) 457-5700	
		Fax:	(251) 457-4113	
		Email:	trhodes@mcamobile.org	
Counties served:	WASHINGTON County MOBILE County CHOCTAW County	Tentative allocation: \$ 362,887.50 Planned units: 30 Type of organization: Local agency Source of labor: Contractors	Congressional districts served:	<u>CD</u> AL-01

Name:	Montgomery County Commission, c/o Central Alabama Regional	Contact:	Mr. Cade Gunnells	
		UEI:	G7V6WJZYK5G7	
		DUNS:	099839086	
Address:	430 S Court Street Montgomery, AL 36104-4102	Phone:	(334) 262-4300	
		Fax:	(334) 262-6976	
		Email:	cgunnells@carpdc.com	
Counties served:	MONTGOMERY County	Tentative allocation: \$ 218,748.90 Planned units: 18 Type of organization: Unit of local government Source of labor: Contractors	Congressional districts served:	<u>CD</u> AL-02

Name:	Organized Community Action Program, Inc.	Contact:	Ms. Annette Shepherd	
		UEI:	XM94E912XBN6	
		DUNS:	082060468	
Address:	507 North Three Notch Street Troy, AL 36081-0908	Phone:	(334) 566-1712	
		Fax:	(334) 566-7417	
		Email:	ashepherd@troycable.net	

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM
SUBGRANTEE INFORMATION
State: AL Grant Number: EE0009885 Program Year: 2024

Counties served:	HENRY County GENEVA County COFFEE County BARBOUR County BUTLER County LOWNDES County COVINGTON County CRENSHAW County HOUSTON County BULLOCK County DALE County PIKE County	Tentative allocation: \$ 348,951.40 Planned units: 28 Type of organization: Local agency	Congressional districts served:	<u>CD</u> AL-02
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Source of labor: Contractors

U.S. Department of Energy
Weatherization Assistance Program (WAP)
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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

General Description

Income data for the 12 months preceding the date of application is used. The State provides subrecipients with an "Application for Weatherization Assistance Form" containing information that must be obtained from prospective program participants before a decision can be made on their eligibility for weatherization assistance. All applicants are required to identify the amount and source of income for their household. In addition, they have to indicate whether they rent or own their home. All applicants are required to sign their application, testifying to the correctness of their statements. Falsification of an application is subject to prosecution. Income is defined as the items listed in Weatherization Program Notices (WPN) that dictate Poverty Income Guidelines.

To be eligible for WAP services, an applicant's family unit must have a gross annual household income at or below 200 percent of the poverty level as published by the U.S. Department of Health and Human Services, contain a member who has received cash assistance payments under Title IV or XVI of the Social Security Act or applicable State or local law at any time during the 12-month period preceding the determination of eligibility, or have received Low-Income Home Energy Assistance Program (LIHEAP) assistance at any time during the 12-month period preceding the determination of eligibility.

Describe what household eligibility basis will be used in the Program

To be eligible for WAP services, an applicant's family unit must have a gross annual household income at or below 200 percent of the poverty level as published by the U.S. Department of Health and Human Services, contain a member who has received cash assistance payments under Title IV or XVI of the Social Security Act or applicable State or local law at any time during the 12-month period preceding the determination of eligibility, or have received Low-Income Home Energy Assistance Program (LIHEAP) assistance at any time during the 12-month period preceding the determination of eligibility.

No dwelling unit may be weatherized without documentation that the dwelling unit is an eligible unit. A standard weatherization application is used by Subrecipients. This application requires that all household income be calculated, per DOE requirements. It also requires that income and home ownership is verified by Agency staff. Income Eligibility Limits will follow the 200% of poverty guidelines updated yearly in DOE Program Notices.

Subrecipients are required to maintain a signed weatherization program application in the clients file.

A record of previously weatherized dwelling units by address is maintained in the State's data management system. If the house is eligible for reweatherization, the subrecipient makes a determination whether or not to reweatherize the house based on a number of factors.

If weatherization services do not begin within 12 months of the eligibility determination date, the household's eligibility must be updated and reconfirmed.

Priorities are described in Section V.5.

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

Requirements for Qualified Aliens

A Qualified Alien is defined in 8 U.S.C. § 1641 and is eligible for weatherization if all other points of eligibility are met.

Additional information can also be found in *LIHEAP IM HHS Guidance on the Use of Social Security Numbers (SSNs) and Citizenship Status Verification Published December 12, 2014*

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

The State's data management system, utilized by all subrecipients, will require the intake worker to verify all members of a household to determine the number of priority points for the applicant (see below) and ages of members of the household. Household income documentation must be retained in the client file as well. Proof of ownership is required. If the unit is a rented unit, the owner/landlord must sign a rental release form which specifies that rent will not be raised solely due to the

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increased value because of weatherization and that no undue or excessive enhancement shall occur to the value of the dwelling. The State's data management system maintains weatherized addresses from 2002- present individual agencies may have additional records.

Describe Reweatherization compliance

Section 1011(h) of the Energy Act of 2020, amends 42 U.S. Code § 6865(c)(2) removing the reweatherization date, September 30, 1994, and create a "rolling" option.

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

The State's data management system tracks completed weatherized units and will be used to ensure that homes that have received weatherization assistance are not eligible to receive additional weatherization assistance using federal funds until at least 15 years after the date of completion. The system allows addresses to be searched to determine if a unit has received prior weatherization and the date of those services. Additionally, if an address has received previous weatherization then weatherization services will not appear as an eligible program for that applicant . To ensure accurate records of weatherized homes are maintained the use of the State's data management system will be required by all agencies during the Program Year. The FACSPRO system maintains weatherized addresses from 2002-present individual agencies may have additional records.

Describe what structures are eligible for weatherization

Structures eligible for weatherization include single family and manufactured housing. Non traditional dwelling units such as shelters, apartments over businesses, etc., will be discussed with, and if necessary, approved by the DOE Project Officer prior to weatherization. All structures must be stationary and have a specific mailing (street) address. Campers, non-stationary trailers, and storage buildings are not eligible.

Multi-Family units that are 4 units or less must use the Single Family Audit Tool (NEAT) .

Multi Family Units greater than 4 units must use a DOE approved Multi-Family Energy Audit. The audit will be submitted to the State who will submit it to DOE for review and approval before any work may be done.

Additionally, (NEAT) can be used for individually heated and cooled units under 25 units, in addition to sending to DOE for prior approval.

A programmatic agreement is chartered between DOE, the Advisory Council on Historic Preservation and the National Conference of State Historic Preservation Officers. The programmatic agreement works to eliminate a backlog of houses from unnecessary review and streamline the process of completing weatherization projects. Through this agreement DOE made the Advisory Council aware of what the specifics of the Weatherization Assistance Program are and that most measures do not alter the structure of homes. Based on the WAP Priority Measures list, this agreement exempts most of the measures performed through weatherization from Section 106 review. A list of these exempt measures was laid out in the appendices of the Programmatic Agreement.

Describe how Rental Units/Multifamily Buildings will be addressed

In order to insure the benefits of weatherization accrue primarily to the low income tenants, Subrecipients are required to have a Rental Release Form signed by the Client/Tenant and the Landlord/Owner.

This form allows the Subrecipients to perform weatherization work on the home and also prohibits the landlord/owner from raising the rent for a period of one year based solely on the increased value of the dwelling because of weatherization.

No undue or excessive enhancement shall occur to the value of the dwelling unit. A properly executed energy audit with an ECM of 1 or greater would not constitute an undue enhancement. The weatherization program is primarily an energy efficiency program not a home repair and rehabilitation program. Extensive repair and rehabilitation measures outside the scope of weatherization such as roof and siding replacement needed to avoid deferral of the home may be paid for with Weatherization Readiness Funding. Home improvement/beautification, etc. are not allowed with DOE funds.

Multi-family units may be weatherized. Multi family units are eligible if the following criteria are met. 50% of the units must be eligible for duplexes and four-unit buildings; 66% of the units must be income eligible to weatherize a multi-family unit with 3, 5, or more units.

Describe the deferral Process

See Deferral Policy which is part of Health and Safety Plan

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When a home is deferred for weatherization services the Subrecipient determines if another program housed within that Subrecipient or local to the area will be able to assist and correct deferral issues. If no program can be identified the client is referred to other sources, primarily the local office of the U.S. Department of Agriculture (USDA) and/or calling 211 Connects Alabama which is a directory for the United Way which can provide contact information for additional services.

Weatherization Assistance Program
Weatherization Readiness Fund (WRF) Plan

PURPOSE

The purpose for Weatherization Readiness Fund (WRF) is to reduce the frequency of deferred homes that require services that are outside the scope of weatherization before the weatherization services can commence. WRF will bring the dwelling into weatherization readiness by addressing structural and health and safety issues. The WRF will be distributed to the Subrecipients according to the formula historically used to distribute weatherization funds. Unspent WRFs can be carried forward into subsequent budget periods within the same grant cycle (e.g., Program Year (PY) 2022 can be carried into PY 2023) on a program level. Unspent WRFs must be returned to the WRF total which ADECA will reallocate according to the formula historically used to distribute weatherization funds.

WRF MAXIMUM

There is no definitive cap on the amount of WRFs the Subrecipients can spend to prepare a dwelling for weatherization, however an ACPU of \$8,000.00 specific to the use of WRF should be targeted. In addition, if a dwelling requires more than \$16,000.00, the dwelling must be deferred unless the Subrecipient has access to additional funds that they can combine with the WRFs. WAP BIL funds cannot be combined with WRF to pay for measures to avoid deferral.

While Subrecipients need the flexibility to assist clients to varying levels based on circumstance, it is important that as many deferrals as possible are avoided with the use of WRFs. In the event an \$8,000.00 ACPU is not met by the end of the program year, the Subrecipient must provide a justification explaining the circumstances that required an excess of \$8,000.00 be spent to avoid deferral.

PRIORITIZATION OF DWELLINGS

The Subrecipient must conduct a thorough inspection of the dwelling to identify all deferral issues. After clients are deemed eligible for weatherization services (including the prioritization of Elderly Persons, Families with Children, Persons with Disabilities, High Residential Energy Users, and High Energy Burden), they will be eligible to receive WRF.

For WRFs to be expended, an Energy Audit must be performed on the dwelling. As such, issues dealing with the safety and well-being of the auditor or general inaccessibility of areas in the dwelling (clutter) cannot be addressed with WRFs. If the dwelling cannot be made ready for weatherization, it should be deferred.

The nature of the repairs may include the following categories:

- Roof Repair/Replacement
- Wall Repair (Interior or Exterior)
- Ceiling repair
- Floor Repair
- Exterior drainage repairs (e.g. gutters)
- Plumbing repairs
- Electrical repairs
- Cleanup or remediation beyond typical scope of WAP
 - Lead Paint
 - Asbestos (Confirmed or suspected, including vermiculite), mold and/or moisture
 - Debris
 - Pests or feces removal

Any other possible issue or repair not mentioned above will require the Subrecipient to obtain permission from the Grantee (ADECA) prior to utilizing the WRF.

LIWAP and other non-DOE funds may be utilized to leverage WRF activities to bring a dwelling to weatherization readiness status.

