# State of Alabama

WEATHERIZATION ASSISTANCE PROGRAM

UNITED STATES DEPARTMENT OF ENERGY

BIPARTISAN INFRASTRUCTURE LAW STATE PLAN

(July 1, 2022 – June 30, 2027)



Submitted by:

State of Alabama Kay Ivey, Governor

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

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# Introduction

This document is the Alabama Weatherization Assistance Program (WAP) State Plan for the Bipartisan Infrastructure Law (BIL) funding. The project period for the BIL is July 1, 2022 to June 30, 2027.

The Alabama Department of Economic and Community Affairs 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 BIL 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 BIL 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.

Total Average Cost Per Dwelling \$6,122.57 Health and Safety average expenditure per home \$1,295.00

- o Average Cost Per Unit is capped at \$8,009.00
- Quality Control Inspector final inspection is required
- o Training and Technical assistance funds are available to obtain certification and receive required CEU's
- o Total administrative limit is 15%

OMB Number: 4040-004 Expiration Date: 10/31/2019

APPLICATION FOR FEDERAL ASSISTANCE SF-424 Version 02					
Type of Submission:     Preapplication     Application     Changed/Corrected Application	2. Type of Application:     New     Continuation     X Revision	Increase Award			
3. Date Received 03/10/2022		4. Applicant Identifier:			
5a. Fed Entity Identifier:		5b. Federal Award Identifier: DE-EE0009970 (SF424 revision 1)			
State Use Only:					
6. Date Received by State: 03/10/2022		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:		Division Name:			
AL Dept of Economic and Community Affairs (ADECA)		Energy			
f. Name and contact information of person to be contacted	on matters involving this	application:			
Prefix: Mr First Na Middle Name:  Last Name: Wilson  Suffix:	me: Derek				
Title: State Weatherization Program Administr	ator				
Organizational Affiliation: State of Alabama - Dept of	of Economic and Communi	ty Affairs			
Telephone Number: 3342425373		Fax Number:			
Email: derek.wilson@adeca.alabama.gov					

OMB Number: 4040-004 cpiration Date: 10/31/2019

APPLICATION FOR FEDERAL ASSISTANCE SF-424	Expiration Date: 10/31/2019  Version 02
9. Type of Applicant:	
A State Government	
0. Name of Federal Agency:	
U. S. Department of Energy	
11. Catalog of Federal Domestic Assistance Number:	
81.042	
CFDA Title:	
Weatherization Assistance Program: Bipartisan Infrastructure Law	
12. Funding Opportunity Number:	
DE-WBI-0002022	
Title:	
2022 WAP Bipartisan Infrastructure Law	
13. Competition Identification Number:	
Title:	
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	

OMB Number: 4040-004 Expiration Date: 10/31/2019

APPLICATION FOR FEDERAL	ASSISTANCE SF-424			Version 02
16.Congressional District Of:				
a. Applicant: Alabama Congres	esional District 02	b. Program/Project:	AL-Statewide	
Attach an additional list of Program/Pr	roject Congressional Districts if needed:			
17. Proposed Project: a. Start Date: 07/01/2022		b. End Date:	06/30/2027	
18. Estimated Funding (\$):				
a. Federal	0.00			
b. Applicant	0.00			
c. State	0.00			
d. Local	0.00			
e. Other	0.00			
f. Program Income	0.00			
g. TOTAL	0.00			
a. This application was made ava	y State Under Executive Order 12372 Processial all able to the State under the Executive Order 372 but has not been selected by the State for 0. 12372	er 12372 Process for review		
20. Is the applicant Delinquent On Any	r Federal Debt? (If "Yes", provide explanati	on)		
statements herein are true, complete and accurate to  X IAGREE	y (1) to the statements contained in the list e to the best of my knowledge. I also provid ces, or an internet site where you may obtain	de the required assurances*	* and agree	
Authorized Representative:				
Prefix: Mr	First Name: Kenneth			
Middle Name: W.	Tilst Name.			
Last Name: Boswell				
Suffix:				
Title: Director				
Telephone Number: 3342425591		Fax Number:		
-	oswell@adeca.alabama.gov			
Signature of Authorized Representative Authorized for Local Reproduction			Date Signed:	03/10/2023  Standard Form 424 (Revised 10/2005) Prescribed by OMB Circular A-102

# **BUDGET INFORMATION - Non-Construction Programs**

Program/Project Identification No.     EE0009970		2. Program/Project Title Weatherization Assistance Program: Bipartisan Infrastructure Law		
3. Name and Address State of Alabama			4. Program/Project Start Date	07/01/2022
	401 Adams Avenue - Suite 560 Montgomery, AL 361035690		5. Completion Date	06/30/2027

SECTION A - BUDGET SUMMARY							
Grant Program		Estimated Uno	bligated Funds	N	New or Revised Budg	get	
Function or Activity (a)	Federal Catalog No. (b)	Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)	
1. Federal	81.042	\$ 0.00		\$ 47,489,502.00		\$ 47,489,502.00	
2.							
3.							
4.							
5. TOTAL		\$ 0.00	\$ 0.00	\$ 47,489,502.00	\$ 0.00	\$ 47,489,502.00	

SECTION B - BUDGET CATEGORIES							
6. Object Class Categories		Grant Program, Function or Activity			Total		
	(1) GRANTEE ADMINISTRATI ON	(2) SUBGRANTEE ADMINISTRATI ON	(3) GRANTEE T&TA	(4) SUBGRANTEE T&TA	(5)		
a. Personnel	\$ 81,107.00	\$ 0.00	\$ 413,204.00	\$ 0.00	\$ 494,311.00		
b. Fringe Benefits	\$ 36,055.00	\$ 0.00	\$ 177,767.00	\$ 0.00	\$ 213,822.00		
c. Travel	\$ 0.00	\$ 0.00	\$ 153,550.00	\$ 0.00	\$ 153,550.00		
d. Equipment	\$ 0.00	\$ 0.00	\$ 100,000.00	\$ 0.00	\$ 100,000.00		
e. Supplies	\$ 0.00	\$ 0.00	\$ 10,000.00	\$ 0.00	\$ 10,000.00		
f. Contract	\$ 0.00	\$ 5,475,436.00	\$ 7,318,770.00	\$ 144,000.00	\$ 44,276,992.00		
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00		
h. Other Direct Costs	\$ 36,000.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 746,000.00		
i. Total Direct Charges	\$ 153,162.00	\$ 5,475,436.00	\$ 8,173,291.00	\$ 144,000.00	\$ 45,994,675.00		
j. Indirect Costs	\$ 1,494,827.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 1,494,827.00		
k. Totals	\$ 1,647,989.00	\$ 5,475,436.00	\$ 8,173,291.00	\$ 144,000.00	\$ 47,489,502.00		
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00		

# **BUDGET INFORMATION - Non-Construction Programs**

Program/Project Identification No.     EE0009970		2. Program/Project Title Weatherization Assistance Program: Bipartisan Infrastructure Law		
3. Name and Address State of Alabama			4. Program/Project Start Date	07/01/2022
	401 Adams Avenue - Suite 560 Montgomery, AL 361035690		5. Completion Date	06/30/2027

SECTION A - BUDGET SUMMARY							
Grant Program		Estimated Unc	bligated Funds	Λ	New or Revised Budg	get	
Function or Activity (a)	Federal Catalog No. (b)	Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)	
1.							
2.							
3.							
4.							
5. TOTAL		\$ 0.00	\$ 0.00	\$ 47,489,502.00	\$ 0.00	\$ 47,489,502.00	

SECTION B - BUDGET CATEGORIES							
6. Object Class Categories		Grant Program, F	unction or Activity		Total		
	(1) PROGRAM OPERATIONS	(2) HEALTH AND SAFETY	(3) LIABILITY INSURANCE	(4) FINANCIAL AUDITS	(5)		
a. Personnel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 494,311.00		
b. Fringe Benefits	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 213,822.00		
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 153,550.00		
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 100,000.00		
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 10,000.00		
f. Contract	\$ 24,490,286.00	\$ 5,180,000.00	\$ 86,500.00	\$ 82,000.00	\$ 44,276,992.00		
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00		
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 710,000.00	\$ 0.00	\$ 746,000.00		
i. Total Direct Charges	\$ 24,490,286.00	\$ 5,180,000.00	\$ 796,500.00	\$ 82,000.00	\$ 45,994,675.00		
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 1,494,827.00		
k. Totals	\$ 24,490,286.00	\$ 5,180,000.00	\$ 796,500.00	\$ 82,000.00	\$ 47,489,502.00		
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00		

# **BUDGET INFORMATION - Non-Construction Programs**

1. Program/Project Identification No. EE0009970		2. Program/Project Title Weatherization Assistance Program: Bipartisan Infrastructure Law		
3. Name and Address State of Alabama			4. Program/Project Start Date	07/01/2022
	401 Adams Avenue - Suite 560 Montgomery, AL 361035690		5. Completion Date	06/30/2027

SECTION A - BUDGET SUMMARY							
Grant Program		Estimated Unc	bligated Funds	Ν	New or Revised Budg	get	
Function or Activity (a)	Federal Catalog No. (b)	Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)	
1.							
2.							
3.							
4.							
5. TOTAL		\$ 0.00	\$ 0.00	\$ 47,489,502.00	\$ 0.00	\$ 47,489,502.00	

SECTION B - BUDGET CATEGORIES					
6. Object Class Categories	Grant Program, Function or Activity			Total	
	(1) VEHICLES AND EQUIPMENT	(2)	(3)	(4)	(5)
a. Personnel	\$ 0.00				\$ 494,311.00
b. Fringe Benefits	\$ 0.00				\$ 213,822.00
c. Travel	\$ 0.00				\$ 153,550.00
d. Equipment	\$ 0.00				\$ 100,000.00
e. Supplies	\$ 0.00				\$ 10,000.00
f. Contract	\$ 1,500,000.00				\$ 44,276,992.00
g. Construction	\$ 0.00				\$ 0.00
h. Other Direct Costs	\$ 0.00				\$ 746,000.00
i. Total Direct Charges	\$ 1,500,000.00				\$ 45,994,675.00
j. Indirect Costs	\$ 0.00				\$ 1,494,827.00
k. Totals	\$ 1,500,000.00				\$ 47,489,502.00
7. Program Income	\$ 0.00				\$ 0.00

# U.S. Department of Energy BUDGET INFORMATION REMARKS

(Grant Number: EE0009970)

# Remarks

Upon verification of the application, a validation warning/error populates stating that the Annual File Total Subgrantee Allocation does not match the WAP Budget Categories.

