

Community Services Policy Manual

# 600 Series

DOE Policy

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Below are the base offerings for the existing Michigan Weatherization Assistance Program Network:

Learning objectives:

**Course Catalog for Specific Training:**

**Learning Objectives:**

**Class:**

**Certification:**

**Regular Training and Updates:**

**Conditions for low production and/or delays include:**

## Attachment to 619 – Michigan SHPO WAP Exemption Guide

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## REFERENCES

- 10 CFR Part 440, Weatherization Assistance Program for Low-Income Persons
- Federal Register, Department of Health and Human Services (HHS) Annual Update of the HHS Poverty Guidelines
- Department of Energy (DOE) Weatherization Program Notice 3 (of current year)

## PURPOSE

Title IV, the Energy and Conservation Production Act, as amended, states that all grant awards made under this program shall comply with applicable law, including regulations contained in 10 CFR Part 440.

## POLICY

The Grantee is required to use the 200 percent of federal poverty level income guidelines to determine eligibility for the DOE Weatherization Assistance Program (WAP). Income refers to total cash receipts (gross) before taxes from all sources (see Income Inclusions/Exclusions below) for all household members.

## Applicant's File

Grantees must maintain a file for all recipients of weatherization services. A copy of the client's FACSPRO Customer Report or the DHS-4283 with original client and agency signatures must be in the physical file. All other required file documents must be uploaded onto FACSPRO (See CSPM Item 612, CSPM Item 903, and CSPM Item 909).

## Re-Certification of Application

An applicant must be re-certified when income eligibility lapses due to the length of time the applicant was waiting to receive Weatherization services. Re-certification, the redetermination of a household's income eligibility, must occur at least every 12 months from the eligibility date, if the energy audit has not yet been initiated. The eligibility date is the date that the agency determines eligibility. This date must be within 30 calendar days from the date all documents needed for income eligibility determination are received. In WxPro, this date defaults to the date that the client action plan is created. (See CSPM Item 612).

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## Automatic Income Eligibility

A household is automatically income eligible if any household member received any of the following payments at any time during the 12-month period preceding the application date:

- Cash assistance payments under Title IV (FIP) or, XVI of the Social Security Act (SSI)
- Assistance under the Low-Income Home Energy Assistance Act of 1981 (SER)

**NOTE:** The receipt of these benefits in the previous twelve months must be documented in the case file. The State's quarterly SSI payments do not need to be documented but must be included in the calculation.

## Household Composition

Income from all household members is used to determine income eligibility. A household is all persons occupying a housing unit, regardless of whether they are related.

## Roomers

The "roomer" is not considered a member of the "household" and the income of the "roomer" is not counted for income eligibility. However, the rent from the roomer should be included as income. When calculating income, the income from rent payments should be included for the months the rent was received.

## Income Computations

Income eligibility must be determined before the eligibility date is set and the client action plan has been created in FACSPRO. In FACSPRO, the create interaction button creates the action plan, determines the eligibility date and stores the income screens that are used to determine income eligibility. The income screens for all household income must be completed with the current, relevant, assessed income eligibility information before the create interaction button is clicked.

An applicant's household's gross **ACTUAL INCOME** for the *preceding three-month period including the application date* is computed in FACSPRO to be **annualized**.

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Gross income is the total income received before deductions such as taxes, medical premiums, retirement plans, garnishments, child support, or other deductions. Gross income for all household members (except as specifically excluded) is countable income.

For example, an application with an application date of June 7 would have a three-month income calculation period of March 8 – June 7. Income must be entered into FACSPRO using the Annual option and entering the last three months of income.

**Note:** If a three-month lookback period is not representative of a household member's annual income, Grantees have the option of requesting a *six or twelve-month period* of documentation. An explanation of using this option must be clearly noted.

For each household member, the income computation process should include actual received current gross income documentation, current and prior monthly benefit documentation, W-2s or income tax returns for prior year's income, and, **as a last resort**, self-declarations. (See **Self-Declarations** below).

**Best Practice-** Pay period ending dates should not be used unless it is documented that the applicant/household member receives their payments on the same date.

## Documentation of Income

Income must be thoroughly documented and uploaded to FACSPRO (See CSPM Item 612 and CSPM Item 909). The following items are acceptable documentation:

- Copies of paychecks or pay stubs
- Written statements from employers
- Letters, benefit statements, or other documents from income sources, e.g., DHHS, Social Security, VA
- Unemployment Benefit determination letter or online benefits information
- If self-employed, accounting and other business records, and/or other documentation showing net income after business expenses.
- W-2 statements and tax forms

**Note:** W-2 statements and tax forms will seldom be adequate by themselves, since they usually report a period ending well in advance of the application date. An exception may be made for the self-employed, since tax records are a

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convenient source of information about their income. They should be used, however, in conjunction with a self-declaration.

- Other documents the Grantee has reason to believe will **fully verify** the annual or annualized income of the applicant

### Self-Declarations of Income

If the self-declaration is for zero income **for the entire household**, after all other avenues of documenting income eligibility are exhausted, self-declaration is allowable, *but evidence of the various attempts at proving eligibility must be contained in the client file, including a notarized* statement signed by the applicant indicating that no other proof of income is available.

Approval by MDHHS BCAEO staff is also required, and a copy of the approval must be in the client file. Requests for approval must be submitted by email to the Grantee's grant manager. The requests should include the name and FACSPRO System ID for each household member and an explanation of how the household is paying for their living costs.

### Income Guidelines

Refer to CSPM Item 208, Poverty Income Guidelines, for the current federal poverty income guidelines.

### INCOME INCLUSIONS/EXCLUSIONS

#### Income Includes:

1. Gross wages/earnings and salaries before any deductions.
2. Self-Employment Income for each type of self-employment activity or business (See Self-Employment Income section below).
  - Net receipts from non-farm or farm self-employment (receipts from a person's own business or from an owned or rented farm after deductions for business or farm expenses)
3. Wages from Assistantships, Work Study, and Student Stipends.
4. Social Security (Retirement, Survivor's, Dependent's, and Disability Insurance Income) gross benefits, **including any** Medicare premium\*.



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5. Supplemental Security Income (SSI)\*.
6. Railroad Retirement payments\*.
 

**\*Note:** Retroactive lump sum payments for Supplemental Security Income (SSI), Social Security Insurance or Railroad Retirement Benefits should be prorated on a 12-month basis so that only benefits covering the three-month calculation period are included.
7. State SSI Supplemental Quarterly Payment.
8. Unemployment Compensation Benefits, Strike Benefits from Union Funds.
9. Worker's Compensation, and/or private Long and Short Term Disability Payments.
10. Veteran's Payments: VA Service Connected Disability Compensation; VA Non-Service Connected Disability Pension; Military Retirement Pay, and Military Family Allotments.
11. TANF- Family Independence Program-FIP (Cash Assistance Title IV) and State Disability Assistance (SDA)
12. Alimony or Spousal support.
13. Private Pensions, Government Employee Pensions, and other Retirement income (not including Social Security Retirement Income).
14. Annuity Payments and Insurance Payments.
15. Income from Individual Retirement Accounts (IRAs) received during the computation period, whether received as monthly or in a lump-sum withdrawal.
 

**Note:** Lump-Sum IRA withdrawals should be prorated on a 12-month basis and the three months of prorated amount should be included in the computation.
16. Income from Dividends, Interest, Stocks or Bonds.
17. Net Rental Income, including income from Roomers.
18. Training Stipends
19. Net Royalties; Net Gambling/Casino, or Lottery winnings.
20. Periodic Receipts from Estates or Trusts.
21. Tribal Payments - Any payments received by Native Americans, such as income from Casinos or other Tribal Income.
22. Joint Income received by more than one individual. Divide the income equally among recipients.

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23. Third party benefits paid directly to a company for a client's housing or bills. Third party benefits are only counted as income if they are paid to a company or entity in lieu of paying an individual Alimony or Wages directly.

**Income Excludes:**

1. Combat Zone pay to the Military.
2. Housing assistance to the Military.
3. Capital gains or money from the sale of a house, property or vehicle.
4. Any assets drawn down as withdrawals from a bank or financial institution.
5. Emergency Assistance Program payment to a family or a person who is in temporary financial difficulty.
6. Tax Refunds or Earned Income Tax Credit.
7. Loans or Gifts.
8. Lump-Sum Inheritances
9. Compensation for injury or One-time Insurance Payments.
10. Non-cash benefits such as the employer paid or union paid portion of health insurance or other employee fringe benefits (including the imputed value of health insurance for domestic partners).
11. Food or housing received in lieu of Wages/Earnings (in-kind).
12. The value of food and fuel produced and consumed on farms or the imputed value of rent from owner-occupied non-farm or farm housing, depreciation for farm or business assets.
13. Federal Non-Cash Benefit Programs such as: Medicare (Medicare premiums are **not** excluded), Medicaid, Food Assistance Program benefits (including cash received in lieu of food stamps), school lunches, Housing Assistance, Childcare Vouchers, WIC, LIHEAP, or Affordable Care Act Subsidy.
14. Reverse mortgages.
15. College Scholarships and Grants.

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16. Child Support.

17. Foster Care Payments (including Foster Grandparent Payments), Adoption Subsidies, Family Support Subsidies, Independent Living Stipends (Foster Care) and Guardianship Assistance Payments.

18. Student Income - Income earned by a child age 18 and under **and** attending high school.

**NOTE:** "Earnings" do not include program benefits such as Social Security, Supplemental Income (SSI), etc.; these ***are included*** in the total household income.

### Self-Employment Income

Self-employment income must be documented for each type of self-employment activity or business.

Business expenses may be deducted from the gross income amount determined for each self-employment activity/business.

Documentation of claimed expenses must be included in the client file information.

**NOTE:** Losses from a single self-employment source of income cannot be applied to any other self-employment income or other household income types.

**Example:** if self-employment business A realizes a loss of \$10,000, the income from that source is considered zero. The \$10,000 loss cannot be deducted from self-employment business B or other household income.

### Self-Employment Expenses

Allowable expenses include all of the following:

- Identifiable expenses of labor, stock, raw material, seed, fertilizer, etc.
- Interest and principal on loans for equipment, real estate or income-producing property
- Insurance premiums on loans for equipment, real estate and other income-producing property.
- Taxes paid on income-producing property.

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- Transportation costs while on the job (example: fuel)
- Purchase of capital equipment.
- A child care provider's cost of meals for children. Do **not** allow costs for the provider's own children.
- Any other identifiable expense of producing self-employment income except those listed below.

The following are **not** allowable expenses:

- A net loss from a previous period.
- A net loss from another type of self-employment.
- Federal, state and local income taxes.
- Personal entertainment or other individual business expenses.
- Money set aside for retirement.
- Depreciation on equipment, real estate or other capital investments.

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## 602 – PROGRAMMATIC REPORTING

### REFERENCES

- Weatherization Assistance Program (WAP) Program Agreement
- Weatherization Program Notice 21-1

### PURPOSE

The WAP Agreement, Section II, requires the submission of a monthly programmatic report, via FACSPPro and the DHS-1071 as indicated below.

Further, the Agreement requires the Grantee be monitored and all related client records and files be made available for review.

### POLICY

The Grantee is required to have all Weatherization jobs for the reporting month entered by the fourteenth day of the following month into the FACSPPro database.

Example: All jobs reported complete for the month of June must be entered into FACSPPro by close of business July 14.

NOTE: If a Grantee is entering any completed jobs in the first 14 days of the month following the report month, the Grantee must change the pull funding date in FACSPPro to a date in the month of the reporting period.

### WAP Monthly Programmatic Report FACSPPro 1071

#### Summary

BCAEO will extract the monthly report for each agency from FACSPPro the fifteenth day of the following month. Grantees can also generate their own 1071 reports from FACSPPro for each month for their own documentation. Grantees should be verifying each month that the report is correct in the database.

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The Grantee must enter each Inspection field sheet, audit, cost for each job through the WxPro Module of the FACSPRO system.

The data for each WAP unit is gathered from FACSPRO jobs that are in Final Close Out and have costs on the Cost Center.

EXCEPTION: For multi units (5+ and more units per building) with shared heating systems, or shelters, use the Excel formatted 1071 to report these job completions.

All demographics are pulled from the household at the time the action plan was created in FACSPRO. Re-weatherized units will be counted on the FACSPRO 1071 report automatically from information entered into FACSPRO upon intake.

Weatherized units are considered complete based on date of final close out in WxPro and a completed cost center. Jobs completed in the reporting month must be moved to final close out by the 14<sup>th</sup> day of the following month. Jobs completed in the reporting month may not be moved to final close out after that date without approval from the BCAEO.

After the 14<sup>th</sup> day of the month following the report month, Grantees will be unable to pull funding and move jobs to Final Close Out without contacting BCAEO. The Grantee must contact BCAEO, provide documentation on why the jobs is being reported late and follow the plan laid out by BCAEO staff to have the job moved.

If a Grantee wishes to adjust any jobs that have been moved to final close out for a preceding month, the Grantee must make a request to BCAEO that specifies the intended changes and a justification for making these changes to jobs that have been previously moved to final close out.

### **Completed Units**

A dwelling unit shall not be considered as completed until all of the following have occurred and are documented:

- All intake documentation has been entered and uploaded into FACSPRO
- A FACSPRO generated IWC has been created
- Audit performed and entered into FACSPRO
- An SIR driven work order has been created using WA 8/FACSPRO
- A Quality Control Checklist has been created and signed by the Energy Auditor.

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- All weatherization materials have been installed in compliance with the Michigan Weatherization Field Guide, SOM policy, rules and regulations.
- The Crew Leader has signed the Quality Control Checklist showing all measures were installed and are in compliance.
- The Grantee has verified that all required/appropriate forms and documentation are included in the client/job file and is uploaded into FACSPRO. See CSPM 612 for applicant file documentation requirements.
- The Grantee, or its authorized representative, has performed and approved final inspection as a certified Quality Control Inspector.
  - The final inspection must take place as an assessment of all measures on the work order. An agency may not make multiple payments for the initial Quality Control Inspection.
- The certified Quality Control Inspector completes the Quality Control checklist and verifies all measures have been completed and are in compliance. The Cost Center is completed with costs in appropriate funding columns.

### **Justified Reason to Stop Work**

In cases in which weatherization work was started but cannot be completed for a justified reason, signed and dated documentation shall be provided in the client job file as to why the weatherization work has stopped. Examples of reasons to stop weatherization work:

- Death of a client
- Dwelling is vacated and/or sold.
- Unable to contact client after numerous, documented attempts.
- Client refuses further weatherization work.
- Client refuses Health and Safety measures.
- Health and safety risks to contractor/crew (e.g. unsanitary conditions, drugs, threats, etc).

Note: Such circumstances must be documented in the case file and in the action plan and customer notes portion within the FACSPRO database. The job must not be moved to the Final Close Out Queue in WxPro and is not considered a completion. This work may be reimbursed on the agency's Statement of Expenditures but will not count as a completed job and will impact the agency's average cost per unit.

### **Defining a DOE Unit**

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DOE defines a DOE Weatherized unit as: A dwelling on which a DOE-approved energy audit has been applied and weatherization work has been completed. As funds allow, the measures installed on this unit and paid for with DOE funds have a Savings-to-Investment Ratio (SIR) of 1.0 or greater considering final costs, but also may include any necessary energy-related health and safety measures.

No DOE funded Health & Safety measures can be performed in a home unless at least one DOE costed Energy Conservation Measure (ECM) is also part of the scope of work.

Incidental Repair Measures and ancillary measures cannot be installed unless they are linked to an individual ECM or package of ECMs paid for out of DOE funds.

### **Production Reporting**

The Grantee is required to submit the mdb files for all jobs completed through the program year. These files must be submitted by the 14<sup>th</sup> day of the month following the end of each quarter.

BCAEO Technical monitors may determine that quarterly files following the first quarter be submitted using wdz files as appropriate. Instruction will be provided to each Grantee.

### **Submittal Process**

The MDB and/or WDW files must be uploaded into the agency's SharePoint folder under:

\_Weatherization Assistance Program →  
     \_Libraries →  
     PY folder

### **Window Replacement Reporting**

Beginning in PY21, DOE was directed by congress that the occurrence of window replacements supporting the reduction of lead-based paint hazards, must be tracked and reported in the WAP. DOE has not yet released the format of the reports to state offices. Beginning in PY21, agencies are required to track these types of window replacements and report them to BCAEO. If the tracking tool is not complete in the statewide database at the beginning of PY21, agencies must track with their own records until a different mechanism is in place.



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## 603 – OVERSIGHT OF LOCAL WEATHERIZATION PROGRAMS

### REFERENCES

- 10 CFR Part 440, Weatherization Assistance Program for Low-Income Person
- Department of Energy (DOE) Weatherization Program Notice 15-4
- WAP Memorandum 034
- Michigan Weatherization Field Guide
- WAP Agreements

### PURPOSE

The Weatherization Assistance Program (WAP) State Plan provides for monitoring of the Weatherization program by the BCAEO weatherization technical monitors and Grantee monitors. Monitoring of dwelling units is conducted by the Grantees during the final inspection process and during jobs in progress; monitoring by the BCAEO technical monitors will occur at least annually. Grantees can use this as guidance when conducting the same internal monitoring process.

### POLICY

To provide adequate oversight, it is the Grantee's responsibility to train and provide information to the subcontractors on the WAP policies to ensure that subcontractors perform in accordance with weatherization standards and comply with all rules and regulations.

To provide oversight, the Grantee is required to have, at a minimum:

- Procedures to ensure that agreements are entered into only with competent subcontractors.
- All staff and contractors completing weatherization work in compliance with the Standard Work Specifications (SWS) outlined in the Michigan Weatherization Field Guide and the Community Services Policy Manual (CSPM). All contracts must have this language included.
- A system for monitoring subcontractors and dwelling units.

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- A system to provide technical assistance to subcontractors as needed.
- Documentation in FACSPRO of all monitoring and technical assistance provided, all trainings and certifications, to include at a minimum, who was trained on what subject on what date they were trained and certified, if applicable.
- A system to track grantee and BCAEO monitoring findings and observations by auditor/inspector, contractor, and/or worker to ensure that repeated program deficiencies observed are addressed appropriately and swiftly.
- A system to track training and certifications for those performing work on units for the Weatherization Assistance Program. All Weatherization training for staff and contractors must be entered into FACSPRO.

### **State of Michigan WAP Technical Monitoring**

Technical monitoring will work to ensure compliance with all DOE WAP and HHS regulations and guidance, and MDHHS policies. Technical monitoring will include, but is not limited to, a review of the following areas:

- Any outstanding findings, previous year's findings, and required corrective actions
- Program requirements for all funding sources including Health & Safety compliance
- Materials standards and specifications
- NEAT/MHEA setup libraries (copies of each shall be provided by Grantee)
- NEAT/MHEA mdb production shall be provided by Grantee (wdz files may be submitted subsequently on a quarterly basis)
- Contractor Licensing, Certifications, and Insurance requirements
- Work specifications (e.g. FACSPRO generated Work Order(s) including change orders)
- Quality Control Checklist completion
- Quality control procedures
- Approved audit (IWC) completeness and storage using FACSPRO
- Financial reconciliation for all job cost and invoicing reported in the FACSPRO WxPro module.
- Compliance with blower door testing requirements
- Infrared camera requirements
- Combustion Appliance testing protocol

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- Correct audit selection & completion
- An in progress site visit with the Contractor/crew (working)
- Trend analysis of best practices, observations, questioned costs or findings

File selection and site visit monitoring and review will be chosen using the FACSPRO WxPro Monitoring module. BCAEO Technical Weatherization monitors will monitor 10% of agency file documentation and complete 5% site visits for each agency. BCAEO makes every effort to have an accurate estimated production count for each agency in order to meet the 5% requirement for onsite monitoring. In cases where it is revealed through the final production count that an agency has exceeded production to a point where an additional onsite monitoring would have been required to meet 5%, the BCAEO technical monitor will add an additional job to his or her onsite monitoring in the following program year.

Grantees that run a program with a production of 30 units or less, or Grantees experiencing a staffing barrier to complete production, may apply for a waiver to use the same inspector to perform the energy audit and the quality control inspection. BCAEO Technical Weatherization monitors will complete 10% site visits and 20% file reviews for Grantees that use this option. The Grantee must request a waiver from BCAEO before utilizing this option. Waiver requests shall be sent as an email to [MDHHS-BCAEO@michigan.gov](mailto:MDHHS-BCAEO@michigan.gov) and shall include the agency's justification for using this option. If approved, the waiver will be valid only for the program year for which it is being requested. In addition, BCAEO will conduct more follow-up reviews and require the agency to implement a Corrective Action Plan to resolve the issues that necessitated the waiver request within the program year or 6 months from waiver approval. BCAEO may require the Grantee to schedule monthly calls with BCAEO to determine the agency's progress to increase staffing capacity.

### **In Progress Technical Monitoring**

In addition to monitoring completed units, monitors inspect units in progress to identify best practices and/or shortfalls early in the process and to allow for onsite training and technical assistance opportunities in lieu of potential disallowed costs (as resources permit). The in progress monitoring is intended to serve as training and technical assistance.

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### **Annual Monitoring**

Technical Weatherization staff will conduct annual monitoring beginning July of each calendar year. The annual monitoring will review contractor rosters, the process for awarding jobs, insurance for contractors, compliance submitting quarterly mdb files, weatherization worker certifications and training, compliance with documentation in FACSPRO and audit library set up.

**COVID-19 Safety** Grantees must follow MIOSHA standards for COVID safe work.

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Community Services Policy Manual	SUBJECT: Weatherization Assistance Program  <b>ITEMIZED SUBCONTRACTOR INVOICES</b>		EFFECTIVE DATE <b>7/1/2020</b> ISSUE DATE <b>05/02/2016</b>

## 604 – ITEMIZED SUBCONTRACTOR INVOICES

### POLICY

The Grantee may not make discretionary allocations on a subcontractor invoice. All private subcontractor invoices are required to contain a job number and labor/material costs (split or combined) for each job.

The Grantee is required to use the invoice and the IWC work order pages to verify actual work completed prior to payment to the subcontractor.

Quality Control Checklists must be signed and dated by the Energy Auditor, Crew Leader and Quality Control Inspector (QCI). The QCI must sign off indicating that measures have been installed to Michigan Field Guide/Standard Work Specifications before payment may be made to the contractor that installed those measures. All queues in WxPro must be maintained within the appropriate timeframes. Please refer to CSPM 905 for these timeframes.

If the Grantee has contractors use an internal invoicing/billing document, the contractor must sign the invoice showing that the invoice is correct for each item.

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Community Services Policy Manual	SUBJECT: Weatherization Assistance Program  <b>REWEATHERIZATION OF DWELLING UNITS</b>		EFFECTIVE DATE 7/1/2021 ISSUE DATE 3/31/2009

## 605 – REWEATHERIZATION OF DWELLING UNITS

### REFERENCES

10 CFR Part 440, Weatherization Assistance Program for Low-Income Persons  
 WAP Memorandum 075  
 Energy Act of 2020

### PURPOSE

10 CFR Part 440.18(e)(2)(ii) states that a dwelling unit that has been previously weatherized under the Weatherization Assistance Program may receive additional weatherization services

if 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.