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RESTRICTIONS

While the use of WRFs must result in a DOE-funded completion, the completion does not need to be within the same Program Year. The DOE-funded unit can be completed within a different Program Year within the same grant cycle and within a reasonable timeframe. A reasonable timeframe for the purposes of this plan is within 60 days of finishing WRF measures completed on a unit to avoid deferral. To count as a DOE completion, at least one Energy Conservation Measure (ECM) using DOE funds must be installed in the dwelling. If WRFs are used on a dwelling and the dwelling does not result in a DOE completion, the Subrecipient must reimburse ADECA the amount of WRF money spent on the dwelling with non-state, non-federal money.

WRFs will not be utilized for homes that exhibit dangerous conditions that may pose a significant threat, endangerment, or can create a significant health concern to the Subrecipient's staff, contractors, or crews.

WRF money must be tracked separately from other DOE funds.

WRFs may be used on both DOE annual-formula-funded and BIL-funded weatherization projects. While BIL will not have its own allotment of WRFs, the WRFs provided in annual-formula-funded grants may be used on dwellings that will be completed in the execution of the BIL program so long as they meet the above time frame and definition of DOE completion.

MONITORING

The WRF will be monitored through the monthly reimbursement process. Subrecipients will be required to indicate and identify the homes where WRFs was utilized on their expenditure reports.

Additionally, the WRF will be monitored during yearly remote and onsite monitoring. The Subrecipient will be responsible for producing documentation (e.g. invoices, etc.) to corroborate the expenditures for the purpose of making the dwelling weatherization ready. ADECA will collect the following information in its annual monitoring of Subrecipient:

1. Number of dwellings receiving WRFs by Subrecipient and dwelling type (site-built or manufactured)
2. Amount of WRFs spent by Subrecipient and dwelling type
3. Amount of WRFs spent per dwelling by Subrecipient
4. Nature of repairs (roof, plumbing, floors, electrical, etc.) by Subrecipient and dwelling type
5. For site-built dwellings, the year constructed
6. Other funds used to ready dwellings for weatherization, if applicable

ADECA will also ensure that each dwelling that receives WRFs results in a DOE annual-formula-funded or BIL-funded completion.

V.1.3 Definition of Children

Definition of children (below age): **18**

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.

Low-Income Members of Indian Tribes

The State of Alabama will ensure that eligible members of Indian tribes will receive benefits equivalent to the assistance provided to other low income persons within the State of Alabama. ADECA stipulates that local program operators assure weatherization activities to include low-income Native Americans.

V.2 Selection of Areas to Be Served

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Selection of Areas to be served

The Subrecipients administering the WAP at the local level have service areas. These service areas are recognized by ADECA in determining areas to be served by weatherization projects operated by either a Community Action Agency or local government entity. All of Alabama's 67 counties are served. Applicants are served based on the Priority Points received during application. Applicants with the highest points are served first. A Subrecipient may receive an application that does not rank as high on the point system as others, yet due to an unusual circumstance such as a household member's illness or storm damage, the need for weatherization services is great. In such cases, the Subrecipient may make an exception and weatherize that dwelling. Also, the Subrecipient may group dwellings having lower priority points with dwellings having higher priority points for program efficiency purposes. **Any deviation from the usual procedure requires documentation be maintained in the client file.**

In the event a Subrecipient cannot fulfill the terms of its contract, the State will use a temporary alternate Subrecipient to provide weatherization services for the area until a new Subrecipient for that area can be selected through the Request for Proposal process. This will help minimize the disruption for the service area until a new Subrecipient is in place.

The formula used to allocate funds to each county in Alabama is based on the percentage of population in poverty in each county, each county received an amount of funds based on percentage in poverty. In turn each agency is allocated funds based on which counties they serve.

The State of Alabama ensures that in selecting WAP subrecipients, preference is given to Community Action Agencies or other public or nonprofit entities that have, or are currently administering, an effective program, with program effectiveness evaluated by consideration of factors including, but not necessarily limited to, the following:

The extent to which the past or current program achieved or is achieving weatherization goals in a timely fashion;

The quality of work performed by the subrecipient and;

The number, qualifications and experience of the staff members of the subrecipient.

ADECA ensures that the funds received from the U.S. Department of Energy (DOE) for the WAP will be allocated in accordance with DOE's selection criteria for subrecipients. These funds will be allocated to areas on the basis of the relative need for a weatherization project by low-income persons. These allocations will be based entirely on the percentage of the State's population at or below poverty in each county served by the subrecipients.

Funds are allocated based on the U. S. Census Poverty Percentage Factor Data. The percentage below poverty figure for each county is applied. This ensures that funds are allocated to all areas based on relative need.

Multi-county Subrecipients will be required to adhere to each county's allocation of WAP funds by weatherizing a proportional number of units within each county of its service area in relation to its total WAP allocation.

V.3 Priorities

Priorities

In identifying and providing weatherization assistance, priority is given to elderly and disabled low-income persons, families with small children, and other high energy consuming dwelling units according to the following standard statewide prioritization procedures. These procedures are based upon a Priority Point System in which points are assigned as follows:

Priority Point System:

1. **If head of household is disabled - 10 points**
2. **If head of household is elderly (60 or over) - 10 points**
3. **Household with children under 18 years of age - 10 points**
4. **If one or more members of the household is elderly and/or disabled - 5 points**
5. **High Energy Consumers (utility bill \$200.00 or more) or LIHEAP Client- 5 points**
6. **High Energy Burden (residential energy burden exceeds median level of energy burden) - 5 points**

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Applications with the highest number of points will be weatherized first. A Subrecipient may receive an application that does not rank as high on the point system as others, yet due to an unusual circumstance such as a household member's illness or storm damage, the need for weatherization services is great. In such cases the Subrecipient may make an exception and weatherize that dwelling. The purpose of the Priority Points System is to assist Subrecipients in identifying the dwelling units most in need of weatherization assistance according to the established priorities. If an agency has 70 applications on hand from one county and only enough funding to complete 40 dwelling units, obviously some applicants will not be served with funds currently available. The Priority Points System provides for a fair and consistent means of evaluating and selecting which clients can be served and in what order.

V.4 Climatic Conditions

The climatic conditions for the major urban areas of Alabama are included in each year's State Plan. This data was obtained from the National Weather Service. The climatic variances within the state influence certain procedures utilized in the WAP.

The State of Alabama falls into two major climactic zones.

The State is divided through the middle, the northern part of the state is considered a Mixed-Humid climate while the Southern part of the state is considered a Hot-Humid Climate.

Additionally, the southern-most area of the state is also part of a Coastal Climate.

See attachment for Heating and Cooling Degree Days

V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials

Types of Work to be Performed

The State of Alabama uses the National Energy Audit Tool (NEAT) or the Mobile Home Energy Audit (MHEA). All work to be done will be consistent with a DOE-approved energy audit using materials meeting the requirements of Appendix A. Alabama will pursue receiving approval for the implementation of an Optional Priority List to be used in conjunction with Energy Audits as applicable.

Implementation of Weatherization Program Notice 22-4: Section 1

The Alabama WAP Field guides for Single Family Site Built and Mobile Homes were approved by DOE, December 2021.

Hard copies along with electronic versions are available to the Alabama WAP network. Hard copies are provided to subrecipients and electronic versions are emailed and available on the ADECA website at:

<https://adeca.alabama.gov/wp-content/uploads/AL-Field-Guide-12-6-21.pdf>

Signed receipts will be maintained to indicate receipt and agreement with standards outlined in filed guides.

Implementation of Weatherization Program Notice 22-4: Section 2

All Subrecipient agreements and vendor contracts will contain language which clearly documents the specifications for field work. ADECA will include a certification document with the Subrecipient contract to document acknowledgment and receipt of these technical requirements.

Sample Contract language may include but is not limited to:

All weatherization work performed with DOE funds by the subrecipient or any of its contractors must meet the guidelines and specifications outlined in the Standard Work Specifications (SWS) provided by the Department of Energy (DOE) and the National Renewable Energy Laboratory (NREL). The Alabama Weatherization Field Guide has been updated to include specifications and references to the Standard Work Specifications (SWS) and must be adhered to when performing weatherization work. Additional information regarding the Standard Work Specifications can be found at <https://sws.nrel.gov/>. All contracts and subcontracts entered into by the subrecipient and/or one of its contractors must include the language above.

Signed contracts will confirm receipt of and agreement to adhere to work quality expectations

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Field guide types approval dates

Single-Family: 12/6/2021
Manufactured Housing: 12/6/2021
Multi-Family:

V.5.2 Energy Audit Procedures

Audit Procedures and Dates Most Recently Approved by DOE

Audit Procedure: Single-Family Audit Name: NEAT Approval Date: 1/21/2021
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Audit Procedure: Manufactured Housing Audit Name: MHEA Approval Date: 1/21/2021

Audit Procedure: Multi-Family Audit Name: Approval Date:
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Comments

<p>Alabama received approval for the use of Weatherization Assistant v.10 on Jan 21, 2021. Currently all units will require an audit using either a National Energy Audit Tool (NEAT) or Mobile Home Energy Audit (MHEA) whichever is applicable. Alabama will pursue receiving approval for the implementation of an Optional Priority List to be used in conjunction with Energy Audits as applicable.</p> <p>Multi-Family units that are 4 units or less must use the Single Family Audit Tool (NEAT) .</p> <p>Multi Family Units greater than 4 units must use a DOE approved Multi-Family Energy Audit. The audit will be submitted to the Grantee who will submit it to DOE for review and approval before any work may be done.</p> <p>Additionally, (NEAT) can be used for individually heated and cooled units under 25 units, in addition to sending to DOE for prior approval.</p>

V.5.3 Final Inspection

<p>Final Inspections</p> <p>Subrecipients are required to conduct and approve a final inspection of each dwelling weatherized before the job can be reported to ADECA-Energy as complete. Non-compliance to this program requirement is considered a serious offense and can jeopardize a subrecipient's funding. Both the Building Weatherization Report (BWR) and the Final Inspection form must be signed and dated by the individual(s) trained and authorized to complete the inspection. The Final Inspection form also requires the signature of the Head of Household which verifies all work was performed in a satisfactory manner. The Final Inspection forms are retained in the client's folder and inspected for compliance by ADECA staff during monitoring visits. Subrecipients submit BWRs to ADECA of all homes completed the previous month for review by the program managers and/or the program supervisor to ensure program compliance.</p> <p>ADECA staff also inspects each Subrecipient's completed work during the monitoring visit on-site reviews. Weatherized homes are inspected to verify compliance with the Installation Standards. The State will monitor/inspect at least 10% of completed units and will select which jobs will be monitored at random and/or during the course of a desk review which is conducted prior to each visit.</p> <p>Implementation of Weatherization Program Notice 22-4: Section 3</p> <p>Funds are regularly available for State and Subrecipient staff to obtain Quality Control Inspector Certification through IREC accredited training centers. Subrecipients have the option of obtaining the QCI certification and performing the quality control inspection at their agencies. If Subrecipient staff is unable to obtain certification, the Subrecipient will be required to subcontract a Quality Control Inspection by a Quality Control Inspector.</p>

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- All units reported to DOE as completed will be inspected to ensure compliance with specifications outlined in the SWS.
- All quality control inspections, including final inspections and monitoring inspections, will be conducted and signed off by a certified QCI.

Due to potential lack of available agency staff, Subrecipients may use the Independent Auditor/QCI which will allow the auditor/assessor to be the same individual. Because this model does not allow for an independent review, The State will increase its monitoring efforts to include at least 10% of units completed by each subrecipient.

