

# Kansas Weatherization Assistance Program



Subrecipient Procedure Manual  
For Managing the  
Low-Income  
Weatherization Assistance Program



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# 1 GRANT GUIDANCE

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## 1.1 OVERVIEW

### 1.1.1 Mission Statement

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.

### 1.1.2 Introduction

The Kansas Weatherization Procedures Manual provides guidelines or standards to subrecipients regarding the management and proper delivery of weatherization services for residential buildings. The purpose of the manual is to ensure that all applicable Federal, State, and local rules and regulations are followed while delivering a high quality and uniform service at a reasonable cost. The success of this program depends upon agencies having a full understanding of the State's Weatherization Procedures Manual.

The objective of this document is two-fold. First, it serves to outline the management and operation for agencies administering the Program. It is anticipated that these Standards will help ensure that weatherization program funds are used in the most cost-effective manner possible. Second, this procedures manual serves to define the appropriate application of weatherization measures for each residence served and sets the guides for the expectation of quality throughout the program.

The Weatherization Assistance Program (WAP) has changed substantially, both technically and administratively, since its inception in 1975. The weatherization process continues to evolve in response to changes in funding, weatherization technology, program rules, and administrative personnel. The Kansas Weatherization Procedures Manual will be used to implement and document these changes as they occur.

This document is intended to represent the best thinking at the time of writing. It is also intended to be a dynamic document, changing as necessary to reflect changes throughout the program.

All management decisions, testing procedures, inspections, and safety checks performed by agency personnel and representatives will be done with the attempt to follow the tone and spirit of these standards.

From time to time, these standards may be amended and/or revised to reflect changes in State or Federal regulations, advances in technology, and/or innovative approaches to weatherization. These standards are organized to easily accommodate changes. In this sense, they will never be complete. In preparing this edition, some topics were almost certainly overlooked. The Standards will become more complete and comprehensive with use as omissions are identified and new topics are addressed with new policy or guidance.

### 1.1.3 Scope

The Weatherization Procedures Manual shall apply to all subrecipients and their representatives providing Weatherization Assistance Program services.

The Weatherization Procedures Manual provides guidelines for the management and implementation of the Weatherization Assistance Program.

These standards are not intended to conflict or superseded Federal, State, or local laws, rules, and regulations. These standards are intended to be utilized in conjunction with 10 CFR Part 440, OMB Title 2, Subtitle A, Chapter II, Part 200; Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, and 2 CFR 910.

These standards also provide guidelines for the installation of energy conservation measures, allowable incidental repairs, and Health and Safety repairs. These standards do not intend to abridge safety, health, environmental, or local codes or other ordinances. Such requirements, if more stringent than these, shall apply.

All questions concerning the content or implementation of the standards should be directed to KHRC.

#### 1.1.4 Policy Advisory Council (PAC)

The purpose of the Policy Advisory Council (PAC) is to serve in an advisory capacity to the Kansas Housing Resources Corporation in the administration and development of the Weatherization Assistance Program. PAC members assist the program by bringing special qualifications, professional and personal networking, and sensitivity with respect to solving the problems of low-income persons across the State. Membership can include organizations, agencies, programs, and individuals that broadly represent low-income persons within our target populations. (10 CFR 440.17)

#### 1.1.5 Effective Date

All weatherization activities performed or completed on or after the specified implementation date of this Manual shall comply with these standards.

All dwelling units completed after the effective date shall comply with these standards.

#### 1.1.6 Amendments to the Weatherization Procedures Manual

From time to time, these standards may be amended and/or revised by KHRC to reflect changes in State or Federal regulations, advances in technology, and/or innovative approaches to weatherization. KHRC encourages agencies to submit suggested changes to these Standards that will result in the delivery of services in a more cost-effective manner while continuing to provide high quality work.

Amendments to these standards will not become effective until thirty (30) calendar days from the date of KHRC's approval and agency notification, except under the following conditions where amendments or revisions will become effective immediately:

Changes in State or Federal law or regulations mandate immediate implementation; or

The KHRC determines that an emergency situation exists, such as a potential threat to life, limb, or personal property, and the proposed amendment and/or revision is necessary for the protection of the health and welfare of clients and workers.

Agency personnel may submit comments and suggested changes or revisions to these standards to KHRC at any time. Suggested changes to the standards must be accompanied by supporting documentation.

## 1.2 PROGRAM MANAGEMENT AND ADMINISTRATION

### 1.2.1 Grant Agreements

#### 1.2.1.1 *Soliciting Providers for Weatherization Program Services (10 CFR 440.15)*

Primary service delivery is provided by community-based, nonprofit, and local government agencies. See [www.kshousingcorp.org](http://www.kshousingcorp.org) for Map of Service Areas. Kansas Housing Resources Corporation (KHRC) defines the above entities as local agencies or subrecipients.

Any new or additional subrecipient is selected on the basis of public comment received during a public hearing conducted pursuant to 10 CFR 440.14(a) and other appropriate findings regarding:

The subrecipient's experience and performance in weatherization or housing renovation activities;

The subrecipients experience in assisting low-income persons in the area to be served; and

The subrecipient's capacity to undertake a timely and effective weatherization program.

KHRC gives preference to any Community Action Agency (CAA) or other public or nonprofit entity which has, or is currently administering, an effective program under this part or under title II of the Economic Opportunity Act of 1964, with program effectiveness evaluated by consideration of factors including, but not necessarily limited to, the following:

- The extent to which the past or current program achieved or is achieving weatherization goals in a timely fashion;
- The quality of work performed by the subrecipient;
- The number, qualifications, required certifications and experience of the staff members of the subrecipient; and
- The ability of the subrecipient to secure volunteers, training participants, public service employment workers, and other Federal or State training programs.
- Demonstrated fiscal accountability.

KHRC may terminate financial assistance under a contract or subrecipient agreement for a grant period after providing the subrecipient notice of the reasons for termination as outlined in the section on [High Risk](#) and allowing the subrecipient to be heard.

If, in a particular geographic area, a program or subrecipient has been terminated, or failed to meet KHRC's requirements in the previous program year, a successor agency that operates in substantially the same manner will be considered.

Should a subrecipient decline an award or fail to acknowledge acceptance of an award, K-WAP shall release the funds obligated for the award. K-WAP shall provide the subrecipient with written notice of the intent to release funds. "Release of Funds" is defined as de-obligating the funds from the encumbrance system in KHRC. After a subrecipient has been notified and the grant is still not accepted, procedures to select a new subrecipient for that area may be implemented.

The entire geographical area of Kansas shall be served by the Weatherization Assistance Program.

#### 1.2.1.2 Grant Award Governance

All subrecipient agencies receiving a grant award for providing weatherization services are bound by the grant award documents, payments, and financial reporting requirements. Specific procedures must be followed to initiate grant activities, receive payments or reimbursements for expenditures, and to report financial and program activities.

The issuance of all grant awards for the weatherization program shall be governed by:

- Authorizing Statute 42 USCS § 6861.
- Applicable program regulations, including DOE 10 CFR 440 - Weatherization Assistance for Low Income Persons/Final Rule.
- OMB Circular 2 CFR Part 200 as amended by 2 CFR part 910 at <http://www.eCFR.gov>. Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards; Final Rule.
- KHRC contracts to local agencies prior to the start of the fund source program year. Upon the subrecipients signing of the grant, the terms and conditions of the grant become the agreement between the subrecipient and KHRC, which sets forth the manner that the subrecipient shall operate the program.
- National Policy Assurances in effect on date of award at <http://energy.gov/management/office-management/operational-management/financial-assistance/financial-assistance-forms>.

#### 1.2.1.3 Program Year

Fund source program years are as follows:

DOE – July 1st through June 31st.

LIEAP - April 1st through March 31st.

#### 1.2.1.4 Allocations

Initial allocation of funds for the DOE and LIEAP grants to local agencies will be based on the base formula developed with data from the American Community Survey 5-year Estimates. These values will be updated as the 5-year estimate data becomes available. Other contributions/ award allocations will be based on the agreed upon procedures from the contracting or awarding source documents.

KHRC retains the right to allow for re-allocation of funds to subrecipients and across budget categories that meets the needs of targeted Kansas citizens. Active management and re-allocation of the grant allows the grant to be fully expended during the budget period.

#### 1.2.1.5 Budget

The budget, budget worksheet, and production schedule shall be used as the financial plan to operate the weatherization program. Grant expenditures shall be in accordance with the approved budget and detailed budget worksheet. Please also see [Allowable cost/ Budget Categories](#) in this document.

Grant funds should be expended during the fund source program year. KHRC shall be notified by the agency, in writing a minimum of 90 days before the grant closes, if funds will not be fully expended. The inability to expend funds could affect future grant awards. KHRC may deem it necessary to recoup and redistribute a portion of the grant balance. The remaining balance of the grant may be forwarded to the next program year on a case by case basis.

#### 1.2.1.6 Grant Award Changes and Amendments

KHRC or the subrecipient may initiate amendments during the course of the contract period to change expenditures or production by mutual agreement. EXCEPTION: If the total changes do not exceed five percent (5%) of the total grant award, prior approval is not required. However, KHRC is still to be notified of budget revisions under 5%.

Administrative expenditures may not exceed the admin budget. Administrative costs which exceed the approved administrative budget shall be considered unauthorized costs and recouped. Admin funds may be transferred to Program Operations.

Program Operations is broken down into the following categories. Local agencies may transfer funds between these categories up to 5% of the total award.

- Material
- Labor
- Program Support

Health and Safety (H&S) expenditures may not exceed the H&S Budget. H&S funds may be transferred to Program Operations.

Training and Technical Assistance (T&TA) expenditures may not exceed the T&TA budget. T&TA funds may be transferred to Program Operations after contacting KHRC. All T&TA needs across the state will be met before converting to program operations.

Liability Insurance and Audit funds may be transferred to [Program Operations](#).

Budget changes must be submitted no later than 30 days prior to the termination of the grant award.

The subrecipient shall obtain prior approval for any changes exceeding 5% of the total grant award to the approved budget, budget worksheet, or production schedule of the approved project.

The subrecipient must complete the minimum total number of homes required on or before the ending date of the project period. All costs incurred for weatherizing units that do not have final inspections prior to the project ending date shall be completed with carryover funds, if available, and charged to the next program year when they are reported as complete. If subrecipients cannot complete the minimum production in accordance with the current agreement, written communication shall be sent to KHRC stating the reason(s) why production cannot be met, a revised production schedule, and a revised budget if necessary. Failure to comply may result in withholding of cash payments until the subrecipient is in compliance with the approved production schedule.

When additional funds are available after a contract is made between KHRC and the subrecipient, KHRC, with mutual agreement of the agency, may increase the contract amount through a standard amendment.

A standard amendment requires revision to the original budget, budget narrative, production schedule and authorized signatures from KHRC and the subrecipient.

No amendments may be made after the close of the contract period.

### 1.2.2 Participation in Additional Evaluations/ Studies

K-WAP and subrecipients are encouraged to participate in studies related to the Weatherization Program. While national-level studies allow us to see macro elements, by participating in well-designed State level or regional level studies, more clarity can be attained on the impact specific protocols have on energy savings and other benefits garnered through WAP. Before participating in evaluations or studies, subrecipients shall first notify KHRC of their intent and allow ample time for KHRC to review and provide guidance on the proposal. Information about who is conducting the study, for what purpose, the time commitments, and where the results will be shared will need to be defined. Subrecipients must ensure that the privacy of client is protected. See section Maintaining the Privacy of Recipients of Services, and WPN 10-08.

### 1.2.3 Bonding Requirements

The bonding requirements of a recipient will be accepted if the awarding Subrecipients interest is adequately protected. If not, there are specific requirements described in Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards 2 CFR 200.325.

KHRC requires the following:

#### 1.2.3.1 Fidelity Bonds

Fidelity bond coverage is required for appropriate subrecipient officials. Coverage must be secured in a minimum amount of \$25,000 for each person authorized to sign or countersign checks or to transport, maintain custody of, or disburse amounts of cash over \$100. Blanket bonds which provide for the maximum are allowed. Persons who handle only petty cash need not be bonded. The K-WAP must be notified by the subrecipient within thirty days of any changes in bonding coverage.

### 1.2.4 Conflicts of Interest

Subrecipient staff shall conduct themselves in an ethical manner at all times, avoiding both actual conflicts of interest and the appearance of conflict(s) of interest. No subrecipient employee, officer, or agent shall participate in the selection, award, or administration of a contract supported by federal funds if a real or apparent conflict of interest would be involved. Such a conflict would arise when the employee, officer, agent, relative\* or an organization which employs, or is about to employ any of the parties indicated herein, has a financial or other interest in the firm selected for an award/contract. The officers, employees, and agents of KWAP shall neither solicit nor accept gratuities, favors, or anything of monetary value from subcontractors or parties to sub-agreements.

Subrecipient staff, that act in a decision-making capacity with respect to KWAP funds, or are in a position to influence a decision, should avoid any known or perceived conflicts. Actual or perceived conflict(s) of interests are possible when subrecipient employees, board of directors or any relatives of either, have an interest in a business (or organization) providing services, materials, or are associated with a property anticipated to receive weatherization services. Eligible clients who are employees, board members, or relatives of either are not automatically barred from KWAP services, nor are properties owned or operated by the subrecipient, subrecipient employee, or board member. However, the following steps must be taken:

The subrecipient must contact KHRC in writing (email is acceptable) immediately upon receiving the application. Any special approaches or steps taken to safeguard, prevent, or minimize the conflict of interest should be declared.

All applicable program rules and guidance must be adhered to.

After the initial audit, the subrecipient must submit the house inspection form, the REM Improvement Analysis, and the proposed work scope to KHRC for review and approval. Any subsequent change orders must also be submitted for review.

Documentation of the situation and the approval will be filed in the client file.

\*A “relative” is defined as an employee’s spouse, child, grandchild, parent, grandparent, brother or sister (including step/half-brother and step/half-sister), their spouses, and the parent, brother, sister or child of an employee’s spouse or domestic partner.

In addition to the circumstance above, subrecipients should document any other actual or perceived conflict of interest in the client file and any precautionary steps taken. If appropriate, the above steps for a KHRC review could also be taken.

Auditors and inspectors (agency or contracted) shall not audit or inspect any properties occupied, owned, rented, or managed by themselves or their relatives for weatherization purposes.

Subrecipient staff acting either as individuals or on behalf of an outside contracting firm may not solicit nor provide contractor services to low-income households who have received or been deemed eligible for KWAP services. Low-income households seeking work from private contractors should be advised to consult with other sources. Subrecipient staff that offers other energy or building repair services for a fee to the general public may not also perform these same services for the subrecipient.

Any subrecipient staff member who originally establishes a relationship with the household as a representative of the WAP must not transition that relationship to one where they subsequently become a private contractor for the household.

## 1.3 FINANCIAL MANAGEMENT AND ADMINISTRATION

### 1.3.1 Grant Award Payments

#### 1.3.1.1 *Payment Request*

Subrecipients will be funded in a timely manner to facilitate the purchase of approved materials and the recruiting or maintenance of qualified labor to weatherize homes. All subrecipient payment requests must be submitted with a requested amount, a written justification for the amount, the date, and signed by the authorized staff of the subrecipient.

#### 1.3.1.2 *Method of Payment*

KHRC shall use the advance / reimbursement methods of payment for costs incurred in providing weatherization services. A cash request for funds must be limited to the immediate cash needs of the recipient. An electronic transfer payment will be utilized unless the subrecipient requests otherwise. The WAP Program Manager, Division Deputy Director, or the Division Director can alter the requested amount, but such must include written justification, initialed, and dated.

#### 1.3.1.3 Advance Payments

After all required signatures are obtained on grant documents, and upon receipt of a request from the authorized staff of the subrecipient, advance payments may be remitted to the subrecipient. The basis for determining the amount follows:

- The cash requested by the subrecipient less the cash carryover on hand
- The date the first monthly production is to be scheduled

The cash advance is predicated on the first two or three months of production shown on subrecipients' monthly production schedule. In general, a maximum advance of twenty-five percent (25%) of the grant award may be made to a subrecipient. A larger advance may be approved with adequate justification regarding production requirements.

#### 1.3.1.4 Reimbursements

Reimbursements may be made for actual expenditures in accordance with the subrecipient production schedule except when a recipient indicates anticipated major expenditures for the following month on the monthly financial report. All anticipated major expenditures must be justified in the General Expenditure Report Comments box of the monthly report or in a separate cover letter with the monthly report. Criteria for determining reimbursements include, but are not limited to, the following considerations:

- Agency expenses
- Cash balance at agency and at State level
- Homes in progress
- Inventory balance
- Agency request negotiation with KHRC
- Combination of some or all of the above

#### 1.3.1.5 Delays in Payment

Subrecipients shall be notified by KHRC program staff if payments will be delayed or if they will be different from the amounts requested. These payments (exceptions) must include written justification, signed and dated by the WAP Manager, Division Deputy Director, or the Division Director. A delay in issuing a payment could result from:

- Inaccurate reports
- Untimely reports
- Unsigned reports
- Information submitted on the wrong report form
- Federal funds not available for drawdown or delay in receiving quarterly allocations. Payment is contingent on the date Federal funds are received and available to KHRC. If Federal funds are delayed, subrecipients shall be notified by KHRC.

#### 1.3.2 Leveraged Non-Federal funds

Funds from non-Federal sources which are used in weatherizing eligible homes are considered leveraged funds and should be reported as expended on individual projects and subsequent monthly reports to the State. Leveraged funds may include landlord or owner donations, volunteer labor, utility partner

programs, or contributions by other non-Federal sources. Non-Federal funds may be governed by separate grant agreements. See the section on [Financial Management and Administration](#) if applicable.

Community Development Block Grant, HOME grants, and direct HUD rehabilitation funds are not leveraged funds, as they derive from Federal sources. Insurance payments for covered damage are not leveraged funds, but are considered program income.

### 1.3.3 Program Income

Pursuant to OMB 2 CFR 200.80, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards program income is defined as gross income earned by the non-Federal entity that is generated directly by a supported activity or earned as a result of the award including, but not limited to, income from fees for services performed, the use or rental of real or personal property acquired under Federally funded projects, and the sale of commodities or items fabricated under an award. Property owner (i.e. landlord) contributions and leveraged resources (i.e. utility or State funds), sale of real property, equipment or supplies are NOT considered to be “program income” for the purposes of the Weatherization Assistance Program.

Program income shall be:

- Retained by the subrecipient
- Added to funds committed to the grant
- Used to further eligible program activities

Program income shall be reported to the appropriate grant as it is earned and as it is expended on monthly cash reconciliation reports. As per 2 CFR 200.305.5 Subrecipients shall disburse program income, rebates, refunds, contract settlements, audit recoveries, and interest earned on such funds before requesting additional cash payments. Any unexpended program income shall be considered grant carryover at the end of the program year.

### 1.3.4 Interest Income

Consistent with OMB 2 CFR 200.305,8-9, Uniform Administrative Requirements, Cost Principles, and Audit requirements for Federal Awards, grant recipients shall maintain advances of Federal funds in interest bearing accounts unless:

- The recipient receives less than \$120,000 in Federal awards per year
- The best reasonably available interest bearing account would not be expected to earn interest in excess of \$500 per year on Federal cash balances
- The depository would require an average or minimum balance so high that it would not be feasible within the expected Federal and non-Federal cash resources
- A foreign government or banking system prohibits or precludes interest bearing accounts

Interest earned amounts up to \$500 per year may be retained by the non-Federal entity for administrative expense. Amounts in excess of \$500 per year of interest earned on Federal advances deposited in interest bearing accounts shall be remitted annually to Department of Health and Human Services, Payment Management Systems as per the instructions in 2 CFR 200.305.

### 1.3.5 Average Cost Per Unit

The average cost per unit expenditure for labor, weatherization materials, and related matters (program support) for DOE shall not exceed the annually adjusted value set forth by DOE. This adjusted value can be found annually in the Weatherization Program Notice (WPN) ('Program Year'-1).

Average cost per unit is calculated by taking the sum of the budget categories; labor, material and program support divided by production. Please refer to the section on [Allowable Costs/ Budget Categories](#) for a detailed explanation of what cost are allowed in each budget category.

Budget Categories not included in the average cost per unit calculation include:

- Administration
- Health and Safety Liability Insurance (some exceptions apply, please see the [Liability Insurance Budget Categories](#) sections)
- Financial Audits
- Training and Technical Assistance (T&TA)

The average cost per unit for the LIEAP grant shall not exceed \$6,500 until further notice.

### 1.3.6 Audits

All weatherization subrecipients which expend in excess of \$750,000 from combined Federal sources on an annual basis are required to undergo an independent audit annually by a licensed, Certified Public Accountant (CPA). This requirement may be fulfilled by ensuring that the weatherization grants are included in the agency-wide audit.

Program funds will be audited annually in accordance with the following:

- Generally accepted accounting principles.
- 2 CFR 200 Subpart F, Audit Requirements.
- DOE 2 CFR 200 and 2 CFR 910
- All State and Federal laws and regulations governing the programs in which local agencies participate.

Costs of audits can be incorporated into annual contracts, charged to the subrecipient's "Audit" budget category. The audit must comply with 2 CFR 200 Subpart F for the cost to be charged to K-WAP.

The audit report shall contain:

- Statement that the audit was made in accordance with 2 CFR 200
- A report on financial conditions and schedules for Federal assistance which show the total expenditures for each Federal assistance program as identified in the Catalog of Federal Domestic Assistance. (CFDA) [NOTE: The CFDA for DOE is 81.042 and for LIEAP is 93.568.]
- Identification of the organization's significant internal accounting controls
- Identification of those controls designed to provide reasonable assurance that Federal programs are managed in compliance with applicable laws and regulations
- Identification of the internal controls that were evaluated, the controls that were not evaluated and the material weaknesses identified as a result of the evaluation.

- A Statement of positive assurance with respect to those items tested for compliance, including compliance with law and regulations pertaining to financial reports and claims for advance and reimbursement
- Negative assurance on those items not tested
- Summary of all instances of non-compliance
- Identification of total amounts questioned, if any, for each Federal assistance award as a result of non-compliance.
- Fraud, abuse, illegal acts, indications of such acts, including all questioned costs found as the result of these acts of which auditors become aware, should be covered in a separate written report. The subrecipient shall provide comments on the findings and recommendations in the report, which shall include a plan for corrective action taken or planned and comments on the status of corrective action on prior findings. NOTE: If corrective action is not necessary, a statement describing the reason it is not should accompany the audit report.

The audit report shall be ordinarily made available within thirty (30) days after the completion of the audit. All audit reports shall be retained on file by the subrecipient for three years from their issuance. K-WAP staff will review all audits for grant compliance.

The subrecipient must submit the audit to the Federal Audit Clearinghouse (FAC).

