

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0007948		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address State of Rhode Island 57 Howard Avenue Cranston, RI 029200000	4. Program/Project Start Date 07/01/2018		
	5. Completion Date 06/30/2021		

SECTION A - BUDGET SUMMARY

Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. DOE 2018/2019/2020 WAP Formula Funds	81.042	\$ 1,107,439.00		\$ 4,170,707.00		\$ 5,278,146.00
2. STATE			\$ 0.00		\$ 0.00	\$ 0.00
3.						
4.						
5. TOTAL		\$ 1,107,439.00	\$ 0.00	\$ 4,170,707.00	\$ 0.00	\$ 5,278,146.00

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) GRANTEE ADMINISTRA TION	(2) SUBGRANTE E ADMINISTRA	(3) GRANTEE T&TA	(4) SUBGRANTE E T&TA	
a. Personnel	\$ 116,359.00	\$ 0.00	\$ 109,798.00	\$ 0.00	\$ 226,157.00
b. Fringe Benefits	\$ 62,089.00	\$ 0.00	\$ 67,653.00	\$ 0.00	\$ 129,742.00
c. Travel	\$ 7,500.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 7,500.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 4,733.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 4,733.00
f. Contract	\$ 11,173.00	\$ 208,536.00	\$ 85,000.00	\$ 398,937.00	\$ 4,903,333.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 6,681.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 6,681.00
i. Total Direct Charges	\$ 208,535.00	\$ 208,536.00	\$ 262,451.00	\$ 398,937.00	\$ 5,278,146.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
k. Totals	\$ 208,535.00	\$ 208,536.00	\$ 262,451.00	\$ 398,937.00	\$ 5,278,146.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

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SECTION A - BUDGET SUMMARY						
Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1.						
2.						
3.						
4.						
5. TOTAL		\$ 1,107,439.00	\$ 0.00	\$ 4,170,707.00	\$ 0.00	\$ 5,278,146.00

SECTION B - BUDGET CATEGORIES					
6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) PROGRAM OPERATIONS	(2) HEALTH AND SAFETY	(3) LIABILITY INSURANCE	(4) FINANCIAL AUDITS	
a. Personnel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 226,157.00
b. Fringe Benefits	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 129,742.00
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 7,500.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 4,733.00
f. Contract	\$ 3,961,387.00	\$ 225,000.00	\$ 10,500.00	\$ 2,800.00	\$ 4,903,333.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 6,681.00
i. Total Direct Charges	\$ 3,961,387.00	\$ 225,000.00	\$ 10,500.00	\$ 2,800.00	\$ 5,278,146.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
k. Totals	\$ 3,961,387.00	\$ 225,000.00	\$ 10,500.00	\$ 2,800.00	\$ 5,278,146.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

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IV.1 Subgrantees

Subgrantee (City)	Planned Funds/Units
Community Action Partnership of Providence (Providence)	\$1,009,504.00 110
Blackstone Valley Community Action Program (Pawtucket)	\$1,009,504.00 110
Comprehensive Community Action Programs (Cranston)	\$624,930.00 69
East Bay Community Action (Riverside)	\$576,859.00 64
Tri-County Community Action (North Providence)	\$1,009,504.00 110
Westbay Community Action Program (Warwick)	\$576,859.00 63
Total:	\$4,807,160.00 526

IV.2 WAP Production Schedule

Weatherization Plans	Units
Total Units (excluding reweatherized)	526
Rewatherized Units	0
Note: Planned units by quarter or category are no longer required, no information required for persons.	

Average Unit Costs, Units subject to DOE Project Rules		
VEHICLE & EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)		
A	Total Vehicles & Equipment (\$5,000 or more) Budget	\$0.00
B	Total Units Weatherized	526
C	Total Units Reweatherized	00
D	Total Dwelling Units to be Weatherized and Reweatherized (B + C)	526
E	Average Vehicles & Equipment Acquisition Cost per Unit (A divided by D)	\$0.00
AVERAGE COST PER DWELLING UNIT (DOE RULES)		
F	Total Funds for Program Operations	\$3,961,387.00
G	Total Dwelling Units to be Weatherized and Reweatherized (from line D)	526
H	Average Program Operations Costs per Unit (F divided by G)	\$7,531.15
I	Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$0.00
J	Total Average Cost per Dwelling (H plus I)	\$7,531.15

IV.3 Energy Savings

Method used to calculate savings: ☒ WAP algorithm ☐ Other (describe below)			
	Units	Savings Calculator (MBtus)	Energy Savings
This Year Estimate	526	29.3	15412
Prior Year Estimate	194	29.3	5684
Prior Year Actual	0	29.3	0

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Method used to calculate savings description:

Rhode Island will use the calculation based on the energy savings study conducted by the Oak Ridge National Laboratory to support this figure for projected energy savings (multiplier of 29.3 MBTU).

IV.4 DOE-Funded Leveraging Activities

Rhode Island is not planning to use any DOE funds for our continuing leveraging efforts. This does not mean that we will not continue our efforts and seek additional non-federal funds, only that we will not require DOE funds for this effort. The personnel that will be involved in these leveraging efforts are:

Chief of Program Development: This person serves as Weatherization Assistance Program Manager and is responsible for the preparation of the State Plan/Application and its administration and implementation. The CPD will direct the leveraging portion of the grant, attend all leveraging related meetings and search for new leveraging opportunities. DHS will continue to actively pursue sources of leveraged funds to enhance and support RI WAP.

To the maximum extent practical, DHS will work to coordinate WAP with other federal, state, local, and privately-funded programs in order to improve thermal efficiency, conserve energy and foster healthy housing. Coordination efforts have taken place with LIHEAP, Community Development Block Grant (CDBG), USDA, GHHI and other federally funded programs.

Since 2013, CLEAResult has operated as the lead vendor for National Grid's Eligible Services (IES) program. In order to provide the best possible service to our clients, DHS and CLEAResult work collaboratively to deliver weatherization services to eligible Rhode Islanders. Although the DOE WAP program in RI is not directly affected (DOE funds and utility funds are not blended on DOE jobs), the WAP program overall benefits from this working partnership. The CLEAResult team brings another element of energy efficiency knowledge and expertise to the program, and both DHS and CLEAResult share many of the same goals for process improvement and enhanced quality assurance. As an example, CLEAResult and DHS have formed a "Weatherization Technical Committee" (WTC). The WTC meets every six weeks and is comprised of a technical representative from each CAP agency (i.e. an experienced energy auditor); the CLEAResult QA Manager; and DHS state monitors to discuss and as needed develop policy on weatherization matters of a technical nature. Topics covered to date include knob and tube wiring, ASHRAE 62.2, QWP/QCI, Hancock (i.e. HEAT), attic ventilation and more. Best Practices found as a result of field monitoring are also presented and discussed. Subgrantees are invited to suggest agenda topics as well. DHS and CLEAResult have also worked collaboratively on the development and updates of RI WAP/IES Operations Manual which will incorporate all applicable elements of WPN 15-4.

No state funds are used to support RI WAP.

IV.5 Policy Advisory Council Members

☐ Check if an existing state council or commission serves in this category and add name below

Energy Efficiency Resource and Management Council	Type of organization: Unit of State Government Contact Name: Anthony Hubbard Phone: 4012737528 Email: ahubbard@ybpri.org
Housing Resources Commission	Type of organization: Unit of State Government Contact Name: Mr. Raymond Neirinckx Phone: (401)450-1356 Email: raymond.neirinckx@doa.ri.gov
National Grid	Type of organization: Utility Contact Name: Mr. David MacLellan Phone: 4013511800 Email: david.maclellan@clearresult.com
Office of Energy Resources	Type of organization: Unit of State Government Contact Name: Becca Trietch Phone: 4015749106 Email: Becca.Trietch@energy.ri.gov
	Type of organization: Other

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Providence Green and Healthy Homes Initiative	Contact Name: Margarita Robeldo-Guedes Phone: 4014008425 Email: mrobledo@ghhi.org
Rhode Island Community Action Agency Association	Type of organization: Non-profit (not a financial institution) Contact Name: Paul Salera Phone: 4017324666 Email: psalera@westbaycap.org
Rhode Island Housing	Type of organization: Unit of State Government Contact Name: Mr. Charly Pytel Phone: 4014571265 Email: cpytel@rhodeislandhousing.org
RI Department of Health	Type of organization: Unit of State Government Contact Name: Ms. Bonnie CassaniBrandt Phone: 4012227784 Email: Bonnie.CassaniBrandt@health.ri.gov
RI Department of Health and Human Services	Type of organization: Unit of State Government Contact Name: Mr. Fred Sneesby Phone: 4014621669 Email: Frederick.Sneesby@dhs.ri.gov

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

Date Held	Newspapers that publicized the hearings and the dates the notice ran
04/28/2020	The Notice of Public Hearing on the 2020 DOE WAP state plan application was posted on the RI Department of Human Services' website (www.dhs.ri.gov) on 04/16/2020. A copy of the notice has been uploaded to the document library. The stenographer's official transcript of the Public Hearing has been uploaded to the SF-424. The RI WAP Policy Advisory Council met on 4/17/2020 via conference call due to the Covid-19 crisis. The notes from the PAC meeting have been uploaded to the SF-424.

IV.7 Miscellaneous

1. Recipient Business Officer and Recipient Principal Investigators

Recipient Business Officer

Mr. Frederick Sneesby
Administrator, Children and Family Services
Department of Human Services
25 Howard Avenue, Bldg. 57
Cranston, RI 02920
(401) 462-1669
Frederick.Sneesby@dhs.ri.gov

Recipient Principal Investigator

Ms. Julie Capobianco
Chief Program Development
Weatherization Assistance Program
Department of Human Services
25 Howard Avenue, Bldg. 57
Cranston, RI 02920
(401) 462-6420
Julie.Capobianco@dhs.ri.gov

2. The allocation requirements and priorities set forth in Section 440.15 (A) have been implemented. DHS ensures that all Weatherization assistance funds are allocated to non-profit corporations operating under Title II of the Economic Opportunity Act of 1964, 42 USC - 2809. The allocation process is based upon negotiation of individual contracts with non-profit corporations. The determining factors are: past performance by Subgrantee, incidence of poverty in the service area covered; number of LIHEAP households assisted in the service area; and the ability of the agency to weatherize homes effectively.

3. Per WPN 10-12, RI WAP will comply with Section 106 of 16 USC 470 of the National Historic Preservation Act (NHPA). DHS entered into a

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Memorandum of Understanding with the Rhode Island Historical Preservation and Heritage Commission (February 2010) relating to the reporting of historic properties and weatherization. In 2015, the MOU was updated and extended. In 2020, this MOU was replaced with a Programmatic Agreement (PA) which has been signed by the Office of Energy Resources, the Department of Human Services, the RI Historic Preservation and Heritage Commission, and the U.S. Department of Energy. All CAP agencies submit addresses for historic review and clearance per the guidelines established by the RI Historical Preservation and Heritage Commission (RIHPHC). Historic Preservation reports are submitted to DOE as required. A copy of the PA has been uploaded to the SF-424.

4. National Grid and LIHEAP funding continue to be the largest funding sources for WAP. RI WAP received a 15% allocation from LIHEAP in 2020, totaling \$3,631,760. LIHEAP funds provide leveraged dollars for National Grid's Income Eligible Services (IES) program.

5. The Rhode Island PAC met on 04/17/2020 to collectively review and discuss the 2020 RI DOE WAP state plan application. Members were provided a copy of the plan in advance of the meeting, and were also e-mailed the notice of public hearing. A copy of the PAC meeting notes has been uploaded to the SF-424.

6. All six Subgrantees were provided a copy of the draft state plan application as part of an "Interested Parties" email distribution from DHS on 4/20/2020. The Interested Parties notice also included information about the Public Hearing on 4/28/2020.

6. RI has established an average cost per unit for DOE jobs at \$7,509. LIHEAP funds will be used for leveraging measures not covered with DOE funds, or any measures which may not meet the DOE SIR requirement.

7. The Weatherization Policy Advisory Council is a stand alone PAC, and meets for DOE Weatherization purposes only.

8. This plan has been prepared for PY 2020, but may be impacted by the Covid-19 pandemic.

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This worksheet should be completed as specified in Section III of the Weatherization Assistance Program Application Package.

V.1 Eligibility

V.1.1 Approach to Determining Client Eligibility

Provide a description of the definition of income used to determine eligibility

All dwelling units to be weatherized shall be determined eligible in such a manner to ensure that each weatherized unit meets the qualifications of CFR 440.22 - Eligible Dwelling Units.

Rhode Island elects to use LIHEAP income guidelines - 60% of state median income- to determine eligibility for WAP. For families with eight (8) or more in the household, DHS has revised WAP eligibility to be 200% of federal poverty level to meet the requirements of 10 CFR 440.22 and the most recent version of DOE WAP Poverty Income Guidelines and Definition of Income available. All Subgrantees will be provided with this information and have been instructed to refer to 2020 DOE LIHEAP and WAP Income Guidelines, attached to the SF-424.

440.22 Eligible dwelling units. (a) A dwelling unit shall be eligible for weatherization assistance under this part if it is occupied by a family unit: (1) Whose income is at or below 200 percent of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget, (2) Which contains a member who has received cash assistance payments under Title IV or XVI of the Social Security Act or applicable State or local law at any time during the 12-month period preceding the determination of eligibility for weatherization assistance; or (3) If the State elects, is eligible for assistance under the Low-Income Home Energy Assistance Act of 1981, provided that such basis is at least 200 percent of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget.

According to the RI LIHEAP manual, all Primary Applicants and Household Members shall report income. Income documentation shall represent gross income earned in the most recent three months, except when the document clearly states that the income amount is constant, and also clearly lists the period of the benefit. Income types include: wages, unemployment benefits, fixed income, self-employment, odd jobs, worker's compensation, alimony and child support, interest income, dividends, rental income, support from family and friends, cash prizes and lottery winnings, estate or trust income, or No-Income - Dependent.

Describe what household eligibility basis will be used in the Program

RI WAP elects to use a single application process in conjunction with LIHEAP which is also administered by DHS. Both LIHEAP and WAP use the Hancock Energy Software program. The single application process simplifies the application process for clients and enables subgrantees to share staff and resources in the certification process. The process also provides consistency for eligibility for all income-eligible weatherization programs including National Grid's Income Eligible Services (IES) program.

No dwelling unit may be weatherized without documentation that the unit is an eligible dwelling unit. Applications for assistance under this Program will be made through the Weatherization Service Agency (the Subgrantee) who has the responsibility of ensuring that the applicant represents a family unit whose income is at or below minimum income guidelines. Only families with income no higher than the figures listed below may be assisted. Rhode Island elects to use LIHEAP income guidelines - 60% state median income - for the RI Weatherization Assistance Program for households with eight or less. In order to comply with 10 CFR 440.22, households with eight (8) or more will follow a different eligibility threshold - 200% of Poverty Level - using the most recent version of DOE WAP Poverty Income Guidelines and Definition of Income available.

PY 2020 Low-Income Guidelines for DOE WAP

FAMILY SIZE (12 Month Income may not exceed):

1 - \$31,166

2 - \$40,756

3 - \$50,345

4 - \$59,935

5 - \$69,525

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6 - \$79,114

7 - \$80,912

8 - \$82,710 **DOE WAP Eligibility: \$88,240 200% Poverty**

9 - \$84,508 **DOE WAP Eligibility: \$97,200 200% Poverty**

10 - \$86,306 **DOE WAP Eligibility: \$106,160 200% Poverty**

11 - \$88,104 **DOE WAP Eligibility: \$115,120 200% Poverty**

12 - \$89,903 **DOE WAP Eligibility: \$124,080 200% Poverty**

LIHEAP intake workers will be provided guidance on following the provisions of WPN 20-3. Families with 8 or more that do not qualify for LIHEAP may still be eligible for weatherization services, and it is incumbent on the Subgrantees to refer these families to WAP for further information. If a family does qualify for WAP, but not for LIHEAP, a separate intake will be done in HES by the weatherization office. If eligible for services, these jobs will be 100% DOE funded, with no LIHEAP funds leveraged.