There are thirteen (13) Subrecipient agencies in the state of Alabama. All Subrecipient Weatherization Coordinators will have the opportunity to attend QCI training, however, due to the prerequisites for testing not all Weatherization Coordinators may be able to obtain certification. For Subrecipient agencies that do not have staff certified, each will be required to contract QCI inspections either in partnership with other community action agencies or through other certified individuals. A Memorandum of Understanding (MOU) will be entered into by Subrecipients wishing to partner with each other to perform Quality Control Inspections.

Currently seven (7) individuals hold QCI certifications in the State of Alabama, all of which currently work or contract within the WAP Network. The State is currently contracted with the Alabama Community College System to provide assistance in securing training for applicable subrecipient staff and contractors in an attempt to expand the available QCI workforce available to the WAP Network.

Subrecipients are required to ensure that each completed unit will be inspected by a certified Quality Control Inspector. As part of the State's regular monitoring, final inspection forms and processes will be reviewed to ensure the inspections are being performed correctly and in a manner that meets expectations outlined in WPN 22-4. Failure to abide by the QCI process may result in questioned/unallowable cost. Multiple instances of poor QCI inspections will result in the subrecipients being placed on a Quality Improvement Plan at minimum and may result in the loss of the Subrecipient's Weatherization Assistance Program.

Final inspection forms have been updated to include language that attests that a final inspection has been performed by a Certified Quality Control Inspector and that all work has met the requirements set forth in the Standard Work Specification.

V.6 Weatherization Analysis of Effectiveness

ADECA-Energy continuously evaluates the effectiveness of subrecipient operations. Subrecipients are selected and retained pursuant to their experience and performance with low-income persons and its capacity to perform weatherization measures. The past or current program achievement is considered. They must have the capacity to perform quality measures in a timely and effective manner.

Subrecipients must report their activities each month, information containing the number of homes completed, the number of applicants on the waiting list, number of homes in progress, expenditure reports and balances, etc. is reviewed and compiled for analysis and reporting purposes.

Files are maintained for each of the subrecipients which contain contracts and related information, along with production documentation and monitoring reports. Additionally files are maintained for each subrecipient which contains fiscal information, expenditure reports, backup documentation etc. The information maintained in these files can be used to show how each subrecipient is meeting their contractual responsibilities.

If the State identifies findings during a monitoring visit, the Subrecipient is required to successfully complete corrective actions as instructed by the State. Future monitoring visits look closely at past issues to ensure the Subrecipient has understood the corrective action and continues to perform said issues correctly.

Prior to monitoring visits, agencies will be sent a self assessment tool which inquires about fiscal status, inventories, property and equipment, internal controls, etc. These can be used by the Subrecipients to locate areas for improvement as well as a tool for monitors to review specific aspects of an agency's day to day activities. These assessments are provided to the monitor during the monitoring visit and discussed with the subrecipient during the monitoring and, if actionable, in corrective action correspondence.

Effectiveness by Subrecipient

In an attempt to quantify more information regarding each individual subrecipient's effectiveness, ADECA intends to review actual energy savings to compare Subrecipients which have similar budgets and similar unit production requirements. Actual energy savings produced between similar subrecipients can be compared so that if one agency is proving to be more effective in its weatherization as compared to another similar Subrecipient, further inquiry into why this is happening may yield opportunities for improved Training and Technical Assistance.

Another method to determine effectiveness is to track client complaints, both by nature of the actual complaint and which Subrecipient and/or contractor performed the work on that clients home. If one Subrecipient receives numerous complaints about a particular issue while a neighboring Subrecipient does not, it would stand to reason there is a teachable moment which harbors the ability to correct this recurring error. Having one agency mentor another on a particular incident has the potential to reduce the number of complaints received by the respective agency, thus making them more efficient and effective in their weatherization.

Onsite Inspections of Weatherized and In-Progress Units

The State will monitor at least 10% of completed units. In addition to completed units, monitor(s) will inspect units in progress to identify best practices and/or

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shortfalls early in the process and to allow for onsite training and technical assistance opportunities in lieu of potential disallowed costs.

Program & Fiscal Monitoring

An annual monitoring visit is conducted with each subrecipient to conduct programmatic and fiscal monitoring. These visits focus on fiscal, administrative, and programmatic compliance with all applicable federal and state WAP rules and regulations. If issues are discovered during monitoring visits they must be reconciled in the Subrecipient's response to the monitoring report and are reviewed during subsequent monitoring visit to ensure problems have been corrected.

Utility Usage Data

ADECA will strive to improve the process for collection of accurate utility usage data on homes weatherized in Alabama. Better collection and use of the data will provide greater evidence of the cost savings provided by the WAP.

V.7 Health and Safety

See Attachments for Health and Safety Plan
Total average Health and Safety Costs is currently at approximately 18%.

Subrecipients acquire additional information on the Health and Safety of prospective clients' homes by use of a Health and Safety Inspection Check List during the assessment process prior to weatherization work commencing.

In the event of an issue out of the normal scope of work found in the Health and Safety Plan, the Subrecipient should contact their assigned Program Manager, in writing, with an explanation of the unique circumstances involved in the case for discussion and approval.

V.8 Program Management

V.8.1 Overview and Organization

Organization

Administration of the WAP at the local level is performed by subrecipients – local government and community action agencies. Information concerning these agencies follows on the next page.

The administration of the WAP is performed at the state level by the Alabama Department of Economic and Community Affairs, Energy Division (ADECA-Energy).

WAP Program currently consists of the Unit Chief, Program Supervisor, and 2 Program Managers with the intention of hiring a Technical Lead. It is housed in the Energy Division of the Alabama Department of Economic and Community Affairs. The Energy Division is also home to the State Energy Program, the LIHEAP Program, and the CSBG Program.

Production information is submitted to the Program Managers for review and data collection then passed along to Program Supervisor for additional review and assessment.

Invoices are reviewed by Program Managers, spot checked by Program Supervisor and Unit Chief, and approved by Division Chief before being submitted to Financial Services for processing and payment.

V.8.2 Administrative Expenditure Limits

Administrative Expenditure Limits

Administrative funding will be no more than 15% of the program year (PY) allocation. The recipient, ADECA, can receive up to 7.5% of the total PY allocation for administrative purposes. The subrecipient must receive at least 7.5% of the PY allocation for administrative purposes.

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The budget for this PY provides approximately 3% for recipient and approximately 10% for subrecipient administrative purposes.

ADECA has determined, through historical data, that the amount budgeted for subrecipient administrative costs is sufficient for effectively implementing the administrative requirements of this grant project. ADECA will continue to review the administrative requirements for both the recipient and subrecipient to determine if additional administrative funding is required moving forward.

V.8.3 Monitoring Activities

In compliance with 10 CFR 440.12 (b) (6), the State of Alabama has established the following monitoring plan to ensure that all subrecipients adhere to contractual and Federal regulatory guidelines and instructions, have adequate programmatic and financial management control, and perform work on homes by acceptable standards.

All subrecipients will be monitored at least once each program year. Those agencies which have indicated weaknesses in any area necessary to ensure program and fiscal compliance may receive additional visits or further desktop review. A mid-year review of the subrecipient's home production will occur this program year. Unacceptable production can result in the deobligation of a subrecipient's Weatherization Funds and the reallocation of those funds to capable and productive subrecipients.

Previously, monitoring DOE units was somewhat unpredictable based on the fact that DOE and LIHEAP weatherization (LIWAP) were conducted completely separately. Generally, LIWAP production was the focus of the first half of the program year while DOE was the focus the last half; advanced scheduling was difficult due to the wait for completed units. The program now combines the DOE and LIWAP which will even out production making scheduling easier.

There are 13 subrecipients to be monitored by the recipient Program Managers/Monitors. Each Program Manager/Monitor is responsible for a series of subrecipients, called a "District". Each Program Manager/Monitor will attempt to schedule a minimum of one monitoring a quarter, more for those Program Managers/Monitors with more subrecipients, with the understanding that all subrecipients must be monitored each year. This will roughly break down as follows:

Quarter 1 - Monitoring of 1 Subrecipient

Quarter 2 - Monitoring of 5 Subrecipients

Quarter 3 - Monitoring of 3 Subrecipients

Quarter 4 - Monitoring of 4 Subrecipients

At this time, the Energy Division has 2 Program Manager/Monitors who will complete the programmatic, financial, and administrative monitoring. 40% of these their time is budgeted for T&TA through this grant. Due to turnover, the Energy Division currently has no QCI Certified individuals on staff. As a result, we have entered into a contract with Apple Energy Group to provide a team of Quality Control Inspectors to provide for the Technical requirements of Monitoring until WAP staff with the experience and training required to obtain QCI Certification have been hired. These QCI Monitors are paid 100% from T&TA for all DOE units monitored.

At least one ADECA employee will conduct a programmatic review and at least one ADECA contracted QCI will conduct a technical review of each subrecipient agency annually. During the program year, each subrecipient will be subjected to at least one (1) monitoring visit to ensure the provision of quality services. Programmatic and technical reviews may take place concurrently or independently. Alabama is using the independent Auditor/QCI option where applicable, however due to the significant shortage of QCI in the state (Alabama ranks 48 out of 50 states for number of QCI as of 2023) many subrecipients are forced to use the same individual for both Auditor and QCI. For the sake of consistency and to avoid confusion, Alabama has defaulted to Monitoring at least 10 % of all completed homes, even those capable of Independent Audit/QCI. A minimum of 10% of the house allocation per subrecipient will be visited by the monitor(s). ADECA will increase both the frequency and percentage of units monitored of Subrecipients with significant or repeated deficiencies. Monitoring includes approximately 10 Client File reviews (if that many are available) these reviews look at the application, required eligibility documentation, Priority Point calculations, Identification, signatures, and forms. Contractor files are reviewed to ensure they possess all required documentation such as business licenses, training certification, insurances, and contracts between the subrecipient and the contractor. Bid documentation is reviewed to ensure that the bidding was done according to any laws and policies and that the lowest responsible bidder is awarded the work and if they were not a clear and justifiable reason is provided as to why. We also review subrecipient agency documentation including insurance, mileage logs, time sheets, invoices, and payments to contractors.

After a monitoring visit has taken place a monitoring report is generated and sent to the subrecipient within 30 days. This report contains an overview of the monitoring and any findings along with corrective actions, if applicable. The subrecipient then has 30 days to respond to the recipient monitoring report with a corrective action plan, if applicable, that demonstrates the process and procedures that the subrecipient will implement, including timelines, to address the deficiency observed by the recipient during the monitoring visit. The recipient will review the corrective action plan to determine if all corrective actions have been adequately addressed, if corrective actions have not been adequately addressed to the satisfaction of the grantee the subrecipient is issued an additional letter explaining what needs to be done further. The subrecipient then has 15 days to respond. If the subrecipient does not complete the required corrective actions to the satisfaction of the recipient, funding may be withheld until all corrective actions have been satisfactorily completed.

The Independent Auditors and State Examiners review subrecipient program operations on an annual basis. These internal audits will be conducted in accordance with the General Accounting Office's "Standards for Audits of Governmental Organizations, Programs, Activities, and Function" and generally accepted auditing standards established by the American Institute of Certified Public Accountants.

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Monitoring findings by the Energy Division and the reviews by Independent Auditors and/or State Examiners will be reported to the subrecipients in writing in a timely manner. Any deficiencies in program operations which are not corrected in accordance with the instructions may result in funds being withheld from the subrecipients or in termination of that agency's program.