Program and fiscal staff of K-WAP will review and resolve any audit findings noted in subrecipients' annual independent audit in accordance with the time lines established by that office. DOE will review the audit when its staff monitors the State program.

When program or fiscal findings are identified, staff will initiate a demand for a corrective action plan within 30 days and staff will monitor the corrective action in future on-site visits. When fiscal findings require recoupment (e.g., ineligible home), K-WAP will initiate a demand for recoupment within 30 days and will track it through resolution. If a fiscal finding leads to a questioned cost which requires specialized audit review, K-WAP will contract an audit review within seven days and will follow the issue to resolution.

In cases of continued inability or unwillingness to provide an appropriate audit, K-WAP shall consider the following sanctions:

- Identification of total amounts questioned, if any, for each Federal assistance award as a result of non-compliance
- Withholding an appropriate amount of Federal assistance payments in accordance with prior year actual audit cost until the audit is completed satisfactorily
- Withholding or disallowing overhead costs.
- Suspending current grant award in operation until the audit is made

#### 1.4 ALLOWABLE COSTS/ BUDGET CATEGORIES

The Kansas Weatherization Assistance Program subrecipient agencies shall expend and report DOE and LIEAP funds for the following allowable cost categories:

### 1.4.1 Administration

The State of Kansas shall not exceed the ten percent maximum administrative allocation. KHRC shall not exceed the five percent maximum and the subrecipient agencies shall not exceed the remaining five percent administrative allocation. To ensure the compliance of the ten percent maximum Federal mandate, KHRC has written policies and procedures which require that K-WAP costs are monitored and maintained against the approved agency budget. All costs are reviewed and approved by the program director prior to authorization to expend funds. Subrecipient administrative costs are controlled by the approved budget and budget worksheet narrative, which is a part of the signed grant agreement. All administrative costs which are determined unallowable, as a result of a resolved agency or CPA audit, shall be recouped by KHRC or reimbursed to the weatherization program.

An exception applies to exceed the ten percent total administrative requirement shall apply to subrecipients funded at less than \$350,000 of DOE funds. This exception only applies to DOE awards. This is permitted only if KHRC has determined that such subrecipient requires the additional amount to effectively implement the administrative requirements of the Program. Subrecipient agencies are required to submit written justification for administrative funds in excess of five percent of the total grant, and receive KHRC approval based on the individual subrecipient needs.

The Weatherization Assistance Program legislation and regulations do not define the administrative cost categories. Any expenditure, allowable by Office of Management and Budget (OMB) cost principles, by a subrecipient in carrying out this program may be charged as administrative costs. However, certain costs in this program, by exclusion from other categories, can only be administrative.

DOE has identified instances where certain administrative functions could be charged to the program operations category because of the nature of the expense as it related to program operations (i.e., client intake, recordkeeping, salary/fringe of Program Managers and coordinators, telephone costs, etc.). Subrecipients are encouraged to utilize this flexibility where it is appropriate.

Subrecipient administration is considered to be unique to each organization. The organization shall define its administrative costs consistent with the generally-accepted accounting practices and procedures within the organization.

#### 1.4.1.1 Indirect Cost

Indirect costs are costs incurred for a common purpose, benefiting more than one program, and not readily allocable among individual programs based on their proportionate shares of benefits derived. A Federally approved indirect rate agreement is required if reimbursement of indirect benefits is requested.

Indirect costs can be included in subrecipient administration and will be considered an allowable cost provided there is a Federally approved indirect rate (s) or cost allocation plan. The rate/amount allowable does not invalidate the program budget category limits.

#### 1.4.1.2 Direct Costs

**Salaries and Wages:** Payments of a fixed compensation for agency administrative, financial, and accounting personnel, and any other employees performing administrative duties of the agency regardless of title. (See the salaries and wages section under [Program Support](#) for exceptions.)

Space, Utility, and Telephone: Payments made in accordance with approved budget and details narratives for positions are listed in direct salaries and wages.

Travel: Payments for mileage, per diem, and subsistence for positions listed in direct salaries and wages. All travel and subsistence payments shall be made in accordance with the guidelines in 2 CFR 200 as well as the agencies own policies and procedures that are applied uniformly across the organization.

Copier, Postage and Computer Costs: Payments shall be made in accordance with appropriate cost allocation plan or approved indirect costs for positions listed above. Computer costs may include, but are not limited to, on-line services, computer supplies and maintenance agreements.

Other Costs: Payments made for other costs of positions in direct salaries and wages which benefit the weatherization program. Other costs are those not included in the material or program support budget line items that are direct program costs.

#### *1.4.1.3 Audit Costs*

DOE allows audit costs as a separate, non-administration line. The DOE grant is currently the only grant that allows audit costs to be separated.

### **1.4.2 Program Operations**

Per 10 CFR 440.18, costs incurred for program operations are generally defined as the direct costs necessary to affect the weatherization of an eligible dwelling unit but not included in the material costs. While some of these categories could be charged as allowable administrative or T&TA costs – depending on the nature of the expense – they are almost always part of the ACPU calculation.

Many of these costs cannot be directly related to a specific dwelling unit – like vehicle and equipment maintenance or purchases of tools and equipment. When incurred, these total costs are amortized over the number of dwelling units completed during the contract period. For example, the cost of a blower door (\$4,500) could be amortized over the 150 homes completed during a contract period, resulting in a \$30 increase in the ACPU for the homes completed in that time frame.

Program operations is broken down into the following categories:

#### *1.4.2.1 Weatherization Materials*

All weatherization materials must meet the latest standards for weatherization as published in 10 CFR 440, revised Appendix A or subsequent ASTM, ANSI, or FS approved standards which supersede an individual standard. Materials listed in 10 CFR 440, revised Appendix A, and identified as cost effective by the accepted program energy audit procedure are allowable material costs. Weatherization agencies must obtain and keep current Material Safety Data Sheets (MSDS) for each inventoried material item purchased. Under Kansas Statute [KSA 79-3606 (OO)] weatherization materials purchased directly by a weatherization subrecipient agency is tax exempt, and State sales taxes may not be included in the purchase price of such materials.

Allowable material costs include:

- Materials listed in Appendix A or as approved in the energy audit protocol.

- The cost of incidental repair materials; that is, repair materials needed to protect or aid in the installation of weatherization materials as defined in 10CFR 440. See the section on [Incidental Repair Measure](#).
- The cost of purchase and delivery of materials; the cost of freight to deliver weatherization materials is an allowable materials cost
- The cost of transportation to a storage site and to the site of the weatherization work
- The required fees related to building permits from local governments are allowable under this category.

NOTE: Weatherization is a non-construction program therefore no construction of buildings or acquisition of real estate can be charged to this grant. Improvements to a property that are not in direct relation to carrying out Weatherization-specific tasks may not be considered allowable under this grant (e.g., paving a parking lot of the storage area is not considered allowable however retrofitting a storage facility with appropriate shelving to accommodate supplies would be deemed allowable).

#### 1.4.2.2 Labor

K-WAP shall authorize payments for only those items below and as approved in the subrecipients' budget and detailed budget narrative. Labor category expenditures are limited to those defined in 10 CFR 440.19.

Payments to employ labor or engage contractors including:

- Payments to subcontractors when contracts are issued in accordance with all appropriate Federal and State procurement and contracting rules and regulations. Under K.S.A. 79-3603 (p) [as amended by SB 493; Notice 98-02, Effective Date: 07/01/98], subcontract labor is not taxable.
- Salaries and fringe benefits of crew members
- Salaries and fringe benefits of crew leaders

Costs incurred for transporting materials, tools, equipment and work crews to the site of weatherization work are allowable direct labor costs. Load time and travel logs shall be supported by mileage logs and/or time sheets.

Because T&TA funds are limited, Subrecipient may charge the cost of training to the T&TA category and the employee's time for participation in the event under the labor category.

Note: Labor costs associated with the Weatherization Assistance Program DOE and LIEAP are not subject to Davis-Bacon prevailing wage requirements.

#### 1.4.2.3 Program Support

K-WAP shall authorize payments for only those items listed below and in accordance with the approved budget and detailed narratives submitted by the subrecipient agency. Program support category costs exclude the labor category in an indirect cost rate or cost allocation plan.

Direct cost includes:

- Employment of personnel directly related to the operation of the Program:

- This category is defined for general consistency purposes such as weatherization coordinators' salary and fringe benefits spent in actual supervision of labor, client intake, recordkeeping, etc.
- Salaries and fringe benefits of auditors/assessors, quality control inspectors, field supervisors who are not installing materials, and warehouse personnel, such as inventory clerks, who are engaged in handling materials.
- Storage of weatherization materials, tools, equipment, and weatherization vehicles.
  - Space rental. As with vehicles and equipment, neither Grantees nor Subrecipients may pre-pay leases that exceed the end of the grant period.
  - Utility costs at storage only, i.e., heat, lights, and water.
  - Retrofitting storage facility.

Cost incurred for transporting auditors, inspectors, supervisors and other support staff personnel as required for the program.

Salaries and wages including fringe benefits for program support staff, may be charged for the portion of time related to program support activities, except when the position is included in an indirect cost rate or cost allocation plan which identifies the position as administrative. If the position's duties are less than 100 percent weatherization program support related, time study records or timesheets must be maintained to support the charges.

Auditors, Inspectors, on-site supervisors, and clerical support related to program support activities are generally positions which perform program support functions. If any agency position is classified as an administrative position and is not a part of an indirect cost pool and performs program support activities, the time performing those activities may be charged as a direct cost to program support. Detailed time records shall be maintained and will be reviewed by monitors and auditors of the weatherization program.

Space, Utilities, and Telephone Supplies: Payments shall be made for the costs associated with approved program support positions. Costs are to be allocated in accordance with a cost allocation basis as identified in 2 CFR 200.

Vehicles and Equipment: Maintenance, operation, and insurance of vehicles used to transport weatherization materials or workers. Maintenance of tools and equipment. Please also see [Vehicles and Equipment](#) \$5,000 or more – optional category.

Purchase or annual lease of tools, equipment, and vehicles. NOTE: All vehicle purchases shall receive prior KHRC and/or Federal approval; any equipment \$5,000 or more shall also receive prior KHRC and/or Federal approval. Subrecipients may not prepay leases that exceed the end of the grant period.

The cost of required bonding coverage.

#### 1.4.3 Health and Safety

The cost of materials and labor to abate health and safety hazards before, or because of, installation of weatherization materials or to comply with the Kansas Health and Safety Plan are allowable charges. The health and safety cost category should include materials and labor, not training related to the implementation of health and safety.

Health and Safety expenditures and measures are not required to be cost-justified by the energy audit.

Average H&S cost per unit and maximum H&S budget expenditure shall be aligned with the annual Health and Safety Plan in the State Plan.

See the [Health and Safety Requirements](#) section for specific allowable charges.

Health and Safety costs are budgeted as a separate category and, thereby, such costs are excluded from the average per-unit cost calculation. This separate category also allows these costs to be isolated from energy efficiency costs in program evaluations.

#### 1.4.4 Vehicles and Equipment \$5,000 or more – Optional Category

In 2001, as an option, DOE created the Vehicles and Equipment budget category to allow Subrecipient amortization of vehicle and equipment costs over multiple years. This can be particularly useful to small Subrecipients that do not have alternative funding sources and are unable to balance their production and average cost per home requirements when absorbing the vehicle or equipment costs over a single year. Alternatively, vehicles and equipment may be expensed as a component of the Program Support budget category.

#### 1.4.5 Liability Insurance

Subrecipients must be covered by liability insurance. Liability insurance refers to the general contractor, or other policies that provide protection in case of personal injury or property damage resulting from the weatherization services. K-WAP recommends a minimum of \$300,000 for property and \$500,000 for personal injury. Subcontractors must provide their own coverage.

Liability insurance can be charged to the liability line item in the budget, which was created to ensure that such costs would not have to be charged to the administrative cost category. This provision was established to cover general agency liability insurance and does not include any vehicle related insurance. See preamble to the Federal Register Notice, 45Fed. Reg. 13028, 13031, Feb. 27, 1980. However, if liability insurance is not separated out into its own budget category or is passed on through private contractors through their service delivery requirements it is part of the Average Cost Per Unit (ACPU) calculation.

Most, if not all, regular liability insurance policies do not provide for many health and safety measures such as lead and other pollution occurrence items. K-WAP recommends POI as part of or an addendum to general liability insurance. If Subrecipients choose NOT to obtain POI coverage and damage occurs or there is disturbance to any other environmental pollutants, the cost of remediation, clean up, relocation, medical expenses, or any other resulting costs may not be charged to Weatherization and must be covered by another funding source. Documentation of the subcontractor's that subrecipients are electing to provide POI for must be provided annually. These costs are also charged on the liability insurance line item.

Vehicle Liability insurance should go under program support, NOT the LIABILITY INSURANCE category.

#### 1.4.6 Financial Audits

Audit costs are allowable as a separate, non-administration expense in the DOE grant. These costs are included in administrative cost for other grants. The cost of audits which are made in accordance with the provisions of 2 CFR 200 Subpart F, as applicable, are allowable charges to DOE and other Federal

assistance programs. These charges may be considered a direct cost or an allocated indirect cost. Audit procurement must be in compliance with applicable OMB Circulars. The percentage of costs charged to Federal assistance programs for a single audit shall not exceed the percentage represented by Federal funds expended to total funds expended by the subrecipient during the fiscal year. Exception: The percentage for a program may be exceeded if appropriate documentation demonstrates higher actual costs to meet program specific audit requirements. Refer to 10 CFR 440.23 (d).

#### 1.4.7 Training and Technical Assistance (T&TA) Costs

Allowable T&TA costs include:

- Staff salaries while attending training, monitoring, providing training, traveling to and from training, and participating in on-the-job training
- Subrecipient costs (participation, travel, logistics) to attend approved T&TA activities
- Equipment and materials related to training may also be purchased with these funds
- Training contractors participating in the program provided a retention agreement is obtained
- Cost of providing T&TA to other agencies as approved by KHRC
- Providing information concerning conservation practices to occupants of eligible dwelling units (client education)
- Evaluation of program outcomes

### 1.5 PROPERTY STANDARDS

Equipment is defined as any article of tangible, non-expendable personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit. This would include vehicles and tools.

Materials and Supplies are defined as all tangible personal property other than those described in Equipment. A computing device is a supply if the acquisition cost is less than the lesser of the capitalization level established by the subrecipient for financial Statement purposes or \$5,000, regardless of the length of its useful life.

#### 1.5.1 Purchases

##### 1.5.1.1 Equipment

All subrecipient equipment purchases are subject to competitive bidding and require prior approval by KHRC (and the Department of Energy if DOE funds are used), regardless if purchased with Federal funds or program income. Failure to follow these procedures may result in disallowances of these costs.

All requests for prior approval must be submitted in writing to KHRC by submitting a Purchase Request Form, available here <http://www.kshousingcorp.org/more-program-information.aspx>, and shall include:

- Brief narrative and detailed description of equipment
- Cost and cost analysis
- Copies of invitations for bids and responses
- Justification for purchase (purpose and benefits for weatherization program)
- Authorization for equipment disposal, if applicable (see disposition)

Note: All bid specifications must be generic enough to encourage competitive participation. They cannot be manufacturer or brand name specific nor can they include only options or combinations of options available from only one manufacturer or dealer. In keeping with the WAP mission of conserving energy, subrecipients are strongly encouraged to purchase alternative fueled vehicles.

All titled weatherization equipment purchased with weatherization funds shall be titled to the weatherization subrecipient agency. Kansas Housing Resources Corporation is to be shown as the first lien holder on all titles. Titles will be conditional based on the following conditions:

- Use the equipment for the authorized purposes of the project during the period of performance, or until the property is no longer needed for the purposes of the project.
- Not encumber the property without approval of the Federal awarding agency or pass-through entity.
- Use and dispose of the property in accordance with 2 CFR 200 and guidelines set forth in this manual.

Copies of the Title and Registration Receipt shall be sent to KHRC as soon as the new equipment is titled and registered.

#### 1.5.2 Insurance

Any vehicle purchased or leased with weatherization funds shall carry at least the minimum amount of liability insurance as required by State statute and complete physical damage coverage to protect the investment of the vehicles aged five years or newer.

#### 1.5.3 Inventory

Subrecipients must establish a written inventory policy that includes control systems to prevent loss, damage, or theft of equipment, materials, and supplies.

##### 1.5.3.1 Equipment

Property records must be maintained for equipment that include a description of the property, a serial number or other identification number, the source of funding for the property (including the FAIN), who holds title, the acquisition date, and cost of the property, percentage of Federal participation in the project costs for the Federal award under which the property was acquired, the location, use and condition of the property, and any ultimate disposition data including the date of disposal and sale price of the property.

Subrecipients are required to perform inventory checks at least annually.

An updated equipment inventory must be exported and submitted to KHRC at the beginning of the annual budget period each year.

A mileage log and service maintenance log must be maintained by the subrecipient for each vehicle purchased with WAP funds or program income. Mileage to be paid for with WAP funds must be supported with a mileage log.

A daily usage system must be a central feature of the inventory system that makes it possible to track materials used on an individual home back to the point of purchase.

Theft of WAP purchased tools and equipment along with any accidents with WAP purchased vehicles must be reported to the proper authorities. A copy of the applicable report must be given to the KHRC fiscal representative along with all necessary insurance information.

#### 1.5.3.2 *Materials*

All materials received must be accounted for by invoices from contractors which describe the material(s), number of units, unit cost, total costs, shipping charges, if any, and sales tax.

Subrecipients shall report the value of materials issued for completed projects during the reporting month.

### 1.5.4 **Disposition**

#### 1.5.4.1 *Equipment*

Items of equipment with a current per unit fair market value of \$5,000 or less may be retained, sold or otherwise disposed of with no further obligation to the Federal awarding agency. KHRC must still be notified.

If a subrecipient has no need for property purchased with weatherization funds, with a fair market value (per item) price of \$5000 or more, the subrecipient must do both of the following:

- Submit an Property Disposition Request and Report to KHRC prior to disposition of the item. The report is available here: <http://www.kshousingcorp.org/more-program-information.aspx>
- Offer the property to local agencies with weatherization programs.

Equipment will be given to local agencies on a first come, first served basis.

If no local agencies want the equipment, KHRC will provide disposition instructions (with Federal approval).

Proceeds from sale of real property, equipment, or supplies are not program income, and would not be reported as such. However, proceeds shall be retained by the subrecipient and used to further weatherization program activities.

#### 1.5.4.2 *Supplies*

Title to supplies will vest in the non-Federal entity upon acquisition. If there is a residual inventory of unused supplies exceeding \$5,000 in total aggregate value upon termination or completion of the project or program and the supplies are not needed for any other Federal award, the non-Federal entity must retain the supplies for use on other activities or sell them, but must, in either case, compensate the Federal government for its share. The amount of compensation must be computed in the same manner as for equipment.

## 1.6 **PROCUREMENT**

The objective of the procurement process is to obtain needed services, goods and materials at the lowest possible price, in a fair and open manner, without compromising quality or production.

Subrecipients shall submit their written procedures and forms for contracting and procurement to the State for approval prior to implementing them. Standards must reference Federal regulations. KHRC reserves the right to require a copy of the bid packages for its review and approval. Subrecipients shall

request written authorization from the State to use a “sole source” bid and maintain file documentation. The State shall review and approve or deny use of a sole bidder to the Subrecipients. Sole source bids for DOE weatherization require DOE’s prior approval when they exceed \$25,000. Subrecipients are required to include the specifications which must be met or exceeded in bid packages and contracts for weatherization materials. To the maximum extent practicable, Subrecipients are required to procure goods and services at competitive prices. Acceptance of cost plus pricing shall result in disallowed costs and be recouped.

Grantor’s prior approval for purchasing equipment shall be required in accordance with applicable unit cost thresholds for nonprofit organizations, institutions of higher education, and units of local government. Title shall remain with the Subrecipients; however, K-WAP and the Federal agency reserve the right for title transfer of items with a unit acquisition cost of \$5,000. At a minimum, procurement procedures shall comply with U.S. Financial Assistance Rules, 2 CFR 200.

#### 1.6.1 Debarred Contractors

While several factors should be considered to determine if a contractor is “responsible” (such as, but not limited to, work history, references, and capacity to do the work) the subrecipient must also assure that the award is not made to a contractor appearing on a Federal list barring them from being awarded public money. Subcontractors appearing on the Federal debarment lists are also prohibited from doing work. The Federal debarment list should be checked online before using and annually as follows:

Federal: [www.sam.gov](http://www.sam.gov)

Advantageous to the recipient, price, quality and other factors considered. Solicitations shall clearly set forth all requirements that the bidder or offeror shall fulfill in order for the bid or offer to be evaluated by the recipient. Any and all bids or offers may be rejected when it is in the recipient's interest to do so.

#### 1.6.2 Subcontractor Agreements

Subcontractor agreements must contain, at minimum, the following:

- Beginning date of each annual budget period;
- Ending date of each annual budget period;
- Total amount and method of compensation and compensation method;
- List of materials, number of items/units, and/or description of services;
- Cost of each material, item/unit, and/or service being supplied; and,
- All other terms and conditions required by State and Federal laws including 2 CFR 200 Appendix II,
- All subcontractor agreements must be signed by an authorized subrecipient representative on behalf of the agency and signed by the subcontractor. Scanned originals or digital signatures are acceptable.

#### 1.6.3 Procurement Documentation

Adequate documentation of actions taken in connection with each method of procurement is required as follows:

For written quotations (fax quotations must be followed up with a signed original), the contractor must provide at least the following information: name and address of the contractor, date of the quotation,

description of the item or details of the service to be provided, price quoted, and name of contact. (Written quotations must be placed in the subrecipient's files.)

When a request for proposals (RFP) is used, the minimum acceptable documentation must include:

- A copy of the RFP that was issued;
- A Statement of how firms solicited were identified;
- A list of firms solicited;
- A copy of any newspaper advertisements used;
- Each proposal that was received;
- The written criteria for evaluation of the proposals; and,
- Documentation of evaluation of the proposals.

## 1.7 REPORTING REQUIREMENTS

Weatherization subrecipients shall report monthly financial and program data to KHRC. Complete and accurate reports must be submitted by the tenth day of each month or the first working day thereafter if the tenth day falls on a weekend or holiday. Statewide implementation of the Hancock One Software enables the Subrecipient to obtain all the information needed. On a monthly basis, subrecipients must submit the following to the K-WAP for all active grants:

- Monthly Invoice (titled Request for Payment and Statistical Report), emailed or mailed
  - Signatures not required on the invoice
- Signed Monthly Cash Reconciliation Report, emailed for mailed
  - Signatures required. All signature lines must be signed by an authorized signer.