Section 1011(h) of the Energy Act of 2020, also amended 42 U.S. Code § 6865(c)(2) and removed the reweatherization date and alternatively created a “rolling” option:

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 under this part until the date that is 15 years after the date such previous weatherization was completed. This paragraph does not preclude dwelling units that have received previous weatherization from receiving assistance and services (including the provision of information and education to assist with energy management and evaluation of the effectiveness of installed weatherization materials) other than weatherization under this part or under other Federal programs, or from receiving non-Federal assistance for weatherization.

Please note, the inclusion of “other Federal programs” includes all Federal funds including LIHEAP, HUD, or USDA “weatherization” activities.

### POLICY

A maximum of 50 percent of a Grantee’s total production each program year may represent reweatherized units that meet the criteria above.

Each dwelling to be weatherized is required to receive a new energy audit that takes into account any previous energy conservation improvements to the dwelling.

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Reweatherized units will be reported separately on the Weatherization Assistance Program Monthly Programmatic Report, DHS-1071. See Item 602 for further guidance on the 1071 report.

Reweatherized units will be reported as completions for purposes of compliance with the allowable maximum average cost per unit as established in the Community Services Policy Manual Item 613.

Although reweatherization is allowable as guided above, the priority is to serve dwelling units that have not been previously weatherized.

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## 606 – PROGRAM REQUIREMENTS

### REFERENCES

- 10 CFR Part 440, Department of Energy (DOE) Weatherization Assistance for Low Income Persons Program Regulations
- 10 CFR Part 600, Financial Assistance Rules for DOE
- State of Michigan DOE State Plan
- Weatherization Program Notices 21-1, 19-4
- Standard Work Specifications (SWS)
- Michigan Weatherization Field Guide

### PURPOSE

DOE requires that certain Weatherization Assistance Program (WAP) requirements are met.

### POLICY

Grantees are required to administer this grant following the U.S. DOE WAP regulations and guidance. The CSPM will prevail when the manual has policy that contains requirements different from WAP regulations.

The Grantee will determine which weatherization measures will be completed on an eligible dwelling unit in accordance with the Michigan Weatherization Field Guide and the Inspection/Testing/Energy Audit Requirements.

### General Program Requirements

The Grantee shall weatherize eligible dwelling units in its service area as detailed in the Grantee's DOE WAP Service Plan, as approved by MDHHS.

The Grantee will maintain a basic service system which includes an outreach/intake system, a method of installing measures, audit and inspection procedures, qualified crews and/or subcontractors, and maintenance of quality control procedures to ensure each dwelling weatherized is completed in compliance with all program requirements.



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All weatherization work must have an independent Quality Control Inspector (QCI). The QCI is an individual that has no involvement with prior work on the home either as the auditor or as a member of the crew. If the QCI is not agency staff, but working as a contractor, he or she may not be employed by a contractor that has completed work on the home.

### **Client Eligibility**

The Grantee is required to utilize a priority point system when providing weatherization assistance to elderly persons, persons with disabilities, families with children, high residential energy users, and households with high energy burden. See CSPM 611 for details.

### **Eligible Dwelling Units**

Structures eligible for weatherization include single-family, manufactured housing (mobile homes), and both large (5+ units) and small multi-family housing (2-4 units). All structures must be stationary and have a specific mailing (street) address. Campers and non-stationary trailers are not eligible. Nontraditional dwelling types such as shelters and mixed use buildings, while allowed, must be approved by BCAEO prior to weatherization to ensure that the dwelling meets program regulations. If deemed necessary, BCAEO will seek approval from DOE for the weatherization of the nontraditional dwelling.

All dwellings to be weatherized must be owner or renter occupied, and occupied by a household that

1. Has income at or below 200 percent of the poverty level established by the U.S. Department of Health and Human Services; or
2. Contains a member who has received any one of the following at any time during the 12-month period preceding the eligibility date:
  - Cash assistance payments under Title IV (FIP), or
  - XVI of the Social Security Act (SSI);
  - Assistance under the Low-Income Home Energy Assistance Act of 1981 (SER)
3. Occupies a qualified rental dwelling unit in accordance with CSPM Item 608;

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4. Occupies a shelter, group home or transitional facility in accordance with CSPM Item 608.1.

Grantees must complete the weatherization of a home within 6 months of conducting the energy audit. Jobs that are not completed within 6 months of the energy audit require an additional, up to date, energy audit to be performed.

### **Rental vs. Owner Occupied Units**

There are no restrictions to the measures installed to any unit based on it being renter or owner occupied. All allowable measures determined via the DOE approved audit are appropriately installed in any eligible unit regardless of the type. See CSPM Item 608.3, Landlord Contributions for policy related to landlord contributions.

If a rental unit is attached to a commercial business (ex. an apartment above a store), the Grantee will submit audit information to the technical monitor for review and approval prior to completing weatherization work.

### **Land Contracts, Life Tenancy, Life Lease Agreements**

When an applicant for WAP services has an executed land contract, life tenancy, or life lease agreement that grants them use of the property that is being considered for weatherization for an extended period, such documentation may be accepted confirmation of "ownership" if the requirements of this section are met. An executed copy of the agreements(s) must be presented to confirm proof of ownership and meet the following conditions.

Income eligible applicants presenting documents meeting of the terms and conditions listed below may be considered owners that are eligible for assistance. In instances where the agreement does not meet the conditions, the applicant should be considered a renter.

The Agreement must meet the following conditions:

- The entire Agreement must be in writing
- It must identify the parties to the agreement (e.g., seller/purchaser, grantor/grantee)
- It must describe the property sufficiently to be able to identify it.
- It must state consideration (e.g., purchase price, "one dollar").
- It must contain all of the terms of the parties' agreement, including who is responsible for maintaining and repairing the property.

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- It must be signed by the parties, their signatures notarized and filed with the county clerk's office in the county where the property is located.
- It must provide the purchaser of life tenant is responsible for payment of all taxes on the property.

#### **Additional Program Requirements**

See CSPM 606.1, 606.2 and 606.3 for more specific program requirements.

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## 606.1 – PROGRAM REQUIREMENTS – WAP AUDITING TOOLS

### REFERENCES

- 10 CFR Part 440, Department of Energy Weatherization Assistance for Low Income Persons Program Regulations
- 10 CFR Part 600, Financial Assistance Rules for Department of Energy
- State of Michigan DOE State Plan
- Department of Energy Weatherization Program Notice 19-4
- WAP Memorandum 035
- DOE Agreement
- Michigan Weatherization Field Guide

### PURPOSE

Grantees are required to use the approved Energy Audit tools and procedures as approved by the DOE on each unit weatherized. A complete audit and inspection are required for each home weatherized.

### POLICY

During PY20, BCAEO received approval from DOE for usage of single family and manufactured home energy audit tools. As part of that submission, DOE approved an Energy Auditor manual, which now must be followed for compliance in the State of Michigan Weatherization Assistance Program. Please see that manual at this [link](#):

Approved audits for the State of Michigan include:

#### National Energy Audit Tool (NEAT)

- Approved by DOE 5/7/2021
- Expires 9/8/2026
- Required for the determination of weatherization measures to be installed for one to four unit dwellings.

#### Manufactured Housing (MHEA)

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- Approved by DOE 5/7/2021
- Expires 9/8/2026
- Required for the determination of weatherization measures to be installed for manufactured (or mobile) homes.

Both NEAT and MHEA are operated through software called Weatherization Assistant. Grantees must use Weatherization Assistant version 8.9. Oak Ridge National Laboratory and DOE have been developing a cloud-based version of Weatherization Assistant (known as WA 10 or WA “in the cloud”). Per WAP Memo 074 and 074A, that software is still being tested and the timeframe of moving to the new software is not spelled out. As part of the rollout of WA 10, BCAEO and MiTEC will deliver trainings to the network before the system is required to be utilized. BCAEO will inform the network when the required timeframes of trainings have been spelled out and also when it is appropriate to begin using the new version of the software.

Only the qualified Energy Auditor who conducted the site visit shall enter data onto the “Inspection” document generated in FACSPRO and into the initial NEAT/MHEA audit. Audits must include completion of all applicable data of the Inspection document. Inspection approval of each installed measure is mandatory for a dwelling to be considered a completion.

Field documentation shall be on a SOM approved field audit and provide all information required to complete NEAT/MHEA data screens. Any attachments containing audit-related additional information shall be referenced on the SOM approved field audit and included as part of the client file.

Data entries required to complete individual audits shall be completed in compliance with the NEAT/MHEA Manual instructions. Weatherization measures with a computed Savings to Investment Ratio (SIR) of 1 or greater as calculated by a NEAT/MHEA audit shall be addressed, unless allowed to be skipped. Measure skipping is generally not allowed in the WAP. For further details on the allowability of Measure Skipping, see the Measure Skipping Clarification section of CSPM 606.3.

### **Weatherization Assistant 8.9 General Setup**

Set up instructions are located at the following web site:

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<https://nascsp.org/wap/waptac/wap-resources/best-practices/home-energy-audits/weatherization-assistant/weatherization-assistant-8-9/>

Grantees shall create and maintain an annual master file, updating the agency's file most recently approved by BCAEO. Identify the file with the agency acronym and the program year as the title.

Grantees shall enter approved work plan fuel cost data in the "Fuel Cost" tab of the NEAT/ MHEA "Set up Library". Grantees must check the costs of fuels in their service area at least once a year and update the costs if necessary. Fuel costs should be typical- avoid high or low short-term values. Grantees may have multiple fuel cost libraries in any given setup library, but each must contain prices for all fuels. Thus, if the Grantee area is served by two different natural gas companies and two different electric companies, in order to account for all possibilities of service from these four companies, you would need four different fuel cost libraries. If the number of service companies in the service area is over 2, Grantees may attempt to average prices for a given fuel from providers whose prices do not differ significantly. The Michigan Public Service Commission provides average pricing for Michigan on their website at [www.michigan.gov/lara](http://www.michigan.gov/lara).

Grantees may, at their discretion, utilize individual client fuel use data collected from the fuel supplier and entered in the "Utility Bills" tab of the "NEAT audit" or "MHEA audit".

The Fuel Escalation Rates and Discount Rate used in the NEAT/HEA setup shall not be altered. Grantees shall use the default values supplied in the NEAT/MHEA program files.

### **Weather Data**

Weather data is determined by the agency when setting up the library. The Grantee shall choose the weather center that is closest to the service area.

### **Material and Labor Costs**

Grantees shall enter their material and labor costs for the allowable NEAT/MHEA measures. Costs shall be separated into the Material and Labor columns respectively.

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### **NEAT Setup**

The NEAT setup shall allow for the consideration of the following Candidate Measures/Weatherization Measures listed below as **ON**; Grantees Shall turn **OFF** the measures marked as **OFF** below:

- |                               |            |
|-------------------------------|------------|
| 1. Attic R-11                 | <b>ON</b>  |
| 2. Attic R-19                 | <b>ON</b>  |
| 3. Attic R-30                 | <b>ON</b>  |
| 4. Attic R-38                 | <b>ON</b>  |
| 5. Attic R-49                 | <b>ON</b>  |
| 6. Filling Ceiling Cavity     | <b>ON</b>  |
| 7. Sillbox insulation         | <b>ON</b>  |
| 8. White roof coating         | <b>OFF</b> |
| 9. Foundation Wall Insulation | <b>ON</b>  |
| 10. Floor R-11                | <b>ON</b>  |
| 11. Floor R-19                | <b>ON</b>  |
| 12. Floor R-30                | <b>ON</b>  |
| 13. Floor R-38                | <b>ON</b>  |
| 14. Wall Insulation           | <b>ON</b>  |
| 15. Kneewall Insulation       | <b>ON</b>  |
| 16. Duct Insulation           | <b>ON</b>  |
| 17. Window sealing            | <b>ON</b>  |
| 18. Door Replacement          | <b>ON</b>  |
| 19. Storm Windows             | <b>ON</b>  |
| 20. Window Replacement        | <b>ON</b>  |
| 21. Low E windows             | <b>ON</b>  |
| 22. Window Shading (awning)   | <b>OFF</b> |
| 23. Sun screen fabric         | <b>OFF</b> |
| 24. Sun screen louvered       | <b>OFF</b> |
| 25. Window film               | <b>OFF</b> |
| 26. Thermal Vent Damper       | <b>OFF</b> |
| 27. Electric Vent Damper      | <b>OFF</b> |
| 28. IID                       | <b>OFF</b> |
| 29. Electric vent damper IID  | <b>ON</b>  |
| 30. Flame retention burner    | <b>OFF</b> |
| 31. Furnace Tune-ups          | <b>ON</b>  |

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- |                                  |            |
|----------------------------------|------------|
| 32. Replace Heating System       | <b>ON</b>  |
| 33. High eff Furnace             | <b>ON</b>  |
| 34. High eff boiler              | <b>ON</b>  |
| 35. Smart Thermostat             | <b>ON</b>  |
| 36. Tune-up AC                   | <b>OFF</b> |
| 37. Replace AC                   | <b>OFF</b> |
| 38. Evaporative cooler           | <b>OFF</b> |
| 39. Install/Replace heatpump     | <b>ON</b>  |
| 40. Lighting Retrofits           | <b>ON</b>  |
| 41. Refrigerator Replacement     | <b>ON</b>  |
| 42. Water Heater Tank insulation | <b>OFF</b> |
| 43. Water Heater Pipe Insulation | <b>OFF</b> |
| 44. Low flow showerheads         | <b>OFF</b> |
| 45. Water Heater Replacement     | <b>ON</b>  |

Ducts outside of the conditioned space must be evaluated for leakage. The Grantee must seal all ducts located outside the conditioned space that have a pressure pan reading above 1 PA.

Faucet Aerators are to be added as a User Defined Measure.

### Key Parameters

The default values contained in the Key Parameters of the “SET UP LIBRARY” shall be utilized with the following exceptions:

- Economics: Minimum Acceptable SIR – 1
- “SETUP Library” “NEAT Insulation Types” tab: Attic - Type 3 F/G Batts Rs/Inch 3.33
- “SETUP Library” “NEAT Insulation Types” tab: Wall - Type 2 F/G Batts Rs/Inch 3.33
- “SETUP Library” “NEAT Insulation Types” tab: Foundation Wall - Type 2 F/G Batts - Value 13
- Any other exceptions shall require written approval from BCAEO

Justification for modification of winter fuel costs and/or weather data must be submitted to the BCAEO for approval as part of the Grantee work plan or prior to implementation if submitted separately from the work plan.



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### **MHEA Setup**

The MHEA setup shall allow for the consideration of the following Candidate Measures/Weatherization Measures listed below as **ON**; Grantees Shall turn **OFF** the measures marked as **OFF** below:

- |   |            |
|---|------------|
| *1. Seal Ducts                              | <b>ON</b>  |
| 2. General Air Sealing                      | <b>ON</b>  |
| 3. Wall Fiberglass batt insl                | <b>ON</b>  |
| 4. Wall Fiberglass batt in Addition         | <b>ON</b>  |
| 5. Wall cellulose loose insl                | <b>OFF</b> |
| 6. Wall cellulose loose insl in Addition    | <b>ON</b>  |
| 7. Wall fiberglass loos insl                | <b>ON</b>  |
| 8. Wall fiberglass loose insl in Addition   | <b>ON</b>  |
| 9. Floor Cellulose loose insl               | <b>OFF</b> |
| 10. Floor cellulose loose insl in Addition  | <b>ON</b>  |
| 11. Floor fiberglass loose insl             | <b>ON</b>  |
| 12. Floor Fiberglass loose insl in Addition | <b>ON</b>  |
| 13. Roof cellulose loose insl               | <b>OFF</b> |
| 14. Roof cellulose loose insl in Addition   | <b>ON</b>  |
| 15. Roof fiberglass loose insl              | <b>ON</b>  |
| 16. Roof fiberglass loose insl in Addition  | <b>ON</b>  |
| 17. Add Skirting                            | <b>OFF</b> |
| 18. Add Skirting on Addition                | <b>OFF</b> |
| 19. White coat roof                         | <b>OFF</b> |
| 20. White coat roof in Addition             | <b>OFF</b> |
| 21. Replace marked doors (mandatory)        | <b>ON</b>  |
| 22. Replace wooden doors                    | <b>OFF</b> |
| 23. Replace wooden doors in Addition        | <b>ON</b>  |
| 24. Storm Doors                             | <b>ON</b>  |
| 25. Storm Doors in Addition                 | <b>ON</b>  |
| 26. Window Sealing                          | <b>ON</b>  |
| 27. Window Sealing in Addition              | <b>ON</b>  |
| 28. Replace single paned windows            | <b>ON</b>  |
| 29. Rpl single pane windows in Addition     | <b>ON</b>  |
| 30. Plastic storm windows                   | <b>ON</b>  |

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31. Plastic storm windows in Addition	<b>ON</b>
32. Glass Storm Windows	<b>ON</b>
33. Glass Storm Windows in Addition	<b>ON</b>
34. Add awnings	<b>OFF</b>
35. Add awnings in addition	<b>OFF</b>
36. Add shade screens	<b>OFF</b>
37. Add shade screens in Addition	<b>OFF</b>
38. Setback Thermostat	<b>ON</b>
39. Tune heating system	<b>ON</b>
40. Evaporative cooling	<b>OFF</b>
41. Tune cooling system	<b>OFF</b>
42. Replace dx cooling equipment	<b>OFF</b>
43. Lighting retrofits	<b>ON</b>
44. Refrigerator replacement	<b>ON</b>
45. Water heater tank insulation	<b>OFF</b>
46. Water heater pipe insulation	<b>OFF</b>
47. Low flow showerheads	<b>OFF</b>
48. Water Heater Replacement	<b>ON</b>
49. Replace Heating System	<b>ON</b>
50. Furnace Filters (User Defined Measure)	<b>OFF</b>

Duct Insulation must be evaluated when ducts are outside of the conditioned space. Ducts must be evaluated for leakage. The Grantee must seal all ducts that have a pressure pan reading above 1 PA.

Faucet Aerators are to be added as a User Defined Measure.

### **Key Parameters**

The default values contained in the Key Parameters shall be utilized with the following exceptions:

- Economics: Minimum Acceptable SIR: 1
- Insulation: bag size for loose fiberglass insulation, as available to agency

### **Weatherization Assistant 8.9 Items to Note**

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## Atmospheric Draft-hood Equipped Furnaces

In the event that an energy auditor is unable to perform proper diagnostic testing, see attached “NEAT / MHEA Steady State Efficiency (SSE) data input” form for guidance. In the instance this is used, the agency must document why a mechanical contractor was not able to perform the testing as required by the Weatherization program.

## Furnace Replacements

In both NEAT and MHEA, furnace replacements that are intended to be an ECM may not be made mandatory and included in SIR. If a furnace is being replaced as an ECM, it will follow the order of installation rules for an ECM (See CSPM 606.3). If it is being replaced through H&S, it may be made mandatory but is not to be included in the SIR.

## Optional Measures

Grantees may install the identified General Heat Waste reduction measures listed below, known as Optional Weatherization Measures, on one to four-unit dwellings, without a need for justification in a site specific energy audit. Optional Measures are intended to be relatively low-cost items that can be quickly and easily installed. Measure costs, including labor, must not exceed \$250.00 total. These measures must provide additional benefit to the client/customer and are not able to be tied to another measure.

An Optional Measure may be skipped for any documented reason (including declined by client). Optional Measures are not prioritized by the energy audit tool and are not turned on inside the audit.

Optional Measures include:

- Water heater tank wrap;
- Water heater pipe insulation; and
- Low-flow showerheads

There are certain items that have been treated as Optional Measures in the past but are no longer considered Optional. They must be addressed in the NEAT/MHEA in the following ways:

- Smart thermostat (Turn ON inside NEAT and MHEA)
- Faucet aerators (Create as a User Defined Measure in NEAT and MHEA)

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- Weatherstripping (Include in air sealing)
- Furnace filters (Include in Health & Safety)

### **Measure Skipping (If Allowable)**

NEAT/MHEA may indicate that a measure shall be addressed, but conditions dictate otherwise. Per WPN 19-4, the only conditions where an Energy Auditor may use this discretion is under funding limitations or with comprehensive documentation, including background/source documents that support the decision. “Major Measures” may never be skipped. See “Measure Skipping Clarification” section in CSPM 606.3 for further detail on this acceptability. In cases where it is allowable for a measure to be skipped,

- If the entry is a price, escalate the measure value to \$9999.00 in “additional costs” (or in MHEA by inserting a “zero” or in some cases “none” in the respective measure screen).
- If the entry is an option of what to consider, choose “none” in the respective measure screen.

Please note, this process is not applicable for furnace replacements.

### **Leveraging Audit Procedure**

Reference DOE WAP Memo 035 for Federal Requirements and CSPM item 622.

- In general, when leveraging funds to reduce the cost of a measure to meet the programs SIR requirement (e.g., furnaces or solar systems), agencies may enter the “discounted” cost for the measure into WA 8.9 (as if they were purchasing the item “on sale”), and document the discounted costs and funding sources in the file.
- In all cases include an explanation indicating the use of leveraged funds on the measure and the amount of leveraged funds used in the Comment field of the WA 8.9/NEAT/MHEA measure.
- This approach is appropriate only in cases where the measure or measures being “discounted” remains the last measure in the package of measures being installed.
- When reconciling the Cost Center in WxPro Module, enter the funding source for the leveraged amount as per policy.

### **Multi-Family Weatherization Audit**

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An independent energy audit shall be conducted on any multifamily building housing five or more units. The independent audit shall have written preapproval by BCAEO Technical staff and the audit must be DOE approved.

Written approval is required prior to the commencement of weatherization services on multi-family units.

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## 606.2 – PROGRAM REQUIREMENTS – TESTING

### REFERENCES

- 10 CFR Part 440, Department of Energy (DOE) Weatherization Assistance for Low Income Persons Program Regulations
- 10 CFR Part 600, Financial Assistance Rules for Department of Energy
- NREL Standard Work Specifications (SWS)
- State of Michigan DOE State Plan
- DOE Program Agreement
- Building Performance Institute, ANSI BSR BPI-1200 current version
- Michigan Weatherization Field Guide

### PURPOSE

The purpose of this policy is to identify and define technical weatherization testing on homes to ensure worker safety and client safety.

### POLICY

All units must have the following tests completed to ensure the safety of the home and to ensure proper weatherization of each home weatherized.

### Required Testing

#### Blower Door

The blower door shall be used at the audit and inspection as a diagnostic tool to measure the air tightness of buildings and to help locate air leakage sites.

The infiltration/exfiltration bypass measures will be considered fulfilled when blower door calculations determine the dwelling is at the minimum air change level for occupant safety conditions, as required by ASHRAE 62.2 2016 or newer.

Each home shall be evaluated for minimum sealing levels based on current occupants and dwelling construction. All dwellings weatherized require blower door testing during energy audit and inspection by a BCAEO approved/certified Energy Auditor, or equivalent (see CSPM 618.1), and a BPI certified Quality Control Inspector. Any final

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inspections performed after July 1, 2015 require the final inspection to be completed by a certified Home Energy Professional Quality Control Inspector.

### **Carbon Monoxide (CO)**

- All dwellings weatherized shall be tested for CO levels during audits and inspections.
- Tests shall include ambient air checks.
- Levels exceeding 9 parts per million (ppm) shall be documented on the SOM approved audit and corrective action recommended.