Each subrecipient is required to submit monthly Production Progress Reports to ADECA-Energy within fifteen (15) calendar days of the first of each month if the agency has a Weatherization Contract. This report compiles data such as the demographics of the homes weatherized for the previous month. The report also tracks the subrecipients' homes in-progress. The reports are reviewed and recorded to ensure that plan versus performance goals are being met. Attached to these reports are the Building Weatherization Reports for each unit reported completed on the Production Progress Report, including their QCI signed Final Inspection checklist to certify units are receiving QCI final inspection prior to being considered 'completed'. Failure to submit the report within the allotted time frame could delay the subrecipient's funding.

To ensure monitoring is conducted impartially and completely, both Technical and Programmatic Monitorings make every effort to randomize the units selected and periods of time within the grant cycle reviewed.

In addition to these monitoring efforts, each subrecipient is required to receive a Single Audit Report of Federal funds in compliance with 2 CFR 200 Subpart F if applicable. Audits are reviewed by recipient staff as part the risk assessment each year.

ADECA will ensure the monitoring process is performed in an impartial and complete manner, including the review of energy modeling inputs and outputs. ADECA will review the success of the monitoring policies and resolve any issues that affect the quality and impartiality of the inspection process.

Monitoring Costs are allocated to T&TA funding. \$250,000.00 has been budgeted for current and backlogged Technical Monitoring. This is approximately 50% of the T&TA funding budgeted for this program year.

V.8.4 Training and Technical Assistance Approach and Activities

Alabama Weatherization Assistance Program T&TA Plan

ADECA has partnered with the Alabama Community College System to identify the training needs of the WAP network, develop a comprehensive training plan, and coordinate the implementation of the plan with the use of **Bipartisan Infrastructure Law (BIL) funding**. The plan has developed into the provision of Weatherization Curriculum that will be offered at the state's developing Energy Infrastructure Training Center. Due to T&TA funds from BIL supporting a training program that will benefit the entire Weatherization Network, including workers completing Annual Weatherization Assistance Program units, additional funding will not be allocated for training on this grant beyond the provision of a total of \$48,000.00 for the attendance of local, internal training opportunities within the Community Action Association.

2 staff per agency x 12 agencies x 2 training conferences annually x \$1,000.00 per training conference = **\$48,000.00**

(NOTE: Alabama has 13 sub-awards, but only 12 agencies. Two sub-awards are administered by the same agency.)

All other T&TA will be provided by the BIL funded State T&TA Coordinator through the Weatherization Curriculum provided by the state's developing Energy Infrastructure Training Center and numbers of courses and clients will be reported on the BIL T&TA Report. A copy of the curriculum and plan will be attached to this application.

The T&TA Plan has been created with feedback from DOE monitoring visits, internal state audits, monitoring of the subrecipients, IG reports, analysis of effectiveness, and SWS updates taken into consideration. As further assessments of effectiveness are made, the number or breadth of services provided may be expanded to account for the assessed needs of the network.

Currently certifications and licenses are maintained at the subrecipient level for contractors used by the subrecipient to perform weatherization work on homes. In that same way the State will begin to maintain copies of certifications and a database of certified individuals in the weatherization network with a current emphasis on Quality Control Inspector certifications.

There are seven individuals in the state who have QCI certification in the WAP network. While not all subrecipient staff will be able to sit for the test, the QCI training will be available for subrecipient weatherization staff.

Subrecipients may direct contractors to the State T&TA Coordinator to receive weatherization training to remain up to date on current methods, rules and regulations. T&TA funds will be made available for contractors who currently work in the Alabama WAP network with the stipulation that they will have to cover their costs initially but can then be reimbursed once the training is completed. Reimbursement will be limited to registration fees and lodging based on the

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location of the conference; if extensive travel is required travel costs may also be reimbursed. Contractors will also be required to sign a retention agreement stating they will continue to provide weatherization services to the Alabama WAP network for a minimum of six months.

Workforce Development

In addition to the Alabama Community College System executing a Training Needs Assessment and coordinating the course load for the new training center, they are also responsible for advertising the offerings of the Training Center for the WAP Network. ACCS is continuing to develop execute their plan for marketing/advertising the offerings of the Training Center over the next 4 years through social media, electronic and print flyers, and utilization of software systems to target specific geographic areas/occupations that may be interested in the services. Additionally, the trainings will be promoted internally throughout the Community College System to students.

Client Education

During assessment of a home, the assessor reviews the specific measures to be performed on the home and answers any questions the client may have. Both the Recipient and the Subrecipient are available to answer questions if an issue arises. Clients are also provided with booklets and pamphlets to aid in their understanding of energy saving and potential dangers. The following client education materials are provided to each client:

Energy Savers Tips on Saving Energy and Money

Carbon Monoxide – The “Invisible” KILLER

The Lead-Safe Certified Guide to Renovate Right

A Brief Guide to Mold, Moisture, and Your Home

A Citizen’s Guide to Radon – The Guide To Protecting Yourself And Your Family From Radon

Percent of overall trainings

Comprehensive Trainings:	50.0
Specific Trainings:	50.0

Breakdown of T&TA training budget

Percent of budget allocated to Auditor/QCI trainings:	25.0
Percent of budget allocated to Crew/Installer trainings:	25.0
Percent of budget allocated to Management/Financial trainings:	50.0

V.9 Energy Crisis and Disaster Plan

The State will not be implementing an Energy Crisis Plan.

Alabama Weatherization Health and Safety Plan

2024 Program Year

POLICY SUBMITTED WITH PLAN

1.0 – GENERAL INFORMATION

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

This Health and Safety Policy is part of the 2024 Alabama Weatherization Assistance Program.
Effective April 1, 2024 through March 31, 2025

2.0 – BUDGETING

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

Select which option is used below.

Separate Health and Safety Budget

Contained in Program Operations

3.0 – HEALTH AND SAFETY EXPENDITURE LIMITS

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

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

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

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

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

Enter Measure ↓	Enter Cost ↓	Enter Frequency % ↓	Auto Calculates
CO Alarm	\$73.00	99.0%	\$72.27
Smoke Alarm	\$75.00	95.0%	\$71.25
ASHRAE 62.2-2016	\$640.00	65.0%	\$416.00
Install Direct-Vent Space Heater	\$3,326.00	6.0%	\$199.56
Repair Roof Leak	\$300.00	5.0%	\$15.00
Clean Gas Stove	\$50.00	1.0%	\$0.50
DWH Drip Line	\$48.00	17.0%	\$8.16
Remove UVSH	\$61.00	11.0%	\$6.71
Replace Dryer vent	\$106.00	35.0%	\$37.10
Correct Electrical Issue	\$300.00	5.0%	\$15.00
LSW	\$350.00	5.0%	\$17.50
Repair/Upgrade Venting	\$257.00	18.0%	\$46.26
Hazardous Material Disposal	\$300.00	1.0%	\$3.00
Furnace Replacment	\$6,336.00	7.0%	\$443.52
Furnace Repair/Tune	\$392.00	6.0%	\$23.52
Mold/Moisture	\$300.00	9.0%	\$27.00
Repair Gas Leak	\$70.00	1.0%	\$0.70
Fire Extenguisher	\$50.00	10.0%	\$5.00
Pest Removal	\$300.00	1.0%	\$3.00
Drainage Issues	\$150.00	1.0%	\$1.50
Total Average H&S Cost Per Unit			\$1,412.55
Enter Estimated Production (Annual File: IV.2 WAP Production Schedule) →			300
Enter Estimated Program Operations Budget →			2326972
H&S Budget (Total Average H&S Cost Per Unit * Estimated Production)			\$423,765.00
Requested H&S Percentage Per Unit (H&S Budget/Program Operations)			18.2%

4.0 – INCIDENTAL REPAIR MEASURES

If Recipients choose to identify any H&S measures as incidental repair measures (IRMs), they must be implemented as such under the Recipient's weatherization program in all cases – meaning, they can never be applied to the H&S budget category. In order to be considered IRMs, the measure must fit the following definition and be cost justified along with the associated efficiency measure;

Incidental Repairs means those repairs necessary for the effective performance or preservation of weatherization materials. Such repairs include, but are not limited to, framing or repairing windows and doors which could not otherwise be caulked or weather-stripped and providing protective materials, such as paint, used to seal materials installed under this program. ([10 CFR 440 "Definitions"](#))

Alabama does not choose to identify any H&S measures as incidental repair measures (IRMs).

5.0 – DEFERRAL/REFERRAL POLICY

Deferral of services may be necessary if H&S issues cannot be adequately addressed according to WPN 17-06 guidance. The decision to defer work in a dwelling is difficult but necessary in some cases. This does not mean that assistance will never be available, but that work must be postponed until the problems can be resolved and/or alternative sources of help are found. If, in the judgment of the auditor, any conditions exist which may endanger the health and/or safety of the workers or occupants, the unit should be deferred until the conditions

are corrected. Deferral may also be necessary where occupants are uncooperative, abusive, or threatening. Recipients must be specific in their approach and provide the process for clients to be notified in writing of the deferral and what conditions must be met for weatherization to continue. Recipients must also provide a process for the client to appeal the deferral decision to a higher level in the organization.

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

Yes No

Weatherization Deferral Policy

Deferral may be necessary if issues cannot be adequately addressed. The decision to defer work on a dwelling is difficult but necessary in some cases. This does not necessarily mean that assistance will never be provided, but that weatherization work must be postponed until the problematic conditions causing deferral can be resolved with alternative sources of help and/or funding. In the judgment of the assessor, any conditions that exist which may endanger the health and/or safety of the occupants or workers should necessitate that weatherization be deferred until the conditions are corrected. Deferral may also be necessary where occupants are uncooperative, abusive, or threatening. Such insolent behavior on the part of the occupants will not be tolerated and may consequently result in weatherization assistance never being provided.

A dwelling unit should not be weatherized where there is a major code violation (code violations that cannot be remedied within the scope of a subrecipient's Health and Safety Cost Deferral Policy or Weatherization Readiness Fund Policy) or where there is a potentially harmful situation that may adversely affect the occupants, subrecipient staff, or weatherization contract workers. Only after the unit owner corrects the problems shall weatherization work begin. It is not necessarily the responsibility of the Subrecipient to correct such problems. The Subrecipient's Weatherization Coordinator, assessor, or contract assessor must declare his/her intent to defer weatherization on an eligible unit on the *Home Energy Assessment Checklist* and/or the *Health and Safety Inspection Checklist*. Either checklist should include the client's name and address, dates of the audit/assessment and when the client was informed in writing, and a clear description of the problematic condition(s).

The United States Department of Energy (USDOE), however, requires that additional documentation be maintained in the client file whenever deferral is deemed necessary. The *Weatherization Deferral Form* serves to clearly inform the client of the reason(s) to defer weatherization assistance on his/her home and what actions the client or his/her landlord must undertake to rescind the deferral to permit weatherization assistance to ensue. It is expected in nearly all cases of deferral that the client signs the *Weatherization Deferral Form* to acknowledge that he/she understands the reasoning for the deferral and what actions must be undertaken to rescind the deferral.

Few circumstances may arise where deferral is a result of insolent behavior or illegal activity. Requiring a client to acknowledge such conditions or activity exist in his/her home by signing the *Weatherization Deferral Form* may very likely place the party initiating the deferral in a precarious situation. Under absolutely no circumstances does the State of Alabama expect weatherization personnel to place themselves in such risky situations. In cases where weatherization personnel's safety is compromised, completing the *Weatherization Deferral Form* should be postponed until the weatherization assessor has time to discuss the case with the weatherization coordinator away from the potentially dangerous environment of the client's home. In accordance with USDOE's expectations, though, the client must still be notified for the reason(s) for the deferral. Therefore, the weatherization Subrecipient, in these rare but dangerous circumstances, must mail the *Weatherization Deferral Form* to the client certified mail with return receipt via the United State Postal Service. A copy of the *Weatherization Deferral Form* and the return receipt must be maintained in the client

file to verify due diligence on the part of the weatherization Subrecipient was taken to notify the client of the reason(s) for deferral.