The Annual File Total Subgrantee Allocation includes \$1,500,000.00 for subrecipient equipment (vehicles) but does **not** include \$710,000.00 that is embedded in Liability Insurance in the WAP Budget Categories. The State of Alabama budgets \$710,000.00 for Pollution Occurrence Insurance for all subrecipients.

# **U.S. DEPARTMENT OF ENERGY**



# **BUDGET JUSTIFICATION FOR FORMULA GRANTS**

Applicant: State of Alabama

Budget period: 07/01/2022 - 06/30/2027

Award number: EE0009970

 <u>PERSONNEL</u> - 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).

Position	Description of Duties of Professionals
Planning & Economic Development Specialist II - TF	Serves as Weatherization Program Manager The Weatherization Program Manager position is responsible for one-third 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 2023 DOE funds, WAPBIL funds, and 2023 LIWAP funds. Year 1 Salary: \$51,952.80 Year 2 Salary: \$54,525.60 Year 3 Salary: \$57,259.20 Year 4 Salary: \$60,175.20 Year 5 Salary: \$63,175.20 Total Salary for 5-year BIL period: \$287,088.00
Planning & Economic Development Specialist I - JM	Serves as Weatherization Program Manager The Weatherization Program Manager position is responsible for one-third 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 2023 DOE funds, WAPBIL funds, and 2023 LIWAP funds. Year 1 Salary: \$35,092.80 Year 2 Salary: \$36,876.00 Year 3 Salary: \$38,709.60 Year 4 Salary: \$43,788.00 Year 5 Salary: \$45,981.60 Total Salary for 5-year BIL period: \$200,448.00
Planning & Economic Development Specialist I - LC	Serves as Weatherization Program Manager The Weatherization Program Manager position is responsible for one-third 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 2023 DOE funds, WAPBIL funds, and 2023 LIWAP funds. Year 1 Salary: \$47,104.80 Year 2 Salary: \$54,525.60 Year 3 Salary: \$57,259.20 Year 4 Salary: \$60,175.20 Year 5 Salary: \$63,175.20 Total Salary for 5-year BIL period: \$282,240.00
Planning & Economic Development Specialist III - DW	Serves as 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 and organizing workshops and trainings for subrecipients, developing State Plans, scheduling and conducting public hearings, and assembling the grant budget. The balance of salary and benefits is paid using 2023 DOE funds (T&TA and Admin), WAPBIL funds, and

2023 LIWAP funds. Year 1 Salary: \$53,224.80 Year 2 Salary: \$55,855.20 Year 3 Salary: \$58,692.00 Year 4 Salary: \$61,660.80 Year 5 Salary: \$64,735.20 Total Salary for 5-year BIL period: \$294,168.00

Budget Justification EE0009970

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 2023 DOE funds, WAPBIL funds, 2023 LIWAP funds, LIHEAP funds, and CSBG funds. Year 1 Salary: \$61,660.80 Year 2 Salary: \$64,735.20 Year 3 Salary: \$67,972.80 Year 4 Salary: \$71,412.00 Year 5 Salary: \$75,086.40 Total Salary for 5-year BIL period: \$340.867.20

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 2023 DOE funds, WAPBIL funds, 2023 LIWAP funds, LIHEAP funds, CSBG funds, and other non-WAP funds. Year 1 Salary: \$25,456.80 Year 2 Salary: \$26,740.80 Year 3 Salary: \$28,084.80 Year 4 Salary: \$29,496.00 Year 5 Salary: \$30,991.20 Total Salary for 5-year BIL

period: \$140,769.60

### **Direct Personnel Compensation:**

Position	Salary/Rate	Time	Direct Pay
Planning & Economic Development Specialist II - TF	\$287,088.00	40.0000 % FT	\$114,835.20
Planning & Economic Development Specialist I - JM	\$200,448.00	40.0000 % FT	\$80,179.20
Planning & Economic Development Specialist I - LC	\$282,240.00	40.0000 % FT	\$112,896.00
Planning & Economic Development Specialist III - DW	\$294,168.00	40.0000 % FT	\$117,667.20
Planning & Economic Development Specialist IV - NN	\$340,867.20	15.0000 % FT	\$51,130.08
Administrative Support Assistant I	\$140,769.60	12.5053 % FT	\$17,603.66
		Direct Pay Total	\$494,311.34

#### 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**: July 2022 - June 2027: 7.65% **Retirement**: (RSA Tier 2) 14.44%

Health Insurance: \$930.00/month = \$11,160.00/year x 5 years = \$55,800.00 PEDS IV (NN): \$55,800.00 (15%) = \$8,370.00 / \$51,130.80 = 16.3700% PEDS III (DW): \$55,800.00 (40%) = \$22,320.00 / \$117,667.20 = 18.9688% PEDS II (TF): \$55,800.00 (40%) = \$22,320.00 / \$114,835.20 = 19.4365% PEDS I (LC): \$55,800.00 (40%) = \$22,320.00 / \$112,896.00 = 19.7704% PEDS I (JM): \$55,800.00 (40%) = \$22,320.00 / \$80,179.20 = 27.8376% ASA I: \$55,800.00 (12.5%) = \$6,977.96 / \$17,603.66 = 39.6392%

Average Fringe Rate = 54.9125%

Budget Justification EE0009970

### Fringe Benefits Calculations

Position	Direct Pay	Rate	Benefits
Planning & Economic Development Specialist II - TF	\$114,835.20	41.5266 %	\$47,687.15
Planning & Economic Development Specialist I - JM	\$80,179.20	49.9276 %	\$40,031.55
Planning & Economic Development Specialist I - LC	\$112,896.00	41.8604 %	\$47,258.72
Planning & Economic Development Specialist III - DW	\$117,667.20	41.0589 %	\$48,312.86
Planning & Economic Development Specialist IV - NN	\$51,130.08	38.4600 %	\$19,664.63
Administrative Support Assistant I	\$17,603.66	61.7292 %	\$10,866.60
		Fringe Benefits Total	\$213,821.51

#### 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.

	Number	Cost Per	
Purpose of Trip	of Trips	Trip	Total
Monitoring and T&TA - Fuel	150	\$100.00	\$15,000.00
Monitoring and/or T&TA - Day Trips Per Diem (less than 6 hours)	40	\$0.00	\$0.00
Monitoring and/or T&TA - Day Trips Per Diem (6+ hours)	200	\$12.75	\$2,550.00
Monitoring and/or T&TA - Overnight Per Diem	100	\$400.00	\$40,000.00
Out of State Travel for Conferences, Training, etc.	30	\$3,200.00	\$96,000.00
		Travel Total	\$153,550.00

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 75,000 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 100 4-night trips throughout the grant cycle.

Monitoring and/or T&TA - Day Trips Per Diem (6+ hours): Estimates are based on making 200 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 40 partial day trips throughout the grant cycle.

Out of State Travel for Conferences, Trainings, etc.: Estimates are based off of making 30 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.

**Budget Justification** EE0009970

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.

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

Equipment	Unit Cost	Number	<b>Total Cost</b>	Justification of Need
Vehicle Purchase	\$50,000.00	2	\$100,000.00	Vehicles for monitoring purposes. 100%
				dedicated to DOE
	Equi	pment Total	\$100,000.00	

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.

ADECA is proposing to purchase two trucks for monitoring purposes and estimates they will each cost around \$50,000.00. The trucks, once purchased, will be used solely for the Weatherization Assistance Program by WAP staff. Currently WAP staff have access to one older truck that must be shared amongst four (4) program staff members for monitoring and T&TA purposes.

- 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
Tools and Supplies	\$2,000.00	Various small tools and supplies needed conduct monitoring activities and for subrecipients to perform energy audits, inspections, etc.
Materials for Training Events	\$4,000.00	Materials such as binders, folders, markers, boards, etc. for training purposes.
Calibration of Testing Equipment	\$4,000.00	Calibration of testing equipment to ensure accurate readings.
Materials and Supplies Total	\$10,000.00	

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.

Costs estimated based on prior prices and researched estimates.

6. CONTRACTS AND SUBGRANTS - Provide the following information for New proposed subrecipients and subcontractors. For o else be fo

Name of Proposed Sub	Total Cost	Basis of Cost*	
found (i.e weatherization subgrants, Annual File section IV.1).			
ewhere in the application; under Name of Proposed Sub, indicate	te purpose of work and	I where additional information ca	an
ongoing subcontractors and subrecipients, this information doe	s not have to be restat	ted here, if it is provided	

Contract Consultant - Statewide T&TA Coordinator \$6,318,768.00 Selection will be procured through Request for Proposals process during third quarter of 2022

program year for a consultant to prepare a training needs assessment, develop a customized training plan, and implement the approved plan. Funds allocated to this contract include T&TA funding for each of the subrecipients. Instead of procuring and paying for their own trainings, they will go through the T&TA Coordinator who will handle the logistics and payment.