### **Combustion Appliance**

- All combustion appliances shall be inspected during energy audit by the Energy Auditor and during the Quality Control Inspection by the Quality Control Inspector tested by a licensed mechanical contractor. (Reference BPI-1200 current version standard). Related sections of the SOM approved audit shall be completed. State of MI Mechanical rules and regulations must be adhered to.
- The Combustion Appliance Zone procedure to check for vent stack spillage shall be followed and documented on the SOM approved audit.

### **Worst Case Draft of Combustion Appliance Zone**

Combustion appliances shall be tested under the worst case depressurization of the Combustion Appliance Zone (CAZ). The Worst Case Depressurization of the CAZ testing, when performed, shall be documented on the SOM approved audit.

### **Infrared Scans**

Infrared scans shall be completed by the Energy Auditor and the Quality Control Inspector for all jobs that include any of the following conditions:

- Any dense packing measure (e.g. wall insulation, floor insulation, sloped ceilings)
- Infiltration measures on an attached (or tucked under) garage
- Air sealing (in conjunction with zone pressure diagnostics)

Proof that infrared scans have been completed must be available upon request by BCAEO. Copies of the thermal images from the scans by the Energy Auditor and the Quality Control Inspector can be kept in the agency's client file and be available upon request by BCAEO staff as proof of completion. Alternatively, the grantee can elect to

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provide other certification documentation in the client file that infrared scans were completed by the Energy Auditor and the Quality Control Inspector.

### **Pressure Testing**

Zone pressure diagnostic testing is required for attics and for attached garages. It is encouraged for other areas of the home as a diagnostic tool. Room pressures during air handler operation must be tested. For details on the process of testing room pressures or performing zone pressure diagnostics, refer to the Michigan Weatherization Field Guide.

### **Pressure Pan Testing:**

Pressure pan testing is required in any homes where ducts are outside of the conditioned space, including all manufactured homes. If the pressure pan reading is above 1 PA on any duct outside the conditioned space for site-built or for manufactured housing, sealing must be performed. For details on the process of pressure pan testing, and sealing ducts, refer to the Michigan Weatherization Field Guide.”



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## 606.3 – PROGRAM REQUIREMENTS – TECHNICAL WEATHERIZATION INSTALLATION REQUIREMENTS

### REFERENCES

- 10 CFR Part 440, Department of Energy (DOE) Weatherization Assistance for Low Income Persons Program Regulations
- 10 CFR Part 600, Financial Assistance Rules for Department of Energy
- Weatherization Program Notice 17-7, 19-4
- State of Michigan DOE State Plan
- DOE Program Agreement
- Building Performance Institute, ANSI BSR BPI-1200 current version
- Michigan Weatherization Field Guide

### PURPOSE

The purpose of this policy is to identify and define technical weatherization installation requirements on homes to ensure worker safety and client safety.

### POLICY

All measures installed in the Michigan WAP must meet the following requirements to ensure the safety of the home and to ensure proper weatherization of each home weatherized.

#### Allowable Measures

All weatherization materials utilized in conjunction with work performed as a part of this program shall, at minimum, meet the NREL Standard Work Specifications and the Standards for Weatherization Materials contained in "Appendix A", or variances approved by DOE for the State of Michigan, as published in the 10 CFR 440 and DOE WPN 19-4. In cases where additional requirements apply, the specific requirement(s) will be listed in the appropriate section of this document.

All measures shall be completed so as to successfully perform the intended function on a continuing basis (a quality of product and installation to provide a minimum 10-year life under normal conditions or WA8 lifespan generated SIR).

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Work shall be completed in a manner so as not to detract from the general appearance and structural integrity of the home and shall be in compliance with governing codes, the requirements of this document, and manufacturer's recommendations.

Weatherization measures are for the purpose of rendering the heated portions of dwellings energy efficient and to ensure the safety and protection of such measures, whether new or existing (e.g., any wood or other product which the manufacturer recommends be sealed, that is used to complete weatherization and which is exposed to moisture, shall receive a minimum of prime painting or other recommended sealer). For the purpose of this program, if necessary client usage of areas requires heat to those areas, they shall be treated as heated and weatherized accordingly. Unheated utility rooms, porches, etc., are not eligible for weatherization.

Health and safety measures shall be addressed as required to eliminate hazards as defined in the, the Michigan Weatherization Field Guide, and in accordance with the State of Michigan, U.S. DOE Weatherization Assistance Program State Plan, and state and local codes.

If energy savings cannot be realized under this program due to the condition of a home, these conditions shall be documented in the electronic file (i.e. FACSPRO deferred queue or ineligible queue, whichever is applicable) and the home shall not be weatherized. Such conditions shall be brought to the attention of the client with referrals to other resources, if available.

Measures must be installed properly utilizing the Standard Work Specifications outlined in the Michigan Weatherization Field Guide.

### **Mandatory Health & Safety Measures**

- Installation of smoke detectors
  - Client education on appropriate test procedures and intervals to replace the batteries shall be documented.
- Carbon Monoxide (CO) Alarm/Detector are required to comply with ASHRAE 62.2 version 2016 in all residences. CO Alarms/Detectors must be tested to verify operation of installed alarms.
  - Carbon monoxide alarms shall be installed by the Energy Auditor during the audit on in a dwelling under the following circumstances:
    - Whenever a local agency must defer work and the dwelling unit contains an unsafe combustion appliance

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- A combustion appliance is emitting unsafe levels of CO that cannot be immediately remedied
- A combustion appliance has minimal draft and/or spillage and no CO is being produced
- The dwelling contains a fireplace or wood burning stove that draws combustion air from inside the dwelling.
- Implementation of program required ASHRAE 62.2 ventilation standard is required.
- Clothes dryers shall be vented to the exterior.

### **Installation of Energy Conservation Measures**

Energy Conservation Measures (ECMs) must be installed in the order of decreasing Savings to Investment Ratio (SIR), starting with the highest and ending with the with the lowest SIR of 1.0 or greater. “Measure skipping” is defined as follows: Not installing, in order of decreasing SIR, the cost-justified ECMs and related Incidental Repairs Measures (IRM) included in the work scope produced by the Department of Energy (DOE) approved energy audit tool (NEAT/MHEA). Measure skipping is generally not allowed in the WAP. For further details on Measure Skipping, see Measure Skipping Clarification section of this CSPM.

### **LED Bulbs**

LED Bulbs shall be used to replace existing incandescent light bulbs only. Annual energy savings will be based on a three hour usage per day.

- LED bulbs must be omni-directional
- LED bulbs must be soft- or warm-white to provide the hue similar to incandescent bulbs (unless client requests brighter light)
- All LED bulbs installed must be ENERGY STAR® (version 2.0) rated
- LED bulbs installed in a dimmable socket must be designed to work with traditional dimmer switches
- LED bulbs installed in an enclosed housing must be approved for recessed or enclosed spaces

LED bulbs will be installed with client permission in each house.

LED bulbs must be installed where instructed in work order. Weatherization workers may not leave the bulbs with the client to install.

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### Order of Measure Installation

Measures installation shall be completed in the following sequence:

1. Health and Safety measures to correct hazards identified on the audit that directly affect the health and safety of occupants (WAP staff and workers included).
2. Air sealing.
3. Insulation measures.
4. Remaining audit measures in order of decreasing SIR.

### Measure Skipping Clarification

- **Measure Skipping**  
“Measure skipping” is defined as follows: Not installing, in order of decreasing Savings to Investment Ratio (SIR), the cost-justified Energy Conservation Measures (ECMs) and related Incidental Repairs Measures (IRM) included in the work scope produced by the Department of Energy (DOE) approved energy audit tool (NEAT/MHEA).
- **Major Measure**  
“Major Measure” is defined as follows: A high priority measure, which if skipped, would result in “partial” weatherization of a unit. Major measures are as follows: air sealing, duct sealing of ducts outside the thermal boundary, attic insulation, wall insulation and floor or belly insulation.
- **Measure Skipping of cost-justified major measures is not permitted at any time.**
- **Alteration of the cost-justified work order must be addressed in the following ways for the following situations:**
  - **Funding Limitations:**  
If all funds available to be spent on the job will not cover the entire work scope, then measures may be removed from the work order starting with the lowest SIR measure and working up the list from there. The work order must remain overall cost-effective or the job must be deferred. Necessary Health and Safety (H&S) measures may NOT be removed from the work order; however, ECMs can be removed.
  - **Prior to work beginning:**

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- **Client education** is important to inform a client of planned measures and material use. Resistance from a client to install any measures and/or materials planned as a result of NEAT/MHEA created work order should be addressed with either additional education and/or re-running the energy audit with a different - but acceptable - material to determine if the substitute material is cost effective. If no cost-effective option for the material can be identified, the auditor should again explain and discuss the situation with the building owner or occupant.
- **If the building owner or occupant still declines a measure, not defined as a major measure**, the auditor must include in the client file a comprehensive justification, including background/source documents that support the decision to skip a specific measure. All other weatherization measures must be installed.
- **If the auditor cannot access background/source documents that justifies the building owner/occupant's decision to decline a measure or the measure is defined as a "major measure"**, the situation must be fully documented in the client file and the job must be deferred due to client refusal.
- **Inadequate training:**  
A lack of training for Grantees is not an allowable reason to skip measures. Standard procedure should be to postpone job(s) requiring priority measures that cannot be installed due to lack of trained staff until adequate training is acquired.
- **After a job has begun:**  
Due to scheduling, measures are sometimes installed with a lower priority first. If during the installation process, the client declines a higher priority measure, work must stop at the time the client declined the higher priority measure. No further installation is allowed and the job must be inspected by a Quality Control Inspector (QCI) and closed out as a completed unit. This should be clearly explained in client file documentation. Some agencies include a statement for client signature that states the client is aware and accepts all WAP rules, including the specific services and measures determined by an energy audit.

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- **Optional Measures**  
The Optional Measures may be skipped for any documented reason (including declined by client). Optional measures are not prioritized by the energy audit tool. The Optional Measures are listed in the “Optional Measures” section of CSPM 606.1.

### **Fuel Switching**

The Weatherization Assistance Program (WAP) does not permit the general practice of non-renewable fuel switching when replacing furnaces/appliances. However, DOE does allow the changing or converting of a furnace/appliance using one fuel source to another on a limited, case-by-case basis. These approvals will only be granted when all related costs demonstrate the effectiveness of the fuel switch over the life of the measure.

BCAEO reviews and approves the case-by-case fuel switch requests. Grantees must submit each request to [MDHHS-BCAEO@Michigan.gov](mailto:MDHHS-BCAEO@Michigan.gov) with required submission support and BCAEO will review the submitted information and determine the approval. See CSPM 610 for details on fuel switch submissions to BCAEO.

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## 606.4 – PROGRAM REQUIREMENTS – FIELD GUIDE UPDATES

### REFERENCES

- 10 CFR Part 440, Department of Energy (DOE) Weatherization Assistance for Low Income Persons Program Regulations
- 10 CFR Part 600, Financial Assistance Rules for Department of Energy
- State of Michigan DOE State Plan
- DOE Program Agreement
- Building Performance Institute, ANSI BSR BPI-1200 current version
- Michigan Weatherization Field Guide
- Standard Work Specifications (SWS)

### PURPOSE

The Michigan Weatherization Field Guide was approved on May 26, 2021. The Field Guide is valid until September 8, 2026. The purpose of this policy is to identify any updates that need to be made in the Field Guide that will be anticipated in the next version. Edits identified in this CSPM supersede language in the published Michigan Weatherization Field Guide.

### POLICY

All measures installed in the Michigan WAP must meet the NREL SWS or variances approved by DOE for the State of Michigan. These SWS and variances are outlined in the Michigan Weatherization Field Guide. After the Michigan Weatherization Field Guide's approval, some items may be identified as not matching the SWS or variances for the State of Michigan. Adjustments to Field Guide items will be identified in this document and will be anticipated updates for the next published version of the Michigan Weatherization Field Guide.

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## REFERENCES

- U. S. Department of Energy (DOE) Weatherization Program Notice (WPN) 19-5
- U.S Department of Energy (DOE) Weatherization Program Notice (WPN) 19-4 (including Attachments)
- Michigan Weatherization Field Guide
- 10 CFR 440.3

## PURPOSE

DOE has identified inconsistencies in State and agency interpretation of DOE policy concerning the classification of an Incidental Repair Measure (IRM). The following statutory provisions and regulations apply to IRMs, including roof repairs and window or door repair and replacements:

- Per 42 U.S.C. § 6861(b) the weatherization program's purpose is "...to increase the energy efficiency of dwellings owned or occupied by low-income persons, reduce their total residential energy expenditures, and improve their health and safety..."
- 10 CFR 440.3 defines Incidental Repairs as "...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 weatherstripped and providing protective materials, such as paint, used to seal materials installed under this program." 10 CFR 440.21(d) states further that "[e]xcept for materials to eliminate health and safety hazards allowable under §440.18(c)(15), each individual weatherization material and package of weatherization materials installed in an eligible dwelling unit must be cost-effective...[and] must result in energy cost savings over the lifetime of the measure(s)..."

Grantees and Subgrantees are reminded that the WAP is not a rehabilitation or general repairs program. This guidance strictly prohibits stand-alone roof replacements, structural repairs, or other non-energy related rehabilitation work. Units requiring this type of repair should be referred to a rehabilitation program or the Subgrantee must use other sources of funding to cover these costs. The IRM category is reserved for repairs that are not part of an Energy Conservation Measure (ECM), but are necessary to protect a newly installed ECM.

## POLICY



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**Incidental repairs must be justified by written and photo documentation in the client file.**

An Incidental Repair Measure (IRM) is defined as a repair necessary for the effective performance or preservation of newly installed weatherization materials, but not part of a standard installation. IRM installations must be associated with a specific Energy Conservation Measure (ECM) or group of ECMs. IRMs must be justified by written and photo documentation in the client file. IRM costs must be included the SIR calculation of the total package of weatherization measures. The total costs of all IRMs is added to the cost of the package of weatherization measures to calculate the whole unit SIR (CSIR).

The primary goal of the Weatherization Assistance Program is “...to increase the energy efficiency of dwellings owned or occupied by low-income persons...” IRMs must be limited to those minor repairs necessary for effective performance or preservation of energy conservation measures installed by the Subgrantee. WAP funds shall not be used to install IRMs solely to protect existing materials in the dwelling.

DOE policy relating to the inclusion of IRMs in the package of weatherization measures is summarized as follows:

- Justification for the cost of each IRM and why it is necessary for the effective performance or preservation of an ECM must be documented in the client file with photos and written explanation.
- The total cost of the package of weatherization measures including any IRMs must have a calculated SIR of 1.0 or greater.

For questions related to instances where necessary IRMs bring the SIR of the total package of measures below 1.0, or issues related to “measure skipping” see the most recent Guidance on the topic (CSPM 606.3).

IRMs must be input into Weatherization Assistant as an itemized cost in the following format:

*IR – IR description – Related ECM description*

After the first audit run, a package of measures may not have a qualifying SIR. It would be necessary to remove the combination of the ECM and its related IRM with the lowest SIR. If the IRM was deemed necessary for effective performance of the ECM, then both the ECM and the IRM must be removed in the attempt to meet the dwelling SIR. This process (removing the lowest ECM and its associated IRM) would continue until the package of measures (and each ECM) has a qualifying SIR.

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If one IRM is necessary to protect or enhance more than one ECM, (e.g. roof repair protecting attic insulation, sidewall insulation, and foundation insulation; and the Grantee plan designates roof repair as an incidental repair) then all of those ECMs together must be considered for removal until the SIR for the package of measures is 1.0 or greater. This process may result in deferral of the weatherization work until another funding source can be found to pay for the IRM(s).

IRMs must be limited to those minor repairs necessary for effective performance or preservation of measures installed by the Sub grantee. WAP funds cannot be used to install IRMs deemed necessary to protect materials in the building before the WAP audit is performed.

See section 4.0 of the Health & Safety Plan for details on Health & Safety related items that will be installed as Incidental Repair Measures under certain circumstances.

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## 608 – RENTAL UNIT AND MULTIFAMILY WEATHERIZATION

### REFERENCES

- 10 CFR Part 440, Weatherization Assistance Program (WAP) for Low-Income Persons
- Weatherization Program Notice 16-5, 16-6, 17-4, 21-1
- WAP Memo 016 & 035
- DOE Multifamily Units Frequently Asked Questions
- DOE Rental Units Frequently Asked Questions

### PURPOSE

To provide Grantees with guidance on weatherizing rental units and multifamily buildings in the Weatherization Assistance Program (WAP). This guidance covers prioritizing weatherization work based on housing type, multifamily building eligibility, average cost per unit in multifamily dwellings, property listings for use in the WAP, and required documentation.

10 CFR Part 440.22(b)(3), states that a Grantee may weatherize a building containing rental dwelling units....where:

- (i) The benefits of weatherization assistance in connection with such rental units, including units where the tenants pay for their energy through their rent, will accrue primarily to the low-income tenants residing in such units;
- (ii) For a reasonable period of time after weatherization work has been completed on a dwelling containing a unit occupied by an eligible household, the tenants in that unit (including households paying for their energy through their rent) will not be subjected to rent increases unless those increases are demonstrably related to matters other than the weatherization work performed;
- (iii) The enforcement of paragraph (b)(3)(ii) of this section is provided through procedures established by the State by which tenants may file complaints, and owners, in response to such complaints, shall demonstrate that the rent increase concerned is related to matters other than the weatherization work performed; and
- (iv) No undue or excessive enhancement shall occur to the value of the dwelling units.

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## POLICY:

### Prioritizing Weatherization Work

The purpose of WAP is to ensure weatherization services are being provided to low-income persons that live in all types of housing (i.e. single family, manufactured housing units, and multifamily buildings). Additionally, 10 CFR 440.1 states WAP shall increase energy efficiency of dwellings owned or occupied by low income persons... especially low income persons who are particularly vulnerable such as the elderly, persons with disabilities, families with children, high residential energy users, and households with high energy burden.

Grantees are reminded that weatherization is designed to take place with a whole *building as a system* approach (10 CFR 440.22(b)). A single unit within a multi-unit building is not categorically excluded, but due to the rare instances when this is allowable, requires BCAEO and DOE Project Officer (PO) prior approval.

Since Michigan does not currently have an approved multifamily energy audit tool, all multifamily projects (5+ single family units) may not proceed without prior BCAEO or DOE approval. If an agency is interested in conducting a multifamily project, contact the BCAEO Weatherization Specialist.

Grantees may complete up to 20% of their annual agency production as multifamily units. If a Grantee seeks to exceed 20% of their annual production from multifamily units, they must request a waiver by emailing [MDHHS-BCAEO@michigan.gov](mailto:MDHHS-BCAEO@michigan.gov) with the request and justification. The agency may not proceed on multifamily projects exceeding 20% of their annual production before the waiver is approved.

### Multifamily Building Eligibility

10 CFR Part 440.22(b)(2), states that a Grantee may weatherize a building containing rental dwelling units where not less than 66 percent (50 percent for duplexes and four-unit buildings) of the dwelling units in the building:

- (i) Are eligible dwelling units, or
- (ii) Will become eligible dwelling units within 180 days under a Federal, State, or local government program for rehabilitating the building or making similar improvements to the building.

The initial expectation is that Grantees will target buildings with five or more units wherein 66 -100 percent of the occupants meet the income eligibility requirements. However, there are certain buildings where 50 percent eligibility is more appropriate threshold. DOE indicated that certain eligible types of large multifamily buildings are those buildings for which and investment of DOE funds would result in significant energy efficiency improvement because

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of the upgrades to equipment, energy systems, common space, or the building shell. Utilizing the 50% rule requires BCAEO approval and DOE approval.

All units in the building **MUST** be similarly served and all units separately reported to DOE.

All units, whether having income eligible occupants or not, must be weatherized, along with common areas, and tenants (eligible or not, having applied or not) cannot opt out of audit determined energy savings measures.

### **Vacant Units**

If the whole building qualifies for WAP, the vacant units should receive WAP services per the energy audit. The unit may also be counted as eligible if it will become income-eligible within 180 days under a Federal, State or local government program for rehabilitating the building or making similar improvements to the building (CFR 440.22(b)(2)(ii)). In the event a vacant unit is counted as an eligible unit but is then occupied by an ineligible family, the project becomes disallowed if the minimum eligibility requirements for the building as a whole, set forth in 10 CFR 440.22, are not met.

### **Multi-Unit Restrictions**

If a multi-unit building is not determined eligible, no single unit may be weatherized.

Example: In a ten unit building there are four eligible units and six ineligible units. Weatherization cannot be performed in any of the ten units.

### **Multi-unit Buildings as identified by the Department of Housing and Urban Development (HUD), the Department of Agriculture (USDA) and Low Income Housing Tax Credit (LIHTC):**

Beginning in calendar year 2017, HUD will no longer be updating the online lists (as in previous years), therefore, WAP will no longer use them. HUD will qualify multifamily buildings on a case-by-case basis, as requested. Grantees wishing to qualify a building should make the request through their BCAEO Grant Manager to begin the process of qualifying a building through DOE and HUD.

The rule expressly indicates that income qualified public housing, assisted housing, LIHTC properties, and properties with USDA guaranteed loans may be eligible recipients of WAP funds. The rule does **not**, however, **require** the State of Michigan or Grantees to set aside funds for these properties. If a Grantee has interest in pursuing utilizing WAP funds for these type of Weatherization projects, contact the BCAEO Grant Manager to determine a process. The certification procedures outlined in this Guidance do not apply to LIHTC properties, or for properties with USDA guaranteed loans. The LIHTC and USDA lists of income-eligible properties are no longer valid and will no longer be updated; WAP providers should follow

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standard procedures for verifying individual resident incomes for USDA and LIHTC properties.

To ensure that a multifamily building meets the income eligibility requirements set by DOE pursuant to the certification process established by HUD, property owners and managers shall submit two documents to HUD: 1) a **Property Self-Certification Form** that specifies that the building in question meets DOE's income eligibility requirements and, 2) a **Property Occupancy Report** from current property records that confirm compliance with DOE's income eligibility requirements.

### Property Certification Procedure

#### 1. Property Self-Certification Form

The property owner or authorized agent of the property must sign a Self-Certification format testing that:

- The property owner or authorized agent maintains certified income records for households residing at the property.
- The property owner or authorized agent has reviewed its current certified income records.
- The property owner or authorized agent has determined that at least 66 percent of the units in each building (or at least 50 percent of the units for 2- and 4-unit buildings) have certified incomes that are at or below 200 percent of the current federal poverty level based on household size.
- The property owner or authorized agent certifies that all the information provided with the certification request is true and accurate.

A multifamily property certification form is attached for use by property owners or authorized agents.

#### 2. Property Occupancy Report

The property owner or authorized agent must also complete and submit an Occupancy Report for the property.

A **Multifamily Occupancy Report** worksheet file is attached to this CSPM for completion by property owners or authorized agents. The file contains a Property Information worksheet and Building-Unit worksheets that must be completed for each building. The income information requested should be available from standard occupancy reports prepared for the property.

Required property information includes: property name, HUD contract number, contract expiration date, other property identification number (if applicable), property address and the number of buildings and units that are at the property and that meet DOE's income requirements.