Should a client request a second opinion on a deferral, the Subrecipient is encouraged to contact its local county health, building, electrical, or other county inspector to request an inspection of the site. Should the client refuse to have a county inspector inspect the dwelling, the weatherization coordinator will note the refusal in the client file, and no weatherization work shall be performed on the dwelling. If the inspector deems that work pending deferral can or should be performed, the weatherization coordinator, assessor, and weatherization contractor are encouraged to work with the inspector's suggestions to make the improvements. However, the inspector does not make the final determination on the amount, cost of work, or measures applied to the unit. Consequently, the weatherization coordinator may deem the suggested measures to be financially or programmatically out of the scope of Weatherization Assistance Program and may still defer the weatherization work.

A weatherization contractor, too, may encounter a unit to be unfit for weatherization by the time of his/her arrival to perform weatherization work. If this so happens to be the case, the weatherization contractor should not begin work, but instead contact the weatherization coordinator to explain the problematic condition(s). The weatherization coordinator should then follow the same procedures in documenting the deferral as required when a problematic condition necessitating a deferral is discovered during the assessment. The State of Alabama does not require, expect, or encourage weatherization contractors to work in unsafe or unhealthy conditions.

Deferral conditions may include, but are not limited to:

1. The cost of health and safety measures on a unit would exceed those established by the Subrecipient's Health and Safety Cost Deferral policy.
2. The client, or other household member, has known health conditions that prohibit the installation of insulation materials or other weatherization materials.
3. The building structure or its mechanical systems, including electrical and plumbing, are in such a state of disrepair that failure is imminent and the conditions cannot be resolved cost effectively or within the scope of the Weatherization Assistance Program guidance.
4. The house has raw sewage, excessive animal feces, or other sanitation problems that would further endanger the client and weatherization contractors if the weatherization work were performed.
5. The house has been condemned or electrical, heating, plumbing, or other equipment has been "red tagged" by local, county, or state building officials or utilities due to safety or code issues.
6. Moisture problems that are so severe they cannot be resolved under existing health and safety measures.
7. Dangerous conditions exist due to high carbon monoxide levels associated with combustion appliances which cannot be resolved under existing health and safety measures and guidance.
8. The client is uncooperative, abusive, hostile, or threatening to the assessors, weatherization contractors, inspectors, or others who must work on or visit the home.
9. The extent and condition of lead-based paint in the house would potentially create increased health and safety hazards for both the occupants and crew members.
10. In the judgment of the assessor, if any condition exists which may endanger the health and/or safety of the work crew or subcontractor, then the work should not proceed until the identified condition(s) is satisfactorily corrected.
11. If a mold condition is discovered during the assessment of the home by an assessor and cannot be adequately addressed by the weatherization contractor, the unit will be referred to the appropriate public or non-profit agency for remedial action. Alabama weatherization Subrecipients shall defer work on the home until the owner completes mold remediation or another funding source funds and completes the

mold remediation. Alabama weatherization Subrecipients shall distribute the pamphlet from the U.S. Environmental Protection Agency (EPA), Indoor Environment Division, (IED): "A Brief guide to Mold, Moisture, and Your Home" to all clients whether or not mold is found. The pamphlet can be found at <http://www.epa.gov/mold/pdfs/moldguide.pdf>

12. Client cannot be reached at telephone number on file due to the service being disconnected or due to client unavailability.
13. Client refuses to allow assessors access to all areas of the home necessary to conduct the comprehensive weatherization assessment.
14. Presence of animals which pose a risk to assessors, weatherization contractors, and/or inspectors. The work may be deferred until such animal threats have been secured adequately so that they no longer pose a threat.
15. Unable to gain access to the area to perform work. The work may be deferred until the blocked access is cleared to allow the necessary access to perform the work.
16. The unit is of such filth and squalor or where the presence of excessive hoarding hampers the ability of the assessor or contractor to carry out their weatherization duties.
17. The presence of illicit activity on the premises including but not limited to: illegal drug use; distribution, possession, and/or sale of illegal drugs; prostitution; domestic violence; child abuse; and cruelty to animals. In cases where unlawful activity is witnessed, local authorities are to be notified promptly by the weatherization coordinator. Written documentation explaining the unlawful activity should be maintained in the client file and if possible, without jeopardizing one's safety, the weatherization personnel may try to obtain photographic documentation of the illicit activity to provide to authorities.

6.0 – HAZARD IDENTIFICATION AND NOTIFICATION FORM(S)

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

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

Yes

No

7.0 – HEALTH AND SAFETY CATEGORIES

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

- *Explain whether you concur with existing guidance from WPN 17-06 and how that guidance will be implemented in your Program, if you are proposing an alternative action/allowability, or if the identified category will not be addressed and will always result in deferral. Alternatives must be comprehensively explained and meet the intent of DOE guidance.*
- *Where an Action/Allowability or Testing is “required” or “not allowed” through WPN 17-06, Recipients must concur, or choose to defer all units where the specific category is encountered.*
- *“Allowable” items under WPN 17-06 leave room for Recipients to determine if the category, or testing, will be addressed and in what circumstances.*
- *Declare whether DOE funds or alternate funding source(s) will be used to address the particular category.*
- *Describe the explicit methods to remedy the specific category.*
- *Describe what testing protocols (if any) will be used.*
- *Define minimum thresholds that determine minor and major repairs*
- *Identify minimum documentation requirements for at-risk occupants*
- *Discuss what explicit steps will be taken to educate the client, if any, on the specific category if this is not explained elsewhere in the Plan. Some categories, like mold and moisture, require client education.*
- *Discuss how training and certification requirements will be provided for the specific category. Some categories, like Lead Based Paint, require training.*
- *Describe how occupant health and safety concerns and conditions will be solicited and documented*

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

7.1 – Air Conditioning and Heating Systems

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral
 Air Conditioning Unallowable Measure Heating Unallowable Measure

The replacement of Air Conditioning and/or Heating Systems must always be evaluated as an Energy Conservation Measure (ECM) first. If evaluation indicates the measure to have Savings to Investment Ratio (SIR) ≥ 1.0 it must be completed as an ECM and charged to Program Operations.

When a space conditioning system does not qualify as an ECM, the following conditions must be met before the unit can be replaced or repaired with Health and Safety funds:

- Alabama does permit the installation and repair of heating systems and cooling systems (if “at-risk”) as a health and safety measure if it is not cost-prohibitive. Weatherization Subrecipients are afforded the discretion to determine whether the measure is cost-prohibitive based on the health and safety funds available in their budgets. When the measure is cost-prohibitive, the weatherization work should be deferred until alternative resources can be obtained to correct the heating and/or cooling system. The client should always be made aware of any dangers caused by the heating system.
- “Red tagged,” inoperable, or nonexistent primary heating system may be replaced, repaired, or installed where climate conditions warrant, consistent with this guidance.
- Primary air conditioning system replacement, repair, or installation is allowed only in homes where current occupants are considered “at-risk” AND climate conditions warrant. “System” can mean a central unit or several individually operating units; however, when a central unit is in place, it shall be considered the primary unit, and all other units are to be considered secondary.
- Use proper sizing protocols (Manual J, State Approved sizing protocols, NEAT/MHEA outputs, etc.) based on post-weatherization housing characteristics, including installed mechanical ventilation, when installing or replacing a heating or cooling appliance.
- Alabama requires all HVAC system installation to follow local and state code and it must be performed by a licensed HVAC professional. Weatherization Subrecipients must require weatherization contractors who are not licensed HVAC companies/individuals subcontract licensed HVAC companies/individuals to perform heating system installations and repairs.

Heating Degree Days (HDD) range from 3,044 HDD in North Alabama to 2,029 HDD in South Alabama Cooling Degree Days (CDD) range from 2,181 CDD in North Alabama to 2,962 CDD in South Alabama.

Funding

DOE LIHEAP State Utility Other

DOE funds may be used to address this category

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

Unsafe or non-functioning primary heating units must be repaired, replaced and removed, or rendered inoperable, or deferral is required.

Non-functioning cooling units may be repaired, or replaced in homes with “at-risk” occupants.

How do you address unsafe or non-functioning secondary heating systems, including unvented secondary space heaters?

Replacement or installation of secondary units is not allowed.

Unsafe secondary units, including space heaters, must be repaired, removed, or rendered inoperable, or deferral is required.

Any heating and cooling systems removed in the course of weatherization work shall be disposed of according to all local laws, regulations and/or Federal guidelines, as applicable.

See Hazardous Materials Disposal section for more information

Indicate Documentation Required for At-Risk Occupants

An individual who is “At-Risk” as it pertains to this category is any member of the household whose health or well-being would likely be endangered as a result of extreme temperatures.

To document an individual’s status as “At-Risk” and therefore eligible to receive this service he/she must supply the Agency with an *At-Risk Physician/Nurse Medical Statement*.

The *At-Risk Physician/Nurse Medical Statement* is a form completed by the client’s Physician/Nurse verifying that this individual does have a medical condition which can be affected as a result of extreme temperatures.

Testing Protocols

Make sure primary systems are present, operable, and performing correctly.

When replacing a system an audit must be used to determine if the system can be installed as an energy conservation measure (ECM) prior to replacement as an H&S measure.

If the measure is cost effective by returning an SIR of 1 or greater then it must be replaced and billed as an ECM, if it is not cost effective it should be replaced and billed as a Health and Safety Measure.

Determine and document presence of "at-risk" current occupants when installing air-conditioning as a Health and Safety (H&S) measure.

On combustion equipment, inspect chimney and flue and test for Combustion Appliance Zone (CAZ) depressurization.

For solid fuel appliances look for visual evidence of soot on the walls, mantel or ceiling or creosote staining near the flue pipe

Minimal standards for remedy include, but are not limited to the following:

Ducts:

Ducts testing <1pascal (pa) are considered to be in good condition or within the pressure boundary. Visual inspection of the ducts in site-built houses is required because supplies within the pressure boundary may be leaking into undesirable locations. Return systems should always be sealed as well as possible. Supply leaks nearest the air handler should be addressed in preference to more distant equivalent leaks.

Clean ducts prior to sealing to ensure that sealing materials adhere and remain effective.

When sealing ducts with mastic, use fiberglass wrap for the first 3 feet next to the plenum to reinforce the mastic seal.

Replace crushed registers.

The return ducts must always be sealed. Return ducts should never be open to a combustion zone. (A worst-case depressurization test should be performed.)

When working on manufactured mobile homes, ensure that ducts are attached and sealed properly to ensure heat is going into the home and not onto the ground beneath the home.

Controls:

Check anticipator settings on gas furnace thermostats and adjust to actual amperage draw.

Replace thermostats that do not have an anticipator. This does not apply to millivolt systems.

Install a setback thermostat whenever the client is capable of understanding the technology and is willing to learn how to use it correctly. Install the setback thermostat early in the weatherization process and review its use with the client. Consider making a specific appointment to install the thermostat and instruct the client on its proper use. Follow local and state codes and regulations when installing thermostats.

