

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0007912		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address Florida State of 107 E. Madison St. MSC-400 Tallahassee, FL 323990000		4. Program/Project Start Date 07/01/2021	5. Completion Date 06/30/2022

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. Federal	81.042	\$ 0.00		\$ 3,292,566.00		\$ 3,292,566.00
2. 2019 & 2020 Carryover			\$ 2,804,345.00		\$ 0.00	\$ 2,804,345.00
3.						
4.						
5. TOTAL		\$ 0.00	\$ 2,804,345.00	\$ 3,292,566.00	\$ 0.00	\$ 6,096,911.00

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	\$ 89,725.00	\$ 0.00	\$ 255,295.00	\$ 0.00	\$ 345,020.00
b. Fringe Benefits	\$ 34,096.00	\$ 0.00	\$ 97,014.00	\$ 0.00	\$ 131,110.00
c. Travel	\$ 0.00	\$ 0.00	\$ 9,444.00	\$ 0.00	\$ 9,444.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
f. Contract	\$ 0.00	\$ 384,590.00	\$ 122,769.50	\$ 484,522.50	\$ 5,350,569.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
i. Total Direct Charges	\$ 123,821.00	\$ 384,590.00	\$ 484,522.50	\$ 484,522.50	\$ 5,836,143.00
j. Indirect Costs	\$ 260,768.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 260,768.00
k. Totals	\$ 384,589.00	\$ 384,590.00	\$ 484,522.50	\$ 484,522.50	\$ 6,096,911.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0007912		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address Florida State of 107 E. Madison St. MSC-400 Tallahassee, FL 323990000		4. Program/Project Start Date 07/01/2021	5. Completion Date 06/30/2022

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		\$ 0.00	\$ 2,804,345.00	\$ 3,292,566.00	\$ 0.00	\$ 6,096,911.00

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	\$ 345,020.00
b. Fringe Benefits	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 131,110.00
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 9,444.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
f. Contract	\$ 3,700,186.00	\$ 548,500.00	\$ 44,001.00	\$ 66,000.00	\$ 5,350,569.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
i. Total Direct Charges	\$ 3,700,186.00	\$ 548,500.00	\$ 44,001.00	\$ 66,000.00	\$ 5,836,143.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 260,768.00
k. Totals	\$ 3,700,186.00	\$ 548,500.00	\$ 44,001.00	\$ 66,000.00	\$ 6,096,911.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

**U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
WEATHERIZATION ANNUAL FILE WORKSHEET**

(Grant Number: EE0007912, State: FL, Program Year: 2021)

IV.1 Subgrantees

Subgrantee (City)	Planned Funds/Units
Bay County Council on Aging, Inc. (Panama City)	\$144,771.28 9
Brevard County Board of County Commissioners (Melbourne)	\$170,857.28 13
Capital Area Community Action Agency, Inc. (Tallahassee)	\$253,933.74 24
Central Florida Community Action Agency, Inc. (Gainesville)	\$294,062.89 27
Centro-Campesino Farmworker Center, Inc. (Florida City)	\$752,384.93 80
Community Action Program Committee, Inc. (Pensacola)	\$416,933.27 41
Lake Commuity Action Agency, Inc. (Eustis)	\$134,291.28 8
Meals on Wheels, Etc., Inc. (Sanford)	\$143,992.28 9
Miami-Dade County (Miami)	\$350,516.28 33
Mid Florida Community Services, Inc. (Brooksville)	\$425,371.76 41
Monroe County Board of County Commissioners (Key West)	\$69,266.28 1
Northeast Florida Community Action Agency, Inc. (Jacksonville)	\$434,319.24 43
Osceola County Council on Aging, Inc. (Kissimmee)	\$367,657.28 35
Pinellas County Urban League, Inc. (St. Petersburg)	\$221,047.28 18
St. Johns Housing Partnership, Inc. (St. Augustine)	\$211,788.80 17
Step Up Suncoast, Inc. (Sarasota)	\$207,050.09 17
Suwannee River Economic Council, Inc. (Live Oak)	\$191,509.25 16
Tampa Hillsborough Action Plan, Inc. (Tampa)	\$438,046.29 44
Total:	\$5,227,799.50 476

IV.2 WAP Production Schedule

Planned units by quarter or category are no longer required, no information required for persons.	
Weatherization Plans	Units
Total Units (excluding reweatherized)	476
	476
Rewatherized Units	0
	0

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
WEATHERIZATION ANNUAL FILE WORKSHEET

(Grant Number: EE0007912, State: FL, Program Year: 2021)

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	476
C Total Units Reweatherized	0
D Total Dwelling Units to be Weatherized and Reweatherized (B + C)	476
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	\$3,700,186.00
G Total Dwelling Units to be Weatherized and Reweatherized (from line D)	476
H Average Program Operations Costs per Unit (F divided by G)	\$7,773.50
I Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$0.00
J Total Average Cost per Dwelling (H plus I)	\$7,773.50

IV.3 Energy Savings

Method used to calculate savings: <input checked="" type="checkbox"/> WAP algorithm <input type="checkbox"/> Other (describe below)			
	Units	Savings Calculator (MBtus)	Energy Savings
This Year Estimate	476	29.3	13947
Prior Year Estimate	320	29.3	9376
Prior Year Actual	183	29.3	5362

Method used to calculate savings description:

IV.4 DOE-Funded Leveraging Activities

DOE Funded Leveraging Activities

During Program Year (PY) 2021-2022, Florida will not utilize any DOE funding for leverage activities.

IV.5 Policy Advisory Council Members

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

Melvin Philpot	Type of organization: For-profit or Corporate (not a financial institution or utility) Contact Name: Phone: 4079429332 Email: melvin.philpot@duke-energy.com
Mr. Al Miller	Type of organization: Non-profit (not a financial institution) Contact Name: Phone: 8639563491 Email: amiller@alpi.org
Mr. Eric Poole	Type of organization: Other Contact Name: Phone: 8509224300 Email: epoole@fl-counties.com
Ms. Barbara Patten	Type of organization: Local agency Contact Name: Phone: 9418272887 Email: bpatten@manateeclaa.org
Ms. Faith Pullen	Type of organization: Non-profit (not a financial institution) Contact Name: Phone: 9549408041 Email: faith@faca.org

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
WEATHERIZATION ANNUAL FILE WORKSHEET

(Grant Number: EE0007912, State: FL, Program Year: 2021)

Ms. Ginnifer Barber	Type of organization: Unit of State Government Contact Name: Phone: 8504142031 Email: Barberg@elderaffairs.org
Terry Mutch	Type of organization: Local agency Contact Name: Phone: 8502222043 Email: terry.mutch@cacaainc.org

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
04/06/2021 Notice ran on the Florida Administrative Register (FAR)
04/07/2021 Notice appeared on FL Department of Economic Opportunity Website
04/23/2021 Held Public Hearing

IV.7 Miscellaneous

The following personnel are the official Florida points of contact that will be identified in the Assistance Agreement, which is the authorizing award document issued by the DOE contracting officer:

Recipient Business Officer

The representative is authorized to act on the behalf of the Grantee to negotiate the award. All DOE official correspondence related to the award will be addressed to the Recipient Business Officer.

Debbie Smiley, Bureau Chief

Bureau of Economic Self-Sufficiency, Division of Community Development
Florida Department of Economic Opportunity
107 East Madison Street, MSC 400
Tallahassee, Florida 32399
Phone (850) 717-8467

Principal Investigator

The technical representative is authorized to act on behalf of the Grantee as project manager for the award. The Grantee's Principal Investigator is the prime point of contact for the DOE Project Officer during the project period of performance and will receive a copy of all DOE official correspondence related to the award.

Caleb Crow, Community Program Manager

Florida Weatherization Assistance Program
Bureau of Economic Self-Sufficiency,

Division of Community Development
Florida Department of Economic Opportunity
107 East Madison Street, MSC-400
Tallahassee, FL 32399-6508
Phone (850) 717-8456

Policy Advisory Council:

Please see Policy Advisory Council members profiles attached to SF-424.

2019 ACSI Action Plan Results:

Summary:

The 2019 American Customer Satisfaction Index (ACSI) informs DEO's approach to improving the Florida Weatherization Assistance Program. The 2019

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
WEATHERIZATION ANNUAL FILE WORKSHEET

(Grant Number: EE0007912, State: FL, Program Year: 2021)

Florida Customer Satisfaction Index was a 41, compared to the DOE WAP National Customer Satisfaction Index of 73. Florida scores drivers of satisfaction ranged from 36 to 71, with the development of the WAP State Plan, distribution of funds, and Partnerships scoring the lowest and Monitoring and Corrective Action scoring the highest.