Budget Justification EE0009970

Contract Consultant - Quality Control Inspector (QCI)	\$1,000,000.00	This includes funds to acquire and maintain a QCI certified contractor(s) to assist the State Administering Agency with technical monitoring requirements.
Weatherization Subrecipients (Annual File section IV.1)	\$36,958,224.00	This includes allocations for: administration, program operations, health and safety, liability insurance, training and technical assistance, financial audit, and vehicles and equipment.
Contracts and Subgrants Total	\$44,276,992.00	

<sup>\*</sup>For example, Competitive, Historical, Quote, Catalog

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

General Description		Cost	Justification of Need
Office Furnishings		\$36,000.00	Allocated portion of expense for office furnishings for Weatherization Assistance Program staff.
Pollution Occurrence Insurance		\$710,000.00	To insure recipient (SAA) and subrecipients against liability related to claims of pollution occurrence incidents.
	Other Direct Costs Total	\$746 000 00	

 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.

\$710,000.00 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. \$36,000.00 has been budgeted to purchase office furnishings needed to create adequate workspaces for WAP staff

All costs 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.
- 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 latest agreement for the provisional indirect cost rate was made on October 1, 2021. The agreement was made between the United States Department of Labor, the Federal Cognizant Agency, and the Alabama Department of Economic and Community Affairs.

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

Name: Margie Merced Phone Number: 2026934104

Indirect costs calculations:

Indirect Cost Account	Direct Total	Indirect Rate	lotal Indirect
Provisional - ADECA-ED (Energy Division) 10/1/21-9/30/22	\$45,994,675.00	3.2500 %	\$1,494,826.94
		Indirect Costs Total	\$1,494,826,94

<sup>7. &</sup>lt;u>OTHER DIRECT COSTS</u> - 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.

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

(Grant Number: EE0009970, State: AL, Program Year: 2022)

# IV.1 Subgrantees

Subgrantee (City)	Planned Funds/Units
Alabama Council on Human Relations, Inc. (Auburn)	\$1,520,564.00
Theodist Coulon on Figure 10 and 10 a	162
Central Alabama Regional Planning and Development Commission (CARPDC) (Montgomery)	\$3,291,271.00
, , , , , , , , , , , , , , , , , , , ,	\$62
Community Action Agency of Northeast Alabama, Inc (Rainsville)	\$8,174,291.00 908
	\$1,376,797.00
Community Action Agency of Northwest Alabama, Inc. (Florence)	144
	\$2,375,694.00
Community Action Agency of South Alabama, Inc. (Daphne)	249
Community Astion Armon of Talladara Clay Dandalah Callaga and Claboura Counties (Talladara)	\$1,916,533.00
Community Action Agency of Talladega, Clay, Randolph, Calhoun and Cleburne Counties (Talladega)	205
Community Action Committee, Inc. of Chambers-Tallapoosa-Coosa (Dadeville)	\$743,567.00
Community Action Communice, inc. of Chambers-Tanapoosa-Coosa (Dadevine)	73
Community Action Partnership of Huntsville/ Madison and Limestone Counties, Inc. (Huntsville)	\$2,538,557.00
	276
Community Action Partnership of North Alabama, Inc. (Decatur)	\$2,555,216.00 288
	\$2,648,426.00
Community Service Programs of West Alabama, Inc (Tuscaloosa)	\$2,048,420.00
	\$4,043,119.00
Mobile Community Action, Inc. (Mobile)	430
	\$2,190,468.00
Montgomery County Commission, c/o Central Alabama Regional Planning and Development Commission (Montgomery)	247
Organized Community Action Program Ing. (Tray)	\$3,583,719.00
Organized Community Action Program, Inc. (Troy)	376
Total:	\$36,958,222.00
A O WILL	4,000

# **IV.2 WAP Production Schedule**

Wea	Units				
Tot	4,000				
Rev	0				
Ave	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	\$1,500,000.00			
В	Total Units Weatherized	4,000			
C	Total Units Reweatherized	0			
D	Total Dwelling Units to be Weatherized and Reweatherized (B + C)	4,000			
Е	Average Vehicles & Equipment Acquisition Cost per Unit (A divided by D)	\$375.00			
A	AVERAGE COST PER DWELLING UNIT (DOE RULES)				
F	Total Funds for Program Operations	\$24,490,286.00			
G	Total Dwelling Units to be Weatherized and Reweatherized (from line D)	4,000			

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

(Grant Number: EE0009970, State: AL, Program Year: 2022)

I Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$375.00
J Total Average Cost per Dwelling (H plus I)	\$6,497.57

### **IV.3 Energy Savings**

	Units	Savings Calculator (MBtus)	Energy Savings
This Year Estimate	4000	29.3	117200
Prior Year Estimate	425	29.3	12452
Prior Year Actual	546	29.3	15998

## **IV.4 DOE-Funded 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 and will be available for weatherization activities during the Bipartisan Infrastructure Law (BIL) performance period.

In accordance with 440.14 (b)(9)(xiv), the State of Alabama encourages subgrantees to utilize private resources to increase the amount of assistance to eligible clients. No State funds are available for weatherization projects and since all of the subgrantees 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 commision serves in this category and add name below

	Type of organization:	Non-profit (not a financial institution)
Mr. Antwon Prince Scalay	Contact Name:	Mr. Antwon Prince-Sealy
Mr. Antwon Prince-Sealey	Phone:	2054690397
	Email:	aprince@cspwal.com
	Type of organization:	Non-profit (not a financial institution)
Mr. Donny Barbar	Contact Name:	Donny Barber
Mr. Donny Barber	Phone:	3342624300
	Email:	dbarber@carpdc.com
	Type of organization:	Non-profit (not a financial institution)
Mr. Kris Rowe	Contact Name:	Kris Rowe
IVII. KIIS KOWE	Phone:	2052277688
	Email:	krowe@caaalabamaorg.com
	Type of organization:	Non-profit (not a financial institution)
Mr. Luke Laney	Contact Name:	Luke Laney
Wii. Luke Lailey	Phone:	2566384430
	Email:	luke@caaneal.org
	Type of organization:	Unit of State Government
Mr. Scott Stabler	Contact Name:	Scott Stabler
Wif. Scott Stabler	Phone:	3343588712
	Email:	scott.stabler@adss.alabama.gov
		Non-profit (not a financial institution)
Ms. Delores Mastin	Contact Name:	Delores Mastin
Wis. Delotes Mastin	Phone:	2567041641
	Email:	dmastin@caa-htsval.org
		Unit of State Government
Ms. Marquita Lennon	Contact Name:	Marquita Lennon
ivis. iviaiquita Ecilion	Phone:	3342422698
	Email:	marquita.lennon@psc.alabama.gov

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

(Grant Number: EE0009970, State: AL, Program Year: 2022)

	Type of organization:	: Utility	
Ma Tanasanila Cassan	Contact Name:		ĺ
As. Tanganyika Grayson	Phone:	2052572357	ĺ
	Email:	tgrayso@southernco.com	ĺ
	Type of organization:	: Unit of State Government	l
Ma Wanda Liulaa	Contact Name:	Wendy Littles	l
Ms. Wendy Littles	Phone:	3343533375	ĺ
	Email:	Wendy.Littles@adeca.alabama.gov	ĺ

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

I	Date Held	Newspapers that publicized the hearings and the dates the notice ran
08	3/23/2022	Notice was posted on August 12, 2022 on the Secretary of State Website as required by the Alabama Open Meetings Act. The virtual public hearing will be held on August 23, 2022.
08	3/23/2022	Notice for the public hearing was published in the Montgomery Independent on August 11, 2022 and also in the Mobile Press Register and the Birmingham News on August 12, 2022. The virtual public hearing will be held on August 23, 2022.

#### IV.7 Miscellaneous

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.

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 is also posted in newspapers throughout the State. Notices are attached.

Additionally subgrantees are notified of a public hearing by email and standard mail.

Recipient Principal Investigator: Derek Wilson E-mail: derek.wilson@adeca.alabama.gov

Phone: 334-242-5373

Recipient Business Officer: Kenneth W. Boswell, Director

E-mail: kenneth.boswell@adeca.alabama.gov

Phone: 334-242-5594

# Davis Bacon Act Compliance:

In accordance with Section 40551, subpart (b) of the Bipartisan Infrastructure Law, any WAPBIL funded weatherization work on multifamily buildings with no fewer than 5 units will be required to pay wages to all laborers and mechanics engaged in the construction, alteration, or repair of those multifamily buildings (whether employed by a contractor or subcontractor) wages "at rates not less than those prevailing on similar projects in the locality, as determined by the Secretary of Labor."

DOE will issue additional guidance regarding the prevailing wage requirements and KWAP will incorporate future guidance into program policies, management, and monitoring. Since the Davis Bacon requirement only applies to multifamily units and WAPBIL funding, to avoid triggering the extra work of Davis Bacon compliance, Alabama WAP anticipates prioritizing multifamily projects for non-WAPBIL funding sources (annual DOE allocation, LIEAP, etc.).

# **Buy American Provisions:**

The BIL included a new "Buy America, Build America" section which created a number of new responsibilities and requirements, including a new—permanent-Buy American domestic preference requirement for all iron, steel, manufactured products, and construction materials used in certain financial assistance projects.

DOE will issue additional guidance regarding the requirements and applicability, as well as the possibility for applying for a special waiver. Alabama WAP will incorporate future guidance into program policies and management.