Additional reporting and information may be required as requested by KHRC throughout the year. Examples of such reporting include:

- Equipment inventory (vehicles, equipment)
- NASCSP funding survey, annually upon request
- Production Updates (number of homes and expenditures in progress)
- Application tracker, upon request
- SHPO Report, annually upon request
- LIEAP Performance Measures Tracker, upon request, annually

Reports submitted which contain substantial errors or insufficient information shall be returned to the agency for corrections. K-WAP will make only minor handwritten corrections on reports.

All accounts payable must be liquidated prior to the submission of the final report. While new expenditures may not be incurred after the grant award expiration date, grant files will not be considered closed officially until the final resolution of the CPA or KHRC audit. KHRC will provide a closeout report within 180 days after the grant ending date.

## 1.7.1 Hancock One Software

### 1.7.1.1 Client List

All weatherization applications received, whether complete or not, shall be entered into the Hancock client list. The client list shall be maintained to reflect the current waiting list and client eligibility and status.

### 1.7.1.2 Deferred Clients/Jobs

All deferred weatherization applications and jobs shall be entered into the Hancock system and the corresponding deferral reason selected from the available options.

### 1.7.1.3 Dual Funding Homes

Dual funding of homes is allowed, and may even be required by certain grants, as long as the project qualifies for each individual grant. Dual funding is an effective way to manage each grant's average cost per home. When homes are dual funded, they will be reported in Hancock as one project but each measure will be identified by funding source. Certain grants may require a brief narrative of work performed in the measures list section.

When dual funding homes, each grant shall have at a minimum one energy conservation measure recorded. Exceptions to this rule exist for specialty grants, i.e. KS17, etc.

### 1.7.1.4 Completed Homes Records

Subrecipients are required to maintain records of all weatherized homes, to prevent the possibility of inadvertently re-weatherizing a house. These records should contain street addresses and/or geographic coordinates if necessary. Cross-indexing would be appropriate by name, address (street or rural) and by county. A final inspection date and total cost must also be a part of the record. The Hancock reporting system maintains information on all completed homes to assure homes weatherized after September 30, 1994 are not re-weatherized.

### 1.7.1.5 Close Out Procedures

Closeout is done after the Program Year ends. All work being reported to a grant must be completed before the Program Year ends, but the closeout period allows subrecipients to report on expenditures. Subrecipients can submit up to three closeout reports to finalize expenditures. The first closeout report must be submitted by the tenth day of the month following the last regular monthly report, or the first working day thereafter if the tenth day falls on a weekend or holiday. If necessary, the second closeout report must be submitted 2 weeks after the first closeout report. Subsequently, the third closeout report, if necessary, must be submitted 2 weeks after the second closeout report.

Close out reports include:

- A finalized Monthly Invoice
- A finalized Cash Reconciliation Report

## 1.7.2 Special Status Reports

In accordance with weatherization grant document, Attachment 2, Federal Assistance Reporting Checklist, KHRC is required to report to DOE the below items. By extension Subrecipients are required to report the below items to KHRC within 5 calendar days.

- Refusal of a Subrecipient to accept flow down requirements in the Special Terms and Conditions and/or any Attachment to the EERE Award
- Potential or actual violations of federal, state, and municipal laws arising out of or relating to work under the Award
- Any improper claims or excess payments arising out of or relating to work under the Award
- Potential or actual noncompliance with EERE or DOE reporting requirements under the Award
- Potential or actual violations of the lobbying restrictions in the Award
- Potential or actual bankruptcy/insolvency of the Grantee or a Subrecipient
- Potential or actual violation of U.S. export control laws and regulations arising out of or relating to the work under the Award
- Any fatality or injuries requiring hospitalization arising out of or relating to work under the Award
- Potential or actual violations of environmental, health, or safety laws and regulations
- Any event which is anticipated to cause a significant slippage or cost increase
- Any damage to Government-owned equipment in excess of \$25,000.
- Any incident arising out of or relating to work under the Award that has the potential for high visibility in the media.

### 1.7.3 Grantee Reporting Requirements

In accordance with 10 CFR 440.24, 2 CFR 200.333 and any further requirements, the State will keep such records as the Federal funding source requires, including records which fully disclose the amount and disposition by the State and each subrecipient of the funds received, the total cost of a weatherization project or the total expenditure to implement the State plan for which assistance was given or used, the source and amount of funds for such project or program supplied by other sources, and such other records as the Federal funding source deems necessary for an effective audit and performance evaluation.

## 1.8 MONITORING BY STATE

In accordance with 10 CFR 440, K-WAP has the responsibility to perform monitoring and oversight of the program implementation and work performed by all subrecipients. This responsibility includes ensuring that grant funds are expended in accordance with applicable law, including regulations contained in 10 CFR 440; applicable OMB circulars; DOE Financial Assistance Rule 2 CFR 200 and 2 CFR 910; Weatherization Program Notices (WPN's), and other procedures that DOE may issue. Monitoring will assure weatherization programs are being managed within Federal and State guidelines and that eligible low-income families are receiving high-quality and appropriate weatherization of their homes.

To fulfill this requirement KHRC will conduct comprehensive monitoring of each subrecipient at least once a year as identified in the State plan utilizing the approach below.

Risk assessments of each agency will be conducted annually by KHRC. A monitoring plan will be developed based on the results of this information, but will include at a minimum:

### A. Approach:

## 1. Programmatic and Management Monitoring

- a. K-WAP staff will conduct a programmatic and management review during annual one to two-day on-site compliance monitoring visits utilizing the Programmatic and Management Compliance Monitoring Instrument found in the WAP Subrecipient Procedure Manual. Monitoring will be completed by the Weatherization Program Manager or Field Specialist.
- b. Training and Technical Assistance will be provided as identified as needed or as requested during this monitoring visit.

## 2. Subrecipient Production Monitoring

- a. Subrecipient and home inspection monitoring will be conducted during one- to four-day on-site visits by the Weatherization Field Specialist or Program Manager. All grantee field monitoring will be performed by a certified Quality Control Inspector (QCI). For larger agencies several visits may be needed. K-WAP will inspect a minimum of ten percent of completed homes, filling out a Home Inspection Monitoring Instrument (see WAP Subrecipient Procedure Manual) for all homes inspected. Monitoring forms will certify that all work met the required standards and will be signed by the QCI. A signed and dated form stating the above will be made part of the permanent client file. In progress units will be monitored as available.
- b. The effectiveness, safety, workmanship, overall appearance, and compliance with field standards will be evaluated during the monitoring visit.
- c. Dwelling units inspected will be selected from a list of reported projects that will allow a comprehensive sample.
- d. Inspection visits may focus on problem areas identified in previous monitoring reports to ensure that problems have been corrected.
- e. Units which demonstrate satisfactory completion of weatherization measures and compliance with the SWS specifications will be identified as "Pass" units; those units in which weatherization measures were completed but could have benefitted by "Best Practices" or other recommendations will be identified as "Pass with Comments" and T&TA or suggestions for the future will be made. Units on which weatherization measures either were not completed, were completed unsatisfactorily, or not in compliance with the SWS specifications will be identified as "Rework" units. If significant deficiencies are discovered, such as health and safety violations, poor quality installation of materials, or major measures missed, the Subrecipient will be required to take appropriate corrective action to resolve the outstanding issues in a timely manner. As a general rule, no additional DOE WAP funds can be charged for "Reworks" on homes that have already been reported to DOE as completed, weatherized units. "Reworks" identified on units that are reported as completed to DOE will be addressed on a case by case basis in accordance with WPN 11-3. Corrective action may

require the removal of that unit from submitted reports or the use of non-DOE funds to correct the issue.

- f. Issues not resolved may result in K-WAP's recoupment of funds invested in the "Rework" units.
- g. Agencies receiving a high number of "Reworks" will be monitored more frequently and will have a higher percentage of homes examined until the Grantee can be assured that all deficiencies are resolved. Once procedures are in place to prevent reoccurrences, typical monitoring will resume.
- h. Contractors found to be repeatedly failing to perform adequately may be disqualified from future work if additional worker training fails to correct issues and concerns. Subrecipients will first contact underperforming contractors by telephone to try to resolve concerns. If concerns continue, the Subrecipient will initiate a written request for corrective action. Persistent concerns or deviations from specified requirements may result in withheld payments, contract probation, or contract termination.
- i. Training and Technical Assistance will be provided as identified as needed or as requested during this monitoring visit.

### 3. Financial Monitoring

- a. K-WAP staff will conduct a fiscal review during annual two- to three-day on-site compliance monitoring visits by the Deputy Division Manager/ Fiscal Monitor, utilizing the Fiscal Monitoring Tool and the accompanying Fiscal Monitoring Guide.
- b. Sensitive or significant noncompliance findings, such as waste, fraud, or abuse will be reported to DOE immediately.
- c. Issues not resolved may result in disciplinary action, including recoupment of disallowed costs, grant probation, or grant termination. See section: High Risk Status.
- d. Training and Technical Assistance will be provided as identified as needed or as requested during this monitoring visit.

### 4. K-WAP staff will review monthly financial and production reports for each agency.

- a. If irregularities or deviations from planned activities are found, K-WAP staff will contact Subrecipient agency staff for an explanation or correction. This contact will usually be by telephone first; if not resolved by telephone, K-WAP will initiate a written request for action.
- b. If irregularities or deviations occur over several months, K-WAP may withhold payments until they are corrected. Long-term irregularities or deviations from planned activities may result in grant probation and grant termination. See: High Risk Status.

- c. Sensitive or significant noncompliance findings, such as waste, fraud, or abuse will be reported to DOE immediately.
  5. K-WAP staff will review the latest financial audit of agency financial activities by the close of the program year.
    - a. If the reports note program findings, K-WAP will require responses and, if appropriate, corrective action.
    - b. Depending on the severity of any problems reported, a Subrecipient may receive a follow-up monitoring review, concentrating on prior deficiencies and required corrective actions.
    - c. Issues not resolved in a timely manner may result in recoupment of disallowed costs, grant probation, and grant termination. See: High Risk Status
    - d. Sensitive or significant noncompliance findings, such as waste, fraud, or abuse will be reported to DOE immediately.
- B. Exemplary Agencies.** Previous guidance suspended the designation of “Exemplary” Subrecipients so this status will not be utilized.
- C. Visit:** Monitoring visits will be scheduled at the convenience of KHRC and the Subrecipient through written correspondence. After the monitoring review is complete, the monitor will brief the Subrecipient, usually through an exit briefing, on the observations and monitoring assessments generated by the monitoring visit. Any issues that present imminent danger to people will be discussed and must be resolved immediately.

Sensitive or significant noncompliance findings, such as waste, fraud, or abuse will be reported to DOE immediately.

Within 30 days after each visit, a written report will be prepared for the Subrecipient that describes the current monitoring assessment (identifying any findings, concerns, recommendations, commendations, and best practices) and any corrective actions, if applicable. The Subrecipient has the right to respond in writing and present additional supporting documentation, clarification, and information as to why a particular finding(s) should be waived. If necessary, the Subrecipient will have 35 calendar days to respond with an acceptable corrective action plan.

Subrecipient noncompliance or repeated unresolved findings may result in disciplinary action, including recoupment of disallowed costs, grant probation, or grant terminations. See: High Risk. Noncompliance and unresolved findings will be reported to the DOE Project Officer.

- D. Tracking and Analysis.** Tracking and analysis of monitoring visiting will be conducted to ensure resolution and improvement. All corrective action items will be tracked to completion and will conclude with a close out letter.

Annually, K-WAP staff will summarize each of its Subrecipients' reviews and monitoring reports to identify each Subrecipient's needs, strengths, and weaknesses. The results of this monitoring analysis will be considered during annual planning and assessment of T&TA needs. An annual risk assessment of each Subrecipient will also be included with the analysis.

- E. Reporting.** A narrative report including successes and significant problems will be reported to DOE in the *T&TA, Monitoring, and Leveraging Report*. This report will include at a minimum: the Subrecipients monitored, and major findings (waste, fraud, and abuse) and resolutions, trends with respect to findings, concerns, or other issues, needed T&TA, Subrecipients that are considered high risk and a corrective action plan, and outcome activities involving T&TA and monitoring training.

#### 1.8.1 K-WAP Evaluation System for Findings

Any of the following criteria generally constitutes a finding. Findings may result in the requirement of additional training for the subrecipient personnel and/or the recoupment of disallowed costs.

- Fiscal element that does not comply with internal control standards, Federal or State Statute or Regulation to an extent to cause a concern either due to materiality in monetary volume or risk.
- The health and safety of clients, subrecipient staff, and subrecipient subcontractors, or the integrity of the building structure is threatened by work completed with weatherization funds.
- A health or safety problem is created by, exacerbated by, or not corrected by the delivery of K-WAP services.
- The omission of a required measure or technique with major energy savings potential, as determined by REM Design Improvement Analysis or a required procedure that addresses health and safety concerns.
- Poor quality of work that significantly affects the performance of measure or repairs
- Expenditure of K-WAP funds on measures that are not approved under K-WAP or required for health or safety reasons.
- Expenditure of funds on measures that do not yield an acceptable savings-to-investments ratio as determined by REM Design.
- Expenditure of K-WAP funds on measures that were not actually completed.
- Numerous change orders or reworks.

#### 1.8.2 High Risk Status

A Subrecipient may be considered "high-risk" if KHRC determines that a subrecipient:

- Has a history of unsatisfactory performance;
- Has ongoing performance issues;
- Is not following the Subrecipient Procedures Manual and /or Kansas SWS Field Guide
- Is not financially stable;
- Has a management system which does not meet program guidelines;
- Has not conformed to terms or conditions of previous awards;
- Has not demonstrated responsible behavior
- Has otherwise caused KHRC reasonable concern.

If KHRC awards a subrecipient identified as “high risk”, special conditions and/or restrictions may be a condition of the award. Special conditions or restrictions may include:

- Paying the subrecipient strictly on a reimbursement basis;
- Withholding authority to proceed to the next phase until receipt of evidence of acceptable performance within a given funding period;
- Requiring additional and/or more detailed financial reports;
- Initiating additional project monitoring;
- Requiring the subrecipient to obtain technical or management assistance;
- Establishing additional prior approvals.

If KHRC decides to impose such conditions, KHRC program staff will notify the subrecipient as early as possible, in writing, of the:

- Nature of the special conditions/restrictions;
- Reasons for imposing the special conditions/restrictions;
- Corrective actions which must be taken before the conditions/restrictions will be removed and the time allowed for completing the corrective actions; and
- Procedure for requesting reconsideration of the conditions/restrictions imposed.

Additional penalties that could occur if KHRC decides to impose conditions identified in the preceding sections:

- Delayed payments until concerns/issues are resolved
- Partial payments until concerns/issues are resolved
- Termination of the grant or contract

Written, 30-day prior notification will be provided by KHRC to the agency if any of these additional penalties are exercised.

### 1.8.3 Progression of Concern

During the normal execution of the weatherization program, should KHRC identify irregularities, deviations, or general concerns the following progression will serve as a general guideline of steps. Each situation will be assessed on a case by case basis and KHRC reserves the right, and may be required, to expedite or omit steps.

- Contact by phone or email.
- A formal written letter or request.
- Elevation to high risk. See section on High Risk.
- Removal of automatic grant renewal and request for proposals for a new service provider for the next program year.
- Immediate termination of the grant or contract.

### 1.8.4 Appeals and Dispute Resolution

Local agencies have the responsibility to resolve all client complaints, including applicant denials, project deferrals, and work quality issues. Local agencies shall establish in writing a clear, objective, and prompt appeals and dispute resolution process.

Local agencies must assure each client or applicant is aware of their right to file an appeal and the associated time restrictions. To certify that a client or applicant understands his/her rights, this information will be provided on the application and on all deferral or dispute correspondence. Local agencies will also be responsive to requests for information regarding the appeals and dispute resolution process. The client or applicant may withdraw a request for appeal if the agency review results in a negotiated settlement.

An appeal or grievance must be filed in writing for a subrecipient to take action, except when a client complaint can be resolved quickly. Prompt action and negotiations by the agency does not preclude the right to appeal. Local agencies must document each step of the appeals process including all communication with the client.

The subrecipient is encouraged to include a review of the decision by the weatherization director (if the weatherization director did not make the initial determination which is appealed) and at least the executive director of the agency.

If the appellant is dissatisfied with the decision of the subrecipient a request for appeal to the State must be submitted in writing to Kansas Weatherization Assistance Program staff within ten days of notice of action. Upon receipt of the request for appeal, State staff will copy the request for the agency whose decision has been appealed. The subrecipient will be requested to supply any documents relevant to the decision within seven days of receipt of the appeal by KHRC.

KHRC weatherization staff will review the request for appeal and any supporting documents and will respond in writing to the applicant or client within thirty days of receipt of the appeal.

If the appellant is dissatisfied with the decision of KHRC weatherization staff, he/she may appeal to the Director of Housing with Supporting Services (HWSS) of KHRC within ten days and may include additional documentation appropriate for review. The HWSS Director will respond in writing to the appellant within thirty days of receipt of the appeal.

If the appellant is dissatisfied with the decision of the HWSS Director, he/she may appeal to the Executive Director of the Kansas Housing Resources Corporation, within ten days of receipt of the decision of the Executive Director, and may include additional documentation appropriate for review. The Executive Director of the Kansas Housing Resources Corporation will respond in writing to the appellant within thirty days of receipt of the appeal.

The decision of the Executive Director of the Kansas Housing Resources Corporation is the final administrative remedy in the appeal process. If the appellant is dissatisfied with the final decision, he/she may seek remedy through the court system.

#### 1.8.5 Training and Technical Assistance (T&TA)

T&TA activities are intended to maintain or increase the efficiency, quality, and effectiveness of the Weatherization Program at all levels. Such activities will be designed to maximize energy savings, minimize production costs, improve program management and operational efficiencies, improve crew/contractor work quality, increase client satisfaction, and to reduce the potential for waste, fraud, abuse and mismanagement.

T&TA funding will be available for Grantee and Subrecipient use. Funds may be used to pay salary, travel, and operational and contractual costs for monitoring, obtaining and maintain certifications, training, training support, and providing or receiving programmatic and technical assistance. T&TA funds may also be used to train contractors participating in the program provided a retention agreement is obtained.

The K-WAP will use the following methods to provide T&TA:

- K-WAP staff will provide T&TA through onsite, written, and telephone communication with Subrecipient staff.
- Staff will provide specific T&TA on automated audit inspection procedures as a regular component of the on-site Programmatic and Management and production monitoring visits.
- K-WAP staff or contractor(s) will provide on-site or offsite T&TA as needed. Need may be identified by the Subrecipient staff, Grantee monitoring visits, QA review visits, DOE Project Officer monitoring visits, internal State audits, IG reports, or by K-WAP staff as the result of observation for resolution of problems, or to meet updates required by DOE.
- K-WAP and Subrecipient staff will participate in national activities as they are planned. K-WAP will assure staff are able to attend these meetings and will encourage Subrecipient staff to take advantage of training opportunities by funding Subrecipient attendance with T&TA funds available to the K-WAP.
- K-WAP management staff will attend DOE mandated activities/events, NASCSP events, State Weatherization Directors' meetings, national DOE sponsored conferences, and other staff development trainings as needed or required. Continuing education and conference attendance ensure Grantee effectiveness in administering and implementing the grant.
- Quarterly Weatherization Directors' Meetings will be scheduled to address areas of common concern with regard to training and policy for current initiatives and future program requirements. T&TA needs will be identified through feedback from the Subrecipients.
- Annual subrecipient closeout reports compare subrecipient production numbers, expenditures, average cost per unit expenses, and H&S expenses to statewide averages. Unusually high or low expenditures will receive further review and may identify additional T&TA needs.
- The K-WAP air sealing effectiveness is calculated using data provided from pre- and post-blower door measurements. This analysis provides K-WAP with information on each agency and weatherization auditor which allows staff to identify significantly high and/or significantly low performers. K-WAP staff analyzes the data for T&TA purposes that allows them to compare effectiveness within a Subrecipient's area and between Subrecipients. The need for additional T&TA may be identified through these comparisons.
- Kansas requires successful completion of its certification training for all auditors and inspectors. The State allocates T&TA funds to each Subrecipient for the trainings as needed. When a Subrecipient agency is unable to hire a certified weatherization auditor, the State will allow an on-boarding period, during which the new hire must complete his/her auditor certification requirements. See Auditor/Inspector Training and Certification. During the on-boarding period, all audits must be supervised by a certified weatherization auditor/inspector until training and certification requirements are met. Alternatively, an agency without a certified auditor/inspector may subcontract with a certified auditor/inspector. For current certified staff,

use of continuing education credits to maintain BPI certification will be funded through T&TA funds.

- Effectiveness of T&TA activities will be evaluated by formal evaluation forms completed by participants to Statewide training workshops, State monitoring staff’s observation and reporting of improvement in work standards and reporting, informal comments by workshop participants, agency directors, and others, and by disbursement of surveys to Subrecipients and contractors.
- Annual training is provided on a variety of topics for the K-WAP network. Training is mandatory as announced. Annual training typically includes fiscal and technical training and may include training tracks at the Annual Kansas Housing Conference. See the Annual State Plan for annual training activities.

### 1.9 RECORD RETENTION AND ACCESS

In accordance with 2 CRF 200, financial records, supporting documents, statistical records, and all other non-Federal entity records pertinent to a Federal award must be retained for a period of three (3) years from the date of submission of the final expenditure report or, for Federal awards that are renewed quarterly or annually, from the date of the submission of the quarterly or annual financial report, respectively, as reported to the Federal awarding agency or pass-through entity in the case of a subrecipient. Please see 2 CRF 200 for specific exceptions that may increase the length of time records must be retained. Please refer to agency specific record retention policies. KHRC will keep records for 5 years from final expenditure report.

The Federal awarding agency, Inspectors General, the Comptroller General of the United States, and the KHRC, or any of their authorized representatives, must have the right of access to any documents, papers, or other records of the non-Federal entity which are pertinent to the Federal award, in order to make audits, examinations, excerpts, and transcripts. The right also includes timely and reasonable access to the non-Federal entity’s personnel for the purpose of interview and discussion related to such documents. The rights of access as per 2 CFR 200.336 are not limited to the required retention period but last as long as the records are retained.

Historical Close-out Dates for Kansas Weatherization Grants:

<b>Grant</b>	<b>Date of final expenditure report</b>
2012 LIEAP	December 31, 2013
2013 LIEAP	December 31, 2014
2014 LIEAP	December 31, 2015
2015 LIEAP	December 31, 2016
2016 LIEAP	December 31, 2017
2017 LIEAP	Active award
2018 LIEAP	Active award
2008 DOE - R830002	March 16, 2012
DOE ARRA – DE-EE0000095	September 23, 2013

2009 - 2012 DOE DE-EE0000054	August 1, 2014
2013 - 2016 DOE- DE-EE0006155	Active award
2016-2019 DOE- DE-EE0007920	Active award
KGS	November 8, 2016
KS15	October 3, 2017
KS17	Active award
KCPL16	January 27, 2017
KCPL17	November 17, 2017
KCPL18	Active award
KCC16 and KCC16-2	December 31, 2017

## 2 PROGRAM GUIDANCE

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### 2.1 CLIENT INTAKE

#### 2.1.1 Client Intake

Clients will apply for the Weatherization Assistance Program directly to the Subrecipient providing the program in their service territory. Subrecipients shall have a written procedure in place to process applications and ensure eligibility.

