

## **PY 2015 DOE Weatherization Assistance Program**

### **Program Guidance and Budget and Work Plan Preparation**

July 10, 2015

The following program guidance is designed to provide assistance to the CAAs in preparation of the PY 2015 DOE Weatherization budget and work plan and to highlight the areas of significance for consideration in administration of the program.

More detailed guidance for administering DOE Weatherization can be found in the following references or by contacting Kathy Kinch or Joann King at MaineHousing.

- 10 CFR Part 440 and 10 CFR 600 – DOE Regulations
- PY 2015 Weatherization Assistance Program State Plan
- PY 2015 Weatherization Assistance Program – Subgrant Agreement
- DOE Weatherization Program Notices
- MaineHousing Weatherization Program Notices
- Weatherization Program Rule--MaineHousing Rules, Chapter 25
- Maine Weatherization Standards Manual, revised April 1, 2011
- ECOS Task Code Specifications, updated October 2013
- Northeast Weatherization Field Guide - 2001

### **General Program Information**

- **Eligible Households:** DOE income-eligibility guidelines for DOE are higher than LIHEAP. For DOE, the household income must be at or below 200% of the federal poverty level (FPL). CAAs should use one of the following means to determine income-eligibility:
  - a. LIHEAP application certified-eligible anytime during the 12 months preceding the onsite energy audit date. However, if a household has been denied on a subsequent LIHEAP application, the household/unit is no longer eligible for WAP services (denial overrides the prior certification date). Prior to conducting an energy audit, CAA should re-verify a household's eligibility to ensure that their most recent LIHEAP application has not been denied.
  - b. Use LIHEAP guidelines to calculate household income and determine percentage of FPL.

- **Per-Unit-Averages** apply to the contract term (April 2015-March 2016). Waivers for PUA overages on individual jobs are not required. Each CAA is responsible for managing/tracking their actual PUA amounts to ensure they are within the limits listed below.
  - Labor, materials and support: ≤\$7,105
  - Health & Safety: ≤\$800
  - Incidental Repairs are limited to no more than 15% of the total cost of weatherization tasks funded by DOE. Total cost of weatherization equals Conductive + Air Infiltration + Mechanical categories on the work order.
- **Waivers:** It is important to note that the above policy with respect to H&S and IR averages does not negate the need for waivers. If the dwelling, client, or activity/task/work scope do not meet (or fall outside of) DOE and MaineHousing guidelines, the CAA must submit a waiver prior to proceeding with any work. For example, waivers must be submitted for the following (not an exhaustive list):
  - Water heater replacement is allowed under WAP on a case-by-case basis only. Therefore, CAA would need to submit a waiver request prior to proceeding.
  - Air Infiltration SIR is < 1.0
  - Duct Leakage SIR is < 1.0
- As a reminder, meeting the 15% IR limit over the contract term does NOT mean you can install measures that are NOT “WAP eligible”. For example, roof replacements are not allowed and waivers will not be granted.
- **Unvented Combustion Space Heaters:** Per DOE requirements (WPN 11-6), unvented combustion space heaters must be removed prior to weatherization, except as secondary heat where the unit conforms to ANSI Z21.11.1. Deferral of services is required for units that do not meet ANSI Z21.11.1 until removal or conforming unit is in place.

If an unvented combustion space heater is a secondary heat source, it may remain in use provided it conforms to ANSI Z21.11.1. In such cases, the audit/job file must include a photo of the ANSI compliance label affixed to the unit.

Statement by client agreeing not to use non-conforming unit is not acceptable.

### **Prioritization and Wait List Requirements**

CAAs are required to develop and maintain a wait list consisting of all LIHEAP-eligible households that have not previously received weatherization services funded by a MaineHousing program.

Priority for weatherization services will be identified from the annual report provided by MaineHousing, which lists LIHEAP-eligible households, their annual energy

consumption, and their percentage of energy burden, and identifies households with members who are susceptible to hypothermia – i.e. 60 years of age or older, disabled and/or 24 months of age or under. This information is the basis for determining production targets and wait lists.

The numbers of households with members who are susceptible to hypothermia are converted into percentages of the CAA's entire wait list, which should correlate to production data. The percentage of owner-occupied and renter-occupied units weatherized should also correspond to their percentage of the wait list.

CAAs have the option to further prioritize services to high energy use/energy burden households by submitting agency-specific plans during the work plan and budget approval process.