OMB Control No: 1910-5127 Expiration Date: 05/31/2023

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

(Grant Number: EE0009970, State: AL, Program Year: 2022)

### U.S. Department of Energy

# WEATHERIZATION ASSISTANCE PROGRAM SUBGRANTEE INFORMATION

State: AL Grant Number: EE0009970 Program Year: 2022

Tina Evans Name: Alabama Council on Human Relations, Inc. Contact:

> NM15TJNTXJM8 UEI: 183860386 DUNS:

> > CD

CD

950 Shelton Mill Rd (334) 821-8336 Address: Phone:

PO Drawer 3770 (334) 826-6397 Fax:

Auburn, AL 36831-0409 tina.evans@achr.com Email:

Counties LEE County Tentative allocation: \$1,520,564.00

Congressional served: AL-03 162 districts served: Planned units:

Type of organization: Non-profit organization

Source of labor: Contractors

Mr. Donny Barber Name: Central Alabama Regional Planning and Development Commissio Contact:

TNC1GLG9Z6U6 UEI:

781377734 DUNS: Address: 430 South Court Street Phone: (334) 262-4300

Montgomery, AL 36104-4102 (334) 262-6976 Fax:

> dbarber@carpdc.com Email:

**ELMORE County** Counties Tentative allocation: \$3,291,271.00 served:

Congressional **AUTAUGA County** AL-02 districts served: 362 Planned units:

SHELBY County Type of organization: Non-profit organization DALLAS County MACON County

RUSSELL County PERRY County **CHILTON County** 

JEFFERSON County

Address:

Source of labor: Contractors

Ms. Tyesha Yarbrough Name: Community Action Agency of Northeast Alabama, Inc Contact:

HSXZK11LPLJ5 UEI: 948061619 DUNS: 1481 McCurdy Avenue, South Phone: (256) 638-4430 PO Box 1487 (256) 638-2039

Fax:

Rainsville, AL 35986-1487 Email: tyesha@caaneal.org **ETOWAH County** 

Counties CD Tentative allocation: \$8,174,291.00 Congressional MARSHALL County AL-04 served: Planned units: 908 districts served:

CHEROKEE County Type of organization: Local agency

ST. CLAIR County **BLOUNT County DEKALB** County

JACKSON County Source of labor: Contractors

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served:

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## U.S. Department of Energy

# WEATHERIZATION ASSISTANCE PROGRAM SUBGRANTEE INFORMATION

State: AL Grant Number: EE0009970 Program Year: 2022

Name: Community Action Agency of Northwest Alabama, Inc.

Contact: Mr. Jay Hendricks

UEI: TJGCN43BLB25

DUNS: 135457047

Address: 745 Thompson Street Phone: (256) 383-3832 Florence, AL 35630-3867 Fax: (256) 766-4367

Email: j.hendricks@caanw.org

Congressional

districts served:

Congressional

CD

AL-05

CD

CD

Counties COLBERT County

FRANKLIN County

LAUDERDALE County

Tentative allocation: \$1,376,797.00

Planned units: 144

Type of organization: Local agency

Source of labor: Contractors

Name: Community Action Agency of South Alabama, Inc.

Contact: Mr. James McPherson

UEI: LJCFLSSH88E1 DUNS: 082145368

Address: 26440 Pollard Road Phone: (251) 626-26461013

PO Box 250 Fax: (251) 626-2613

Daphne, AL 36526-0250 Email: james.mcpherson@caaofsa.org

Counties MARENGO County
Tentative allocation: \$2,375,694.00

served: BALDWIN County Planned units: 249 districts served: AL-01

CONECUH County

MONROE County

Type of organization: Local agency

WILCOX County CLARKE County ESCAMBIA County

Source of labor: Contractors

Name: Community Action Agency of Talladega, Clay, Randolph, Calhoun Contact: Mr. Steinway Cash

UEI: KZEPNYBRARE9 DUNS: 105370493

Address: 136 North Court Street Phone: (256) 268-8042

PO Box 278 Fax: (256) 474-0854

Talladega, AL 35161-0278 Email: steinway@caatcrcc.org

Counties TALLADEGA County Tentative allocation: \$ 1,916,533.00 Congressional

served: CLEBURNE County Planned units: 205 districts served: AL-03

RANDOLPH County

CLAY County

Type of organization: Local agency

CALHOUN County

Source of labor: Contractors

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### U.S. Department of Energy

# WEATHERIZATION ASSISTANCE PROGRAM SUBGRANTEE INFORMATION

State: AL Grant Number: EE0009970 Program Year: 2022

Name: Community Action Committee, Inc. of Chambers-Tallapoosa-Coos Mr. Kevin Walker Contact: G8RJR6L5LJK3 UEI: DUNS: 607565652 Address: 170 South Broadnax Street Phone: (256) 825-4287 Dadeville, AL 36853-1704 (256) 825-4280 Fax: kwalker@ctccac.com Email: Counties TALLAPOOSA County CD Tentative allocation: \$ 743,567.00 Congressional COOSA County AL-03 served: districts served: Planned units: CHAMBERS County Type of organization: Non-profit organization Source of labor: Contractors Name: Community Action Partnership of Huntsville/ Madison and Limes Mr. Steve Gentry Contact: KJ1KJ9J1MUD1 UEI: 078971595 DUNS: 3516 Stringfield Road, NW (256) 851-9800 Address: Phone: P.O. Box 3975 (256) 851-9803 Fax: Huntsville, AL 35810-0975 Email: sgentry@caa-htsval.org MADISON County Counties CD Tentative allocation: \$ 2,538,557.00 Congressional LIMESTONE County AL-05 served: districts served: Planned units: 276 Type of organization: Local agency Source of labor: Contractors Ms. Angela Ingram Name: Community Action Partnership of North Alabama, Inc. Contact: CWA3M48K2KQ3 UEI: 082065335 DUNS: 1909 Central Parkway, SW (256) 260-3116 Address: Phone: Decatur, AL 35601-6822 (256) 355-7953 Fax: angela.ingram@capna.org Email: MORGAN County Counties CD Tentative allocation: \$2,555,216.00 Congressional LAWRENCE County AL-04 served: 288 districts served: Planned units: WALKER County Type of organization: Local agency WINSTON County MARION County **CULLMAN County** Source of labor: Contractors

Name: Community Service Programs of West Alabama, Inc

Contact: Ms. Cynthia Burton

UEI: GKJYK54UUW87 DUNS: 144583499

Address: 601 Black Bears Way Phone: (205) 469-1018

Tuscaloosa, AL 35401-4807 Fax: (205) 758-7229

Email: cburton@cspwal.com

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### U.S. Department of Energy

# WEATHERIZATION ASSISTANCE PROGRAM SUBGRANTEE INFORMATION

State: AL Grant Number: EE0009970 Program Year: 2022

**FAYETTE County** Counties CD Tentative allocation: \$ 2,648,426.00 Congressional SUMTER County AL-07 served: Planned units: 280 districts served: PICKENS County Type of organization: Local agency LAMAR County **BIBB County** GREENE County HALE County TUSCALOOSA County Source of labor: Contractors Mr. Tracy Rhodes Name: Mobile Community Action, Inc. Contact: YC9MUGJNF4Z4 UEI: 049124688 DUNS: 461 Donald St. Address: Phone: (251) 457-5700 Mobile, AL 36617-0000 (251) 457-4113 Fax: t.rhodes@mcamobile.org Email: **CHOCTAW County** Counties CD Tentative allocation: \$4,043,119.00 Congressional MOBILE County AL-01 served: districts served: Planned units: 430 WASHINGTON County Type of organization: Local agency Source of labor: Contractors Name: Montgomery County Commission, c/o Central Alabama Regional Contact: Mr. Donny Barber G7V6WJZYK5G7 UEI: DUNS: 099839086 430 S Court Street (334) 262-4300 Address: Phone: Montgomery, AL 36104-4102 (334) 262-6976 Fax: dbarber@carpdc.com Email: Counties MONTGOMERY County CD Tentative allocation: \$2,190,468.00 Congressional served: AL-02 Planned units: 247 districts served: Type of organization: Unit of local government Source of labor: Contractors Ms. Annette Shepherd Name: Organized Community Action Program, Inc. Contact: UEI: XM94E912XBN6

Email: ashepherd@troycable.net

507 North Three Notch Street

Troy, AL 36081-0908

Address:

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082060468

(334) 566-1712

(334) 566-7417

DUNS:

Phone:

Fax:

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# U.S. Department of Energy

# WEATHERIZATION ASSISTANCE PROGRAM SUBGRANTEE INFORMATION

State: AL Grant Number: EE0009970 Program Year: 2022

Counties served:	PIKE County BULLOCK County BUTLER County BARBOUR County DALE County HENRY County COFFEE County GENEVA County CRENSHAW County HOUSTON County LOWNDES County	Tentative allocation: Planned units: Type of organization:	376 Local agency	Congressional districts served:	AL-02
		Source of labor:	Contractors		

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

(Grant Number: EE0009970, State: AL, Program Year: 2022)

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

Income data for the 12 months preceding the date of application is used. The Grantee provides subgrantees 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 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 Service

Describe what household eligibility basis will be used in the Program

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

Subgrantees are required to maintain a signed weatherization program application in the client's file.

A record of previously weatherized dwelling units by address is maintained in FACSPro which is the intake system utilized by all subgrantees. If the house is eligible for reweatherization, the subgrantee 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 redetermined.

Priorities are described in Section V.5.

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

Alabama will follow the policies outlined in "Summary of Immigrant Eligibility Restrictions Under Current Law as of 2/25/2009" in the HHS Guidelines, when determining eligibility of qualified and non qualified aliens.