Key steps in the process shall include:

- Entering the client into the Hancock system
- Ensure application completion. See [Client File Requirements](#)
- Ensure client income eligibility. See [Determining Client Income Eligibility](#)
- Confirm structure eligibility. See [Determining Building Eligibility](#)
- Notification of application receipt/status.

#### 2.1.2 Maintaining the Privacy of Recipients of Services

Transparency requirements placed on weatherization financial assistance programs shall be followed. Required information shall be provided to the requestor. However, KHRC and subrecipients must comply with all requirements on the Government to protect the privacy interests of individuals who participate in these financial assistance programs, as per 200.315. Personal identifying client information must be kept confidential and must not be made available to the public. Accessibility to client information must be limited to pertinent agency and program personnel.

#### 2.1.3 Delays in Providing Services

If an agency has a backlog in weatherization applications, clients shall be contacted by letter to advise them of the possible delay in receiving weatherization services. A copy of this letter will be placed in the client's folder. If waiting lists exist, pre-inspections by subrecipient agencies which exceed the total number of units to be weatherized in the current program year are conducted at the risk of the subrecipient agency.

### 2.2 ELIGIBLE CLIENTS AND DWELLINGS

#### 2.2.1 Weatherization Assistance Eligibility:

A dwelling unit shall be eligible for weatherization assistance if it is occupied by an income eligible family unit (see [Determining Client Income Eligibility](#)) AND the structure is eligible (see [Determining Building Eligibility](#)). Every dwelling weatherized must meet both the client eligibility and the structure eligibility requirements.

#### 2.2.2 Determining Client Income Eligibility

A client shall be eligible for weatherization assistance under this part if the occupant's income:

DOE and LIEAP Grants: Is at or below 200 percent of the poverty level as determined in accordance with criteria established by the Director of the Office of Management and Budget.

OTHER Grants: As identified in specific grant agreements.

Or, if the dwelling unit contains an occupant who has received cash assistance payments under Title IV or XVI of the Social Security Act or applicable State or local law during the twelve-month period preceding the determination of eligibility for weatherization assistance. Applicants receiving Supplemental Security Income (SSI) or Temporary Assistance to Needy Families (TANF) funds will automatically qualify for weatherization services for either the DOE or LIEAP grants. Applicants receiving LIEAP Utility Assistance from Kansas Department of Children and Families (KDCF) during the current program year will automatically qualify for weatherization services from the LIEAP weatherization grant. "During the 12-month period" is defined as having received within the twelve-month period, but not restricted to the entire period during that program year.

The applicant must provide evidence or income documentation satisfactory to the outreach worker that the household meets the eligibility requirements. The documentation must be maintained in the client file and made available for inspection by the agency employee and State staff. Applicant income must be verified or calculated for the one-year period prior to the certification month. Income data for a part of a year may be annualized in order to determine eligibility—for example, by multiplying by four the amount of income received during the most recent three months. A minimum of three months' income documentation must be available. If the household is determined to be ineligible based on the average income for three months, the applicant should be notified that 12 months of documentation may be provided to re-determine eligibility. Client income must be verified for the three-month period prior to the certification month or the twelve-month period if necessary. Applications on file for one year or more must be re-certified for the year prior to pre-inspection.

Definition of Income- Income shall be defined by the most recent DOE issued WPN in effect. Income guidance comes in WPNs labeled as WPN "year" - 3.

K-WAP has received clarification that when using a Social Security Benefit Letter to calculate income, the deduction for Medicare is not considered income. Use the net value after the Medicare deduction for the monthly benefit.

Tax forms may be used to verify income only if the certification period is from January through December; this generally means tax forms are not a useful source of income documentation.

For self-employed individuals, utilize a notarized statement declaring their income for the previous 12 months.

### 2.2.3 Client File Income Documentation Requirements

Client eligibility verification shall be documented in the client file in accordance with the most recent DOE WPN guidance and shall include, as a minimum:

- Which 3-month period was annualized to calculate the annual income, or which 12-month period was considered
- A list of all sources of client income for each household member, 19 years of age or older, who received income during the year prior to the certification month. Children 18 years of

age or younger, who have no income, do not have to provide sources of income nor a notarized statement of no income.

- Documentation of income from each source for the period(s) being considered
- The date and initials of the agency employee verifying the income
- Applicants who have undocumented or zero income must provide a notarized statement declaring their income, or lack thereof, for the previous 12 months.

#### 2.2.4 Eligibility Determined by Outside Agency/Program

If income eligibility is determined by an outside agency or program, i.e. LIEAP or HUD, any documentation used to determine eligibility, such as a copy of the LIEAP list or a copy of the DOE/HUD building list, will suffice as evidence of client eligibility. This documentation and any related documents must be retained in the client file.

Use of the annual LIEAP list provided by KDCF is allowed to determine eligibility for the LIEAP Weatherization Grant. The LIEAP list includes a date for the program year in which it may be used. In order to use the LIEAP list to show eligibility, the project must be completed and reported in the same Program Year as the issued LIEAP list.

DOE has posted three lists of properties supplied by HUD and USDA. Properties identified on these lists have been determined to meet certain eligibility criteria under WAP. The lists will allow reduced review and verification necessary to weatherize the identified buildings through WAP. The lists can be found at: <http://www.energy.gov/eere/wipo/housing-and-urban-development-multifamily-properties-eligible-weatherization-assistance>. The DOE/HUD list will no longer be updated and can't be utilized to qualify new properties after December 31, 2016.

#### 2.2.5 Approach to Tribal Organizations

In accordance with Federal rule, the State of Kansas recommends that tribal organizations be treated as local applicants eligible to submit an application to operate a Weatherization Assistance Program. Native Americans will receive assistance as eligible individual applicants under program guidelines.

#### 2.2.6 Qualified Aliens Eligibility

Subrecipients shall ensure that weatherization services shall only be provided to eligible populations. All client files will contain an Alien Certification form (see [www.kshousingcorp.org](http://www.kshousingcorp.org)).

All qualified aliens, continue to be eligible to receive assistance and services under the Weatherization Assistance Program if they meet other program requirements.

#### 2.2.7 Period of Eligibility

An applicant will remain eligible for weatherization services for 12 months from the date of verified eligibility.

If weatherization work is expected to begin after 12 months from the date of verified eligibility, the household must show continued eligibility.

Weatherization work begins on the date of initial energy audit.

### 2.2.8 Priority Groups

Among eligible clients there are program priorities which the Kansas Weatherization Assistance Program and the weatherization subrecipients observe. Priority is given to:

- Low-income elderly clients (age 60 or over)
- Low-income clients with disabilities (any individual who has a physical or mental disability which constitutes or results in a substantial handicap to the individual's employment; or a person who has a record of having, or is regarded as having, a physical or mental impairment which substantially limits one or more of the individual's major life activities; or someone who has a disability which would make the individual eligible to receive disability insurance benefits or supplemental security income from the Social Security Administration or developmentally disabled assistance from the Department of Health and Human Services)
- Low-income families with children 18 years of age or under

Emergencies may take precedence over all other priorities. Emergencies are defined as life-threatening housing conditions and shall be documented in the client file.

K-WAP is sensitive to the issues of high-energy burden and high residential fuel usage. KHRC is working with other agencies to establish these categories for use in identifying priorities. Until a uniform standard is developed, high energy burden and high energy users will not be a priority for eligibility.

Local agencies are required to serve their entire geographic area. Each county shall receive, at a minimum, service once every two years. Agencies are required to base service distribution on low income population density and need to the fullest extent possible.

### 2.2.9 Outreach to Eligible Clients

Local agencies may use a variety of outreach methods, including:

- Informing organizations or advocacy groups that have a special interest in, or regular contact with, persons characterized above. (Area Agencies on Aging, Dept. of Children and Families, homeless shelters, public housing authorities, etc.)
- Arranging for applications to be taken by, or at the site of, those organizations or advocacy groups.
- Placing multi-lingual posters and materials describing the program in public areas and buildings.
- Media advertising including placing TV and radio ads to reach people who cannot read and those with limited English skills.
- Providing interpreters for non-English speaking applicants or applicants with communications handicaps.
- Working with energy providers to provide customers with program information.

### 2.2.10 Determining Building Eligibility

Every dwelling unit weatherized must meet both the client eligibility and the building eligibility requirements.

Structures will be assessed for compliance with the State Historic Preservation Office (SHPO) Programmatic Agreement. Weatherization services or select measures may not be eligible on certain homes as identified by a Section 106 review.

Structures will be assessed to ensure that weatherization measures will be effective before the expenditure of grant funds. The expected lifetime of measures and their benefit will be taken into consideration when assessing structure eligibility. Conditions which constitute such limitations may include, but are not limited to:

- If remodeling or rehabilitation of the property (either planned or in progress) is substantial enough to degrade the effectiveness of weatherization.
- If the conditions of structural or mechanical systems of the home are such that it is not safe and possible to install or complete core measures; i.e., furnace safety and efficiency inspections and repair, blower door guided envelope air sealing, insulation.
- If it is not possible to improve the condition of the structure sufficiently to allow the installation of the core measures with the maximum contribution for incidental repair, or with coordinated rehabilitation funding.
- If, at a minimum, health and safety items cannot be addressed.

If conditions exist which preclude the weatherization of the structure, a brief written description of the conditions should be supplied to the client. This notification should be coupled with the notification that weatherization assistance is postponed or deferred until such time that the problem conditions have been resolved. The agency should inform the client of a “reasonable” amount of time for the resolution of the problem conditions. See [Deferral Policy](#) section.

#### 2.2.11 Ineligible Units

No weatherization grant funds shall be used for the following:

- To weatherize a dwelling unit which is condemned, scheduled for demolition, or designated for acquisition or clearance by a Federal, State, or local program within twelve months from the date weatherization of the dwelling unit would be scheduled to be completed. Subrecipients must check with city or county authorities or the City Health Department for condemnation proceedings. The Kansas Department of Transportation may also be a source of information regarding possible condemnation through right-of-way condemnation procedures.
- To install or otherwise provide weatherization materials for a dwelling unit weatherized previously with the same grant funds since September 30, 1994. Except: That such dwelling unit has been damaged by fire, flood or act of God and repair of the damage to weatherization materials is not paid for by insurance; See [Reweathering](#) section.
- No owner-occupied residence shall be weatherized if it is being offered for sale.
- No renter-occupied residence shall be weatherized if it is being offered for sale, unless both of the following apply:
  - It can be demonstrated that the residence will continue to be occupied by eligible tenants.
  - Weatherization work performed is not incorporated into the sale price.

#### 2.2.12 Non-Traditional Dwellings Eligibility

Subrecipients will exercise caution in dealing with non-traditional type dwelling units to ensure that they meet Program regulations on whether the unit is, in fact, eligible. The weatherization of non-stationary campers and trailers that do not have a mailing address associated with the eligible applicants is not

allowed. The use of a post office box for non-stationary campers or trailers does not meet this requirement.

#### 2.2.13 Reweathering

Dwelling units that meet all other requirement but were partially weatherized under this program or under other Federal programs during the period September 30, 1975 through September 30, 1994 may receive further financial assistance for weatherization under this part.

Dwelling units weatherized after September 30, 1994 may be reweatherized, at the discretion of the Subrecipient weatherization director, utilizing eligible funding from a different funding source than what was originally used.

Dwelling units damaged by fire, flood, or act of God and repair of the damage to weatherization materials is not paid for by insurance may be reweatherized.

Homes which are eligible for reweatherization may be reweatherized at the discretion of the Subrecipient weatherization director. Subrecipients are instructed not to repeat weatherization measures which were previously completed unless those measures are no longer effective. Each dwelling unit must receive a new energy audit which takes into account any previous energy conservation improvements to the dwelling. All re-weatherized units must meet current weatherization standards upon completion. The State will assure through monthly review of production that re-weatherization's do not exceed ten percent of the State's completed dwelling units.

#### 2.2.14 Eligible Rental Units:

Renter occupied housing units are eligible for weatherization services if they meet all other eligibility requirements. Signed permission from the owner of each eligible dwelling unit must be obtained and documented in the client file prior to performing any inspections, tests, or weatherization measures on a dwelling. Rent to own and contract for deed arrangements shall be considered rental properties.

K-WAP does not require landlord contributions to provide weatherization services. However, funding restrictions (i.e. LIEAP rental furnaces, excessive health and safety or incidental repairs, or other funding limitations) may require a landlord contribution to allow comprehensive weatherization work to proceed. Landlord contributions should be sought for the weatherization of multifamily complexes to maximize the benefits to the low-income clients and to stretch limited WAP funding.

In compliance with 10 CFR 440.22, the following procedures shall be used in the weatherization of rental dwellings:

- Subrecipients shall use the financial assistance guidelines for dwelling units to determine eligibility.
- Subrecipients shall obtain a signed agreement (Landlord Rental Agreement) from the owner/landlord of the building or his designated agent authorizing the work to be done and, if applicable, agreeing to the landlord's financial participation in weatherization costs. Subrecipients should develop a detailed description of the weatherization measures authorized and costs assigned to the landlord and the agency. Rents shall not be raised solely due to the weatherization assistance provided under this part. The agreement shall include a provision that the landlord agrees not to raise the rent for at least one year from the time the work is

completed, unless raising the rent is based on factors unrelated to the weatherization improvements. The client shall be provided a copy of the signed agreement. The K-WAP will not use a lien on landlord property.

- In order to weatherize an entire multi-family building, the building must have at least 66 percent program eligibility rate (50 percent duplex or four-plex) including those units that will become eligible within 180 days under a Federal, State or local government program for rehabilitating the building or making similar improvements to the building. On a case-by-case basis, with prior approval from DOE, certain eligible types of large multi-family buildings may be eligible for weatherization if as few as 50 percent of the units were certified as eligible for weatherization. This exception applies only to those large multi-family buildings where an investment of DOE funds would result in significant energy-efficiency improvement because of the upgrades to equipment, energy systems, common space, or the building shell.
- The maximum amount of grant funds which can be spent for weatherization is determined the same way as in single-family owner-occupied units, which is by managing the average cost per unit. For reporting purposes, all units receiving weatherization must be reported as “completed units.”
- Approved measures (10 CFR 440, Revised Appendix A) that are applicable to multi-family units should be assessed, prioritized and implemented in an energy savings/cost effective manner appropriate to the particular building.
- A building which is totally vacant may be weatherized only in conjunction with a Federally funded rehabilitation project, and with the assurance that at least 66 percent of the units will be leased to income eligible tenants. If the building is partially occupied, vacant units may be weatherized if 66 percent of the total units are occupied by eligible tenants, but the maximum funding which can be used for the building is determined by the number of eligible units, as in the example used in #3.
- No undue or excessive enhancements shall accrue to the value of weatherized dwelling units in Kansas. Weatherization measures to be completed on rental units, as on owner units, must be cost-effective, as determined by approved unit profiles or by an individualized REM/Design audit. The State may recoup costs of excessive weatherization measures.
- Subrecipients shall document how the benefits of weatherization services accrue primarily to the low-income tenants residing in the rental unit if the tenants do not directly pay their own primary heating bill. Examples and guidance can be found in WPN 16-5.
- Subrecipients shall include in their rental agreements the address and telephone number of the Legal Aid Society office(s) serving their areas, as well as a Statement that Legal Aid is responsible for arbitrating landlord-tenant disagreements arising from weatherization activities completed on the units.
- Shelters are eligible for weatherization activities, as follows:
  - “Shelter” is defined as a dwelling unit or units whose principal purpose is to house on a temporary basis individuals who may or may not be related to one another and who are not living in nursing homes, prisons or similar institutional care facilities.
  - For the purpose of determining how many dwelling units exist in a shelter, the minimum size for each dwelling unit within the shelter shall be 800 square feet of living space, or each floor of the shelter may be counted as a dwelling unit.

### 2.2.15 Historic Preservation Review

In accordance with the Programmatic Agreement between DOE and State Historic Preservation Office (SHPO) and Section 106 of the National Historic Preservation Act, 16 U.S. C 470F and 36 CFR part 800, weatherization will follow the following guidelines when applying measures to wall insulation and window repair or replacement.

Whereas the projects funded are subject to review under Section 106 of the National Historic Preservation Act, 16 U.S. C 470F (NHPA) and its implementing regulations at 36 CFR part 800 and include rehabilitation, energy efficiency retrofits, renewables and weatherization undertakings, the following guidelines have been set forth for any structure listed or eligible for listing on the National Historic Register.

#### 2.2.15.1 *Wall insulation*

Insulation will not result in noticeable holes on the exterior.

Remove siding to blow insulation and replace siding. Cause no visible damage during removal, blowing insulation, capping holes and replacing siding.

Wood siding can be drilled to install insulation but the holes must be plugged with a wood plug, sealed in place, sanded smooth and repainted with matching paint. Plugs cannot be visible.

Cellulose insulation which uses aluminum or ammonium sulfate as the fire retardant cannot be used. (Cellulose treated with boric acid as the fire retardant is approved.)

Interior paint must offer/work as a vapor barrier at all interior surfaces/walls containing the newly blown insulation. Interior paint can be client applied to the near paint ready patch per the SWS Field Guide. Final inspection can proceed prior to the client completion of interior paint.

Insulation installed under a new siding is not permitted if it covers architectural features. (No siding and insulation overlay replacement allowed.)

Attaching insulation to inside, framed out with firing strips is not allowed if it covers original features such as cornices, chair rails, window trims, or if it causes the destruction of historical plaster or other wall finishes.

Following manufacturer's instructions for installing insulation with appropriate fireproofing, rigid foam insulation must be covered by appropriate fireproof covering (1/2" gypsum wallboard). The insulation is not to be left exposed.

#### 2.2.15.2 *Blown from the inside*

Must not damage historical plaster or other wall finishes.

Must follow KDHE Lead Based Paint guidelines.

Must be refinished (not seen when complete). Interior paint can be client applied to the near paint ready patch per the SWS Field Guide. Final inspection can proceed prior to the client completion of the interior paint.

#### 2.2.15.3 *Windows*

Replacement windows can only be installed with the approval of SHPO.

Installation of storm windows that would obscure historical windows requires SHPO approval.

Damaged windows should not be boarded over without SHPO approval.

#### 2.2.15.4 Doors

Exterior door replacement can only be performed with the approval of SHPO.

### 2.3 REQUIRED CLIENT FILE DOCUMENTATION

Client files serve as a record and timeline for all information pertaining to each individual weatherization job. Each subrecipient may have slightly different structures and pieces of information however each file must have certain eligibility and procedural documents. If electronic records are kept of certain documents, the client file must contain instructions on how and where to locate the documents. Completely electronic records may be kept as long as all information is located in one individualized folder clearly identifying it for the job.

Local agencies are encouraged to adopt client file checklists to ensure all required documents are available for each job. A sample checklist of all K-WAP required documents can be found on [www.kshousingcorp.org](http://www.kshousingcorp.org).

Documentation for each completed client file must contain:

Client Application for weatherization assistance

Signed owner or renter and landlord permission

Signed Alien Statement

Signed documentation informing the client of their Right to Appeal

Signed Housing Occupant Agreement

An owner signed Statement granting or denying K-WAP to drill to inspect or add insulation

Signed Utility Information Release

A client housing questionnaire asking questions about the structure and any existing health conditions that may be exacerbated by weatherization

Proof of home ownership (can be in form of county appraiser website documentation, deed, tax statement or bill, or title for manufactured homes).

Client income documentation

Subrecipient income verification worksheet with the name of the person performing the income eligibility calculation.

Pre-Inspection home inspection form

Pre-Inspection Combustion Appliance Forms (furnace and water heater)

Inspector signed Mold Assessment Form

Lead Pamphlet Declaration

Client signed Radon Informed Consent Form

Occupant Pre-Existing or Potential Health Conditions Release

Hazard Identification and Notification Form

Client signed Unvented Heater Removal Permission Form- if applicable

Client signed Hazard Form- if applicable

REM/Design Improvement Analysis Report

Equipment sizing report- if applicable

REM/Design Fuel Usage- Pre-and Post-weatherization (Only for KCP&L and other specified grants)

Project Work Order

Year of home construction and State Historic Preservation Office (SHPO) approval if applicable

ASHRAE 62.2-2016 calculation- DOE jobs or ASHRAE 62-1989 calculation- LIEAP jobs

Final inspection with client's signature and date stating that all work has been satisfactorily completed.

Final Inspection checklist with final inspector signatures and dates stating that all work has been satisfactorily completed in accordance to the Kansas SWS Field Guide.

Post Inspection Combustion Appliance Forms (Furnace and Water Heater)

Worst Case Combustion Draft Test results- if applicable

ASHRAE 62.2-2016 flow verification – if applicable

Rework Form with client and final inspector signatures and dates stating that all work has been satisfactorily completed – if applicable

Job invoices and material usage forms

Lead Safe Work Practices Declaration with Certified Renovator's signature

Unit Cost Sheet

Completed Building Weatherization Report (BWR) or similar Hancock Export Job Report

Hancock Installed Measures List per job

## 2.4 INSPECTION GUIDELINES

### 2.4.1 Auditor/Inspector Training and Certification Requirements

Since 1995, the Kansas Weatherization Assistance Program has maintained an Inspector Training and Certification Program for all individuals who conduct pre- or post-weatherization inspections. In 2015, the Quality Control Inspector (QCI) certification became a requirement for all post inspectors working in

the DOE funded Weatherization Program. Beginning in 2018, a multitrack, tiered training and certification scheme was introduced.

\*Effective April 1, 2018, existing certified KHRC Weatherization Inspectors in good standing will be grandfathered in and will receive a KWAP certification. Individuals with a BPI HEP certification (either QCI or Energy Auditor) will receive a full KWAP certification to align with their HEP certification expiration date. Individuals without a BPI HEP certification will receive an 18-month probationary KWAP certification. This will allow them to continue working independently within the program for a maximum of 18 months until they can obtain a BPI HEP certification.

Comprehensive training for auditors and inspectors is essential for sound decision-making in the field, even when aided by a decision-making tool like REM/Design. Auditors must understand how to accurately measure, describe, diagnose, and evaluate the energy features of a house. They must also understand what improvement measures are effective and appropriate, and how those improvement measures may affect potential health and safety hazards in the house.

Training is provided through a combination of field, classroom, and online training. Competency is assessed through written and field testing and the obtaining, and maintaining, of industry certifications.

