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

August 18, 2022

DRAFT
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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 administering 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 ..........................................................$6,455.45
Health and Safety average expenditure per home ...............................$1,295.00

- Average Cost Per Unit is capped at $8,009
- Quality Control Inspector final inspection is required
- Training and Technical assistance funds are available to obtain certification and receive required CEU’s
- Total administrative limit is 15%
APPLICATION FOR FEDERAL ASSISTANCE SF-424

1. Type of Submission:  
   - Preapplication  
   - [X] Application  
   - Changed/Corrected Application

2. Type of Application:  
   - [X] Revision

If Revision, select appropriate letter(s)
   - [ ] New
   - [ ] Continuation
   - [X] Increase Award
   - [ ] Other (specify):

3. Date Received:  
   03/10/2022

4. Applicant Identifier:

5a. Fed Entity Identifier:  
5b. Federal Award Identifier:  
   DE-EE0009970 (SF-424 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. UER:  
   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:  
     AL Dept of Economic and Community Affairs (ADECA)
   - Division Name:  
     Energy

f. Name and contact information of person to be contacted on matters involving this application:
   - Prefix:  
     Ms
   - First Name:  
     Jennifer
   - Middle Name:
   - Last Name:  
     Lee
   - Suffix:
   - Title:  
     Energy Division Chief
   - Organizational Affiliation:  
     ADECA
   - Telephone Number:  
     3343533005
   - Fax Number:
   - Email:  
     jennifer.lee@adeca.alabama.gov
APPLICATION FOR FEDERAL ASSISTANCE SF-424

<table>
<thead>
<tr>
<th>9. Type of Applicant:</th>
<th>State Government</th>
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<th>11. Catalog of Federal Domestic Assistance Number:</th>
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<td>Weatherization Assistance Program: Bipartisan Infrastructure Law</td>
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<td>Title:</td>
<td>2022 WAP Bipartisan Infrastructure Law</td>
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<td>Title:</td>
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<th>14. Areas Affected by Project (Cities, Counties, States, etc.):</th>
<th>Alabama - Statewide</th>
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<th>15. Descriptive Title of Applicant's Project:</th>
<th>Weatherization Assistance Program For Low-Income Persons</th>
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APPLICATION FOR FEDERAL ASSISTANCE SF-424

16. Congressional District Of:
   a. Applicant: Alabama Congressional District 02
   b. Program/Project: AL-Statewide

   Attach an additional list of Program/Project Congressional Districts if needed:

17. Proposed Project:
   a. Start Date: 07/01/2022
   b. End Date: 06/30/2027

18. Estimated Funding ($):
   a. Federal  47,489,502.00
   b. Applicant  0.00
   c. State  0.00
   d. Local  0.00
   e. Other  0.00
   f. Program Income  0.00
   g. TOTAL  47,489,502.00

19. Is Application subject to Review By State Under Executive Order 12372 Process?:
   □ a. This application was made available to the State under the Executive Order 12372 Process for review
   X b. Program is subject to E.O. 12372 but has not been selected by the State for review.
   □ c. Program is not covered by E.O. 12372

20. Is the applicant Delinquent On Any Federal Debt? (If "Yes", provide explanation)
   No

21. By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the
    statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to
    □ I AGREE

    ** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or
     agency

Authorized Representative:

Prefix: Mr
Middle Name: W.
Last Name: Boswell
Suffix:
Title: Director
Telephone Number: 3342425591
Fax Number:
Email: Kenneth.Boswell@adea.alabama.gov

Signature of Authorized Representative:  Signed Electronically  Date Signed:

Authorized for Local Reproduction

Standard Form 424 (Revised 10/2005)
Prescribed by OMB Circular A-102
**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  
   401 Adams Avenue - Suite 560  
   Montgomery, AL 361035690

4. Program/Project Start Date  
   07/01/2022

5. Completion Date  
   06/30/2027

### SECTION A - BUDGET SUMMARY

<table>
<thead>
<tr>
<th>Grant Program Function or Activity (a)</th>
<th>Federal Catalog No. (b)</th>
<th>Estimated Unobligated Funds</th>
<th>New or Revised Budget</th>
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<tbody>
<tr>
<td></td>
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<td>Federal (c)</td>
<td>Non-Federal (d)</td>
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<td>3.</td>
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<tr>
<td>4.</td>
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<tr>
<td>5. TOTAL</td>
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### SECTION B - BUDGET CATEGORIES

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<thead>
<tr>
<th>6. Object Class Categories</th>
<th>(1) GRANTEE ADMINISTRATION</th>
<th>(2) SUBGRANTEE ADMINISTRATION</th>
<th>(3) GRANTEE T&amp;TA</th>
<th>(4) SUBGRANTEE T&amp;TA</th>
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<tr>
<td>h. Other Direct Costs</td>
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</table>
# BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No.  
EE0009570

2. Program/Project Title  
Weatherization Assistance Program Bipartisan Infrastructure Law

3. Name and Address  
State of Alabama  
401 Adams Avenue - Suite 560  
Montgomery, AL 361035690

4. Program/Project Start Date  
07/01/2022

5. Completion Date  
06/30/2027

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<thead>
<tr>
<th>Grant Program Function or Activity (a)</th>
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## SECTION B - BUDGET CATEGORIES

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<th>6. Object Class Categories</th>
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</tr>
<tr>
<td>c. Travel</td>
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<td>$ 0.00</td>
</tr>
<tr>
<td>d. Equipment:</td>
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<tr>
<td>e. Supplies</td>
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<tr>
<td>f. Contract</td>
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<td>g. Construction</td>
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<tr>
<td>h. Other Direct Costs</td>
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<td>i. Total Direct Charges</td>
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<td>j. Indirect Costs</td>
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<td>5. TOTAL</td>
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### SECTION B - BUDGET CATEGORIES

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<td>7. Program Income</td>
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<td>$ 0.00</td>
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</table>
## U.S. DEPARTMENT OF ENERGY

### BUDGET JUSTIFICATION FOR FORMULA GRANTS

Applicant: State of Alabama  
Award number: EE0009970  
Budget period: 07/01/2022 - 06/30/2027

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

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

<table>
<thead>
<tr>
<th>Position</th>
<th>Description of Duties of Professionals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Program Monitor - Planning &amp; Economic Development Specialist (PEDS) I</td>
<td>Program Monitor is responsible for monitoring all Alabama subgrantees at least once each year, compiles field review reports and monthly subgrantee production reports, provides on-site T&amp;TA where applicable, and serves as program counselor to subgrantee staff. The balance of salary and benefits is paid by other, non-weatherization programs such as LIHEAP. Year 1 Salary: $33,744.00 Year 2 Salary: $33,744.00 Year 3 Salary: $35,457.60 Year 4 Salary: $37,221.60 Year 5 Salary: $41,092.80 Total Salary for 5-year BIL period: $181,260</td>
</tr>
<tr>
<td>Program Monitor - Planning &amp; Economic Development Specialist (PEDS) I</td>
<td>Program Monitor is responsible for monitoring all Alabama subgrantees at least once each year, compiles field review reports and monthly subgrantee production reports, provides on-site T&amp;TA where applicable, and serves as program counselor to subgrantee staff. The balance of salary and benefits is paid by other, non-weatherization programs such as LIHEAP. Year 1 Salary: $33,744.00 Year 2 Salary: $33,744.00 Year 3 Salary: $35,457.60 Year 4 Salary: $37,221.60 Year 5 Salary: $41,092.80 Total Salary for 5-year BIL period: $181,260</td>
</tr>
<tr>
<td>Program Monitor - Planning &amp; Economic Development Specialist (PEDS) I</td>
<td>Program Monitor is responsible for monitoring all Alabama subgrantees at least once each year, compiles field review reports and monthly subgrantee production reports, provides on-site T&amp;TA where applicable, and serves as program counselor to subgrantee staff. The balance of salary and benefits is paid by other, non-weatherization programs such as LIHEAP. Year 1 Salary: $47,596.80 Year 2 Salary: $49,953.60 Year 3 Salary: $52,428.00 Year 4 Salary: $52,428.00 Year 5 Salary: $55,056.00 Total Salary for 5-year BIL period: $257,462.40</td>
</tr>
<tr>
<td>Program Manager - Planning &amp; Economic Development Specialist (PEDS) III</td>
<td>Program Manager is responsible for preparing correspondence, reports, and program information to subgrantees, develops and organizes workshops and trainings for subgrantees, develops state plans and public hearings develops subgrantee budgets, resolves corrective issues from subgrantees and performs other duties as required in managing the program. The balance of salary and benefits is paid by other, non-weatherization programs such as LIHEAP. Year 1 Salary: $33,224.80 Year 2 Salary: $36,436.00 Year 3 Salary: $39,289.60 Year 4 Salary: $42,246.40 Year 5 Salary: $46,359.20 Total Salary for 5-year BIL period: $296,556.00</td>
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<tr>
<td>Community Programs Unit Chief - Planning &amp; Economic Development Specialist (PEDS) IV</td>
<td>Community Programs Unit Chief supervises the LIHEAP, CSBG, and Weatherization Programs. The balance of salary and benefits is paid by other, non-weatherization programs such as LIHEAP and CSBG. Year 1 Salary: $75,964.80 Year 2 Salary: $74,472.00 Year 3 Salary: $78,247.20 Year 4 Salary: $80,210.40 Year 5 Salary: $84,350.40 Total Salary for 5-year BIL period: $393,244.80</td>
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08/18/2022  
Page 1 of 5
Direct Personnel Compensation:

<table>
<thead>
<tr>
<th>Position</th>
<th>Salary/Rate</th>
<th>Time</th>
<th>Direct Pay</th>
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<td>$181,260.00</td>
<td>40.000 % FT</td>
<td>$72,504.00</td>
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<tr>
<td>Program Monitor - Planning &amp; Economic Development Specialist (PEDS) I</td>
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<td>40.000 % FT</td>
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Direct Pay Total $425,602.08

2. FRINGE BENEFITS

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

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

FICA: April 2021 through March 2022 = 7.65%
Retirement: Current Employees 14.82%/New Hires (after 1/1/2013) 14.44%
Health Insurance:$930.00/Month = $11,160.00/year
Community Programs Unit Chief (PEDS IV): $11,160*5 years (15%) = $8,370.00/$58,986.72 = 14.1896%
Program Manager (PEDS III): $11,160*5 (40%) = $22,320.00/$118,622.40 = 18.8160%
Program Monitor (PEDS I): $11,160*5 (40%) = $22,320.00/$102,984.96 = 21.6731%
Program Monitor (PEDS I): $11,160*5 (40%) = $22,320.00/$72,504.00 = 30.8745%
Program Monitor (PEDS I): $11,160*5 (40%) = $22,320.00/$72,504.00 = 30.8745%
Average Fringe Rate is 45.59%

Fringe Benefits Calculations

<table>
<thead>
<tr>
<th>Position</th>
<th>Direct Pay</th>
<th>Rate</th>
<th>Benefits</th>
</tr>
</thead>
<tbody>
<tr>
<td>Program Monitor - Planning &amp; Economic Development Specialist (PEDS) I</td>
<td>$72,504.00</td>
<td>52.9000 %</td>
<td>$38,354.62</td>
</tr>
<tr>
<td>Program Monitor - Planning &amp; Economic Development Specialist (PEDS) I</td>
<td>$72,504.00</td>
<td>52.9000 %</td>
<td>$38,354.62</td>
</tr>
<tr>
<td>Program Monitor - Planning &amp; Economic Development Specialist (PEDS) I</td>
<td>$102,984.96</td>
<td>43.9000 %</td>
<td>$45,210.40</td>
</tr>
<tr>
<td>Program Manager - Planning &amp; Economic Development Specialist (PEDS) III</td>
<td>$118,622.40</td>
<td>41.6000 %</td>
<td>$49,346.92</td>
</tr>
<tr>
<td>Community Programs Unit Chief - Planning &amp; Economic Development Specialist (PEDS) IV</td>
<td>$58,986.72</td>
<td>36.6610 %</td>
<td>$21,625.12</td>
</tr>
</tbody>
</table>

Fringe Benefits Total $192,891.68

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.
### Purpose of Trip

<table>
<thead>
<tr>
<th></th>
<th>Number of Trips</th>
<th>Cost Per Trip</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fuel Charges</td>
<td>150</td>
<td>$61.00</td>
<td>$9,150.00</td>
</tr>
<tr>
<td>Monitoring and T&amp;TA visits to subgrantees (Nearby day trips, no per-diem)</td>
<td>15</td>
<td>$0.00</td>
<td>$0.00</td>
</tr>
<tr>
<td>Monitoring and T&amp;TA visits to subgrantees (Distant day trips)</td>
<td>55</td>
<td>$45.00</td>
<td>$2,475.00</td>
</tr>
<tr>
<td>Monitoring and T&amp;TA visits to subgrantees (Overnight Trips last 3 days)</td>
<td>100</td>
<td>$400.00</td>
<td>$40,000.00</td>
</tr>
<tr>
<td>Out of State Travel (Conference, Training, etc.)</td>
<td>30</td>
<td>$3,200.00</td>
<td>$96,000.00</td>
</tr>
<tr>
<td><strong>Travel Total</strong></td>
<td></td>
<td></td>
<td>$147,625.00</td>
</tr>
</tbody>
</table>

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 costs are based on historical costs and comply with all State of Alabama travel and reimbursement policies. Out of State conferences may include, but are not limited, to National Association of State Community Services Programs (NASCSP), Energy Out West, and Home Performance Coalition Conferences. Monitoring and T&TA visits to subgrantees (Nearby day trips, no per-diem) Alabama does not allow per-diem for travel of less that 25 miles.

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

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

<table>
<thead>
<tr>
<th>Equipment</th>
<th>Unit Cost</th>
<th>Number</th>
<th>Total Cost</th>
<th>Justification of Need</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle Purchase</td>
<td>$50,000.00</td>
<td>2</td>
<td>$100,000.00</td>
<td>Vehicles for monitoring purposes. 100% dedicated to DOE</td>
</tr>
</tbody>
</table>

   Equipment Total $100,000.00

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

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

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

<table>
<thead>
<tr>
<th>General Category</th>
<th>Cost</th>
<th>Justification of Need</th>
</tr>
</thead>
<tbody>
<tr>
<td>Various tools and supplies</td>
<td>$5,000.00</td>
<td>Various small tools and supplies for the Grantee to conduct monitoring activities and for Subgrantees to perform energy audits, inspections, etc.</td>
</tr>
<tr>
<td>Materials for Training Events</td>
<td>$2,500.00</td>
<td>Materials such as binders, folders, markers, boards, etc. for training purposes.</td>
</tr>
<tr>
<td>Calibration of Testing Equipment</td>
<td>$2,500.00</td>
<td>Calibration of testing equipment to ensure accurate readings</td>
</tr>
</tbody>
</table>

   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 are estimated based on prior billing and researched prices