In addition, DHS will work with HES to determine if families with 8 or more in the household that are denied for LIHEAP, but below 200% FPL, could be flagged for follow-up by the Subgrantee.

The contract between the Department of Human Services (DHS) and the Weatherization Community Action Agency (Subgrantee) mandates that each agency certifies the income eligibility of those recipients of weatherization assistance. DHS will ensure compliance through examination of records and reports for each non-profit corporation. DHS has developed a statewide application that ensures that all information requested from the client allows to the maximum extent possible, the most accurate and complete data to determine income eligibility. LIHEAP clients are certified in the Hancock Energy Systems (HES) database. All CAP Agencies use HES, and are able to access the Hancock database for referrals and to maintain waiting lists.

The term "child" shall mean person under eighteen (18) years of age.

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

DHS uses the LIHEAP application certification process to determine eligibility for LIHEAP and WAP. Non-U.S. citizens with "Qualified Alien" status are entitled to LIHEAP/WAP benefits as long as they meet identity, income, and residency requirements.

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

No dwelling unit may be weatherized without documentation that unit is eligible under DOE guidelines. Applications for assistance under this program will be made through the Weatherization Service Agency (Subgrantee). The Subgrantee is responsible for ensuring that the applicant represents a family unit whose income is at or below minimum income guidelines. The contract between DHS and Subgrantees mandates that each agency certifies the income eligibility of prospective recipients of weatherization assistance. DHS will ensure compliance through examination of records and reports for each CAP Agency. DHS has also developed a statewide application that ensures, to the maximum extent possible, that all information requested from the client is accurate and contains complete data necessary to determine income eligibility. LIHEAP and WAP have been fully integrated into the Hancock database. All LIHEAP eligible clients are routinely updated to HES WAP.

Clients who are home owners are required to show proof of homeownership, and clients who are renters must have signed permission from the building owner/landlord before work can begin.

DHS helps to ensure that the benefits of weatherization are protected for tenants of rental units by requiring 1) An executed copy of the "Authorization to Perform Work" and 2) the "Rhode Island Weatherization Assistance Program Rental Units Building Agreement". These two forms help ensure that written permission of the building owner or his agent is given before commencing work; the benefits of the services accrue primarily to the low-income tenants residing in such units; that for a reasonable period of time after completion, the

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household will not be subjected to rent increases (unless those increases are demonstrably related to other matters other than the weatherization work performed).

When altering the exterior to any home built before 1966, Historic Preservation protocols must be followed. The Programmatic Agreement between the state (DHS and OER), DOE and the RI Historical Preservation and Heritage Commission (RIHPHC) has been executed, and is uploaded to the SF-424. In addition, the Hancock Energy System has developed and added a "Historic Preservation Review" section on the "Audit Information" screen of the audit tool where users must indicate compliance with Historic Preservation requirements, as applicable.

RI WAP Authorization to Perform Work - uploaded to the SF-424

RI WAP Rental Units Building Agreement - uploaded to the SF-424

Describe Reweathering compliance

RI WAP allows re-weatherization of homes previously weatherized prior to September 30, 1994. Since there have been many advances in weatherization technologies since 1994, some homes may have not received all weatherization services suitable for that home, including health and safety issues/concerns. Subgrantees are required to maintain historical records (e.g. Access Database, Captain excel spreadsheet, card catalog files) of previously weatherized units. The current Hancock client database, as well as older Access databases and Captain are checked for any previous WAP activity before an audit is scheduled. DHS will also review the Subgrantee's approach to determining building eligibility during the annual subgrantee monitoring.

Describe what structures are eligible for weatherization

Structures eligible for weatherization include single family, manufactured housing, and multi-family dwellings. All structures must be stationary and have a specific mailing/street address. Campers and non-stationary trailers are not eligible for weatherization services. Shelters and group homes may also be weatherized. Eligibility is specified in the "Definitions" section of 10 CFR440.

Rhode Island has approximately 463,000 housing units of which 409,308 are occupied (88.4%). The bulk of the housing is single-family detached homes, and over half of all housing units in the state have two or three bedrooms. About 60% of occupied units in the state are owner-occupied, and the rest are renter-occupied.

It is estimated that one-third of the housing units in the state are at least 70 years old. Another half of the housing units in the state were built between 1940 and 1980. 42% of the occupied housing units are at or below "low income" levels (80% Average Median Income). Of the 173,460 occupied low income housing units, 104,076 (60% (25.2% of overall occupied housing units) are renters and 69,384 (40% (16.8% of overall occupied housing units) are homeowners.

Describe how Rental Units/Multifamily Buildings will be addressed

1. In order to ensure that the benefits of weatherization are protected in accordance with 440.22(b)(3), all weatherization rental units are required to obtain the owner's consent on the "Authorization to Perform Work" Form, and by also signing the "RI WAP Rental Units Building Agreement". Among other things, the Rental Units Building Agreement helps ensure that the benefits of Weatherization services accrue primarily to the low income tenants residing in the units and that for a reasonable period of time after completion that the household will not be subject to a rent increase unless the increases can be attributable to other causes.

2. Because of limited DOE WAP funding, DHS does not anticipate completing any large multi-family weatherization buildings with DOE funds, and instead refers MF weatherization inquiries to the National Grid low-income multi-family dwelling program. RI recognizes that DOE funds are available for MF work if the occasion arises.

In RI, National Grid provides a significant amount of DSM funding to support low-income multi-family energy efficiency projects. This program is administered by RISE Engineering, Lead Vendor for National Grid. Where appropriate, DHS refers inquiries for multi-family weatherization services to RISE.

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https://www1.nationalgridus.com/files%5CAAddedPDF%5CPOA%5CRI_MF_Flyer.pdf

In RI, multi-family is defined by:

- Buildings with 5+ units and/or properties consisting of four or more 1-4 unit buildings that meet both of the following requirements:
- Are connected or adjacent to each other, or to a 5+ unit building, and;
- Are owned by the same individual or firm.

Stand-alone 1-4 unit buildings that do not meet the above requirements are considered “single-family” and will be served traditionally through WAP or National Grid’s Income Eligible Services Program as appropriate.

As provided for in 10 CFR 440.22 an eligible dwelling unit may be weatherized where not less than 66% (50% for two and four unit buildings) are eligible.

Procedures for Weatherizing Buildings with Two or More Units.

DOE funding for MF projects may be used only where allowed where minimum program requirements are met.

A. Buildings with Less than 50% of the Dwelling Units Eligible

When less than 50% of the dwelling units in a building are eligible for weatherization, the following procedures must be followed:

- All applicable major air sealing/general heat waste, heating system and wall insulation must be completed on the eligible unit;
- All common areas (hallways, attics, basements) that are immediately adjacent to the eligible unit must be weatherized;
- The building’s ineligible units cannot be weatherized.
- Allowable expenditures are limited to those of the eligible unit or units and production credit will be granted for the eligible unit(s) only.

B. Buildings Where 50% of the Units in a Two (2) or Four (4) Unit Building, or 66% of the Units in Any Building, Are Eligible

When 50% of the units in a two (2) or four (4) unit building, or 66% of the units in any building are eligible for weatherization, the Subgrantee may weatherize the entire dwelling with DOE funds.

- All applicable major air sealing/general heat waste, heating system and wall insulation must be completed
- All common areas (hallways, attics, basements) regardless of their location, must be weatherized

Describe the deferral Process

Deferral of weatherization services may be necessary when Health and Safety issues cannot be adequately addressed. Deferral does not mean that the home cannot or will not be weatherized, but that the work must be postponed until the problems leading to the deferral are corrected. If the reasons for deferral are resolved, the home may be considered for weatherization services provided that the application still meets eligibility guidelines.

Auditors must use professional judgment when determining if there are conditions present which may endanger the health/safety of the workers or occupants. Subgrantee staff are expected to refer or connect clients to alternate sources of assistance (i.e. CDBG, Green and Healthy Homes or local government home repair programs) where appropriate. Deferral may also be necessary where occupants are uncooperative, abusive or threatening.

Deferral conditions may include the following: 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 the conditions cannot be resolved within the guidelines and at reasonable costs (repairs are beyond incidental); The house has sewerage or other sanitary problems including pet/animal excrement that can’t be corrected through weatherization and would further endanger the client and weatherization installers if weatherization work were performed; The house has been condemned or electrical, plumbing or other equipment has been red tagged by local or state building officials or utility companies and weatherization funds are not sufficient or corrective measures are not allowable costs; Moisture or potential moisture problems are present and cannot be resolved under existing health and safety guidelines and with minor repairs; Dangerous conditions in the home due to high carbon monoxide levels in combustion appliances or their venting which cannot be resolved under existing health and safety guidance.

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Subgrantees should take immediate action to ensure the combustion appliance is not used, including instructing the client to contact a combustion appliance repair/replacement specialist; The client is uncooperative, abusive, or threatening to the auditor, subcontractors, inspectors, or others who must work on or visit the home; The extent and condition of lead based paint or any other identified hazardous condition in the house which could potentially create further health and safety hazards; Pest infestation that cannot be reasonably removed or poses health concerns for workers; In the judgment of the energy auditor, any condition exists which may endanger the health and/or safety of the subcontractors; Homes with conditions that have the potential to create a health concern requiring more than incidental repair.

A copy of the RI WAP Deferral Form is uploaded to the SF-424. The HES database allows for tracking of deferrals.

V.1.3 Definition of Children

Definition of children (below age): **18**

V.1.4 Approach to Tribal Organizations

☐ Recommend tribal organization(s) be treated as local applicant?

If YES, Recommendation. If NO, Statement that assistance to low-income tribe members and other low-income persons is equal.

The low-income members of an Indian Tribe shall receive benefits equivalent to the assistance provided to other low-income persons within the State. Approximately one third of the major concentration of the State's Native American population (approximately 2,898 persons) is located in the Providence County area, with the other two thirds spread statewide with a higher concentration in the South County area. Native Americans will be serviced in the Weatherization Assistance Program in the same manner that all other low-income Rhode Islanders are: through the local Community Action Agency that serves the city/town in which they live.

V.2 Selection of Areas to Be Served

All 39 cities and towns in the state will be served. The 2018 Service Areas of the State have been identified as follows:

East Bay Community Action Agency: East Providence, Barrington, Warren, Bristol, Jamestown, Little Compton, Newport, Portsmouth, Tiverton, Middletown

Comprehensive Community Action Agency: Cranston, Foster, Scituate

Tri-County Community Action Agency: Glocester, North Providence, Burrillville, Smithfield, Johnston, Hopkinton, Narragansett, North Kingstown, Westerly, Exeter, South Kingstown, West Greenwich, Charlestown, New Shoreham, Richmond

Westbay Community Action Agency: Warwick, Coventry, West Warwick and East Greenwich

Providence Community Action Agency: Providence

Blackstone Valley Community Action Agency: Woonsocket, North Smithfield, Pawtucket, Lincoln, Cumberland, Central Falls

DHS may suspend or terminate a contract with a weatherization subgrantee any time for any cause. "For cause" shall mean a finding of non-compliance with the procedures established in this section. In case of subgrantee failure to comply substantially with the provisions of the Energy Conservation in Existing Building Act of 1976, or 10 CFR, Part 440, DHS may take immediate steps to suspend or terminate the contract with that agency. Cause for suspension or termination of contracts shall include:

- Failure to maintain adequate fiscal controls and accounting procedures
- Filing late and inaccurate financial and programmatic reports
- Misuse of program funds
- Inability of the subgrantee to account for materials and equipment purchased
- Failure to adhere to the schedule for goals and objectives established
- Provision of weatherization services that are not done in a quality manner
- Failure to use weatherization materials that meet or exceed Federal specifications

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- Failure of a subgrantee to comply with the terms of a contract
- Failure to comply with audit requirements
- Failure to comply with required purchasing procedures
- Discrimination of employees
- If a project is supported over two or more funding periods, suspension or termination may occur due to the failure to submit reports still due from the prior period

DHS may at its discretion either following notice and a hearing or by agreement with a weatherization subgrantee place an "agency at risk" status as an alternative to suspending or terminating a contract for cause; a finding of non-compliance by a subgrantee with an "agency at risk" status designation shall be cause for suspension or termination of a contract with a weatherization subgrantee.

Should any of the service providers which are identified in this plan cease to administer the Weatherization Program during the year covered by this plan, a temporary service provider will be selected. The temporary service provider may be selected from the existing list of subgrantees.

V.3 Priorities for Service Delivery

Department of Energy (DOE) 10 CFR Part 440, Section 440.16 requires that grantees develop procedures to ensure that priority is given to identifying and providing assistance to: elderly persons; persons with disabilities; families with children; high residential energy users; and Households with a high energy burden.

Where all of the above is equal, applicants who have been waiting for weatherization services longer, may be prioritized for service over an applicant who has not been on the waiting list as long.

Priority Categories

1. Senior Citizen Household Member: _____
60-65.....1 point
66-71.....2 points
72-77..... 3 points
78-83..... 4 points
84 + 5 points

2. Disabled: _____
1 point for each disabled household member

3. Families with Children: _____
Under age 1.....5 points
1-2.....4 points
3-5.....3 points
6-9..... 2 points
10-17..... 1 point

4. High Energy User: _____
1 point for High Energy Users

5. High Energy Burden: _____
1 point for High Energy Burden

Parameters are set up in Hancock to calculate if a customer is a High Energy User, and/or have a High Energy Burden. A recent study by ACEEE "Lifting the High Energy Burden in America's largest cities revealed that Providence, RI has the highest percentage of low-income energy burden in the Northeast (Providence, Pittsburgh, Philadelphia, Hartford, New York City, Baltimore, Boston, and Washington DC) based on the average of the median energy burdens across all groups.

RI WAP considers a household that spends more than 10% of their income on energy costs as having a High Energy Burden and priority points are given.

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V.4 Climatic Conditions

For the purposes of WAP, DHS regards the entire state as having a uniform climate. In Hancock, Subgrantees can choose from the following weather stations, and should choose the Block Island State Arpt; Pawtucket; Providence; Providence TF Green Airport for modeling audits and should select the location of the nearest weather station.

Because Rhode Island has a short cooling season, RI WAP does not address cooling measures in the DOE Weatherization Assistance Program.

V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials

RI contracted with Saturn Resource Management to develop the SWS-aligned *Rhode Island Weatherization Field Guide*, and its recent update in 2019. RI's Weatherization Technical Committee (WTC) was an integral part of the review and editing of this document. On 4/9/19, DOE notified RI that the Field Guide had been approved with 2 variance requests. The updated Field Guide has been distributed to subgrantees, CLEAResult staff, DHS weatherization staff, and weatherization contractors.

The "RI WAP IES Operations Manual" is uploaded to the SF-424. Printed copies and dedicated flash drives have been distributed to all Subgrantees. In 2020, the OM was updated with the assistance of an ad hoc working group comprised of energy auditors, state monitors, weatherization coordinators, DHS program manager and CLEAResult staff. The OM will be bound and printed with removable pages for updating ease and convenience. Training on the updated manual is planned for the summer of 2020 at an "All Agency" meeting.

DHS will ensure that all expectations and requirements are communicated and codified in appropriate agreements and contracts. This will include all DHS/CAP Agency contract agreements. All CAP Agency/Weatherization contractor contract agreement and will include the following language:

SPECIFIC TERMS

During the Term, the Subgrantee shall weatherize eligible dwelling units in compliance with the terms of the RI WAP Operations Manual, the RI Weatherization Field Guide, this Agreement, as well as any Federal or State statutes or regulations pertaining thereto, including but not limited to 42 U.S.C. section 6861 et seq.; and 10 C.F.R. Part 440 and 600; the requirements specified in Office of Management and Budget ("OMB") 2 CFR 200 and all other applicable Federal, State, and local laws, rules, regulations, administrative procedures, guides, manuals, program rules, regulations, and definitions, and any amendments thereto, in performing its obligations under this Agreement. Subgrantee specifically acknowledges that it must comply with all applicable Federal, State, and local laws, rules, and regulations pertaining to wages, hours, conditions of employment, and all health and safety standards.