#### *2.4.1.1 New Auditor Training and Certification*

To allow the on-boarding of new auditors into the weatherization workforce, a multi-track training and certification scheme has been developed. Additionally, a list of recommended and required training courses is provided to help ensure individuals receive exposure to pertinent resources and skill sets to help them be successful. See: Suggested Auditor Training Plan available at <http://www.kshousingcorp.org/more-program-information.aspx>.

The options and diagram below outlines the three-different training tracks a new auditor can follow. These options allow for greater flexibility than historically available while still maintaining quality and accountability. All uncertified employees must be under the direct supervision of a certified weatherization auditor/inspector until they pass the Kansas Weatherization Infield Evaluation with a KHRC representative.

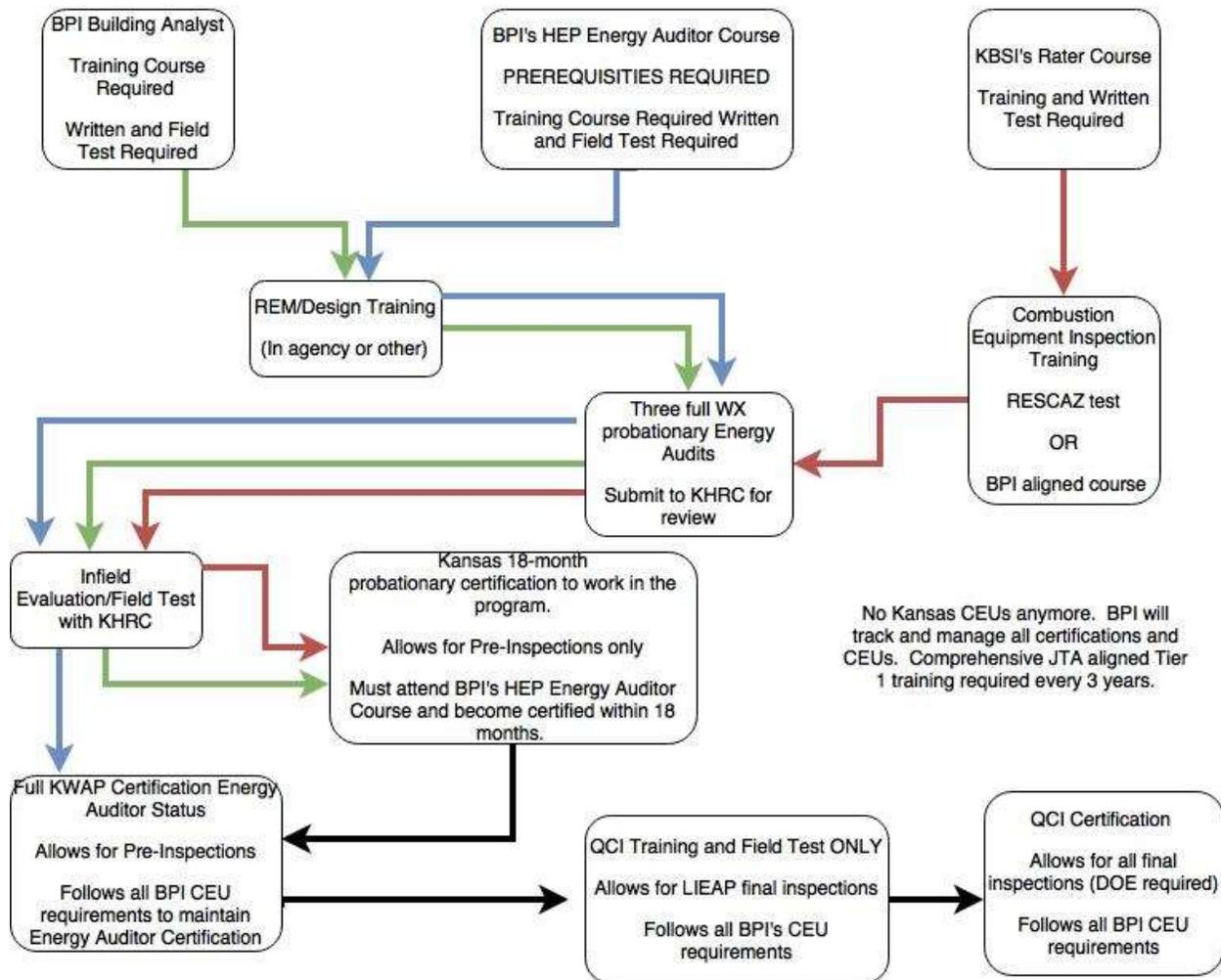
**Track A:** BPI's Building Analyst training and certification. Individuals take a BPI Building Analyst aligned training course and must successfully pass the written and field testing components to become certified Building Analysts. Additional REM software training is required and the successful approval of three (3) weatherization probationary energy audits must be completed before scheduling the infield evaluation component with KHRC.

**Track B:** BPI's Home Energy Professional Energy Auditor training and certification. Individuals must meet BPI's prerequisites to challenge the Energy Auditor Exam. Once BPI's approval is obtained, individuals take a BPI Energy Auditor aligned training course and must successfully pass the written and field testing components to become certified BPI Energy Auditor. Additional REM software training is required and the successful approval of three (3) weatherization probationary energy audits must be completed before scheduling the infield evaluation component with KHRC.

**Track C:** Home Energy Rater (or equivalent weatherization course) administered by Kansas Building Science Institute (KBSI). Individuals take the course and successfully pass the written exam. Additional combustion equipment inspection training is required and individuals can take and pass the RESCAZ

computer simulation exam offered by KBSI or they may attend and pass a BPI aligned combustion equipment inspection course. Taking the KBSI route allows individuals to pursue the RESNET Rater Certification (other requirements apply) but this is not a weatherization requirement. Three (3) weatherization probationary energy audits must be completed before scheduling the infield evaluation component with KHRC.

## Kansas Weatherization Certifications



Individuals coming into the weatherization program with BPI or RESNET Rater Certifications, regardless of where they obtained the certification, will be assessed on a case-by-case basis to determine additional training needs.

All auditor certification classes, except software training, include both classroom and field components and a performance exam. Upon successful completion of the training components, auditor candidates are required to submit three weatherization audits to KHRC for review. Each of these review audits

must include a completed field data collection form (pre-inspection form), mechanical inspection forms, photographs of the house, a completed REM/Design audit with improvement analysis, appropriate ASHRAE calculations, and weatherization work order. Upon successful completion of the three sample audits, auditor candidates complete an infield evaluation to demonstrate competency in the entire weatherization auditing process ranging from client interview to the final results of the REM/Design energy audit and weatherization work order. Successful candidates completing tracks A and C receive an 18-month probationary certification allowing them to conduct initial energy audits independently. Within 18-months individuals must obtain certification status by obtaining the BPI HEP Energy Auditor Certification. Candidate who are on track B, who have already received the BPI HEP Energy Auditor Certification are fully certified and allowed to conduct initial energy audits independently.

#### *2.4.1.2 Auditor/Inspector Training*

Weatherization auditors are those individuals who only conduct initial energy audits. Weatherization inspectors are those individuals who conduct both initial energy audits and post weatherization inspections.

Auditors and inspectors will receive training in accordance with WPN 15-4 and Memorandum 034. Training activities for WAP field staff are to be designed as Comprehensive (Tier 1) or Specific (Tier 2) training. Comprehensive (Tier 1) training is comprehensive, occupation specific training which follows the curriculum aligned with the Job Task Analysis (JTA) for that occupation. Specific (Tier 2) training is issue specific, short term trainings to address specific skills or tasks.

WAP field staff are only those technical staff members directly employed by Grantee and Subrecipient agencies, such as auditors and inspectors. Contract auditors and inspectors are not explicitly included, but may be eligible for T&TA funded training as long as a retention agreement is obtained. Contracted installers are not to be considered part of WAP field staff for the purpose of targeted T&TA activities.

Comprehensive (Tier 1) training will be closely aligned with credentialing requirements for the given task (i.e. energy auditor or QCI). Auditor and inspector training will be based on a three-year training cycle. Individualized training plans will be allowed to be structured in the manner best suited for each agency, but most plans will focus on receiving intensive 1-2 week trainings every three years. This time table is consistent and conducive to receiving intensive training in anticipation of re-certifications exams. Specific (Tier 2) training will be obtained on an as-needed basis and on a rolling basis to fulfill BPI certification CEU requirements.

Comprehensive (Tier 1) training must be provided by a DOE approved accredited training program. Currently, IREC accredited training centers are the only training centers that meet this requirement. Training will be provided by the contracted training provider in the manner best suited for the situation, but will primary be of hybrid distance learning and in person training. Santa Fe Community College has become a valued IREC accredited training provider for the Energy Auditor and QCI certifications and will be a K-WAP recommendation for Comprehensive (Tier 1) training.

Specific (Tier 2) training will be provided on an as-needed basis. The specific need and technical expertise required will determine the training provider. State technical staff or network partners such as the Kansas Building Science Institute (KBSI) can provide specialized and short-term training. Attendance in specialized training is mandatory as announced. Non-compliance may result in state certification suspension or termination.

#### 2.4.1.3 Auditor/Inspector Certifications

KWAP auditors are required to obtain, and maintain, their BPI Energy Auditor Certification and receive comprehensive JTA aligned training every three years.

The DOE grant requires that KWAP post inspectors obtain, and maintain, their BPI Quality Control Inspector (QCI) Certification and receive comprehensive JTA aligned training every three years. Only QCI certified individuals may conduct DOE funded final inspections.

To allow increased flexibility, KWAP allows individuals who have successfully completed QCI training and have passed the QCI field exam to conduct LIEAP funded final inspections. Success on the written exam and QCI certification is not required. Temporary field waivers to this LIEAP requirement may be granted by KHRC in special circumstances by request in writing.

In addition to the BPI certifications, individuals are required to maintain their Kansas Weatherization Assistance Program (KWAP) Certification. This certification will be based on a three-year cycle and will be awarded after individuals receive their first BPI HEP certification (either Energy Auditor or QCI). The KWAP Certification allows individuals to work independently within the Kansas Weatherization Program.

All BPI certified auditors and inspectors working within KWAP must maintain a valid copy of their BPI certifications with KHRC.

All WAP field staff must obtain, and maintain, KDHE's Certified Renovator (RRP) certification or other acceptable certification. Acceptable certifications include KDHE's: Lead Abatement Worker, Lead Abatement Supervisor, Risk Assessor, and Lead Inspector.

#### 2.4.1.4 KWAP Certification Suspension or Termination

The KWAP certification will be suspended or terminated when individuals lapse in either their comprehensive training plans or BPI HEP certifications. KWAP certification may be suspended or terminated if state specified mandatory trainings are not completed.

Individuals found not upholding the high quality of work expectations and standards of the KWAP program will be notified in writing and their employer notified. For minor infractions, a written warning shall be provided. For larger or reoccurring infractions, a corrective action plan will be required to be developed and implemented and will be tracked to resolution. Failure to fulfill the corrective action plan will result in suspension or termination of the KWAP Certification.

#### 2.4.2 Pre-Inspection/Audit

Field Audit Procedures: The Kansas Weatherization Assistance Program uses a detailed field inspection, testing, and data collection protocol consisting of eight general steps. This protocol ensures that all important features are measured, evaluated, and documented. This auditing protocol is applied to all building types including; single family, manufactured housing, and small multifamily. Each audited unit receives improvement recommendations, including; Energy Conservation Measures, Health and Safety repairs or modifications, and Incidental Repairs that are specifically tailored to the building type and needs of the structure. All improvement recommendations must be allowed per program guidelines.

*Step 1 – Client Interview:* The first step involves providing information to the weatherization client about the weatherization process and gathering important information about the dwelling from the occupants. Occupants may be asked how long they have lived in the dwelling and information about comfort, health and safety issues, and maintenance issues. For example, it is useful to know if certain rooms are uncomfortable, if cold air drafts are experienced and where, if water pipes have ever frozen and where, or if water pipes or the roof leak and where. The inspector attempts to gain as much potentially useful information about comfort concerns, moisture problems, lifestyle issues, client health issues, etc., as possible before beginning the physical inspection process.

*Step 2 – Health and Safety Inspection:* The second step is to inspect the home for existing Health and Safety (H&S) concerns. Auditors will reference the [Health and Safety Plan](#) for guidance and required action when H&S items are identified.

*Step 3 – Instrumented Space and Water Heating Inspection:* Heating and domestic water heating equipment is inspected in step three. This is because it is important to determine if this equipment is operational and if there are significant safety concerns such as a cracked heat exchanger or flue gas venting concerns.

A detailed inspection protocol must be followed based on the type of equipment that is present. The home cannot be weatherized until the inspection is completed and the space and water heating systems are determined to be safe, or if replacement equipment will be required. See section: [Mechanical Equipment Inspections](#).

*Step 4 – Exterior Measurement and Assessment:* Accurate building measurements are required for several reasons:

- The REM/Design audit requires an accurate determination of conditioned floor area and volume.
- The REM/Design audit requires accurate determinations of all surface areas that transmit heat to the outside.
- The REM/Design audit requires accurate determinations of all surface areas and material type for all exterior windows and doors. An accurate work order requires an accurate determination of the areas of all components that are to be treated or modified.
- ASHRAE 62.2 calculations requires an accurate determination of volume.

Inspectors are required to produce accurate, scaled and dimensioned drawings that show a floor plan view. Pictures or drawings of each house's elevation showing window and door placements and other important features like shading, drainage, equipment, utilities, etc. Areas for exterior air sealing or other work are to be noted on the appropriate drawings or pictures.

With the owner's written permission, test holes are drilled to determine whether sidewalls are insulated. Siding type and condition are also noted.

Manufactured home floors and bellies will be inspected to assess existing thermal and air barriers and insulation levels.

*Step 5 – Interior Measurement and Assessment:* Interior spaces are inspected to identify existing thermal and air barriers and identify potential upgrade opportunities. REM/Design requires accurate

determinations of surface areas, construction type, and insulation values for all locations of the thermal and air barrier.

The attic is entered and inspected to determine the type and amount of any existing insulation. The attic floor is visually inspected for major air by-passes. The presence of attic ventilation is noted and a determination is made if additional ventilation will need to be installed. See section: [Attic Ventilation](#).

For inaccessible attics, such as in manufactured homes, mobile homes, or vaulted ceilings, insulation values will be assessed by drilling test holes and measuring or viewing with a bore scope.

Ducts located in unconditioned spaces are observed for visible air leaks and the presence of insulation.

Holes or penetrations in interior walls, especially in balloon-framed structures, can allow conditioned air to move from the structure through interconnected framing conduits. Holes or penetrations which would allow insulation to blow into the living space are documented for sealing prior to the installation of sidewall insulation.

Floors between stories are inspected to determine if they contain open floor joist areas that can act as air passage conduits.

Cantilevered floors will be inspected from either the interior or exterior to assess the presence and/or alignment of the air and thermal boundary and to assess the cavities for potential upgrades.

The sill plate and band joist area in homes can be a major source of air infiltration. These areas are inspected and documented for potential upgrades.

Basement grade entries, foundation entry doors, and crawl space entry hatches are inspected to ensure that they provide an effective barrier to the penetration of water and a durable air seal.

A six-mil poly vapor barrier is installed over all exposed dirt floors within the pressure/thermal boundary, as feasible, as required by the Health and Safety plan.

*Step 6 – Blower Door Air Leakage Testing:* A blower door test is required to determine the leakage rate of the dwelling and to locate and prioritize air sealing measures. Both a pre-weatherization and a post-weatherization test are required. The amount and location of air sealing is determined by the auditor's recommendations and the cost effectiveness as determined by REM/Design. Blower door pre-test should be performed after major holes in the building shell are repaired or temporarily patched.

Blower door tests will be conducted on every unit to be weatherized in a multifamily unit. Multifamily units will be inspected as individual units and a separate REM/Design audit will be performed for each unit.

*Step 7- Advanced Diagnostics and Assessments:* In addition to the heating system and water heater safety and efficiency diagnostics and blower door testing, several other assessments may be performed during the audit and post inspection. Diagnostic testing will be conducted to show compliance with currently adopted ASHRAE ventilation requirements. Existing and installed exhaust fans and ventilation systems shall be measured with a flow hood to determine effective ventilation rates and to calculate required continuous ventilation needs. Site conditions, diagnostic test results, and calculated required ventilation rates will be documented in the client file to show compliance. Pressure pan testing may be used to determine dominant duck leakage, such as on truck lines in manufactured homes. Quantitative

duct leakage testing may be performed with a Duct Blaster or similar device if deemed necessary to diagnosis ductwork issues. Zonal Pressure Diagnostics (ZPD) may also be conducted if deemed necessary to assess or confirm air barriers and to quantify air leakage between zones. A manometer may be used to quantify pressure imbalances throughout the structure.

*Step 8 – Client Education:* The auditor discusses the results of his or her investigation and inspection with the client and also describes additional measures or lifestyle measures they can undertake to further reduce energy use.

#### 2.4.2.1 Attic Ventilation

Many of the homes weatherization will encounter will have inadequate attic ventilation. The requirement for attic ventilation is commonly a building code requirement and inadequate attic ventilation would be considered an existing code compliance issue. Weatherization has no requirement and is not equipped to correct existing code compliance issues.

However, if and where the local code is triggered and requires code compliance because of a weatherization activity, weatherization will install attic ventilation to become code compliant. This would be in compliance with the SWS 4.1088.1 which reads “Attic ventilation will be recommended or installed if local code requires attic ventilation during weatherization or retrofits.” Follow all code requirements and SWS 4.1008.1a-e. When the roof venting requirement is triggered, agencies shall document in the client file the actual code that was triggered and what weatherization activity triggered the code/permit.

Additional attic ventilation is allowable if the auditor makes, and documents, the determination that additional ventilation is need for the attic to function properly (i.e. removal of moisture, prevention of ice damming, etc.).

Installing attic ventilation (roof vents or gable vents) to facilitate access to the attic or to aid in blowing insulation is allowable and the audit/work order shall explain the installation purpose.

### 2.4.3 Windows and Doors

#### 2.4.3.1 Windows

##### 2.4.3.1.1 Primary Window Assessment

1. All existing operable windows must remain operable.
2. Non-operable windows may be permanently sealed against air leakage if agreed and documented to by the client.
3. Window work on pre-1978 houses must be performed using lead safe work practices.

Window Air Leakage: Window air tightening measures such as caulking, glazing, weather stripping, sash locks, or glass replacement are considered air sealing measures.

Window Repairs:

1. When feasible, windows must be repaired, rather than replaced.
2. Replace missing, broken, and severely cracked panes.

3. Window glazing compound shall only be replaced if the existing glazing is deteriorated to the degree that the window glass is in jeopardy of falling out of the sash. Caulking of loose panes of glass from the interior is recommended if existing storm windows are present.

#### Window Replacements:

1. Window replacements must be based primarily on an energy-saving decision process rather than on client requests, aesthetics, or ease of use.
2. Replacement of windows must be justified by the energy audit.
3. Replacement of primary windows not yielding an SIR greater than 1.0 may be considered if they are deteriorated beyond air sealing repairs. Photo documentation clearly showing that the existing window is beyond repair must be present in the client file. Windows beyond repair may be replaced as an air sealing energy conservation measure as long as the cost of the replacement is included in the air sealing SIR calculation. The SIR of the proposed window replacement shall remain visible on the Improvement Analysis to show that it was not eligible as a standalone measure. No window degradation adjustment is allowed. A \$500 per house price limit applies but field waivers are available upon request. These windows must include a note stating beyond repair or other similar justification in the comments section of the energy audit measures list.

#### 2.4.3.1.2 Storm Windows

1. When feasible, existing storm windows may be repaired as air sealing.
2. Replace missing, broken, and severely cracked panes as an air sealing measure.
3. Weep holes are not to be sealed shut.
4. Installation of storm windows must be justified by the energy audit.
5. Repaired or installed storm windows must be installed with appropriate exterior grade fasteners.

#### 2.4.3.2 Doors

##### 2.4.3.2.1 Exterior Door Assessment

1. Exterior doors must be assessed for needed repairs, air leaks, and comfort related problems.
2. All existing egress doors must remain operable.
3. Non-operable, non-egress doors may be permanently sealed against air leakage if agreed to by the client.
4. Door work on pre-1978 houses must be performed using lead-safe weatherization procedures.

Door Air Leakage: Door air tightening measures such as weather stripping, sweeps, door bottoms, or thresholds are considered air sealing measures and must be based on visible inspection or blower door detection.

#### Door Repairs:

1. When feasible, a door must be repaired rather than replaced.
2. Door adjustments or repairs such as door stops, shaving/fitting, striker plate adjustment or replacement, door reinforcement plates, or locksets can all help a door obtain and maintain minimal air leakage.

### Exterior Door Replacements:

1. Door replacements must be based primarily on an energy-saving decision process rather than on client requests or aesthetics.
2. Individual replacement doors may only be installed if the cost of the door, and all associated components, is justified by the energy audit.
3. Replacement of exterior doors not yielding an SIR greater than 1.0 may be considered if they are deteriorated beyond air sealing repairs. Photo documentation clearly showing that the existing door is beyond repair must be present in the client file. Doors beyond repair may be replaced as an air sealing energy conservation measure as long as the cost of the replacement is included in the air sealing SIR calculation. The SIR of the proposed door replacement shall remain visible on the Improvement Analysis to show that it was not eligible as a standalone measure. No door degradation adjustment is allowed. A \$500 per house price limit applies but field waivers are available upon request. These doors must include a note stating beyond repair or other similar justification in the comments section of the energy audit measures list.

#### 2.4.3.2.2 Storm doors

The repair or replacement of storm doors is not permitted.

### 2.4.4 Mechanical Systems and Other Space Heating Systems

#### 2.4.4.1 Mechanical Equipment Inspections

All mechanical systems, i.e. furnaces, HVAC, water heaters, will be assessed at both the initial audit and at the post inspection. The most recently approved mechanical inspection forms available at <http://www.kshousingcorp.org/more-program-information.aspx> will be utilized to record and document the results.

Separate mechanical inspection forms will be used for pre- and post-inspections. Separate mechanical forms will be used for each mechanical system. All mechanical systems in the home will be inspected.

Mechanical inspection forms will clearly identify the individual conducting the inspection and the date it was performed.

Mechanical equipment forms will collect brand, model, and serial number of equipment. Equipment shall be modeled to reflect published efficiency usage as identified by the model number. The following estimations and assumptions can be used when published data is unavailable:

- Atmospheric Drafting Forced Air Furnace- 65% AFUE
- Fan Assisted Forced Air Furnace – 80% AFUE
- Sealed Combustion Forced Air Furnace – 92% AFUE
- Floor Furnace – 65%
- Wall Unit- Gravity Flow- 70%-72% AFUE
- Wall Unit- Blower – 74%-76% AFUE
- Wall Unit- Direct Vent- 80% AFUE
- Console Unit- Gravity Flow- 70-72% AFUE
- Console Unit- Blower- 74%-76% AFUE
- Console- Direct Vent- 80% AFUE

- Electric Water Heater- 0.91 EF
- Gas/Propane Water Heater- 0.59 EF
- Central forced air AC – Try to identify the age of the equipment and use the table below. When age can't not be determined, efficiency assumptions must be conservative.