Share, with the client, evaluation data that shows the savings potential of using setback behavior even if client does not choose to have a setback thermostat installed.

Furnaces (heating systems):

Check for Gas Leaks
Check the heat exchange for cracks. This should be part of the energy audit process.
Draft Testing, Pre and Post Weatherization
Check Ambient and System CO
Verify combustion air source
Check venting system to insure it is functioning properly
Clean the fan, motor, and exterior of the furnace. Oil the motor.
Clean or replace filters. Talk with the client about continuing and ongoing maintenance, taking into account the client's understanding, willingness, and convenience.
High flow filters are recommended when replacing filters.
The supply temperature and heat rise should not exceed the appliance rating.
Limit switches must work properly.
The goal of all testing shall be to make sure heating systems are present, operable, and performing safely. Additionally, we want to determine the presence of occupants who may have been exposed to a hazard or danger relating to the system.

Air Conditioners (cooling systems):

Check wiring for burned or frayed wires at unit and disconnect.
Ensure unit has independent outdoor disconnect within sight or 12ft of unit
Check that filter is present and clean.
Ensure safety switches on heat pump wired properly and in working order.

Client Education

When deferral is necessary, provide information to the client, in writing, describing conditions that must be met in order for weatherization to commence. A copy of this notification must also be placed in the client file.

Discuss appropriate use and maintenance of units.

Provide all paperwork and manuals for any installed equipment.

Discuss and provide information on proper disposal of bulk fuel tanks when not removed as part of the weatherization work.

Where combustion equipment is present, provide safety information including how to recognize depressurization.

Training

WAP H&S policy training on allowable activities.

Licensing and/or certification for HVAC installers as required by authority having jurisdiction (AHJ).

CAZ depressurization test and inspection training.

7.2 - Asbestos - All

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

Blower Door Testing when possible Asbestos Containing Materials (ACM) is a major concern which can affect the Health and Safety of the workers and clients. To reduce the likelihood of exposure the general guidelines listed below must be followed.

Pressurized Blower Door testing will be conducted when solid ACM are present in the attic, walls, or on duct work.

If suspected ACM's are air born no blower door testing will be conducted.

If Suspected ACM's are in siding on the outside of the home depressurized blower door testing may be conducted as usual.

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

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

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

Funding

DOE LIHEAP State Utility Other

DOE funds may be used to address this category

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

General asbestos removal is not approved as a health and safety weatherization cost.

The existence of asbestos siding that is in good condition does not prevent installing dense-pack insulation from the exterior.

Siding may be removed and reinstalled in order to perform the ECM, and the associated costs may be charged as part of the ECM.

All precautions must be taken not to damage the siding. Asbestos siding should never be cut or drilled.

Recommended, where possible, to insulate through home interior walls.

General abatement of asbestos siding or replacement with new siding is not an allowable H&S cost. Asbestos problems should be referred to the appropriate state agency and/or EPA.

Testing Protocols

Visually inspect exterior wall surface and subsurface, floors, walls, and ceilings for suspected ACM prior to drilling or cutting.

Asbestos Hazard Emergency Response Act of 1986 (AHERA) sample collection and testing must be conducted by a certified tester.

It is difficult to tell whether a material contains asbestos simply by looking at it, unless it is labeled. If in

doubt, treat the material as if it contains asbestos.

Inspect exterior wall surfaces and sub-surfaces for asbestos siding prior to drilling or cutting. Typically, asbestos appears as a whitish, fibrous material which may release fibers that range in texture from coarse to silky.

Do not permanently or temporarily replace or remove asbestos siding.

Keep activities to a minimum in any areas having damaged material that may contain asbestos. Document and inform the client regarding the damaged material and suspected asbestos. Do not further disturb the material. If necessary, weatherization work to that area may have to be deferred.

Do not dust, sweep, or vacuum debris that may contain asbestos.

Never saw, sand, scrape, or drill holes in asbestos materials. Asbestos siding should never be cut or drilled.

Do not track material that could contain asbestos through the house.

Follow EPA and OSHA regulations regarding the safe handling of asbestos to ensure worker and client safety.

Client Education

Inform the client in writing that suspected ACMs are present and what precautions will be taken to ensure the occupants' and workers' safety during weatherization.

Formally notify client in writing of results if testing was performed.

Training and Certification Requirements

Safe practices for siding removal and replacement.

How to identify suspected ACM.

Licensing/certification for removal and reinstallation of asbestos siding if required by AHJ.

7.2b – Asbestos - in vermiculite

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

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

Funding

DOE LIHEAP State Utility Other

DOE funds may be used to address this category

How do you address suspected ACM's in vermiculite that will be disturbed through the course of weatherization work?

When vermiculite is present, assume it contains asbestos unless testing determines otherwise.

Do not perform a blower door test if it will disturb the vermiculite.

If testing determines asbestos is not present blower door testing may be conducted as usual.

Use proper respiratory protection while in areas containing vermiculite.

Encapsulation by an appropriately trained asbestos control professional is allowed. Removal is not allowed.

When deferral is necessary due to asbestos, occupant must provide documentation that a certified professional performed the remediation before work continues.

Testing Protocols

AHERA sample collection and testing must be conducted by a certified tester.

Baseline environmental asbestos sampling is an allowable cost.

Do not open any walls to check for vermiculite. Only check for vermiculite in the attic, and if found, leave it undisturbed, when possible.

If it is necessary to go into the attic containing vermiculite insulation, limit the number of trips and the shorten the length of those trips in order to limit any potential exposure and to avoid disturbing the product as any disturbance could potentially release asbestos fibers into the air.

Wear protective equipment when entering an attic area that may contain vermiculite insulation.

Do not track vermiculite insulation or associated dust into the living spaces of the home.

Follow EPA and OSHA regulations regarding the safe handling of asbestos to ensure worker and client safety.

Client Education

Instruct clients in writing not to disturb suspected ACM.

Provide asbestos safety information to the client.

Formally notify client in writing of results if testing was performed.

When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

Training and Certification Requirements
Assessors should be able to recognize vermiculite.
AHERA or state certification to conduct testing.
AHERA or other appropriate asbestos control professional certification/training for encapsulation.

7.2c – Asbestos - on pipes, furnaces, other small covered surfaces

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

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

Funding

DOE LIHEAP State Utility Other

DOE funds may be used to address this category

How do you address suspected ACM's (e.g., pipes, furnaces, other small surfaces) that will be disturbed through the course of weatherization work?

Assume asbestos is present in suspect covering materials.

When suspected friable ACM is present, take precautionary measures as if it is asbestos unless testing determines otherwise.

Encapsulation by an appropriately trained asbestos control professional is allowed and should be conducted prior to blower door testing if the materials are friable.

Recipient may allow removal by an appropriately trained professional on a case-by-case basis. To request case-by-case approval, the subrecipient should submit an explanation of the situation to the State, including proposed cost of correction, what trained professionals will be used for the work, and any other factors of note.

The Recipient will make a determination based on the cost associated with removal, if the cost is deemed unreasonable the home may have to be deferred until the issue can be addressed.

Charge only those costs directly associated with the testing, encapsulation, or removal to the H&S budget category.

When deferral is necessary due to asbestos, occupant must provide documentation that a certified professional performed the remediation before work continues.

Testing Protocols

Assess whether suspected ACMs are present.

AHERA sample collection and testing is allowed and must be conducted by a certified tester.

Client Education

Instruct clients in writing not to disturb suspected ACM.

Provide asbestos safety information to the client.

Formally notify client in writing of results if testing was performed.

When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

Training and Certification Requirements

Auditors should be able to recognize suspected ACM.

AHERA or other appropriate asbestos control professional certification/training is required to abate the ACM.

7.5 – Biologicals and Unsanitary Conditions
(odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.)

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral
Unallowable Measure

Funding

DOE LIHEAP State Utility Other

DOE funds may be used to address this category

What guidance do you provide Subrecipients for dealing with biological and/or unsanitary conditions in homes slated for weatherization?

Remediation of conditions that may lead to or promote biological concerns and unsanitary conditions is allowed.

Addressing bacteria and viruses is not an allowable cost.

Deferral may be necessary in cases where conditions in the home pose a health risk to occupants and/or weatherization workers.

See Mold and Moisture section for more information.

Testing Protocols

Sensory inspection

Client Education

Inform client in writing of observed conditions.

Provide information on how to maintain a sanitary home.

When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

Training
How to recognize unsafe conditions and when to defer.
Safe work practices when encountering such conditions.

7.6 – Building Structure and Roofing
Concurrence, Alternative, or Deferral
Concurrence with Guidance <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/> Results in Deferral <input type="checkbox"/>
Weatherization is not a Rehabilitation Program, if the unit to be weatherized has structural issues beyond the scope of weatherization it must be deferred until the issue is addressed by either other funding or the homeowner.
Funding
DOE <input checked="" type="checkbox"/> LIHEAP <input type="checkbox"/> State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input type="checkbox"/>
DOE funds may be used to address this category
What guidance do you provide Subrecipients for dealing with structural issues (e.g., roofing, wall, foundation) in homes slated for weatherization?
Site conditions that poses a safety hazard to agency staff or subcontractors which cannot be corrected within the scope of the program may result in a deferral.
Building structure & roofing should be evaluated visually so that no existing conditions are disturbed. Structural problems with dwellings often lead to deferral because the scope is beyond the means of the program to treat.
Roof repairs are allowable as a H&S measure if: <ul style="list-style-type: none"> - It resolves and bulk water intrusion issue that is the cause of visible biological growth - The H&S r of repair is well documented with written explanation and photos of the biological growth in the client file.
How do you define “minor” or allowable structure and roofing repairs, and at what point are repairs considered beyond the scope of weatherization?
The incidental repair cost is attributed to the cost of the measure and becomes part of the SIR. If the cost of the repair causes the measures SIR to drop below 1.0 then the measure cannot be completed and the unit may need to be deferred.
If priority lists are used, and these repairs are designated as Incidental Repairs, at what point is a site-specific audit required?
No priority lists are in use.
Client Education
Notify client in writing of structurally compromised areas.
When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.
Training
Assessors are able to identify structural and roofing issues.

7.7 – Code Compliance		
Concurrence, Alternative, or Deferral		
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>
Funding		
DOE <input checked="" type="checkbox"/>	LIHEAP <input type="checkbox"/>	State <input type="checkbox"/>
	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
DOE funds may be used to address this category		
What guidance do you provide Subrecipients for dealing with code compliance issues in homes receiving weatherization measures?		
<p>Correction of preexisting code compliance issues is not an allowable cost unless triggered by weatherization measures being installed in a specific room or area of the home.</p> <p>When correction of preexisting code compliance issues is triggered and paid for with WAP funds, cite specific code requirements with reference to the weatherization measure(s) that triggered the code compliance issue in the client file.</p> <p>Follow State and local or AHJ codes while installing weatherization measures, including H&S measures. Condemned properties and properties where “red tagged” H&S conditions exist that cannot be corrected under this guidance must be deferred.</p>		
What specific situations commonly trigger code compliance work requirements for your network? How are they addressed?		
<p>Some AHJ require all code issues be addressed regardless of whether or not the issue is related to weatherization; for example, one AHJ requires all smoke detectors be hard wired, and while we have a variance which does not require that for our program this AHJ still requires this be done. Also, when repairing combustion appliance venting this AHJ requires that the entire vent be replaced not just one section or area repaired. While sometimes there are additional funds that can address these issues that is not always the case. When additional funds are not available homes may be deferred until other funds are available.</p>		
Client Education		
<p>Inform client in writing of observed code compliance issues when it results in a deferral.</p> <p>When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.</p>		
Training		
<p>Assessors should determine what code compliance may be required.</p> <p>Sub-Recipients must be aware of code compliance.</p> <p>Sub-Recipients must ensure that weatherization-related work complies with all applicable codes.</p>		

7.8 – Combustion Gases

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Proper venting to the outside for combustion appliances, including gas dryers and refrigerators, furnaces, vented space heaters and water heaters is required.