Subgrantee shall perform weatherization services during the Term in accordance with the U.S. Department of Energy Weatherization Assistance Program State Plan for the State of Rhode Island, the Rhode Island Weatherization Field Guide, the Rhode Island Operations Manual, other State Weatherization directives as applicable, and any amendments thereto (collectively "State Weatherization Plan and Directives"). Subgrantee shall abide by and perform all work in accordance with the RI Weatherization Field Guide which has been aligned with the Department of Energy's Standard Work Specifications (SWS). The Subgrantee's signature on this agreement signifies its responsibility to follow all work standards as outlined in the documents referenced in this paragraph.

Subgrantee shall comply with all of the training and certification requirements that are specified in the RI Weatherization Operations Manual, and WPN 15-4 as required by the DOE.

No subcontractor of Subgrantee shall be paid for any work performed until such time as Subgrantee has performed an inspection of all of the weatherization work completed and has determined that any such work has been performed in a satisfactory manner ("Final Inspection").

Subgrantee shall ensure that all Weatherization staff and subcontractors who perform or provide Weatherization services to client homes receive and adhere to all standards as outlined in Rhode Island's Weatherization Field Guide, The Rhode Island Weatherization Assistance Program Operations Manual, the Department of Energy Weatherization Assistance Program State Plan for Rhode Island and other State Weatherization directives as applicable. The Subgrantee's signature on this agreement signifies its responsibility to follow all work standards as outlined in the documents referenced in this paragraph as well as its responsibility to ensure that its Weatherization staff and subcontractors receive and review these documents and use them to guide the Weatherization work performed in client homes by them.

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Subgrantee shall include language in subcontractor contracts detailing that all Weatherization services will be performed in accordance with the standards outlined within the documents as described in this Agreement.

The type of weatherization work to be performed by the subgrantees will include energy measures identified by the Hancock Energy Audit Tool (HEAT). All materials will be installed in accordance with the DOE-approved energy audit and Appendix A of 10 CFR 440. RI conducts HEAT audits for every single family-site built unit.

DHS applied for and received single family audit approval from DOE on 8/31/15, for a period of 5 years (expiring on 8/15/20). On 9/6/17, DHS received notice that DOE had revoked full audit approval for RI, and replaced it with conditional approval. RI WAP continues to work toward full audit approval in conjunction with DOE technical staff and consultants. In 2020, DHS will seek single family and manufactured housing audit approval. DHS will make every effort to obtain single family audit approval prior to 8/15/20 while simultaneously working toward MF audit approval.

Electric baseload measures are addressed through National Grid's Income Eligible Services (IES) Appliance Management Program (AMP). Every weatherized home receives an AMP audit and evaluation, and if conditions warrant, electric baseload measures are addressed (eg. refrigerator replacement, CFL's (unlimited), LED's (limited), Smart Strips, washing machines, etc.).

Field guide types approval dates

Single-Family: 4/8/2019

Manufactured Housing: 4/8/2019

Multi-Family:

V.5.2 Energy Audit Procedures

Audit Procedures and Dates Most Recently Approved by DOE

Audit Procedure: Single-Family

Audit Name: HEAT

Approval Date: 8/31/2015

Audit Procedure: Manufactured Housing

Audit Name: Other (specify)

DHS will work toward MH audit approval in 2020.

Approval Date:

Audit Procedure: Multi-Family

Audit Name: Other (specify)

HEAT for small 2-4 unit multi-family dwellings. See Comments.

Approval Date:

Comments

HEAT

Rhode Island's single family audit procedures were approved on 8/31/15.

DOE moved RI to "Conditional Audit Approval" on 9/6/17.

Mobile Home Audit

DHS recognizes that it is not in compliance with the requirement for an approved mobile home audit. DOE funds are never used to weatherize mobile homes - it is not allowable in Hancock. RI uses LIHEAP and/or utility funds to weatherize mobile homes so this population can continue to be served. Mobile homes account for 0.9% of the total housing units in the state. A full HEAT audit is modeled for every mobile home weatherization job. In 2020, RI will seek MH audit approval to bring the program into compliance with DOE regulations.

Multi-Family Weatherization

With reduced DOE WAP funding, DHS does not plan to complete any large multi-family projects with DOE funds. Rhode Island has a utility-funded low-

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income multi-family weatherization program that is administered by RISE Engineering and all requests for weatherization services in large multi-family buildings are referred to that program.

<https://www1.nationalgridus.com/files/5CAddedPDF%5CPOA%5CRI MF Flyer.pdf>

Small multi-family weatherization (2-4 units) are modeled in HEAT audit to determine appropriate cost-effective measures.

V.5.3 Final Inspection

As specified in 10 CFR 440.16, one hundred percent (100%) of weatherized dwelling units shall be inspected and certified as complete by the Subgrantee's authorized agent, prior to reporting said dwelling units as completed home. This provision is included in DHS/Subgrantee contract agreements. The QCI form certifies that each home has been completed and is signed and dated by the client, the QCI inspector, and the weatherization coordinator. Final inspections must include all health and safety testing including combustion efficiency, CO testing of all combustion appliances and worst case draft testing of all vented combustion appliances. DHS recommends that subgrantees perform "real time" final inspections whenever possible, on the last day of scheduled work, and while the weatherization contractor is still on-site. This practice improves responsiveness and efficiency of program operations by allowing contractors to immediately address any unsatisfactory work. Subgrantees are strongly encouraged to conduct "work in progress" inspections on at least 20% of jobs to review contractor work, discuss issues and concerns, check for lead safe work practices, and inspect attic air sealing work.

Disciplinary actions for inadequate inspection practices are reviewed on a case-by-case basis, and are identified through state monitoring visits. When disciplinary action is warranted, a subgrantee corrective action plan may be requested by the state, and should reflect the significance of the finding or concern. Examples of when disciplinary action may be warranted include:

- A. Repeated occurrences of failed CAZ testing resulting in re-work;
- B. Repeated monitoring finding related to the contractor performing the work;
- C. Repeated incidents of unsatisfactory, sub-standard work performance;
- D. Repeated incidences of violating DHS, DOE or LIHEAP program requirements;
- E. Fraudulent activity or fraudulent charges that are being reimbursed by the Weatherization Assistance Program;
- F. Negligent work performance that leaves clients or other workers in imminent danger (i.e. Health and Safety such as carbon monoxide allowed to enter the home or a gas leak not addressed).

Depending on the severity of the issue, consequences may include:

1. **Remedial Training. Category A.** A worker (auditor or contractor) that falls under **Category A** will be recommended for remedial training and may be denied from participating in the program until the remedial training is completed. In addition to remedial training, an increase of on-the-job training or supervision may be warranted as well.
2. **Denial of Participation.** A contractor or worker performing work that falls under categories **B, C and D** may be denied participation for up to 2 years.
3. **Permanent Debarment** - A contractor or persons performing work that falls under category **E and F** may be permanently debarred from providing weatherization services through DHS' Weatherization Assistance Program.

In all disciplinary cases, an increase in the number of units monitored will be implemented.

At this time, there are 12 QCI inspectors in RI. All subgrantees have at least one QCI inspector on staff.

Status of CAP Agency QCI Inspectors

BVCAP - 2 QCI
CCAP - 1 QCI
Eastbay - 1 EA/QCI
CAPPRI - 2 QCI

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Tri-County - 2 EA/QCI
Westbay - 2 EA/QCI, 1 QCI

State Monitors

John Costello - currently not certified
Ramon Lantigua - EA/QCI

State Monitor #3 - vacant

All QCI individuals must submit copies of their certifications (lead renovator, BA, QCI, EA, other HEP certifications) to DHS.

The RI WAP Field Inspection Form has been uploaded to the SF-424.

QCI Inspection Procedures

The following procedures are provided as a guide for performing the quality control inspection services:

1. QCI Inspector schedules an appointment with the customer to visit the dwelling and perform the inspection;
2. QCI Inspector arrives at dwelling equipped to conduct all necessary tests and services at the appointed time; Inspector performs blower door test verify results of air infiltration reduction achieved by the local agency; combustion efficiency test, and walk-through inspection as appropriate and required;
3. QCI Inspector records comments and quality assessment on the quality control form. Inspector also records variances in resource accountability between work order and/or invoice and inspection findings;
4. Signature of customer is obtained (signature must be a resident adult); and
5. Complete the Quality Control Inspection Form in the prescribed manner and forward a copy to the local agency.

The purpose of the Quality Control inspection is to:

- To provide services in a manner that meets the highest level of professionalism and to comply with standards established by DHS, the federal government, and the industry; and
- To provide services in a timely fashion and with the highest level of resource accountability possible in accordance with the scope of work provided.

The subgrantee is responsible for ensuring that all Quality Control Inspectors are adequately trained and credentialed.

Quality Control Inspectors should be independent of the work they are inspecting. Ideally, the QCI inspector should not be the same individual who audited the property or performed any of the work for the property they are inspecting. In instances where this is not possible due to staffing, DHS will increase monitoring to 10% of completed units.

Where the auditor and the final inspector are the same, at least 10 percent of quality assurance reviews will be conducted where the auditor and the QCI inspector are the same.

It is the responsibility of the Quality Control Inspector to ascertain the completeness and quality of work according to the work order, of each dwelling unit before certifying in the Hancock system that the unit is complete.

BPI Technical Standards, The Rhode Island Weatherization Field Guide installation processes and SWS quality of standards should all be considered in this process. At a minimum, Quality Control Inspections must contain these elements:

- Perform a blower door test to verify results of air infiltration reduction achieved;
- Perform a combustion efficiency test of the central heating system;
- Perform a walk-through inspection of the property to verify the presence of installed materials and that the installation of materials as recorded on the Work Order and Invoice documents meet SWS quality;
- Document customer comments and obtain customer signature on the QCI Form verifying the work performed; and
- Certify completeness and quality of all items listed in the work scope in the Hancock system.
- Perform all diagnostic testing, including CAZ testing, as part of the inspection process.

DHS' QCI inspectors are required to review not less than 10% of completed units. If the QCI Inspector finds a pattern of missing or poor quality work in the random sampling, a higher percentage or all dwelling units of that agency may be inspected.

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The agency must access Hancock and create a work order of all items that failed. When the work has been corrected, the subgrantee will notify DHS and arrange for the QCI re-inspection.

Units with failed measures must be resolved within five working days. Failure to adhere to this policy could result in the withholding of funds, stopping payment on current invoices and, in extreme cases, suspension or removal from one or more of RI WAP/IES weatherization programs.

DHS requires that all outstanding "failed" units be resolved and treated as a priority. Repeated failures may result in DHS requesting a corrective work plan to be developed by the agency.

Acceptance of Work

To clarify standard inspection protocols, please note the following:

- A unit will fail inspection if materials reported as installed cannot be found;
- A unit will receive a poor QA inspection if measures were not installed to standards;
- No unit will be failed for missed opportunities regarding air infiltration reduction, unless the inspector uses a blower door and can verify that substantial air leakage still exists;
- A unit may fail if major weatherization services or leveraging opportunities were missed (e.g., no attic insulation installed and could have been, no furnace work performed etc.) and the file does not indicate why the service was omitted.
- A unit will fail if additional, uninstalled health and safety measures are still required to protect the family.

Customer "No-Show" Policy

It is anticipated that a small percentage of units will not receive Quality Control inspections due to a variety of extenuating circumstances including:

- Customer moves/dies & property is vacant or occupied by a second party;
- Customer is unavailable after several attempts to re-enter and inspect.

The following are the procedures for reporting "no show" properties:

1. Local agency completes the weatherization services.
2. QCI Inspector will be responsible for contacting landlords/property managers to seek assistance in completing the inspection process, as required.
3. QCI Inspector must make several attempts to enter the property, including:
 - a. Contacting the customer by telephone to schedule appointment;
 - b. Forwarding of a letter setting a time and date for the inspection;
 - c. Conducting an unscheduled site visit to the dwelling; and
 - d. In the case of rental properties, performing the previous steps with the landlord as well as the customer.

4. Where QCI inspections are not possible, an alternative (non-DOE) funding source must be used. The unit cannot be reported to DOE as a completed unit without a QCI inspection.

The subgrantee is required to notify DHD that the unit cannot be accessed and provide documentation of each attempt to contact.

Because RI WAP does not use DOE resources to weatherize multi-family buildings at this time, there is no plan to receive training on the NREL Multifamily Quality Control Inspector JTA.

Contract language (see Special Terms) is included in Subgrantee Contractor Agreements which codify the signatory's responsibility to perform work to the specifications outlined in WPN 15-4 and in accordance with other state and federal requirements.

QCI - Overall Job Rating

- Good (no missed opportunities, all work installed according to standards)
- Poor (measures were not installed to standards, client files incomplete)
- Fail (materials reported as installed are not found, major weatherization opportunities were missed without an explanation of why the measure(s) were omitted in the client file, uninstalled health and safety measures that are still required to protect the family)

No unit will be failed for missed opportunities regarding air infiltration reduction, unless the inspector uses a blower door and can verify that substantial air leakage still exists

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Disciplinary actions for non-compliance with post inspection protocols will be classified as:

- Level 1: Subgrantee has routinely responded to corrective actions, 100% effective.
- Level 2: Subgrantee has had marginal or insufficient results responding to corrective improvement on initial responses, but ultimately addressing all concerns and demonstrating improvement. Subgrantee will be subject to increased state monitoring and inspection
- Level 3: Subgrantee has failed to address corrective actions and/or deficiencies repeatedly. This designation may result in temporary suspension and disallowed costs.
- Level 4: Indefinite suspension, defunding of Subgrantee and contract termination.

SPECIFIC TERMS

During the Term, the Subgrantee shall weatherize eligible dwelling units in compliance with the terms of the RI WAP Operations Manual, the RI Weatherization Field Guide, this Agreement, as well as any Federal or State statutes or regulations pertaining thereto, including but not limited to 42 U.S.C. section 6861 et seq.; and 10 C.F.R. Part 440 and 600; the requirements specified in Office of Management and Budget ("OMB") 2 CFR 200 and all other applicable Federal, State, and local laws, rules, regulations, administrative procedures, guides, manuals, program rules, regulations, and definitions, and any amendments thereto, in performing its obligations under this Agreement. Subgrantee specifically acknowledges that it must comply with all applicable Federal, State, and local laws, rules, and regulations pertaining to wages, hours, conditions of employment, and all health and safety standards.

Subgrantees shall perform weatherization services during the Term in accordance with the U.S. Department of Energy Weatherization Assistance Program State Plan for the State of Rhode Island, the Rhode Island Weatherization Field Guide, the Rhode Island Operations Manual, other State Weatherization directives as applicable, and any amendments thereto (collectively "State Weatherization Plan and Directives").

Subgrantees shall abide by and perform all work in accordance with the RI Weatherization Field Guide which has been aligned with the Department of Energy's Standard Work Specifications (SWS).

Subgrantees shall comply with all of the training and certification requirements that are specified in the RI Weatherization Operations Manual, and WPN 15-4.

Subgrantees shall provide in-home energy education regarding reducing energy consumption and health and safety concerns to the persons who receive the weatherization services pursuant to this Agreement.

No subcontractor of Subgrantee shall be paid for any work performed until such time as Subgrantee has performed an inspection of all of the weatherization work completed and has determined that any such work has been performed in a satisfactory manner ("Final Inspection").

Subgrantee shall select subcontractors in a manner that assures competitive procurement of services in compliance with all applicable laws, including but not limited to 10 CFR 600.236, and 2 CFR 200.318 through 2 CFR 200.326. Neither Subgrantee nor any subcontractor of Subgrantee shall be reimbursed until such time as Subgrantee has performed an inspection of the work performed and has determined in writing that any such work has been completed in a satisfactory manner.

Subgrantee shall ensure that all Weatherization staff and subcontractors who perform or provide Weatherization services to client homes receive and adhere to all standards as outlined in Rhode Island's Weatherization Field Guide, The RI WAP Operations Manual, the Department of Energy Weatherization Assistance Program State Plan for Rhode Island and other State Weatherization directives as applicable. The Subgrantee's signature on this agreement signifies its responsibility to follow all work standards as outlined in the documents referenced in this paragraph as well as its responsibility to ensure that its Weatherization staff and sub-contractors receive and review these documents and use them to guide the Weatherization work performed in client homes by them.