# **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

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

(Grant Number: EE0009970, State: AL, Program Year: 2022)

The subgrantee is required to enter all household information into FACSPro which is the intake system utilized by all subgrantees. FACSPro automatically calculates the number of priority points for the applicant. 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 increased value because of weatherization and that no undue or excessive enhancement shall occur to the value of the dwelling. FACSPro 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.

All subgrantees use a centralized intake system called FACSPro. This system is used to track completed weatherized units and will be used to insure 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. FACSPro 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 FACSPro will be required by all agencies during the performance period. The FACSPro system maintains weatherized addresses from 2002-present - individual subgrantees 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, nonstationary trailers, and storage buildings are not eligible.

Multi-family units that are 4 units or less must use the National Energy 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 Grantee 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 included in the appendices of the Programmatic Agreement. The list was compiled with the WAP Priority Measures list as guidance.

Describe how Rental Units/Multifamily Buildings will be addressed

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

(Grant Number: EE0009970, State: AL, Program Year: 2022)

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

This form allows the subgrantee 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, home improvement/beautification, etc. are not allowed with DOE funds.

Multi-family units are eligible and may be weatherized if the following criteria are met:

66% of the units must be income eligible to weatherize a multifamily unit with 5 or more units

50% must be income eligible to weatherize a multifamily dwelling of 4 units or les

#### Describe the deferral Process

Deferral may be necessary if issues cannot be adequately addressed. The decision to defer work in 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 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. Deferrals should be tracked within the FACSPro client database.

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

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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 client, or other household member, has known health conditions that prohibit the installation of insulation materials or other weatherization materials.
- 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.
- 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.
- 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.
- Moisture problems that are so severe they cannot be resolved under existing health and safety measures or as minor incidental repairs.
- 6. 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.
- The client is uncooperative, abusive, hostile, or threatening to the assessors, weatherization contractors, inspectors, or others who must work on or visit the home.
- 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
- 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.
- 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
- 11. Client cannot be reached at telephone number on file due to the service being disconnected or due to client unavailability.
- 12. Client refuses to allow assessors access to all areas of the home necessary to conduct the comprehensive weatherization assessment.
- 13. 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.
- 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.
- 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.
- 16. 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.

When a home is deferred for weatherization services, the subrecipient determines if another program 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 such as USDA and 211 Connects Alabama which is a state-wide referral service through United Way.

## 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.

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The Grantee will ensure that eligible members of tribal organizations will receive benefits equivalent to the assistance provided to other low-income persons within Alabama. The Grantee stipulates that subgrantees assure weatherization activities to include low-income Native Americans.

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

Subgrantees have service areas which the appropriate public officials designated when establishing the entities. These service areas are recognized by the Grantee 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. Any deviation from the usual procedure requires documentation be maintained in the client file.

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

The formula used to allocate funds to each county in Alabama is based on the percentage of population.

The Grantee ensures that in selecting WAP subgrantees, 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 subgrantee; and

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

The Grantee ensures that the funds received from DOE for the WAP will be allocated in accordance with DOE's selection criteria for subgrantees. These funds will be allocated to areas on the basis of the relative need for a weatherization project by low-income persons.

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 subgrantees 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

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 state-wide 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

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- 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

Applications with the highest number of points will be weatherized first. Occasionally an agency will come across a dwelling that may not rank as high on the point system as others, yet because of some unusual circumstance, such as illness, storm damage or other, the need for weatherization assistance is great. In such cases the agency may make an exception and weatherize that dwelling.

The purpose of the Priority Points System is to assist subgrantees in identifying the dwelling units most in need of weatherization assistance according to the established priorities. 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 climatic zones: 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 southernmost 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's utilizes the National Energy Audit Tool (NEAT) or the Manufactured 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.

# **Implementation of Weatherization Program Notice 154: 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 network. Hard copies are provided to subgrantees and electronic versions are emailed and available on the ADECA website at: https://adeca.alabama.gov/weatherization/

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

# **Implementation of Weatherization Program Notice 154: Section 2**

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

Sample contract language may include, but is not limited to, the following:

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All weatherization work performed with DOE funds by the subgrantee or any of its contractors must meet the guidelines 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 subgrantee 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.

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:

Approval Date: 1/21/2021

Audit Procedure: Manufactured Housing

Audit Name:

Approval Date: 1/21/2021

Audit Procedure: Multi-Family

Audit Name: Approval Date:

### Comments

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.

# **Multi-Family**

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 Recipient 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.

# V.5.3 Final Inspection

Subgrantees are required to conduct and approve a final inspection of each dwelling weatherized before the job can be reported to the Grantee as complete. Noncompliance to this program requirement is considered a serious offense and can jeopardize a subgrantee's funding.

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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 Grantee monitor(s) when a monitoring visit is conducted. At the beginning of each month, subgrantees submit BWRs of all homes completed the previous month to the Grantee for review by the monitors and/or the program manager to ensure program compliance.

Grantee staff also inspects the subgrantee's completed work during the monitoring visit onsite reviews. Weatherized homes are inspected to verify compliance with the installation standards. The Grantee will monitor/inspect at least 10% of completed units. Grantee staff selects which jobs will be monitored at random and/or during the course of a desk review which is conducted prior to each visit.

### Implementation of Weatherization Program Notice 154: Section 3

Funds are regularly available for Grantee and subgrantee staff to obtain Quality Control Inspector certification through IREC-accredited training centers. Subgrantees will have the option of obtaining the QCI certification and performing the quality control inspections at their agencies, or if subgrantee staff is unable to obtain certification, the subgrantee will be required to subcontract a Quality Control Inspection by a Quality Control Inspector.

- All units reported to DOE as completed will be inspected to insure 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 OCI.

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

There are 13 subgrantees in the State of Alabama. All Weatherization Coordinators will have the ability to attend OCI training; however, due to the prerequisites for testing, not all Weatherization Coordinators may not be able to obtain certification. For subgrantees that do not have certified staff, 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 subgrantees wishing to partner with each other to perform Quality Control Inspections.

Two Quality Control Inspector Training's have taken place in Alabama through Southface Energy Institute. Currently nine (9) individuals hold QCI certifications in the State of Alabama, all of which currently work within the WAP network. Other individuals within the WAP Network have completed the OCI Training.

Subgrantees are required to ensure that each completed unit will be inspected by a certified Quality Control Inspector. As part of the Grantees' 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 15-4. Failure to abide by the QCI process may result in questioned/unallowable cost. Multiple instances of poor QCI inspections will result in the subgrantee being placed on a Quality Improvement Plan at minimum and may result in the loss of the subgrantee'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 Specifications.

# V.6 Weatherization Analysis of Effectiveness

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The Grantee continuously evaluates the effectiveness of subgrantee operations. Subgrantees 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.

Subgrantees 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 complied for analysis and reporting purposes.

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

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Whenever there are findings during a monitoring visit, the subgrantee is required to successfully complete corrective actions as instructed by the Grantee. Future monitoring visits look closely at past issues to insure the subgrantee has understood the corrective action and continues to perform said issues correctly.

Prior to monitoring visits, the subgrantee 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 subgrantee to identify potential areas for improvement and to review specific aspects of daily activities. These assessments are provided to the Grantee during the monitoring visit and discussed with the subgrantee during the visit.

#### Effectiveness by Subgrantee

In an attempt to quantify more information regarding each individual subgrantee's effectiveness, the Grantee intends to review actual energy savings to compare subgrantees which have similar budgets and similar unit production requirements. Actual energy savings produced between similar subgrantees can be compared to identify potential opportunities for Training and Technical Assistance.

# Onsite Inspections of Weatherized and In-Progress Units

The Grantee 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 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 subgrantee to conduct programmatic and fiscal monitoring visits. These visits focus on fiscal, administrative and programmatic compliance with all applicable federal and state WAP rules and regulations. If issues are identified during monitoring visits, they must be reconciled in the subgrantee's response to the monitoring report and are reviewed during subsequent monitoring visit to ensure problems have been corrected.

### **Utility Usage Data**

The Grantee will work 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 will not exceed 20% of Total Program Operations

#### **Definitions:**

Case by Case: separate and distinct from others of the same kind, individual judgment

Case by Case issues must be submitted to the recipient for review and approval via email with an explanation of the issue, details of the specific circumstances, and the subrecipient's perspective and suggested course of action. Additional information may be requested before a determination can be made.

Major: Notable or conspicuous in effect or scope

Minor: inferior in importance, size, or degree: comparatively unimportant

These definitions are those historically used for this program. The State is currently gathering information with the intent of updating these definitions to be definitive and measurable. This update is expected completed by mid PY or start of next PY at the latest.

# V.8 Program Management

# V.8.1 Overview and Organization

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## Organization

Administration of the WAP at the local level is performed by subgrantees which include a local government and community action agencies. Information concerning these subgrantees follows on the next page.

The administration of the WAP is performed at the state level by the Energy Division of the Alabama Department of Economic and Community Affairs. The Grantee WAP Program consists of the Unit Chief, Program Manager, and Program Monitor. The Energy Division also administers the State Energy Program, LIHEAP, and CSBG.

Production information is submitted and reviewed by the Program Manager and Program Monitor. Monthly Expenditure Reports (invoices) are reviewed by the Program Monitor and Program Manager prior to being reviewed by Unit Chief. The Division Chief approves all reports before submitting them to Financial Services for processing and payment.

### V.8.2 Administrative Expenditure Limits

Administrative funding will be no more than 15% of the total allocation. The Grantee is allowed to maintain up to 7.5% of the total allocation for administrative purposes and must allocate at least 7.5% of the total allocation to subgrantees for administrative purposes.