Required building-unit information includes a listing of all units and information for each unit including: building identification, building address, certified annual income, household size, and whether the household income was certified in the last year.

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Upon completion of the Property Certification and the Multifamily Occupancy Report, the property owner (or property owner's representative) will submit both files to BCAEO. BCAEO will in turn submit the files to HUD and DOE.

### 3. HUD Review

- HUD will review the certification and accompanying documentation for completeness. If the documentation submitted by the property owner is insufficient for HUD to complete its review, HUD will notify the property owner via e-mail that the request cannot be approved based on the information submitted.
- HUD will review the household and property information provided under the self-certification process with records maintained by HUD, and may request additional occupancy information subject to Federal requirements.
- If the documentation is complete and one or more of the buildings at the property meet DOE's income eligibility requirements, HUD will designate the property or list of qualified buildings as income qualified properties/buildings, and will notify DOE and the building owner.
- HUD will at the same time provide DOE with a list of the income-certified buildings pursuant to the above procedures; DOE will post these lists on its web site as required by 10 CFR 440.22(b)(1), 440.22(b)(2), and 440.22(b)(4).
- Buildings determined by HUD to be eligible for WAP assistance will be posted on one of two lists:
  - List 1 –Public housing buildings or privately-owned buildings with three or more years remaining on their affordability contracts with HUD are included on this list. As outlined in the January 2010 Final Rule, inclusion on List 1 demonstrates compliance with the following three WAP multifamily program requirements: (1) DOE's income requirements; (2) protection against rent increases; and (3) protection against undue enhancement of the weatherized building.
  - List 2 –Buildings on this list have less than three years remaining on their Housing Assistance Payments (HAP) contract with HUD. As outlined in the January 2010 Final Rule, inclusion on List 2 demonstrates compliance with only the following two multifamily program requirements: (1) DOE's income requirements; and (2) protection against undue enhancement of the weatherized building. Buildings on this list must separately comply with the WAP program requirement for protection against rent increases.

### Rehabbed Multi-Unit Buildings

Weatherization funds may be used to weatherize a dwelling being rehabbed such as Habitat for Humanity rehabs or MHSDA rehabs (cannot be used on new construction) if the dwelling fits the following:

1. The households have been determined eligible; and

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2. The subgrantee is meeting or exceeding all the goals for elderly, disabled (or the household falls into one of these categories); and
3. The waiting list of eligible applicants is followed based on the priorities established by the subgrantee. These units cannot be given a priority just because they are a part of a rehab program.

### Multi-Unit Restrictions

If a multi-unit building is not determined eligible, no single unit may be weatherized.

Example: In a 10-unit building there are four eligible units and six ineligible units weatherization cannot be performed in any of the ten units.

Any potential multi-unit projects will be presented to the DOE Project Officer for approval.

### Documentation Requirements

Table 1: Documentation Requirements

Documentation	Required?
Building Owner Permission	Yes
Income Eligibility Documentation	Yes (if on HUD list, follow the Property Certification Procedure process outlined above)
Demographics of Residents	Yes
Accrual of Benefits to Tenants <sup>1</sup>	Yes, if applicable
Audit Runs	Yes
Leverage/Buy-Down Agreements	Yes, if applicable

<sup>1</sup>If tenants are not billed directly for energy costs. Grantee documents how benefits accrue to residents.

#### *Building Owner Permission*

As required in 10.CFR 440.22(b)(1), the Grantee is required to obtain the written permission of the owner of the building or his agent. The subgrantee will ensure a landlord agreement is completed for each building containing a rental dwelling unit to be weatherized, prior to the weatherization of any rental unit. A copy and explanation of all relevant agreements must be signed by the tenant receiving weatherization services upon the agreements' completion.

#### *Income Eligibility*

Except in cases when HUD approval has been granted, the Grantee must collect income



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information on a unit-by-unit basis to ensure at least 66% (or 50% for identified housing) of the occupants in five or more unit building are eligible for service.

For units in a building(s) approved/qualified by HUD, follow the Property Certification Procedure process outlined above.

#### All Other Units

For multi-unit buildings that do not fall under the two categories above, individual applications, and income eligibility verifications must be obtained for each unit. This information must be included in all client files. See CSPM Item 601 for Income Eligibility Guidelines. See CSPM Item 612 for client file requirements.

#### *Demographics*

Grantees must have procedures in place to ensure that priority is given to identify and provide weatherization assistance to: elderly persons, persons with disabilities, families with children, high residential users, and household with high energy burden. See CSPM 611 for guidance on client priority selection criteria. Grantees must obtain, verify, and maintain, as required the proper documentation on demographics for the properties to be weatherized.

Grantees must collect the defined demographics reported to BCAEO and to DOE.

Generally, resident demographics must be reported on a unit-by-unit basis. However, in some cases, buildings with HUD approval may collect rent rolls or other such building owner records provided on an entire building or project basis may be sufficient documentation to meet this requirement. This will be determined when the request is made by the Grantee. Grantees are urged to initiate a landlord/tenant agreement to capture elements required by the regulations (e.g., benefits accrue to the tenants, tenants are not subjected to rent increases due to property improvements provided by WAP, what occurs if tenants are evicted or the building sold before a specific period of time has passed). This agreement should correspond to the type of subsidy the building receives.

#### *Benefit Accrual to the Tenant*

Instances in which a tenant does not pay for energy directly, Grantees must ensure the weatherization benefits accrue to the low-income tenant.

Any request for weatherization of eligible multi-unit buildings needs to demonstrate in sufficient detail to the Grantee that the benefits of weatherization work accrue primarily to the low-income tenants.

To ensure this, Grantees have the option of:

- Requiring a landlord agreement for a minimum period of two years, or

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- Developing an agency policy describing a combination of several categories of benefits that can be used to demonstrate that the benefits of the weatherization accrue primarily to the tenant.
- Benefits that could be combined, include, but are not limited to:
  - Longer term preservation of the property as affordable housing;
  - Continuation of protection against rent increases beyond that required under the WAP regulations (10 CFR 440.22(b)(3)(ii);
  - Investment of the energy savings in facilities or services that offer measurable direct benefits to tenants;
  - Investment of the energy savings from the weatherization work in specific health and safety improvements with measureable benefits to tenants;
  - Improvements to ventilation and to heat and hot water distribution to improve the comfort of residents; and
  - Establishment of a shared savings program

Generic assertions such as “tenant services will be improved” or “weatherization will improve health and safety” are **not** sufficient to demonstrate that the accrual of benefits requirement is met.

Grantee’s wishing to use their own policy must submit the draft policy to the Bureau for approval prior to implementation. Draft policy review requests should be emailed to: [MDHHS-BCAEO@michigan.gov](mailto:MDHHS-BCAEO@michigan.gov) with a copy to the DHHS-BCAEO grant manager.

The table below is an “at-a-glance” to convey which potential benefits are valid for different utility payment arrangements.

Table 2: Accrual of Benefits

Potential Benefit	Tenant Pays Utilities	Utilities included in Rent
Lower energy bills when seasonal temperatures are consistent with historic temperatures	Yes	No
“Lower than expected” energy bills in the event of hotter/colder weather than previous years	Yes	No
Longer term preservation of the property as affordable housing	Yes	Yes
Continuation of protection against rent increases beyond that required under the WAP regulations (10 CFR 440.22(b)(3)(ii))	Yes	Yes
Investment of the energy savings in	Maybe- requires	Yes

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facilities or services that offer measureable direct benefits to tenants	description	
Investment of the energy savings from the weatherization work in specific health and safety improvements with measureable benefits to tenants	Maybe- requires description	Yes
Additional improvements, not related to weatherization, to heat and hot water distribution, and ventilation, to improve the comfort of residents	Yes	Yes
Establishment of shared savings program	Maybe- requires description	Yes

#### *Audit Runs*

Michigan does not currently have an approved energy audit for multifamily weatherization. Multifamily projects will be conducted on a case-by-case approval basis and at that time, the appropriate energy audit tool will be agreed upon. In multifamily weatherization, the WAP file for each building should contain at least the following information from the energy audit:

- The recommended statement of work including the savings to investment ratios (SIRs) of each measures and the total project SIR.
  - If any measures were bought down or otherwise leveraged the documentation must show the pre-leveraged SIRs of each individual measure and the pre-leveraged project SIR.
  - Documentation must include the other sources that funded each bought-down measure.
- Either a printed file showing all of the building audit inputs and outputs or the immediately accessible electronic file that shows all audit inputs and outputs.
- Final installed costs of each measure and the total project costs. If the project went through the bidding process then all bid prices- winning and losing bids- must be in the file.
- All specifications defining each measure.

#### *Leverage/Buy-Down Agreements*

Grantees are strongly encouraged to be innovative in attracting other resources into the WAP. The ultimate goal is to increase the number of low income households that can be served and/or permit additional cost-effective measures to be installed in each dwelling unit.

Many WAP Programs use a combination of **federal funds** (e.g., WAP funds, Low- Income Home Energy Assistance Program (LIHEAP) funds, and Community Development Block Grant Program (CDBG)) and **non-federal funds** (e.g., utility investments from systems benefit charges or efficiency programs, state funds from special set-asides, other rehabilitation funds,

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private funds from landlord contributions or foundations, and other private sources) to accomplish the scope of work on a building.

Regardless of the funding source, only measures on a list of measures with a cumulative SIR of 1 or greater may be paid for in any portion with WAP funds.

In addition, landlords may contribute to the weatherization of their buildings (for detailed information on landlord contributions, see CSPM 608.3). There are two mechanisms for landlord contributions: participation agreements that address broad Grantee requirements and specific measure buy-downs. Grantees may establish and require participation agreements. They may allow buy-downs in multifamily (including 2-4 unit) weatherization. Funding sources other than landlord contributions may also be used for buy-downs. Buy downs are only allowable in multifamily weatherization; but, leveraging funds may be done in both single family and multifamily weatherization. For further information on buy downs and leveraging, see CSPM 622.

At Grantee discretion, building owners may also buy down measures *they* typically prioritize as needs – like furnace or boiler replacements or new fenestration – that do save energy but don't achieve an individual SIR of 1 or greater as a stand-alone measure. This must be approved by BCAEO. However, in order for the measures to qualify for the buy down, the package of measures, including the full cost (the pre-buy down cost) of the measure which is to be bought down, must have an SIR of 1 or greater.

Note: All associated health & safety costs incurred on a dwelling unit are generally treated outside the SIR when determining cost-effectiveness. However, all energy related incidental repair measures associated with weatherizing the dwelling units are a part of the SIR when determining costs.

Grantees have some flexibility in calculating the SIR for a specific measure when other funds can be used to offset some of the costs, thereby reducing the DOE investment on the remaining investment. It is not DOE's intent, however, to participate in projects that do not demonstrate overall cost effectiveness in design and installation.

All Grantees will use this SIR calculation allowance only when the cost effectiveness for the entire investment in the property can still be substantiated. In other words, a measure can be bought down only when the overall CSIR of the job, including the full cost of the measure that would be bought down is 1.0 or greater.

**Example:** In order for a measure to qualify for the buy-down, the package of measures, including the full cost (the pre-buy-down cost) of the measure which is to be bought down, must have a CSIR  $\geq 1.0$ .

In the first case below the replacement windows would be eligible for a

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buy-down in WAP; the replacement windows with a full-cost measure SIR = 0.8 could be bought down so the after-buy-down DOE *measure* cost would have an SIR of at least 1.0, and the CSIR would be greater than or equal to 1.0 when including the pre-buy-down cost of the measure (and of course the post-buy-down DOE package CSIR would increase as well).

In the second case the replacement windows would not be eligible for a buy-down in WAP because the pre-buy-down *package* CSIR is below 1.0.

Energy Saving Economics Case 1 – Buy-down Allowed in WAP		
Measure	Measure SIR	Cumulative SIR
Infiltration Reduction	1.3	1.3
Lighting Retrofits	7.4	1.7
Ceiling Insulation	2.4	1.9
Replacement Windows (pre-buy-down)	0.8	1.1 ( $\geq 1.0$ )

Energy Saving Economics Case 2 – Buy-down Not Allowed in WAP		
Measure	Measure SIR	Cumulative SIR
Infiltration Reduction	1.3	1.3
Lighting Retrofits	7.4	1.7
Ceiling Insulation	2.4	1.9
Replacement Windows (pre-buy-down)	0.6	0.9 ( <b>not <math>\geq 1.0</math></b> )

Further, it is not DOE's intent to "leapfrog" measures that are already cost-effective in order to accommodate a measure that is included in the package of measures as a result of using the provisions of this guidance. All measures that were cost-effective after the initial energy audit is conducted would remain a part of the list of measures to be completed on the building. Measures that did not attain the SIR of 1.0 can only be considered for buy down if all the cost-effective measures in the initial audit are also installed.

The following steps are recommended in order to determine what other funding is necessary to leverage for a measure that would otherwise not meet WAP SIR requirements:

1. It is expected that Grantees will use this SIR calculation allowance of the building to determine the package of measures that a combined SIR of 1.0 or greater, including measures that are not cost-effective without leveraged resources.
2. Determine whether sufficient funds from other resources are available to bring any measures with individual SIRs below 1.0 in that package up to at least an SIR of 1.0.
3. Apply those other funds to that measure and include it in the package of measures.

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4. Document the inclusion of the leveraged measure into the weatherization statement of work with the original energy audit and either
  - a. A summary of all costs associated with the weatherization of the building, including any or all resources to be used, or
  - b. A revised audit in which the leveraged price of the additional measure is used as the measure cost. This documentation will be part of the building's customer file along with the inputs and results of both energy audits.

For Frequently Asked Questions regarding DOE's position on issues and questions related to Multiunit Weatherization and Rental Unit Weatherization visit the following websites:

DOE Multifamily Weatherization Frequently Asked Questions:

[http://www.waptac.org/data/files/Website\\_docs/Government/Guidance/2016/WPN-Multifamily-FAQs-050516.pdf](http://www.waptac.org/data/files/Website_docs/Government/Guidance/2016/WPN-Multifamily-FAQs-050516.pdf)

DOE Rental Units Frequently Asked Questions:

[http://www.waptac.org/data/files/Website\\_docs/Government/Guidance/2016/WPN-Rental-Units-FAQs-050516.pdf](http://www.waptac.org/data/files/Website_docs/Government/Guidance/2016/WPN-Rental-Units-FAQs-050516.pdf)

See CSPM 622 for further information on buy downs and leveraging.

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## 608.1 – SHELTERS, GROUP HOMES AND TRANSITIONAL LIVING FACILITIES

### REFERENCES

10 CFR Part 440, Department of Energy Weatherization Assistance Program (WAP) for Low Income Persons

Department of Energy Weatherization Program Notice (WPN) 16-5

### PURPOSE

10 CFR Part 440.22(b)(2), states that a subgrantee may weatherize a shelter, group homes, and transitional facilities.

DOE WPN 16-5 provides guidance regarding accrual of benefits to low-income tenants in multi-unit buildings under WAP.

### DEFINITIONS

A *shelter* is a dwelling unit or units whose principal purpose is to house on a temporary basis individuals who may or may not be related to one another and who are not living in nursing homes, prisons, or similar institutional care facilities.

A *group home* is a single unit in which three or more people, not related by blood or marriage, reside and share eating facilities. In addition, a group home must have a clearly definable identity which distinguishes it from more informal, family-type settings. A group home may be either a temporary or a permanent residence.

### POLICY

The Grantee may weatherize a shelter, group home or similar facility for long- or short-term residents, provided the owner or organization and residents of the dwelling units meet prescribed building and income eligibility requirements. Prior, written approval by the MDHHS BCAEO staff is required for the weatherization of any shelter, group home or transitional facility. The documentation materials included below should be submitted to

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the MDHHS-BCAEO email for review and approval. Include in the subject line: “*Shelter, Group Home, Transitional Living facility application approval request*”

### DOCUMENTATION

Grantees will document individual resident income verification unless there is such a high rate of turnover among residents that documentation of individual resident eligibility is impractical.

When documentation of individual resident income eligibility is impractical, operators of eligible facilities must complete the *Weatherization Assistance Program Application for Shelters, Group Homes and Transitional Facilities, DHS-4284*, with the following supporting documentation:

1. A signed statement from the facility operator attesting that the individuals/households residing in the facility are income eligible.
2. A copy of the organization’s income guidelines or a copy of the organization’s mission statement in lieu of individual resident income verification.
3. Documentation that the facility is a non-profit organization.
4. Proof of benefit accrual to the low-income tenant(s).

### **Unit Count**

For the purpose of determining how many dwelling units exist in a shelter, the grantee may count one of the following as a dwelling unit:

- a. Each 800 square feet
- b. Each floor

### **Benefit Accrual to the Tenant**

In instances in which a tenant does not pay for energy directly, the grantee must ensure the weatherization benefits accrue to the low-income tenant. To ensure this, the grantee has the option of:

- Requiring a landlord agreement for a minimum period of five years, or



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- Developing an agency policy describing a combination of several categories of benefits that can be used to demonstrate that the benefits of the weatherization accrue primarily to the tenant.

Benefits that could be combined, include, but are not limited to:

- Longer term preservation of the property as affordable housing;
- Continuation of protection against rent increases beyond that required under the WAP regulations (10 CFR 440.22(b)(3)(ii);
- Investment of the energy savings in facilities or services that offer measurable direct benefits to tenants;
- Investment of the energy savings from the weatherization work in specific health and safety improvements with measurable benefits to tenants;
- Improvements to ventilation and to heat and hot water distribution to improve the comfort of residents; and
- Establishment of a shared savings program.

Generic assertions such as “tenant services will be improved” or “weatherization will improve health and safety” are **not** sufficient to demonstrate that the accrual of benefits requirement is met.

Grantees wishing to use their own policy(ies) must submit the draft policy to BCAEO for approval prior to implementation. Draft policy review requests should be emailed to: [MDHHS-BCAEO@michigan.gov](mailto:MDHHS-BCAEO@michigan.gov) with a copy to the grant manager.

## File Documentation

Job files must include all applicable client file information required in CSPM Items 601 and 612, as well as the following documentation:

1. Verification of individual resident's income eligibility (if applicable)
2. A copy of the DHS-4284, Weatherization Assistance Program Application for Shelters, Group Homes and Transitional Facilities, with the following supporting documentation:
  - a. A signed statement from the facility operator attesting that individuals/households residing in the facility are income eligible.

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- b. A copy of the organization's income guidelines or a copy of the organization's mission statement in lieu of individual resident income verification.
- c. Written statement providing proof of benefit accrual to the low-income tenant(s).
- d. A copy of the written approval by the MDHHS BCAEO staff for the weatherization of any shelter, group home or transitional facility

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## 608.2 – LANDLORD AGREEMENT

### REFERENCES

10 CFR Part 440, Weatherization Assistance Program for Low-Income Persons

### BACKGROUND

10 CFR Part 440.22(b) (1) states: A subgrantee may weatherize a building containing rental dwelling units where the subgrantee has obtained written permission of the owner or his agent.

10 CFR Part 440.22 (b)(3) states: The Grantee has established procedures for dwellings which consist of a rental unit or rental units to ensure that:

The benefits of weatherization assistance in connection with such rental units, including units where the tenants pay for their energy through their rent, will accrue primarily to the low-income tenants residing in such units.

### POLICY

The Grantee will ensure a landlord agreement is completed for each building containing a rental dwelling unit to be weatherized, prior to the weatherization of any rental unit. A Tenant Synopsis must be signed by the tenant receiving weatherization services.

The landlord agreement on the following pages may be used or the Grantee may utilize its own document. Any Grantee customized document must contain the information on the sample agreement provided.

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## 608.3 – LANDLORD CONTRIBUTIONS

### REFERENCES

- 10 CFR Part 440, Weatherization Assistance Program for Low-Income Persons
- Weatherization Assistance Program Agreement
- Weatherization of Rental Units Frequently Asked Question on WAPTAC

### PURPOSE:

To establish guidelines for landlord contributions in the Weatherization Assistance Program.

10 CFR 440.22(d) states that as a condition of having assistance provided under this part with respect to multifamily buildings, a State may require financial participation, when feasible, from the owners of such buildings. Such financial participation shall not be reported as program income, nor will it be treated as if it were appropriated funds. The funds contributed by the landlord shall be expended in accordance with the agreement between the landlord and the weatherization agency.

A discussion in the preamble to the Final Rule amending the DOE WAP regulations dated March 4, 1993, (58 FR 12514), indicates the new (at that time) allowance for this Grantee requirement only applies to multifamily landlords, not single family. DOE does support Grantee and local agency efforts to *require* landlord participation in multifamily buildings, when feasible. However, the March 4, 1993 Final Rule does not allow Grantees to require contributions for single family rentals. In fact, the preamble indicates that “DOE feels that placing a requirement on this group [single family rentals] of dwelling units may have an adverse effect on their participation in the program”. *Id.* at 12523

### POLICY:

If the Grantee elects to require landlord contributions for multi-family units, the Grantee must have a written landlord contribution policy. The policy may include a cash contribution, rent reduction to the tenant, consideration of documented improvements made to the property within the last twelve months, or a combination of all three. The Grantee’s governing board is required to approve the landlord contribution policy if the Grantee is a Community Action Agency. A Grantee cannot require a landlord contribution for DOE single family rental homes, but a Grantee can encourage landlords that are able to contribute to do so as part of the weatherization work being completed.

The Grantee’s Landlord Agreement must incorporate language identifying the contribution option(s); the option(s) chosen by the Landlord; specifically, how the

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contribution will be used; any established landlord contribution unit cap; waiver criteria and if the contribution is waived, why it is waived.

The Grantee is required to maintain documentation that supports the disposition of landlord contributions as agreed upon between the Grantee and the landlord.

The U.S. Department of Energy considers landlord contributions leveraged funds and as such, they are to be used to expand energy efficiency services and/or increase the number of dwelling units weatherized. Therefore, DHHS encourages Grantees to apply cash contributions to labor and/or material costs.

Landlord cash contributions received should be applied to reduce the costs in the program year they are received. Report landlord cash contributions on the Statement of Expenditures, Section IV, Other Income, for the month in which they are received. Report cash contribution expenditures on the Statement of Expenditures, Section III, for the month they are spent.

Landlord contributions are **NOT** included in the average cost per unit.

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## 609 – DEFERRAL POLICY

### REFERENCES

DOE Weatherization Program Notice 21-1 Application Instructions

### PURPOSE

The purpose of this policy is to provide written policy identifying reasons to defer a unit scheduled to be weatherized.

### POLICY

The Grantee is required to have a written deferral policy which is in the best interest for its service area. The written deferral policy must outline the procedures to be followed when making a deferral decision and to notify the customer. It should include guidelines for establishing a time period for correction and an identification of resources and options to assist the applicant. Grantees must also include a list of potential reasons for deferral, which may not be all encompassing, as deferral reasons may be conditional or compounded by multiple issues.

#### Conditions where Grantee must not weatherize include:

- The dwelling was weatherized with a final close out date within the last 15 years
- The building or dwelling unit is scheduled for demolition/redevelopment.
- The condition of the structure would make weatherization impossible or impractical (e.g. inability to meet SWS)
- Per WPN 19-4, client refusal of any cost justified major measure. Agencies should make every attempt possible to educate clients around cost justified measures they are refusing. See CSPM 606.3 for further information on measure skipping.