Correct venting when testing indicates a problem.

If unsafe conditions whose remediation is necessary to perform weatherization cannot be remedied by repair or tuning, replacement is an allowable H&S measure unless prevented by other guidance herein.

Maintain documentation justifying the replacement with a cost comparison between replacement and repair in the client file.

Replacement units must meet safety guidelines as determined in the Recipient Plan or technical Field Guide. See Air-Conditioning and Heating Systems section and Attachment A for more information.

Funding

DOE LIHEAP State Utility Other

DOE funds may be used to address this category

Testing Protocols

Combustion safety testing is required when combustion appliances are present.

Test naturally drafting appliances for spillage and CO during CAZ depressurization testing pre- and post-weatherization and before leaving the home on any day when work has been done that could affect draft (e.g., tightening the home, adding exhaust). **Pre, post, and in progress testing results should be recorded and kept in the client files.**

Inspect venting of combustion appliances and confirm adequate clearances.

Check DOE-approved audit to determine if the appliance can be justified as an ECM prior to replacement as an H&S measure.

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

Combustion Safety Test Action Levels

CO Test Result*	And/ OR	Spillage and Draft Test Results	Retrofit Action
0-25 ppm	And	Passes	Proceed with work
26-100 ppm	And	Passes	Recommend that the CO problem be fixed
26-100 ppm	And	Fails a worst case only	Recommend a service call for the appliance and/or repairs to the home to correct the problem
100-400 ppm	Or	Fails under natural conditions	STOP WORK: Work may not proceed until the system is serviced and the problem is corrected
>400 ppm	And	Passes	STOP WORK: Work may not proceed until the system is serviced and the problem is corrected
>400 ppm	And	Fails under any condition	EMERGENCY: Shut off fuel to the appliance and call for service immediately

Client Education

Provide client with combustion safety and hazards information.

Training

How to perform appropriate testing, determine when a building is excessively depressurized, and the difference between air free and as-measured CO.

CO action levels.

7.9 – Electrical

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

DOE funds may be used to address this category

What guidance do you provide Subrecipients for dealing with electrical hazards, including knob & tube wiring, in homes slated for weatherization?

Wires are inspected to ensure they are in good condition and not bare or frayed.
Service boxes and junction boxes are inspected to ensure they have secure covers.
Live knob and tube in the attic will not be covered or surrounded.
A dam that does not cover the top will be created to separate insulation from the wire path.
If the wiring is above the joists, an un-faced fiberglass batt must be installed below the wiring.
The balance of the attic may be blown to required insulation depth without covering any knob & tube. If the knob and tube wiring goes through the joists, do not insulate below the wiring, just create the dam. The additional cost of damming K&T wiring will be billed along with the ECM (i.e. insulation).
If the additional cost causes the ECM (i.e. insulation) to no longer be cost effective the home should be deferred until additional funding can be secured to address the K&T wiring issue.
Sidewalls with active knob and tube wiring will not be insulated.
How do you define “minor” or allowable electrical repairs, and at what point are repairs considered beyond the scope of weatherization?
The repair cost is attributed to the cost of the measure and becomes part of the SIR.
If the cost of the repair causes the measures SIR to drop below 1.0 then the measure cannot be completed and the unit may need to be deferred.
If priority lists are used, and these repairs are designated as Incidental Repairs, at what point is a site-specific audit required?
No priority lists are in use.
Client Education
When electrical issues are the cause of a deferral, provide information to client on over-current protection, overloading circuits, and basic electrical safety/risks.
Training
Auditors must be able to identify electrical hazards.
Auditors should be aware of local (or AHJ) code compliance.

7.10 – Formaldehyde, Volatile Organic Compounds (VOCs), Flammable Liquids, and other Air Pollutants				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
DOE funds may be used to address this category				

What guidance do you provide Subrecipients for dealing with formaldehyde, VOCs, flammable liquids, and other air pollutants identified in homes slated for weatherization?
Removal of pollutants is allowed and is required if they pose a risk to workers.
If pollutants pose a risk to workers and removal cannot be performed or is not allowed by the client, the unit must be deferred.
Refer to <i>Hazardous Materials Disposal</i> section for more information.
Testing Protocols
Sensory inspection.
Client Education
Inform client in writing of observed hazardous condition and associated risks.
Provide client written materials on safety issues and proper disposal of household pollutants.
When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.
Training
Auditors should be able to recognize potential hazards and when removal is necessary.

7.11 – Fuel Leaks
Concurrence, Alternative, or Deferral
Concurrence with Guidance <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/> Results in Deferral <input type="checkbox"/>
Funding
DOE <input checked="" type="checkbox"/> LIHEAP <input type="checkbox"/> State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input type="checkbox"/>
DOE funds may be used to address this category
Remediation Protocols
When a gas leak is found on the utility side of service, the utility service must be contacted before work may proceed.
Fuel leaks that are the responsibility of the client (vs. the utility) must be repaired before weatherizing a unit. Notify utilities and temporarily halt work when leaks are discovered that are the responsibility of the utility to address.
Test exposed gas lines for fuel leaks from utility coupling into, and throughout, the home.
Conduct sensory inspection on bulk fuels to determine if leaks exist.
How do you define allowable fuel leak repairs, and at what point are repairs considered beyond the scope of weatherization?
Fuel leak repairs of less than \$500.00 may be addressed with Health and Safety funding. If repairs are beyond this, use other sources of funding to address.
Client Education
Inform clients in writing if fuel leaks are detected.
Training
Auditors are trained to conduct fuel leak testing.

7.12 – Gas Ovens / Stovetops / Ranges				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
DOE funds may be used to address this category				
What guidance do you provide Subrecipients for addressing unsafe gas ovens/stoves/ranges in homes slated for weatherization?				
When testing indicates a problem, entities may perform standard maintenance on or repair gas cooktops and ovens.				
Replacement is not allowed.				
Testing Protocols				
Test gas ovens for CO.				
Inspect cooking burners and ovens for operability and flame quality.				
Client Education				
Inform clients of the importance of using exhaust ventilation when cooking and the importance of keeping burners clean to limit the production of CO.				
Training				
Auditors are trained on proper testing techniques.				
Auditors are aware of CO action levels listed in Section 7.8 above				

7.13 – Hazardous Materials Disposal [Lead, Refrigerant, Asbestos, Mercury (including CFLs/fluorescents), etc.]				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Hazardous Waste Materials generated in the course of weatherization work shall be disposed of according to all local laws, regulations and/or Federal guidelines, as applicable.				
Document proper disposal requirements in contract language with responsible party.				
Refer to Lead and Asbestos sections for more information on those topics.				
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
DOE funds may be used to address this category				
Client Education				
Inform client in writing of hazards associated with hazardous waste materials being generated/handled in the home.				

Training
Appropriate Personal Protective Equipment (PPE) for working with hazardous waste materials. Disposal requirements and locations.
Health and environmental risks related to hazardous materials.
Disposal Procedures and Documentation Requirements
Hazardous Waste Materials generated during weatherization work shall be disposed of according to all local laws, regulations and/or Federal guidelines, as applicable.
Documentation of proper disposal should be included in client file.

7.14 – Injury Prevention of Occupants and Weatherization Workers (Measures such as repairing stairs and replacing handrails)				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
DOE funds may be used to address this category				
What guidance do you provide Subrecipients regarding allowable injury-related repairs (e.g., stairs, handrails, porch deck board)?				
Workers must take all reasonable precautions against work on homes that will subject workers or occupant(s) to health and safety risks. Repairs and installation may be conducted only when necessary to effectively weatherize the home; otherwise these types of measures are not allowed. The auditors and workers on a job are to observe if dangers are present that may prevent completion of the weatherization work. Clients must be informed by auditors and/or workers of observed hazards and associated risks.				
How do you define “minor” or allowable injury prevention measures, and at what point are repairs considered beyond the scope of weatherization? Quantify “minor” or allowable injury prevention measures.				
Minor allowable injury prevention measures are measures that are small in scope but provide additional protection for workers and occupants from potential hazards.				
Injury prevention measures that cost over \$500.00 are not considered minor and are not allowable.				
Examples of minor allowable injury prevention may include but are not limited to repair/replacing a stair tread, repair/replacing a hand rail, securing attic ladder, etc.				
This does not allow for installing wheelchair ramps or items that do not relate directly to weatherization work.				
Training				
Auditors are trained in hazard identification.				

7.15 – Lead Based Paint

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

DOE funds may be used to address this category

Safe Work Protocols

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

Deferral is required when the extent and condition of lead-based paint in the house would potentially create further H&S hazards.

Only those costs directly associated with the testing and lead safe practices for surfaces directly disturbed during weatherization activities are allowable.

Minor Repair or Maintenance Activities: Activities that will disturb less than the following square feet of paint surfaces in 30 calendar days (counting all paint surface areas of a removed component):

- 6 square feet per room for interior activities; or
- 20 square feet for exterior activities.

But this exemption does **NOT** apply to the following:

- Window replacement.
- Demolition of painted surface areas.
- Using any of the following:
 - o Open-flame burning or torching;
 - o Machines to remove paint through high-speed operation without HEPA exhaust control; or
 - o Operating a heat gun at temperatures at or above 1100 degrees Fahrenheit

Mobile Homes:

Often, interiors of mobile homes were not painted but rather, paneling was applied to the surfaces. Therefore, pre-1978 mobile homes that were not painted by the manufacturer, occupant, landlord, or past owner of the unit before 1978, may be exempt from LSW. However, Weatherization Programs must verify the areas receiving weatherization services have never been painted or were painted for the first time after 1978. If this is not verifiable, then LSW protocols must be followed. Painted exterior surfaces on pre-1978 units should not be drilled, scraped, sanded, or receive any other work that disturbs the paint.

Testing Protocols

Testing to determine the presence of lead in paint that will be disturbed by WAP measure installation is allowed with EPA-approved testing methods.

LSW must be applied to all pre-1978 housing unless there is existing evidence that the home has been certified as being lead-free or below the lead threshold limit (e.g., for paint containing lead below the regulated level, 1.0 mg/cm² or 0.5% by weight). One of the following methods must be used to determine the paint to be disturbed is not lead-based paint:

- Written determination by certified lead inspector or risk assessor; or

- Proper use of EPA-recognized test kit provided agencies (*documenting manufacturer and model of test kit used, description and location of components tested, and test kit results*)

-A State-approved lead-based paint test protocol

Testing methods must be economically feasible and justified.

Job site set up and cleaning verification by a Certified Renovator is required.

Recipients must verify that crews are using lead safe work practices during monitoring.

Client Education

Follow pre-renovation education provisions for RRP.

Weatherization Subrecipients must provide a copy of the pamphlet, “The Lead-Safe Certified Guide to Renovate Right”, to owners and occupants of a dwelling built before 1978 to inform the household of the potential risk of the lead hazard exposure. Also, Subrecipients are required to have the client sign a form confirming receipt of the lead pamphlet and store that form in the client’s file.