<b>AC SEER Rating History</b>	
Before 1980	6
1980-1985	7
1986-1991	8
1992-2005	10 to 12
2006 +	13+

Mechanical systems must be deemed safe before weatherization measures are installed and must be documented as safe at the completion of the weatherization work. This requirement applies year-round regardless of whether the equipment is in use.

Homes without any heating systems will be reviewed on a case by case basis by contacting KHRC before weatherization services begin.

All combustion equipment will be tested with the Combustion Appliance Zone (CAZ) in the worst-case depressurization state. This is required at the initial audit and final inspection and highly encouraged on any day when work has been done that could affect draft (i.e. air sealing, flue work, adding ventilation).

**2.4.4.2 Unvented Heaters**

Homes heated by unvented combustion space heaters are considered unsafe and shall not be weatherized unless the heaters are removed from the premises, vented to the outside, or replaced with an appropriate heating unit. A secondary or backup unvented heater may be allowed to remain in place and operable as long as it is labeled as conforming with ANSI Z21.11.2. These secondary units should be tested for high levels of CO and client education on their risk and hazards must be provided.

**2.4.4.3 Electric Resistance Space Heaters**

Electric space heaters are not considered unvented heaters nor are they considered unsafe heating sources for H&S weatherization purposes. No weatherization funds shall be used for the repair or replacement of electric resistance space heaters. Electric resistance heating sources, both forced air and space heaters, should be proposed for ECM replacement with heat pumps.

**2.4.4.4 Solid-Fueled Space Heaters and Fireplaces**

Solid fueled space heaters include wood stoves, coal stoves, pellet stoves, and fireplaces. Solid-fuel fired forced air furnaces and boiler systems should be treated as vented heating systems and are not covered here.

Assess solid fuel fired space heaters to identify any unsafe installation or operational concerns. Use the KWAP Solid Fuel Space Heater Inspection Form found here: <http://www.kshousingcorp.org/more-program-information.aspx>.

Repair or removal is an allowed H&S measure for primary and secondary solid fuel-fired heating appliances. Replacement is allowed for primary units only. Flue repair and proper protection of combustibles is allowed for both primary and secondary units. Install replacement primary units and/or flues according to applicable codes, standards, and manufacturer's specifications. Providing adequate combustion air is allowed.

Fireplaces can present special hazards that may be affected by weatherization. Fireplaces, as well as all solid fuel appliances, should be inspected for visual evidence of soot on the walls, mantel, or ceiling, or creosote staining near the chimney/flue pipe. These can indicate combustion/drafting issues. Assess whether the fireplace is a primary heating source, a backup heating source, or merely decorative in nature. Operational fireplaces used for primary heating should have the CAZ zone tested under worst case conditions. CAZ depressurization exceeding 5 pascals in the space having the fireplace should have pressure imbalances corrected, additional combustion air added, or the fireplace disabled.

When fireplaces are used they can create negative pressures throughout the home by principles of the stack effect. When a fireplace is used for primary heating, other combustion appliances, such as gas water heaters, should be tested under simulated worst-case conditions. A blower door can be set to run at 300 CFM (depressurization) to mimic the airflow dynamics likely when the fireplace is in use. All combustion appliances should be able to safely establish and maintain draft under worst case conditions.

#### *2.4.4.5 Mechanical System Repair and Replacement*

Mechanical systems will be repaired or replaced as deemed necessary and/or eligible by the energy audit or H&S policies. Combustion mechanical system repair or replacement will be completed prior to installation of other measures. Unsafe primary units must be proposed for replacement in the energy audit to determine if the system can be replaced as an ECM prior to repair or H&S replacement. If the unit does not qualify as an ECM, the unit will be assessed for repair or H&S replacement. If the estimated cost of repairs exceeds 50% of the estimated replacement cost, the piece of equipment shall be replaced.

Non-functioning primary heating systems will be inspected to the extent possible for H&S issues and possible repair items. Before any repair, non-functioning units will be proposed for replacement in the energy audit to determine if the system can be replaced as an ECM. The name plate efficiency rating shall be used in the audit tool. This logic allows an inefficient, albeit inoperable, unit to be replaced as an EMC before any repair costs are incurred. If the unit does not qualify as an ECM, the unit will be assessed for repair or H&S replacement. If the estimated cost of repairs exceeds 50% of the estimated replacement cost, the piece of equipment shall be replaced.

Where multiple mechanical systems are present, all systems will be inspected. Repair, or a clean and tune, of multiple systems is allowed. Unless a field waiver is granted, only one primary system shall be replaced.

Replacement or installation of secondary units is not allowed. Unsafe, or non-functioning, secondary heating systems, including unvented space heaters, must be repaired, removed, or rendered inoperable or deferral is required.

#### 2.4.4.5.1 Mechanical Systems in Rental Properties

Repairs, modifications, or replacements of space heating and cooling equipment in rental units are allowable measures in accordance with the following:

DOE funding can be used to cover the entire cost of eligible system repairs, modifications, or replacements. In multifamily complexes, a landlord contribution is not required but encouraged to help with covering the cost of mechanical system replacements (see Eligible Rental Units)

LIEAP funding for the replacement of heating and cooling units in rental dwellings is restricted to 10% of the cost not to exceed \$250.00. Exemptions are allowed for low-income landlords, public housing, and emergency shelters. To be eligible for up to the \$250 LIEAP portion of the replacement cost, equipment must be new and installed in compliance with local codes and meet or exceed the minimum efficiency and safety standards of K-WAP. Rental property H&S furnace repairs and water heater H&S modifications, such as flue liners, do not have this price cap.

Please reference specific grant documents to determine mechanical replacement eligibility with other weatherization grants.

#### 2.4.4.5.2 Mechanical System Repair

If the estimated cost of repairs for a mechanical system exceeds 50% of the estimated replacement cost, the piece of equipment shall be replaced.

Mechanical equipment shall be repaired whenever feasible to correct H&S issues before considering replacement. Mechanical equipment shall not be repaired if it will be replaced for efficiency reasons.

General Clean and Tunes of existing mechanical systems are an allowable weatherization energy conservation measure.

Costs for cleaning, tuning, adjusting, or modifying of mechanical systems to correct H&S issues, such as high CO or poor draft, are allowable H&S costs.

Costs for repairs or replacement to combustion gas venting systems (flues) are approved as health and safety measures whether or not a mechanical system is being replaced.

#### 2.4.4.5.3 Mechanical System Replacement

No K-WAP funds will be used for the purchase or installation of used mechanical equipment.

Replacement mechanical equipment shall be competitively bid.

Mechanical system contractors shall be licensed as required by the authority having jurisdiction and obtain all required permits.

Replacement mechanical equipment shall be sized using proper sizing protocols. The REM/Design Equipment Sizing Report, or a Manual J calculation, shall be based on the post-weatherization housing characteristics, including installed mechanical ventilation. A sizing factor up to 125% is permitted and encouraged. Equipment sizing may further be dictated by existing A-coils, or standard industry available equipment (round up to the next available size). Client files must be documented with sizing reports and any other sizing considerations used.

Mechanical equipment being replaced must be removed from the premise by the contractor being paid to install the new mechanical system.

Clients shall be instructed in the operation and maintenance of new equipment. Paperwork and manuals for new equipment will be left at the residence with either the client or near or on the equipment.

Forced air furnaces shall not be installed in a unit without ductwork.

All associated material and labor costs necessary to properly install mechanical equipment shall be considered part of the total equipment cost. The exception is installing a flue liner. Installing a flue liner for an orphaned water heater as a result of installing a replacement furnace is a separate H&S cost and shall not to be considered as a part of the furnace cost. The cost to connect a replacement furnace to existing ductwork, including the cost to install or modify a filter rack, will be considered part of the total furnace replacement cost. New ductwork installation is not considered part of the heating system total cost; see the section on Ductwork.

The installed cost of replacement mechanical equipment for H&S shall not exceed the following unless **prior** permission is obtained from KHRC through a field waiver.

- Forced air furnace: \$2,700 (all 92%+ AFUE units)
- Mobile home forced air furnace: \$3,000
- Exterior “package” forced air furnace: \$3,100 (80%+ AFUE furnace with 14 SEER+ AC)
- Wall or console heater: \$1,700
- Air Conditioning: Not allowed for H&S
- Electric resistance: Not allowed

#### *2.4.4.5.3.1 Water Heating Systems Replacement*

Water heating systems, i.e. water heaters, can be replaced using weatherization funding if one of the following circumstances exists:

- Leaking AND would prohibit the installation of an approved measure or for the protection of a weatherization measure.
- Producing a high concentration of CO
- Installation of an on demand, direct vent, or fan assisted water heater is allowed if the required draft cannot be established after all other considerations. Fuel switching to an electric tank may also be considered. A field waiver is necessary for the previously mentioned.

The installation of a water heating system when one is not present is generally not allowed. Refer to specific grant documents to determine eligibility.

#### *2.4.4.5.3.2 Orphaned Water Heater*

Water heaters that previously shared a vent or chimney with a furnace but as result of a furnace replacement are now vented alone are called orphaned water heaters. Existing orphaned water heaters must pass spillage and draft tests under worst case conditions. Where KWAP replaces a furnace, and orphans a water heater, the metal flue for the water heater must be deemed adequate for the water heater alone or it must be replaced/modified; also see masonry chimneys. Adding a flue liner or resizing the flue may be necessary to achieve acceptable spillage and draft results under worst case conditions.

#### 2.4.4.5.3.3 *Masonry Chimneys*

A flue liner shall be installed where KWAP orphans a water heater or furnace venting into an unlined masonry chimney.

Existing unlined masonry chimneys that have a furnace, water heater, or both, venting into it and will not be impacted by combustion equipment replacement or modifications performed by KWAP, should be considered pre-existing conditions and are typically beyond the scope of the weatherization program. All vented equipment into the chimney must pass spillage and draft tests under worst case conditions. The chimney should be inspected for corrosion, which causes the masonry to crumble and crack, and the client notified.

#### 2.4.4.5.3.4 *Flue Liners*

Flue liners should be galvanized-steel vent pipe, stainless steel pipe, Type B-vent, or a flexible metal liner and sized appropriately. A liner used to vent solid fuel may not also be used to vent liquid or gaseous fuel.

#### 2.4.4.6 *Minimum Efficiency Requirements*

Replacement mechanical equipment must meet or exceed the minimum efficiency requirements set forth below. Where conditions or financial considerations prohibit or prevent meeting these efficiency standards, a field waiver from KHRC may be requested **prior** to installation.

The most efficient equipment available shall be considered.

- Forced air furnace: 92% AFUE
- Mobile home forced air: 92% AFUE
- Exterior forced air package unit: 80% AFUE/14 SEER
- Wall unit, direct vent: 80% AFUE
- Wall unit, fan type: 76% AFUE (H&S only)
- Console, direct vent: 80% AFUE
- Console, fan type: 76% AFUE (H&S only)
- Boiler, hot water: 90%
- Boiler, steam: 90%
- Electric water heater: 0.91 EF
- Gas water heater: 0.61 EF
- Split System Heat Pump: 14 SEER/8.2 HSPF
- Heat Pump PTAC: 10.2 HSPF
- Central Air Conditioning: 14 SEER
- Ductless Mini-Split Heat Pump: TBD

Heat pumps shall have an electrical resistance backup heat strip with the exception of Mini-Splits

#### 2.4.4.7 *Ductwork*

Ductwork shall be air sealed and insulated when located outside the envelop of the home. Sealing and insulating ductwork outside the envelop should be considered a General Heat Waste measure. Sealing, but not insulating, ductwork outside the envelop can also be considered air sealing when audit approved.

#### 2.4.4.8 *Ductwork Modification and Repair*

Ductwork modification and repair is an allowable measure and should be justified and recorded under the appropriate budget category. General repair of distribution systems can be approved as either air sealing, (when outside the envelop), as an H&S measure (when correcting pressure imbalances), or as a documented incidental repair item.

#### 2.4.4.9 *Ductwork Installation*

The installation of a new ductwork distribution system, or the significant modification or replacement of existing ductwork, is only allowed under certain conditions and with certain funding.

The installation of ductwork is allowed when the removal of unvented space heaters or unsafe floor furnaces is required.

On a case by case basis, the installation of ductwork can be considered when replacing an unsafe wall or console units. Consideration should include but not limited to: the size of the home, usage of all the rooms in the home, required Btu's, potential energy savings, comfort issues, installation feasibility, impacts of additional weatherization measures, and total cost.

The cost of ductwork installation must be included with the cost of the heating system on the Improvement Analysis when considering an upgrade to forced air in non-H&S cases.

DOE funds shall not be used for the installation of new ductwork. LIEAP funds may be utilized after all other funding possibilities have been eliminated. Refer to specific grant language to determine ductwork installation eligibility.

#### 2.4.5 *Manufactured Homes ~Being Revised~*

Manufactured Home will be inspected and measures installed in accordance with both the KS SWS Field Guide and the KS SWS Field Guide - Supplemental Specifications for Manufactured Housing.

In accordance with SWS 3.1602.9h, all duct registers will be pressure pan tested and results recorded at both the pre- and post-inspection.

#### 2.4.6 *Inspection Tips and Data Importance ~Being Revised~*

##### 2.4.7 *Final Inspections*

No dwelling unit may be reported to K-WAP as completed until the subrecipient or its authorized representative has conducted a final inspection and certified that applicable work has been completed in a professional manner and in accordance with the priority determined by the audit procedures. The final inspector shall certify and document in the client file that all work performed meets or exceeds the specifications as outlined in the Kansas SWS Field Guide.

The individual who performs the final inspection shall be a certified Home Energy Quality Control Inspector (QCI) or shall possess equal skills and qualifications as permitted by the funding source and approved by KHRC. The DOE grant requires the QCI certification. To allow increased flexibility, KWAP allows individuals who have successfully completed QCI training and have passed the QCI field exam to conduct LIEAP funded final inspections. Success on the written exam and QCI certification is not required for LIEAP. Temporary field waivers to this LIEAP requirement may be granted by KHRC in special circumstances by request in writing.

To meet the final inspection requirements, every agency shall have on staff a certified QCI. It is required that the final inspections be completed by an on-staff certified inspector. The final inspection is the agency's last opportunity to ensure that all necessary work has been completed, performed acceptably, and all measures were addressed according to the KS SWS Field Guide and done in accordance with SIR rankings. Where or when an agency does not have a certified QCI on staff to meet the requirement or inspection demands, a contracted certified QCI may be used with the written approval from KHRC. This contracted QCI may be an independent contractor or an arrangement with a network certified QCI may be established.

Due to the size of many Subrecipients, the desire to have a completely independent QCI may not be feasible. It is acceptable to have the same individual conduct the pre-inspection and perform the final inspection. However, the final inspector shall not be involved in any of the actual measure installation. If the agency uses contracting inspectors for pre-inspections, the final inspection cannot be completed by the same inspector or any other representative of the inspection company that did the pre-inspection.

Inspectors found not upholding the high quality of work expectations and the Kansas SWS Field Guide standards will be written up. Corrective action plans will be required to be developed and implemented. Concerns will be tracked to resolution. Repeat offenders may be suspended or disqualified from conducting final inspections for the K-WAP.

Final inspections include:

1. A walk-through of the dwelling to review and assess the original pre-inspection and audit recommendations and confirm that the measures called for on the work order were appropriate and in accordance with K-WAP procedures.
2. Inspection of all work performed to ensure it has been completed in a professional and workmanlike manner and that it meets or exceeds the specifications of the KS SWS Field Guide.
3. An inspection of material used to ensure appropriate and approved materials were used.
4. An inspection of work areas to make sure the area has been left in a clean and orderly manner.
5. An inspection of work areas to ensure that there were no damages to existing finishes or household items.
6. A thorough inspection to ensure all health and safety issues have been corrected and that no new hazards exist due to weatherization.
7. Safety testing of each combustion appliance in the dwelling. A complete combustion analysis is to be done on each unit, even if the unit wasn't replaced, completing the necessary forms as required.
8. A Worst-Case Draft Test is to be performed on all homes under worse case depressurization conditions. The results and/or other notes must be documented on the necessary form.
9. A check of installed measures that were completed, ensuring that the measures performed on the house were completed in order of priority as determined by the SIR ranking.
10. Post weatherization blower door test.
11. Comparison of the final CFM50 reading with the initial CFM50 reading.
12. ASHREA 62.2 or Building Tightness Limit (BTL) calculations. Verifications and measurement of all mechanical ventilations systems (spot and continuous).
13. Assessment of the post weatherized home for any missed opportunities.

14. The final inspector is responsible for obtaining all the proper signatures on the completed work plan. Dated signatures are required from the client and the final inspector.
15. Any work not completed or requiring additional attention must be noted on an agency rework or memo and be included in the client file. (See section [Change Orders and Reworks](#))

In some cases, it may be impossible to complete a final inspection of the dwelling unit due to client or scheduling obstructions. In these cases, the subrecipient must document the repeated efforts to conduct the inspection. This documentation must be retained in the client file and approved by the subrecipient's Weatherization Director. A note shall be added to each measure not inspected on the audit measures lists indicating that no final inspection occurred. The subrecipient is required to make every effort to obtain signatures and to thoroughly document all work performed.

## 2.4.8 Change Orders and Reworks

### 2.4.8.1 Change Orders

No change order shall be implemented or approved without prior justification. All change order items for energy efficiency measures must receive an SIR 1.0 or greater prior to the completion of the work. The change order must be signed by an authorized representative of the agency before the work is done and filed in the client file along with the audit approval justification.

### 2.4.8.2 Reworks

Units in which weatherization measures were either not completed or were completed unsatisfactorily in desired outcome in performance or professional appearance may need to be reworked. No unit may be reported as complete until all reworks are successfully resolved. All reworks will be documented in the client file. Corrected measures must be re-inspected and the client's and final inspector's dated signature must appear on the document.

In rare instances, the final inspector and program director may determine some minor work as missed opportunities and deduct those line item charges from the work order. Material and labor charges for incomplete or failed installation measures are not allowed expenditures. The client file must clearly indicate which measures were removed from the scope of work and the reduction in the overall job cost. Crews and contractors must be made aware of failed measures and instructed on how to properly complete the work in the future.

Agencies with a high number of reworks may be monitored more frequently and/or have a higher percentage of homes examined until K-WAP can be assured that all deficiencies are resolved.

## 2.5 ENERGY AUDIT PROCEDURES

### 2.5.1 Energy Audit Procedures

The K-WAP utilizes a DOE approved audit tool for every dwelling. K-WAP has received DOE's 5-year audit approval and it is valid through February 26, 2021. The full audit procedures are available upon request. REM/Design is used for single family, individual units in small multifamily structures, and manufactured/mobile homes. Small multi-family buildings are defined as buildings with 25 dwellings or fewer per building and units must be individually heated and/or cooled. These individually heated units will be modeled in REM/Design as individual units using the same field auditing and modeling

procedures as detached single-family units. Subrecipients shall not exceed 20% of the planned production in multi-family units unless a field waiver has been issued. Large multifamily buildings (26+ units per building) or those buildings with a shared heating/cool systems may be weatherized on a case-by-case approval by KHRC or DOE. The audit and assessment procedures must be appropriate to the dwelling type and each audit and all supporting documentation will be submitted to KHRC or DOE for pre-approval.

All dwelling units will have pre-inspection data entered into an individualized REM/Design building file to represent the dwelling and its energy consumption analysis. An Improvement Analysis report will prioritize the energy efficiency measures. Agencies are responsible for maintaining software licenses and are responsible for upgrading when prompted by KHRC. The current approved version is 12.96.

### 2.5.2 Data Entry

The existing conditions of the home shall be entered as completely and accurately as possible into the audit.

The appropriate climate zone will be selected.

The appropriate utility fuel rates will be selected. KHRC will provide an annual update of utility rates for the major fuel vendors in Kansas. Auditors will be expected to obtain local fuel rates which shall be updated at least annually.

Actual measured dimensions will be used to input data fields.

Existing libraries will be utilized when they match existing conditions. Custom libraries will be built within the software when necessary. Special attention will be paid to insulation values and insulations grades.

Mechanical equipment shall be modeled to reflect efficiency usage as identified by the model number and an appropriate reference manual. Estimations and assumptions can be used when actual data is unavailable.

Performance adjustments to equipment will not be utilized.

Temperature set points should be set at 70 degrees in the winter and 75 degrees in the summer.

Actual measured blower door test results will be used.

Default values for lights and appliances will be utilized in REM/Design with the exception of light bulbs and refrigerators. Refrigerator model numbers will be collected and entered into Energy Star's Refrigerator Calculator or Kouba-Cavallo's website to obtain the average annual kWh usage for that model. This usage amount will be entered into REM/Design when considering replacement.

Light bulb usage will be modeled as 60 watts per incandescent bulb for 3 hours per day.

After all characteristics of the home have been entered, the Quick Analysis of the dwelling should be reviewed for energy consumption.

### 2.5.3 Improvement Analysis

To get audit approval for any measure to be completed on the dwelling, it is necessary to use the Improvement Analysis portion of the software.

In the Improvement Analysis Tool, select all energy efficient improvement measures to consider. Ensure all proposed upgrades meet the minimum requirements set forth in the Kansas SWS Field Guide and are suitable for the dwelling.

Ensure all estimated measure costs for material and labor are accurate before running the report.

Ensure the life span of each measure is set to the approved value.

The SIR cutoff rank shall be set to 0 to show all SIRs even those below 1.

Measure Interactions shall be considered.

Incidental Repair Measure (IRM) costs must be made part of the overall cost for the Energy Conservation Measure (ECM) or group of measures that it's associated with. The ECM or group of ECM's must maintain an overall SIR of 1.0 or higher. For example, the cost of repairing a mobile home belly should be included with the cost of the mobile home belly insulation. If the belly insulation measure no longer passes because of the additional IRM cost, the IRM cost should be instead included in the whole house SIR to ensure it maintains an SIR of 1.0 or greater before proceeding with the repair. All whole-house SIR calculations require KHRC review.

Items are to be performed according to the priority ranking of SIR. In no case may an efficiency weatherization measure be installed that shows an SIR of less than 1.0. Measures with the highest SIR must be completed first. Installing a measure with a lower SIR without first installing all measures with greater SIRs is not allowed (see exception below\*). In other words, measures may not be skipped. Energy efficiency measures not on the Improvement Analysis or with an SIR value less than 1.0 are ineligible. Health and Safety items and General Heat Waste measures do not have to have audit approval.