Communication was the driver with the highest impact and carried the most influence on satisfaction at the time. With a score of 39, Florida Communication was low and was recommended as a primary focus for improvement. Recommended focus was on improving the “usefulness” of feedback about work plans and performance monitoring” and the “clarity of communications”. DEO is committed to increasing its communication and engaging with the Florida WAP Network.

Communication:

Under new management, communication remains a priority. Focus on transparency and timely communications has been established through monthly network teleconferences, FACA network meetings, and mandatory contract manager communication standards. These will continue and expand, starting with a network survey on communication style and expectations, moving into PY21.

Training and Technical Assistance:

DEO organized a BPI Energy Auditor certification training conducted by Everblue in February 2021, however, with many travel bans still in place, the field test has been particularly challenging. As Florida returns to work and travel restrictions decline, more training will be offered now that the statewide contract through FACA is in place.

DEO has made additional budgetary considerations in the 2021 WAP State Plan to procure a second trainer at the state to meet all IREC accreditations moving forward. Until that time, Everblue will continue to host Energy Audit and Quality Control Inspector training through FACA.

Timely Reimbursements:

DEO and Florida Weatherization Network discussed reimbursement concerns and found that the ASCI survey did not reflect the WAP subrecipients experience as it relates to timely reimbursements. All subrecipients have appreciated timely reimbursements since the implementation of Subrecipient Enterprise Resource Application (SERA).

Health and Safety Cost:

In Florida's hot and humid climate, ventilation is typically only cost effective through using Energy Recovery Ventilation (ERV). DEO and the Florida WAP network are working to minimize the cost of ERVs when called for by RedCalc and provide continued training to the network on ASHRAE 62.2 2016.

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

(Grant Number: EE0007912, State: FL, Program Year: 2021)

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 10 CFR 440.22, "Eligible Dwelling units." Eligibility may be categorical or traditional.

Categorical Eligibility:

Categorical eligibility applies when one or more persons living in the dwelling unit 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 months preceding the determination of eligibility for weatherization assistance; or one or more persons in the unit 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.

Traditional Eligibility:

Traditional eligibility applies to any household 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 for the 12 months preceding the application.

All income documentation/information must be recertified after 180 days of the original income verification date. If it is determined that a Subrecipient weatherizes a dwelling of a household that does not meet the income eligibility guidelines in WAP, that Subrecipient will be required to reimburse WAP the total cost of the weatherization activity and generated Program Support (PS).

Describe what household eligibility basis will be used in the Program

A household shall be defined as a family unit meeting the qualifications listed above to qualify for weatherization. In Florida, any household meeting either categorical or traditional eligibility would be eligible to receive weatherization benefits by the WAP.

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

Florida will follow the guidance provided by the U.S. Department of Health and Human Services (HHS) under the Low-Income Home Energy Assistance Program (LIHEAP) available at:

<https://www.acf.hhs.gov/ocs/resource/liheap-in-hhs-guidance-on-the-use-of-social-security-numbers-ssns-and-citizenship-status-verification>

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

Single-Family dwellings with clear proof of ownership are eligible units for weatherization. The Subrecipient is required to collect proof of ownership documentation from applicants and maintain this proof in the client file.

No dwelling unit may be weatherized without documentation that the dwelling unit is an eligible unit. During the initial client application process, the application must provide evidence or income documentation satisfactory to the Subrecipient outreach worker that the household meets the eligibility requirements. The documentation must be maintained in the client file and made available for inspection by the Subrecipient and state staff. In accordance with the U.S. Department of Energy (DOE) Weatherization Program Notice 21-3, DEO will follow the calculation method as outlined in Florida Procedure & Guidance manual. The method of calculation shall be determined by the Grantee and will be applied uniformly by all subrecipients.

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

(Grant Number: EE0007912, State: FL, Program Year: 2021)

Describe Reweatherization compliance

Section 1011(h) of the Energy Act of 2020 and 42 U.S. Code § 6865(c)(2), as amended, removed the reweatherization date, September 30, 1994, and created a “rolling” option. Reweatherization is defined as “*Dwelling units weatherized (including dwelling units partially weatherized) under this part or under other Federal programs (in this paragraph referred to as ‘previous weatherization’), may not receive further financial assistance for weatherization until the date that is 15 years after the date such previous weatherization was completed.*” The priority is to serve dwelling units that have not received prior services. All dwelling units eligible for reweatherization, must have an audit performed using DOE-approved energy audit tool, National Energy Audit Tool (NEAT) or the Mobile Home Energy Audit Tool (MHEA), to justify the cost of the measures being installed. Eligible dwelling units may not receive weatherization services again unless such dwelling unit has been damaged by fire, flood or act of God and repair of the damage to weatherization materials is not paid for by insurance or other federal funds such as the Federal Emergency Management Agency (FEMA).

Describe what structures are eligible for weatherization

Structures eligible for weatherization include single family, manufactured housing and multi-family housing. All structures must be stationary and have a specific mailing (street) address. Campers and non-stationary trailers are not eligible.

Additionally, every dwelling weatherized must meet both the client eligibility and the building eligibility requirements. Structures are ineligible for weatherization funds if they are condemned, scheduled for demolition or designated for acquisition or clearance by a federal, state or local program within 12 months from the date of weatherization scheduled completion.

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

Subrecipients will exercise caution in dealing with non-traditional type dwelling units to ensure that they meet program regulations on whether the unit is, in fact, eligible.

Describe how Rental Units/Multifamily Buildings will be addressed

Rental Units:

Weatherization of rental units is an allowable activity. There are specific guidelines that are addressed in the Florida WAP Manual, Procedures and Guidelines section, and WPN 16-6 Weatherization of Rental Units. These include:

1. After the client application has been received and it is determined that the household meets the eligibility requirements, the owner must provide proof of ownership (a copy of the deed or property tax receipt).
2. The property owner must sign the Building Owner Agreement (BOA) and Permission to Enter Premises (PEP) form. The Landlord Agreement Form (LAF) stipulates that:
 - o The benefits of the services accrue primarily to the tenants.
 - o For a period of 12 months, the tenant will not be subject to a rent increase (unless demonstrated that they are related to other matters not related to the weatherization work performed).
 - o A tenant rent increase complaint may be appealed by the owner.
 - o No undue enhancements shall occur to the value of the dwelling unit.
 - o Encourage financial participation by the owner if feasible.
3. In cases of rental units in multi-family buildings, a 66 percent or 50 percent rule for determining income eligibility requirements must be followed per 10 CFR 440.22(b)(2).

Multi-Family Units:

Multi-family units, 5 units and above, require case-by-case approval from DOE.

Florida requirements for determining eligibility of multi-family dwellings following DOE guidance:

1. WPN 16-5, Multifamily Weatherization
2. WPN 17-4, Procedures for Certifying Income-Eligible HUD Assisted Buildings;

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

(Grant Number: EE0007912, State: FL, Program Year: 2021)

Projects being considered for weatherization must be confirmed to meet the 66 percent rule for determining eligible dwellings, or in special cases the 50 percent rule. The buildings that are subject to the 50 percent threshold are duplexes, four-unit buildings, and certain eligible types of large multifamily buildings. In the final rule published on December 8, 2000, DOE provided guidance on what types of large multifamily buildings may be subject to the 50 percent threshold. (65 Fed. Reg. 77210, Dec. 8, 2000.)

The same assessment of property/unit requirements utilized for single family rental units (PEP and BOA/LAF) will apply to any multi-family projects that a Subrecipient may consider weatherizing. Subrecipients considering undertaking a multi-family project within their service area must contact the state WAP office for any additional guidance and then submit the application documentation for review. Then the package will be forwarded to DOE for review and approval. A multi-family project cannot proceed until approved by DOE and then by the state WAP office.

Describe the deferral Process

Deferral Process:

The Florida Weatherization Assistance Program (WAP) may elect to defer a dwelling from receiving weatherization services where health and safety hazards exist for WAP staff, contractors, clients or where conditions prevent the safe and effective implementation of weatherization measures. The decision to defer work in a dwelling, or in extreme cases, provide no weatherization services, 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 problem can be resolved. Information for making this determination may become evident during the eligibility process, that the audit or after work has started.