Subgrantee shall include language in subcontractor contracts detailing that all Weatherization services will be performed in accordance with the standards outlined within the documents as described in this Agreement.

In making any procurement or entering into any contract that requires the expenditure of funds provided pursuant to this Agreement, Subgrantee shall adhere to the applicable provisions of 10 CFR. 440, 10 CFR 600 and 2 CFR 200.318 through 2 CFR 200.326, and Minority Business Enterprise (MBE) policies including R.I.G.L. 37-14.1, regarding procurement.

Subgrantee acknowledges and agrees that funds provided through this Agreement shall not be used for the purchase or improvement of land, or for the purchase, construction, or permanent improvement (other than low-cost residential weatherization or other energy- related home repairs) of any building or other facility.

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Subgrantee acknowledges and agrees that it must maintain an overall average cost per dwelling amount not to exceed \$7,669 for PY 2020.

Subgrantee acknowledges and agrees that the funds provided through this Agreement shall be used to supplement, and not supplant, State or local funds and, to the extent practicable, to increase the amounts of such funds that would be made available in the absence of Federal funds for carrying out activities specified in this Agreement.

V.6 Weatherization Analysis of Effectiveness

Although DHS has not conducted a formal program evaluation of cost effectiveness, adhering to the SIR requirement helps ensure that the program maintain its mainstay of cost-effectiveness.

EA and QCI Inspector training and certification will also help ensure that high quality work standards and cost effective energy conservation practices are followed. Recent DOE requirements for Quality Work Plans and Quality Management Plans will help improve the overall efficiency of WAP. DHS will continue its efforts for program and process improvement by providing technical and program training for state and subgrantee staff as needed.

Subgrantees are subject to ongoing fiscal and program monitoring. Subgrantees are required to inspect 100% of the work completed and maintain control over expenditures in accordance with federal financial management guidelines and generally accepted accounting procedures.

Annual program and fiscal assessments provide a second level of weatherization program analysis. The monitoring effort focuses on accountability and technical proficiency. Subgrantee records, client files, and invoices are checked for consistency and compliance. At least 10% of the housing units completed are physically inspected by DHS state monitors. Work orders are cross-checked with the measures that have been installed in the home. The technical monitors also evaluate the workmanship and techniques employed by weatherization contractors, focusing on compliance with weatherization priorities and the quality of work.

In addition to the annual assessments and regular field monitoring, DHS and CLEAResult will continue to hold Weatherization Manager Meetings and "NGRID Best Practices" meetings for subgrantees, DHS and utility representatives. These meetings serve as opportunities to discuss any programmatic changes, discuss areas of concern and general peer to peer exchange.

DHS will continue to hold daily "huddles" of the state monitoring team, and weekly staff meetings to review reports and monitoring findings from the previous week. The weekly meetings will be a chance to discuss trends, T&TA recommendations, best practices and more.

In PY 20, RI WAP plans to conduct the following analyses:

1. RI WAP plans to work with Hancock to collect and analyze data on CFM reductions for completed units. This data will be sorted by agency, by auditor, and by contractor.
2. RI WAP will also begin tracking Waiver Requests by agency and by auditor. This data will be used to adjust program guidelines, if necessary.
3. RI WAP will begin tracking Hancock "state approvals" by agency and by energy auditor to look for trends, and will also be used to adjust program guidelines, if necessary.

In response to the recent ACSI survey, DHS will continue to implement corrective actions particularly surrounding effective communication strategies. DHS has enlisted additional staff to support these efforts, and promote process improvement.

V.7 Health and Safety

DHS and its Weatherization subgrantees have always considered the health and safety of its weatherization clients a high priority. Health and Safety measures are measures that are necessary to maintain the physical well-being of both the occupants and the weatherization workers where the actions are necessary as a result of weatherization work. The reason for all health and safety work must be documented in the client file, including pictures and written documentation.

The 2020 RI WAP Health and Safety Plan, uploaded to the SF-424, is a working document and has been provided to all RI WAP subgrantees. The

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document will be updated as necessary, and follows all requirements of WPN 17-7.

For PY 20, 12% has been budgeted for DOE Health and Safety work. The WAP Hancock database allows the state and subgrantees to track and manage H&S measures and costs more efficiently. Additionally, Hancock has a feature whereby jobs that exceed the H&S average job funding limit (\$900) are sent to "state approval" before they can be sent to work order. This control allows the agencies, and DHS, to track Health and Safety averages and address any issues before a work order is created.

All weatherization jobs with a total cost greater than \$7,500, regardless of funding source, require a waiver from DHS. This policy allows DHS to monitor overall project costs, health and safety costs, IR costs etc. Waivers can only be signed by the DHS WAP Program Manager. A copy of the RI WAP IES Waiver Form has been uploaded to the SF 424.

Subgrantees are encouraged, but not required, to maintain Pollution Occurrence Insurance.

Clients must be informed of any Health and Safety risk discovered during the inspection process. In the case of a rental property, the property owner and/or authorized agent must also be notified. As potential hazards are identified, an assessment must be made on severity, and how they will be addressed, up to and including deferral. Deviations from the RI Health and Safety Plan must be requested in the form of a waiver, and must include a thorough assessment (including photo documentation) of the situation and a detailed plan for addressing the issue.

At-Risk Customers

RI WAP provides AC assistance through the Appliance Management Program. Any A-60 (discount rate) customers is eligible for AC replacement, if the InDemand audit (baseload audit) deems it cost effective. Window AC's are replaced with energy star models; almost all AC's are replaced. There is no assessment of an "at risk" situation; if the customer is income eligible, they are eligible to participate in the program. Window AC's are replaced 1:1 (eg. like for like).

The RI WAP IES "Audit Instructions Form" seeks to obtain customer health and safety information that may be affected by the weatherization work set to occur. If it is found that a customer may be considered "At Risk" based on the information provided, the job will be deferred for the health and safety of the customer.

V.8 Program Management

V.8.1 Overview and Organization

LIHEAP and WAP programs are under the jurisdiction of the Department of Human Services, Division of Community Services. DHS is an organization of opportunity, working hand-in-hand with other resources in Rhode Island to offer a full continuum of services for families, adults, children, elders, individuals with disabilities and veterans. The goals of DHS are to create families that are strong, productive, healthy and independent; adults that are healthy and reach their maximum potential; Children that are safe, healthy, ready to learn and reach their full potential; ensure that elders and individuals with disabilities receive a full continuum of services to enhance their quality of life; and that veterans are cared for and honored.

An organizational chart which show's RI WAP placement within the Department of Human Services has been uploaded to the SF-424.

An organizational chart for the Weatherization Assistance Program itself has been uploaded to the SF-424.

The State Energy Plan (SEP) program remains at the Office of Energy Resources in the RI Department of Administration. The Office of Housing and Community Development (OHCD) administers all CDBG grants awarded to the State of Rhode Island. The State Community Development Block Grant (CDBG) program is intended to develop viable communities by providing decent housing, expanding economic opportunities and creating suitable living environments - primarily for low/moderate income persons (those earning at or below 80% of Area Median Income). Each year the State of Rhode Island receives a formula allocation of CDBG funding from the Department of Housing and Urban Development (HUD) to be distributed to eligible Rhode Island communities.

The weatherization assistance program is operated by six community action agencies statewide. Historically, RI Community Action Agencies have implemented WAP at the local level with the exception of the multi-family program that was administered by RI Housing during the ARRA-era.

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V.8.2 Administrative Expenditure Limits

DHS will comply with the rules for administrative limits outlined in 10 CFR 440.18 which states that not more than 10% of any grant made to a state may be used by the grantee and subgrantee for administrative purposes in carrying out duties under this part, except that not more than 5% may be used by the state for such purposes, and not less than 5% must be made available to subgrantees by states.

V.8.3 Monitoring Activities

In accordance with 10 CFR 440, DHS, as the Grantee for the Weatherization Assistance Program, will perform monitoring and oversight of WAP program, and establish monitoring procedures for evaluating Subgrantee performance. Monitoring functions as the state's principal method for determining Subgrantee compliance and evaluating the effectiveness of WAP policies and procedures. All monitoring activities will be conducted in compliance with DOE WPN 15-4, the RI Weatherization Field Guide, the approved DOE state plan, the RI WAP/IES Operations Manual, and DOE WPN 20-4.

DHS program, fiscal, and technical staff will monitor Subgrantee activities to ensure that the highest quality weatherization services are provided to eligible low-income Rhode Islanders. Effective monitoring provides objective reporting to and from Subgrantees and makes recommendations to address program and administrative deficiencies and needs. Subgrantee monitoring is an on-going process which involves the coordinated and cooperative efforts of both DHS and its Subgrantees. DHS will make a coordinated effort to follow the updated monitoring approach outlined in WPN 20-4: Updated Weatherization Assistance Program Monitoring Guidance.

Subgrantee Programmatic and Management Monitoring includes the following areas: Subgrantee Review; Financial/Administrative; Equipment/Inventory/Materials; Eligibility; Rental; Feedback and Reporting; Energy Audits; Field Work; Health and Safety; Quality Assurance; Training and Technical Assistance; Staff or Entity performing the monitoring; and How monitoring results are handled and required follow-up procedures. Subgrantee Monitoring includes an evaluation of the following areas: Program Overview (Client File Review, Work Orders etc); Financial/Administration; Inventory; Energy Audits; Qualifications and Training; Weatherization of Units; Health and Safety; Final Inspections; Staff or entity performing the monitoring; and How monitoring results are handled and required follow-up procedures. Financial Monitoring will evaluate the following: Financial Management/Accounting Systems and Operations; Audits; Payroll/Personnel; Vehicles and Equipment; Procurement; Sub-awards/Subgrantee Monitoring; Invoicing; Records Retention; Staff or entity performing the monitoring and; How monitoring results are handled and required follow-up procedures.

Each subgrantee is required to submit a copy of their annual audit report to DHS within six (6) months of their fiscal close date. Those audit reports, along with their A-133 single audit are reviewed for findings. Any finding related to either the Weatherization Assistance Program (DOE or LIHEAP) and/or the Low Income Home Energy Assistance Program (LIHEAP) must be addressed in a corrective action plan to DHS. The state may take additional actions as it deems necessary.

During the grant period, DHS staff will conduct an annual comprehensive on-site monitoring visit to each Subgrantee. Monitoring tasks are shared by the DHS weatherization manager (Chief Program Development), three state monitors, and DHS Financial Management. This visit includes a review of client files, administrative systems, client priorities, leveraging activities, contractor procurement, utilization and file maintenance, technical procedures (energy audits, health and safety testing, work orders, contractor invoices, quality control inspections). The monitoring will also include a review by a state fiscal monitor to ensure the soundness of the subgrantees accounting systems so that grant funds are expended in accordance with applicable law, including regulations contained in 2 CFR 200, Weatherization Program Notices; and other procedures that DOE may issue. Whenever possible, WAP monitoring reviews will be coordinated with LIHEAP on-site monitoring to maximize utilization and efficiency of resources.

Findings such as waste, fraud, or abuse will be reported to DOE immediately.

Subgrantees are subject to removal from the program and will be defunded of all remaining allocations in the event that findings remain consistently non-compliant with either state or federal requirements. Such findings may include, but are not limited to: consistent sub-standard workmanship with no measureable improvement within 90 days of notification; inadequate fiscal or management policies, procedures, or enforcement of controls; failure to improve current management systems within stated notification timeframes and/or implementation of corrected policies, procedures and practices.

Technical field staff will review inventory (weatherization tools and equipment), and field work. Each subgrantee will be visited by a QCI certified* technical field monitor at least once per monitoring year to review no less than 10% of completed units and 10% of client files to ensure quality workmanship and that DOE guidelines are followed. Field monitors detail inspection findings on a "QCI Inspection Report", and provide a copy to the Subgrantee within 10 days whenever possible. If follow-up work is ordered, the agency will arrange for the necessary work to be performed, and notify the technical monitor once the

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work is complete. In all instances, If significant deficiencies are discovered, such as health and safety violations, poor quality of materials, major measures missed, DHS will require that the Subgrantee take appropriate corrective action to resolve the outstanding issues, usually within 30 days. The inspector will also increase the number of units reviewed and the frequency of monitoring visits for that CAP Agency until they can be assured that all deficiencies are resolved. Once deficiencies are corrected and procedures are put in place to prevent reoccurrence, DHS will resume its regular monitoring procedures for that agency.

DHS will conduct an exit conference at the close of each annual assessment and Subgrantees will be provided a written report that includes programmatic strengths, programmatic weaknesses, training needs and recommendations, and deficiencies requiring immediate attention. These reports will summarize the findings and, when necessary, direct the Subgrantees to take specific actions to correct issues of non-compliance and/or to develop a plan of action to improve performance. Monitoring reports are to be completed within 30 days of the visit whenever possible. Reports are sent to the CAP Agency Executive Director who must respond within 30 days and provide evidence or assurance, as appropriate, of all corrective actions taken. Monitoring reports will include a reminder that suspension of funding is possible if a Subgrantee fails to respond within the allowable time frame.

DHS has developed a "Subgrantee Monitoring Analysis Overview" in as described in WPN 20-4, using an Excel spreadsheet, which tracks and summarizes each Subgrantees' financial reviews, program monitoring reports, outstanding issues, and will identify each Subgrantees' needs, strengths, and weaknesses. By organizing state monitoring information onto one spreadsheet, DHS will be better able to gauge and measure success and improvements at the agencies from year to year.

DHS will also include a copy of the overview with its T&TA, Monitoring and Leveraging Report. As described in WPN 20-4, DHS will also provide information on: Subgrantees monitored; Any major findings (waste, fraud and abuse) and resolutions; Trends with respect to findings, concerns or other issues; Needed T&TA (programmatic/administrative, technical, financial); Any Subgrantees that are considered high risk and plan for how to resolve; and outcome activities involving T&TA and monitoring training.

ON-GOING TECHNICAL MONITORING

State monitors visit with subgrantees regularly to perform file reviews, conduct field inspections with contractors, auditors, and final inspectors; and provide technical assistance as necessary. The three technical monitors/inspectors at DHS devote a significant portion of their time to in-field monitoring activities including monitoring completed jobs (10%) and in-progress jobs, conducting contractor quality assurance reviews, providing on-site T&TA, resolution of auditor and contractor issues, addressing questions and concerns, responding to client complaints etc. Because of Rhode Island's small size, DHS field monitors have a strong presence out in the field and have developed strong working relationships with Subgrantee energy auditors and WAP contractors.

Technical monitors also inspect units "in progress" beyond the 10% completed units in order to assess: quality and compliance; appropriate and allowable materials; appropriateness of energy audits (no missed opportunities); comprehensive final inspections; safe work practices, such as lead safe weatherization protocols; and other factors that are relevant to on-site work.

Targeted training and technical visits are conducted if problems are identified, and until the issue or concern is resolved. Field monitors complete written field reports after each monitoring visit, and a copy is sent to the agency for their files. If there are any call backs as a result of the technical monitoring visit, the Subgrantee must provide DHS with the resolution of the call back. Monitoring visits are also used to identify problems and potential training opportunities. Call backs related to the work of WAP contractors are completed at no cost to WAP. If additional work that was not identified by the Subgrantee but is needed and is identified by DHS inspectors, and the unit has already been reported to DOE, no DOE funds can be used to complete the work. Typically, LIHEAP funds are used to cover such costs. DHS hopes to be able to track "go backs" in a more efficient way with the Hancock data base.