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

<table>
<thead>
<tr>
<th>Name of Proposed Sub</th>
<th>Total Cost</th>
<th>Basis of Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alabama Council on Human Relations, Inc.</td>
<td>$1,674,495.00</td>
<td>Weatherization</td>
</tr>
<tr>
<td>Community Action Agency of Talladega, Clay, Randolph, Calhoun, and Cleburne Counties</td>
<td>$2,080,501.00</td>
<td>Weatherization</td>
</tr>
<tr>
<td>Montgomery County Commission C/O CARPDC</td>
<td>$2,320,132.00</td>
<td>Weatherization</td>
</tr>
<tr>
<td>Community Service Programs of West Alabama, Inc.</td>
<td>$2,718,738.00</td>
<td>Weatherization</td>
</tr>
<tr>
<td>Contract Consultant - Statewide T&amp;TA Coordinator</td>
<td>$1,000,000.00</td>
<td>Selection will be procured through Request for Proposals process during second quarter of 2022 program year for a consultant to prepare a training needs assessment, develop a customized training plan, and implement the approved plan.</td>
</tr>
<tr>
<td>Contract Consultant - Quality Control Inspector (QCI)</td>
<td>$1,000,000.00</td>
<td>Selection will be procured through Request for Proposals process during second quarter of 2022 program year.</td>
</tr>
<tr>
<td>Community Action Agency of South Alabama, Inc.</td>
<td>$2,452,635.00</td>
<td>Weatherization</td>
</tr>
<tr>
<td>Community Action Partnership of North Alabama, Inc.</td>
<td>$2,796,477.00</td>
<td>Weatherization</td>
</tr>
<tr>
<td>Organized Community Action Program, Inc.</td>
<td>$3,576,286.00</td>
<td>Weatherization</td>
</tr>
<tr>
<td>Community Action Partnership Huntsville/Madison and Limestone Counties, Inc.</td>
<td>$2,699,810.00</td>
<td>Weatherization</td>
</tr>
<tr>
<td>Subgrantee Vehicle Purchases</td>
<td>$1,500,000.00</td>
<td>Amount budgeted for subgrantees to purchase vehicles</td>
</tr>
<tr>
<td>Community Action Agency of Northwest Alabama, Inc.</td>
<td>$1,537,455.00</td>
<td>Weatherization</td>
</tr>
<tr>
<td>Central Alabama Regional Planning and Development Commission (CARPDC)</td>
<td>$3,336,898.00</td>
<td>Weatherization</td>
</tr>
<tr>
<td>Community Action Committee of Chambers-Tallapoosa-Coosa</td>
<td>$901,205.00</td>
<td>Weatherization</td>
</tr>
<tr>
<td>Mobile Community Action, Inc.</td>
<td>$4,029,140.00</td>
<td>Weatherization</td>
</tr>
<tr>
<td>Community Action Agency of Northeast Alabama, Inc.</td>
<td>$8,247,971.00</td>
<td>Weatherization</td>
</tr>
<tr>
<td>State Weatherization Training</td>
<td>$2,536,811.00</td>
<td>State Weatherization Training</td>
</tr>
<tr>
<td>Contracts and Subgrants Total</td>
<td>$44,408,554.00</td>
<td></td>
</tr>
</tbody>
</table>

*For example, Competitive, Historical, Quote, Catalog

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

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

<table>
<thead>
<tr>
<th>General Description</th>
<th>Cost</th>
<th>Justification of Need</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pollution Occurrence Insurance</td>
<td>$710,000.00</td>
<td>To assure Grantee and subgrantees from liability claims related to pollution occurrence incidents.</td>
</tr>
</tbody>
</table>

Other Direct Costs Total $710,000.00
b. Please provide a basis of cost for each item listed above. Examples include vendor quotes, prior purchases of similar or like items, published price list, etc.

$710,000.00 has been budgeted for Pollution Occurrence Insurance which will be purchased statewide and cover all subgrantees. The estimate is based on previous years’ costs. 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 only being used in support of the Weatherization Assistance 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: 205-934-104

<table>
<thead>
<tr>
<th>Indirect Cost Account</th>
<th>Direct Total</th>
<th>Indirect Rate</th>
<th>Total Indirect</th>
</tr>
</thead>
<tbody>
<tr>
<td>Provisional - ADECA-ED (Energy Division) 10/1/21-9/30/22</td>
<td>$45,994,675.00</td>
<td>3.2500 %</td>
<td>$1,494,826.94</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Indirect Costs Total $1,494,826.94</td>
</tr>
</tbody>
</table>
# IV.1 Subgrantees

<table>
<thead>
<tr>
<th>Subgrantee (City)</th>
<th>Planned Funds/Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alabama Council on Human Relations, Inc. (Auburn)</td>
<td>$1,674,495.00</td>
</tr>
<tr>
<td>Central Alabama Regional Planning and Development Commission (CARPDC) (Montgomery)</td>
<td>$3,336,898.00</td>
</tr>
<tr>
<td>Community Action Agency of Northeast Alabama, Inc (Rainville)</td>
<td>$8,247,971.00</td>
</tr>
<tr>
<td>Community Action Agency of Northwest Alabama, Inc. (Florence)</td>
<td>$1,537,455.00</td>
</tr>
<tr>
<td>Community Action Agency of South Alabama, Inc. (Daphne)</td>
<td>$2,452,635.00</td>
</tr>
<tr>
<td>Community Action Agency of Talladega, Clay, Randolph, Calhoun and Cleburne Counties (Talladega)</td>
<td>$2,080,501.00</td>
</tr>
<tr>
<td>Community Action Committee, Inc. of Chambers-Tallapoosa-Coosa (Dadeville)</td>
<td>$901,205.00</td>
</tr>
<tr>
<td>Community Action Partnership of Huntsville/ Madison and Limestone Counties, Inc. (Huntsville)</td>
<td>$2,699,810.00</td>
</tr>
<tr>
<td>Community Action Partnership of North Alabama, Inc. (Decatur)</td>
<td>$2,796,477.00</td>
</tr>
<tr>
<td>Community Service Programs of West Alabama, Inc (Tuscaloosa)</td>
<td>$2,718,738.00</td>
</tr>
<tr>
<td>Mobile Community Action, Inc. (Mobile)</td>
<td>$4,029,140.00</td>
</tr>
<tr>
<td>Montgomery County Commission, c/o Central Alabama Regional Planning and Development Commission (Montgomery)</td>
<td>$2,320,132.00</td>
</tr>
<tr>
<td>Organized Community Action Program, Inc. (Troy)</td>
<td>$3,576,286.00</td>
</tr>
<tr>
<td><strong>Total:</strong></td>
<td>$38,371,743.00</td>
</tr>
</tbody>
</table>

## IV.2 WAP Production Schedule

<table>
<thead>
<tr>
<th>Weatherization Plan</th>
<th>Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Units (excluding reweathered)</td>
<td>4,000</td>
</tr>
<tr>
<td>Rewetherized Units</td>
<td>0</td>
</tr>
</tbody>
</table>

Average Unit Costs, Units subject to DOE Project Rules

**VEHICLE & EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)**

<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Total Vehicles &amp; Equipment ($5,000 or more) Budget</td>
<td>$1,500,000.00</td>
</tr>
<tr>
<td>B</td>
<td>Total Units Weatherized</td>
<td>4,000</td>
</tr>
<tr>
<td>C</td>
<td>Total Units Rewetherized</td>
<td>0</td>
</tr>
<tr>
<td>D</td>
<td>Total Dwelling Units to be Weatherized and Rewetherized (B + C)</td>
<td>4,000</td>
</tr>
<tr>
<td>E</td>
<td>Average Vehicles &amp; Equipment Acquisition Cost per Unit (A divided by D)</td>
<td>$375.00</td>
</tr>
</tbody>
</table>

**AVERAGE COST PER DWELLING UNIT (DOE RULES)**

<p>| | | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>F</td>
<td>Total Funds for Program Operations</td>
<td>$24,321,786.00</td>
</tr>
<tr>
<td>G</td>
<td>Total Dwelling Units to be Weatherized and Rewetherized (from line D)</td>
<td>4,000</td>
</tr>
</tbody>
</table>
U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
WEATHERIZATION ANNUAL FILE WORKSHEET

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

<table>
<thead>
<tr>
<th></th>
<th>Average Program Operations Costs per Unit (F divided by G)</th>
<th>$6,080.45</th>
</tr>
</thead>
<tbody>
<tr>
<td>I</td>
<td>Average Vehicles &amp; Equipment Acquisition Cost per Unit (from line E)</td>
<td>$375.00</td>
</tr>
<tr>
<td>J</td>
<td>Total Average Cost per Dwelling (H plus I)</td>
<td>$6,455.45</td>
</tr>
</tbody>
</table>

IV.3 Energy Savings

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

<table>
<thead>
<tr>
<th>Units</th>
<th>Savings Calculator (MBtu/s)</th>
<th>Energy Savings</th>
</tr>
</thead>
<tbody>
<tr>
<td>This Year Estimate 4000</td>
<td>29.3</td>
<td>117200</td>
</tr>
<tr>
<td>Prior Year Estimate 425</td>
<td>29.3</td>
<td>12452</td>
</tr>
<tr>
<td>Prior Year Actual 546</td>
<td>29.3</td>
<td>15998</td>
</tr>
</tbody>
</table>

Method used to calculate savings description:

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)(x), 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 commission serves in this category and add name below

<table>
<thead>
<tr>
<th>Name</th>
<th>Type of organization: Non-profit (not a financial institution)</th>
<th>Contact Name:</th>
<th>Phone:</th>
<th>Email:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mr. Antwon Prince-Scaley</td>
<td></td>
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</tr>
<tr>
<td></td>
<td>Type of organization: Non-profit (not a financial institution)</td>
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<td></td>
<td>Contact Name:</td>
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<td></td>
<td>Email:</td>
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<tr>
<td>Mr. Donny Barber</td>
<td></td>
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<tr>
<td></td>
<td>Type of organization: Non-profit (not a financial institution)</td>
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<td>Email:</td>
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<tr>
<td>Mr. Kris Rowe</td>
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<td></td>
<td>Type of organization: Non-profit (not a financial institution)</td>
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<td>Contact Name:</td>
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<td>Email:</td>
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<tr>
<td>Mr. Luke Laney</td>
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<td>Type of organization: Non-profit (not a financial institution)</td>
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<td>Contact Name:</td>
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<td>Email:</td>
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<tr>
<td>Ms. Delores Massin</td>
<td></td>
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<tr>
<td></td>
<td>Type of organization: Non-profit (not a financial institution)</td>
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<td>Contact Name:</td>
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<tr>
<td>Ms. Marquita Lennon</td>
<td></td>
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<tr>
<td></td>
<td>Type of organization: Unit of State Government</td>
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<tr>
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<td>Contact Name:</td>
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<td>Phone:</td>
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<td></td>
<td>Email:</td>
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<tr>
<td>Ms. Misty Barnes</td>
<td></td>
<td></td>
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<tr>
<td></td>
<td>Type of organization: Unit of State Government</td>
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<tr>
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<td>Contact Name:</td>
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U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
WEATHERIZATION ANNUAL FILE WORKSHEET

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

| Ms. Tanyanika Grayson | Type of organization: Utility
| Contact Name:          | Phone: 205-257-2357
| Email: tg@weatherco.com |
| Ms. Wendy Littles     | Type of organization: Unit of State Government
| Contact Name:          | Phone: 334-533-3375
| Email: Wendy.Littles@adea.alabama.gov |

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

<table>
<thead>
<tr>
<th>Date Held</th>
<th>Newspapers that publicized the hearings and the dates the notice ran</th>
</tr>
</thead>
<tbody>
<tr>
<td>08/23/2022</td>
<td>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.</td>
</tr>
<tr>
<td>08/23/2022</td>
<td>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.</td>
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</tbody>
</table>

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.
# WEATHERIZATION ASSISTANCE PROGRAM

## SUBGRANTEE INFORMATION

| State: AL | Grant Number: EE0009970 | Program Year: 2022 |

### Alabama Council on Human Relations, Inc.

- **Name:** Alabama Council on Human Relations, Inc.
- **Address:**
  - 950 Shelton Mill Rd
  - PO Drawer 3770
  - Auburn, AL 36831-0409
- **Counties served:** LEE County
- **Tentative allocation:** $1,674,495.00
  - Planned units: 162
  - Type of organization: Non-profit organization
  - Source of labor: Contractors
- **Contact:** Michelle Pugh
  - **UEI:** NM15JNTXJM8
  - **DUNS:** 183860386
  - **Phone:** (334) 821-8336
  - **Fax:** (334) 826-6397
  - **Email:** michelle.pugh@achr.com

### Central Alabama Regional Planning and Development Commission

- **Name:** Central Alabama Regional Planning and Development Commission
- **Address:**
  - 430 South Court Street
  - Montgomery, AL 36104-4102
- **Counties served:**
  - ELMORE County
  - AUTauga County
  - SHELBY County
  - DALLAS County
  - MACON County
  - RUSSELL County
  - PERRY County
  - CHILTON County
- **Tentative allocation:** $3,336,898.00
  - Planned units: 362
  - Type of organization: Non-profit organization
- **Contact:** Mr. Donny Barber
  - **UEI:** TNC1GLG926U6
  - **DUNS:** 781377734
  - **Phone:** (334) 262-4300
  - **Fax:** (334) 262-6976
  - **Email:** dbarber@carpdc.com

### Community Action Agency of Northeast Alabama, Inc

- **Name:** Community Action Agency of Northeast Alabama, Inc
- **Address:**
  - 1481 McCurdy Avenue, South
  - PO Box 1487
  - Rainsville, AL 35986-1487
- **Counties served:**
  - Etowah County
  - Marshall County
  - Cherokee County
  - St. Clair County
  - Blount County
  - Dekalb County
  - Jefferson County
  - Jackson County
- **Tentative allocation:** $8,247,971.00
  - Planned units: 907
  - Type of organization: Local agency
- **Contact:** Mr. Luke Laney
  - **UEI:** HszXZk11LPLJ5
  - **DUNS:** 940616189
  - **Phone:** (256) 638-4430
  - **Fax:** (256) 638-2039
  - **Email:** luke@eaaneal.org

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PAGE, 8/18/2022 1:01:33PM

Page 1 of 5
### Community Action Agency of Northwest Alabama, Inc.

**Address:** 745 Thompson Street  
Florence, AL 35630-3867

**Counties served:** COLBERT County, LAUDERDALE County, FRANKLIN County

| Tentative allocation: $1,537,455.00 |
|---|---|
| Planned units: 145 |
| Type of organization: Local agency |
| Source of labor: Contractors |

**Contact:** Mr. Jay Hendricks  
**UEI:** TJCNCN43BLB25  
**DUNS:** 135457047  
**Phone:** (256) 383-3832  
**Fax:** (256) 766-4367  
**Email:** j.hendricks@caanw.org

### Community Action Agency of South Alabama, Inc.

**Address:** 26440 Pollard Road  
PO Box 250  
Daphne, AL 36526-0250

**Counties served:** MARENGO County, BALDWIN County, CONECUH County, MONROE County, WILCOX County, CLARKE County, ESCAMBIA County

| Tentative allocation: $2,452,635.00 |
|---|---|
| Planned units: 249 |
| Type of organization: Local agency |

**Contact:** Ms. Kimberly Barron  
**UEI:** JCFLSSH88E1  
**DUNS:** 082145368  
**Phone:** (251) 626-2646  
**Fax:** (251) 626-2613  
**Email:** kimberly.barron@caasfsa.org

### Community Action Agency of Talladega, Clay, Randolph, Calhoun

**Address:** 136 North Court Street  
PO Box 278  
Talladega, AL 35161-0278

**Counties served:** TALLADEGA County, CLEBURNE County, RANDOLPH County, CLAY County, CALHOUN County

| Tentative allocation: $2,080,501.00 |
|---|---|
| Planned units: 206 |
| Type of organization: Local agency |

**Contact:** Mr. Steinway Cash  
**UEI:** KZEPNYBRAB9  
**DUNS:** 105370493  
**Phone:** (256) 268-8042  
**Fax:** (256) 474-0854  
**Email:** steinway@caaterce.org
# U.S. Department of Energy