Conditions that may cause a dwelling to be deferred may include, but are not limited to the following:

- The dwelling was weatherized in the past 15 years.
- A dwelling unit is vacant.
- A dwelling unit is for sale.
- A dwelling unit is scheduled for demolition.
- When there are minor children in the dwelling, but no adult client or adult agent of the client at the time of the estimate or at any other time Subrecipient personnel must enter the dwelling.
- The eligible member of the household moves from the dwelling unit where weatherization activities and services are in progress. In such a case, the Subrecipient must determine whether to complete the work and the circumstances must be documented in the client file.
- The client has known health conditions that prohibit the installation of insulation and other weatherization materials. When a person's health may be at risk and/or the work activities could constitute a health or safety hazard, the occupant at risk will be required to take appropriate action based on severity of risk. Temporary relocation of at-risk occupants may be allowed on a case-by-case basis. Failure or the inability to take appropriate actions must result in deferral.
- A dwelling unit is deemed by the auditor to have irreparable conditions that pose a threat to the health or safety of the crew or subcontractor.
- A mobile home is improperly installed (for example, inadequate supports).
- A dwelling unit is uninhabitable (for example, a burned-out apartment).
- There are health or safety hazards that must be corrected before weatherization services may begin that include, but are not limited to:
 - The presence of animal feces and/or other excrement;
 - Disconnected waste water pipes;
 - Hazardous electrical wiring; or
 - Unvented combustion appliances.
- The building structure or its mechanical systems, including electrical and plumbing, are in such a state of disrepair that failure is imminent and the conditions cannot be resolved cost-effectively.
- The house has sewage or other sanitary problems that would further endanger the client and weatherization installers if weatherization work were performed. Deferral may be necessary in cases where a known agent (odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.) is present in the home that may create a serious risk to occupants or weatherization workers.
- The property has been condemned or electrical, heating, plumbing or other equipment has been "red tagged" by local or state building officials or utilities.
- Moisture problems, mold and/or mildew are so severe they cannot be resolved under existing health and safety measures and with minor repairs.
- The home has drainage related conditions (gutters, downspouts, extensions, flashing, sump pumps, landscape, etc.) that may create a serious health concern and require more than incidental repair.
- Dangerous conditions exist due to high carbon monoxide levels in combustion appliances and cannot be resolved under existing health and safety measures.
- Dangerous conditions exist due to major gas leak(s) and cannot be resolved under existing health and safety measures.
- If pollutants pose a risk to workers and removal cannot be performed or is not allowed by the client. Pollutants include formaldehyde, Volatile Organic Compounds (VOCs) and other air pollutants.

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

(Grant Number: EE0007912, State: FL, Program Year: 2021)

- When the extent and condition of lead-based paint in the house would potentially create further health and safety hazards.
- Infestation of pests, including rodents, vermin, fleas, roaches, may be cause for deferral where it cannot be reasonably removed or poses health and safety concern for workers.
- If there is a dangerous dog or other animal that poses a threat to weatherization workers.
- Improperly stored chemicals, combustible materials or other fire hazards that present a danger to the occupants or workers.
- The home is cluttered to the extent that mobility and the ability to perform weatherization work is hindered and obstacles create a safety hazard.
- If the home is being remodeled or rehabilitated and the weatherization work is not coordinated with that effort.
- Obvious discrepancies are found between the information supplied by the client on the application and observed conditions at the time of weatherization. The Subrecipient must resolve these discrepancies before weatherization work can continue.
- The client is uncooperative with the Subrecipient, either in demanding that certain work be done and refusing higher priority work that is needed, by being abusive to the work crew or subcontractor or by being unreasonable in allowing access to the unit. Every attempt should be made to explain the program and the benefits of the work. If this fails, work should be suspended and the DEO should be consulted.
- If, at any time prior to the beginning of work (materials installed in a unit), the Subrecipient determines that the client is no longer eligible or Subrecipient personnel believe that circumstances may have changed, the unit shall not be weatherized until updated information can be obtained from the client.
- The presence of live knob-and-tube wiring in areas where weatherization work must be performed.
- The illegal presence or use of any controlled substance in the home during the weatherization process.

Deferral Procedures:

Deferrals During Audit:

If an auditor arrives at a home, begins to review the dwelling and determines it should be deferred prior to concluding the audit, the auditor shall immediately contact the Subrecipient Weatherization Director to describe the situation and ask for guidance. If in the auditor's judgment during the audit, he/she feels the dwelling should be deferred for a problem likely and/or easily fixed and that the dwelling will eventually be weatherized, the audit may continue; however, the auditor shall immediately contact the Subrecipient Weatherization Director to describe the situation and ask for guidance. If possible, the Weatherization Director (or his/her assignee) may want to meet the auditor in the field to discuss the situation further and brainstorm ideas to allow the audit to continue and avoid deferral. No dwelling may be deferred without approval from the Subrecipient Weatherization Director. If possible, all areas of the home should be inspected to identify all deferral issues to avoid multiple deferrals. Photos of all deferral conditions should be taken and included in the client file.

If the dwelling must be deferred, the auditor shall provide the homeowner with a brief statement (when feasible) of why they are recommending a deferral. The auditor will then report the recommended deferral to the Subrecipient Weatherization Director, who will assess the documentation (photos, description of the situation), approve or disapprove the deferral and notify the homeowner in writing of the deferral decision.

If a deferral occurs before the audit is completed, the unit still may be eligible for payment. If the cause of the deferral is resolved, the Subrecipient shall assign the same auditor to the unit to conclude the audit. If a dwelling is deferred after the audit is completed, payment may not be made unless and until the "Administrative Procedures to be Followed for Deferred Units" below is concluded.

Deferral at Time of Measure Installation:

Any crew or contractor who arrives on site and discovers what they believe to be a cause for deferral shall immediately contact the Weatherization Director to discuss the situation and determine a course of action. No work shall be done on the dwelling.

If the unit is to be deferred, the contractor shall provide the homeowner with a brief statement (when feasible) of why they are recommending deferral before departing. The contractor will then report the recommended deferral to the Subrecipient Weatherization Director, who will assess the documentation (photos, description of situation) approve or disapprove the deferral, and notify the homeowner in writing of the deferral decision. The contractor shall then be entitled to payment for work completed prior to the deferral.

Administrative Procedures to be followed for Deferred Units:

Once a unit has been deferred, the Subrecipient shall make every effort to bring homeowners back into the program. The Subrecipient shall:

1. Direct a letter to the homeowner informing them the dwelling has been deferred and asking them to correct the deferral conditions and contact the Agency when work is complete. The agency should give the client 60 days, or a reasonable amount of time, to correct the issue(s). The letter should refer the client to any resources that may assist with the deferral conditions, as well as information on their right to appeal.
2. If no action is taken by the homeowner, a second letter will be sent to the client by certified mail, informing them that they must contact the Subrecipient within 30 days to be eligible for weatherization services.
3. If no response is received to the certified letter, the unit is removed from further consideration by WAP at the current time.
4. If at any time the homeowner states that they cannot or will not make the needed repairs, a final letter shall be sent to the homeowner informing them that they have been removed from the program and that they may not participate in WAP unless and until the identified conditions have been remedied and an

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

(Grant Number: EE0007912, State: FL, Program Year: 2021)

updated application is submitted.

All letters and documentation of efforts to contact or help the homeowner shall be kept in the clients file by the Subrecipient.

It is the homeowner's responsibility to correct the above conditions(s) to proceed with weatherization services. When the conditions causing the deferral have been addressed, homeowners are asked to contact the weatherization Subrecipient to reevaluate the dwelling. When possible, weatherization Subrecipients are encouraged to make referrals or collaborate with other programs and other local resources to best serve the customer.

Notification and Appeal:

Households shall be informed in writing by the Subrecipient when services are deferred based on the deferral guidelines above. The deferral notice will include instructions to remedy the conditions that led to the deferral or to appeal the deferral based on the 'Complaints and Dispute Resolution' policy.

In unusual situations not covered above or where other problems of a unique nature exist, DEO should be consulted.

If obvious discrepancies are found between the information supplied by the client on the application and observed conditions at the time of weatherization, the Subrecipient must resolve these questions prior to weatherization. Some examples of discrepancies are an obvious change in the client's income (e.g., an unemployed client who is now back to work), a difference in the number of persons living in the dwelling unit (fewer persons than listed, a person or persons not accounted for who may have income) or evidence of an unreported business being conducted in the unit, etc.

V.1.3 Definition of Children

Definition of children (below age): **12**

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.

Low-income members of an Indian tribe whose household meets the eligibility requirements are eligible to receive benefits equivalent to the assistance provided to other low-income persons within the state.

Assistance is made available to all low-income residents of the state without regard to tribal organization status, to the extent that funding is available.