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- Per WPN 19-4, if the building owner or occupant declines a measure not defined as a major measure prior to work beginning, the auditor must include in the client file a comprehensive justification, including background/source documents that support the decision to skip a specific measure. All other weatherization measures must be installed. If the auditor cannot access background/source documents that justifies the building owner/occupant's decision to decline a measure or the measure is defined as a "major measure", the situation must be fully documented in the client file and the job must be deferred due to client refusal. See CSPM 606.3 for further information on measure skipping.
- Encountering a mandatory reason for deferral as outlined in the Health and Safety plan (CSPM 614).

### **Grantees may defer in certain situations**

There are conditions or situations when an eligible dwelling unit should not be immediately weatherized. A determination may become evident during the eligibility process, during the audit or after work has begun. The decision to defer work in a dwelling is difficult, but at times necessary. This does not mean that weatherization assistance will never be available, but that work should be postponed until the problems can be resolved and/or alternative resources are found.

Grantees are expected to pursue reasonable options on behalf of the dwelling owner, and to use good judgment in dealing with difficult situations. If the unsafe conditions cannot be corrected by the Grantee due to funding constraints, cost limitations or because the complexity of the problem is considered beyond the scope of the weatherization; alternate funding should be recommended.

Grantees shall not simply defer service without pursuing other options and identifying other resources to address the identified hazard(s). Whenever appropriate, educational information on how to address the hazard shall be shared with the occupant. If corrections are made on a deferred dwelling that corrects the issue that led to the deferral, the Grantee may proceed with weatherization. Grantees are asked to maintain a list of deferred dwellings for that purpose.

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Grantees may elect to defer a home from receiving weatherization services where health and safety hazards exist for the staff, contractors or clients, or where conditions that cannot be addressed by WAP prevent the safe and effective implementation of weatherization measures.

**Conditions where a Grantees may defer, include, but are not limited to:**

- Evidence of infestations of rodents, insects, and/or other vermin.
- Unvented space heater(s) that may have a harmful effect on the air quality of the home.
- Unsecured pets that may prevent workers from safely completing their work.
- The presence of sewage or animal feces in or around the home.
- Improperly stored chemicals, combustible materials, or other fire hazards that present a danger to the occupants or the workers.
- Maintenance or housekeeping practices that limit the access of workers to the dwelling or create an unhealthy work environment.
- Major remodeling is in progress, which limits the proper completion of weatherization measures.
- If owners refuse cost effective measures as determined by the Weatherization Assistant (WA) software tool, Grantees must defer that dwelling per WPN 19-4 , see CSPM 606.3 for further details on Measure Skipping.
- The home receives HUD funding and at the time of completion, the unit will not meet applicable HUD Lead Based Paint standards.
- The extent and condition of lead based paint in the house would potentially create further health and safety hazards.
- 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.



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- The house has been condemned or electrical, heating, plumbing, or other equipment has been "red tagged" by local or state building officials or utilities and the conditions cannot be resolved with WAP funds.
- Electrical or plumbing hazards or structural failures that cannot be addressed/completed within Incidental Repair or Health and Safety (H&S) cost limitations.
- Standing water, remnant of standing water issues, mold, friable asbestos, deteriorated lead based paint surfaces, or other hazardous materials that cannot be addressed by the weatherization work.
- Moisture problems are so severe they cannot be resolved under existing health and safety measures and with minor repairs.
- Dangerous conditions exist due to high carbon monoxide levels in combustion appliances and cannot be resolved under existing health and safety measures.
- In the judgment of the energy auditor, any condition exists which may endanger the health and/or safety of the work crew or subcontractor, the work should not proceed until the condition is corrected.
- The cost to weatherize a home is so significant that it will negatively impact the Grantee's ability to meet the statewide average cost per dwelling (e.g. those homes that are more than 2x the state average). BCAEO must be notified in writing prior to deferring a dwelling for this reason.
- The client is uncooperative, abusive, or threatening to the crew, subcontractors, auditors, inspectors, or others who must work on or visit the house. Threat(s) of violence or abusive behavior to worker(s) or household member(s) during the weatherization process.
- The client/occupants has known health conditions that prohibit the installation of insulation and other weatherization materials.

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- The illegal presence or use of any controlled substance in the home during the weatherization process. This includes marijuana.
- The building or dwelling unit is for sale or in foreclosure.
- Ownership cannot be confirmed due to a legal dispute. Clear title must be established before services can be provided.

When the auditor/inspector or any other weatherization employee encounters an unsafe or inoperable heating appliance during the heating season, weatherization work should not proceed until the condition is corrected. If the measure is allowable in weatherization and determined to be necessary for the job, weatherization funds may be used to correct the condition. Please see CSPM 614 and the Michigan Health & Safety Plan for details on weatherization allowability.

Although Michigan has acknowledged marijuana as a legal substance, federal law does not recognize marijuana as legal. Therefore, federal law will prevail as the program is federally funded.

When service is deferred, the owner or occupant should be given a reasonable timeframe to correct/eliminate the problem. Examples of reasonable timeframes would be 30 days for housekeeping concerns or 90 days for major remodeling work. In cases where an individual client feels a deferral is unfairly determined, the individual client may appeal a decision to defer.

### **Deferral Notification Requirements**

Upon the decision to defer weatherization program services, the customer must be notified in writing within five working days.

The notice must include the reason for the deferral, and the means by which the applicant can rectify the situation so the weatherization measures can be performed. The requirements for rectifying the deferral must be reasonable and appropriate to the severity of the situation being addressed. Any eligible applicant that complies fully with these requirements shall be reinstated in the Grantee's work system so weatherization work can progress as soon as reasonably possible.

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There is no time extension for the eligibility period due to a deferral. If the dwelling cannot be reported as complete within the eligibility period, the customer must reapply for weatherization assistance. On a deferred unit, photographs documenting the reason for deferral (mold or other problems) are required and shall be part of the client file. If photographs are unobtainable, the reason(s) must be documented in the client file.

All deferrals and the reason for the deferral must be documented in FACSPRO WxPRO Module under the notes section of the deferral queue.

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## 610 – FUEL SWITCHING POLICY

### REFERENCES

- 10 CFR Part 440, Weatherization Assistance Program (WAP) for Low-Income Persons
- Weatherization Program Notice 19-4

### PURPOSE

To provide agencies guidance in allowability and process for fuel switching requests.

### POLICY:

BCAEO conducts State Administered Fuel Switching Approval. Fuel switching is allowable when the site-specific energy audit demonstrates the cost effectiveness of the fuel switch over the life of the measure as indicated by the Savings to Investment Ratio (SIR). Fuel switching is also allowed when justified for Health and Safety (H&S) reasons.

BCAEO was granted permission to conduct state level approval of fuel switches based on a demonstrated methodical review process. Therefore, all agencies in Michigan's WAP must follow the process as outlined below, and receive approval from BCAEO, before conducting a fuel switch.

### Fuel Switch Request Submission

To submit a fuel switch request, an agency must upload the following items into its agency SharePoint library.

- MDB file containing
  - Measures report
  - Input report
  - Fuel cost library
- IWC
- Photos of exterior of the dwelling
- Photos of the existing heating system
- Sketch of the dwelling including measurements
- Quote from the mechanical contractor for the new heating system including all hookup fees

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- Justification for fuel switch either being H&S or as energy savings

The agency must also email a notification to [MDHHS-BCAEO@michigan.gov](mailto:MDHHS-BCAEO@michigan.gov) noting that a fuel switch is being requested and the above documents have been uploaded into SharePoint.

If a heat pump or other combined heating-and-cooling system is to replace a heating-only (or cooling-only) system, no savings will be attributed to the previously non-existent cooling (or heating) system, but all the costs of running the system throughout the year will be included in the audit.

### **Other Appliances Attached to Fuel Source**

BCAEO will consider fuel switch requests based on an SIR or H&S for heating systems and/or water heaters. If another appliance, such as an oven, stove or dryer are affected by the fuel switch request, BCAEO will take that into consideration during the review. If the fuel switch is deemed necessary or cost effective for the intended appliance, BCAEO may permit the agency to replace or convert the other affected appliance(s) with a non-DOE funding source.

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## 611 – CLIENT PRIORITY SELECTION CRITERIA

### REFERENCES

- Department of Energy, 10 CFR Part 440.16
- Weatherization Program Notice 21-1
- Weatherization Assistance Program Memorandum 002
- Michigan Public Service Commission, Michigan Energy Appraisal Winter Outlook 2019/2020

### PURPOSE

A Department of Energy study noted that subgrantees that had a client priority system attained their service goals more frequently than those who did not have such a system.

### POLICY

Grantees are required to utilize a priority point system when determining homes to weatherize. Grantees must utilize the statewide point system set up in FACSPRO to determine priority points. The priority point system does not differentiate between eligible households that rent or own their dwellings. Each category is 1 point.

Mandatory and allowable priority categories are as follows:

- Elderly Units (defined in 10 CFR 440 as an individual who is 60 years of age or older)
- Disabled Units
- Households with children (defined as an individual below the age of 19)
- High Residential Energy Users –The Michigan Department of Licensing and Regulatory Affairs Public Service Commission, publishes an annual report titled “Michigan Energy Appraisal.” High Residential Energy User households are defined as meeting or exceeding the normalized heating fuel consumption projection identified in the Michigan Energy Appraisal by ten percent or more. Use the chart below to determine whether the household is eligible for this priority.

[https://www.michigan.gov/documents/mpsc/ea-winter19\\_671642\\_7.pdf](https://www.michigan.gov/documents/mpsc/ea-winter19_671642_7.pdf)

The Grantee must collect the heating fuel consumption records for the winter heating season: November through March each year. Compare the household consumption to the chart below. If the household consumption meets or exceeds 10% over the normalized midpoint (Column D) the household is eligible for a priority point in this category.			
Column A	Column B	Column C	Column D
Heating Fuel Type	Normalized Midpoint	Measure	10% above Midpoint

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	Projection		
Natural Gas	81	Mcf	89
Heating Oil	520	Gallons	572
Propane	635	Gallons	698

- Households with a High Energy Burden- defined as follows: any household that pays more than 20% of its total annual household income toward annual energy costs.

### **Grantee Prioritization**

Grantees determine how to best serve the eligible population in their service territory. Grantees may choose to use oldest eligibility date for positioning applicants with the same number of priority points.

Clients meeting one or more points will be considered Priority Applicants. Applicants with no priority points will remain at the end of the waiting list and will be served, oldest eligibility date first, after all "Priority Applicants" with one (1) or more points are served. All applications are required to re-verify the household income for the program annually. No applications on the waiting list should be older than one year. Grantees are required to have a written policy of their prioritization system. Grantees may not discriminate on service date due to the housing type of the client.

It is permissible to pull a client from the priority list out of order to engage with a leveraging opportunity, if the following guidelines are followed:

- Client is part of a group with an equal number of points at or near the top of the lists and
- Leveraging opportunity is rare and
- Subgrantee can defend the selection of the client for leveraging over other clients on the list.

When the Grantee's territory covers a large geographical area, it is also permissible to prioritize service based on cost effective scheduling considerations. For example, if a prioritized client lives in a county distant from the main offices, other homes in that area on the waitlist may be served during the same time period, if it eliminates costs and travel time for the agency.

Although reweatherization is allowable as spelled out in CSPM 605, the priority is to serve dwelling units that have not been previously weatherized.

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## 612 – APPLICANT FILE DOCUMENTATION

### REFERENCES

- 10 CFR Part 440, Department of Energy (DOE) Weatherization Assistance for Low Income Persons Program Regulations.
- WPN 17-7, WPN 19-5
- WAP Agreement

### PURPOSE

To ensure appropriate documentation is maintained for applicants of the Weatherization Assistance Program, minimum requirements have been established regarding such documentation.

### POLICY

A client file must be maintained on FACSPPro for each applicant. Grantees are responsible for maintaining all applicant information and technical weatherization documents for each home weatherized.

### Eligibility Documents

The following documents must be uploaded to FACSPPro using the document link on the customer intake screen (See CSPM 601 for additional eligibility policy)

- Signed FACSPPro Customer Report with Weatherization Disclaimer or Standard Application Form, DHS-4283 with updated weatherization disclaimer, including the Social Security Numbers of all household members. Actual social security cards are not required to be kept in the file but the social security numbers must be entered into FACSPPro.
- Signed FACSPPro Weatherization disclaimer. If using DHS-4283, agency must have a disclaimer that matches the FACSPPro Weatherization disclaimer for the



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customer to sign.

- Income eligibility documentation (pay stubs, award letters, etc.)
- Written notification to client
- Priority criteria selection
- Home ownership documentation (including rental units)
- Landlord Agreement (if applicable)
- Documentation of landlord contributions (if applicable)
- Per WPN 17-7, the rationale for performing each Health & Safety measure in an individual home and its relationship to the energy conservation measure (ECM) that necessitated it must be clearly documented in the client file.
- Per WPN 19-5, justification for the cost of each incidental repair measure (IRM) and why it is necessary for the effective performance or preservation of an ECM must be documented in the client file with photos and written explanation.
- Utility usage documentation for the 12 months before weatherization work begins and for the 12 months after a job is completed collected and entered into FACSPRO's Customer Intake Energy Tab. **Note:** The cost per unit must be calculated manually and will fluctuate from one month to the next.
  - In PY21, data collected from PY20 will be evaluated from the collection of utility data and the process will be updated and policy updated.
- BCAEO approval of self-declaration of zero income for the entire household (if applicable)
- Any other documents the Grantee has reason to believe will fully verify the income of the applicant household.

## Application

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A signed FACSPRO Customer Report for the applicant household, including the signed Weatherization Disclaimer, must be uploaded to the FACSPRO intake document section. A signed, completed Application for Weatherization Assistance, DHS-4283, may be used in place of the Customer Report when the application is mailed or taken at a remote location. The signature must be completed in ink. Grantees may use their own application form if it includes all the information on the DHS-4283 and has been approved by DHS. The Grantee must maintain a file for each applicant with the original signature Customer Report or DHS-4283. If an application is used, all required FACSPRO entries must still be completed so that a Customer Report is available for each applicant household (See CSPM Item 903).

**NOTE:** The uploaded Customer Report or DHS-4283 must include the Social Security Numbers of each household member.

Follow procedures in CSPM Item 601 to determine and document income eligibility.

The Grantee is required to determine eligibility within 30 calendar days from the date all documents needed for eligibility determination are received. In WxPro, this date defaults to the date that the client action plan is created. If documents needed to determine eligibility are not received within 90 days of the application date, the application is to be denied and the client notified.

### **Re-Certification of Application**

An applicant must be re-certified when eligibility lapses due to the length of time the applicant was waiting to receive Weatherization services. Re-certification, the redetermination of a household's eligibility, must occur at least every 12 months from the eligibility date, if the energy audit has not yet been initiated. This date must be within 30 calendar days from the date all documents needed for eligibility determination are received. In WxPro, this date defaults to the date that the client action plan is created and appears as the "Eligibility Determination Date" in the queues screens.

### **Applicant Notification**

Each applicant for weatherization services must be notified in writing of their eligibility status within 30 calendar days from the eligibility date. The notification must include, at a minimum, the following:

1. Applicant name, address and date

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2. The determination decision on program eligibility
3. If the applicant is eligible, an indication of when the work will begin
4. If the applicant is ineligible, the reason(s) for ineligibility, the right to appeal and the Grantee's appeal procedure

A copy of the written notification must be uploaded to FACSPRO on the customer intake screen.

### **Client Signature and Technical Weatherization Documents**

The following documents must be uploaded to the FACSPRO Weatherization Module under the Weatherization Application Documents tab within 30 days of completion of Final Close Out:

- Client Plan of Action
- DHS-4285, Pre-Renovation Form Confirmation of Receipt of Lead Pamphlet (or certificate of mailing) – See Item 615
- Michigan Weatherization Program Health & Safety Assessment Findings, DHS-552
- Release of Liability and Waiver of Claims, DHS-552-A (See CSPM 617)
- Weatherization Assistance Program Client Inspection/Assessment, DHS-1008
- Signed radon informed consent form
- Any other forms that require client signature (e.g., asbestos notice, unsafe condition, infrared scan, etc.)
- State Historic Preservation Office (SHPO) Documentation – See Item 619
- The following items must be included as a part of the energy audit:
  - A completed IWC, including;
    - ASHRAE
      - Preferred location of where the fan should be installed
      - CFM Requirements
      - Indication if continual use
      - Control switch location and preference

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- Will new wiring be needed?
- Lighting Systems
  - Number of bulbs
  - Suggested locations of where the bulbs should be installed
- Target goal for Blower Door CFM\*
- Pressure Diagnostics Tab
  - Pre-inspection pressure diagnostics numbers for attics, garages, and room pressures in homes with forced air heating systems
  - Pressure pan (if ducts outside the thermal boundary)
    - Pre measurements – collected by EA\*
  - Zone Pressure testing
    - Pre numbers – collected by EA\*
  - Room pressures
    - Pre numbers – collected by EA\*
- \*The QCI must provide post measurements on the blower door and the Pressure Diagnostics Tab
- Infiltration Details
  - In Weatherization Assistant, on the Air and Ducts Leakages tab under Ducts and Infiltration, list, at minimum:
    - Location of major air leaks
    - Estimated size of any large openings
    - Materials to match, if appropriate
    - Details for addressing chimneys properly, if applicable; and
    - Details for addressing hatches, if applicable
- Completed Work Order from FACSPRO

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- Drawing of house that:
  - Identifies room labeling and corresponds with work order
  - Shows measurements on diagram for proper square footage calculations and verification
  - Identifies windows and doors on all sides of drawing
  - Establishes the thermal and pressure boundary
- Completed Cost Center in FACSPRO
- Completed DOE-approved audit
- Manual J file documentation (if applicable)
- Quality Control Checklist completed and signed by the auditor upon audit, the crew leader upon completion of all measures, and the Quality Control Inspector upon Final Inspection
- All technical required testing results
- Infrared Scan Report including calculations/results
- Permits (e.g., mechanical, electrical, building, etc.), when applicable
- All invoices relevant to the job (may include general contractor, mechanical contractor, subcontractor, refrigerators, etc.)
- Specifications on any sprayfoam used on the project (air sealing or insulation)
- Certificate of Insulation, when applicable
- LRRP Documentation when applicable
- Any drawings, spreadsheets, WA8 Data sheets, field notes, or other information utilized in conjunction with completion of the SOM approved audit.
- All photos that document conditions of unit being weatherized supported by a CSPM-required Notice (e.g., Asbestos or Potentially Unsafe Conditions)
- If no Lead Safe Work Practices (LSW) required, documentation of why LSW was not required in the Notes section of WxPro.

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Documentation shall be maintained by the Grantee (or office of grantee) which establishes compliance with standards and testing requirements. Types of documentation may include manufacturer's specifications, material containers, and/or test lab reports. In cases where contractors are providing materials, the agency must maintain documentation on all products being used by each contractor. Product documentation shall be organized in one location and available for monitoring review.

## Photographs

An agency may choose to keep job photographs on an agency system. The agency is responsible for supplying the photographs to BCAEO staff upon request and in a timely manner (photograph requests must be met within four working days). The agency will be responsible for the storage of the photographs as outlined in the DOE agreement.

Agencies that do not wish to store their photographs on an agency system must upload photographs to the FACSPRO Weatherization Module under the Weatherization Application Documents tab (compressed to e-mail 96PPI).

Required photographs for each weatherization unit include:

- All sides of house
- Mobile home long side with entrance and end, immediately counterclockwise with remaining long side and end, immediately counterclockwise
- Basement/foundation
- Furnace, with venting if possible
- Domestic Water Heater (DWH), with venting if possible
- Combustion appliance venting if not able to capture in appliance photo
- Clothes dryer with venting
- Existing refrigerator
- Attic including insulation, knob & tube wiring and exhaust fan ducting, when applicable
- LSW set up, if charged to job
- Photos of exhaust fans and/or controls for ASHRAE compliance, where applicable
- Photographs of all call back work completed
- Photographs of all complaint follow ups
- LRRP Documentation when applicable

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- Photos that show anything out of the ordinary (e.g. large bypasses in attic, crawlspace clutter, etc.)

### **Multi-Unit File Documentation**

For multi-unit weatherization jobs, the file must include a completed approved field audit for each building. The audit must include all work including weatherization work performed in common areas like hallways, attics, basements, etc.

The client/building files should clearly indicate the structure is a multi-unit building and must be cross referenced with all other units weatherized in the building. Additionally, all client files must be clearly cross-referenced so that any reviewer can easily determine building eligibility under the 66 percent (50 percent) rule, or any other aspect of the weatherization work to that multifamily building.

The files shall clearly indicate weatherization measures to be completed. SOM approval shall be obtained to determine if one comprehensive audit or multiple audits are required.

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## 612.4 – APPLICANT FILE DOCUMENTATION – CLIENT ENERGY EDUCATION

### REFERENCES

10 CFR Part 440, Weatherization Assistance Program for Low-Income Persons

### PURPOSE

Client education and participation will help reduce energy costs in a weatherized dwelling.

The goal of the Weatherization Assistance Program is for the weatherization team (weatherization coordinator, intake staff, auditors, inspectors, and crews/contractors) and the client to work together as partners to save energy, to make the home more comfortable, and reduce energy bills.

The weatherization team must be aware of the importance of energy education for the client. Every effort must be made to increase client awareness through multiple contacts during the weatherization process. Staff and contractors must be aware they are the critical link in the partnership goal. Inclusion of the goal statement on literature, brochures, and forms the client must sign reinforces the partnership goal.

### POLICY

#### Intake

Energy education begins with intake. This is where the applicant is initially introduced to the weatherization assistance program, the goal statement, the partnership concept, and the applicant is advised of his/her role.

The following minimum steps related to intake must be included in the Grantee's Energy Education Plan.

1. Introduce the Weatherization Assistance Program. Explain the concept of the program, what work may be done, and expectations for the applicant's participation.
2. Complete the application in FACSPRO or the paper Application for Weatherization Assistance, DHS-4283. Retain the signed WAP application or signed FACSPRO client intake report with the Weatherization disclaimer in the client file.



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3. Determine eligibility and prioritize the applicant. See Item 611 regarding the client priority system.
4. Notify the applicant of the eligibility determination.
5. Ask the applicant to prepare for the audit by:
  - a. Making a list of energy questions and concerns
  - b. Making the attic, basement, and crawl space accessible
  - c. Making the perimeter accessible
  - d. Securing pets
  - e. Planning to be home and ready to participate

### Audit

It is important that the client be involved in the audit process. Client involvement is encouraged through commitment in writing to the goal statement and a minimum of *three energy action steps*. These energy action steps are to be placed in the client file and to be included with all documentation given to anyone who goes to the client's home.

The following minimum steps related to the audit process must be included in the Grantee's Energy Education Plan.

1. Explain the Weatherization Assistance Program, stressing what each partner will do during each step.
2. Explain the agenda of the audit and what the client will need to do.

Explain how the house loses heat. Inquire about the heating system. Talk with the client about whether some rooms seem warmer while others are cooler. Show the client how to adjust heat flow to different areas to save energy and provide more comfort. Point out areas where the client could take action to save energy and money.