All eligible weatherization measures must be proposed in the Improvement Analysis. Measures not feasible to install because the design, construction, or use of the dwelling may be omitted. Examples may include: client's refusal of drilling, active Knob and Tube wiring preventing the installation of insulation, or moisture issues preventing foundation wall draping. In these instances, the measure may be omitted and documentation provided in the client's file.

It should be noted that some measures approved by the Improvement Analysis may not be able to be completed if weatherization funds are expended. Subrecipients must also demonstrate good judgment in determining the appropriateness of some measures that show an SIR of 1.0 or above, assuring they manage to the average cost per unit, and balancing between providing more services to fewer households and providing appropriate services to more households. It is not permissible to omit core measures vital to the success of the weatherization job. Core measures include creating a thermal boundary by air sealing and insulating and addressing all Health and Safety measures.

### 2.5.4 Life Spans

The following life spans will be used in REM/Design to calculate SIR.

<b>Measures</b>	<b>Years of Life</b>
Windows and Doors	20
Insulation (which includes attic, walls, floors, foundations, and rim)	20
HVAC (includes boilers, furnaces (gas, electric, and heat pumps), A/C (central and window), and any other space heating systems)	16
Ductwork Insulation	10
Air infiltration (which includes top plane, sidewall, and any other infiltration measures)	15
Refrigerators	15
Water Heaters (both gas and electric)	12
Water heater Insulation Wrap	10
LED's	10
Showerheads and Aerators	5

### 2.5.5 Fuel Switching

K-WAP does not permit the general practice of non-renewable fuel switching when replacing furnaces/appliances. However, DOE does allow the changing or converting of a furnace/appliance using one fuel source to another on a limited, case-by-case basis. These approvals will only be granted when all related costs demonstrate the effectiveness of the fuel switch over the life of the measure. Agencies seeking fuel switching must request approval from KHRC and provide the site-specific energy audit for review. KHRC will review and submit the information to DOE for approval on a case-by-case basis.

## 2.6 ELIGIBLE MEASURES, CORE MEASURES, GENERAL HEAT WASTE MEASURES, AND INCIDENTAL REPAIRS

### 2.6.1 Eligible Measures

Prioritization of weatherization measures to be performed on a dwelling unit have been established per 10 CFR 440.21, Standards and Techniques for Weatherization. Energy audits will be conducted on each dwelling unit covered by the state's weatherization program. Weatherization measures approved in Kansas, as justified by an individualized REM/Design audit, may include:

- Diagnostic combustion appliance testing.
- Measures to reduce infiltration.
- General heat waste measures.
- Installation of a smart thermostat.
- Necessary repairs or replacement of primary heating unit.
- Installation of attic insulation up to R-38.
- Installation of dense-pack wall insulation.
- Installation of floor insulation up to R-30.
- Installation of interior or exterior storm windows over single-glazed, loose fitting primary windows.
- Installation of wire or fabric sunscreen.
- General cooling measures; including, air conditioning replacement.
- Installation of other measures necessary to protect installed weatherization materials.
- Necessary health and safety repairs.

- Installation of LED light bulbs
- Refrigerator replacement.
- Installation of primary windows and exterior grade doors.
- Necessary repairs or replacement of water heater.
- Installation of foundation wall and rim and band insulation up to R-19.
- Ductwork installation (eligible with certain grants only)
- Slab Edge insulation up to R-10.

### 2.6.2 Core Measures

Health and Safety Measures- Health and safety hazards which are necessary before, or because of, the installation of weatherization activities must be addressed.

Heating system safety and efficiency inspections and repair – All heating systems must be completely inspected at the pre-inspection. All unsafe or inoperable units must be made safe, removed, repaired, made operable, or replaced prior to any weatherization work.

Air Sealing Measures- Blower door guided envelope air sealing is required. Top plan air sealing shall occur on all weatherized homes. Trunk and boot sealing shall occur on all mobile homes. All major bypasses and key junctures shall be sealed according to ASHRAE 62.2-2016.

Thermal Boundaries – Thermal boundaries shall be aligned and in contact with the building envelope. Insulation levels shall be increased to the Kansas SWS Field Guide recommended levels if structurally allowable and audit approved.

Attic Insulation- Insulate attics to R-38 as allowable by the audit.

Sidewall Insulation – Dense pack wall cavities to R-13 or maximum structurally allowable as approved by the audit.

Knee walls- Insulate knee walls to R-19 or maximum structurally allowable as approved by the audit. Seal applicable key junctures in knee wall areas.

Foundation Insulation- If applicable, foundation walls should be insulated to a minimum R-19 as approved by the audit.

Floor Insulation- If applicable, framed floors should be insulated to R-30 or maximum structurally allowable as approved by the audit.

### 2.6.3 General Heat Waste Measures

General Heat Waste (GHW) reduction measures are weatherization related improvements that are generally considered cost effective and do not need justification in a site-specific energy audit. GHW measures are intended to be relatively low-cost items that can be quickly and easily installed. Total GHW measure costs, including labor, will not exceed \$250. The following GHW measures are presumed to be cost effective and their installation is permitted wherever they are appropriate and not already present. Auditors and crews should be diligent of circumstances that can reduce the cost-effectiveness of these measures.

- Water heater wrap (i.e., insulation blanket) (Unless prohibited by the manufacturer's warranty)

- Water heater pipe insulation (on the first six feet of hot water pipe exiting the water heater, in unconditioned areas)
- Faucet aerators
- Low-flow showerheads (2.0 gpm)
- Limited weather stripping and caulking to increase comfort (does not include major air sealing work, which should be guided by blower door testing)
- Replacement furnace or air conditioner filters
- Duct sealing and insulating when located outside the thermal boundary. When the duct work is leaky and/or uninsulated and is located outside the conditioned volume of the dwelling and not under existing insulation. Duct insulation shall have a minimum R-value of 8.
- Pipe insulation on water lines when located outside the thermal boundary
- CFL replacement of incandescent bulbs in permanent fixtures

LED lighting technology is not allowed as a GHW measure and must be individually audit approved.

#### 2.6.4 Incidental Repair Measure (IRM)

Incidental repairs are those materials and installation costs which are performed to protect or aid in the installation of an energy conservation measure and are part of the total allowable expenditure.

Incidental repair costs do not receive individual audit approval but are included in the total package cost of weatherization measures when calculating the SIR for the whole building. The additional IRM expenditure must be made part of the overall cost for the Energy Conservation Measure (ECM) or group of measures that it's associated with. The ECM or group of ECM's must maintain an overall SIR of 1.0 or higher. K-WAP will retain a maximum cap of \$500 per dwelling unit for incidental repairs. This \$500 limit is not an average, but the maximum which can be expended on each home for this category.

The subrecipients may exceed the \$500 limit, if certain requirements are met, by submitting a written waiver request to the KHRC/WAP staff for written approval. The written request must include the total amount to be expended and must include the REM/Design audit to ensure that the overall group of measures receives and SIR of 1+. The written request for a waiver can be submitted by e-mail as long as all pertinent information is submitted to KHRC/WAP staff for approval.

All incidental repair costs shall be documented as such in the client files and tied to an energy conservation measure.

A brief description of the work performed as an incidental repair must be included in the comments section of the energy audit measures list.

#### 2.6.5 Field Standards Waiver

Minor deviations from this Weatherization Manual or major deviations from the Kansas SWS Field Guide require a Field Standards Waiver from a KHRC Weatherization Program Technical Representative or Monitor prior to the expenditure of funds. An electronic or hard copy waiver documenting authorization will be forwarded and kept in the client's file.

For example, waivers may be granted to agencies to replace leaking water heaters or to exceed the Health and Safety Cost for furnace replacements.

Minor installation deviations from the Kansas SWS Field Guide may be authorized by subrecipients and inspection staff but must be sufficiently documented in the client file.

## 2.7 ENERGY CRISIS AND DISASTER RESPONSE PLAN

K-WAP allows a great deal of flexibility in its program under normal operation. K-WAP subrecipients may consider any household an emergency that has no working furnace or whose furnace is tested unsafe, or that demonstrates its energy costs constitute a high burden, or whose energy consumption is unusually high. Classification as an emergency enables a subrecipient to place that household at the top of the list for weatherization services.

During an energy crisis, such as one caused by rapid increases in fuel costs, subrecipients have the opportunity to use existing procedures to prioritize weatherization for households with no heating unit, households with unusually high energy costs, households with certain health and safety problems, or households with other emergencies such as extremely leaky homes.

As an emergency during an energy crisis, the K-WAP subrecipient may make emergency repairs, including furnace replacement and repair of serious air leaks, and schedule other needed repairs at a later date. If at all possible, the subrecipient should complete the emergency units within the current program year. If it is not possible, however, the State will work with the subrecipient agency to assure the work can be completed during the following program year.

The State will allow subrecipients to purchase or lease temporary heating sources for use in energy crises. Subrecipients may use program funds for storage of the units and to increase liability insurance, as needed. Subrecipients will be responsible for maintaining the safety of the units.

As needed, the State may redirect funds from T&TA to provide additional allowable measures required to meet an energy crisis.

### 2.7.1 Kansas General Disaster Response Plan (Reference WPN 12-7):

**Policy:** For weatherization purposes, a disaster is determined by a Presidential or Gubernatorial order declaring either a Federal or State Emergency. The crisis may be naturally occurring or man-made and generally will involve at least three phases: the crisis itself, the clean-up, and the rebuilding of the affected area. It is not uncommon for weatherization work to be suspended during the crisis and early clean-up phase until basic community services such as electricity, water, food and medical supply activities can be returned closer to normal.

The disaster time period may be from several days to a month or more and this period can have a critical impact on program operations.

This “General Disaster Response Plan” addresses the needs of the affected low-income clients and also takes into consideration the limited funds available in weatherization.

**Procedures:**

A General Disaster Response Plan will include:

- Contact and coordination with the appropriate disaster site leadership in charge to explain the role and resources that weatherization can provide;

- Availability and use of grantee and/or subrecipient staff, equipment and resources;
- Consideration for the preservation of subrecipient weatherization files, records, materials and equipment if they would be at risk.
- Notify A DOE Project Officer as soon as possible regarding the disaster: K-WAP is to contact DOE staff by telephone, then provide a follow-up in writing (email is fine). Discussion by telephone allows DOE staff to explore ideas and options that may be available using weatherization resources and begin to explore whether the currently approved State plan adequately addresses the circumstances and possible proposed actions.
- Assess circumstances, determine the need to develop and submit an Event-Specific Disaster Response Plan: Assess the needs of the affected subrecipients, and identify potential assistance available from other subrecipients in the network that may be willing to volunteer assistance.
- Verbal agreements within the scope of the grant can be made to clarify details and expedite early action during the disaster and early stages of clean-up. The grantee shall follow-up with DOE staff on verbal understandings and agreements in writing (email) promptly afterward.

### 2.7.2 Event Specific Disaster Response Plan

The “Event Specific Disaster Response Plan” will provide as much of the applicable reporting element information upfront as available and establish the estimated timeframe and end-date for DOE assistance.

It will clearly specify when the reporting will be provided to DOE as part of the proposed disaster plan (i.e., 30 days after the approved end-date for DOE weatherization assistance.) If an extension of the end-date is requested, the request will indicate the circumstances and provide updated reporting information.

Examples of Eligible Activities:

1. **Reweathering** - The Program Regulation allows any previously weatherized home “damaged by fire, flood or act of God” to be re-weatherized, without regard to date of weatherization, where local authorities deem the dwelling salvageable as well as habitable and if the damage to materials is not covered by insurance or some other form of compensation.
2. **Health and Safety** - In the normal course of weatherization or re-weatherization, the cost of eliminating health and safety hazards, elimination of which is necessary before the installation of weatherization materials or the result of weatherization activities, is allowable. To the extent that the services are in support of eligible weatherization work, such expenditure would be allowable. For example, debris removal at a dwelling unit so that the unit can be weatherized would be an allowable cost. Please note that the average cost per dwelling unit limit continues to apply.
3. **[Incidental Repairs](#)** – In the normal course of weatherization or re-weatherization, the cost of incidental repair costs to protect or aid in the installation of weatherization materials and are part of the total allowable expenditure. All incidental repair costs shall be documented as such in the client files and be tied to an energy conservation measure or group of measures. The overall cost must receive and SIR of 1+. Incidental repair costs may not exceed a maximum of \$500 per dwelling unit for labor and materials.
  - a. The subrecipients may exceed the \$500 limit, if certain requirements are met, by submitting a written waiver request to the KHRC/WAP staff for written approval. The

written request must include the total amount to be expended and must include the REM/Design audit to ensure that the overall group of measures receives and SIR of 1+. The written request for a waiver can be submitted by e-mail as long as all pertinent information is submitted to KHRC/WAP staff for approval.

4. Protection of DOE investment- Weatherization personnel can be paid from DOE funds to perform functions related to protecting the DOE investment. Such activities include: securing weatherization materials, tools, equipment, weatherization vehicles, or protection of subrecipient weatherization files, records and the like during the initial phase of the disaster response. Using DOE funds to pay for weatherization personnel to perform relief work in the community as a result of a disaster is not allowable.
5. Local agencies may use weatherization vehicles and/or equipment to help assist in disaster relief provided the WAP is reimbursed according to the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards 2 CFR 200.

Priority – It would be permissible to consider households located in the disaster area, as a priority as long as the households are eligible and meet one of the priorities established in regulation and are free and clear of any insurance claim or other form of compensation resulting from damage incurred from the disaster. Inclusion of these households as a priority must be outlined in the Disaster Response Plan.

#### Summary Statement

1. Planning and Reporting Elements: If the General Disaster Response Plan is utilized and/or an Event-Specific Disaster Response Plan is approved, the grantee will report to the DOE Project Officer on the use of Weatherization resources and the DOE grant will include, at a minimum:
2. A description of the disaster including the counties/local weatherization agencies affected. It will include the State emergency management website that tracks disasters;
3. A description of the types of DOE weatherization assistance, the scope and costs of weatherization activities performed.
4. The timeframe of the disaster. The date it started, when it was declared a disaster, and the (proposed or approved) end-date for DOE weatherization assistance;
5. An explanation of how disaster-related costs are being tracked by type of activity and summary of DOE disaster-related expenditures and programmatic reporting information. For example, the number of homes and persons assisted under the Disaster Response Plan provisions;
6. Any other applicable items as determined by KHRC or DOE.

Reporting will be sent to the DOE Project Officer by email.

## 3 HEALTH AND SAFETY PLAN

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### 3.1 HEALTH AND SAFETY

The K-WAP stresses the importance of improved client health and safety as one of the primary outcomes of weatherization. The goal for K-WAP is to implement cost-effective weatherization procedures to conserve energy and to assess and correct weatherization related Health and Safety (H&S) hazards for the well-being of clients, their dwellings, and weatherization personnel. With more advanced diagnostics and installation techniques utilized in the K-WAP, it is increasingly necessary to take steps to ensure that program measures do not cause or exacerbate health and safety problems for workers or clients.

Health and safety measures are allowed where, cumulatively, they do not exceed reasonable costs, as outlined in the Health and Safety Plan approved by DOE annually in the State Plan, or as approved in individual agency budgets. Health and Safety funds are to remedy health and safety hazards which are necessary before, or because of, the installation of weatherization measures. Health and Safety measures are limited to those hazards that are related to energy efficiency and conservation. Health and Safety measures are allowed to be conducted only where energy efficiency measures are identified for installation.

The Health and Safety Plan in the approved State Plan, the Standardized Work Specifications (SWS), and this section will detail the problems to review, the hazards from various sources, and their interactions with other factors.

#### 3.1.1 Health and Safety Expenditures

Health and Safety funds are to remedy health and safety hazards which are necessary before, or because of, the installation of weatherization materials. These funds will be expended by subrecipients in direct weatherization activities. Expenses charged as Health and Safety measures do not require audit approval and are not to be included as part of the per unit average. Agencies must submit H&S budgets for pre-approval to KHRC. The average DOE H&S cost is set annually and is found in the annual DOE State Plan. State review and approval will be required for any subrecipient exceeding this set amount.

The rationale for performing each H&S measure and its relationship to the effective weatherization of the home must be clearly evident to program staff. Items requiring explanation must be clearly documented in the client file. Deferrals may be necessary if health and safety issues cannot be adequately addressed through this guidance or with the funds available. See section on [Deferral Policy](#).

There are some instances where, depending on circumstances, the measure can be considered either a health and safety measure OR an energy conservation measure (e.g., furnaces). In those instances where the measure has a cost-effective savings-to-investment ratio (SIR) of one (1) or greater, the measure shall be treated as a weatherization efficiency measure.

Incidental repairs are those repairs necessary for the effective performance or preservation of weatherization materials and are not Health and Safety measures and accordingly would not be charged as such. See section on [Incidental Repairs](#). Minor wall and roof repairs to preserves installed insulation shall be deemed an IRM, and not H&S. Minor repairs are those that can be corrected with \$500 or less.

Subrecipient agencies must report health and safety material and labor costs separately on the energy audit measures list. The cost of Lead Safe Work Practices (LSWP) is to be tracked and reported separately from the energy conservation measure requiring it and is an allowed H&S expenditure. Total health and safety costs and percentages are to be tracked and managed by the subrecipient.

### 3.1.2 Client Health and Safety Education

K-WAP recognizes the connection between weatherization work and the health of the occupants. Partnerships have been and will continue to be developed between K-WAP and other State and national partners.

Continuing education will ensure that there is consistent education and applied prevention techniques used in each household to minimize any negative health outcomes that could result as an impact of the weatherization activities on the families we serve.

Client education has been provided over the years by different methods in each area of the State, ranging from detailed discussions with clients during pre- and post-inspections to access to program-related publications. This includes, but is not limited to: lead-based paint, asbestos, combustion safety and venting, carbon monoxide, mold and moisture, ventilation, radon, structure hazards, and other hazards.

As the program has become more technology-oriented, State staff encourages subrecipient staff to use the technology to demonstrate energy-saving techniques and to explain the outcome of poor energy habits, bad energy decisions, and potential household hazards.

### 3.1.3 Client Health and Safety

K-WAP staff and contractors will be required to take all reasonable precautions against performing work on homes that will subject workers or clients to health and safety risks. See section on Occupant Health and Safety Concerns and Conditions.

All health and safety precautions found in this manual will be utilized to minimize health and safety threats to weatherization clients.

### 3.1.4 Crew and Contractor Health and Safety

Weatherization workers must be able to perform weatherization inspections and work without undue threats or conditions which jeopardize their or the client's health and safety. Refer to the [Deferral Policy](#) Section for a non-exhaustive list of conditions which may constitute such undue threats. Additionally, all health and safety precautions found in this manual will be utilized to minimize health and safety threats to weatherization workers.

### 3.1.5 Hazard Identification and Notification

A H&S assessment must be performed to identify hazards in the home. Where hazards are identified, appropriate testing must be performed when required by this guidance. When the hazard will lead to deferral, the client/landlord/property manager must be informed in writing of the hazard, and any test results, in accordance with the standard weatherization deferral policy.

### 3.2 DEFERRAL POLICY

Deferral may be necessary if health and safety issues cannot be adequately addressed through this 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. In the judgment of the subrecipients, which include crews and contractors, any conditions that exist, which may endanger the health and/or safety of the workers or occupants, should be deferred until the conditions are corrected. Deferral may also be necessary where occupants are uncooperative, abusive, or threatening. Crews and contractors are expected to pursue all reasonable options on behalf of the client.

Subrecipients will develop guidelines and a standardized form for such situations\*. The form will include the client's name and address, dates of the audit/assessment and when the client was informed, a clear description of the problem, conditions under which weatherization could continue, the responsibility of all parties involved, and the client(s) signature(s) indicating that they understand and have been informed of their rights and options and have the opportunity to appeal.

\*Disclaimer notices are currently in place for: lead paint, mold, asbestos, hazard identification, occupant pre-existing or potential health conditions, and radon.

Deferral conditions may include:

- The client has known health conditions that prohibit the installation of insulation and other weatherization materials.
- The building structure or its mechanical systems, including electrical and plumbing, are in such a state of disrepair that failure is imminent and the conditions cannot be resolved cost-effectively.
- The house has sewage or other sanitary problems that would further endanger the client and weatherization installers if weatherization work were performed.
- The house has been condemned or electrical, heating, plumbing, or other equipment has been "red tagged" by local or State building officials or utilities and cannot be remedied by weatherization funds.
- Moisture problems have developed signs of mold.
- Dangerous conditions exist due to high carbon monoxide levels in combustion appliances, and cannot be resolved under existing Health and Safety measures.
- The client is uncooperative, abusive, or threatening to the crew, subcontractors, auditors, inspectors, or others who must work on or visit the house.
- The extent and condition of lead-based paint in the house would potentially create further health and safety hazards.
- If, in the judgment of the energy auditor, any condition exists which may endanger the health and/or safety of the work crew or subcontractor, the work should not proceed until the condition is corrected.
- The property has vermiculite insulation that will be disturbed.
- The property has suspected asbestos containing materials in less than good condition or where the material is non-intact or where the material may be disturbed.
- The utilities to the property have been disconnected by the utility company.
- The combined price of required H&S measures exceeds the average H&S expenditure to the extent that the agency cannot balance the expenditure to maintain the required H&S

percentage. In this instance, the agency may defer the home until additional funds are located to lower the expenditure to within the average.

- The property is currently listed for sale and/or the eligible occupant will be moving.

### 3.3 HEALTH AND SAFETY ISSUES OR POTENTIAL HAZARD CONSIDERATIONS

#### 3.3.1 Air Conditioning and Heating Systems

All mechanical systems will be assessed following the policies and procedures outlined in the [Mechanical Systems](#) section.

Unsafe or non-functioning primary units must be repaired or replaced before weatherization can proceed, or deferral is required.

Unsafe or non-functioning secondary heating systems, including unvented space heaters must be repaired, removed, or rendered inoperable, or deferral is required. Replacement or installation of secondary units is not allowed.

Cooling system shall only be replaced as an ECM. No H&S cooling systems are permitted.

#### 3.3.2 Asbestos

General asbestos removal is not approved as a Health and Safety weatherization cost with federal funds. Major asbestos problems will be referred to the appropriate State agency and/or the Environmental Protection Agency (EPA).

##### 3.3.2.1 *Asbestos in siding, walls, ceilings, etc.*

Where suspected Asbestos Containing Material (ACM) is identified, precautions must be taken not to disturb the material. The ACM's overall condition and potential for disturbing the ACM will be evaluated. Where the material condition is good and intact at time of inspection and there is no risk of disturbing the material, a blower test can be conducted. Where the material is in less than good condition, the material is non-intact, or the material may be disturbed, the home will be deferred until the material is deemed non-asbestos containing, removed, or encapsulated by a certified asbestos professional.