V.2 Selection of Areas to Be Served

Services will be available in each of Florida's 67 counties. The weatherization funds are allocated to the local Subrecipient based on an allocation formula comprised of the low-income population of the state against the low-income population of each county, the average number of heating and cooling days in each of the two climate zones and the overall average energy cost per kilowatt.

Allocation of funds to Subrecipients and across budget categories will be based on the base formula and will not require additional public hearings.

The WAP Subrecipient Procedures Manual describes the state's response to Subrecipient noncompliance, including recoupment or reduction of funding, Subrecipient probation and Subrecipient termination.

Redistributing provision: DEO retains the right to allow for reallocation of funds to Subrecipients and across budget categories using the same formula as originally proposed or any other funding plan that meets the needs of targeted Florida citizens. This can be done without holding additional public hearings. Active management and reallocation of the grant allows the grant to be fully expended during the budget period.

V.3 Priorities

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

(Grant Number: EE0007912, State: FL, Program Year: 2021)

Once eligibility has been determined, the subrecipient must abide by the following client priority policy.

Applications should be assessed with a number of priorities based on information taken from the application. In accordance with 10 CFR 440.16, priority must be given in identifying and providing weatherization assistance to households where one or more of the following exist:

1. High energy usage.
2. High energy burden.
3. Elderly household member(s) who are 60 years or over;
4. Disabled household member(s);
5. Household member(s) under the age of 12.

Households that do not meet at least one of the priority categories may only be served if all eligible priority households in the Subrecipient's territory have been served. Within the above listed priority, subrecipients may choose the order in which households are served. The number of preference points determines client position on the waiting list. The person with the most points will be placed at the top of the waiting list. Lower priority ranked, income-eligible households will be served later in the program year or when funding is available. Priority systems must be applied equally to both renter and owner-occupied dwellings and applied equitably to all areas of the subrecipient's territory.

Subrecipients may choose to consider using the oldest application approval date for positioning applicants with priority points. An application with at least one priority point may be moved up on the list when working in the same area to save travel time.

Subrecipients that choose to develop their own methods for prioritizing clients must still adhere to federal regulation 10 CFR 440.16(b), develop written procedures, and seek approval of the methodology from DEO. Each subrecipient must develop a client facing priority policy so that clients are able to understand the selection process. This policy will be reviewed during monitoring.

V.4 Climatic Conditions

Florida has two distinct climate zones. Based upon the provided climate zone map, almost the entire state falls under one climate zone. The applicable energy audits are set to reflect the appropriate climate zone for determining applicable weatherization activity recommendations.

Each year a climate and demographics formula is updated to determine the percentage of allocation needed for each county in Florida. Counties with higher degree days and more eligible households receive increased funding. As climate and population changes occur over time, allocations are intentionally lagged to reduce the shock in the changing budget year-to-year. A hold harmless formula is used to prevent large changes year-to-year for subgrantees. Subgrantees receive 80% of the previous year, historically derived, percentage and 20% of the climate and population derived percentage to determine their total allocation.

V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials

During Program Year (PY) 2021, all Florida technical guides and materials will meet the specifications, objectives and desired outcomes outlined in the Standard Work Specifications for Home Energy Upgrades (SWS).

The following guides will be utilized by all Subrecipients and as applicable, contractors in performing weatherization activities:

- a) Florida WAP Procedures and Guidelines (P&G),
- b) SWS/Florida Field Guides (SWS/FFG),
 - i. Single Family Homes: <http://floridajobs.org/reports/2018SingleFamilySWS.pdf>
 - ii. Manufactured Homes: <http://floridajobs.org/reports/2018ManufacturedHousingSWS.pdf>
- c) NEAT and MHEA,

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

(Grant Number: EE0007912, State: FL, Program Year: 2021)

- d) Florida Weatherization Health and Safety Plan,
- e) Florida Weatherization Program Notices,
- f) Quality Control Inspection (QCI) report,
- g) Monthly reporting forms,
- h) Contractors agreement language, and
- i) DOE-Approved State Plan Application for 2021-22.
- j) Subrecipient WAP contractual agreement attachments - *(Scope of Work, Reporting, Record Keeping and Special Conditions, as applicable).*

Communication of guidelines and standards:

During program year 2021, all Subrecipient contracts and Subrecipient vendor contracts will contain language that specifically includes adherence to the Field Guide and SWS requirement, Procedures Manual, Health and Safety Plan and Program Notices. "... Work performed on dwellings shall be completed in accordance with the Standard Work Specifications (SWS)/Florida Field Guide (FFG), the Florida Weatherization Procedures Manual, Weatherization Priority List, Supporting Weatherization Program Notices, along with any supplemental DEO and USDOE guidelines..." As stated in Paragraph G of the Scope of Work of the WAP agreement, "Subrecipient shall ensure that all installed weatherization materials meet the materials standards taken from Appendix A of 10 C.F.R. part 440, be of good quality, and be installed in a safe, cost effective manner."

All work being performed by Florida WAP will be in accordance with the DOE-approved energy audit procedures and 10 CFR 440 Appendix A. In addition to materials approved in 10 CFR Appendix A, DEO has been approved to utilize Light Emitting Diodes (LED) as an energy conservation measure in Florida.

1. The Florida WAP Procedures and Guidelines will include sections for quality work standards, inspection compliance and Quality Control Inspector qualifications, training requirements and certification. By signing the DEO agreement, Subrecipients are acknowledging receipt of all technical manuals, policies and protocols.
2. The state will require written Subrecipient communication and verification to ensure that the requirements are understood. The state will require the Subrecipient to provide written communication verification from all vendors of the SWS.

The Standard Work Specifications (SWS) will be updated in PY21 and rebranded as Florida Field Guides. The process will build upon the existing SWS with the same vendor, Santa Fe Community College. The revision process will include procurement process starting in July 2021, DEO review in November 2021 and final acceptance in December 2021.

The Florida Field Guides will be distributed through Statewide Weatherization Program Notice, made available on the DEO website, and through a network presentation on the changes from SWS 2015/2018 to Florida Field Guide 2021.

Field guide types approval dates

Single-Family: 12/19/2018
Manufactured Housing: 12/19/2018
Multi-Family:

V.5.2 Energy Audit Procedures

Audit Procedures and Dates Most Recently Approved by DOE

Audit Procedure: Single-Family

Audit Name: Other (specify)

Florida Weatherization Assistance Program, Single Family Site-Built Housing based on NEAT, submitted for Energy Audit Procedure Approval, March 20, 2020; Provisional Approval September 22, 2020.
--

Approval Date:

Audit Procedure: Manufactured Housing

Audit Name: Other (specify)

Florida Weatherization Assistance Program, Manufactured Housing based on MHEA, submitted for Energy Audit Procedure Approval,

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

(Grant Number: EE0007912, State: FL, Program Year: 2021)

March 20, 2020; Provisional Approval September 22, 2020.

Approval Date:

Audit Procedure: Multi-Family

Audit Name: Other (specify)

Multi-family units will represent less than 20 percent of all units weatherized during any program year. DEO and all its subrecipients will submit multi-family projects to DOE for approval on a case-by-case basis.

Approval Date:

Comments

Florida is committed to resubmitting energy audit procedures to DOE for approval every five (5) years, with the understanding that sufficient lead time is required for the approval process. The current NEAT and MHEA procedures were last approved by DOE on September 22, 2020 and will expire on September 22, 2025.

Florida Subrecipients will conduct a full site-specific energy audit utilizing the Weatherization Assistant software. Subrecipient's will complete an assessment of the central heating and cooling unit, water heater and building's characteristics.

When the online version of Weatherization Assistant becomes available during the program year, subgrantees will undergo a 60-day transition process.

For multi-family units, DEO will ensure that all WAP staff will have the required training and any proposed weatherization of multi-family units will be approved by DOE before work commences.

Multi-Family Audit:

Florida historically has fallen below the DOE 20 percent threshold of weatherizing multi-family dwelling units and does not currently have a DOE-approved audit and procedures for multifamily buildings. However, in the event a Subrecipient decides to undertake a multi-family building project for weatherizing, it will:

- a. Follow the multi-family dwellings criteria outlined in Section V.1.2 Approach to Determining Building Eligibility.
- b. Conduct the building assessment (diagnostic testing and inspection) and have a qualified energy auditor complete a DOE-approved energy audit (see WPN 19-4 for DOE-approved multifamily energy audits) to determine the energy conservation measures that should be implemented through weatherization.
- c. Submit to the state WAP office all documentation and material from the assessment and audit, including the recommended scope of work and installation procedures.