Single family units will receive at least 70% of all services (refer to Multifamily Policy). MaineHousing sets multifamily (percentage) limits by county using the housing tenure indicated in the U.S. Department of Energy or Comprehensive Housing Affordability Strategy data (whichever is more favorable). Each CAA is required to submit a monthly demographic report, which indicates the number of completed units by type – i.e. single family, mobile home, and multifamily (5 or more units per site). MaineHousing reviews/monitors these reports to ensure compliance.

### **Conflict of Interest Procedures**

The CAA must disclose potential conflicts of interest as prescribed in Section 20 and Appendix D of the 2016 Weatherization Assistance Program Subgrant Agreement. CAAs cannot proceed with WAP until MaineHousing has approved in writing the Disclosure Form (attached) and/or the CAA's plan to manage the potential conflict.

The disclosure must be approved by MaineHousing prior to the CAA performing the energy audit.

### **CAA Payments to Subcontractors**

CAAs must pay subcontractors for work performed within thirty (30) calendar days of receipt of the subcontractor's invoice. This requirement applies to any and all work performed under **DOE**, HEAP Wx, and CHIP. CAAs must perform any required inspections of the subcontractor's work within this 30-day time period.

**Add Work:** If upon inspection, the CAA adds work not called for in the original work order, the CAA must still pay the subcontractor for the original work performed within thirty calendar days of receipt of the subcontractor's original invoice.

**Rework:** If upon inspection, the CAA issues a subcontractor a "rework" order due to deficient or incomplete work on the part of the subcontractor, the CAA may delay payment to the subcontractor. Once the subcontractor completes the rework, the CAA must inspect the work and pay the contractor within thirty days of the date the rework is completed.

## **Billing Weatherization Jobs**

Billing packets must include the Monthly Billing Summary, Demographics and Completion Lists, and the following documents:

<b>Documentation Requirements for all jobs completed in ECOS:</b> All documentation listed must be uploaded to the "Files" section within the job.	
1	Site plan sketch
2	Elevation sketch or pictures to identify segments
3	Check-off list of written materials provided to client during audit
4	Client/Owner Consent Form: signed by CAA and property owner
5	ASHRAE 62.2–2013 Spreadsheet
6	Mold Checklist
7	Photo documentation: <ul style="list-style-type: none"> <li>• Dwelling exterior (all sides) Pre-weatherization photos to support the energy auditor's assessment (i.e. condition of the dwelling and the areas that will be treated)</li> <li>• Post-weatherization photos of installed measures (all that are accessible and visible for inspection)</li> <li>• ANSI Z21.11.1 compliance label for unvented combustion space heaters used as a secondary heat source (if applicable)</li> </ul>
8	Inspection/Completion form with appropriate signatures
9	Contractors' Release of Lien
10	Proof of ownership documentation
11	Lead Paint Inspection Checklist
12	Change Orders with appropriate signatures (if applicable)
13	Contractor invoices
14	MaineHousing approved waiver request (if applicable)
15	Incidental Repairs: notes to document relationship of IR measures with ECMs
16	Final Ventilation Inspection Checklist
17	IAQ Exhaust Device Information Sheet
18	Power Source Sign-off
19	SHPO - Section 106 Checklist (if applicable)
20	Thermal Barrier Application Verification (if applicable)
<p><b>Crew Jobs:</b> In addition to the documents listed above, billing packets for crew jobs must include the MEAFF form and MEADOW report.</p>	

- CAAs can only bill MaineHousing for a job after all work has been finished and the final inspection has passed. Final inspections must be completed and passed by a BPI Certified Quality Control Inspector (QCI) or an inspector who has been approved by DOE.
- Jobs with Wx task or H&S issues identified at final inspection must be re-inspected and “passed” after reworks or mitigation tasks are installed, even when such tasks are funded with non-WAP funds.
- Consent and Completion forms must be signed by the building owner and the client. “Owner” is defined as the owner listed on the Proof of Ownership document. Other household member signatures are not acceptable.
- CAAs must submit billings by the 20<sup>th</sup> of each month.
- CAA must complete and inspect all jobs by 03/31/2016. The final PY 2015 billing must be submitted to MaineHousing by 04/30/2016.
- Any corrections to billings, reworks, and/or additions to Wx jobs completed and/or billed to MaineHousing after 04/30/2016 may not be paid.
- Incomplete or unacceptable billing packets will be returned to the CAA for correction.
- MaineHousing reserves the right to withhold payment until billing is received and approved as accurate and final.
- To ensure that jobs are billed during the correct grant timeframe, MaineHousing has established the job “end date” as the date the client signs the Completion Form. If this date is more than 4 weeks beyond the final test date (inspection date), the CAA must explain in job file.
- Jobs cannot be billed to a grant if the “end date” is outside of the grant period.