The budget for the 5-year Bipartisan Infrastructure Law (BIL) performance period will allocate approximately 3% for the Grantee and 12% for the subgrantees.

# V.8.3 Monitoring Activities

In compliance with 10 CFR 440.12 (b) (6), the Grantee has established a 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.

A ramp-up period is anticipated between July 1, 2022 and July 1, 2023 for hiring of Grantee and subrecipients staff and training purposes. Once production begins on BIL-funded units, all subrecipients will be monitored at least once each year. Subrecipients which have weaknesses in any area necessary to ensure program and fiscal compliance may receive additional visits. Unacceptable production can result in the deobligation of a subrecipient's weatherization funds and the reallocation of those funds to another subrecipients

The Alabama Weatherization Assistance Program currently has thirteen (13) subrecipients. Once production begins on BIL-funded units, all subrecipients will be monitored as follows:

# Year 1 July 1, 2022 - June 30, 2023

Ramp-up Period: if any subrecipients begin production, the recipient will schedule monitoring visits

# Year 2 July 1, 2023 - June 30, 2024

Quarter 1 - at least 3 subrecipient

Quarter 2 - at least 3 subrecipient

Quarter 3 - at least 3 subrecipient

Quarter 4 - remaining 4 subrecipient

# Year 3 July 1, 2024 - June 30, 2025

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Quarter 1 - at least 3 subrecipient

Quarter 2 - at least 3 subrecipient

Quarter 3 - at least 3 subrecipient

Quarter 4 - remaining 4 subrecipient

# Year 4 July 1, 2025 - June 30, 2026

Quarter 1 - at least 3 subrecipient

Quarter 2 - at least 3 subrecipient

Quarter 3 - at least 3 subrecipient

Quarter 4 - remaining 4 subrecipient

### Year 5 July 1, 2026 - June 30, 2027

Quarter 1 - at least 3 subrecipient

Quarter 2 - at least 3 subrecipient

Quarter 3 - at least 3 subrecipient

Quarter 4 - remaining 4 subrecipient

Currently, the Recipient's WAP staff consists of a Program Manager and one Program Monitor. The Grantee intends to add two additional staff members to serve as Program Monitors. It is anticipated that the existing Program Monitor will obtain a Quality Control Inspector (QCI) certification in Spring 2023 and the new WAP Grantee staff will prepare to become certified as soon as possible. To assist with technical monitoring, the Grantee intends to issue a Request for Proposals for at least one OCI to secure those services until one or more Grantee staff are certified. The Program Manager and Program Monitors, in coordination with the QCI consultant, will complete the monitoring of case files and the quality review of completed work on homes.

The Recipient will conduct a programmatic and technical review of subrecipient each year. Alabama is using the independent Auditor/OCI option which requires at least 10% of all completed homes to be monitored. A minimum of 10% of the house allocation per subrecipient will be visited by the monitor(s). Pervasive errors, omissions, or dissatisfaction may be investigated with onsite reviews.

Monitoring includes the review of approximately 10 client files (if that many are available) to verify the completeness of the application, to confirm the appropriate documentation was used to determine eligibility, to verify proof of identity, to confirm the Priority Point calculations, and to confirm all required forms were collected. In addition, contractor files are reviewed to ensure they contain 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. The Grantee also reviews subrecipient agency documentation including insurance, mileage logs, time sheets, invoices, and payments to contractors.

The Recipient will endeavor to schedule monitoring visits during the normal course of subrecipient weatherization activities to ensure Work-In-Progress units are available for observation. All reasonable measures should be made to monitor sites currently being worked on. In the event a monitoring visit takes place when no units are currently being weatherized, the Monitor will note this in the Corrective Action Plan and determine how to ensure this criteria is met and Work-In-Progress is reviewed during the Corrective Action Process.

After a monitoring visit, a report is prepared and sent to the subrecipient within thirty (30) days. This report contains an overview of the monitoring and any findings along with corrective actions, if applicable. The subrecipient has thirty (30) days to respond to the Grantee 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, the Recipient prepares a letter to identify outstanding corrective actions. The subrecipient is required to respond within 15 days. If the subrecipient does not complete the required corrective actions, 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

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accordance with the General Accounting Office's "Standards for Audits or Governmental Organizations, Programs, Activities, and Function" and generally accepted auditing standards established by the American Institute of Certified Public Accountants.

Monitoring findings by the Recipient and the reviews by Independent Auditors and/or State Examiners will be reported to the subrecipient 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 subrecipient or in termination of that subrecipient's program.

Each subrecipient is required to submit monthly Production Progress Reports to the Recipient within ten (10) calendar days of the first of each month after execution of the grant agreement. This report compiles data such as the demographics of the homes weatherized for the previous month. The report also tracks homes that are in progress. The reports are reviewed and recorded to ensure that planned versus performance goals are being met. Failure to submit the report within the allotted time frame could delay the subgrantee's funding.

In addition to these monitoring efforts, each subrecipient, except local governments who are audited by the State Examiner, 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 Grantee staff as part of the risk assessment each year.

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

Training & Technical Assistance (T&TA) funds will be allocated evenly to subgrantees. Each subgrantee has been allocated a total of \$250,000.00 for T&TA during the BIL five-year performance period. While this allocation is typically utilized to pay for subgrantees' attendance at state and federal weatherization conferences, it can also be used when the Grantee is training a single agency, the subgrantee is outsourcing training needs, or for use in peer-to-peer training.

The Grantee is currently developing a Request for Proposals for a Statewide T&TA Coordinator for three major tasks: 1) prepare a training needs assessment for the WAP network to include subrecipients (financial and program management training), Retrofit Installer/Technician, Crew Leader, Energy Auditor, and Quality Control Inspector; 2) develop a customized training plan to address subgrantee training, Comprehensive Training provided by an IREC-accredited trainer, and Specific Training; and,3) implement the plan once approved by the Grantee.

Subgrantees are encouraged to explore other training opportunities. When opportunities arise the subgrantee submits a request to attend said training to be approved by the Grantee.

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

There are nine individuals in the state who have QCI certification in the WAP network. QCI training will be included in the training plan to be developed by the Statewide T&TA Coordinator and will be made available for subgrantee weatherization staff.

Subgrantees will be allowed to provide T&TA funds for contractors within the WAP. The use of T&TA funds to reimburse contractors is limited to T&TA that supports the four Home Energy Professionals occupations (Retrofit Installer/ Technician, Crew Leader, Energy Auditor, Quality Control Inspector). Reimbursement will be limited to actual registration fees, lodging, and transportation costs based on the location of the conference. 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.

### **Client Education**

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

DOE F 540.2 OMB Control No: 1910-5127 Expiration Date: 05/31/2023

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

(Grant Number: EE0009970, State: AL, Program Year: 2022)

Energy Savers - Tips on Saving Energy and Money Carbon Monoxide - Guard Against a Silent Killer The Lead-Safe Certified Guide to Renovate Right A Brief Guide to Mold, Moisture, and Your Home	
Basic Radon Facts	

Percent of overall trainings

Comprehensive Trainings: 10.0 Specific Trainings: 90.0

Breakdown of T&TA training budget

Percent of budget allocated to Auditor/QCI trainings: 40.0 Percent of budget allocated to Crew/Installer trainings: 40.0 Percent of budget allocated to Management/Financial trainings: 20.0

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

The State will not be implementing an Energy Crisis or Disaster Plan.

# Alabama Weatherization Health and Safety Plan Bipartisan Infrastructure Law (BIL)

## ☑ Policy Submitted with Plan

#### 1.0 – GENERAL INFORMATION

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

This Health and Safety Policy is part of the BIL Alabama Weatherization Assistance Program.

Effective July 1, 2022

## 2.0 - BUDGETING

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

Select which option is used below	Select which	n option	is used	below
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Separate Health and Safety Budget ☑

Contained in Program Operations □

## 3.0 — HEALTH AND SAFETY EXPENDITURE LIMITS

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

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

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

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

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

H&S Measure Matrix - Optional								
Do	uble Click To Open For	Editing						
C	ells this shade auto calc	ulate						
<u>Enter</u> Measure ↓	Enter Measure ↓ Enter Cost ↓ Enter Frequency % ↓ Auto Calculates							
CO Alarm	\$54.00	90.0%	\$48.60					
Smoke Alarm	\$75.00	50.0%	\$37.50					
ASHRAE 62.2-2016	\$900.00	60.0%	\$540.00					
Install Direct-Vent Space Heater	\$3,000.00	9.0%	\$270.00					
Repair Roof Leak	\$300.00	9.0%	\$27.00					
Clean Gas Stove	\$60.00	7.0%	\$4.20					
DWH Drip Line	\$60.00	11.0%	\$6.60					
Remove UVSH	\$70.00	11.0%	\$7.70					
Replace Dryer vent	Replace Dryer vent \$90.00 24.0%							
Correct Electrical Issue	\$15.00							
LSW	\$350.00	9.0%	\$31.50					
Repair/Upgrade Venting	\$230.00	6.0%	\$13.80					
Hazardous Material Disposal	\$6.00							
Furnace Replacement	\$180.00							
Furnace Repair/Tune								
Mold/Moisture	\$400.00	11.0%	\$44.00					
Repair Gas Leak	\$75.00	3.0%	\$2.25					
Fire Extinguisher	\$75.00	11.0%	\$8.25					
Pest Removal	\$300.00	2.0%	\$6.00					
Draininage Issues	\$200.00	2.0%	\$4.00					
Total Average H&S Cost Per Unit	\$1,295.00							
Enter Estimated Production (Annual File: IV	4000							
<b>Enter</b> Estimated Program Operations Budg	24321786							
H&S Budget (Total Average H&S Cost Per U	\$5,180,000.00							
Requested H&S Percentage Per Unit (H&S E	Budget/Program Operat	tions)	21.3%					

## 4.0 – INCIDENTAL REPAIR MEASURES

If Grantees choose to identify any H&S measures as incidental repair measures (IRMs), they must be implemented as such under the Grantee'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")

Incidental repairs are repairs that are necessary for the effective performance or preservation of weatherization materials.