3. Complete the audit.
4. Summarize the results of the audit for the client.
  - a. Explain the nature of the work that may be done on the home.
  - b. If the client is actively participating, agree on three energy action steps for the client to do.

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- c. If the client is actively participating, the Client Plan of Action should be signed by the client and auditor. A copy is to be provided to the client and the original must be uploaded to the FACSPRO Weatherization Module under the Weatherization Application Documents tab.

### Weatherization Work

When the crew or contractor is at the client's home, he/she should take advantage of every opportunity to reinforce the client's Energy Action Plan (E.A.P.). The theme of partnership and the goal statement need to be a part of the crew or contractor's interaction with the client for continued success.

The following minimum steps must be included in the Grantee's Energy Education Plan.

1. Introduce the contractor or crew to the client.
2. Complete a quick survey of the home, accompanied by the client. Reinforce the energy conservation work already done by the client.
3. Discuss the work plan for the day and proposed work for the client. Reinforce the three energy action steps to which the client committed.
4. Complete the work. Summarize the day's work for the client.
5. Explain the next step- inspection.

### Inspection

Reinforce the partnership between the Grantee and the client. Stress the importance of both the weatherization work and the client's action steps and explain that a breakdown of either could result in less than adequate comfort and savings to the client.

The following minimum steps must be included in the Grantee's Energy Education Plan:

1. Ask the client about the weatherization work.
2. If appropriate, ask about the client's three energy action steps.
3. Inspect the work.
4. Follow up on referrals.
5. If follow up is provided, explain the next step.

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The Grantee may wish to develop a Client Education Package to include the following items:

1. A generic letter introducing the Weatherization Assistance Program. See page 5.
2. An illustrated step-by-step energy savings guide. This could be distributed with the letter of introduction.
3. The client plan of action (required to be retained in the client file) and examples of energy action steps and the potential savings. See page 6 and 7.
4. A list of weatherization measures, which includes information relative to the contractor, if applicable. See page 9.
5. A generic letter to be provided to the client after the weatherization measures are completed. See page 10.
6. An illustrated guide for maintaining the weatherization measures installed.
7. A follow up survey. See page 11.

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Community Services Policy Manual	SUBJECT: Weatherization Assistance Program  <b>MAXIMUM AVERAGE COST PER UNIT</b>		EFFECTIVE DATE <b>7/1/2021</b> ISSUE DATE <b>5/2/2016</b>

## REFERENCES

- U.S. Department of Energy (DOE) –Weatherization Program Notice 21-1
- WAP Agreement

## PURPOSE

To identify the allowable maximum average cost per unit (ACPU) for Program Year (PY) 2019 and PY 2020.

Grantees are expected to maintain an average cost per unit at or below the maximum allowable cost per unit. Grantees with an average that exceeds the maximum allowable cost per unit may not be reimbursed for the amount exceeding the maximum allowable average.

## POLICY

Grantees are expected to maintain an average cost per unit at or below \$7,776. Support, labor, and materials costs are always included in the calculation of the average cost per unit.\*

Grantees with an average that exceeds the maximum allowable cost per unit may not be reimbursed for the amount exceeding the maximum allowable average. If at the end of the grant period the Grantee has been reimbursed over the maximum allowable average, the Grantee will be responsible for returning the overage amount to BCAEO.

Note: The adjusted average for renewable energy measures is not a separate average, but part of the overall adjusted average expenditure limit of \$7,776.

\*Vehicle purchases are also included in the calculation of the average cost per unit. To the extent possible, BCAEO will count this category toward the statewide average cost per unit but will allow flexibility on this category in counting toward the Grantee's average cost per unit. If the vehicle purchase category will put the statewide average cost per unit over the maximum allowable limit, the individual agencies who have costs in this category will need to amortize the vehicle over multiple program years to reduce the immediate statewide average cost per unit.

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Community Services Policy Manual	SUBJECT: Weatherization Assistance Program  <b>HEALTH AND SAFETY</b>		EFFECTIVE DATE <b>7/1/2019</b> ISSUE DATE <b>6/28/2017</b>

## 614 – HEALTH AND SAFETY

### REFERENCES

- Department of Energy Weatherization Assistance Program State Plan
- WAP Agreements
- DOE Weatherization Program Notice 17-7, WPN 17-7 Table of Issues, WPN 17-7 Attachment A
- Michigan Weatherization Field Guide

### PURPOSE

The State Plan for the Weatherization Assistance Program (WAP) addresses health and safety (H&S) provisions. The attached Health & Safety Plan provides for health and safety guidelines.

### POLICY

Allowable energy related H&S actions are those actions necessary to maintain the physical well-being of both the occupants and weatherization workers where:

- Costs are reasonable, as determined by DOE, and are in accordance with the Health & Safety Plan, attached to this CSPM; and
- The actions must be taken to effectively perform weatherization work; or
- The actions are necessary as a result of weatherization work.

No H&S measures can be performed in a home unless ECMs are also part of the scope of work

Health and Safety (H&S) funds may be used for:

- The elimination of energy related health and safety hazards, that are necessary before or because of the installation of weatherization measures (does not include windows and doors) and,
- As guided, and noted as allowable, in the Health & Safety Plan (attachment to CSPM 614):
  - H&S funds cover the cost of testing and the installation of measures.
  - Client education or training costs can be charged to Training and Technical Assistance budget.

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- When Measures, Testing, Client Education, and Training are required or allowed in the H&S plan, DOE WAP funds may be used unless specified otherwise.
- The client file must include documentation that separates all costs into the appropriate budget category, including H&S.
- The rationale for performing each H&S measure in an individual home and its relationship to the ECM that necessitated it must be clearly documented in the client file.

To ensure that program services concentrate on energy efficient measures, H&S measures must not total more than 50% of the total job cost. If H&S costs of a job do exceed more than 50% of the total job costs, the Grantee may submit a waiver for approval from BCAEO technical staff. The Grantee is responsible for documenting the email approval from the technical staff and including it with the file documentation. In instances where the H&S measure that pushes the H&S cost over 50% of total job cost is an ASHRAE fan or system, the subgrantee may move forward on the project without review and permission from the MDHHS-BCAEO Weatherization Specialist. Buildings that cannot be weatherized without the H&S measures shall be deferred. H&S measures are not considered as part of the cumulative SIR and do not need an SIR to install. They are not included in the Average Cost Per Unit and are billed to their own line item.

**NOTE:** DOE funds shall not be used to meet code compliance.

### **Mandatory Health & Safety Measures**

Some Health and Safety measures are mandatory to install or ensure. For the details on these items, see the "Mandatory Health & Safety Measures" section of CSPM 606.3.

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Community Services Policy Manual	SUBJECT: Weatherization Assistance Program  <b>LEAD PAMPHLET</b>		EFFECTIVE DATE <b>7/1/2018</b> ISSUE DATE <b>7/22/2011</b>

## 615 – LEAD PAMPHLET

### REFERENCES

- DOE Weatherization Program Notice 17-7
- DOE Weatherization Program Notice 17-7, Table of Issues
- Environmental Protection Agency (EPA) Final Rule, 40 CFR Part 745

### PURPOSE

The Weatherization Program Notice 17-7 Table of Issues, page 9, states:

“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.”

**Under the regulation EPA 40 CFR Part 745, local agencies who do not give proper notification could incur hefty fines if found doing renovation work in pre-1978 housing stock.**

### POLICY

EPA regulations 40 CFR Part 745 must be followed for all weatherization work in pre-1978 housing that disturbs more than two square-feet of painted surface. Per the regulations, housing for the elderly or disabled, where children are not expected to reside, is exempt.

Prior to beginning weatherization work in any pre-1978 housing unit where more than two square-feet of painted surface may be disturbed, Grantees shall provide the owner of the unit with the approved EPA lead pamphlet, and:

- obtain written confirmation of receipt by the owner on form DHS-4285, Pre-Renovation Form Confirmation of Receipt of Lead Pamphlet or
- obtain a certificate of mailing at least seven days prior to the start of weatherization work.

In addition, if the owner does not occupy the dwelling unit, provide an adult occupant of each unit with the pamphlet and:

- DHS-4285 or
- certify in writing on form DHS-4285 that a pamphlet has been delivered to the dwelling and that you have been unsuccessful in obtaining a written confirmation from an adult occupant or

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- obtain a certificate of mailing at least seven days prior to the start of work.

When the owner or occupant is signing the DHS-4285, it must include:

- owner or occupant's name,
- address of unit,
- signature of the owner or occupant as applicable, and
- the date of signature.

When Grantee has tried and is unable to deliver the pamphlet to an occupant, the DHS-4285 must include:

- address of unit,
- the date and method of delivery of the pamphlet,
- name of the person delivering the pamphlet,
- reason for lack of acknowledgement,
- the signature of the person delivering the pamphlet and
- the date of signature.

When mailing the pamphlet, Grantee must obtain a certificate of mailing from the post office.

The DHS-4285, Pre-Renovation Form Confirmation of Receipt of Lead Pamphlet, and certificate of mailing must be kept in the job file.

The EPA lead pamphlet, *Renovate Right. Important Lead Hazard Information for Families, Child Care Providers and Schools* may be obtained at the following link:

<https://www.epa.gov/lead/renovate-right-important-lead-hazard-information-families-child-care-providers-and-schools>

You may make copies to distribute to homeowners and occupants (non-owner occupied) who live in pre-1978 housing.



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Community Services Policy Manual	SUBJECT: Weatherization Assistance Program  <b>LIABILITY INSURANCE</b>		EFFECTIVE DATE <b>07/01/2018</b> ISSUE DATE <b>7/17/2013</b>

## 616 – LIABILITY INSURANCE

### REFERENCES

- CFR 440.18
- U. S. Department of Energy (DOE) Weatherization Assistance Program Application Instructions

### PURPOSE

States are reminded that all work must be covered by liability insurance. States should inform local agencies that sufficient liability coverage for DOE funded activities should be obtained. Liability insurance should be charged to the liability line item in the budget. It should be noted that the liability insurance line item was created to ensure that such costs would never have to be charged to the administrative cost category. (See preamble to Federal Register, Volume 45, Number 40, published February 27, 1980, page 13031).

### POLICY

Each agency must review the language above to determine if they have adequate liability insurance for all work performed. Things to consider in making this decision are that we do not determine degree of lead content and we do not abate lead. The U. S. Department of Energy Weatherization Assistance Program work is excluded from the definition of new construction or rehabilitation as long as activities do not disturb painted surfaces that total more than:

- Six square feet of any interior space per room

Note: total surface area includes the total of all disturbed surfaces.

Local Weatherization Operators (LWOs) are no longer required to have Pollution Occurrence Insurance (POI). DOE continues to strongly recommend POI. The POI policy cannot exclude lead if DOE funds are used to purchase it. LWOs are strongly advised to either refer or defer weatherization work that will disturb surfaces that may contain lead-based paint, until they have insurance that provides coverage for Lead Safe Weatherization (LSW) work situations involving lead-based paint.

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Also, local agencies that employ private contractors to perform weatherization services must ensure that each private contractor is adequately insured as well.

Liability insurance, including POI, must be charged to the Liability Insurance line item in the budget.

If a local agency chooses not to hold POI coverage and damage occurs because of not following all aspects of LSW, or there is a disturbance to any other environmental pollutants; the cost to do remediation, clean up, relocation, medical expenses or any other resulting costs may not be charged to the DOE contract and must be covered by another funding source.

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Community Services Policy Manual	SUBJECT: Weatherization Assistance Program  <b>RELEASE OF LIABILITY AND WAIVER OF CLAIMS</b>		EFFECTIVE DATE <b>7/1/2019</b>  ISSUE DATE <b>5/15/2007</b>

## 617 – RELEASE OF LIABILITY AND WAIVER OF CLAIMS

### REFERENCES

- Weatherization Program Notice 17-7
- Weatherization Program Notice 17-7 Table of Issues

### PURPOSE

**The Weatherization Assistance Program is not a mold remediation program.** The use of DOE funds for the removal of mold and other related biological substances is not an allowable weatherization expense. DOE funds should not be used to test, abate, remediate, purchase insurance, or alleviate existing mold conditions identified during the audit, the work performance period or the quality control inspection. If necessary, weatherization services may need to be delayed until the existing mold problem can be referred to another agency for funding of remedial action.

All dwellings shall be checked for previous or existing mold and moisture problems. Audit procedures shall include a mold and moisture assessment, including a mold protocol or checklist. The assessment shall be a visual review that includes these four categories:

- General building envelope
- Outside/Site
- HVAC
- Occupied space

If a mold condition is discovered during the initial inspection of the home by the energy auditor that cannot be adequately addressed by the weatherization crew/contractor, then the unit should be referred to the appropriate public or non-profit agency for remedial action.

Effective immediately, all States should ensure that their local agencies include some form of notification or disclaimer to the client upon the discovery of a mold condition and what specifically was done to the home that is expected to alleviate the condition and/or that the work performed should not promote new mold growth. This notification/disclaimer should be discussed with and signed by the client and/or landlord.

### POLICY

LWOs must use the Release of Liability and Waiver of Claims, DHS-552-A, to ensure clients are informed of the limited health and safety assessment that will be done on the unit as well as potential health and safety problems that may be identified in the process or

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may result during weatherization work. The Release will also include recommendations for individuals with certain health conditions. The client's signature authorizing weatherization work to proceed and releasing the LWO of liability must be obtained. A copy of this release must be in the client file of every completed unit.

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## 618 – WEATHERIZATION ASSISTANCE PROGRAM TRAINING & CERTIFICATION REQUIREMENTS

### REFERENCES

- State of Michigan Department Of Energy State Plan
- Department of Energy Weatherization Program Notice 15-4
- WAP Memorandum 034
- WAP Memorandum 036
- Michigan Weatherization Field Guide
- WAP Agreements
- National Renewable Energy Laboratories Job Task Analysis (JTAs)

### PURPOSE

To ensure Grantee Technical Weatherization Staff have the qualifications and skills to meet the DOE identified, National Renewable Energy Laboratories (NREL) Job Task Analysis (JTA), for each position in which the weatherization worker is employed and to ensure compliance with Weatherization Program Notice 15-4 (WPN15-4) as clarified by WAP Memorandum 034.

### POLICY

Please refer to the Attachment to 618 & 618.1 – T&TA Plan. The plan was added to the DOE state plan process in PY21 and covers information that was previously covered in CSPMs 618 and 618.1. If a situation arises where there is a perceived discrepancy between CSPM and the T&TA Plan, the T&TA Plan supersedes CSPM. If an agency identifies a perceived discrepancy, please contact the Weatherization Specialist immediately for clarification.

All Grantees are responsible for ensuring that all weatherization workers are familiar with the NREL JTAs for each position and performing work to meet the JTA standards and the Standard Work Specifications in order to ensure quality work on every weatherization project.

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All training completions, dates, staff, and certifications for the Weatherization Assistance Program (WAP) that have occurred outside of MiTEC are to be entered by each subgrantee into SharePoint. For each of these items that happened within MiTEC, the student's record is maintained within the Learning Management System (LMS) and does not need to be submitted in SharePoint. A transition plan began in PY 2019 to move all items into the LMS. Each Subgrantee is required to inform BCAEO of any agency contractor/staff that achieves any of the Home Energy Professional certifications. Subgrantees can inform BCAEO by emailing the [MDHHS-BCAEO@Michigan.gov](mailto:MDHHS-BCAEO@Michigan.gov) mailbox and including the Agency name, certified staff/contractor, type of certification, and date of certification.

### Retention Agreement

The DOE recommends that a sponsoring agency secure a retention agreement with each sponsored candidate. An example of this agreement is included as **Attachment A**. Please note that this is a sample agreement and each Grantee may want to add or refine language. For example, a grantee may insert items in section 1.b. to further list the types of costs associated with training. The time frame of 12 months shown in section 3 is also a guideline and can be adjusted to more accurately align the funds spent on training with the retention period. A Grantee may want to have a retention agreement for any level of training.

### Training Cancelation Costs

Any contractor or staff that registers for a training course through BCAEO is obligated to attend that training. If a contractor or staff person needs to cancel his or her attendance at a training, he or she must cancel the registration with BCAEO with greater than two business days' notice. If the contractor or staff person cancels with less than two business days' notice, or does not attend the training without informing BCAEO, the Grantee will be charged a fee of \$100.

### DOE Identified Training Descriptions

**Comprehensive Training (previously called "Tier 1 Training"):** Comprehensive, occupation-targeted 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 accredited by a DOE-approved accreditation organization for the specific JTA being taught.

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Examples of Comprehensive Training include:

Retrofit Installer/Technician, Crew Leader, Energy Auditor and Quality Control Inspector courses delivered by Interstate Renewable Energy Center (IREC)-accredited training providers, accredited for the JTA matching the job category.

Search for accredited training programs here:

<https://irecusa.org/credentialing/credential-holders/>

Currently, IREC is the only accreditation body accrediting weatherization training programs. In order for technical field staff to maintain this training requirement, they must participate in Comprehensive training in alignment with their JTA every five years.

Individuals working in alignment with a JTA must register annually through a survey, or through the agency application, with BCAEO that they are working in this role.

**Specific Training (previously called “Tier 2 Training”):** Short-term training to address acute deficiencies in the field, single-issue training, conferences, and program management or leadership training is considered Specific Training since they do not encompass an entire JTA.

Examples of Specific Training include:

- On-the-job dense-pack insulation training
- State or agency training on new field guides or program guidance
- Software training for administrative personnel
- Management or leadership training seminar
- Weatherization conference sessions

Specific training may be provided by accredited or non-accredited training providers. Specific Training should be provided on an as-needed basis, as determined by monitoring reports, self-surveys, or other methods.

MiTEC, Michigan’s training center, is not yet accredited by a DOE approved certifying body but is working to become accredited. During PY19 and into PY20 until accredited, MiTEC will coordinate with partnering training centers accredited by a DOE approved certifying body to make Comprehensive training available in alignment with the JTAs. See below for details on requirements. MiTEC may provide Specific Training to Grantees on topics as identified as necessary by the Grantee or by BCAEO. Once accredited, MiTEC will provide nearly all Specific and Comprehensive training to the Michigan WAP network.

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## Comprehensive Training/Certification Requirements for NREL JTAs

**Quality Control Inspector:** Each grantee shall require and ensure that the Quality Control Inspector, performing final inspections on WAP completions, has a Quality Control Inspection (QCIs) certification from a DOE approved certifying body. On March 1<sup>st</sup>, 2019, QCI became a microcredential of Energy Auditor. After March 1<sup>st</sup>, 2019, all new or renewing QCIs must also be certified as an Energy Auditor through a DOE approved certifying body and hold the QCI microcredential.

**Energy Auditor:** Each grantee shall ensure that the Energy Auditor is performing work in compliance with the Energy Auditor JTA. Formal training for Energy Auditor must be provided by, or in cooperation with, a DOE approved accredited training organization. Individuals working in this role must participate in Comprehensive training every five years. If the job is not being performed in compliance, the Grantee must have a training plan in place to ensure compliance. In PY20, individuals working in this role who have not received Comprehensive training in the past three program years, must participate in this Comprehensive training.

**Crew Leader:** Each grantee shall ensure that the Crew Leader is performing work in compliance with the Crew Leader JTA. Any formal training for Crew Leader must be provided by, or in cooperation with, a DOE approved accredited training organization. Individuals working in this role must participate in Comprehensive training every five years. If the job is not being performed in compliance, the Grantee must have a training plan in place to ensure compliance. In PY20, individuals working in this role who have not received Comprehensive training in the past three program years, must participate in this Comprehensive training. Individuals working in the Crew Leader role that missed their Comprehensive Training requirement in PY 2019 must take the Air Sealing and Dense Pack Insulation trainings as a component of their Comprehensive Training.

**Retrofit Installer:** Each grantee shall ensure that the Retrofit Installer is performing work in compliance with the Retrofit Installer JTA. Any formal training for Retrofit Installer must be provided by, or in cooperation with, a DOE approved accredited training organization. Individuals working in this role must participate in Comprehensive training every five years. If the job is not being performed in compliance, the Grantee must have a training plan in place to ensure compliance. In PY20, individuals working in this role who have not received Comprehensive training in the past three program years, must participate in this Comprehensive training. Individuals working in the Retrofit Installer role that missed their Comprehensive Training requirement in PY 2019 must



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take the Air Sealing and Dense Pack Insulation trainings as a component of their Comprehensive Training.

### **Specific Training/Certification Requirements for Weatherization workers**

#### **Lead Safe Work and Lead Renovator Repair Painting Training**

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. In order to comply with EPA rules, shell contractor companies and agencies that employ crews must hold the EPA firm license in addition to requirements for individuals. Crews must follow EPA's Lead; Renovation, Repair and Painting Program (LRRP) when working in pre-1978 housing unless testing confirms the work area to be lead free. Different roles in Weatherization have different requirements for Lead Safe Work (LSW) or LRRP training and certification. All required training/certification must be completed within 180 days of the date they are hired. Documentation relative to LSW/LRRP certification shall be maintained at the agency. Requirements are as follows:

- **Energy Auditors and Quality Control Inspectors**
  - Individuals in these roles must receive either LSW or LRRP training and must follow EPA rules.
- **Mechanical, Electrical and Plumbing Contractors**
  - Individuals in these roles must follow EPA rules, but there are no training requirements for individuals beyond those listed generally in this section.
- **Shell Contractors and Crews (Crew Leaders and Retrofit Installers)**
  - Individuals in these roles must receive either LSW or LRRP training and must follow EPA rules.

#### **Health & Safety Training (formerly Indoor Air Quality/Mold Training)**

Please see the "Course Catalog for Specific Training" for the description of this training.

New staff is required to attend training within 180 days of the date they are hired. Individuals who have not attended one of these training sessions will not be permitted to inspect, supervise, and/or work on the dwellings to be weatherized unless they are accompanied by or in the presence of staff who have attended the required training. Documentation relative to H&S certification shall be maintained at the agency. Health & Safety (H&S) training is required for individuals in the Michigan WAP as listed below. For further details on the H&S training, contact MDHHS-MiTEC@Michigan.gov.

- **Energy Auditors and Quality Control Inspectors**
  - Individuals in these roles must receive H&S Training.
- **Mechanical, Electrical and Plumbing Contractors**

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- Individuals in these roles are not required to receive H&S Training.
- **Shell Contractors and Crews**
  - Individuals in these roles must receive H&S Training.

### **OSHA Training**

Training shall be provided by Occupational Safety and Health Administration qualified instructor. The construction “10-hour Occupational Safety and Health training course” is required. All Energy Auditors/QC Inspectors and agency crews/contractors who have not attained certification will not be permitted to independently inspect, supervise, and/or work on the homes to be weatherized unless they are accompanied by or in the presence of staff who have attained the required certification. New staff (Energy Auditors/QC Inspectors and agency crews/contractors) are required to attend training within 180 days of the date they are hired. Documentation relative to certification shall be maintained at the agency. The OSHA 30 hour course is not required for individuals in the Michigan WAP, but may replace the OSHA 10 hour to meet this requirement. (NOTE: Weatherization Agency Crew Leaders are no longer required to take the OSHA 30 hour course).