## **Monitoring**

- MaineHousing will monitor CAA production schedules. For those CAAs that do not meet their production schedules, MaineHousing may withhold future payments to ensure that cash payments balance with actual work performed. MaineHousing retains the right to provide additional service providers within regions where the CAAs are unable to meet contract obligations.
- MaineHousing will perform program and fiscal monitoring to satisfy DOE program oversight requirements. Program and fiscal monitoring will include the items described below.
  - Regular field monitoring of work performed – completed and in progress.
  - Review of project files for complete data including client income verification, properly completed program forms, contractor invoices and pictures.
  - Assessment of customer education and satisfaction with services received.
  - On-Site fiscal review of each agency at least once per year. Fiscal Monitoring includes the following:
    - review of A-133 audit reports;

- review of expenditures, source documentation and cost allocation;
  - review of compliance with OMB Circulars A-110 and A-122;
  - review of productivity to work plan projections;
  - comparison of program expenditures to budget and work plan; and
  - analysis of program costs including administration, delivery of services and deficits in the program, if any.
- Maine's PY 2015 DOE grant includes funding set aside for serving Native Americans. The amounts of funding dedicated to each tribal organization are outlined on the allocation schedule enclosed with this guidance. Agencies administering these funds (ACAP, PCAP, & WHCA) must describe in their work plan how they will provide Weatherization services to the Native American Tribal Organizations in their service areas. In addition, agencies are required to identify Native American units when they are billed to MaineHousing as completed Weatherization units.

### **Budget Preparation**

Each CAA is required to develop a budget for DOE Wx for the PY 2015 grant period. CAAs are also required to submit a work plan describing the agency's policies and procedures for delivering DOE Wx. Together, the budgets and work plan should address all weatherization services that CAAs plan to provide with its PY 2015 allocation. The following attachments are provided to aid in the development of the budget and work plan:

- DOE Wx admin and production allocations
  - Budget Form for DOE Wx
  - Support Salaries Schedule for DOE Wx
  - DOE Monthly Billing Summary
  - Weatherization Completion List
- Projected expenditures for installed weatherization and repair materials should be recorded on the line marked Weatherization Materials. Do not include subcontractor or crew labor; they go on the Direct Labor & Fringe line. Again, report the number of household units you expect to weatherize.
  - Supporting schedules for the following line-items must be submitted as part of the budget:
    1. Support Salaries & Fringe (use **Support Salaries Schedule form**)
    2. Equipment Purchases
    3. Support "Other"
    4. Administration - include a copy of your agency's HHS approved Indirect Rate Agreement, if applicable
    5. Production Schedule

**Support Salaries Schedule:** The Support Salaries Schedule is designed to present a more complete picture of how staff time and salary cost will be divided between MaineHousing's WAP programs and other agency programs. CAAs are requested to report salaries only on this schedule. Federal cost principles require that staff salary allocations, between two or more programs, should be proportionate to the actual amount of time that staff work on those programs, as documented by signed time sheets. Salaries and fringe budgeted to federally funded programs should reflect an agency's best projections for how much time CAA staff will work on different programs. Final billings must be based on actual time and efforts, not budgeted. CAA staff must support time billed to MaineHousing's funded programs with task lists (nouns and verbs).

The DOE Budget form and Support Salaries Schedule are available in MS Excel spreadsheet format.

### **Work Plan Preparation**

Submission of a work plan is required. The work plan should summarize the agency's policies and procedures for delivering DOE Wx and describe how the CAA will meet major program requirements. The following is a list (not exhaustive) of topics that should be covered in the work plan. Work plans that do not adequately address these topics will be returned for revisions.

1. Production Schedules - projected number of units to be completed and billed each month under the DOE Wx programs
2. Priorities for Weatherization and Wait List policies - describe how the agency will prioritize households
3. Provide samples of the contracts your agency uses for weatherization contractors
4. Names of energy auditors and inspectors and their relevant experience in and certifications for weatherization
5. Delivery Methods - Crews, Contractors
6. Geographic considerations, transportation
7. Significant changes in policies or procedures, new initiatives
8. Efforts to leverage other non-federal resources
9. Documentation to validate POI coverage
10. EPA Lead Renovation, Repair and Painting Rule – explain how CAA will ensure contractor compliance

Before submission to MaineHousing, the completed work plan and budget should be signed by either the CAA's Housing Director or Executive Director.

A twenty-five percent (25%) advance will be provided once MaineHousing has approved CAA's budget, work plan, and executed contract.