After the state WAP office assessment is completed, it will forward that proposal to its DOE Project Officer for review and approval. Multi-family projects will be assessed on a case-by-case basis.

V.5.3 Final Inspection

DOE requires that Quality Control Inspectors working for WAP possess the knowledge, skills and abilities in the National Renewable Energy Laboratory (NREL) Job Task Analysis for Quality Control Inspectors. This requirement applies to all individuals, including final inspectors, who perform an evaluation and approve work performed in homes.

The Quality Control Inspection will ensure that the weatherization services were completed properly and that all measures called for in the assessment, work orders and change orders have been installed and completed in a quality workmanship like manner, and are in accordance with the priorities determined by the audit procedures, standard work specifications and all other Florida DEO Weatherization Assistance Program requirements.

Florida Subrecipients may apply one of the two options available for meeting the Quality Control Inspection (QCI) requirement:

- a. Independent QCI (Subrecipient staff or outsourcing)
- b. Independent Auditor /QCI

No dwelling unit will be considered as completed and reported to DEO until:

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

(Grant Number: EE0007912, State: FL, Program Year: 2021)

- The QCI is performed (either by a Subrecipient staff who is certified to perform the QCI or through an outsourced entity approved to conduct the QCI by DEO).
- The QCI individual completes the QCI Report and both the QCI individual and whomever performed the initial inspection and diagnostic testing on the dwelling signs this report.
- When the dwelling unit is ready for submittal to DEO, a copy of the QCI Report will also be submitted.
- An approved deferral was used on the home due to client noncompliance.

DEO has developed a WAP production spreadsheet that is submitted by subrecipients with each monthly request for reimbursement (see attachment 9. *Monthly Production Report_Sample*). This spreadsheet captures the name of the QCI, status of QCI certification, date the QCI certification expires and whether the QCI is a contractor. This report is reviewed by the contract manager monthly and maintained in the subrecipient's file.

Quality Control Inspectors are individuals who are not involved in the prior work inspected as the energy auditor/assessor, a member of the crew or affiliated with a contractor hired to install any weatherization item. If a Quality Control Inspector is found to have any conflict of interest, DEO may at its own discretion require the Subrecipient to hire a third party QCI to redo the inspection on a home or homes at the Subrecipient's cost.

QCI Completed Inspection Form

Each Subrecipient weatherized dwelling will be inspected by a QCI. The QCI/DIR form will:

- a. Indicate the relationship of the QCI to the Subrecipient (I/QCI or IA/QCI);
- b. Document the inspection items and be signed and dated by the QCI;
- c. Be placed in the client file; and
- d. A copy must be included with the monthly Financial Activity (FA) when the dwelling is submitted to DEO.

State Monitoring:

- a. Subrecipients implementing the I/QCI approach will require DEO to perform a QCI on a minimum of five (5) percent of the projected dwellings to be completed with DOE WAP funding.
- b. Subrecipients implementing the IA/QCI will require DEO to perform a QCI on a minimum of 10 percent of the projected dwellings to be completed with DOE WAP funding.

Non-Compliance Situations:

During a state monitoring visit, if it is determined that the certified QCI individual demonstrated inadequate inspection practices, DEO may implement the following steps:

- a. Bring the issue to the attention of the Subrecipient inspector and/or certified QCI individual during the visit;
- b. Discuss the issue to determine why the error occurred;
- c. Document the issue by photograph;
- d. Determine what corrective actions are required;
- e. Have the Subrecipient coordinate with the contractor/crew to perform the corrective actions required (if a workmanship issue) to achieve compliance and provide photo documentation of the corrected activity to DEO within a prescribed time frame;
- f. Determine if additional training is required for the QCI individual (if only a minor or one-instance situation);
- g. Consider having another independent QCI individual perform a spot check of dwellings and files to be reported on the following months FA prior to that report being submitted;
- h. Request a copy of all documentation (PLAT, DAT, audit, priority list, etc.) for a dwelling to be reported in the following month along with photos of all measures installed; and
- a. Coordinate a follow-up spot check Quality Assurance (QA) visit focusing on the past issue, the QCI documentation and conduct a dwelling inspection.

Repeat Non-Compliance Situation

Each QCI non-compliance situation will be handled on a case-by-case basis. If the Certified QCI individual is found to be in non-compliance (repeat infractions) in performing the QCI, a written notification from DEO will be provided to the Subrecipient directing it to seek alternate means for having the QCI performed on future dwellings.

The QCI individual will also be notified in writing of their suspension from performing future QCIs for Florida Subrecipients. If that individual participates in refresher QCI training, they may be given an opportunity to demonstrate competency during a supervised, probationary period. Each suspension situation will be handled on a case-by-case basis.

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

(Grant Number: EE0007912, State: FL, Program Year: 2021)

V.6 Weatherization Analysis of Effectiveness

Subrecipient effectiveness is assessed through multiple measures. On-site monitoring requirements described in V.8.3 Monitoring Activities provide ideal conditions during which Subrecipients may be evaluated and areas in need of improvement can be identified.

In addition to the formal monitoring reporting that tracks deficiencies and findings and outlines how to make improvements, monitoring visits allow for a comprehensive review of the agency. Such reviews may include technical and financial systems and procedures, follow up on previous training outcomes and identification of future training needs and the sharing of "best practices" at all levels of operation.

Additionally, the following approaches are used to determine the Subrecipient implementation level and competency in meeting the goals of WAP:

- Reviewing monthly reports submitted by Subrecipients, reviewing the pre-and-post weatherization utility bills of households served and performing monitoring visits and dwelling inspections either supports Subrecipient effectiveness or brings up ineffective areas that need to be addressed.
- Comparing productivity or energy savings of all Subrecipients can indicate if additional training is required and supports initiating peer to peer or state coordinated training and technical assistance (T&TA) activities.
- Analysis of Subrecipient monitoring report responses can also indicate if additional assistance or training is needed.
- Following up with Subrecipients' corrective actions to ensure improvement on issues discovered during monitoring visits.
- Reviewing of training credentials or attendance records to ensure that the Subrecipient is meeting the DOE required Quality Work Plan to implement the QCI and the Job Task Analysis (JTA) training/certification requirements.
- Comparing the annual risk analysis assessment of each Subrecipient's past performance to summarize the financial reviews, monitoring report(s) and any outstanding issues. From this assessment, each Subrecipient's needs, strengths and weaknesses may be determined and plans made to follow-up on providing the necessary T&TA to ensure future compliance.
- Subrecipients determined to be at risk may be placed on probationary status for a period of time. Failure to achieve compliance during that time period may result in termination of their agreement.

Plans of Action include training efforts with contractors and assessors, job site monitoring of contractors during blower door directed air sealing efforts and field workshops sponsored or conducted by DEO.

DEO will strengthen the monitoring process by requiring a Subrecipient response to monitoring reports with findings, or numerous or repetitive observations, that requires not only documentation of correction of work deficiencies, but also the actions taken or planned that will ensure that similar deficiencies will not be repeated in future weatherization work.

V.7 Health and Safety

In accordance with the Final Rule and Weatherization Program Notice (WPN) 17-7, DEO will adopt the following approach to implementing health and safety measures:

Subrecipients shall comply with all applicable federal, state and local building codes and regulations.

DEO provides Subrecipients with an allocation of funds identified as a budget line item to be used for required health and safety measures. Specific health and safety related measures are reported in the designated electronic data reporting system. The purchase and maintenance of personal protective equipment and other safety equipment is allowed. Each Subrecipient has a Training and Technical Assistance budget and those funds may be used to provide training and certification to address health and safety issues.

Florida will budget health and safety funds at less than 15 percent of the Program Operations funds budgeted. Florida tracks health and safety labor and materials costs on its work order. Reporting data that populates the statewide database makes it possible to track and manage all health and safety costs.

DEO encourages Subrecipients to maintain coverage for Pollution Occurrence Insurance (POI), but no longer makes it mandatory.

Subrecipients must comply with Occupational Safety and Health Administration (OSHA) and Safety Data Sheets (SDS) requirements in all weatherization activities under the revised Hazard Communication Standard (HCS) 29 CFR 1910, 1200, and take precautions to ensure the health and safety of themselves and others. Wherever workers or residents may be exposed to hazardous materials subrecipients, contractors, and subcontractors will develop and maintain a

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

(Grant Number: EE0007912, State: FL, Program Year: 2021)

written hazard communication program conforming to the HCS 29 CFR 1910, 1200. The subrecipient shall ensure that:

- All hazardous chemicals in the workplace are listed,
- All containers of hazardous chemicals are labeled,
- Safety data sheets are maintained for all hazardous chemicals, and
- Workers are informed and trained in program elements, hazards, and protective measures.
- SDS must be posted wherever workers may be exposed to hazardous materials.