All field monitors have received extensive training in all aspects of weatherization including:

BPI Building Analyst Professional Certification;
Quality Control Inspector Training and Certification ;
Advanced Blower Door/Pressure Diagnostics Training;
Combustion Safety Training;
Thermal Imaging Camera Training;
EPA Lead RRP Certified Renovator;
Lead Safe Work Practices Training
OSHA Confined Space Training
ASHRAE 62.2 2016 Training
Advanced Air Sealing Training;
HEAT Audit Training;
Appliance Management Training;
CAZ/Worst Case Training

In addition to these formal trainings, the inspectors/monitors have also attended continuing education opportunities at HPC Conferences, local training

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opportunities (RI Building Code, RI Builders Association, CLEAResult etc.), CHP, NYSDWA, and others. Grantee T&TA funds are used to support personnel costs for the three technical monitors. 75% of grantee T&TA funds are used to support state monitoring.

***Quality Control Inspection**

RI WAP requires Quality Control inspection for every unit assisted through all weatherization programs. Every weatherized unit reported as a completed unit must receive a quality control inspection to ensure that all work meets the minimum specifications outlined in the SWS.

QCI Inspection Procedures

The following procedures are provided as a guide for performing the quality control inspection services:

1. QCI Inspector schedules an appointment with the customer to visit the dwelling and perform the inspection;
2. QCI Inspector arrives at dwelling equipped to conduct all necessary tests and services at the appointed time; Inspector performs blower door test verify results of air infiltration reduction achieved by the local agency; combustion efficiency test, and walk-through inspection as appropriate and required;
3. QCI Inspector records comments and quality assessment on the quality control form. Inspector also records variances in resource accountability between work order and/or invoice and inspection findings;
4. Signature of customer is obtained (signature must be a resident adult); and
5. Complete the Quality Control Inspection Form in the prescribed manner and forward a copy to the local agency.

The purpose of the Quality Control inspection is to:

- To provide services in a manner that meets the highest level of professionalism and to comply with standards established by DHS, the federal government, and the industry; and
- To provide services in a timely fashion and with the highest level of resource accountability possible in accordance with the scope of work provided.

The Subgrantee is responsible for ensuring that all Quality Control Inspectors are adequately trained and credentialed.

Quality Control Inspectors must be independent of the work they are inspecting. The Quality Control Inspector should not be the same individual who audited the property or performed any of the work for the property they are inspecting. In cases where the initial auditor and the QCI inspector are the same person, QCI inspections will be increased to ensure that audits are being performed consistently and correctly (10% minimum).

It is the responsibility of the Quality Control Inspector to ascertain the completeness and quality of work according to the work order, of each dwelling unit before certifying in the Hancock system that the unit is complete. BPI Technical Standards, The Rhode Island Weatherization Field Guide installation processes and SWS quality of standards should all be considered in this process.

At a minimum, Quality Control Inspections must contain these elements:

- Perform a blower door test to verify results of air infiltration reduction achieved;
- Perform a combustion efficiency test of the central heating system (fossil fuels) to verify results of furnace service contractor;
- Perform a walk-through inspection of the property to verify the presence of installed materials and that the installation of materials as recorded on the Work Order and Invoice documents meet SWS quality;
- Document customer comments and obtain customer signature on the Customer Quality Control form which verifying the work performed; and
- Certify completeness and quality of all items listed in the work scope in the Hancock system.

If the QCI Inspector finds a pattern of missing or poor quality work in the random sampling, a higher percentage or all dwelling units of that agency may be inspected.

“Poor” rated units must be resolved within five working days. Failure to adhere to this policy could result in the withholding of referrals, stopping payment on current invoices and, in extreme cases, suspension or removal from one or more of RI WAP/IES weatherization programs.

Acceptance of Work

To clarify standard inspection protocols, please note the following:

- A unit will fail inspection if materials reported as installed cannot be found;
- A unit will receive a poor QCI inspection if measures were not installed to standards;
- No unit will be failed for missed opportunities regarding air infiltration reduction, unless the inspector uses a blower door and can verify that substantial air leakage still exists;

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- A unit may fail if major weatherization services or leveraging opportunities were missed (e.g., no attic insulation installed and could have been, no furnace work performed etc.) and the file does not indicate why the service was omitted.
- A unit will fail if additional, uninstalled health and safety measures are still required to protect the family.

Customer "No-Show" Policy

It is anticipated that a small percentage of units will not receive Quality Control inspections due to a variety of extenuating circumstances including:

Customer moves/dies & property is vacant or occupied by a second party; or Customer is unavailable after several attempts to re-enter and inspect.

The following are the procedures for reporting "no show" properties:

1. Local agency completes the weatherization services and forwards the Work Order to the QCI Inspector.
2. QCI Inspector will be responsible for contacting landlords/property managers to seek assistance in completing the inspection process, as required.
3. QCI Inspector must make several attempts to enter the property, including:
 - a. Contacting the customer by telephone to schedule appointment;
 - b. Forwarding of a letter setting a time and date for the inspection;
 - c. Conducting an unscheduled site visit to the dwelling; and
 - d. In the case of rental properties, performing the previous steps with the landlord as well as the customer.

The QCI Inspector alerts DHS staff that the unit cannot be accessed and provides documentation of each attempt to contact. Units that do not receive a full QCI inspection may not be charged to DOE. NGRID or LIHEAP funds must be used.

V.8.4 Training and Technical Assistance Approach and Activities

In RI, training and technical assistance activities are directed at assessing and improving the overall delivery of weatherization services to income eligible households. Maximizing energy savings, minimizing production costs, improving program management, improving the technical skills of all weatherization workers (auditors and contractors), ensuring health and safety of weatherization workers and clients, and reducing the potential for waste, fraud and abuse are the overall goals of a comprehensive T&TA program.

The 2020 RI WAP T&TA Plan has been uploaded to the SF-424. The plan was developed in conjunction with CHP, state monitors, and network recommendations. On-site visits provide a key opportunity for identifying T&TA needs in the field. Training needs are assessed based on past monitoring reviews and findings, self-identified T&TA needs identified, and DOE Project Officer feedback or DOE program requirements.

All state monitors have received extensive training in all aspects of weatherization including:

- BPI Building Analyst Professional Certification
- QCI Training and Certification
- Advanced blower door/pressure diagnostics training
- Combustion Safety/Worst Case Scenario training
- Thermal Imaging Camera training
- Certified Lead Renovator
- ASHRAE 62.2 2016
- Advanced Air Sealing training
- HEAT audit training

Observations of trends during field monitoring are a determining factor in developing Single Topic training opportunities.

DHS has implemented weekly WAP monitoring meetings to review and track field and QCI reports. State monitors will provide copies of any field reports, post inspections, or QCI inspection reports and an overview of their findings. These reports will be tracked on a spreadsheet to identify auditor, agency, and

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contractor issues and trends. This feedback is also beneficial to other state monitors who may be facing similar issues and concerns with their agencies. DOE monitoring observations and recommendations are also factored into the development of RI's annual T&TA plan.

Attendance for all training is tracked in a database maintained by DHS. The database is also used to track renewals for licenses and certifications. See "Summary of Qualifications", uploaded to the SF-424.

DHS technical monitors use diagnostic equipment as a means to monitor weatherization work and train Subgrantee energy auditors and weatherization contractors. Infrared cameras, blower doors, gas leak detectors and combustion and carbon monoxide detectors are required and used extensively in monitoring of WAP. These tools are necessary to evaluate the the quality of weatherization work and assess health and safety concerns of the home. All Subgrantees are required to have blower doors and have been trained on its proper use. In addition, Subgrantees are required to use combustion efficiency test equipment, carbon monoxide detectors and gas leak detectors to help ensure health and safety concerns regarding combustion appliances are addressed. All subgrantees also have multiple infrared cameras to be used in conjunction with blower door testing to identify air leakage areas and as a quality assurance tool to verify that wall, slope and ceiling insulation and air sealing work was completed properly.

Energy Auditors

All energy auditors are required to have BPI Building Analyst Certification before performing any energy audits on their own. On a case by case basis, an energy auditor without BA certification may be allowed to perform energy audits independently. In all cases, DHS must approve this request and will ensure that audits are reviewed by a qualified person before a work order is issued. Throughout 2020, energy auditors and state monitors will attend HEP Energy Auditor training as needed.

Weatherization Auditor Requirements

1. BPI Building Analyst certification is required to perform audits for the RI WAP/IES program, unless prior approval has been obtained by DHS.
2. Rhode Island Lead Safe Renovator Remodeler certification (RRP) is required to perform Audits for the RI WAP/IES program. All Auditors must attend Lead Safe Work Practices training within six months of hire.
3. All energy auditors must have OSHA 10 certification.
4. All RI WAP/IES Weatherization Auditors must pass the National Grid Background Check
5. Auditors must possess and maintain proper use of all "*Required Tools for Weatherization Auditors*" listed n the RI WAP Operations Manual.

Quality Control Inspectors

A Quality Control Inspector (QCI Inspector) is an evaluator who verifies the work performed against the work plan, specifications and standards, performs building diagnostics, records/reports findings and concerns, and specifies corrective actions; by conducting a methodological audit/inspection of the building, performing safety and diagnostic tests, and by observing the retrofit work; in order to ensure the completion, appropriateness and quality of the work providing for the safety, comfort, and energy savings of the building occupants.

Quality Control Inspector (QCI) Requirements for DOE Funded Work

Quality Control Inspectors must be certified as Home Energy Professional Quality Control Inspectors for all DOE inspections.

There are 11 QCI inspectors in RI at this time, with each agency having at least one QCI inspector on staff. DHS will not limit the number of auditors that can receive the EA and QCI training and certification. To the greatest extent possible, LIHEAP funds will be used to supplement T&TA activities where DOE funding falls short.

RI WAP Implementation Plan for WPN 15-4

DOE WPN 15-4 describes requirements to support and verify quality work in the Department of Energy's (DOE) Weatherization Assistance Program (WAP). It defines what constitutes a quality installation of weatherization measures, outlines how those measures are inspected and validated, and prescribes acceptable training and credentialing of workers.

Due to the technical and changing nature of the Weatherization Assistance Program (WAP), a high priority has been placed on the training aspect of the

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program. Training and monitoring are the tools that RI WAP uses to ensure that weatherization measures are applied consistently and that Rhode Island maintains a high standard of work. Along with increasing flexibility in the combining of funds, RI WAP will implement training requirements to help ensure that monies provided are used on weatherization measures that will guarantee energy savings. By including all staff and contractors in this process, it will assure organizational performance while providing the means for evaluating our achievements, as well as developing plans to improve upon our successes.

In 2020, the majority of DOE Subgrantee T&TA funds will be used to support EA and QCI training and certification requirements. LIHEAP T&TA funds will be used to supplement Comprehensive and Specific trainings as needed.

If funding allows, RI will also offer HEP Crew Leader and Retrofit Installer training and certification to eligible RI WAP contractors. Contractors will be required to sign a retention agreement with the subgrantee. The retention agreement shall require that contractors will work in the program for a specific amount of time, and must align with the cost of the T&TA provided.

Subgrantees are provided T&TA funds with their HHS WAP and DOE Contracts. Subgrantees are required to utilize these resources to maintain and improve program operations across all levels of RI WAP. The subgrantee is responsible for tracking the compliance of its auditors with training requirements. Travel to attend training, is to be budgeted and charged to either the T&TA or administrative categories. Out-of-state travel for Subgrantee personnel requires prior written approval by DHS if not included in the T&TA Plan.

Training for all WAP workers (aligned with the NREL JTA for the position in which the worker is employed) will be phased in. In PY 2020, "Comprehensive" training will be focused primarily on EA and QCI training and certification for all energy auditors and state monitors. If a mandatory training is missed, the individual must re-schedule the training on their own, or take the class/course online. DHS will determine what trainings are mandatory. Attendance for all training is tracked.

Comprehensive Training (formerly called Tier 1 training)

Comprehensive training is occupation-specific training which follows a curriculum aligned with the JTA for that occupation. Comprehensive training must be administered by, or in cooperation with, a training program that is accredited by a DOE-approved accreditation organization for the JTA being taught. All DOE funded Comprehensive training will be provided by DOE-approved accredited training programs. Accredited training can be administered in a number of ways including traveling training programs, distance learning programs and other options approved by DOE. All Weatherization field staff may receive regular Comprehensive training. Trainings will be based on an analysis of training needs and a plan for meeting those needs over a defined period of time, which can span multiple Program Years.

Specific Training (formerly called Tier 2 training)

Specific Training is single-issue, short-term, training to address acute deficiencies in the field such as dense packing, ASHRAE 62.2 2016, etc. Conference trainings are included in this category. DHS will initiate Specific Training from time to time. These trainings can take place in the field, at a subgrantee's office, college or technical school or other locations.

DHS will hold its annual training (usually in the Fall) on proper placement of smoke and CO detectors in conjunction with the State Fire Marshal's Office. This training is strongly encouraged, but not mandatory for all weatherization staff. Seasoned staff that have been with the weatherization program for many years are well-versed in this topic, and for many is just a refresher. This training will be mandatory for energy auditors who have not previously taken this training.

DHS will also assess subgrantee and contractor compliance with OSHA requirements. All crew/contractor leaders/supervisors are required to attend a 30-hour OSHA construction training and must attend future trainings to maintain currency as indicated by OSHA. Subgrantees may utilize their T&TA funds to attend necessary trainings to comply with this and other requirements and to monitor their contractors to ensure this requirement is being followed.

The final component of our T&TA objectives is client education and outreach. This critical component enables DHS to learn directly from our clients how satisfied they are with the work performed and also enables our state monitors to follow up on client education about reducing their energy consumption. All RI WAP customers are provided with a self-addressed and stamped "Client Satisfaction Card" at the post inspection. All customers are given the customer satisfaction card, regardless of the funding source. A copy of the card has been uploaded to the SF-424. CLEAResult compiles all responses on a spreadsheet, and shares results with DHS and Subgrantees. At the final inspection, the customer is given a copy of the Hancock Energy Savings Report for the weatherization work completed. Each energy auditor has a portable printer and Ipad for convenience in providing this important report.

In addition, client education packets have been provided to all Subgrantees and include materials such as: *The Lead Safe Certified Guide to Renovate Right (required for every weatherization job)*; *Brief Guide to Mold and Moisture and the Home*; *Save Energy on Your Own*; *Top 10 Ways Homeowners Can Ensure Good Air Quality*; *EPA's Citizen's Guide to Radon*; *Asbestos Safety Information*; *Top 20 Asbestos Questions*; *An Overview of Domestic Hot*

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Water Tanks; Electrical Safety Workbook and Seven Tips for Keeping a Healthy Home. These materials will be distributed to customers as needed, and are included as an Appendix to the RI WAP Operations Manual. Other client education materials will be added or updated to the materials portfolio as necessary.

Weatherization Manager Meetings

DHS and CLEAResult will continue to hold Weatherization Manager Meetings throughout 2020. WM meetings occur every six weeks, and are held at either a CAP agency, DHS or at the CLEAResult Office in Providence. DOE updates are a standing agenda item. WMM agendas are developed in advance by CLEAResult and DHS, and subgrantees are invited to recommend agenda items for review and discussion as well. The WMM appointees are also charged with review of the RI Weatherization Field Guide to ensure compliance with the SWS. In addition, National Grid holds quarterly "Best Practices" meetings which all subgrantees, CLEAResult and DHS attend.

DHS does not collect data on actual energy savings. Subgrantee effectiveness is determined by reviewing monthly production, in-field technical monitoring observations, annual monitoring, WTC meetings, job cost reports, customer survey cards, and more. T&TA activities are developed based on these elements, and are usually mandatory for all energy auditors and state monitors.

DHS will develop and submit as required an Annual Training and Technical Assistance Report which describes the T&TA activities covered during the grant period.

Percent of overall trainings

Comprehensive Trainings:	70.0
Specific Trainings:	30.0

Breakdown of T&TA training budget

Percent of budget allocated to Auditor/QCI trainings:	100.0
Percent of budget allocated to Crew/Installer trainings:	0.0
Percent of budget allocated to Management/Financial trainings:	0.0

V.9 Energy Crisis and Disaster Plan

Energy Crisis Relief (ECR)

DHS will comply with WPN 12-7: "Revised Guidance on Weatherization Disaster Guidance and Relief". Rhode Island currently utilizes LIHEAP funds for our Energy Crisis Relief (ECR) program. The activities and measures that will be performed under ECR are, but not limited to, repair of heating systems, replacement of irreparable heating systems, repair of gas or other fuel lines, pipe thawing service, and loans of auxiliary heaters. Because of LIHEAP and NGRID funding for emergency boiler repair and replacement, DHS does not foresee the need to use DOE WAP funds for an emergency crisis program.