## WEATHERIZATION ASSISTANCE PROGRAM

### GRANTEE INFORMATION

| State: AL | Grant Number: EE0009970 | Program Year: 2022 |

<table>
<thead>
<tr>
<th>Name: Community Action Committee, Inc. of Chambers-Tallapoosa-Coos</th>
<th>Contact: Mr. Kevin Walker</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address: 170 South Broadnax Street, Dadeville, AL 36853-1704</td>
<td>UEI: GKRJR6L5JK3</td>
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<tr>
<td>Counties served: TALLAPOOSA County, COOSA County, CHAMBERS County</td>
<td>DUNS: 607565652</td>
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<tr>
<td>Tentative allocation: $901,205.00</td>
<td>Phone: (256) 825-4287</td>
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<tr>
<td>Planned units: 73</td>
<td>Fax: (256) 825-4280</td>
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<tr>
<td>Type of organization: Non-profit organization</td>
<td>Email: <a href="mailto:kwalker@ctecac.com">kwalker@ctecac.com</a></td>
</tr>
<tr>
<td>Source of labor: Contractors</td>
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<tr>
<td>Congressional districts served: AL-03</td>
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<table>
<thead>
<tr>
<th>Name: Community Action Partnership of Huntsville/Madison and Limestone</th>
<th>Contact: Mr. Steve Gentry</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address: 3516 Stringfield Road, NW, P.O. Box 3975, Huntsville, AL 35810-0975</td>
<td>UEI: KJJK911MUD1</td>
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<tr>
<td>Counties served: MADISON County, LIMESTONE County</td>
<td>DUNS: 078971595</td>
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<tr>
<td>Tentative allocation: $2,699,810.00</td>
<td>Phone: (256) 851-9800</td>
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<td>Planned units: 276</td>
<td>Fax: (256) 851-9803</td>
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<tr>
<td>Type of organization: Local agency</td>
<td>Email: <a href="mailto:sgentry@cas-htsval.org">sgentry@cas-htsval.org</a></td>
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<td>Source of labor: Contractors</td>
<td>Congressional districts served: AL-05</td>
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<table>
<thead>
<tr>
<th>Name: Community Action Partnership of North Alabama, Inc.</th>
<th>Contact: Ms. Angela Ingram</th>
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<tbody>
<tr>
<td>Address: 1909 Central Parkway, SW, Decatur, AL 35601-6822</td>
<td>UEI: CWA3M48K2JK3</td>
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<td>Counties served: MORGAN County, LAWRENCE County, WALKER County, WINSTON County, MARION County, CULLMAN County</td>
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<tr>
<td>Tentative allocation: $2,796,477.00</td>
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<td>Planned units: 288</td>
<td>Fax: (256) 355-7953</td>
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<tr>
<td>Type of organization: Local agency</td>
<td>Email: <a href="mailto:angela.ingram@capna.org">angela.ingram@capna.org</a></td>
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<td>Source of labor: Contractors</td>
<td>Congressional districts served: AL-04</td>
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<tr>
<th>Name: Community Service Programs of West Alabama, Inc</th>
<th>Contact: Mr. Joseph Cunningham</th>
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<tr>
<td>Address: 601 Black Bears Way, Tuscaloosa, AL 35401-4807</td>
<td>UEI: GKYK5UW87</td>
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<td>Counties served:</td>
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<td>Tentative allocation:</td>
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<tr>
<td>Planned units:</td>
<td>Fax: (205) 758-7229</td>
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<tr>
<td>Type of organization:</td>
<td>Email: <a href="mailto:jcunningham@cspwal.com">jcunningham@cspwal.com</a></td>
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<td>Source of labor: Contractors</td>
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U.S. Department of Energy  
WEATHERIZATION ASSISTANCE PROGRAM  
SUBGRANTEE INFORMATION  
State: AL  Grant Number: EE0009970  Program Year: 2022

<table>
<thead>
<tr>
<th>Counties served</th>
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<tr>
<td>FAYETTE County</td>
<td>$2,718,738.00</td>
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<td>SUMTER County</td>
<td>280</td>
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<td>PICKENS County</td>
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<td>LAMAR County</td>
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<td>BIBB County</td>
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<td>GREENE County</td>
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<td>HALE County</td>
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<td>TUSCALOOSA County</td>
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<tr>
<td>Source of labor</td>
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Name: Mobile Community Action, Inc.
Address: 461 Donald St.  
Mobile, AL 36617-0000

Tentative allocation: $4,029,140.00
Planned units: 429
Type of organization: Local agency
Source of labor: Contractors
Congressional districts served: AL-01
Contact: Mr. Tracy Rhodes
UFI: YC9MUGJN4Z4
DUNS: 049124688
Phone: (251) 457-5700
Fax: (251) 457-4113
Email: trhodes@mcmediume.org

Name: Montgomery County Commission, c/o Central Alabama Regional
Address: 430 S Court Street  
Montgomery, AL 36104-4102

Tentative allocation: $2,320,132.00
Planned units: 247
Type of organization: Unit of local government
Source of labor: Contractors
Congressional districts served: AL-02
Contact: Mr. Donny Barber
UFI: G7V6WJZYK5G7
DUNS: 099839086
Phone: (334) 262-4300
Fax: (334) 262-6976
Email: dbarber@carpdc.com

Name: Organized Community Action Program, Inc.
Address: 507 North Three Notch Street  
Troy, AL 36081-0908

Contact: Ms. Annette Shepherd
UFI: XM94E912XBN6
DUNS: 082060468
Phone: (334) 566-1712
Fax: (334) 566-7417
Email: ashepherd@troycable.net
U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM
SUBGRANTEE INFORMATION
State: AL  Grant Number: EE0009970  Program Year: 2022

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<thead>
<tr>
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Source of labor: Contractors
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 FACSPto 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
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 Reweathering compliance

Section 1011(b) 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
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 less

Describe the deferral Process

See Deferral Policy which is part of Health and Safety Plan.

When a home is deferred for weatherization services, the subgrantee determines if another program within that subgrantee 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.

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

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

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. Alabama will pursue the development of a Priority Measures List to be used in conjunction with Energy Audits as applicable.

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:

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

<table>
<thead>
<tr>
<th>Type</th>
<th>Approval Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Single-Family</td>
<td>12/6/2021</td>
</tr>
<tr>
<td>Manufactured Housing</td>
<td>12/6/2021</td>
</tr>
<tr>
<td>Multi-Family</td>
<td></td>
</tr>
</tbody>
</table>

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. Homes that fall outside the parameters of the Priority Measures Lists, if available, will require an audit using either a National Energy Audit Tool (NEAT) or Mobile Home Energy Audit (MHEA) whichever is applicable.

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.

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 inspect 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 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 Inspector by a Quality Control Inspector.

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

Due to the lack of available staff, subgrantees may use the Independent Auditor/QCI which will allow the auditor/assessor to be the same individual. Because this model does not allow for an independent review, the 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 QCI 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 QCI 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

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 compiled 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.

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

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

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 grantee for review and approval
Major: Notable or conspicuous in effect or scope
Minor: inferior in importance, size, or degree: comparatively unimportant

V.8 Program Management
V.8.1 Overview and Organization

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 subgrantees adhere to contractual and Federal regulatory guidelines and instructions, have adequate programmatic and financial management control, and perform work on homes by acceptable standards.
U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
STATE PLAN/MASTER FILE WORKSHEET
(Grant Number: EE0009970, State: AL, Program Year: 2022)

A ramp-up period is anticipated between July 1, 2022 and July 1, 2023 for hiring of Grantee and subgrantee staff and training purposes. Once production begins on BIL-funded units, all subgrantees will be monitored at least once each year. Subgrantees 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 subgrantee’s weatherization funds and the reallocation of those funds to another subgrantee.

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

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

Ramp-up Period: if any subgrantees begin production, the Grantee will schedule monitoring visits

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

Quarter 1 - at least 3 subgrantees
Quarter 2 - at least 3 subgrantees
Quarter 3 - at least 3 subgrantees
Quarter 4 - remaining 4 subgrantees

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

Quarter 1 - at least 3 subgrantees
Quarter 2 - at least 3 subgrantees
Quarter 3 - at least 3 subgrantees
Quarter 4 - remaining 4 subgrantees

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

Quarter 1 - at least 3 subgrantees
Quarter 2 - at least 3 subgrantees
Quarter 3 - at least 3 subgrantees
Quarter 4 - remaining 4 subgrantees

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

Quarter 1 - at least 3 subgrantees
Quarter 2 - at least 3 subgrantees
Quarter 3 - at least 3 subgrantees
Quarter 4 - remaining 4 subgrantees

Currently, the Grantee's WAP staff consists of the Division Chief serving as Interim Program Manager and one Program Monitor. The new Program Manager will be in place on September 1, 2022 and 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 QCI 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 Grantee will conduct a programmatic and technical review of subgrantees each year. Alabama is using the independent Auditor/QCI option which requires at least 10% of all completed homes to be monitored. A minimum of 10% of the house allocation per subgrantee will be visited by the monitor(s). Pervasive errors, omissions, or dissatisfaction may be investigated on site visits.

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 subgrantee 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 subgrantee agency documentation including insurance, mileage logs, time sheets, invoices, and payments to contractors.