Subrecipients will be assessed and monitored to determine whether workers are utilizing safe work practices and following all OSHA standards.

Any deficiencies found shall be documented, and appropriate action will be taken to address the issue including additional training, notification of "at-risk" status, or issuance of "stop work" order, until such time as it is determined that Subrecipient understands all OSHA requirements and will adhere to them

V.8 Program Management

V.8.1 Overview and Organization

The Florida WAP is administered under the Florida Department of Economic Opportunity (DEO). It is located in the Division of Community Development, Bureau of Economic Self-Sufficiency (BESS). WAP direct personnel roster consists of a Bureau Chief, Program Manager, Government Operations Consultant I, ten Government Operations Consultants II (monitors) and two Government Operations Consultants III. In addition to WAP, the Community Services Block Grant (CSBG) and the Low-Income Home Energy Assistance Program (LIHEAP) are also located in the BESS. A complete DEO organizational chart is included in the application. *(See attached DEO Organization Chart 2021.)*

Overall, there are 40 DEO funded Subrecipients statewide for providing WAP and/or CSBG and/or LIHEAP. There are 18 Subrecipients providing WAP services statewide (all 67 counties are served).

Financial assistance provided will be used to supplement and not supplant, state or local funds.

Florida's use of WAP funding from DOE described in this plan conforms to the rules and regulations issued by DOE for expenditure of WAP funding.

V.8.2 Administrative Expenditure Limits

The Florida WAP will follow the administrative expenditure limits outlined in Section 1011(g) of the Energy Act of 2020 and 42 U.S Code § 6865(a)(1), as amended, which states that "not more than an amount equal to 15 percent of any grant made by the Secretary under this part may be used for administrative purposes in carrying out duties under this part, except that not more than one-half of such amount may be used by any State for such purposes." There will be a direct split of 7.5% between Florida and its Subrecipients.

An exception to exceed the 15 percent administrative requirement shall apply to Subrecipients funded at less than \$350,000 of DOE funds. Subrecipient agencies are required to submit justification for administrative funds in excess of 5 percent of the total grant, with state approval based on the individual Subrecipient needs. However, in PY 2021, DEO has chosen not to include any additional Subrecipient Administration funds in the Budget beyond the minimum required.

V.8.3 Monitoring Activities

In accordance with 10 CFR 440, as the Grantee of the Weatherization Assistance Program, DEO has an established monitoring system for evaluating Subrecipients performance regardless of funding source. DEO adheres to WPN 20-4 and ensures that monitoring functions will be the state's principal method for determining Subrecipient compliance with the regulations contained in 10 CFR 440, applicable 2 CFR Part 200 - Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards, Weatherization Program Notices and any other procedures that DOE may issue.

Additionally, monitoring activities will ensure the evaluation of actual accomplishments against planned activities and determining the effectiveness of WAP

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

(Grant Number: EE0007912, State: FL, Program Year: 2021)

policy. Monitoring also provides objective reporting to and from Subrecipients and makes recommendations to address program and administrative deficiencies and needs.

Compliance Subrecipient Monitoring is staffed with eight monitors not dedicated to weatherization. A portion of staff salaries are paid for out of WAP Grantee administrative funding and WAP Grantee T&TA funding. The outsourcing of the state QCI activity will be covered in Grantee T&TA. Based on the proposed budget for the Program Year 2021, and taking a comprehensive approach (Desk monitoring, Site Monitoring, Post Monitoring Reporting and Closing Monitoring Assessment) the Grantee T&TA is approximately going to be \$19,000.00 or 6%, and administrative expenses such as salaries for monitoring purposes will be approximately \$22,080.00 or 11%.

Supplemental funding received from LIHEAP covers the remaining cost for salaries, monitoring and a portion of the outsourcing of additional QCI performed during monitoring visits. A breakout of projected monitoring expenditures to be charged to WAP is provided in the budget detail (PF-20A) of this State Plan indicating \$70,670.00 or 2% allocated for Quality Assurance Inspections.

DEO will monitor each subrecipient during PY 2021, which will be July 1, 2021 through June 30, 2022. Many of the WAP Subrecipients also receive funds through Department of Health and Human Services Community Services Block Grant and Low-Income Home Energy Assistance Program. Whenever possible, all three programs will be monitored during one visit to the Subrecipient.

During PY 2021, the state level QCI function will be outsourced utilizing certified QCI independent contractors. DEO will have on staff a Certified QCI. This added skillset incorporated at the state level will enhance the technical competency of the monitors as well as the Subrecipient network of technical staff.

Each Subrecipient will be monitored on site during PY 2021 by state WAP staff. The visit will consist of an administrative, fiscal and programmatic review in addition to completing state level required QCI on:

- a) At least 5 percent of the completed dwellings inspected for Subrecipients utilizing the Independent QCI option; and
- b) At least 10 percent of the completed dwellings inspected for Subrecipients utilizing the Independent Auditor/QCI option.

Quality Assurance Activities:

Based upon the review of the monthly program, fiscal and QCI Reports (QCIR) and the results of any modified or regular monitoring visits, the monitor may determine that additional on-site Quality Assurance (QA) visits may be warranted.

In the interim, the monitor will perform a desk monitoring of monthly reports and supporting documentation submitted to confirm the Subrecipient performance in regard to meeting agreement deliverables, reporting deadlines, material and labor costs and budget/expenditure. Monitoring schedules may also be changed based on the results of the review of the following items:

- The DEO Office of Inspector General audit,
- The last monitoring report,
- Most recent independent audit,
- Monthly fiscal reports,
- Up-to-date production records,
- A review of applicable board minutes,
- Interactions/communications with the Subrecipients' coordinator and fiscal staff,
- Needs or requests submitted by the Subrecipient, and
- Deferral units reported to the state office since the last monitoring visit. *

**Note: As referenced in Section V.I.2 Approach to Determining Building Eligibility, subsection "Describe the Deferral Process," a dwelling unit may be deferred services for a number of reasons. During the monitoring visit, the client files on any deferred clients will be reviewed for compliance to following guidelines and if applicable, consider visiting the deferred dwelling unit to confirm the conditions of situations that resulted in the deferral action being implemented.*

State Level QCI Monitoring:

Prior to conducting a monitoring visit, the Contract Manager will review the QCIRs that have already been submitted by the Subrecipient for completed dwellings. Any QCIRs that are questionable or have conflicting information will be earmarked for inspecting during the visit. Also during the visit, the credentials of the individual performing the QCI will be reviewed.

During the visit, if it is determined that there is a diagnostic testing result or workmanship issue that was not reported in the QCIR, the infraction will be brought to the attention of the individual who conducted the QCI and the Subrecipient to discuss how it was missed and what corrective actions are to be taken.

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

(Grant Number: EE0007912, State: FL, Program Year: 2021)

The Subrecipient will coordinate the required corrective action to be taken and have thorough photo documentation of the resolved issue. The QCI will be re-conducted and a new QCIR will be submitted to the state office along with all supporting photo documentation. The QCI individual will be put on notice and supporting documentation (photos and test readings) may be required to be submitted along with the QCIR by the Subrecipient for dwellings that had the QCI conducted by the same individual.

If applicable, the Subrecipient will be required to provide the state WAP office with the necessary changes that have been implemented in its implementation and oversight activities that will ensure the issue is not repeated on future dwellings. The Subrecipient may also be required to submit QCI supporting photo documentation of dwellings completed for review and approval when they are submitted to the state WAP office with a monthly Financial Activity (FA).

If there is a second repeat occurrence of a QCI failed inspection, the issue will be discussed with all parties (Subrecipient management, QCI individual and state WAP staff) to determine the best course of action. If it is determined that a QCI individual is not performing the task as required, that QCI individual may not be allowed to perform the QCI activity for Florida WAP Subrecipients or the state WAP office.

The monitor will work with the Subrecipient to find another certified QCI individual to avoid any delay in meeting production goals.

State Level Monitoring Instrument:

- Financial/Administration,
- Vehicles and Equipment Inventory,
- Audits,
- Financial Management/Accounting Systems,
- Payroll/Personnel,
- Records Retention,
- Invoicing,
- Contractor Procurement Process,
- Client Eligibility (Client File Review),
- Contractor Qualifications and Licensing,
- Pre and Post Inspections Results,
- Percentage of change-orders,
- Energy Audits,
- Preparation of Work Orders,
- Health and Safety Compliance,
- Weatherization Measures Installation,
- Quality Control Inspection Report,
- Qualifications and Training Assessment, and
- Needed Training and Technical Assistance.