2020 RI WAP Health and Safety Plan

1.0 General Information

Rhode Island's Weatherization Program Operations Manual (OM) addresses Health and Safety (H&S) in accordance with 10 CFR 440.16(h), 440.18(d)(15), 440.21(5), and the Department of Energy's (DOE) most recent Health and Safety Guidance in Weatherization Program Notices (WPN) 17-7.

Rhode Island's Department of Human Services (DHS) budgets health and safety costs as a separate category from Program Operations and, thereby, excludes such costs from the Savings to Investment Ratio (SIR) and the average cost per-unit (ACPU) calculation.

Allowable energy efficiency-related health and safety actions are those actions necessary to maintaining the physical well-being of both the occupants and/or weatherization workers where:

Costs are reasonable and are in accordance with Rhode Island's approved State Plan; AND
The actions must be taken to effectively perform weatherization work; OR
The actions are necessary as a result of weatherization work.

Not all observed health and safety conditions need to be corrected in order to proceed with weatherization; however, the client will still be notified of any observed conditions and if the condition is not corrected, it should be clearly explained in the client's electronic file in Hancock how the condition is not related to the planned weatherization work.

2.0 - Budgeting

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

Select which option is used below	
Separate Health and Safety Budget	☒ Contained in Program Operations ☐

3.0 - Health and Safety Expenditure Limits

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

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

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

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

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

4.0 - Incidental Repair Measures

If Grantees choose to identify any H&S measures as incidental repair measures (IRMs), they must be implemented as such under the Grantee's weatherization program in all cases-meaning, they can never be applied to the H&S budget category. In order to be considered IRMs, the measure must fit the following definition and be cost justified along with the associated efficiency measure;

Incidental Repairs means those repairs necessary for the effective performance or preservation of weatherization materials. Such repairs include, but are not limited to, framing or repairing windows and doors which could not otherwise be caulked or weather-stripped and providing protective materials, such as paint, used to seal materials installed under this program. (10CFR440'Definitions')

Rhode Island's state plan defines Incidental Repair Measures are those repairs necessary for the effective performance or preservation of weatherization materials. Such repairs include, but are not limited to, framing or repairing windows and doors which could not otherwise be caulked or weather- stripped and providing protective materials, such as paint, used to seal materials installed under this program.

The following measures are always to be charged as "incidental repairs". An incidental repair must be

associated with a specific ECM (Incidental to an ECM) and cost justified to ensure that the whole project achieves an SIR of one or greater. Incidental repairs are NOT to be charged to Health and Safety.

- Framing or Repairing of windows and doors which could not otherwise be caulked or weather stripped, including protective materials such as paint, used to seal materials installed. An example would be a water damaged window, door trim, or framing that needs to be replaced to prevent moisture infiltration into the building.
- Minor roof repairs, not to exceed \$500.
- Minor structural repairs that are necessary to allow for effective weatherization, not to exceed \$500.
- Knob and Tube removal, including the installation of replacement wiring, for protection of and safety of, insulation measures (reasonable amount). Knob and tube inspections performed by a properly licensed electrician are allowable.
- Minor electrical repairs necessary for the effective installation of, or because of the installation of electronic weatherization measures. Installation of miscellaneous wiring, junction boxes and covers to ensure connections which meet code is allowed.
- Cut access holes.
- Remediation of conditions that may lead to or promote biological concerns are allowed as incidental repairs. DOE funds may not be used to test, abate, remediate, purchase mold-specific insurance, or alleviate existing mold conditions.
- Allowable measures include: installation or repair of gutters, downspouts, downspout splash blocks or extensions when basements/crawl spaces have evidence of moisture infiltration; installation of flashing to direct water away from the building or foundation where evidence of moisture damage due to long term water damage is evident; installation of moisture/vapor barriers over dirt floors; minor repairs to plumbing or sanitary leaks inside the home or plumbing leaks outside the home such as hose bibs (garden home faucets) that may be leaking and draining against the foundation; repairs that are required by code as a result of installing a weatherization measure and are a direct component of the weatherization measure being installed.

The cost of incidental repairs must be included in the cost of the package of measures and must be cost justified in the whole house SIR. All incidental repair work must be performed in a lead safe manner as prescribed by the RI Department of Health.

5.0 - Deferral/Referral Policy

Deferral of services may be necessary if H&S issues cannot be adequately addressed according to WPN 17-07 guidance. The decision to defer work in a dwelling is difficult but necessary in some cases. This does not mean that assistance will never be available, but that work must be postponed until the problems can be resolved and/or alternative sources of help are found. If, in the judgment of the auditor, any conditions exist which may endanger the health and/or safety of the workers or occupants, the unit should be deferred until the conditions are corrected. Deferral may also be necessary where occupants are uncooperative, abusive, or threatening. Grantees must be specific in their approach and provide the process for clients to be notified

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

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

Where can this deferral/referral policy be accessed?

Rhode Island's state plan allows for deferral of weatherization services if Health and Safety issues cannot be adequately addressed. Deferral does not mean that the home cannot or will not be weatherized, but that the work must be postponed until the problems leading to the deferral are corrected. Auditors must use professional judgment when determining if there are conditions present which may endanger the health/safety of the workers or occupants. Subgrantee staff are expected to refer clients to alternate sources of assistance (such as CDBG or home repair programs) where appropriate. Deferral may also be necessary where occupants are uncooperative, abusive or threatening. DHS has developed a standardized "Deferral of Weatherization Services" Form for subgrantee use. The form includes pertinent information such as the client name and address; date of the audit; date the client was informed; a clear description of the problem(s) and conditions under which weatherization could continue. A copy of the Deferral Notice is attached as an appendix to this plan.

6.0 - Hazard Notification and Identification Forms

Documentation forms must be developed that include at a minimum: the client's name and address, dates of the audit/assessment and when the client was informed of a potential H&S issue, a clear description of the problem, a statement indicating if, or when weatherization could continue, and the client(s) signature(s) indicating that they understand and have been informed of their rights and options.

Documentation Form(s) have been developed and comply with guidance?	
Yes ☒	No ☐

Before beginning work on a home, subgrantees must take into consideration any health concerns of the occupants, the condition of the dwelling, and the possible effect of weatherization work on the health or medical condition of the dwelling's occupants.

Some health problems can be exacerbated by weatherization activities, and precautions shall be taken when applicable to avoid exacerbating preexisting health conditions. Weatherization services must be provided in a manner that minimizes risk to workers and clients. Occupants will be required to reveal known or suspected health concerns. Subgrantees shall specifically request, and document, pre-existing health conditions of all occupants. This information will be obtained during the energy audit, and if there is a potential health effect, the auditor will determine what steps will be taken to ensure that weatherization work will not worsen the occupants' health condition.

Subgrantees are required to complete the "Audit Instructions" Form for each weatherization job.

RI WAP also uses a "Liability Disclaimer" which notes any substances and/or conditions discovered during the audit. Any conditions reported, and the associated actions taken, if any, shall be documented in the job file.

Client Education Materials

Brief Guide to Mold, Moisture and Your Home

<https://www.epa.gov/sites/production/files/2014-08/documents/moldguide.pdf>

Top 10 Ways Homeowners Can Ensure Good Indoor Air Quality

https://www.google.com/?gws_rd=ssl#safe=strict&q=ashrae.org+top+10+ways+homeowners+can+ensure+good+indoor+air+quality

Seven Tips for Keeping a Healthy Home

<http://www.hud.gov/offices/lead/library/hhi/Hea1thyHomes7Steps.pdf>

7.0 - Health and Safety Categories

For each of the following H&S categories Identified by DOE:

- Explain whether you concur with existing guidance from WPN 17-07 and how that guidance will be implemented in your Program. If you are proposing an alternative action/allowability, or If the identified category will not be addressed and will always result in deferral. Alternatives must be comprehensively explained and meet the intent of DOE guidance.
- Where an Action/Allowability or Testing is "required" or "not allowed" through WPN 17-0 Grantees must concur or choose to defer all units where the specific category is encountered.
- Allowable items under WPN 17-07 leave room for Grantees to determine if the category or testing will be addressed and in what circumstances.
- Declare whether DOE funds or alternate funding source(s) will be used to address the particular category.
- Describe the explicit methods to remedy the specific category.
- Describe what testing protocols (If any/ will be used.
- Define minimum thresholds that determine minor and major repairs
- Identify minimum documentation requirements for at-risk occupants
- Discuss what explicit steps will be taken to educate the client, if any, on the specific category If this is not explained elsewhere in the Plan. Some categories like mold and moisture require client education.
- Discuss how training and certification requirements will be provided for the specific category. Some categories like Lead Based Paint require training.
- Describe how occupant health and safety concerns and conditions will be solicited and documented

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

7.1 - Air Conditioning and Heating Systems

Concurrence, Alternative, or Deferral		
Concurrence with Guidance ☐	Alternative Guidance ☒	Results in Deferral ☐
Air Conditioning Unallowable Measure ☐	Heating Unallowable Measure ☐	

Funding				
DOE ☐	LIHEAP ☒	State ☐	Utility ☒	Other ☐

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

RI WAP does not use DOE funds for heating system repair and replacement. National Grid and HHS WAP funds are used to address heating work.

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

N/A

Indicate Documentation Required for At-Risk Occupants

While DOE funds are never used for air conditioning and heating systems in RI, DHS does identify at-risk customers during the auditing and intake process. Refer to "Audit Instructions" form which solicits information on any household health concerns.

Testing Protocols

N/A

Client Education

N/A

Training

RI has conducted and will continue to facilitate statewide heating system-related trainings for energy auditors and state monitors. Examples of such trainings include: Heating 101 (including instruction on the proper sizing of heating equipment), Heat Pump Water Heater Certification, BPI Heating Professional certification training at NYSWDA, and Mini-Split training for auditors, state monitors and heating contractors.

7.2 - Asbestos - All

What is the blower door testing policy when suspected Asbestos Containing Material (ACM) is identified?

Blower door testing is not allowed when friable asbestos or vermiculite is identified, and the job must be deferred.

7.2a – Asbestos – in siding, walls, ceilings, etc.

Concurrence, Alternative, or Deferral		
Concurrence with Guidance ☐	Alternative Guidance ☒	Results in Deferral ☐

Funding				
DOE ☐	LIHEAP ☒	State ☐	Utility ☒	Other ☐

How do you address suspected ACM's in siding, walls, or ceilings that will be disturbed through the course of weatherization work?

- Take all reasonable and necessary precautions to prevent asbestos contamination in the home.
- Blower door testing where friable suspected asbestos, and/or vermiculite is present is not allowed. "Friable" means the material can be crumbled, pulverized, or reduced to powder by the pressure of an ordinary human hand. Grantees seeking guidance on safe policies and procedures should contact training providers or a local asbestos action office for technical support.
- The existence of asbestos siding that is in good condition does not prevent installing dense- pack insulation from the exterior. Siding may be removed and reinstalled in order to perform the ECM, and the associated costs may be charged as part of the ECM. Any disturbance to asbestos siding must be performed by a certified professional, or competent person.

https://health.ri.gov/programs/detail.php?pgm_id=4

Testing Protocols

Visually inspect exterior wall surface and subsurface, floors, walls, and ceilings for suspected ACM prior to drilling or cutting.

Client Education

Inform the client in writing that suspected ACMs are present and provide client education.

<https://www.epa.gov/asbestos/protect-your-family>

Training and Certification Requirements

Training on how to recognize ACM.

7.2b – Asbestos – in Vermiculite

Concurrence, Alternative, or Deferral		
Concurrence with Guidance ☐	Alternative Guidance ☒	Results in Deferral ☐

Funding				
DOE ☐	LIHEAP ☒	State ☐	Utility ☒	Other ☐

- When vermiculite is present, assume it contains asbestos unless testing determines otherwise.
- Do not perform a blower door test
- Removal is not allowed.

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

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

Defer unless testing by a certified professional proves that the vermiculite does not contain asbestos. The customer is responsible for testing by a certified professional.

Testing Protocols

RI WAP does not pay for asbestos testing.

Client Education

- Instruct clients in writing not to disturb suspected ACM.
- Provide asbestos safety information to the client

Training and Certification Requirements

RI WAP has included an "Asbestos Awareness" training in its 2020 T&TA Plan. The training will be offered to all weatherization workers, contractors, energy auditors, QCI inspectors and state monitors.

7.2c – Asbestos – on pipes, furnaces, other small covered surfaces

Concurrence, Alternative, or Deferral		
Concurrence with Guidance ☒	Alternative Guidance ☐	Results in Deferral ☐

Funding				
DOE ☐	LIHEAP ☒	State ☐	Utility ☐	Other ☐

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

- If "friable" asbestos or vermiculite is present, a blower door test may not be performed, and the job must be deferred. "Friable" means the material can be crumbled, pulverized, or reduced to powder by the pressure of an ordinary human hand.
- Assume asbestos is present in suspect covering materials.
- When suspected friable ACM is present, take precautionary measures as if it is asbestos unless testing determines otherwise.

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

Testing Protocols

Visual assessment of suspected ACMs.

Client Education

- Instruct clients in writing not to disturb suspected ACM.

- Provide asbestos safety information to the client.

Training and Certification Requirements

RI WAP has included an "Asbestos Awareness" training in its 2020 T&TA Plan. The training will be offered to all weatherization workers, contractors, energy auditors, QCI inspectors and state monitors.

7.5 – Biologicals and Unsanitary Conditions

(odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.)

Concurrence, Alternative, or Deferral		
Concurrence with Guidance ☐	Alternative Guidance ☒	Results in Deferral ☐

Funding				
DOE ☒	LIHEAP ☐	State ☒	Utility ☒	Other ☐

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

- Addressing bacteria and viruses is not an allowable cost.
- Deferral may be necessary in cases where conditions in the home pose a health risk to occupants and/or weatherization workers.

Testing Protocols

Sensory inspection

Client Education

- Inform client in writing of observed conditions.
- Provide information on how to maintain a sanitary home.

Brief Guide to Mold, Moisture and Your Home

<https://www.epa.gov/sites/production/files/201408/documents/moldguide.pdf>

Seven Tips for Keeping a Healthy Home

<http://www.hud.gov/offices/1ead/library/hhi/HealthyHomes7Steps.pdf>

Training

Training on Biological and Unsanitary Conditions will be scheduled for 2020 given the Covid pandemic and enhanced focus on health and safety.

7.6 - Building Structure and Roofing

Concurrence, Alternative, or Deferral					
Concurrence with Guidance	☐	Alternative Guidance	☒	Results in Deferral	☐

Funding									
DOE	☐	LIHEAP	☒	State	☐	Utility	☒	Other	☐

What guidance do you provide Subgrantees for dealing with structural issues (e.g., roofing, wall, foundation) in homes slated for weatherization?

- Building rehabilitation is beyond the scope of the Weatherization Assistance Program.
- Homes that require more than minor repairs must be deferred.
- Ensure that access to the portions of the home where weatherization will occur are safe for entry and performance of assessments, work, and inspections.

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

The cost of incidental repairs must be included in the cost of the package of measures and must be cost justified in the whole house SIR.

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

N/A

Client Education

Notify client in writing of structurally compromised areas.

Training

DHS will ensure that training on building structure and roofing is included in any comprehensive training provided to the network in 2020.

7.7 – Code Compliance

Concurrence, Alternative, or Deferral					
Concurrence with Guidance	☐	Alternative Guidance	☒	Results in Deferral	☐

Funding									
DOE	☐	LIHEAP	☒	State	☐	Utility	☒	Other	☐

What guidance do you provide Subgrantees for dealing with code compliance issues in homes receiving weatherization measures?