After a monitoring visit, a report is prepared and sent to the subgrantee within thirty (30) days. This report contains an overview of the monitoring and any findings along with corrective actions, if applicable. The subgrantee 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 subgrantee will implement, including timelines, to address the deficiency observed by the Grantee during the monitoring visit. The Grantee 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 Grantee prepares a letter to identify outstanding corrective actions. The subgrantee is required to respond within 15 days. If the subgrantee 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 subgrantee program operations on an annual basis. These internal audits will be conducted in 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 Grantee and the reviews by Independent Auditors and/or State Examiners will be reported to the subgrantee 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 subgrantee or in termination of that subgrantee’s program.

Each subgrantee is required to submit monthly Production Progress Reports to the Grantee 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 subgrantee, 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:

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

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
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.

- 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 year.

It is also recommend reviewing recent budget requests, versus expenditures to see if previous budget estimates have been accurate. The resulting “Total Average H&S Cost per Unit” multiplied by the Grantee’s production estimate in the Annual File should 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.
## 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 Repair** 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.

---

**H&S Measure Matrix - Optional**

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<thead>
<tr>
<th>Enter Measure ↓</th>
<th>Enter Cost ↓</th>
<th>Enter Frequency % ↓</th>
<th>Auto Calculates</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO Alarm</td>
<td>$54.00</td>
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<td>$48.60</td>
</tr>
<tr>
<td>Smoke Alarm</td>
<td>$75.00</td>
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</tr>
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<td>ASHRAE 62.2-2016</td>
<td>$900.00</td>
<td>60.0%</td>
<td>$540.00</td>
</tr>
<tr>
<td>Install Direct-Vent Space Heater</td>
<td>$3,000.00</td>
<td>9.0%</td>
<td>$270.00</td>
</tr>
<tr>
<td>Repair Roof Leak</td>
<td>$300.00</td>
<td>9.0%</td>
<td>$27.00</td>
</tr>
<tr>
<td>Clean Gas Stove</td>
<td>$60.00</td>
<td>7.0%</td>
<td>$4.20</td>
</tr>
<tr>
<td>DWH Drip Line</td>
<td>$60.00</td>
<td>11.0%</td>
<td>$6.60</td>
</tr>
<tr>
<td>Remove UVSH</td>
<td>$70.00</td>
<td>11.0%</td>
<td>$7.70</td>
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<td>Replace Dryer vent</td>
<td>$90.00</td>
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<td>Correct Electrical Issue</td>
<td>$300.00</td>
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<td>Furnace Repair/Tune</td>
<td>$350.00</td>
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<td>$21.00</td>
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<td>Mold/Moisture</td>
<td>$400.00</td>
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<td>Fire Extinguisher</td>
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<td>Pest Removal</td>
<td>$300.00</td>
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<td>Drainage Issues</td>
<td>$200.00</td>
<td>2.0%</td>
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</tr>
</tbody>
</table>

**Total Average H&S Cost Per Unit**

$1,295.00

**Enter Estimated Production (Annual File: IV.2 WAP Production Schedule)**

4000

**Enter Estimated Program Operations Budget**

24321786

**H&S Budget (Total Average H&S Cost Per Unit * Estimated Production)**

$5,180,000.00

**Requested H&S Percentage Per Unit (H&S Budget/Program Operations)**

21.3%
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. Alabama’s Priority Measures lists’ cap incidental costs to $500.00 for ECMs, if incidental costs are grater that $500.00 the unit must be evaluated with and energy audit and the cost of the incidental repair must be included in the cost of the measure in which it is associated.

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.

Yes ☑ No ☐

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

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, subgrantee 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 subgrantee to correct such problems. The subgrantee’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 s/he 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 subgrantee, 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 subgrantee was taken to notify the client of the reason(s) for deferral.

Should a client request a second opinion on a deferral, the subgrantee 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 known 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 subgrantees shall defer work on the home until the owner completes mold remediation or another funding source funds and completes the mold remediation. Alabama weatherization subgrantees 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](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.

<table>
<thead>
<tr>
<th>Documentation Form(s) have been developed and comply with guidance?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Yes ☑ No ☐</td>
</tr>
</tbody>
</table>

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 Lead Based Paint, 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

<table>
<thead>
<tr>
<th>Concurrence with Guidance</th>
<th>Alternative Guidance</th>
<th>Results in Deferral</th>
</tr>
</thead>
<tbody>
<tr>
<td>☑</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Air Conditioning Unallowable Measure</td>
<td>☐</td>
<td>Heating Unallowable Measure</td>
</tr>
</tbody>
</table>

The replacement of Air Conditioning and/or Heating Systems must always be evaluated as an Energy Conservation Measure (ECM) first. If evaluation indicates the measure to have Savings to Investment Ratio (SIR) ≥ 1.0 it must be completed as an ECM and charged to Program Operations. When a space conditioning system does not qualify as an ECM, the following conditions must be met before the unit can be replaced or repaired with Health and Safety funds:

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

Heating Degree Days (HDD) range from 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

<table>
<thead>
<tr>
<th>DOE ☑</th>
<th>LIHEAP ☐</th>
<th>State ☐</th>
<th>Utility ☐</th>
<th>Other ☐</th>
</tr>
</thead>
</table>

DOE funds may be used to address this category

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

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

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

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

Replacement or installation of secondary units is not allowed.

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

See Hazardous Materials Disposal section for more information

### Indicate Documentation Required for At-Risk Occupants

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BIL Alabama Health And Safety Plan

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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 an At-Risk Physician/Nurse Medical Statement.

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

<table>
<thead>
<tr>
<th>Testing Protocols</th>
</tr>
</thead>
<tbody>
<tr>
<td>Make sure primary systems are present, operable, and performing correctly.</td>
</tr>
<tr>
<td>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&amp;S measure.</td>
</tr>
<tr>
<td>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.</td>
</tr>
<tr>
<td>Determine and document presence of “at-risk” current occupants when installing air-conditioning as a Health and Safety (H&amp;S) measure.</td>
</tr>
<tr>
<td>On combustion equipment, inspect chimney and flue and test for Combustion Appliance Zone (CAZ) depressurization.</td>
</tr>
<tr>
<td>For solid fuel appliances look for visual evidence of soot on the walls, mantel or ceiling or creosote staining near the flue pipe</td>
</tr>
<tr>
<td>Minimal standards for remedy include, but are not limited to the following:</td>
</tr>
<tr>
<td><strong>Ducts:</strong></td>
</tr>
<tr>
<td>Ducts testing &lt;1 pascal (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.</td>
</tr>
<tr>
<td>Clean ducts prior to sealing to ensure that sealing materials adhere and remain effective.</td>
</tr>
<tr>
<td>When sealing ducts with mastic, use fiberglass wrap for the first 3 feet next to the plenum to reinforce the mastic seal.</td>
</tr>
<tr>
<td>Replace crushed registers.</td>
</tr>
<tr>
<td>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.)</td>
</tr>
<tr>
<td>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.</td>
</tr>
<tr>
<td><strong>Controls:</strong></td>
</tr>
<tr>
<td>Check anticipator settings on gas furnace thermostats and adjust to actual amperage draw.</td>
</tr>
<tr>
<td>Replace thermostats that do not have an anticipator. This does not apply to millivolt systems.</td>
</tr>
<tr>
<td>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.</td>
</tr>
<tr>
<td>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.</td>
</tr>
</tbody>
</table>
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 assure 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, Alternative, or Deferral**
- Concurrence with Guidance [x]
- Alternative Guidance [x]
- Results in Deferral [x]

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

**Funding**
- DOE [x]
- LIHEAP [x]
- State [x]
- Utility [x]
- Other [x]

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, Alternative, or Deferral**

- [X] Concurrence with Guidance
- [ ] Alternative Guidance
- [ ] Results in Deferral

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

**Funding**

- [X] DOE
- [ ] LIHEAP
- [ ] State
- [ ] Utility
- [ ] Other

DOE funds may be used to address this category

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

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

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

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

Use proper respiratory protection while in areas containing vermiculite.

Encapsulation by an appropriately trained asbestos control professional is allowed.

Removal is not allowed.