The applicable percentage of each Subrecipient's completed weatherized dwellings reported since the last monitoring visit will have a QCI performed and at least one dwelling "in progress" will be visited in order to assess:

- Quality and compliance,
- Appropriate and allowable materials,
- Appropriateness and accuracy of energy audits,
- Comprehensive final inspections,
- Safe work practices, and
- Lead safe weatherization protocols.

In addition, one dwelling ready for bid (diagnostic tests completed and bid prepared) will be visited to ensure the accuracy of applicable testing that had been performed. During the visit, a Subrecipient may be required to conduct diagnostic testing procedures if it appears that the interpretation of the results is questionable and if additional training is needed.

The monitoring process consists of the following activities:

The visit:

- A formal notification of upcoming visit correspondence is sent to the Subrecipient to schedule the time frame of the visit. The correspondence will include a list of documents to be made available for review and other specific programmatic activities relating to weatherized dwellings.
- An entrance interview will be held with Subrecipient management and weatherization staff to discuss any previous non-compliance issues along with the agenda for the visit.

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

(Grant Number: EE0007912, State: FL, Program Year: 2021)

- During the dwelling inspection process, if any health and safety issues are found that present imminent danger to the household, the Subrecipient will be directed to immediately resolve the issues.
- The applicable QCI dwelling and files inspection will be performed.
- An exit interview is held and issues that will be addressed in the follow-up report are covered.

The report:

- A written report that describes the monitoring assessment is issued to the Subrecipient within 30 days of the visit.
- The report will identify any existing or potential non-compliance issues found during the visit.
- For non-compliance or workmanship issues found during the dwelling inspection, photo documentation is included.
- Corrective actions are recommended and the appropriate guidance document is referenced. Samples of best practices and what training is available may be provided if applicable.
- For issues regarding workmanship or measures installed on a dwelling that has already been reported as a completed unit, the Subrecipient is responsible for addressing the issue with the subcontractor and corrective actions should be the responsibility of the subcontractor.
- Disallowed costs will be reimbursed to the state.

Subrecipient response:

- Subrecipients will have 30 days after receipt of the monitoring report to respond.
- If the Subrecipient response and/or corrective action to be implemented are not sufficient to assure future compliance, additional clarification may be requested and the Subrecipient will have an additional 30-day time frame to achieve compliance.
- Failure by a Subrecipient to implement acceptable corrective actions or rectify a non-compliance issue at the end of the second response period may result in the Department withholding of program reimbursements until compliance is met.
- Follow-up visits may be scheduled as determined by state staff or requested by Subrecipient staff to focus on a specific area of concern or to provide specific oversight or training.

Risk Assessment:

Annually, a risk analysis assessment of each Subrecipient's past performance will be conducted after the program year to summarize the financial reviews, monitoring report(s) and any outstanding issues. From this assessment, each Subrecipient's needs, strengths and weaknesses may be determined and plans made to follow-up on providing the necessary T&TA to ensure future compliance. Subrecipients determined to be at risk could be placed in a probationary status for a period of time.

Upon being classified as an "at risk" Subrecipient and being placed on probationary status, the Subrecipient will be required to submit a detailed Corrective Action Plan (CAP) that will outline the processes to be implemented to address the issue(s) along with a timeline to achieve resolution. The monitor will assess the progress of the Subrecipient to determine the status of the resolution and that the submitted CAP is being implemented. If a site visit to the Subrecipient is warranted, it will be prioritized to be performed.

Failure by a Subrecipient to rectify the situation within the prescribed probationary time frame may result in the termination of the Subrecipient agreement and DEO seeking another provider of weatherization services for that area. For any Subrecipient that is considered "at risk," QA visits will become part of the state oversight activity to ensure the CAP is being implemented.

Subrecipient Audit Reviews:

All Subrecipients are required to submit a copy of their annual audit to the Florida Department of Economic Opportunity Office of Inspector General (OIG) for review. The OIG performs a preliminary review of the audit and then provides the audit and a technical review questionnaire to the Florida WAP office. WAP staff and management review the audit and discuss.

If there are findings regarding the Subrecipient's direct administration of WAP or indicate an organizational activity considered to be a material weakness or deficiency finding, WAP management provides comments and drafts a management decision letter for review. Then, upon consultation with OIG staff, the final management decision letter is provided to the Subrecipient.

WAP staff will follow up with the Subrecipient to address any questions or provide additional clarification in regard to corrective actions required to resolve the issue. As indicated in the QA section, additional onsite visits as applicable may be coordinated to ensure applicable corrective actions are being implemented to ensure resolution in a timely manner.

Subrecipient Termination:

If it is determined that a Subrecipient does not have the capacity to implement WAP to ensure compliance with all procedures, guidelines, etc. even after

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

(Grant Number: EE0007912, State: FL, Program Year: 2021)

substantial T&TA is provided by the state WAP office, that Subrecipient's agreement may be terminated.

V.8.4 Training and Technical Assistance Approach and Activities

DEO will evaluate the effectiveness of the State T&TA activities and needs throughout the program year and make adjustments where necessary to ensure effective subrecipient implementation of the grant.

Quality Control reviews will be conducted by a certified quality control inspector. Based on the findings of a quality control review, a subrecipient may receive onsite technical assistance aimed at improving individual subrecipient staff skills in assuring work quality. Technical assistance will be provided by the DEO reviewer or other monitoring staff. Attendance is required for those persons specified by the quality control reviewer. Overall energy audits will be reviewed to determine if the best weatherization measures with the highest potential energy savings have been called for or if additional training is needed.

Standard monitoring and technical assistance sessions often point out the need for one-on-one work with crew members. Subrecipient-specific needs may include such items as basic energy conservation concepts, program requirements and work techniques.

DEO believes that strong internal systems, oversight, training and technical assistance are essential to enable Subrecipients to achieve the objectives of the weatherization program. The training and technical assistance budget and narrative reflects the philosophy and will ensure quality weatherization work and adequate financial and programmatic management controls.

T&TA funding is used to pay salary, travel and operational cost for WAP staff and contractors to provide monitoring T&TA to Subrecipient and contractor staff. Subrecipient expenses for participation in T&TA activities will be funding from DOE T&TA and other funds.

The purpose of all training and technical assistance will be to maximize energy savings, improve program and operation efficiencies, improve crew/contractor work quality, reduce the potential of waste, fraud, abuse and mismanagement, and increase client satisfaction.

DEO will use the following methods to provide T&TA:

1. DEO staff or contractor(s) will provide on-site or off-site T&TA as needed. Needs may be identified by the Subrecipient staff, DOE project officer monitoring visits, internal state audits, Inspector General reports or by DEO staff as a result of observation for resolution of problems or to meet updates required by DOE.
2. On-site visits provide firsthand, observable evidence for T&TA. Therefore, through monitoring, DEO staff will analyze data on a variety of financial, production and weatherization retrofit information. Trends indicating extremes high/lows in production and completed weatherization measures will be noted and tracked for appropriate follow up. Technical weatherization skills will be closely monitored and any deficiencies will be shared with Subrecipients and specific training requirements will be mandated.
3. Subrecipients will have the opportunity to identify and address their own T&TA needs through local initiatives.
4. DEO will contract with the "Florida Association of Community Action (FACA)" to develop and implement a WAP training plan for PY 2021-2022. The primary goal of the plan is to provide continuing education and certification opportunities for practitioners of the Florida WAP. Training offerings will include remedial workshops based on QAI outcomes, Energy Auditor, Pre-requisites for Energy Auditor, Customer Services Best Practices, annual weatherization conference sessions, software training, Combustion Testing, Occupational Safety and Health Administration (OSHA) Standards, Blower Door Assisted Weatherization, Certified Renovator, ASHRAE 62.2 2016, NEAT updates, as well as Quality Control Inspector.
5. Florida requires successful completion of certification training for all inspectors. Requirements include: BPI Energy Auditor (EA) and Quality Control Inspection (QCI) Certification, Mobile Home Inspection Training, LSW certification, OSHA 10 and 30 Hour. For current certified staff, use of continuing education credits to maintain certification will be funded through T&TA funds. DEO allocates T&TA funds to each subrecipient for the mandated training, as needed.
6. DEO will continue to utilize Everblue through the FACA contract to conduct BPI EA, QCI, and building science trainings throughout the year and procure a trainer directly to the state that is IREC accredited in all required areas.
7. As needed, subrecipients may receive targeted training for single issue, short-term training pertaining to identified field deficiencies and/or enhancement of existing knowledge, skills and abilities.
8. A WAP Production Snapshot has been instituted to maintain records of staff and their associated training certifications to assess future needs within the program and to send notifications. A SERA integrated credentialing solution will be released to replace the monthly Production Snapshots.
9. DEO management and subrecipient staff will attend DOE mandated activities/events, NASCSP events, state weatherization managers' meetings, national DOE conference and other staff development trainings as needed or required.