Incidental repairs must be coupled with a weatherization measure – either an energy-saving measure or a health and safety measure. Therefore, such costs should be billed together with the measure for which the incidental repair is needed.

For example, when correcting knob-and-tube wiring in an attic, itself an incidental repair, the costs involved to correct the knob-and-tube wiring should be billed together with attic insulation, an energy efficient measure. Consequently, the cost of this incidental repair is to be billed to Program Operations – not Health and Safety. Conversely, when incidental repair costs are incurred in the installation of a health and safety measure; e.g., moving a gas line to install a direct vent space heater, then the cost of moving the gas line should be billed together with the installation of the direct vent space heater. Thus, the cost of moving the gas line is to be billed to Health and Safety – not Program Operations.

Roof Repair is a measure that depending on circumstances could be considered an incidental to attic insulation by protecting the attic insulation or a Health and Safety measure because it reduced the chance of mold/moisture issued in the home.

To properly classify this measure across the network the two options will be defined as follows:

In units that receive attic insulation as a weatherization measure any roof repair will be considered a measure incidental to the insulation.

In units that do not receive attic insulation roof repair will be considered a health and safety measure which reduces the chance of mold/moisture.

An incidental repair that has no direct link to a specific weatherization measure is not an allowable expenditure. Priming or painting, for instance, is not allowable if its use does not directly seal and/or protect the weatherization materials.

Costs involved with incidental repairs may not be trivial. Cases in which the cost of an incidental repair exceeds the actual cost of the weatherization measure it is coupled with may make the weatherization measure unallowable by having a SIR of less than 1.0.

Finally, when the costs of essential weatherization measures such as infiltration and insulation are compromised by the costs of their related incidental repairs, then deferring weatherization may be in order.

# 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. Grantees must be specific in their approach and provide the process for clients to be notified in writing of the deferral and what conditions must be met for weatherization to continue. Grantees must also provide a process for the client to appeal the deferral decision to a higher level in the organization.

Grantee has developed a comprehensive written deferral/referral policy that covers both H&S, and other
deferral reasons?
Yes ☑ No □

#### Weatherization Deferral Policy

Deferral may be necessary if issues cannot be adequately addressed. The decision to defer work in 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 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 <u>additional documentation</u> 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 client, or other household member, has <u>known</u> health conditions that prohibit the installation of insulation materials or other weatherization materials.
- 2. 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.
- 3. 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.
- 4. 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.
- 5. Moisture problems that are so severe they cannot be resolved under existing health and safety measures or as minor incidental repairs.
- 6. 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.
- 7. The client is uncooperative, abusive, hostile, or threatening to the assessors, weatherization contractors, inspectors, or others who must work on or visit the home.
- 8. 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.
- 9. 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.
- 10. 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 whether or not mold is found. The pamphlet found http://www.epa.gov/mold/pdfs/moldguide.pdf
- 11. Client cannot be reached at telephone number on file due to the service being disconnected or due to client unavailability.
- 12. Client refuses to allow assessors access to all areas of the home necessary to conduct the comprehensive weatherization assessment.
- 13. 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.
- 14. 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.
- 15. 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.
- 16. 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, Grantees must concur, or choose to defer all units where the specific category is encountered.
- "Allowable" items under WPN 17-06 leave room for Grantees to determine if the category, or testing, will be addressed and in what circumstances.
- Declare whether DOE funds or alternate funding source(s) will be used to address the particular category.
- Describe the explicit methods to remedy the specific category.
- Describe what testing protocols (if any) will be used.
- Define minimum thresholds that determine minor and major repairs
- Identify minimum documentation requirements for at-risk occupants
- Discuss what explicit steps will be taken to educate the client, if any, on the specific category if this is not explained elsewhere in the Plan. Some categories, like mold and moisture, require client education.
- Discuss how training and certification requirements will be provided for the specific category. Some categories, like Lead Based Paint, require training.
- Describe how occupant health and safety concerns and conditions will be solicited and documented

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

7.1 – Air Conditioning and Heating Systems				
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) $\geq$ 1.0 it must be 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 installe	d			
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 centr				
unit or several individually operating units; however, when a central unit is in place, it shall be considered	ed			
the primary unit, and all other units are to be considered secondary.				
<ul> <li>Use proper sizing protocols (Manual J, State Approved sizing protocols, NEAT/MHEA outputs, etc.) base</li> </ul>	:d			
on post-weatherization housing characteristics, including installed mechanical ventilation, when installing				
or replacing a heating or cooling appliance.				
<ul> <li>Alabama requires all HVAC system installation to follow local and state code and it must be performed</li> </ul>	by			
a licensed HVAC professional. Weatherization Subrecipients must require weatherization contractors w	ho			
are not licensed HVAC companies/individuals subcontract licensed HVAC companies/individuals to				
perform heating system installations and repairs.				
Heating Degree Days (HDD) range from 2,913 HDD in North Alabama to 1,339 HDD in South Alabama.				
Cooling Degree Days (CDD) range from 2,129 CDD in North Alabama to 3,061 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 heating systems.	iry			

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 heath or
well-being would likely be endangered as a result of extreme temperatures.
To document and individual's status as "At-Risk" and therefore eligible to receive this service he/she must supply the Agency with am <i>At-Risk Physician/Nurse Medical Statement</i> .
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 likely hood 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, Alteri	native, or Deferral		
Concurrence v	with Guidance 🗹	Alternative Gui	idance 🗆	Results in Deferral	
Take all reasonable and necessary precautions to prevent asbestos contamination in the home.					
Funding					
DOE ☑	LIHEAP 🗖	State □	Utility 🗆	Other $\square$	
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.

Major 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, Alter	native, or Deferra	
Concurrence with	n Guidance 🗹	Alternative Gu	idance $\square$	Results in Deferral
Take all reasona	ble and necessary p	recautions to pre	vent asbestos cor	ntamination in the home.
		Func	ling	
DOE ☑	LIHEAP 🗆	State □	Utility 🗆	Other 🗆
DOE funds may b	e used to address th	nis category		
How do you	u address suspected	ACM's in vermicu	lite that will be di	sturbed through the course of
		weatheriza	tion 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 al			·	
When deferral is	necessary due to as	bestos, occupant n	nust provide docu	mentation that a certified
When deferral is necessary due to asbestos, occupant must provide documentation that a certified professional performed the remediation before work continues.				
,		T		

#### **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.

<b>7.2</b> c – Asbestos - o	n pipes, furna	es, other smal	l covered surfaces	
C	oncurrence, Alter	native, or Deferral		
Concurrence with Guidance ☑	Alternative Gu	idance 🗆	Results in Deferral □	
Take all reasonable and necessary p	recautions to pre	event asbestos con	tamination in the home.	
	Fund	ding		
DOE ☑ LIHEAP □	State □	Utility 🗆	Other 🗆	
DOE funds may be used to address the				
How do you address suspected AC				
		weatherization wo	ork?	
Assume asbestos is present in suspec	t covering materia	als.		
When suspected friable ACM is prese	nt, take precautio	nary measures as i	f 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.				
Grantee may allow removal by an appropriately trained professional on a case-by-case basis.				
The grantee 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.		<i>O,</i> 1	,	
When deferral is necessary due to asbestos, occupant must provide documentation that a certified				
professional performed the remediation before work continues.				
	Testing F	Protocols		
Assess whether suspected ACMs are	present.			
AHERA sample collection and testing	is allowed and mu	ist be conducted by	a certified tester.	
	Client Fo	lucation		

When deferral is necessary, provide information in writing describing conditions that must be met in order

**Training and Certification Requirements** 

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

Instruct clients in writing not to disturb suspected ACM.

Auditors should be able to recognize suspected ACM.

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

Provide asbestos safety information to the client.

for weatherization to commence.

7.5 – Biologicals and Unsanitary Conditions					
(odors, mustiness,	(odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.)				
	Concurrence, Alternativ	e, or Deferral			
Concurrence with Guidance   ✓	Alternative Guidan	ce 🗆	Results in Deferral		
	Unallowable Mea	sure $\square$			
	Funding				
DOE ☑ LIHEAP □	State □	Utility 🗆	Other $\square$		
DOE funds may be used to address					
What guidance do you provide S	•	_	al and/or unsanitary conditions in		
	homes slated for wear				
Remediation of conditions that ma	y lead to or promote biol	ogical concerr	s and unsanitary conditions is		
allowed.					
Addressing bacteria and viruses is	not an allowable cost.				
Deferral may be necessary in cases	s where conditions in the	home pose a l	nealth risk to occupants and/or		
weatherization workers.	weatherization workers.				
See Mold and Moisture section for more information.					
Testing Protocols					
Sensory inspection					
	Client Educat	ion			
Inform client in writing of observed					
Provide information on how to ma	intain 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 condition	ns and when to defer.				
Safe work practices when encount	ering such conditions.				

7.6 – Building Structure and Roofing			
Concurrence, Alternative, or Deferral			
Concurrence with Guidance ☑ Alternative Guidance □ Results in Deferral □			
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 ☑ LIHEAP □ State □ Utility □ Other □			
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. Beyond simple incidental repairs, such as roof patching, there is no feasible means to			
address severe structural defects.			
Roof repairs are allowable as a H&S measure if:			
It resolves and bulk water intrusion issue that is the cause of visible biological growth and;			
The H&S roof 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 cost of the incidental repair must be included in the cost of the measure in which it is associated.			
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 ✓ 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 code compliance issues in homes re	ceiving			
weatherization measures?				
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.				
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				

they addressed?