The existence of slate siding, or other suspected asbestos containing siding, that is in good condition does not require deferral nor prevents the installation of wall insulation. 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 siding. Slate type siding should not be cut or drilled. The use of PPEs and safe practices when working around suspected ACMs as outlined in the SWS's are recommended. Insulating through the interior of the home can be another option. General abatement of siding or replacement with new siding is not an allowable H&S cost.

##### 3.3.2.2 *Asbestos in vermiculite*

When vermiculite is present, the home will be deferred until the removal of vermiculite by a certified asbestos professional is completed. Testing results are not accepted by KWAP. DOE/LIEAP funds cannot be used for removal or testing.

Clients will be instructed to not disturb the vermiculite and asbestos safety information will be provided.

The deferral language will provide information in writing describing that in order for weatherization to proceed there must be documentation that a licensed professional removed the vermiculite.

#### *3.3.2.3 Asbestos in on pipes, furnaces, other small covered surfaces*

Suspected asbestos containing material present on pipes, furnaces, or other small covered surfaces, shall be assumed to contain asbestos, unless testing determines otherwise. The material's overall condition and the potential for disturbing the material will be evaluated. Where the material condition is good and intact at time of inspection and there is no risk of disturbing the material, weatherization work should proceed. Clients and workers will be instructed not to disturb the material. Where the material is in less than good condition, the material is non-intact, or the material may be disturbed, the home will be deferred until the material is deemed non-asbestos containing or removed or encapsulated by a certified asbestos professional. DOE/LIEAP funds cannot be used for removal, encapsulation, or testing.

Clients will be instructed to not disturb the suspected ACMs and asbestos safety information will be provided. When non-federal funds are used for testing, the test results will be shared in writing with the client.

When deferral is necessary, the client will be informed in writing of the observed condition triggering the deferral and the actions necessary in order for weatherization to commence, including the requirement that documentation of work performed must be by a licensed asbestos professional.

#### **3.3.3 Biologicals and Unsanitary Conditions**

Removal of mold, odors, viruses, bacteria, unsanitary conditions (including raw sewage), and rotting wood is not a Weatherization responsibility; however, program workers frequently encounter these conditions. DOE/LIEAP funds may not be used to correct the condition and the home may need to be deferred in cases where conditions in the home pose a health risk to occupants and /or weatherization workers. Caution should be taken when selecting air ventilation rates for dwellings with these problems. Since some of these conditions are related to moisture, procedures that allow local agencies to assess moisture conditions as a part of the initial audit procedure and treat them as part of the weatherization work have been established; see [Mold and Moisture](#). If necessary, weatherization services may need to be delayed until the problem can be referred to another agency that can take remedial action.

#### **3.3.4 Building Structure and Roofing**

Building rehabilitation is beyond the scope of the Weatherization Assistance Program; however, program workers frequently encounter homes in poor structural condition. Dwellings whose structural integrity is in question should be referred to housing rehabilitation programs where appropriate. Weatherization services may need to be delayed until the dwelling can be made safe for crews and occupants. Incidental repairs necessary for the effective performance or preservation of weatherization materials are allowed. Examples of these limited repairs include sealing minor roof leaks to preserve new attic insulation and repairing water-damaged flooring as part of replacing a water heater. Minor repairs are those repairs that can be corrected with a maximum \$500 incidental repair. All minor repairs must meet and follow the definition and requirement of incidental repairs.

### 3.3.5 Code Compliance

The 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 the specific code requirements with reference to the weatherization measure(s) that triggered the code compliance issue in the client file. State and local (or jurisdiction having authority) codes must be followed while installing weatherization measures. Condemned properties and properties where “red tagged” or health and safety conditions exist that cannot be corrected under this guidance must be deferred. Commonly triggered code compliance issues for KWAP include:

- flue liners or resizing of water heater flues when a weatherization installed furnace orphans the water heater. Flue liners and flue corrections are allowable H&S items.
- Federal Pacific breaker boxes are present in Kansas homes and where mechanical equipment replacements are required, this unsafe breaker box must be replaced. This is an allowable H&S expense, but typically will require additional non-federal funding.
- The correction of all mechanical code violations may be required when pulling a mechanical permit for the installation of new mechanical equipment. This may include installing a gas line drip leg on water heaters when installing a new furnace. The correction of code issues when required, is an allowable H&S expense.
- Electrical code compliance work is allowed when required when installing new ventilation equipment.

### 3.3.6 Combustion Gases

All combustion space and water heating appliances will be assessed at both the initial audit and at the post inspection. The most recently approved mechanical inspection forms available will be utilized to record and document the results. Separate mechanical inspections forms will be used for pre- and post-inspections. Separate mechanical forms will be used for each mechanical system.

Proper venting to the outside for combustion appliances, including gas dryers and refrigerators, furnaces, vented space heaters, and water heaters is required. Also see [Gas Ovens, Stovetops, Ranges](#).

When testing indicates a performance problem, venting corrections will be made. Prescriptive correction of preexisting venting code compliance issues, or combustion air calculations, are not eligible H&S measures unless a weatherization installed measure triggers code compliance requirements.

When correction of preexisting code compliance issues is triggered and paid for with WAP funds, cite the specific code requirements with reference to the weatherization measure(s) that triggered the code compliance issue in the client file. Follow the Kansas SWS Field Guide for testing procedures and action levels.

Follow section [Mechanical Systems](#) Section to assess combustion equipment and determine repair or replacement procedures.

Combustion appliances must be deemed safe before weatherization measures are installed and must be documented as safe at the completion of the weatherization work. This requirement applies year-round regardless of whether the equipment is in use.

All naturally drafting combustion equipment within the pressure boundary will be tested with the Combustion Appliance Zone (CAZ) in the worst-case depressurization state. This is required at the initial audit and final inspection and highly encouraged on any day when work have been done that could affect draft (i.e. air sealing, flue work, adding ventilation).

Fireplaces can present special hazards that may be affected by weatherization. Fireplaces, as well as all solid fuel appliances, should be inspected for visual evidence of soot on the walls, mantel, or ceiling, or creosote staining near the chimney/flue pipe. These can indicate combustion/drafting issues. Assess whether the fireplace is a primary heating source, a backup heating source, or merely decorative in nature. Operational fireplaces used for primary heating should have the CAZ zone tested under worst case conditions. CAZ depressurization exceeding 5 pascals in the space having the fireplace should have pressure imbalances corrected, additional combustion air added, or the fireplace disabled. "Ballooning" the chimney of secondary or decorative fireplaces is an encouraged air sealing procedure.

When a fireplace is used for primary heating, other combustion appliances, such as gas water heaters, should be tested under simulated worst-case conditions. A blower door can be set to run at 300 CFM (depressurization) to mimic the airflow dynamics likely when the fireplace is in use.

Crew based agencies will develop daily test out procedures to ensure safe operation before leaving the home on any day when work has been done that could affect draft (e.g., tightening the home, adding exhaust ventilation).

### 3.3.7 Electrical

The two- primary energy related health and safety electrical concerns are insulating homes that contain knob-and-tube wiring and identifying overloaded electrical circuits. Knob-and-tube wiring located in a wall cavity or exposed on an attic floor was intended by code to have free air movement to cool the wire when it is carrying an electric current. Laboratory tests have shown that retrofitting thermal insulation around electric wiring can cause it to overheat, resulting in a fire hazard. For this reason, the installation of insulation around live knob and tube wiring should not be performed. Sidewalls that contain live knob and tube wiring are not to be blown with insulation. In attics, a reasonable cost of rewiring live knob and tube should be included in the cost of the attic insulation for audit approval. The cost of rewiring will be charged with the cost of the energy conservation measure of attic insulation if audit approved. If the cost of rewiring is prohibitive, the cost of attic insulation shall be run independently and should be valleyed or dammed to prevent covering live knob and tube. Subrecipients are to abide by more stringent applicable codes in jurisdictions where the work is being performed.

Non-contact voltage detection testing is required on knob and tube wiring.

Serious electrical hazards exist when gross overloads are present. Should auditors and crews find such existing problems, they should notify the owner. Weatherization measures that involve the installation of new equipment such as air conditioners, heat pumps, or electric water heaters can exacerbate previously marginal overload problems to hazardous levels. The problem should also be noted in the client file. To the extent that these problems prevent adequate weatherization, the agency should consider repairing them on a case-by-case basis. Deferral may be necessary.

When the H&S of the occupant or worker(s) is at risk, minor repairs are allowed when necessary for weatherization measures. Minor repairs are those repairs that can be corrected with a maximum \$500

repair. Electrical upgrades or repairs which are a direct component of an energy conservation measure must be charged as part of the energy conservation measure and cannot be charged to the health and safety budget category. Electrical upgrades or repairs which are part of a H&S furnace, H&S water heater, or H&S ventilation system (ASHRAE) must be charged as part of the associated H&S measure.

**3.3.8 Formaldehyde, Volatile Organic Compounds (VOCs), Flammable Liquids and other Air Pollutants**  
Formaldehyde vapors may be slowly released by some new carpets, waferboard, plywood, etc. VOCs are also emitted by some household cleaning agents. Ventilation rates will be taken into consideration in dwellings with VOC or other air pollutant issues.

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.

### **3.3.9 Fuel Leaks**

Exposed gas lines will be inspected using an electronic combustion gas detector from the utility coupling into and throughout the home. Gas leaks should be verified with a soap solution and marked for repair. When a gas leak is found on the utility side of service, the client must contact the utility service before work may proceed. Fuel leaks that are the responsibility of the client must be repaired before weatherizing the unit. Fixing minor fuel leaks inside the home are allowable H&S expenses.

### **3.3.10 Gas Ovens, Stovetops, Ranges**

Replacement of gas ovens, stovetops, and ranges is not allowed.

Gas ovens will be tested for CO following BPI's test procedures. If units exceed 450 ppm air-free at steady state, a clean and tune will be conducted. Clients will be notified if units do not improve after cleaning and tuning and a CO alarm will be installed.

Gas ranges will visually inspected. Clients will be notified that a clean and tune or repair is recommended if the flame has any discoloration, flame impingement, an irregular pattern, or if the burners are visibly dirty, corroded, or bent.

Client education will be provided on how to minimize CO exposure such as running exhaust fans when cooking and the importance of keeping the oven and burners clean.

### **3.3.11 Hazardous Material Disposal (Lead, Refrigerant, Asbestos, Mercury, including CFLs/Fluorescents)**

All clients will receive a pre-renovation lead pamphlet.

Clients will be instructed to not disturb suspected asbestos containing material and asbestos safety information will be provided in writing if suspected ACM's are present.

Clients will be informed in writing of hazards associated with hazardous waste materials being handled in the home. 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. Contract language will reflect this requirement.

### **3.3.12 Injury Prevention of Occupants and Weatherization Workers**

Minor repairs to stairs, steps, railings, etc., are only allowed incidental repairs under the program if necessary to complete the weatherization work. For example, broken steps to the basement where the furnace is located may be repaired if necessary in order to complete furnace work. Items not necessary

for the installation of a weatherization measure are not allowed. Minor repairs made to remedy the issues must meet the definition of incidental repairs and will be charged as incidental repairs rather than H&S.

### 3.3.13 Lead Based Paint

All weatherization auditors, inspectors, field monitors, agency crew members, general weatherization contractors and their crew members must attend and successfully complete a Kansas Department of Health and Environment (KDHE) approved Lead Safe Work Practice Training course and fulfill KDHE requirements to become Certified Renovators. Work must follow KDHE's Renovation, Repair, and Painting Program (RRP) when working in pre-1978 housing unless KDHE approved testing confirms the work area to be lead free.

All general weatherization contractors and agency crews will be responsible for complying with the Lead Based Paint Renovation, Repair, and Painting Rule (RRP) as enforced by KDHE in Kansas. Agencies with crews and weatherization contractors must be KDHE Licensed Renovation Firms.

RRP and Kansas weatherization requires all licensed firms to employ a Certified Renovator who is registered with the KDHE. Weatherization jobs will have a designated Certified Renovator on each job site at all times during weatherization activities. The Certified Renovator will document that RRP requirements were followed. Agency crews will include this documentation in the client file. Contractors are responsible to KDHE for completing and retaining proper documentation. Contractors, and agency crews, will provide a signed Lead Safe Work Practices Declaration form with the certified renovator's signature for the client file for all weatherization jobs. A copy of this documentation is required in the client file.

Only those costs directly associated with the lead safe practices for surfaces directly disturbed during weatherization activities are allowable H&S expenditures.

All client files will have a lead pamphlet delivery declaration. The Lead Safe Work Practices Declaration form with the certified renovator's signature is also required in the client file.

### 3.3.14 Mold and Moisture: (including but not limited to: drainage, gutters, down spouts, extensions, flashing, sump pumps, dehumidifiers, landscape, leaking roofs, vapor retarders, moisture barriers, etc.)

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 measure. Repairs not directly necessary for the installation of a ECM or H&S item is not allowed. Repair costs must be included with the associated weatherization measure.

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 measure. Source control is independent of latent damage and related repairs. Source control includes but is not limited to: gutters, down spouts, extensions, flashing, sump pumps, minor dirt work for drainage, and landscaping. The installation of dehumidifiers is typically beyond the scope of weatherization and requires a field waiver from the grantee. Major drainage issues are beyond the scope of the program. Source control is allowable only as they relate to mold and moisture creating conditions.

Ground moisture barriers will be installed in accordance with the approved Kansas SWS Field Guide. Ground moisture barriers will be installed over exposed dirt in enclosed, unvented crawlspaces/basements. Standing water, or evidence of previous bulk water intrusion, may prohibit ground moisture barrier installation.

Mold cleanup or testing is not an allowable Health and Safety 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 and cannot be charged to the H&S budget category.

Where severe mold and moisture issues cannot be addressed, deferral is required.

Auditors will complete a mold assessment and release form for each home. Where mold or moisture issues are identified, clients will receive information concerning the issue and will sign the assessment form.

When source moisture problems are identified, clients will be provided information on them. For example, the importance of cleaning and maintaining drainage systems such as gutters, or how proper landscape design and site drainage impacts moisture control.

#### 3.3.15 Pests

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 health and safety concern for workers. Screening of windows and points of access is allowed to prevent intrusion. Incorporating pest exclusion into air sealing practices to prevent intrusion is allowed as part of the air sealing ECM. The use of harsh chemicals is to be avoided.

Discretion to defer homes based on pests is left up to the individual auditor and work crews. Auditors are instructed to use common sense to assess the presence and degree of infestation and associated risks. Unsafe or unsanitary conditions are allowable deferral conditions.

#### 3.3.16 Radon

Radon testing and mitigation is not an allowable activity under the weatherization program. However, since radon may be present in all Kansas homes, precautionary measures to reduce the possibility of making radon issues worse are allowable H&S expenditures. Whenever site conditions permit, exposed dirt floors within the pressure/thermal boundary must be covered with an appropriately installed and sealed vapor barrier. Other precautions may include, but are not limited to, sealing any observed floor and/or foundation penetrations, installing a cover over open sump pits, or air sealing unconditioned cellars or crude basements from the living space.

All clients will be provided EPA's *A Citizen's Guide to Radon* and will be required to sign off on a Radon Informed Consent Form.

All client files will have a signed Radon Informed Consent Form. A sample of this form is available here: <http://www.kshousingcorp.org/more-program-information.aspx>

Auditors, assessors, and inspectors will be familiar with the EPA's *A Citizen's Guide to Radon* and will be able to discuss it with clients. They will also know the precautionary measures that may be helpful.

### 3.3.17 Safety Devices: Smoke and Carbon Monoxide Alarms, Fire Extinguishers

Smoke Alarms: Where alarms are not present or are inoperable, one UL-217 listed smoke alarm will be installed outside sleeping areas and on each habitable floor within every weatherized home. Alarms shall have non-removable, non-replaceable 10- year lithium batteries.

Carbon Monoxide Alarms: Where alarms are not present or are inoperable, one CO alarm will be installed outside the primary sleeping area and on each habitable floor within every weatherized home. Alarms shall be sealed lithium battery unit.

Fire Extinguishers: Fire extinguishers are not an allowable H&S measure.

Existing alarms will be tested for operation and checked for remaining life. New installed alarms will be tested to verify operation.

The Kansas SWS Field Guide provides instruction on alarm installation.

Where alarms are installed, clients will be provided with verbal and written information on the use of the devices.

### 3.3.18 Occupant Health and Safety Concerns and Conditions

K-WAP staff and contractors will be required to take all reasonable precautions against performing work on homes that will subject workers or clients to health and safety risks.

Before work begins on the residence, the agency/contractor must take into consideration the health concerns of each occupant, the condition of the dwelling, and the possible effect of work to be performed on any particular health or medical condition of the occupants.

Subrecipients will provide a "Occupant Pre-Existing or Potential Health Conditions" form to the client which explains that some weatherization measures create dust, smells, or other conditions that may aggravate certain health conditions in some individuals. The client will then have the opportunity to self-identify any pre-existing or potential health concerns that may be aggravated by weatherization services.

A sample of this form is available here: <http://www.kshousingcorp.org/more-program-information.aspx>

Agencies, and contractors, are to take into account the client's concerns to the extent feasible to minimize health risks, such as scheduling weatherization work when the at-risk occupants aren't present. It is the responsibility of the occupants to take the appropriate safety precautions to protect themselves and notify weatherization workers in advance of any health risks they may have. Clients will be provided a point of contact, in writing, so that the client can inform the subrecipient of any new or developing health conditions. Failure or the inability to take appropriate actions must result in deferral.

### 3.3.19 Ventilation and Indoor Air Quality

DOE: For all DOE funded homes, ASHRAE 62.2-2016 minimum ventilation standards are required to be met to the fullest extent possible and are allowable Health and Safety costs. Weatherization auditors/inspectors are required to received training on ASHRAE 62.2 evaluation, fan flow, and post weatherization testing to ensure compliance. Additional ventilation will be added or existing ventilation modified where required. When installing a new fan to meet whole-house ventilation requirements, actions will be taken to prevent zonal pressure differences greater than 3 pascals across the closed door.

The KHRC provided ASHRAE 62.2-2016 spreadsheet or the ASHRAE 62.2-2016 calculator from the Residential Energy Dynamics (RED) website will be utilized. Client files will contain ASHRAE testing and verification records.

Clients will be provided information on the function, use, and maintenance (including location of service switch and cleaning instructions) of ventilation systems and components. Equipment manuals will be left with the client. Clients will receive a disclaimer that ASHRAE 62.2 does not account for high polluting sources or guarantee indoor air quality.

LIEAP: ASHRAE 62.2–2016 ventilation compliance is allowable but not required for LIEAP. The minimum standard for non-DOE funding sources is ASHRAE 62-1989. A building tightness limit (BTL) will be calculated for all non-DOE funded homes and included in the client file. If the measured infiltration rate is below the calculated BTL, ASHRAE 62.2-2016 is triggered and must be applied to the fullest extent possible.

### 3.3.20 Window and Door Replacement, Window Guards

Replacement, repair, or installation is not an allowable Health and Safety cost but may be allowed as an incidental repair or an efficiency measure if cost justified.

### 3.3.21 Worker Safety (OSHA, etc.)

Because of the wide range of activities involved in weatherizing a house, ensuring crew health and safety requires a broad knowledge of the appropriate safety requirements. Some of these requirements include, but are not limited to: respirator protection, techniques for safely lifting heavy objects, electrical equipment safety, ladder safety, and general worker protection. OSHA standards should be consulted for further details.

Local agencies and contractors must comply with Occupational Safety and Health Administration (OSHA) requirements in all weatherization activities. Costs for subrecipients to comply with OSHA requirements may be charged to program support as tools and equipment. Safe work practices are verified during in-progress monitoring. In-progress monitoring will occur during regularly scheduled field monitoring, as feasible.

All Subrecipients and contractors must maintain compliance with the current OSHA Hazard Communication Standard, including on-site organized Safety Data Sheets (SDS) (formerly called MSDS). A copy of a product's Safety Data Sheet (SDS) shall be maintained in each warehouse at a designated location. SDS books shall also be maintained in each agency crew vehicle. Employees must have access to the information in the SDS books.

## 4 FORMS AND SAMPLE DOCUMENTS

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Forms and sample documents referenced in this manual, and other useful tools, can be found on KHRC's website at:

<http://www.kshousingcorp.org/more-program-information.aspx>

From time to time, forms and sample documents may be added, deleted, amended and/or revised to reflect changes in State or Federal regulations, advances in technology, and/or innovative approaches to weatherization. Subrecipients are encouraged to check this website frequently for any changes. KHRC will notify subrecipients of any major changes.

## 5 ACRONYMS

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ACPU	Average Cost Per Unit
ANSI	American National Standards Institute, Inc.
ASHRAE	American Society of Heating , Refrigeration and Air Conditioning Engineers
ASTM	American Society for Testing and Materials
BTU	British Thermal Unit
BWR	Building Weatherization Report
CAA	Community Action Agency
CFDA	Catalog of Federal Domestic Assistance
CFL	Compact Fluorescent Lamp
CFR	Code of Federal Regulations
CPA	Certified Public Accountant
DOE	Department of Energy
EPA	Environmental Protection Agency
FAC	Federal Audit Clearinghouse
FAIN	Federal Award Identification Number
FAR	Federal Acquisition Regulation
GAAP	Generally Accepted Accounting Principles
GPM	Gallons per minute
H&S	Health and Safety
HUD	U.S. Department of Urban Housing and Development
HVAC	Heating Ventilation and Air-Conditioning
HWSS	Housing with Supportive Services (Division of KHRC)
IAQ	Indoor Air Quality
IRM	Incidental Repair Measure
K-WAP	Kansas Weatherization Assistance Program
KDCF	Kansas Department of Children and Families
KDHE	Kansas Department of Health and Environment's
KHRC	Kansas Housing Resources Corporation
LSW(P)	Lead Safe Work Practices
LIEAP or LIHEAP	Low Income Home Energy Assistance Program
MSDS	Material Safety Data Sheets
NASCSP	National Association for State Community Services
NHPA	National Historic Preservation Act
OMB	Office of Management and Budget
OSHA	Occupational Safety and Health Administration

PII	Personally Identifiable Information
PO	Project Officer of Federal Award
POI	Pollution Occurrence Insurance
PTE	Pass-through Entity
QCI	Quality Control Inspector
RFP	Request For Proposal
RRP	Lead Based Pain Renovation, Repair, and Painting Final Rule
SAM	System for Award Management
SHPO	State Historic Preservation Office
SIR	Savings Investment Ratio
SPF	Spray Polyurethane Foam
SSI	Supplemental Security Income
SWS	Standard Work Specifications
T&TA	Training and Technical Assistance
TANF	Temporary Assistance for Needy Families
USDA	United States Department of Agriculture
VOC	Volatile Organic Compounds
WAP	Weatherization Assistance Program
WAPTAC	Weatherization Assistance Program Technical Assistance Center
WMS	Weatherization Management System
WPN	Weatherization Program Notice

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