If the Weatherization service provider cannot get a client signed acknowledgement, then the form will be signed by agency personnel signifying delivery of that pamphlet.

When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

Training and Certification Requirements

All employees and contractors working on pre-1978 homes must receive training to install measures in a lead-safe manner in accordance with the SWS and EPA protocols, and installation must be overseen by an EPA Certified Renovator.

In 2010, the Alabama Lead Contractor Certification Program received approval from the Alabama State Committee on Public Health to seek EPA authorization to administer and enforce the lead-based paint RRP rules for the State of Alabama in lieu of the EPA. The Renovation Contractor Certification, Chapter 420-3-29, establish requirements for certifying renovators, dust sampling technicians, and renovation firms. Further, these rules establish requirements for renovation project notifications, pre-renovation education requirements, renovation work practices, and for record keeping. Individuals seeking to become Certified Renovators and/or Dust Sampling Technicians in Alabama must apply through Alabama’s Safe State Environmental Program for accreditation.

Recipient Monitors and Inspectors will receive the certified Renovator Certification

Documentation Requirements

Documentation in the client file must include Certified Renovator certification; any training provided on-site; description of specific actions taken; lead testing and assessment documentation; and, photos of site and containment set up. Include the location of photos referenced if not in file.

Each client file also must contain Lead Safe Weatherization Exemption Worksheet which identifies units which will need to conduct Lead-Safe Work Practices.

7.16 – Mold and Moisture

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

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

DOE funds may be used to address this category

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

Water damage repairs that can be addressed by weatherization workers are allowed when necessary in order to weatherize the home and to ensure the long-term stability and durability of the measures. Source control (i.e. correction of moisture and mold creating conditions) is allowed when necessary in order to weatherize the home and to ensure the long-term stability and durability of the measures. Source control is independent of latent damage and related repairs.

Where severe Mold and Moisture issues cannot be addressed, deferral is required.

Extensive mold removal/cleanup is not an allowable H&S cost.

Surface preparation where weatherization measures are being installed (e.g., cleaning mold off window trim in order to apply caulk) must be charged as part of the ECM, not to the H&S budget category.

Visual assessment including exterior drainage. Mold testing is not an allowable cost.

Diagnostics such as moisture meters are recommended pre-weatherization and at the final inspection.

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

Allowable moisture related measures may include the repair of small (\$500.00) plumbing leaks and or structural leaks which are contributing to mold/moisture issues.

While generally mold removal/clean-up is not allowed areas smaller than 2 sq. ft. inside the unit and areas up to 10 sq. ft. outside may be addressed.

Issues beyond these parameters may result in the deferral of the unit until the issues can be addressed by either the homeowner or other funds.

Client Education				
Provide client written notification and disclaimer on mold and moisture awareness.				
Provide information on importance of cleaning and maintaining drainage systems.				
Provide information on proper landscape design and how this impacts site drainage and moisture control.				
When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.				
Training				
Assessors should be able to identify potential or existing mold and/or moisture issues.				
How to recognize drainage issues.				
7.17 – Pests				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>		Alternative Guidance <input type="checkbox"/>		Results in Deferral <input type="checkbox"/>
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
DOE funds may be used to address this category				
What guidance do you provide Subrecipients for dealing with pests and pest intrusion prevention in homes slated for weatherization?				
Pest removal is allowed only where infestation would prevent weatherization.				
Infestation of pests may be cause for deferral where it cannot be reasonably removed or poses H&S concern for workers.				
Screening of windows and points of access and incorporating pest exclusion into air sealing practices to prevent intrusion is allowed.				
Define Pest Infestation Thresholds, Beyond Which Weatherization Is Deferred				
The threshold for pest infestation is set at \$500.00.				
If the pest infestation cannot be addressed at or below this threshold it is considered beyond the scope of weatherization and the home must be deferred.				
Testing Protocols				
Auditors assess the degree of infestation and risk to worker.				
Client Education				
Inform client in writing of observed condition and associated risks.				
When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.				
Training				
Auditors are trained to assess the presence and degree of infestation, associated risks, and deferral policy.				

7.18 – Radon				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
DOE funds may be used to address this category				
What guidance do you provide Subrecipients around radon?				
Required (where applicable and to the fullest extent possible):				
<ul style="list-style-type: none"> • If exposed dirt floors are within the pressure/thermal boundary, cover with a sealed soil gas retarder • Where crawlspaces are present with exposed dirt, the unit’s floor will be sealed as a precaution and zonal pressure diagnostics will be used to determine if this is effective. If an effective separation cannot be achieved, cover exposed dirt with a sealed soil gas retarder. • Cover sump well/pits with airtight covers • Implement ventilation as required by ASHRAE 62.2-2016 				
Allowable:				
<ul style="list-style-type: none"> • 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. • Other precautions may include, but are not limited to, sealing any observed floor and/or foundation penetrations, isolating the basement from the conditioned space, and ensuring crawl space venting is installed and operable. 				
Prohibited:				
<ul style="list-style-type: none"> • Using DOE WAP H&S funds for radon mitigation 				
Testing Protocols				
The weatherization program in Alabama will not test for Radon.				
Client Education				
Provide all clients EPA’s A Citizen’s Guide to Radon and inform them of radon related risks.				
Informed consent form must include:				
<ul style="list-style-type: none"> - Information from the results of the IAQ Study that there is a small risk of increasing radon levels when building tightness is improved - A list of precautionary measures WAP will install based on EPA Healthy Indoor Environment Protocols - Some of the benefits of Weatherization including energy savings, energy cost savings, improved home comfort, and increased safety - Confirmation that EPA’s A Citizen’s Guide to Radon was received and radon related risks discussed with the client. 				
Training and Certification Requirements				

Auditors, assessors, and inspectors must have knowledge of radon, what it is and how it occurs, including what factors may make radon worse and precautionary measures that may be helpful.

Workers must be trained in proper vapor retarder installation.

A zonal map can be located at <http://www.epa.gov/radon/pdfs/zonemapcolor.pdf>

Documentation Requirements

Clients must sign a Radon Informed Consent Form prior to receiving weatherization services. This form must be kept in the client file.

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

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

DOE funds may be used to address this category

What is your policy for installation or replacement of the following:

Smoke Alarms:

Should be installed on each floor outside sleeping areas if operable alarms are not present.

Should be installed according to the manufacturer's instructions.

Carbon Monoxide Alarms:

Must be installed in every home if operable alarm is not present.

Should be installed according to manufacturer's instructions.

Fire Extinguishers:

May be installed when solid fuel is present.

Should be installed according to manufacturer's instructions.

Testing Protocols

Check existing alarms for operation.

Verify operation of installed alarms.

Client Education

Provide client with verbal and written information on use of devices installed.

Training

Auditors are trained on where to install alarms.

Auditors should be aware of local (or AHJ) code compliance.

7.20 – Occupant Health and Safety Concerns and Conditions

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
DOE funds may be used to address this category				
What guidance do you provide Subrecipients for soliciting the occupants' health and safety concerns related to components of their homes?				
All clients are required to sign a Health and Allergy Concerns Form which provides them with information about materials used in weatherization and instructs them to make arrangements so that they are not present during work which may aggravate health issues they may have.				
What guidance do you provide Subrecipients for determining whether occupants suffer from health conditions that may be negatively affected by the act of weatherizing their home?				
An important aspect of any inspection is client education. Once a clear understanding has been reached between the auditor and the client(s), work that will not aggravate any client pre-existing health condition shall begin. In some rare instances, a deferral may be required.				
What guidance do you provide Subrecipients for dealing with potential health concerns when they are identified?				
When a person's health may be at risk and/or the work activities could create a H&S hazard, the at-risk occupant will be required to take appropriate action based on the severity of the risk. Temporary relocation of at-risk occupants may be necessary. Failure or inability to take appropriate actions will result in a deferral.				
Client Education				
Inform client in writing of any known risks.				
Provide client with Subrecipient point of contact information in writing so client can inform of any issues.				
When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.				
Documentation Form(s) have been developed and comply with guidance? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>				

7.21 – Ventilation and Indoor Air Quality

Concurrence, Alternative, or Deferral		
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>
Funding		
DOE <input checked="" type="checkbox"/>	LIHEAP <input type="checkbox"/>	State <input type="checkbox"/>
Utility <input type="checkbox"/>	Other <input type="checkbox"/>	
DOE funds may be used to address this category		
Identify the Most Recent Version of ASHRAE 62.2 Implemented (optional: identify Addenda used)		
The Alabama Weatherization Assistance Program uses ASHRAE 62.2-2016		
Testing and Final Verification Protocols		

ASHRAE 62.2 evaluation to determine required ventilation.

When ensuring an effective garage separation, zonal pressure diagnostics should be done.

Measure fan flow of existing fans and of installed equipment to verify performance.

Testing to determine ventilation requirements prior to weatherization.

Follow up testing to ensure ventilation requirements were met.

Subrecipients are instructed to use the Residential Energy Dynamics (RED) ASHRAE 62.2-2016 calculator located at www.residentialenergydynamics.com

The use of balanced ventilation systems is encouraged.

Client Education

Provide client with information on function, use, and maintenance (including location of service switch and cleaning instructions) of ventilation system and components.

Provide client with equipment manuals for installed equipment.

Include disclaimer that ASHRAE 62.2 does not account for high polluting sources or guarantee indoor air quality.

Training

ASHRAE 62.2 training, including proper sizing, evaluation of existing and new systems.

Subrecipients are instructed to use the Residential Energy Dynamics (RED) ASHRAE 62.2-2016 calculator located at www.residentialenergydynamics.com

7.22 – Window and Door Repair and Replacement, Window Guards

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

DOE funds may be used to address this category

What guidance do you provide to Subrecipients regarding window and door repair and replacement and window guards?

Repair using H&S funds is allowed if:

- It resolves a bulk water intrusion issue that is the cause of visible biological growth and
- Is well documented with written explanation and photos of the biological growth in the client file.

Replacement of doors and widows is not allowed with H&S funds.

Window and door replacements shall not be included in the air sealing ECM

How do you define “minor” or allowable window and door repairs, and at what point are repairs considered beyond the scope of weatherization?
Repair cost is attributed to the cost of the measure and becomes part of the SIR. If the cost of the repair causes the measures SIR to drop below 1.0 then the measure cannot be completed, and the unit may need to be deferred.
Testing Protocols
N/A
Client Education
Provide written information on lead risks and mold wherever issues are identified.
Training
Awareness of guidance.

7.23 – Worker Safety (OSHA, etc.)
Concurrence, Alternative, or Deferral
Concurrence with Guidance <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/> Results in Deferral <input type="checkbox"/>
Workers must follow OSHA standards where required and take precautions to ensure the H&S of themselves and other workers.
All Subrecipients and contractors must maintain compliance with the current OSHA Hazard Communication Standard, including on-site organized Safety Data Sheets (SDS) (formerly called MSDS).
Funding
DOE <input checked="" type="checkbox"/> LIHEAP <input type="checkbox"/> State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input type="checkbox"/>
DOE funds may be used to address this category
How do you verify safe work practices? What is your policy for in-progress monitoring?
Recipients must verify that Subrecipients, crews and contractors follow safe work practices.
Training and Certification Requirements
Use and importance of PPE.
Safety training appropriate for job requirements.
OSHA 10-hour training meets this requirement and is an allowable use of T&TA funds for Subrecipient Staff and Contractors working in the program.
Ongoing training as required in Hazard Communication Program.