Eligible code compliance measures are repairs that are required by code as a result of installing an energy conservation measure and are the direct component of the energy conservation measure being installed. General Repair, not Health & Safety, must be charged when the repair is a component of an energy conservation measure.

State and local codes must be followed while installing energy conservation measures. It is the Auditor's responsibility to ensure that all energy conservation related work conforms with applicable codes in the jurisdiction where the work is being performed.

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.

Testing Protocols

Visual inspection

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

- Heating system repair and replacement
- Electrical issues
- Plumbing issues
- Ductwork
- Exhaust fans
- Combustion appliance safety (vent system sizing, materials, clearances, and installation)
- Smoke/CO detector installations,
- Chimney liners
- Unvented space heaters
- Fireomatic switches
- Exterior water heater closets with a combustion appliance

Client Education

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

Training

RI WAP has included training on Code Compliance in its T&TA Plan to ensure that workers, Energy Auditors, Quality Control Inspectors and state technical monitors are knowledgeable of current state and local building codes.

7.8 - Combustion Gases

Concurrence, Alternative, or Deferral				
Concurrence with Guidance ☐	Alternative Guidance ☒	Results in Deferral ☐		

Funding				
DOE ☒	LIHEAP ☒	State ☐	Utility ☒	Other ☐

How are crews instructed to handle problems discovered during testing, and what are the specific protocols for addressing hazards that require an immediate response?

- Proper venting to the outside for combustion appliances, including gas dryers and refrigerators, furnaces, vented space heaters and water heaters is required.
- Correct venting when testing indicates a problem.

Testing Protocols

- Combustion safety testing is required when combustion appliances are present.
- Test naturally drafting appliances for spillage and CO during CAZ depressurization testing pre- and post-weatherization and before leaving the home on any day when work has been done that could affect draft (e.g., tightening the home, adding exhaust).
- Inspect venting of combustion appliances and confirm adequate clearances.

Client Education

Provide client with combustion safety and hazards information.

Training

Training on conducting proper combustion testing has been provided for all energy auditors. State monitors continue to provide T&TA as needed for newer auditors. If state monitoring reveals a need for additional CAZ testing, DHS will arrange for single topic training with a network trainer. DHS will ensure that any comprehensive training provided includes combustion safety.

7.9 - Electrical

Concurrence, Alternative, or Deferral		
Concurrence with Guidance ☐	Alternative Guidance ☒	Results in Deferral ☐

Funding				
DOE ☐	LIHEAP ☒	State ☐	Utility ☒	Other ☐

What guidance do you provide Subgrantees for dealing with electrical hazards, including knob & tube wiring, in homes slated for weatherization?

When the H&S of the occupant/worker(s) is at risk, minor repairs are allowed when necessary for weatherization measures.

When Knob & Tube (K&T) wiring is present in the home, it must be determined if the K&T is active or inactive. Active K&T may be determined by the Auditor. Inactive K&T wiring must be documented by a licensed RI electrician.

Active K&T requires the following protocols: Walls that have active K&T present anywhere in the wall must be inspected (scoped) to ensure that any bays with K&T wiring, vertical or horizontal, cannot be insulated. Bays that are inspected (scoped) and determined by the insulation contractor to be free of K&T wiring may be insulated provided that the wall is otherwise suitable for insulating. Attics that have active K&T must have the K&T removed or dammed to avoid

contact between the insulation and the K&T wiring. The preferred method is to remove K&T but there are budget restrictions, the cost to remove sections of Attic K&T and replacing the circuit is limited to \$1,500. All electrical work must be performed by a RI licensed electrician.

Attic with active K&T where removal and replacement exceeding \$1,500 may have insulation installed using an insulation dam to provide a minimum of 2" clear space between the wire and the insulation.

Cost associated with testing for K&T is a Health and Safety expense. Cost associated with testing removal of K&T wiring in attics or damming around the live K&T is an incidental repair expense. An incidental repair must be associated with a specific ECM and cost justified to ensure that the whole project achieve an SIR of one or greater. Incidental repairs are not to be charged to Health and Safety.

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

The cost of repairs must be included in the cost of the package of measures and must be cost justified in the whole house SIR.

Testing Protocols

When Knob & Tube (K&T) wiring is present in the home, it must be determined if the K&T is active or inactive. Active K&T may be determined by the Auditor by a visual inspection and by using a tic tester. Inactive K&T wiring must be documented by a licensed RI electrician. Inactive K&T can be ignored.

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

N/A

Client Education

When electrical issues are the cause of a deferral, provide information to client on over current protection, overloading circuits, and basic electrical safety/risks.

Electrical Safety Workbook

<http://files.esfi.org/file/-Electrical-Safety-Workbook-E4A3.pdf>.

Training

RI WAP has included Electrical Safety in its 2020 T&TA Plan for Energy Auditors, Quality Control Inspectors and state technical monitors.

7.10 - Formaldehyde, Volatile Organic Compounds (VOCs), Flammable Liquids, and Other Air Pollutants

Concurrence, Alternative, or Deferral				
Concurrence with Guidance ☒	Alternative Guidance ☐	Results in Deferral ☐		

Funding				
DOE ☒	LIHEAP ☒	State ☐	Utility ☒	Other ☐

What guidance do you provide Subgrantees for dealing with formaldehyde, VOCs, flammable liquids, and other air pollutants identified in homes slated for weatherization?

- Removal of pollutants is allowed and is required if they pose a risk to workers.
- If pollutants pose a risk to workers and removal cannot be performed or is not allowed by the client, the unit must be deferred.

Testing Protocols

Sensory inspection

Client Education

- Inform client in writing of observed hazardous condition and associated risks.
- Provide client written materials on safety issues and proper disposal of household Pollutants

Seven Tips for Keeping a Healthy Home

<http://www.hud.gov/offices/lead/library/hhi/HealthyHomes7Steps.pdf>

RI WAP has included training "Indoor Air Pollutants" training in its 2020 T&TA Plan. The training will be offered to all weatherization workers, contractors, energy auditors, QCI inspectors and state monitors

7.11 – Fuel Leaks

Concurrence, Alternative, or Deferral				
Concurrence with Guidance ☐	Alternative Guidance ☒	Results in Deferral ☐		

Funding				
DOE ☐	LIHEAP ☒	State ☐	Utility ☒	Other ☐

Remediation Protocols

- When a minor gas leak is found on the utility side of service, the utility service must be contacted before work may proceed.
- Fuel leaks that are the responsibility of the client (vs. the utility) must be repaired before

weatherizing a unit.

- Notify utilities and temporarily halt work when leaks are discovered that are the responsibility of the utility to address.

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

The most dangerous combustion gas commonly encountered in weatherization is carbon monoxide. Combustion safety testing is required when combustion appliances are present. Safety tests on combustion appliances is done before and after air sealing. The tests include checking carbon monoxide levels in the flue/vent of vented appliances and near the exhaust of unvented appliances; examining draft-ability of flues; start-up spillage at flues, adequacy of combustion air and testing for fuel leaks.

The repairs must be included in the cost of the package of measures and must be cost justified in the whole house SIR.

Testing Protocols

- Test exposed gas lines for fuel leaks from utility coupling into, and throughout, the home.
- Conduct sensory inspection on bulk fuels to determine if leaks exist.

Client Education

Inform clients in writing if fuel leaks are detected.

Training

DHS will ensure that any comprehensive training provided to the network in 2020 includes training on identifying fuel leaks.

7.12 – Gas Ovens/Stovetops/Ranges

Concurrence, Alternative, or Deferral		
Concurrence with Guidance ☐	Alternative Guidance ☒	Results in Deferral ☐

Funding				
DOE ☒	LIHEAP ☒	State ☐	Utility ☒	Other ☐

What guidance do you provide Subgrantees for addressing unsafe gas ovens/stoves/ranges in homes slated for weatherization?

- When testing indicates a problem, entities may perform standard maintenance on or repair gas cooktops and ovens.
- Replacement is allowed on a case by case basis, with waiver approval.

Testing Protocols

- Test gas ovens for CO.
- Inspect cooking burners and ovens for operability and flame quality.

Client Education

Inform clients of the importance of using exhaust ventilation when cooking and the importance of keeping burners clean to limit the production of CO.

Training

It is expected that this topic will be covered in Energy Auditor (EA) training. DHS will ensure that CO testing and related protocols are included in any comprehensive training provided to the network.

7.13 – Hazardous Materials Disposal (Lead, Refrigerant, Asbestos, Mercury (including thermostats, CFLs/fluorescents, etc.)

Concurrence, Alternative, or Deferral		
Concurrence with Guidance ☒	Alternative Guidance ☐	Results in Deferral ☐

Funding				
DOE ☒	LIHEAP ☒	State ☐	Utility ☒	Other ☐

What guidance do you provide Subgrantees for addressing Hazardous Waste Disposal?

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.

Testing Protocols

N/A

Client Education

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

Training

RI WAP has included an "Indoor Air Pollutants" training in its 2020 T&TA Plan. The training will be offered to all weatherization workers, contractors, energy auditors, QCI inspectors and state monitors.

Disposal Procedures and Documentation Requirements

- Hazardous Waste Materials generated in the course of weatherization work shall be disposed of according to all local laws, regulations and/or Federal guidelines, as applicable.
- Document proper disposal requirements in contract language with responsible party.

7.14 Injury Prevention of Occupants and Weatherization Workers

(Measures such as repairing stairs and replacing handrails)

Concurrence, Alternative, or Deferral		
Concurrence with Guidance ☒	Alternative Guidance ☐	Results in Deferral ☐

Funding				
DOE ☐	LIHEAP ☒	State ☐	Utility ☒	Other ☐

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

When necessary to effectively weatherize the home, workers may make minor repairs and installations.

How do you define "minor" or allowable injury prevention measures, and at what point are repairs considered beyond the scope of weatherization? Quantify "minor" or allowable injury prevention measures.

Injury prevention measures are allowed - repairs or installations must be included in the cost of the package of measures and must be cost justified in the whole house SIR.

Testing Protocols

Visual inspection for dangers that would prevent weatherization.

Client Education

If conditions will not be repaired, inform client in writing of observed hazards and associated risks.

Training

It is expected that this topic will be covered in Energy Auditor (EA) training. DHS will ensure that injury prevention is included in any comprehensive training provided in 2020.

7.15 – Lead Based Paint

Concurrence, Alternative, or Deferral		
Concurrence with Guidance ☒	Alternative Guidance ☐	Results in Deferral ☐

Funding				
DOE ☒	LIHEAP ☒	State ☐	Utility ☒	Other ☐

Safe Work Protocols

- Crews must follow EPA's Lead; Renovation, Repair and Painting Program (RRP) when working in pre-1978 housing unless testing confirms the work area to be lead free.
- Deferral is required when the extent and condition of lead-based paint in the house would potentially create further H&S hazards.

- Only those costs directly associated with the testing and lead safe practices for surfaces directly disturbed during weatherization activities are allowable.
- Documentation in the client file must include Certified Renovator certification; any training provided on-site; description of specific actions taken; lead testing and assessment documentation; and, photos of site and containment set up. Include the location of photos referenced if not in file.

Testing Protocols

- Testing to determine the presence of lead in paint that will be disturbed by WAP measure installation is allowed with EPA-approved testing methods.
- Testing methods must be economically feasible and justified.
- Job site set up and cleaning verification by a Certified Renovator is required.
- State monitors must verify that crews are using lead safe work practices during monitoring

Client Education

Follow pre-renovation education provisions for RRP.

Lead Safe Guide to Renovate Right

<https://www.epa.gov/sites/production/files/documents/renovaterightbrochure.pdf>

Training and Certification Requirements

- All employees and contractors working on pre-1978 homes must receive training to install measures in a lead-safe manner in accordance with the SWS and EPA protocols, and installation must be overseen by an EPA Certified Renovator.
- State Monitors and Inspectors must be Certified Renovators.

Documentation Requirements

- Provide a copy of all Certified lead Firm documentation required by contractor to Subgrantee and the client.
- Provide clients with the pamphlet "Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools", and certify that they received the form.

7.16 – Mold and Moisture

(Including but not limited to drainage, gutters, down spouts, extensions, flashing, sump pumps, dehumidifiers, landscape, vapor retarders, moisture barriers, etc.)

Concurrence, Alternative, or Deferral				
Concurrence with Guidance ☒	Alternative Guidance ☐	Results in Deferral ☐		

Funding				
DOE ☒	LIHEAP ☒	State ☐	Utility ☒	Other ☐

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

- Limited water damage repairs that can be addressed by weatherization workers are allowed when necessary in order to weatherize the home and to ensure the long-term stability and durability of the measures.
- Source control (i.e. correction of moisture and mold creating conditions) is allowed when necessary in order to weatherize the home and to ensure the long-term stability and durability of the measures. Source control is independent of latent damage and related repairs.
- Where severe Mold and Moisture issues cannot be addressed, deferral is required.
- Mold cleanup is not an allowable H&S cost.
- Surface preparation where weatherization measures are being installed (e.g., cleaning mold off window trim in order to apply caulk) must be charged as part of the ECM, not to the H&S budget category.

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

Repairs must be included in the cost of the package of measures and must be cost justified in the whole house SIR.

Testing Protocols

- Visual assessment including exterior drainage.
- Diagnostics such as moisture meters are recommended pre-weatherization and at the final inspection.
- Mold testing is not an allowable cost.

Client Education

- Provide client written notification and disclaimer on mold and moisture.
- Provide information on importance of cleaning and maintaining drainage systems.

Brief Guide to Mold, Moisture and Your Home

<https://www.epa.gov/sites/production/files/2014-08/documents/moldguide.pdf>

Training

Mold and Moisture training has been identified as a single source topic in RI's 2020 T&TA Plan

7.17 – Pests

Concurrence, Alternative, or Deferral		
Concurrence with Guidance ☒	Alternative Guidance ☐	Results in Deferral ☐

Funding				
DOE ☐	LIHEAP ☒	State ☐	Utility ☐	Other ☐

What guidance do you provide Subgrantees for dealing with pests and pest intrusion prevention in homes slated

for weatherization?

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

Define Pest Infestation Thresholds, Beyond Which Weatherization Is Deferred

\$500 limit on pest remediation with waiver approval

Testing Protocols

Assessment of presence and degree of infestation and risk to worker.

Client Education

Inform client in writing of observed condition and associated risks.

Training

No formal training on Pests is planned. If monitoring uncovers a dire need for this type of training, RI will investigate potential trainers and venues.

7.18 Radon

Concurrence, Alternative, or Deferral		
Concurrence with Guidance ☒	Alternative Guidance ☐	Results in Deferral ☐

Funding				
DOE ☒	LIHEAP ☒	State ☐	Utility ☒	Other ☐

What guidance do you provide Subgrantees around radon?

- Radon mitigation is not an allowable H&S cost.
- Clients must sign an informed consent form prior to receiving weatherization services. This form must be kept in the client file.
- In homes where radon may be present, work scope should include precautionary measures based on EPA Healthy Indoor Environment Protocols for Home Energy Upgrades, to reduce the possibility of making radon issues worse.
- Whenever site conditions permit, cover exposed dirt floors within the pressure/thermal boundary with 6 mil (or greater) polyethylene sheeting, lapped at least 12" and sealed with appropriate sealant at all seams, walls and penetrations.
- Other precautions may include, but are not limited to, sealing any observed floor and/or foundation penetrations, including open sump pits, isolating the basement from the conditioned space, and ensuring crawl space venting is installed.

Testing Protocols

RI WAP does not allow for Radon testing.

Client Education

Provide all clients EPA's A Citizen's Guide to Radon and inform them of radon related risks.

Informed consent form must include:

- Information from the results of the IAQ Study that there is a small risk of increasing radon levels when building tightness is improved;
- A list of precautionary measures WAP will install based on EPA Healthy Indoor Environment Protocols;
- Some of the benefits of Weatherization including energy savings, energy cost savings, improved home comfort, and increased safety; and
- Confirmation that EPA's A Citizen's Guide to Radon was received and radon related risks discussed with the client.