### **ASHRAE Training**

Michigan’s WAP received on-site monitoring from DOE during PY 2019. In response to the issues discovered during this monitoring visit, the BCAEO is requiring that all WAP **Energy Auditors** and **QCIs** take ASHRAE 62.2 training during PY 2020. This required training is to ensure that those in the appropriate roles in Michigan’s WAP workforce understand ASHRAE calculations and proper use of calculation forms. The items of concern from the DOE monitoring around training were covered in the ASHRAE training offered by MiTEC in PY19. For that reason, individuals who participated in that training during PY19 will not be required to take them again in PY20.

### **CAZ Training**

Michigan’s WAP received on-site monitoring from DOE during PY 2019. In response to the issues discovered during this monitoring visit, the BCAEO is requiring that all WAP **Energy Auditors** and **QCIs** take CAZ training during PY 2020. This required training is to ensure that those in the appropriate roles in Michigan’s WAP workforce understand proper CAZ testing for all conditions. The items of concern from the DOE monitoring around training were covered in the CAZ training offered by MiTEC in PY19. For that reason, individuals who participated in that training during PY19 will not be required to take them again in PY20.

### **Mobile Home Training**

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Michigan's WAP received on-site monitoring from DOE during PY 2019. In response to the issues discovered during this monitoring visit, the BCAEO is requiring that all WAP **Energy Auditors, QCIs, Crew Leaders and Retrofit Installers/Technicians** take Mobile Home Weatherization training during PY 2020. This required training is to ensure that those in the appropriate roles in Michigan's WAP workforce understand proper duct pan testing and duct sealing. The items of concern from the DOE monitoring around training were covered in the Mobile Home training offered by MiTEC in PY19. For that reason, individuals who participated in that training during PY19 will not be required to take them again in PY20.

### **Customized Required Training**

In addition to the required trainings described above, the BCAEO will require training as necessary based upon DOE monitoring results, BCAEO monitoring results and feedback provided from WAP stakeholders.

### **Agency Documentation Requirements**

- Documentation (e.g. copy of certificate) of Environmental Protection Agency (EPA) required Lead Renovator Repair Painting (LRRP) training for crew, staff, and subcontractors
- Documentation (e.g. copy of certificate) of EPA LRRP Firm status as required including expiration date
- Documentation (e.g. copy of certificate) of EPA LRRP Renovator status as required including expiration date
- Documentation of individuals' certification in LSW (if not LRRP certified)
- Documentation of individuals' certification in IAQ
- Documentation of individuals' certification in OSHA 10 hour or 30 hour
- Documentation of all individuals' participation in Comprehensive training and their relevant certifications, if applicable.

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## 618.1 – WEATHERIZATION ASSISTANCE PROGRAM INSPECTOR TRAINING

### REFERENCES

- State of Michigan DOE State Plan
- Michigan Weatherization Field Guide
- Community Services Policy Manual
- Weatherization Program notice 15-4
- WAP Memorandum 034

### PURPOSE

Weatherization Assistance Program (WAP) Energy Auditor/ Quality Control (QC) inspector training and testing requirements will be administered and/or monitored by the State of Michigan (SOM), Bureau of Community Action and Economic Opportunity (BCAEO).

### POLICY

Please refer to the Attachment to 618 & 618.1 – T&TA Plan. The plan was added to the DOE state plan process in PY21 and covers information that was previously covered in CSPMs 618 and 618.1. If a situation arises where there is a perceived discrepancy between CSPM and the T&TA Plan, the T&TA Plan supersedes CSPM. If an agency identifies a perceived discrepancy, please contact the Weatherization Specialist immediately for clarification.

#### **Quality Control Inspectors (QCI)**

QCIs working for, or contracted by, the WAP must possess the knowledge, skills and abilities in the NREL Job Task Analysis for QCIs. This applies to all individuals who perform an evaluation and sign off on work performed in homes. The QCI has no involvement in the prior work on the home either as the auditor or as a member of the crew. All QCIs performing final inspections must have a IREC accredited Quality Control Inspector Certification.

Single Family:

QCI competency is demonstrated by certification as a Home Energy Professional Quality Control Inspector.

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QCIs can be employed by third party organizations or subgrantees; however, the Grantee is ultimately responsible for ensuring that every completed unit reported meets the quality guidelines required by the Weatherization Assistance Program. The Grantee must provide in their Grantee plan a policy for validation of the QCI credentials.

The Grantee must have policies and procedures in place to address situations where a QCI is not inspecting units using the standards adopted by the Grantee and consistent with the SWS. The policy must include monitoring of the QCI and procedure's for disciplinary action if the Grantee inspection protocols are not followed.

Multifamily:

Grantee training plans must include requirements to ensure that QCIs working in multifamily buildings attend and receive a successful evaluation from a training program delivering a curriculum based on the NREL Multifamily Quality Control Inspector JTA.

### **Energy Auditors**

All Energy auditor candidates must be sponsored by one of the Grantee agencies in the Michigan WAP network. The sponsoring Grantee will be responsible for the field training necessary to prepare candidates sufficiently for other required training and testing. Grantee training should include agency specific paperwork and protocol used during the audit/inspection process. See CSPM 618 and the Grantee Training section below for required training elements.

Energy auditor candidates shall complete all required training sessions and must pass all required tests, prior to performing any WAP energy audits independently.

The Energy Auditor must possess the knowledge, skills and abilities in the National Renewable Energy Laboratory (NREL) Job Task Analysis for Energy Auditor. If a candidate holds the BPI Energy Auditor certification, they may perform energy audits. In order for a Quality Control Inspector to perform energy audits, testing with BCAEO technical staff is recommended but not required. However, the Grantee must still require time in the field with BCAEO technical staff prior to allowing the QCI to perform energy audits for the WAP Grantees are responsible for documenting field time and ensuring the Energy Auditor can perform all required tasks in compliance with the Standard Work Specifications, WAP policy, and state and federal policy. Field requirements are listed below.

If the Energy Auditor does not have the certifications listed above, they must complete the required time in the field, testing/certification requirements and an over the shoulder test conducted by BCAEO technical staff.

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If a Grantee chooses to utilize an Energy Auditor that has not been certified by the SOM, but holds the BPI Quality Control Inspector or BPI Energy Auditor certifications as listed above, it is the Grantee's responsibility to ensure the Energy Auditor can perform all tasks related to the WAP including WA8, FACSPRO, IWC policy requirements, and ensuring performance and skills meet the requirements of the WAP.

Regardless of certification or training status, Local Weatherization Program Managers may elect to have all individuals working as Energy Auditors be trained and tested by BCAEO technical staff when:

- Prior job performance has been weak
- Prior quality control checklists show missed opportunities
- Prior jobs require call backs
- The Energy Auditor has not performed an energy audit for an extended period of time
- The Energy Auditor's credentials are out dated
- The Energy Auditor is new to the agency
- Other reasons needed to show the skill level of the Energy Auditor

Additionally, if an individual holds the State of Michigan Energy Auditor certification but has not worked in a JTA within the past year, that individual must re-certify as an Energy Auditor with BCAEO technical staff. Through BCAEO quality assurance monitoring, it may be determined that a State of Michigan Energy Auditor must re-certify with BCAEO technical staff.

## Training Components

Energy Auditor training and testing consists of five required components:

1. Comprehensive Energy Auditor Training
2. Field Experience - a minimum of three months
3. Grantee Training
4. SOM Training & Testing
5. SOM Over-the-Shoulder Skills Assessment

### 1. Comprehensive Energy Auditor Training

Individuals working in this role must meet the Comprehensive Training requirements spelled out in CSPM 618.

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## 2. Field Experience

A minimum of three months of actual field experience is required for any energy auditor that does not have a SOM Energy Auditor/QCI certification. Field experience is defined as the time actually spent accompanying a SOM certified Energy Auditor on DOE WAP audits conducted at the Grantee level and in the completion of all required WAP documents. It is an allowable DOE expense to pay said Energy auditor candidate a stipend for shadowing experienced, certified Energy auditors during this time.

The Energy Auditor candidate must participate in a minimum of ten audits. Five of the ten should be done as assistance to the certified Energy Auditor and for the other five, the Energy Auditor candidate should take the lead with the certified Energy Auditor assisting minimally.

If the grantee does not have a certified Energy Auditor on staff, the grantee should contact another network grantee to schedule the Energy auditor candidate to work with that agency's certified Energy auditor. If the grantee has a contracted certified Energy Auditor, a stipend may be paid to allow the Energy Auditor candidate to accompany the certified Energy Auditor.

## 3. Grantee Training

The sponsoring grantee is responsible for the following training for all Energy Auditor/QC Inspector candidates:

- Client Interview including:
  - Indoor Air Quality (IAQ) (DHS-552) information
  - Lead Notice
  - Client Plan of Action
  - Energy Education
- Recordkeeping
  - IWC
  - SHPO
  - DOE approved audit
  - Work Order
  - Change Order process
  - All appropriate notices
  - Client Assessment
  - Final Inspection Job Information

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- Other
  - Completion of the IWC
  - The transfer of the IWC into FACSPRO
  - The transfer from FACSPRO into the DOE approved audit
  - Completion of the DOE approved audit
  - Generation of the SIR driven work order from the DOE approved audit

During the three-month training period, the sponsoring agency may contact the BCAEO at [MDHHS-MiTEC@michigan.gov](mailto:MDHHS-MiTEC@michigan.gov) to request training in any areas necessary for the candidate.

#### **4. BCAEO Training & Testing**

BCAEO technical training includes:

- LSW (Lead Safe Work Practices) optional if LRRP Certification is obtained
- H&S (Health & Safety)

These trainings are offered regularly upon agency request by BCAEO at MDHHS-MiTEC@Michigan.gov. LSW and H&S both including testing and certification

#### **5. Other required WAP training includes:**

- LRRP (Lead Renovator and Repair) (See CSPM 618 for requirements) – information available at: [www.michigan.gov/leadsafe](http://www.michigan.gov/leadsafe) or call (866) 691-5323 or <http://www2.epa.gov/lead/renovation-repair-and-painting-program-training-providers>
- OSHA/MIOSHA – information available at: [http://www.michigan.gov/lara/0,4601,7-154-61256\\_11407---,00.html](http://www.michigan.gov/lara/0,4601,7-154-61256_11407---,00.html)

### **SOM Energy Auditor Over-the-Shoulder Skills Assessment**

Upon completion of the entire curriculum, testing and the three-month field experience, candidates shall request to take the Prerequisite test.

Contact the BCAEO MDHHS-MiTEC@michigan.gov to make those arrangements. This test will be administered by BCAEO staff.

#### Over-the-Shoulder Skills Assessment Protocol



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Candidates will receive a notice with the date and time of the scheduled field observation. Scheduling will be determined by the workload of the BCAEO technical staff. Assessments will be scheduled quarterly at a minimum.

It is critical that candidates arrive at the test house at the time indicated to ensure enough time to complete the entire process. Candidates will have three (3) hours on-site to complete the audit and twenty-four (24) hours from the conclusion of the on-site audit to submit, via email, the complete audit documentation. Candidates will be provided a Candidate Field Test Observation Process form that will record the date and time all documentation must be submitted. If the candidate must travel a significant distance to reach the test house, a request to adjust the 24-hour period should be made to the MDHHS BCAEO proctor prior to the test date. Candidates not submitting all required documentations within the prescribed timeframes will not achieve certification. The test areas on which candidates will be evaluated are included below. The required documentation is listed on the Michigan Weatherization Assistance Program Energy Auditor Candidate Field Test and Score form provided to each candidate.

### Equipment

All equipment necessary to complete the skills assessment must be provided by the sponsoring agency or the candidate.

### Test House Criteria

Skills assessment requests are logged and scheduled by BCAEO staff as closely as possible in the order received. The sponsoring Grantee must secure a client house for the process. The test house criteria are included in **Attachment B**.

**Note:** If possible, agency staff should inspect the house prior to the test day to ensure there are no gas leaks. BCAEO staff has had numerous field observations delayed and/or ended due to gas leak problems.

### Skills Assessment Scoring

The following criteria will constitute a passing Skills Assessment and result in certification:

- The Energy auditor candidate achieves an overall passing score, AND

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- Satisfactorily completes the gated items.

During the Skills Assessment, the Energy Auditor candidate is observed and scored on the criteria defined in the test. The assessment tool is based upon the DOE standardized curricula with compliance to all State of Michigan and local code requirements. The candidate will be evaluated upon successfully completing the audit and submitting all required paperwork to the MDHHS BCAEO proctor.

Once certified, the Energy Auditor can conduct independent audits.

#### Test Areas

See CSPM 618.2 Job Task Analysis for Energy Auditor.

#### Timelines

Upon arrival at the test site, each candidate will receive the "Michigan WAP Energy Auditor Candidate Skills Assessment" form. The form will include the date and time of the candidate field test, the address, and the date/time that all required documentation must be submitted to the DHHS BCAEO proctor.

The candidate will have three (3) hours on site to complete his/her inspection and twenty-four (24) hours from the conclusion of the on-site inspection to submit all required inspection documentation.

Note: Requests for consideration of travel time to and from test site will be considered on a case by case situation. Please advise BCAEO staff of this request at the time of the observation process reservation.

Candidates must email all required inspection documents to the MDHHS BCAEO proctor at the email address furnished at the assessment.

#### Required Documentation

The required documentation MUST include all of the following:

- Complete field audit document (IWC)
- Copy of all site produced notices
- NEAT wdz file of completed audit used for FACSPRO Work Order
- Complete work orders that identify all NEAT required measures.

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- To be considered complete, a work order must include all
  - SIR justified measures;
  - Incidental measures;
  - Health & safety measures
  - Miscellaneous measures
  - Optional measures

#### Evaluation/Recommendation

Satisfactory Audit – Michigan Energy Auditor

Additional Site Audit Needed (equipment failed or test aborted)

Unsatisfactory Audit – Failed (scored less than passing score and/or missed gated items)

An Energy Auditor candidate will pass the Energy Auditor skills assessment with a passing score or greater AND satisfactory completion gated items.

The scoring criteria and list of gated items is available upon request and ahead of any Energy Auditor exam from BCAEO at MDHHS-MiTEC@Michigan.gov.

#### Release of Test Results to Sponsoring Agency

The sponsoring agency can obtain scoring information from the BCAEO only if the Energy Auditor/QC Inspector candidate has signed a release form. An example of a release statement is included as Attachment D.

#### Re-Test

If the candidate fails the test, a request to re-test will only be approved after three months or if the candidate has demonstrated that he/she has obtained additional training and/or skill in the area(s) of deficiency.

#### SOM Certification Documentation

Those who qualify for certification by passing all required training and testing will be issued certification via an emailed notice from BCAEO technical staff. A copy of the Energy Auditor/QC inspector certification documentation must be maintained by the sponsoring grantee.

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## **Energy Auditor Decertification/QC inspector Suspension**

The BCAEO may revoke, modify, condition, refuse to renew, or temporarily suspend, the certification of an Energy auditor and temporarily suspend a QC inspector from conducting final inspections for the SOM Weatherization program if the Energy auditor/QC inspector violates program policy. Definition of violations are listed by level below.

### Level One Violations

Level One violations typically are defined as minor in nature. These types of violations will be reprimanded with a written warning to the certified Energy Auditor/QC Inspector that explains the violation along with the corrective action.

Level One Violations include when the Energy auditor/QC inspector does any one or more of the following:

1. Fails or refuses without good cause to exercise reasonable diligence in developing a home inspection report, preparing a report, or communicating a report; or
2. Fails to perform work or improvement to a residence upon which the Energy Auditor/QC Inspector performed a home inspection within the previous 12 months.

### Level Two Violations

Level Two violations typically are defined as major in nature or repeated violations and/or the lack of corrective action for minor violations. These types of violations will be reprimanded with a written warning to the certified Energy Auditor/QC Inspector that explains the violation along with the corrective action. The Energy Auditor/QC Inspector is required to submit proof of corrective action in writing that the violation has been corrected. The warning and written response will become part of the record in the person's file. The review of the response and corrective action will be conducted to determine, if the person will be suspended or temporarily suspended.

Level Two Violations include when the Energy auditor/QC inspector does any one or more of the following:

1. Is responsible for citation of repeated findings in consecutive monitoring reports, fails to correct minor violations as identified in level one/written warnings/reprimands; or
2. Commits an act or acts of malpractice, gross negligence, or incompetence in the performance of home inspections.

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### Level Three Violations

Level Three violations are defined as a serious violation that may result in the termination of the certification. The violation must be well documented and supported with proof the violation occurred by the Energy Auditor/QC Inspector. A written notice of the violation and the appeal date will be given to the certified Energy Auditor/QC Inspector. A formal hearing will be conducted within 30 business days of the receipt of the appeal request. The panel will inform the appeals applicant in writing of its decision.

Level Three Violations include when the Energy auditor/QC inspector does any one or more of the following:

1. Commits fraud or deceit with respect to any required license or permit application or an inspection report submitted to the Grantee or BCAEO;
2. Violates any state or federal law, rule, permit, or order relating to the inspection and/or installation of weatherization measures;
3. Makes a false or misleading statement in that portion of a written report that deals with professional qualification or in any testimony concerning professional qualifications;
4. Engages in an act or omission involving dishonesty, fraud, or misrepresentation with the intent to substantially benefit a home Energy auditor/QC inspector or other person or with the intent to substantially injure another person;
5. Engages in an act of fraud, misrepresentation, or deceit in the making of a home inspection;
6. Pays a finder's fee or a referral fee to a person in connection with an inspection of, or work to be done on, a residence;
7. Accepts a home inspection assignment when the employment itself is contingent upon the home;
8. Energy Auditor/QC Inspector reporting a predetermined estimate, analysis, or opinion or when the fee to be paid is contingent upon the opinion, the conclusions, analysis, or report reached or upon the consequences resulting from the assignment;
9. Employs fraud, deceit, or misrepresentation in obtaining or attempting to obtain a license or renewal of a license including builder, mechanical, plumber, electrician, and maintenance and alteration licenses such as mobile home, insulator, window installer, etc.;
10. Practices as a licensed home Energy auditor/QC inspector without a current SOM Energy Auditor/QC Inspector certification; or

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11. Any other level 3 violation.

### Notice

If the BCAEO revokes, modifies, conditions, refuses to renew, or suspends a certification, it shall inform the Energy Auditor/QC Inspector in writing of the reason for the action and shall include a copy of the appeals procedure. All appeals must be submitted in writing to the Director of Bureau of Community Action and Economic Opportunity, Michigan Department of Health & Human Services at:

Bureau of Community Action and Economic Opportunity  
235 S. Grand Ave. Suite 204  
PO Box 30037  
Lansing, MI 48909

Energy Auditors/QC Inspectors have 20 business days from the date of notification to appeal the action.

### Appeals Process

The Energy Auditor/QC Inspector may request a hearing before the Energy Auditor/QC Inspector Certification Appeals Panel. Panel members will be appointed within 10 work days of the receipt of the appeal request. The panel will consist of:

- One DHS Bureau staff, appointed by the BCAEO Director;
- Two Local Weatherization Operators, appointed by the Michigan Community Action Agency Association (MCAAA) Weatherization Committee Chair;
- One CAA Executive Director, appointed by the Michigan Community Action Agency Association (MCAAA) Executive Director, and
- One member of the Commission on Community Action and Economic Opportunity; appointed by the Commission Chair.

A formal hearing will be conducted within 30 business days of the receipt of the appeal request. The panel will inform the appeals applicant in writing of its decision.

### Panel Review Process

The review process will include the following elements:

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#### Convening of the panel

- Panel members will select a panel spokesperson. Panel will review any written documents submitted to date.

#### Presentation

- BCAEO staff will present a summary regarding reason(s) for the recommended action. This summary may be presented to the panel in writing, in person, or via electronic communication.
- Appellant will be given an opportunity to present a summary regarding reason(s) that BCAEO decision is not appropriate and supporting documentation as applicable. This summary may be presented to the panel in writing, in person, or via electronic communication.
- Panel members will communicate any points of clarification needed with the parties.

#### Deliberation and Decision

- The panel will review summary presentations, documentation and clarifications provided and render a decision.
- A decision based on simple majority will prevail.
- The panel spokesperson will communicate the panel's decision to the appellant and the BCAEO Director in writing.

#### Decertification Period

Revocation of an Energy Auditor or suspension of QC Inspector's performing audits for the MI WAP program shall be for a minimum of 6 months from the date of notice of decertification, suspension, or of the appeals panel notice, whichever is later.

Decertified Energy Auditor or suspended QC Inspectors may request renewal of certification at the end of the decertification period. The decertified Energy Auditor/QC Inspector must have a network grantee agency sponsor this request. The decertified Energy Auditor or suspended QC Inspector must attend IREC accredited Energy Auditor or QC Inspector training and recertification training and testing prior to reinstatement of work.

In the event of a QC Inspector suspension, a letter outlining the suspension will be provided to Michigan Weatherization Policy Advisory Council, Department of Energy and Michigan Community Action.

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## 618.2 – JOB TASK ANALYSIS (JTA)

### REFERENCES

- State of Michigan DOE State Plan
- Michigan Weatherization Field Guide
- Community Services Policy Manual
- Weatherization Program notice 15-4
- WAP Memorandum 034
- Standard Work Specifications for Home Energy Upgrades for Single Family, Manufactured Housing, and Multifamily homes
- IREC ISO 17024 Accreditation Program for Energy Efficiency Training Programs
- National Renewable Energy Laboratory Job Task Analysis
- U.S. Department of Energy WAP Training and Technical Assistance Clearing House

### PURPOSE

The backbone of the accreditation process is the Job Task Analyses (JTAs). The JTAs for Single-Family Home Energy Upgrades reflect the four most common job classifications in the U.S. Department of Energy's Weatherization Assistance Program (WAP) and home energy upgrade industry, cataloguing the knowledge, skills, and abilities that a practitioner needs in order to perform a given job effectively and safely. The Single-Family JTAs are used by training providers to develop coursework that can be verified and accredited by a third-party organization. By being able to verify and accredit training programs based on these JTAs, a higher level of consistency and quality is now available within the industry.

A Job Task Analysis is a foundation for any valid credentialing program and helps identify the core knowledge areas, critical work functions, and/or skills typically found across a representative sampling of current practitioners or job incumbent workers. Empirical results from a job analysis provide examinees and the public with a valid, reliable, fair, and realistic assessment that reflects the skills, knowledge, and abilities required to competently perform a job.

### POLICY

#### Quality Control Inspector (QCI)

A QCI is a residential energy-efficiency expert who ensures the completion,



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appropriateness, and quality of energy upgrade work by conducting a methodical inspection of the building and performing safety and diagnostic tests.

#### Domains/Tasks

##### Domain 1: In-Process Evaluation

Task 1: Verify worker compliance with safety regulations

Task 2: Evaluate in-process work quality

Task 3: Verify on-site documentation

##### Domain II: Postwork Evaluation

Task 1: Verify installed measures and initial assessment details

Task 2: Evaluate installed measures for compliance with standards

##### Domain III: Project Compliance and Completion

Task 1: Confirm whether policy requirements have been satisfied

Detailed Job Task Analysis for Quality Control Inspection can be found at the U.S. Department of Energy website:

<https://www.nrel.gov/docs/fy18osti/70977.pdf>

### **Multifamily Quality Control Inspector**

The multifamily quality control inspector is a building performance specialist who inspects installed energy conservation measures in multifamily buildings by observing and measuring building systems and components and analyzing building performance data to verify that project requirements are met.