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

**Testing Protocols**

- AHERA sample collection and testing must be conducted by a certified tester.
- Baseline environmental asbestos sampling is an allowable cost.
- Do not open any walls to check for vermiculite. Only check for vermiculite in the attic, and if found, leave it undisturbed, when possible.
- If it is necessary to go into the attic containing vermiculite insulation, limit the number of trips and the shorten the length of those trips in order to limit any potential exposure and to avoid disturbing the product as any disturbance could potentially release asbestos fibers into the air.
- Wear protective equipment when entering an attic area that may contain vermiculite insulation.
- Do not track vermiculite insulation or associated dust into the living spaces of the home.
- Follow EPA and OSHA regulations regarding the safe handling of asbestos to ensure worker and client safety.

**Client Education**

- Instruct clients in writing not to disturb suspected ACM.
- Provide asbestos safety information to the client.
- Formally notify client in writing of results if testing was performed.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

**Training and Certification Requirements**

- Assessors should be able to recognize vermiculite.
- AHERA or state certification to conduct testing.
- AHERA or other appropriate asbestos control professional certification/training for encapsulation.
## 7.2c – Asbestos - on pipes, furnaces, other small covered surfaces

<table>
<thead>
<tr>
<th>Concurrence, Alternative, or Deferral</th>
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<tbody>
<tr>
<td>Concurrence with Guidance ☑️</td>
</tr>
<tr>
<td>Alternative Guidance ☐</td>
</tr>
<tr>
<td>Results in Deferral ☐</td>
</tr>
</tbody>
</table>

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

### Funding

<table>
<thead>
<tr>
<th>DOE ☑️</th>
<th>LIHEAP ☐</th>
<th>State ☐</th>
<th>Utility ☐</th>
<th>Other ☐</th>
</tr>
</thead>
</table>

DOE funds may be used to address this category

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

Assume asbestos is present in suspect covering materials.

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

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

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.

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

### Testing Protocols

Assess whether suspected ACMs are present.

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

### Client Education

Instruct clients in writing not to disturb suspected ACM.

Provide asbestos safety information to the client.

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

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

### Training and Certification Requirements

Auditors should be able to recognize suspected ACM.

AHERA or other appropriate asbestos control professional certification/training is required to abate the ACM.
### 7.5 - Biologicals and Unsanitary Conditions
(odor, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.)

<table>
<thead>
<tr>
<th>Concurrence, Alternative, or Deferral</th>
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<tbody>
<tr>
<td>Concurrence with Guidance ☑</td>
</tr>
<tr>
<td>Alternative Guidance □</td>
</tr>
<tr>
<td>Results in Deferral □</td>
</tr>
<tr>
<td>Unallowable Measure □</td>
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<tr>
<th>Funding</th>
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<tbody>
<tr>
<td>DOE ☑</td>
</tr>
<tr>
<td>LIHEAP □</td>
</tr>
<tr>
<td>State □</td>
</tr>
<tr>
<td>Utility □</td>
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<tr>
<td>Other □</td>
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</tbody>
</table>

DOE funds may be used to address this category.

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

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

Addressing bacteria and viruses is not an allowable cost.

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

See Mold and Moisture section for more information.

#### Testing Protocols

- Sensory inspection

#### Client Education

- Inform client in writing of observed conditions.
- Provide information on how to maintain a sanitary home.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

#### Training

- How to recognize unsafe conditions and when to defer.
- Safe work practices when encountering such conditions.
### 7.6 – Building Structure and Roofing

#### Concurrency, Alternative, or Deferral

<table>
<thead>
<tr>
<th>Concurrence with Guidance</th>
<th>Alternative Guidance</th>
<th>Results in Deferral</th>
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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

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<th>DOE</th>
<th>LIHEAP</th>
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<th>Utility</th>
<th>Other</th>
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</table>

DOE funds may be used to address this category

What guidance do you provide Subgrantees 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?**

When using the Priority Measures Lists incidental repairs are capped at $500.00; if incidental repairs exceed $500.00 then the use of a NEAT/MHEA is required. When using the audit, the incidental repair cost is attributed to the cost of the measure and becomes part of the SIR.

If the cost of the repair causes the measures SIR to drop below 1.0 then the measure cannot be completed and the unit may need to be deferred.

**If priority lists are used, and these repairs are designated as Incidental Repairs, at what point is a site-specific audit required?**

According to the Priority Measures List, Incidental Repairs greater than $500.00 require a site-specific audit

#### 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**

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<th>Concurrence with Guidance</th>
<th>Alternative Guidance</th>
<th>Results in Deferral</th>
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</thead>
</table>

**Funding**

- DOE ✔
- LIHEAP ✗
- State ✗
- Utility ✗
- Other ✗

DOE funds may be used to address this category.

**What guidance do you provide Subgrantees for dealing with code compliance issues in homes receiving 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 in the client file.

Follow State and local or AHJ codes while installing weatherization measures, including H&S measures. Condemned properties and properties where “red tagged” H&S conditions exist that cannot be corrected under this guidance must be deferred.

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

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.

Sub-grantees must be aware of code compliance.

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

### 7.8 – Combustion Gases

**Concurrence, Alternative, or Deferral**

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</table>

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

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

Client Education

Provide client with combustion safety and hazards information.

Training

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

CO action levels.
### 7.9 – Electrical

**Concurrence, Alternative, or Deferral**

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</table>

DOE funds may be used to address this category

**What guidance do you provide Subgrantees 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?**

When using the Priority Measures Lists incidental repairs are capped at $500.00; if incidental repairs exceed $500.00 then the use of a NEAT/MHEA is required. When using the audit, the incidental repair cost is attributed to the cost of the measure and becomes part of the SiR.

- If the cost of the repair causes the measures SiR to drop below 1.0 then the measure cannot be completed and the unit may need to be deferred.

**If priority lists are used, and these repairs are designated as Incidental Repairs, at what point is a site-specific audit required?**

According to the Priority Measures List, Incidental Repairs greater than $500.00 require a site-specific audit

**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

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Funding: DOE funds may be used to address this category

What guidance do you provide Subgrantees 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

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Funding: DOE funds may be used to address this category

Remediation Protocols

When a minor gas leak is found on the utility side of service, the utility service must be contacted before work may proceed.
Fuel leaks that are the responsibility of the client (vs. the utility) must be repaired before weatherizing a unit.
Notify utilities and temporarily halt work when leaks are discovered that are the responsibility of the utility to address.
Test exposed gas lines for fuel leaks from utility coupling into, and throughout, the home.
Conduct sensory inspection on bulk fuels to determine if leaks exist.

How do you define allowable fuel leak repairs, and at what point are repairs considered beyond the scope of weatherization?

Fuel leak repairs are allowable when the leak is not severe enough to pose a hazard to the worker or occupant. A leak would be considered beyond the scope of weatherization if it is severe enough to pose 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

**Concerence, Alternative, or Deferral**

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DOE funds may be used to address this category

**What guidance do you provide Subgrantees 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.]**

**Concerence, Alternative, or Deferral**

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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**

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DOE funds may be used to address this category

**Client Education**

Inform client in writing of hazards associated with hazardous waste materials being generated/handled in the home.

**Training**

Appropriate Personal Protective Equipment (PPE) for working with hazardous waste materials.

Disposal requirements and locations.

Health and environmental risks related to hazardous materials.

**Disposal Procedures and Documentation Requirements**

Hazardous Waste Materials generated during weatherization work shall be disposed of according to all local laws, regulations and/or Federal guidelines, as applicable.

Documentation of proper disposal should be included in client file.
### 7.14 – Injury Prevention of Occupants and Weatherization Workers
(Measures such as repairing stairs and replacing handrails)

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DOE funds may be used to address this category.

**What guidance do you provide Subgrantees regarding allowable injury-related repairs (e.g., stairs, handrails, porch deck board)?**

Workers must take all reasonable precautions against work on homes that will subject workers or occupant(s) to health and safety risks. 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

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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 subgrantees 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, subgrantees 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, Alternative, or Deferral

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<tr>
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<td>State ☐</td>
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</table>

Funding

DOE funds may be used to address this category

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

Limited water damage repairs that can be addressed by weatherization workers are allowed when necessary in order to weatherize the home and to ensure the long-term stability and durability of the measures.

