

Measure Skipping Frequently Asked Questions

To be posted on EERE Website

Supplement to WPN 16-8 Energy Audit Submittal Procedures

1. What is the procedure to follow if a building owner or occupant declines a measure listed in the audit?

- A. The prioritizing of energy saving measures must be accomplished using generally accepted engineering methods. Those methods must be approved by DOE. Allowing the refusal of a measure by a building owner or occupant would not comply with these basic rules. If a measure is declined, appropriate client education techniques will often eliminate the client's concern.

If after explanation and discussion with the building owner or occupant, they still decline the measure and the *auditor deems the reason for declining the measures as legitimate*, the auditor should complete all other weatherization measures and include in the client file a comprehensive explanation of the rationale for skipping the specific measure.

(See following FAQs providing information on reasons that are NOT considered legitimate reasons for declining a measure.)

If the auditor *deems this is not a legitimate reason for declining the measure*, the situation must be fully documented in the client file. The work would be completed with installation of only measures having a SIR higher than the declined measure. The client must be informed (documented) that the home cannot receive further work after the completion.

2. Subgrantees at times are not adequately trained to perform certain measures. Can those weatherization measures be skipped for that reason?

- A. No, lack of training is not a legitimate reason to skip a measure. It is expected that Grantees will provide adequate training for Subgrantees on audit procedures and measure installation methods. Ideally this training should be provided prior to the implementation of the approved audit. Staff and contractors do move on, so there may be brief times that a lack of expertise exists. Standard procedure should be to postpone a job(s) requiring priority measures that cannot be installed due to lack of trained staff until adequate

training is acquired. Training for measure installation is typically available within a reasonable time.

3. What happens if a client objects to a certain material, as explained by the auditor *prior to work beginning*, because they perceive it may do harm to themselves or their home?

A. If the client objects to a measure prior to work beginning, alternate materials should be researched as appropriate to ensure the safety of the proposed measure. Client education should be the first procedure. If that fails it may be possible to re-run the audit with a different but acceptable material to determine if the substitute material is cost effective. If no cost effective option for the material can be identified, the job must be deferred due to client refusal unless the measure has the lowest SIR.

4. *After a job has begun* and due to scheduling, measures are installed with a low priority and during the process of installation, the client declines a higher priority measure. What can be done at that point?

A. The job would be complete at the time of the client declining the higher priority measure. Only measures having a SIR higher than the declined measure may be installed unless a lower priority measure has already been installed. This should be clearly explained in client file documentation. Some agencies include a statement for client signature that states the client is aware and accepts all WAP rules, including the specific services and measures determined by an energy audit.

5. Can a measure, categorized in the Grantee's approved audit as a General Heat Waste (GHW) measure be skipped because the client just doesn't want it installed.

A. By definition, GHW measures are not prioritized by the audit tool. This is for GHW measures that the Grantee clearly designates as such and are approved by DOE as GHW measures in the audit procedures approval. If a Grantee chose to include measures that could have been approved as GHW in the SIR calculations and measure priorities in the audit tool, the prioritized measure must be treated as other prioritized measures and not skipped. While approved priority lists may list GHW measures at the top of the list, there is no strict prohibition from skipping an individual GHW measure for any documented

reason (including declined by client), if the measure is a specifically approved GHW measure, not prioritized by SIR from the approved audit tool.

6. One clause in WPN 11-6 under “Grantee Health and Safety Plan Updates” (page 10) can be perceived to imply that measure skipping, resulting in partial weatherization of the unit, may take place in some situations to avoid installing a measure that may exacerbate a H&S hazard. Can a measure be skipped in this case?

A. The intent of this section of WPN 11-6 is for a Grantee to explain how a variety of situations will be treated. A prioritized Energy Saving Measure (ECM) and any Health & Safety hazard may not be ignored. This is required by 10 CFR Part 440. The situation must be fully explained to the client verbally and in writing and an appeal process must be in place. Whether or not the problem is pre-existing or will be created by a weatherization measure, deferral of the job must be a consideration until other funding is available for correction (if out of the scope of the WAP). The weatherization measure may not be skipped in an attempt to avoid the health & safety issue. The only possible exception is if the ECM will cause the health & safety issue and the ECM has the lowest SIR on the prioritized list. A full explanation must be documented in the client file.