Training and Certification Requirements

- Auditors, assessors and inspectors must have knowledge of radon, what it is and how it occurs, including what factors may make radon worse, and precautionary measures that may be helpful.
- Workers must be trained in proper vapor retarder installation.
- A zonal map can be located at <http://www.epa.gov/radon/pdfs/zonemapcolor.pdf>

RI WAP has included a "Radon Awareness" training in its 2020 T&TA Plan. The training will be offered to all weatherization workers, contractors, energy auditors, QCI inspectors and state monitors.

Documentation Requirements

RI WAP Liability Disclaimer – attached as an appendix

7.19 – Safety Devices: Smoke and Carbon Monoxide Alarms, Fire Extinguishers

Concurrence, Alternative, or Deferral				
Concurrence with Guidance ☒	Alternative Guidance ☐	Results in Deferral ☐		

Funding				
DOE ☒	LIHEAP ☒	State ☐	Utility ☒	Other ☐

WPN 17-7 Requirements

- Smoke alarms may be installed where alarms are not present or are inoperable.
- CO alarms must be installed where alarms are not present or are inoperable.
- Where solid fuel burning equipment is present, fire extinguishers may be provided as an allowable H&S measure.

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

- Installation of Smoke/CO detectors is allowed where detectors are not present or are inoperable. Auditors are required to test smoke/CO detectors to ensure that they are in working condition.
- Replacing any inoperable Smoke/CO detector or any Smoke/CO detector that is over five years old is an allowable Health & Safety expense.
- Recommend fire extinguishers when a heating system uses solid fuel.
- Subgrantees must follow all manufacturers' recommendations for proper Smoke/CO detector installations. All Smoke/CO detectors must be installed to meet or exceed all local, state, and federal codes.

Testing Protocols

- Check existing alarms for operation.
- Verify operation of installed alarms.

Client Education

Provide client with verbal and written information on use of devices installed.

Training

All RI WAP/IES Auditors and Monitors are required to attend training from the Rhode Island Fire Marshall's Office on Proper Placement of Smoke and CO Detectors and this training has been included in the 2020 T&TA Plan for auditors who have not taken this training, or for auditors who would like a refresher class. Instruction includes information on Rhode Island Laws and General Regulations relating to Rhode Island Fire Safety Codes and requirements for residential buildings.

The training will be offered to all weatherization workers, contractors, energy auditors, QCI inspectors and state monitors.

7.20 Occupant Health and Safety Concerns and Conditions

Concurrence, Alternative, or Deferral		
Concurrence with Guidance ☒	Alternative Guidance ☐	Results in Deferral ☐

Funding				
DOE ☒	LIHEAP ☒	State ☐	Utility ☒	Other ☐

What guidance do you provide Subgrantees for soliciting the occupants' health and safety concerns related to components of their homes?

When a person's health may be at risk and/or WAP work activities could constitute an H&S hazard, the occupant will be required to take appropriate action based on severity of risk.

What guidance do you provide Subgrantees for determining whether occupants suffer from health conditions that may be negatively affected by the act of weatherizing their home?

Screen occupants to reveal known or suspected health concerns either as part of initial application for weatherization, during the audit, or both.

What guidance do you provide Subgrantees for dealing with potential health concerns when they are identified?

Failure or the inability to take appropriate actions must result in deferral.

Testing Protocols

Screen occupants to reveal known or suspected health concerns either as part of initial application for weatherization, during the audit, or both.

Client Education

Inform client in writing of any known risks.

Training

No formal training on Occupant Health and Safety is planned, however DHS will ensure that training on occupant health and safety is included in any comprehensive training provided to the network in 2020.

Documentation Form(s) have been developed and comply with guidance? Yes ☒ No ☐

7.21 – Ventilation and Indoor Air Quality

Concurrence, Alternative, or Deferral		
Concurrence with Guidance ☒	Alternative Guidance ☐	Results in Deferral ☐

Funding				
DOE ☒	LIHEAP ☒	State ☐	Utility ☒	Other ☐

What guidance do you provide Subgrantees regarding ASHRAE 62.2?

Install ventilation as required by ASHRAE 62.2 - 2016.

Identify the Most Recent Version of ASHRAE 62.2 Implemented

ASHRAE 62.2 2016

Testing and Final Verification Protocols

ASHRAE 62.2 evaluation to determine required ventilation.

Measure fan flow of existing fans and of installed equipment to verify performance.

Client Education

- Provide client with information on function, use, and maintenance (including location of service switch and cleaning instructions) of ventilation system and components.
- Provide client with equipment manuals for installed equipment.

- Disclaimer that ASHRAE 62.2 does not account for high polluting sources or guarantee
- indoor air quality is referenced in RI WAP Liability Disclaimer.

Training

Additional ASHRAE training was recommended by CHP for some RI WAP workers. RI is working with CHP to customize a training schedule based on energy auditor and state monitor training conducted statewide.

7.22 – Window and Door Replacement, Window Guards

Concurrence, Alternative, or Deferral		
Concurrence with Guidance ☐	Alternative Guidance ☒	Results in Deferral ☐

Funding				
DOE ☒	LIHEAP ☒	State ☐	Utility ☒	Other ☐

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

Replacement, repair, or installation is not an allowable H&S cost.

Testing Protocols

N/A

Client Education

Provide written information on lead risks wherever issues are identified.

Training

The policy is described in the Operations Manual; a statewide training on the RI WAP IES Operations Manual is planned in 2020.

7.23 Worker Safety (OSHA, etc.)

Concurrence, Alternative, or Deferral		
Concurrence with Guidance ☒	Alternative Guidance ☐	Results in Deferral ☐

Funding				
DOE ☒	LIHEAP ☒	State ☐	Utility ☒	Other ☐

How do you verify safe work practices? What is your policy for in-progress monitoring?

- Workers must follow OSHA standards where required and take precautions to ensure the H&S of themselves and other workers.
- All Subgrantees and contractors must maintain compliance with the current OSHA Hazard Communication Standard, including on-site organized Safety Data Sheets (SDS) (formerly called

MSDS).

Testing Protocols

State Monitors must verify that Subgrantees, crews and contractors follow safe work practices.

Training and Certification Requirements

OSHA 10 is required for all Energy Auditors, Quality Control Inspectors and State Technical Monitors.

Double Click To Open For Editing			
Cells this shade auto calculate			
<u>Enter</u> Measure ↓	<u>Enter</u> Cost ↓	<u>Enter</u> Frequency % ↓	Auto Calculates
Vapor Barrier	\$0.90	9.0%	\$0.08
Cover Water Pit	\$70.00	10.0%	\$7.00
Bath Vent Kit	\$135.00	40.0%	\$54.00
Dryer Vent Kit	\$135.00	38.0%	\$51.30
Smoke detectors	\$40.00	2.0%	\$0.80
CO & Smoke Combo	\$84.00	76.0%	\$63.84
ASHARE fan, no light, retrofit	\$945.00	1.0%	\$9.45
ASHRAE fan with integral LED, retrofit	\$945.00	11.0%	\$103.95
ASHRAE fan with integral LED, new install	\$995.00	47.0%	\$467.65
Kitchen Range Hood, new	\$415.00	1.0%	\$4.15
Kitchen Range Hood, retrofit	\$350.00	1.0%	\$3.50
Range Hood Vent Kit	\$150.00	8.0%	\$12.00
CO detector only	\$55.00	7.0%	\$3.85
Gable Vent	\$140.00	20.0%	\$28.00
Roof Vent	\$100.00	74.0%	\$74.00
Soffit Vent	\$35.00	93.0%	\$32.55
Proper Vent	\$4.50	32.0%	\$1.44
Total Average H&S Cost Per Unit			\$917.56
<u>Enter</u> Estimated Production (Annual File: IV.2 WAP Production Schedule) →			526
<u>Enter</u> Estimated Program Operations Budget →			4,454,812
H&S Budget (Total Average H&S Cost Per Unit * Estimated Production)			\$536,773.19
Requested H&S Percentage Per Unit (H&S Budget/Program Operations)			12.0%

RI WAP IES LIABILITY DISCLAIMER FORM



CUSTOMER NAME:	
ADDRESS:	
DATE:	

At your request, an energy audit will be conducted at your home. During the audit, audit, a certified energy auditor will evaluate your home for health and safety issues - specifically for the presence of asbestos, lead-based paint, carbon monoxide, mold/mildew, and knob and tube wiring. If the energy auditor determines that any of these substances and/or conditions are present in your home, they will bring them to your attention and specifically note them on this form. By freely and voluntarily signing this liability disclaimer form, you are specifically acknowledging that any of the substances and/or conditions listed below by the energy auditor existed prior to the energy audit and/or the weatherization work performed on your home. In addition, you agree to hold harmless and indemnify your local CAP Agency, National Grid and the State of Rhode Island for any and all damages and/or harm that may have occurred as a result of the presence of any of the substances and/or conditions that existed prior to the energy audit and which are identified below. I understand that ASHRAE 62.2 ventilation does not account for high polluting sources or guarantee indoor air quality.

Conditions Identified: Check all that apply.

- | | | |
|--|---|---|
| ☐ Asbestos | ☐ Mold/Mildew | ☐ Lead Paint |
| ☐ Carbon Monoxide | ☐ Knob and Tube Wiring | ☐ Gas Leak ☐ Other: _____ |

Weatherization achieves energy and cost savings and improved comfort, health and safety of homes through a variety of home retrofit measures, including some which improve the airtightness of the building. According to the Department of Energy (DOE) sponsored study, "Weatherization and Indoor Air Quality: Measured Impacts in Single-family Homes under the Weatherization Assistance Program," there is a small risk of increased radon levels in homes when the building air tightness levels are improved. Since your house is located in a county identified as having moderate- to high-potential-radon levels, precautionary measures indicated below will be installed as part of weatherization:

- | | |
|---|--|
| ☐ Exposed dirt floors covered and sealed | ☐ Open sump pit capped |
| ☐ Floor/foundation penetrations sealed | ☐ Crawl space venting inspected and/or improved |
| ☐ Basement isolated (air sealed) from living space | ☐ Other: _____ |

I am aware that weatherization may result in increased levels of radon, and that mechanical ventilation may counteract those increases. I have received the Environmental Protection Agency's (EPA's) "A Citizen's Guide to Radon," and radon-related risks were discussed. I have chosen to go forward with weatherization and accept all risks of injury or damages. I have carefully read this Liability Disclaimer and have signed it of my own free will.

Client Signature: _____

Date: _____

RI WAP IES DEFERRAL OF SERVICES FORM



CUSTOMER NAME:	
ADDRESS:	
DATE:	

Recently a member of our agency weatherization staff inspected your home. At that time conditions were noted that would make it difficult to weatherize your home. RI WAP/IES strives to provide weatherization services in a safe and effective manner, without undue hazards to household members, our staff, or our contractors. Please contact the agency when the noted condition(s) have been corrected.

- ☐ The client has known health conditions that prohibit the installation of insulation and other weatherization materials
- ☐ The building structure, roof or its mechanical systems, including electrical and plumbing, are in such a state of disrepair that the conditions cannot be resolved within the guidelines and at reasonable costs
- ☐ The house has sewage or other sanitary problems including pet/animal excrement that can't be corrected through weatherization and would further endanger the client and weatherization installers if weatherization work were performed
- ☐ The house has been condemned or electrical, plumbing or other equipment has been "red tagged" by local or state building officials or utility companies and corrective measures are not allowable costs
- ☐ Mold or moisture problems are present, excessive CO levels in combustion appliances or their venting, friable asbestos, or other hazardous materials, which cannot be resolved under existing health and safety guidelines or with minor repairs
- ☐ The client is uncooperative, abusive, or threatening to the auditor, subcontractors, inspectors, or others who must work on or visit the home; or the property owner or tenant refuses a weatherization measure or refuses to make modifications necessary to permit a measure to be completed
- ☐ The extent and condition of lead-based paint or any other identified hazardous condition in the house which could potentially create further health and safety hazards
- ☐ Evidence of substantial, persistent infestation of rodents, insects, or other harmful/objectionable animals that are difficult to control
- ☐ In the judgment of the energy auditor, any condition exists which may endanger the health and/or safety of the subcontractors
- ☐ The dwelling unit is for sale, or under foreclosure; scheduled for demolition or condemned
- ☐ The presence and/or use of any controlled substance in the dwelling during the weatherization process or other illegal activity
- ☐ Excessive debris build up in and around the dwelling unit which limits the program staff access to the dwelling
- ☐ Major remodeling is in progress, limiting the proper completion of weatherization measures
- ☐ Proposed conservation measures will result in minimal energy savings and the cost of installing these measures have a savings-to-investment ratio of less than one (1)
- ☐ Unvented Space Heaters in place
- ☐ Unable to conduct blower door testing, including inability to test due to the presence of vermiculite and asbestos
- ☐ Home has already been weatherized, and is not eligible for re-weatherization
- ☐ Cannot contact customer
- ☐ Unable to obtain owner permission
- ☐ Unit is vacant
- ☐ Knob and Tube

CAP Weatherization Coordinator:	
Telephone:	
Email:	

RI WAP IES AUDIT INSTRUCTIONS

This form must be completed, signed and dated by both the customer and the energy auditor, and a copy kept in the customer file.



CUSTOMER NAME:		The
ADDRESS:		
DATE:		

Weatherization Assistance Program is a **no-cost** energy conservation program for homeowners and renters who meet low-income guidelines established by the U.S. Department of Energy.

Trained staff will conduct a full energy audit/inspection of your home or apartment, which includes:

- A complete efficiency test on your heating system (including cleanings, tune-ups, and possibly replacement)
- Tests for home air leakage and insulation.
- Health and safety checks will be done for carbon monoxide, gas leaks, and smoke detectors.
- Electrical consumption survey.

Please note the following instructions:

- The audit takes approximately 3-4 hours
- Please keep animals away from contractors and staff.
- Please have all stairways, attics and basements cleared of clutter and debris.
- Do not use fireplace or wood stove within 48 hours of audit and make sure it is cleaned of all debris.
- Your home MUST be vented to auditor's suggestions if any insulation is to be installed.
- Please note that there may be some scoring marks to your exterior which may require you to do some touch up painting upon completion of the job.

Once determination has been made as to the work that is to be completed, professional licensed contractors will set up appointments with you in your home during normal business hours, Monday-Friday, 9am-5pm. You as owner/occupant or an adult 18 years or older must be home while work is being completed. Auditors will review all recommendations with the client prior to the work being done. Once the work is issued to the contractor, no changes can be made unless authorized by this agency.

Upon completion of all work, an auditor from this agency will return to your home for a post inspection and your signature, to ensure that all work is to specification and code. Federal regulations require a comprehensive post-inspection on all homes that are weatherized. **You will be responsible for all costs if access is not given for the post inspection.** Staff from the RI Department of Human Services, CLEAResult, National Grid, or the U.S. Department of Energy may also contact you for an inspection.

Cancellation Policy

Every effort is made to not cancel appointments, however, due to weather conditions, sickness and

emergencies, this situation may arise. You will receive a call by 9:30am notifying you of a change and a new appointment will be made at that time. If you need to reschedule, we ask that you notify us as soon as possible. Only one cancellation is acceptable before audit begins, otherwise, your name will go back into the waiting list rotation.

Health and Safety

In addition to making your home more energy efficient, RI WAP/IES also works to ensure your health and safety to the best of our ability. As a RIWAP/IES client, I understand that my health and safety, and that of the RI WAP/IES staff and contractors is a critical component of the program, and that any and all weatherization activities, retrofit materials, techniques or practices will be conducted to minimize any health and safety concerns and negative environmental impacts.

To provide safe and effective services, it is necessary to have an understanding of occupant health conditions and potential health concerns within the home. Please let the energy auditor know if anyone in your household has any health issues that may be affected by performing weatherization work at your home. Examples include chronic allergies or breathing problems. Please notify the energy auditor if there are any known chemicals that cannot be used in the home. Energy auditors will take all steps necessary to assure the health and safety of clients based on occupant preexisting health conditions.

Energy auditors will take all steps necessary to assure the health and safety of clients based on occupant preexisting health conditions.

Energy Auditor

Date

Client Signature

Date