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

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

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

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

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

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

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

Minor allowable moisture related measures may include the repair of small plumbing leaks and or structural leaks which are contributing to mold/moisture issues.

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

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

Client Education

Provide client written notification and disclaimer on mold and moisture awareness.
Provide information on importance of cleaning and maintaining drainage systems.
Provide information on proper landscape design and how this impacts site drainage and moisture control.
When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

Training

Assessors should be able to identify potential or existing mold and/or moisture issues.
How to recognize drainage issues.

BIL Alabama Health And Safety Plan
### 7.17 – Pests
**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 Subgrantees for dealing with pests and pest intrusion prevention in homes slated for weatherization?

- Pest removal is allowed only where infestation would prevent weatherization.
- Infestation of pests may be cause for deferral where it cannot be reasonably removed or poses H&S concern for workers.
- Screening of windows and points of access, and incorporating pest exclusion into air sealing practices to prevent intrusion is allowed.

**Define Pest Infestation Thresholds, Beyond Which Weatherization Is Deferred**

- The threshold for pest infestation is set at $500.00.
- If the pest infestation cannot be addressed at or below this threshold it is considered beyond the scope of weatherization and the home must be deferred.

**Testing Protocols**
- Auditors assess the degree of infestation and risk to worker.

**Client Education**
- Inform client in writing of observed condition and associated risks.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

**Training**
- Auditors are trained to assess the presence and degree of infestation, associated risks, and deferral policy.

### 7.18 – Radon
**Concurrence, Alternative, or Deferral**
- Concurrence with Guidance ☑
- 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 Subgrantees around radon?**

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

- Allowable:
  - 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 mitigation is not an allowable H&S 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](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

<table>
<thead>
<tr>
<th>Concurrence with Guidance</th>
<th>Alternative Guidance</th>
<th>Results in Deferral</th>
</tr>
</thead>
<tbody>
<tr>
<td>DOE ☑</td>
<td>LIHEAP ☐</td>
<td>State ☐ Utility ☐ Other ☐</td>
</tr>
</tbody>
</table>

#### Funding

- DOE funds may be used to address this category

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

- **Smoke Alarms:**
  - Should be installed on each floor outside sleeping areas if operable alarms are not present.
  - Should be installed according to the manufacturer’s instructions.

- **Carbon Monoxide Alarms:**
  - Must be installed in every home if operable alarm is not present.
  - Should be installed according to manufacturer’s instructions.
Fire Extinguishers:
May be installed when solid fuel is present.
Should be installed according to manufacturer’s instructions.

<table>
<thead>
<tr>
<th>Testing Protocols</th>
</tr>
</thead>
<tbody>
<tr>
<td>Check existing alarms for operation.</td>
</tr>
<tr>
<td>Verify operation of installed alarms.</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Client Education</th>
</tr>
</thead>
<tbody>
<tr>
<td>Provide client with verbal and written information on use of devices installed.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Training</th>
</tr>
</thead>
<tbody>
<tr>
<td>Auditors are trained on where to install alarms.</td>
</tr>
<tr>
<td>Auditors should be aware of local (or AHJ) code compliance.</td>
</tr>
</tbody>
</table>

### 7.20 – Occupant Health and Safety Concerns and Conditions

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<thead>
<tr>
<th>Concurrence, Alternative, or Deferral</th>
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<tbody>
<tr>
<td>Concurrency with Guidance ☑</td>
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</tbody>
</table>

<table>
<thead>
<tr>
<th>Funding</th>
</tr>
</thead>
<tbody>
<tr>
<td>DOE ☑</td>
</tr>
</tbody>
</table>

DOE funds may be used to address this category

**What guidance do you provide Subgrantees 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 Subgrantees 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 Subgrantees 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.

<table>
<thead>
<tr>
<th>Client Education</th>
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</thead>
<tbody>
<tr>
<td>Inform client in writing of any known risks.</td>
</tr>
<tr>
<td>Provide client with Subgrantee point of contact information in writing so client can inform of any issues.</td>
</tr>
<tr>
<td>When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.</td>
</tr>
</tbody>
</table>

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

| Yes ☑ No ☐ |

### 7.21 – Ventilation and Indoor Air Quality

<table>
<thead>
<tr>
<th>Concurrence, Alternative, or Deferral</th>
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<tbody>
<tr>
<td>Concurrency with Guidance ☑</td>
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</tbody>
</table>
### Funding

<table>
<thead>
<tr>
<th>DOE ☐</th>
<th>LIHEAP ☐</th>
<th>State ☐</th>
<th>Utility ☐</th>
<th>Other ☐</th>
</tr>
</thead>
</table>

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.
Subgrantees are instructed to use the Residential Energy Dynamics (RED) ASHRAE 62.2-2016 calculator located at [www.residentialenergydynamics.com](http://www.residentialenergydynamics.com)
The use of balanced ventilation systems is encouraged.

**Client Education**

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

**Training**

ASHRAE 62.2 training, including proper sizing, evaluation of existing and new systems.
Subgrantees are instructed to use the Residential Energy Dynamics (RED) ASHRAE 62.2-2016 calculator located at [www.residentialenergydynamics.com](http://www.residentialenergydynamics.com)

### 7.22 – Window and Door Repair and Replacement, Window Guards

**Concurrence, Alternative, or Deferral**

| Concurrence with Guidance ☑ | Alternative Guidance ☐ | Results in Deferral ☐ |

**Funding**

<table>
<thead>
<tr>
<th>DOE ☑</th>
<th>LIHEAP ☐</th>
<th>State ☐</th>
<th>Utility ☐</th>
<th>Other ☐</th>
</tr>
</thead>
</table>

DOE funds may be used to address this category

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

Repair using H&S funds is allowed if:
It resolves a bulk water intrusion issue that is the cause of visible biological growth and;
Is well documented with written explanation and photos of the biological growth in the client file.
Replacement of doors and widows is not allowed with H&S funds.
Window and door replacements shall not be included in the air sealing ECM

**How do you define "minor" or allowable window and door repairs, and at what point are repairs considered beyond the scope of weatherization?**

When using the Priority Measures Lists incidental repairs are capped at $500.00; if incidental repairs exceed $500.00 then the use of a NEAT/MHEA is required. When using the audit, the incidental repair cost is attributed to the cost of the measure and becomes part of the SIR.
If the cost of the repair causes the measures SIR to drop below 1.0 then the measure cannot be completed, and the unit may need to be deferred.

**Testing Protocols**

N/A
<table>
<thead>
<tr>
<th>Client Education</th>
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</thead>
<tbody>
<tr>
<td>Provide written information on lead risks and mold wherever issues are identified.</td>
</tr>
<tr>
<td>Training</td>
</tr>
<tr>
<td>Awareness of guidance.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>7.23 – Worker Safety (OSHA, etc.)</th>
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<tbody>
<tr>
<td><strong>Concurrence, Alternative, or Deferral</strong></td>
</tr>
<tr>
<td>Concurrency with Guidance ☑</td>
</tr>
<tr>
<td>Workers must follow OSHA standards where required and take precautions to ensure the H&amp;S of themselves and other workers.</td>
</tr>
<tr>
<td>All Subgrantees and contractors must maintain compliance with the current OSHA Hazard Communication Standard, including on-site organized Safety Data Sheets (SDS) (formerly called MSDS).</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Funding</strong></th>
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<tbody>
<tr>
<td>DOE ☑</td>
</tr>
<tr>
<td>DOE funds may be used to address this category</td>
</tr>
</tbody>
</table>

**How do you verify safe work practices? What is your policy for in-progress monitoring?**
Grantees must verify that Subgrantees, crews and contractors follow safe work practices.

<table>
<thead>
<tr>
<th><strong>Training and Certification Requirements</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Use and importance of PPE.</td>
</tr>
<tr>
<td>Safety training appropriate for job requirements.</td>
</tr>
<tr>
<td>OSHA 10-hour training meets this requirement and is an allowable use of T&amp;TA funds for Subgrantee Staff and Contractors working in the program</td>
</tr>
<tr>
<td>Ongoing training as required in Hazard Communication Program.</td>
</tr>
</tbody>
</table>