What specific situations commonly trigger code compliance work requirements for your network? How are

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

in the client file.

under this guidance must be deferred.

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.

#### **Client Education**

Inform client in writing of observed code compliance issues when it results in a deferral.

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

#### **Training**

Assessors should determine what code compliance may be required.

Subrecipients must be aware of code compliance.

Subrecipients must ensure that weatherization-related work complies with all applicable codes.

# 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 Grantee 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).

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 – Ele	ectrical			
		Concurrence, Alterr	native, or Deferra	l		
Concurrence with G	Concurrence with Guidance ☑ Alternative Guidance □ Results in Deferral □					
	Funding					
DOE ☑	LIHEAP 🗆	State □ Utility □ Other □		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 considered an incidental repair and 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 cost of the incidental repair must be included in the cost of the measure in which it is associated. 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 sitespecific 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 ☑ Alternative Guidance □ Results in Deferral □					
Funding					
DOE ☑ LIHEAP □ State □ Utility □ Other □		□ Other □			
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 Hazardous Materials Disposal 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 ☑ Alternative Guidance □ Results in Deferral □					
	Fund	ding			
DOE ☑ LIHEAP □	] State □	Utility 🗆	Other $\square$		
DOE funds may be used to add					
	Remediatio				
When a minor gas leak is foun work may proceed.	d on the utility side of sei	rvice, the utility ser	vice must be contacted bef	ore	
Fuel leaks that are the respon	sibility of the client (vs. th	ne utility) must be r	epaired before weatherizin	g a unit.	
Notify utilities and temporarily address.	y halt work when leaks ar	e discovered that a	re the responsibility of the	utility to	
Test exposed gas lines for fuel	leaks from utility couplin	g into, and through	nout, the home.		
Conduct sensory inspection or	n bulk fuels to determine	if leaks exist.			
How do you define allowable	e fuel leak repairs, and at of weathe	•	pairs considered beyond th	ie scope	
Fuel leak repairs are allowable when the leak is not severe enough to pose a hazard to the worker or					
occupant. A leak would be cor	nsidered beyond the scop	e of weatherization	n if it is severe enough to po	ose a	
hazard to the worker or occupant.					
	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	☑ Alternative Gu	idance $\square$	Results in Deferral		
	Fund				
DOE 🗹 LIHEAP 🗆		Utility 🗆	Other		
DOE funds may be used to add					
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 Alternative Guidance Results in Deferral			
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 ☑ LIHEAP □ State □ Utility □ Other □			
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.			
Appropriate Personal Protective Equipment (PPE) for working with hazardous waste materials.			
Appropriate Personal Protective Equipment (PPE) for working with hazardous waste materials.  Disposal requirements and locations.			
Appropriate Personal Protective Equipment (PPE) for working with hazardous waste materials.  Disposal requirements and locations.  Health and environmental risks related to hazardous materials.			
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			
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			
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.			
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			
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			
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)			
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			
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 Alternative Guidance Results in Deferral			
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 Alternative Guidance Results in Deferral  Funding			
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 Alternative Guidance Results in Deferral  Funding			

(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. Minor 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 ☑ LIF	HEAP 🗆	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):

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

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

- i. Window replacement.
- ii. Demolition of painted surface areas.
- iii. Using any of the following:
- Open-flame burning or torching;
- Machines to remove paint through high-speed operation without HEPA exhaust control; or
- 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.

Grantees 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.

Grantee 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, Alteri			
Concurrence v	vith Guidance 🗹	Alternative Gui		Results in Deferral	
		Fund	<del>-</del>		
DOE ☑	LIHEAP 🗆	State $\square$	Utility 🗆	Other 🗆	
	y be used to address t				
_		•	_	ure related issues (e.g., drainage,	
gutters, down	ı spouts, moisture baı			n bare earth floors) in homes slate	d
		for weather			
	• .	•		vorkers are allowed when necessary	У
		_	•	d durability of the measures.	
	· ·			is allowed when necessary in order	
		_	ability and durabi	lity of the measures. Source control	ı
	t of latent damage and				
	Mold and Moisture is			required.	
Extensive mole	d removal/cleanup is i	not an allowable H&	S cost.		
				e.g., cleaning mold off window trim	1
	oly caulk) must be cha	•			
	nent including exterior	_	_		
Diagnostics su	ch as moisture meters	s are recommended	pre-weatherization	on and at the final inspection.	
How do you d	lefine "minor" or allo	wable moisture-rela	ated measures, a	nd at what point is work considere	d
		beyond the scope of			
		•	e the repair of sm	all plumbing leaks and or structural	l
	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				ıp
•	itside may be address				
-	Issues beyond these parameters may result in the deferral of the unit until the issues can be addressed by				
either the non	neowner or other fund				
Dravida diant	written notification a	Client Ed		www.ronocc	
	nation on importance	_			
	• •		•	e drainage and moisture control.	
		information in writ	ing describing cor	nditions that must be met in order	
for weatheriza	tion to commence.				_
		Train			
	uld be able to identify	potential or existing	g mold and/or mo	isture issues.	
How to recogn	nize drainage issues.				
		7.17 –	Pests		
		Concurrence, Alteri	native, or Deferra	I	
Concurrence v	vith Guidance 🗹	Alternative Gui	idance 🗆	Results in Deferral	
		Fund	ling		
DOE ☑	LIHEAP 🗆	State □	Utility 🗆	Other 🗆	_
DOE funds ma	y be used to address t	this category			
What guidanc	e do you provide Sub	recipients for dealing	ng with pests and	pest intrusion prevention in home	25
		slated for wea	therization?		

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 v	Concurrence with Guidance ☑ Alternative Guidance □ Results in Deferral □				
		Fundiı	ng		
DOE ☑	LIHEAP 🗆	State □ Utility □ Other □			
DOE funds ma	y be used to address tl	nis category			
	What guidar	nce do you provide S	ubrecipients are	ound radon?	
Required:					
Cover exposed	d dirt floors within the	pressure/thermal bo	undary with a se	ealed soil gas retarder	
Cover sump w	ell/pits with airtight co	vers			
Implement ve	ntilation as required by	/ ASHRAE 62.2-2016			
Allowable:	Allowable:				
In homes where radon may be present, work scope should include precautionary measures based on EPA Healthy Indoor Environment Protocols for Home Energy Upgrades, to reduce the possibility of making radon issues worse. 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.					
Radon miligal	ion is not an allowable	nas cost.			
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:

Information from the results of the IAQ Study that there is a small risk of increasing radon levels when building tightness is improved;

A list of precautionary measures WAP will install based on EPA Healthy Indoor Environment Protocols; Some of the benefits of Weatherization including energy savings, energy cost savings, improved home comfort, and increased safety; and confirmation that EPA's A Citizen's Guide to Radon was received and radon related risks discussed with the client.

#### **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 wi	th Guidance 🗹	Alternative Gu	iidance 🗆	Results in Deferral	
		Fun	ding		
DOE 🗹	LIHEAP 🗆	State □	Utility 🛘	Other 🗆	
DOE funds may	be used to address t	his category			
	What is your po	licy for installation	n or replacement o	of the following:	
Smoke Alarms:					
Should be insta	lled on each floor out	tside sleeping area	s if operable alarm	s are not present.	
Should be insta	lled according to the	manufacturer's ins	structions.		
Carbon Monoxi					
	ed in every home if o				
Should be insta	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	Verify operation of installed alarms.				
		Client Ed	ducation		
Provide client w	ith verbal and writte	n information on ι	ise of devices insta	lled.	
Training					
Auditors are tra	ined on where to ins	tall alarms.			
Auditors should	Auditors should be aware of local (or AHJ) code compliance.				
7.20 – Occupant Health and Safety Concerns and Conditions					
Concurrence, Alternative, or Deferral					
Concurrence wi	th Guidance ☑	Alternative Gu	uidance 🗆	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 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 ☑ No □			
Decamendation Form(b) have been developed and comply than galaxineer. Fee = 110 =			
7.21 - Ventilation and Indoor Air Quality			
Concurrence, Alternative, or Deferral  Concurrence with Guidance ✓ Alternative Guidance □ Results in Deferral □			
Concurrence with Guidance ✓ Alternative Guidance □ Results in Deferral □			
For dia a			
Funding			
DOE ☑ LIHEAP □ State □ Utility □ Other □			
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.			
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

**Training** 

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

quality.

Subrecipients are instructed to use the Residential Energy Dynamics (RED) ASHRAE 62.2-2016 calculator located at <a href="https://www.residentialenergydynamics.com">www.residentialenergydynamics.com</a>

7.22 – Window and Door Repair and Replacement, Window Guards								
Concurrence, Alternative, or Deferral								
Concurrence	Concurrence with Guidance ☑ Alternative Guidance □		idance 🗆	Results in Deferral □				
Funding								
DOE ☑	LIHEAP 🗖	State □	Utility 🗆	Other 🗆				
DOE funds may be used to address this category								
What guida	What guidance do you provide to Subrecipients regarding window and door repair and replacement and							
window guards?								
Repair using H	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 ands 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?								
The incidental repair must be included in the cost of the measure in which it is associated.								
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 🗹	Alternative Guidance		Results in Deferral				
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 ☑ LIHEAP □	State □	Utility 🗆	Other $\square$				
DOE funds may be used to address this category							
How do you verify safe work practices? What is your policy for in-progress monitoring?							
Grantees 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.							