Provision of Training and Technical Assistance:

1. On-site technical assistance visits will be conducted by DEO monitoring staff, as requested or required. Any Subrecipient experiencing management,

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

(Grant Number: EE0007912, State: FL, Program Year: 2021)

- production, operational or compliance problems will be provided technical assistance and a plan of recommended corrective action. Verbal recommendations will be given to the Executive Director, Weatherization Director or Weatherization Coordinator prior to the end the visit. A letter or a monitoring report reiterating those recommendations will be sent within 30 days of the visit and a follow-up visit will be made to evaluate progress.
2. Subrecipients will have the opportunity to select a training provider for meeting the training needs recommended and mandated by the DEO WAP office. Subrecipients must have DEO approval for all out-of-state training and travel costs. It is strongly recommended that Subrecipients utilize local/in-state training resources to maximize their T&TA funds.
 3. Should a Subrecipient hire a new Weatherization Director/Coordinator, the Subrecipient is required to notify DEO in writing within 30 days of the date of hire and request training. DEO will contact the Subrecipient within 30 days of receipt of notification to arrange for training. DEO will use in-house staff and/or other weatherization professionals to provide training.
 4. Subrecipients may use available T&TA funds to support locally initiated training and to make effective use of available state training venues. To assure coordination of training activities, all Subrecipient T&TA funds shall be itemized and budgeted into the following categories:
 - Costs for travel and per diem for attendance at all DEO hosted T&TA workshops, seminars, meetings or classes.
 - Supplemental training not offered by DEO for Subrecipient staff training must relate directly to the attendee's WAP job duties.
 - Purchase of training materials, including training and testing costs, necessary to meet OSHA safety standards.
 - Percentage of salary for a staff person responsible for ensuring that training, safety requirements and needs are met and to oversee in-house weatherization training.
 5. To assure coordination of training activities, all Grantee T&TA funds shall be itemized and budgeted into the following categories:
 - Purchase of training materials, including training and testing costs, necessary to meet OSHA safety standards.
 - Travel for DEO WAP staff to attend conferences, meetings, trainings and seminars.
 - Other T&TA initiatives in conjunction with local T&TA programs.
 6. DEO shall continue to assure and effective exchange of program information through:
 - Active involvement with the WAP Policy Advisory Committee (PAC).
 - Promotion of statewide meeting initiated by the Florida Weatherization Network (FWN) Council and representatives of the PAC at which management, technical and general informational topics will be discussed according to current need.
 - Scheduling statewide weatherization meetings to develop new training approaches and refine the existing courses to best meet the needs of the Subrecipient.
 - Updates to program management guidance, including operations memos, information updates and revisions in the Policy and Procedures Manual, when necessary.
 - Encouragement of information exchange and skills transfer among Subrecipients on an informal basis.

Attendance/Training Requirements

To help insure an adequate level of knowledge and understanding among individuals who perform certain duties, Florida will adopt the DOE Standardized Training Curriculum as the reference for minimum training requirements.

Comprehensive Training:

Comprehensive training will be provided by accredited IREC training providers. In compliance with Section 4 of WPN 15-4, DEO will track that comprehensive training for each job category (i.e. Retrofit Installer/Technician, Quality Control Inspector, and Energy Auditor) is obtained within one year of being hired and that re-training occurs thereafter every three years.

Whereas it is the responsibility of DEO to provide funds for training through IREC training providers, it is the responsibility of the Subrecipient to ensure training is completed by staff and/or subcontractors. DEO will work to develop a plan to assure subrecipients ensure their contractors obtain and maintain the required Tier 1 training certifications. DEO will monitor Subrecipient progress and track credentials. Weatherization staff may not function unsupervised until training and certification requirements are met.

Specific Training:

Specific training will be provided by DEO training and technical assistance staff or its designee. Training topics will include but not be limited to:

- Annual Network Training during the Florida Association of Community Action Conference
- Annual Winter WAP Training Workshop
- Project Management 101
- Procurement regulations under 2 CFR 200

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

(Grant Number: EE0007912, State: FL, Program Year: 2021)

- NEAT/MHEA
- Transition to Online Weatherization Assistant
- ASHRAE 62.2
- Standard Work Specifications Review
- Peer Exchange Training and Technical Assistance

Attendance at state sponsored training may be required based on the importance of the topic and information to help correct program deficiencies or to ensure competence in specific areas. In such cases, Subrecipient attendance *will be mandated as a matter of program compliance*.

Assessment of State T&TA Activities

Effectiveness of T&TA activities will be evaluated through the following:

- Local training activities and local T&TA expenditure reports,
- Quarterly review of the Florida WAP training tracking database to measure and track training efficiency,
- Onsite monitoring and observations and reporting of improvement in work standards,
- Review of local T&TA curriculum and activities,
- Formal evaluation forms completed by participants to statewide training workshops, and
- Surveys to Subrecipients and contractors.

Client education has been provided over the years by different methods in each area of the state, ranging from detailed discussions with clients during pre-and post-inspections to access to program-related publications. DEO will continue to require WAP Subrecipients to provide client education to each WAP client. Subrecipients will be required to provide (at the minimum) educational materials in verbal and written format.

The Florida WAP will assess fuel savings effectiveness using data provided by the Subrecipients on pre-and post-weatherization energy usage derived from client-submitted energy bills. This analysis provides DEO with the information on a sampling of weatherized units that allows staff to identify significantly high and significantly low performers. DEO will analyze the data for T&TA purposes that allows them to compare effectiveness within a Subrecipient's area and between Subrecipients. The need for additional T&TA will be identified through these comparisons.

Percent of overall trainings

Comprehensive Trainings:	50.0
Specific Trainings:	50.0

Breakdown of T&TA training budget

Percent of budget allocated to Auditor/QCI trainings:	40.0
Percent of budget allocated to Crew/Installer trainings:	40.0
Percent of budget allocated to Management/Financial trainings:	20.0

V.9 Energy Crisis and Disaster Plan

The purpose of DEO's disaster plan is to provide emergency services to low-income individuals and families affected by a disaster as determined by a Presidential or Gubernatorial order declaring either a federal or state emergency. WAP grant funds have a very limited role in any disaster response. Funds are limited to eligible weatherization activities and the purchase and delivery of weatherization materials.

Subrecipients will be required to prioritize service to buildings occupied by disaster victims. In some cases, Subrecipients covering adjacent areas will be allowed to perform work in disaster areas, with the consent of the Subrecipients that primarily serves that area. Work will be limited to allowable program measures. In cases where a previously assisted unit has been damaged by fire, flood or other natural disaster, assistance can be provided with prior approval from DEO.

The DOE-issued WPN 12-07 provides guidance on the use of WAP in the event of disasters. In the event of a declared disaster, DEO will issue a State Weatherization Program Notice clarifying the policies, procedures and activities that will be allowed to be implemented by Subrecipients in the declared area.

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

(Grant Number: EE0007912, State: FL, Program Year: 2021)

Weatherization service requests received from households located in the disaster area may need to be reprioritized. Households eligible to be prioritized are those households that meet one of the priorities established in regulations and are free and clear of any insurance claim, or other form of compensation, as a result of damage incurred by the disaster.

Other disaster related activities that may be considered but will require prior approval from DEO include:

- a. Debris removal at a dwelling unit so that the dwelling can be weatherized;
- b. Weatherization personnel can be paid to perform functions related to protecting DOE WAP investment, such as:
 - i. Securing weatherization material, tools, equipment, weatherization vehicles; or
 - ii. Protection of local Subrecipient weatherization files, records and the like during the initial phase of the disaster response.

Weatherization vehicles and/or equipment may be used to help assist in disaster relief provided that WAP is reimbursed in accordance with Title 2 CFR Part 200.

The cost to pay for weatherization personnel to perform relief work outside the scope of weatherization due to a disaster is not allowable.

The total allowance for the installation of each weatherization measure is limited to the current maximum reimbursement per Subrecipient contract.