#### Multifamily Quality Control Inspector Duty Areas

- Reviewing Project Documents
- Developing Quality Control Plan
- Conducting Pre-Installation Site Visits
- Conducting Site Visits
- Reporting Quality Control Inspection Observations and Findings

Detailed Job Task Analysis for Multifamily Quality Control Inspector can be found on the U.S. Department of Energy website: <http://www.nrel.gov/docs/fy14osti/60537.pdf>

### **Energy Auditors (Single Family)**

The Energy Auditor is an experienced professional who evaluates the health and safety issues, durability, comfort, and energy use of a residential building. The Energy Auditor

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conducts advanced diagnostic tests, gathers and analyzes data, and creates models to draw conclusions and make recommendations to the client for improvement.

#### Domains/Tasks

Domain 1: Collection of Visual, Material, Dimensional, and Appliance Information about the Building for an Energy Audit

Task 1: Document energy consumption

Task 2: Document the building history

Task 3: Conduct a physical/visual inspection

Task 4: Collect health and safety data

Task 5: Collect appliance and base load information

Task 6: Identify a conditioned building enclosure

Task 7: Collect mechanical ventilation data

Task 8: Identify building insulation (attic, walls, and foundation/subspace)

Task 9: Collect attic data

Task 10: Collect wall data

Task 11: Collect window and door data

Task 12: Collect foundation/subspace data

Task 13: Collect roof data

Domain II: Diagnostic Testing of the Dwelling Unit for an Energy Audit

Task 1: Prepare the dwelling unit for the test(s)

Task 2: Test the electric appliances

Task 3: Conduct indoor air quality tests

Task 4: Determine the safety and efficiency of combustion appliances

Task 5: Determine air leakage of the building envelope

Task 6: Determine the performance of HVAC distribution

Domain III: Evaluation of Collected Energy Audit Data to Determine the Scope of Work

Task 1: Evaluate the health and safety data

Task 2: Evaluate the durability/structural integrity of the building

Task 3: Evaluate the HVAC system

Task 4: Evaluate the mechanical ventilation

Task 5: Evaluate energy use

Task 6: Evaluate the foundation/subspace

Task 7: Evaluate the walls

Task 8: Evaluate the attic

Task 9: Evaluate the doors and windows

Task 10: Use energy modeling software

Task 11: Generate the recommended work scope

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Detailed Job Task Analysis for Single Family Energy Auditor can be found on the U.S. Department of Energy website: <https://www.nrel.gov/docs/fy18osti/70985.pdf>

### **Multifamily Energy Auditor**

The multifamily energy auditor is a building science and energy efficiency specialist who assesses multifamily building systems, and collects and analyzes energy use and building performance data, to develop a plan for reducing operating costs, and enhancing building performance while increasing occupant quality of life.

#### **Multifamily Energy Auditor Duty Areas**

- Determining Scope of Energy Assessment
- Preparing for Site Visit
- Assessing Heating and Cooling System
- Assessing Building Enclosure
- Evaluating Lighting Conditions
- Assessing Indoor Air Quality and Ventilation System
- Assessing Additional Loads and Sources
- Assessing Domestic Hot Water Systems
- Developing an Energy Performance Plan
- Performing Post-Audit Activities

Detailed Job Task Analysis for Multifamily Energy Auditor can be found on the U.S. Department of Energy website: <http://www.nrel.gov/docs/fy14osti/60447.pdf>

### **Crew Leader (Single Family)**

A Crew Leader is responsible for supervising the retrofit activities specified in the scope of work. He or she is responsible for interacting with the client plus managing personnel and materials on the job site in a safe and effective manner. The Crew Leader is responsible for quality control, testing procedures, documentation, and conducting a final walk through to ensure that all work is completed in a satisfactory manner.

#### **Domains/Tasks**

Domain 1: Develop Plan to Execute Scope of Work

Task 1: Identify materials and staffing needs

Task 2: Prepare homeowner/occupants for the scope of work

Task 3: Determine readiness of the job site for the scope of work

Task 4: Identify work site safety hazards and inform crew of safety requirements

Domain 2: Prepare and Maintain Job Site

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Task 1: Locate and verify access to specific work areas  
 Task 2: Protect interior/exterior of house (e.g. with drop cloths, poly, Tyvek booties, pressurizations)  
 Task 3: Set up tools  
 Task 4: Set up materials  
 Task 5: Report out of scope preexisting conditions

#### Domain 3: Implement Scope of Work

Task 1: Identify and report potential combustible safety hazards.  
 Task 2: Install roof penetrations and weatherproofing  
 Task 3: Rough in mechanical ventilation systems  
 Task 4: Assist with mechanical systems upgrades  
 Task 5: Install air sealing measures  
 Task 6: Install or repair vapor retarders  
 Task 7: Install insulation  
 Task 8: Install windows and doors  
 Task 9: Install baseload measures  
 Task 10: Identify and report deviations from scope of work  
 Task 11: Clean all debris and work materials from the job site

#### Domain 4: Manage Project

Task 1: Conduct diagnostic testing  
 Task 2: Adjust scope of work as needed to reflect current conditions  
 Task 3: Post necessary paperwork, (e.g. permits, lead-based paint EPA requirements, historic preservation  
 Task 4: Monitor safety practices  
 Task 5: Maintain and document project progression, personnel control, and compliance

#### Domain 5: Finalize Job

Task 1: Verify that all components of the scope of work have been completed in compliance with required codes and standards.  
 Task 2: Complete all post-work documentation as required (e.g. materials, labor hours, photos, certified renovator signatures, information for inspectors)

Detailed Job Task Analysis for Crew Leader can be found on the U.S. Department of Energy website at:  
<https://www.nrel.gov/docs/fy19osti/73578.pdf>

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### **Multifamily Building Operator**

A multifamily building operator efficiently operates and maintains building systems, addresses tenant concerns, improves building performance, and complies with regulations to support a comfortable, healthy, and safe living environment.

#### **Multifamily Building Operator Duty Areas**

- Facilitating Stakeholder Communication
- Monitoring Current Building Performance
- Operating and Maintaining Building Systems
- Ensuring Regulatory Compliance
- Improving Health and Safety
- Improving Building Performance

Detailed Job Task Analysis for Multifamily Building Operator can be found on the U.S. Department of Energy website: <http://www.nrel.gov/docs/fy14osti/60536.pdf>

### **Retrofit Installer (Single Family)**

A Retrofit Installer/Technician installs energy-efficiency measures to single family or 2-4 unit-homes using a variety of building science best practices to improve, safety, comfort, durability, indoor air quality, and energy efficiency. Knowledge, skills, and abilities for a retrofit installer are contained in the Crew Leader JTA, "Domain 3: Implement Scope of Work". See below:

#### **Domains/Tasks**

##### **Domain 3: Implement Scope of Work**

Task 1: Identify and report potential combustible safety hazards.

Task 2: Install roof penetrations and weatherproofing

Task 3: Rough in mechanical ventilation systems

Task 4: Assist with mechanical systems upgrades

Task 5: Install air sealing measures

Task 6: Install or repair vapor retarders

Task 7: Install insulation

Task 8: Install windows and doors

Task 9: Install baseload measures

Task 10: Identify and report deviations from scope of work

Task 11: Clean all debris and work materials from the job site

Detailed Job Task Analysis can found contained in the Crew Leader JTA, "Domain 3: Implement Scope of Work" on the U.S. Department of Energy website:

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<https://www.nrel.gov/docs/fy19osti/73578.pdf>

### **Multifamily Retrofit Project Manager**

Multifamily retrofit project managers direct and assure the successful completion of the building performance assessment, work scope development, and installation of conservation measures to reduce operating costs and achieve energy savings while ensuring the health and environmental safety of the building occupants.

#### **Multifamily Retrofit Project Manager Duty Areas**

- Assessing Project Viability
- Overseeing Building Performance Assessment
- Negotiating Statement of Work
- Procuring Installation
- Monitoring Construction
- Confirming Project Completion

Detailed Job Task Analysis for the multifamily Retrofit Project Manager can be found on the U.S. Department of Energy website: <http://www.nrel.gov/docs/fy14osti/60446.pdf>

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## 619 – STATE HISTORIC PRESERVATION OFFICE (SHPO) REVIEW

### REFERENCES

- National Historic Preservation Act (16 USC 470F)
- 36 CFR Part 800.14
- 36 CFR Part 800 (Section 106)
- Department of Energy (DOE) Weatherization Program Notice 10-12 (including attachments), 18-1

### PURPOSE

Section 106 of the National Historic Preservation Act (NHPA) applies to DOE funded activities. Grantees shall avoid taking any action that results in an adverse effect to historic properties pending compliance with Section 106.

On August 28, 2009, the United States Department of Energy (DOE) sent a Memorandum to all state and tribal historic preservation offices to formalize the role of recipients of grant awards (“EERE Applicants”) under the DOE under the Energy Efficiency and Conservation Block Grant (EECBG) program, the State Energy Program (SEP”) and Weatherization Assistance Program (WAP) in the Section 106 process.

This item serves to establish policy and procedures for administering WAP funded by DOE and in compliance with the parties’ respective responsibilities under Section 106.

The DOE Contracting Officer will consider the Grantee in compliance with Section 106 of the NHPA only after the Grantee has submitted adequate background documentation to the State Historic Preservation Office (SHPO) for its review. The SHPO has to provide written concurrence to the Grantee that it does not object to its Section 106 finding or determination. The Grantee shall provide a copy of this concurrence to the DOE Contracting Officer.

The Michigan SHPO Programmatic Agreement (PA) has been extended until December 2025. This PA outlines the terms of the Section 106 review process in Weatherization jobs.

### POLICY

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The following process shall be used to determine whether a SHPO review is mandatory, and if so, how to request Section 106 reviews for projects funded under the WAP program.

#### Required Section 106 SHPO Review

Section 106 reviews must be considered for any weatherization work on:

- Units 50 years of age or older at the time the work takes place;
- Units that are historic properties;
- Units that are in a designated historic area.

For units meeting any of the above criteria, the Grantee must refer to the Exemption Guide in Attachment A to determine whether a SHPO review is required. Use the DOE WAP Historic Preservation Checklist to document the review of each unit.

For any unit that meets the criteria listed in the “Required Section 106” above, review the list to determine whether measures to be installed fall under the general exemptions or meet the conditions for exterior or interior exemptions. If so, **no SHPO consultation is required** and the Grantee may proceed with weatherization work on that unit.

#### Exemption Guide

The Programmatic Agreement includes an Exemption Guide (Attachment A) with guidance in working with SHPO. This guide includes:

- A list of general exemptions for activities that do not require consultation with the SHPO.
- A list of exterior work that does not require consultation if certain described conditions are met.
- A list of interior work that does not require consultation if certain described conditions are met.
- A list of activities that always require SHPO consultation.

For any unit that meets the criteria above, review the list to determine whether measures to be installed fall under the general exemptions or meet the conditions for exterior or interior exemptions. If so, **no SHPO consultation is required** and the Grantee may proceed with weatherization work on that unit.

#### Initiating a SHPO Review



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Grantee must ensure that all weatherization activities not included in the list of categorical exclusion activities in Section 2.8 of WPN 21-1 is submitted to [MDHHS-BCAEO@michigan.gov](mailto:MDHHS-BCAEO@michigan.gov) to process an environmental review submission according to the [National Environment Policy Act of 1969](#).

For all other situations, the Grantee shall provide information regarding the property to SHPO to initiate a review. Reviews may be requested electronically or by mail.

**Note:** The Section 106 SHPO review process must be completed prior to the start of weatherization activities.

### Electronic Submission

Electronic submission of the SHPO review request is initiated at the following website:  
<http://housing.state.mi.us/weatherization/>

The Grantee enters the property address, identifies the appropriate building materials and uploads a photograph of the property. After all of the required information has been entered, the Grantee can submit the request electronically to the SHPO database. The Grantee can log into the database at any time to track the status of all review requests that have been submitted by the Grantee.

### Mail Submission

If the Grantee does not submit the review requests electronically, the following must be sent to SHPO:

- The completed *State Historic Preservation Office of Michigan Housing Rehabilitation Inventory Card*
- GPS MAP
- Photograph
- Completed identification information section of the *State Historic Preservation Office of Michigan Historic Significance Response Sheet*

To obtain the *State Historic Preservation Office of Michigan Housing Rehabilitation Inventory Card* or the *State Historic Preservation Office of Michigan Historic Significance Response Sheet*, contact the State Historic Preservation Office at the address or phone number below.

Submit all review documents to the following address:

attn: DOE Weatherization Assistance Program

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State Historic Preservation Office  
 Michigan State Housing Development Authority  
 735 E. Michigan Avenue  
 Lansing, MI 48912-1474

Phone: 517-373-1630  
 email: [ER@michigan.gov](mailto:ER@michigan.gov)

### **Neighborhood Reviews**

Grantees may submit requests for the review of entire neighborhoods to be considered excluded from the historic preservation review. This type of request must include the following information:

- Description of the neighborhood including all borders
- Dates of construction of sample houses
- MAP of neighborhood
- Digital photos of neighborhood houses (5-6 houses)
- Digital photos of streetscapes
- Cover letter indicating planned activities

Submit these requests for review to the address listed above and indicate this is a NEIGHBORHOOD REVIEW REQUEST.

If all materials are submitted, response time can vary. Response time is usually less for electronic submissions. Keep a copy of the response in the client file.

### **Client File Documentation**

For any unit that meets the criteria listed in the Required Section 106 SHPO review, a DOE WAP Historic Preservation Checklist must be completed and retained in the client file.

For any unit that requires a Section 106 SHPO review, the completed *State Historic Preservation Office of Michigan Historic Significance Response Sheet* must also be retained in the client file.

### **Monitoring**

Grantees may be monitored by the SHPO for compliance with this guidance. Agencies should therefore retain adequate records of compliance for all projects subject to this

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guidance, including before and after photographs of buildings/work subject to these exemptions as well as detailed specifications of the work conducted.

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## 621 – TERMINATION OR REDUCTION IN FUNDING

### REFERENCES

- PA 230 of 1981, as amended, being MCL 400.1101 et seq.
- 10 CFR §440.10 and 440.15 Weatherization Assistance Program for Low-Income Persons- Final Rule
- The Weatherization Assistance for Low-Income Persons Act, 42 U.S.C. 6861 et seq., as amended.

### PURPOSE

To establish policy and procedures for program termination or reduction in funding under the Weatherization Program.

- 10 CFR §440.10 states:  
“(f) DOE may reduce the program allocation for a state by the amount DOE determines cannot be reasonably expended by a grantee to weatherize dwelling units during the budget period for which financial assistance is to be awarded.”
- 10 CFR §440.15 states:  
“A State may terminate financial assistance under a subgrant agreement for a grant period only in accordance with established State procedures that provide to the subgrantee appropriate notice of the State’s reasons for termination and afford the subgrantee an adequate opportunity to be heard.”

**Note:** Michigan’s eligible Grantees are listed as Subgrantees or Local Weatherization Operators in Michigan’s DOE State plan each year.

### POLICY

#### Expansion of Network

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MDHHS-BCAEO reserves the right to schedule a bid sooner than the expiration of the previous Invitation to Bid in order to expand statewide weatherization operational capacity, to provide a statewide weatherization solution for contractor shortages, and/or to meet demands of multifamily weatherization jobs.

### **Cause for Reduction of Funding- Statewide Redistribution of Funds**

Department of Health & Human Services (DHHS) may do a statewide redistribution of weatherization funds in response to any of the following:

1. A review of each Grantee's spending and production resulting in the need to adjust Grantee allocations to maximize the number of homes weatherized in Michigan.
2. The results of the most recently available census or other appropriate data.
3. Notification of funding decreases by the funding source.
4. An agency's inability to meet work quality standards (SWS and Michigan Field Guide).

The US Department of Energy encourages state offices to reallocate funds at least every quarter to those high performing Grantees that demonstrate a commitment to meeting/exceeding quarterly production and spending targets.

### **Cause for Termination of Funding**

A rating of "high risk" in the weatherization portion of the assessment (scores 1 STAR or 2 STARs) for two consecutive years on the annual STAR Assessment performed by MDHHS-BCAEO, may result in contract termination and a competitive proposal process for the subgrantee's territory after the current contract expires.

OR

1. If DHHS determines that insufficient progress is being made to bring resolution to issues of non-compliance, DHHS will formally designate program deficiencies.

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DHHS will send a letter to the Grantee Executive Director and Board of Directors notifying them that DHS has formally designated one or more program deficiencies within their agency.

At the point program deficiencies are designated, a Quality Improvement Plan (QIP) may be required.

If DHHS determines (taking into account the seriousness of the deficiency and the time reasonably required to correct the deficiency) that a QIP is not appropriate, DHHS will send a letter to the Grantee Executive Director and Board of Directors notifying them of the reasons that the Grantee will not be allowed to implement a QIP

2. If a QIP is required, the Grantee will have 60 calendar days to submit their QIP to DHHS.
3. Within 30 calendar days of receipt, DHHS will approve the QIP or specify in writing the reasons why the QIP is unacceptable.
4. DHHS will make reasonable efforts to provide training and technical assistance to the Grantee for purposes of implementing the QIP.
5. In order to ensure services are being provided to clients, DHHS reserves the right to find an interim provider to service an area if a Grantee QIP implementation will take a significant amount of the grant period.
6. If the QIP continues to be unacceptable after 30 days, or if at any point DHHS determines that insufficient progress is being made to correct deficiencies, DHHS may proceed to program termination.
7. DHHS will notify the Grantee Executive Director, Weatherization Program Coordinator, and Board of Directors, if applicable, in writing of its decision to terminate the weatherization program at least 30 days prior to the effective date of the termination.

In the event that an area is unserved, the MDHHS-BCAEO reserves the right to designate a provider for the service area until another Invitation to Bid is posted.

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## APPEALS

- A Grantee may appeal a DHHS decision related to a QIP, or the initiation of program termination procedures by submitting a written statement describing the reason for the appeal.
- Written appeals must be submitted no later than 14 calendar days after the Grantee receives notification of the DHHS decision in question.
- Appeals must be submitted to the Director of the Department of Health & Human Services at the address below:

Department of Health & Human Services  
 235 South Grand Avenue  
 PO Box 30037  
 Lansing, MI 48909

- At the discretion of the DHHS Director, a meeting may be called or other action may be taken in an attempt to come to resolve the appeal.
- The decision of the DHHS Director to accept or reject an appeal is final.
- The Grantee will be notified of the DHHS decision to accept or reject an appeal within 30 days of its receipt.

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## 622 – DOE SAVINGS TO INVESTMENT RATIO BUY-DOWN AND LEVERAGING

### REFERENCES

- CFR 440.21
- 58 FR 41, page 1216
- DOE Weatherization Program Notice 16-5, 16-8
- DOE WAP Memorandum 035
- Community Services Policy Manual 606.1

### PURPOSE

Per Department of Energy (DOE) Weatherization Memorandum 035:

“Definitions:

Buy Down – aligns with a private interest and the funding source retains the decision-making authority in identifying the building being selected for installation of the measure(s).

Leverage – aligns with the intention of supplementing the weatherization resources and the funding source does not identify specific buildings for the investment. For the purpose of WAP, funds that are considered “leveraged” indicates the funding source has transferred decision-making authority to the WAP agency to determine which buildings will receive the measure(s).”

### POLICY

Cumulative SIR:

For any job completed using DOE funding, the cumulative SIR of the total DOE investment must be 1.0 or greater. Health and Safety, including Lead Safe Work costs, are not included in the calculation of the cumulative SIR.

All energy related repair costs are used to determine the cumulative SIR. These include:



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- Incidental repair costs
- Optional weatherization measures costs
- Duct costs
- Attic venting costs
- Foundation venting costs

**NOTE:** For the purpose of meeting the SIR requirement by using other resources to reduce the investment in a material or measure, no federal resources or funds may be used to offset the total installation cost. This includes State designated funds which are actually federal-based funds such as LIHEAP, CDBG, etc., may not be used for this purpose. No exceptions will be granted to this provision.

**NOTE:** Subgrantees cannot use or request co-pay amounts from weatherization household members to buy-down measures.

Grantees will be required to complete a summary of all costs associated with the weatherization of the building, including any or all non-Federal resources to be used. This summary will become part of the building's customer file along with the inputs and results of both energy audits."

For WA 8.9/NEAT/MHEA audit instructions regarding this matter, see Community Services Policy Manual 606.1

### **Buy Down:**

Buy down is only available in multifamily dwellings (including small buildings with 2-4 units) because a contribution is required for a buy down to occur. The statutory change in 1990 to allow for requiring contributions from landlords was only discussed in the context of multifamily buildings. Therefore, since the Statute did not address allowing Grantees to require financial participation from owners of single family rental units (or owner occupied non-rental units), DOE does not allow contributions from single family rental owners (including owner-occupied non-rental units) (58 FR 41, page 1216) to contribute toward a buy down. In order for measures to qualify for the buy down, the package of measures, including the full cost (the pre-buy down cost) of the measure which is to be bought down, must have an SIR  $\geq 1.0$ , and the process outlined in WPN 16-5 must be followed.

- In the event there is a duplex where both units are renter-occupied, measures in both units are eligible for buy down if the package of measures at the pre-buy

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down cost has an  $SIR \geq 1.0$ .

- If the duplex has one side that is renter-occupied and the other side is owner-occupied, only the renter-occupied side of the building is eligible for the buy down. The building owner would not be able to fund any measures to be installed in the owner-occupied unit. The owner must contract for those measures independent of WAP.

DOE has not historically identified landlord contributions as leveraged funds because the funds have traditionally been attributed to the landlord's scope of work/building. DOE recognizes each agreement is different but, as a guiding principle, if the landlord agreement includes the installation of measures that do not have an  $SIR \geq 1.0$ , then the landlord contributions would follow the auditing process identified in WPN 16-5. As a reminder, in order for a measure to qualify for the buy down, the package of measures, including the full cost (the pre-buy down cost) of the measure which is to be bought down, must have an  $SIR \geq 1.0$ .

- In the event contributions are made by a landlord that exceeds the agreement and there is no stipulation the funds be expended on a specific building(s), then those funds would be considered leveraged funds and could follow the modified auditing approach below.

### **Leveraging:**

Leveraged resources, as interpreted by WAP are not designated for use in a specific residence. Rather, the funding source aims to achieve a certain objective and allows the receiving (WAP) agency to determine the individual recipient(s) of the measure(s) and it is the responsibility of the receiving agency to ensure the funding use aligns with the funding source's purpose (e.g., funds designated to purchase high efficiency furnaces; funds designated to purchase solar units at a discounted price to benefit low-income households; funds designated by a utility for measures but must be applied within the utility service area; etc.). Three important points:

- **Eligibility:** Leveraged funds and measures may be applied to single family dwellings as well as multifamily buildings. (Unlike buy down options which may only be applied to multifamily buildings.)
- **Environmental Credits/Attributes:** In instances where it is requested by the contributing party, DOE will allow the Grantee to yield DOE's share of environmental credits/attributes to the utility and/or funding source.
- **Modified Auditing Procedures:** If funds are leveraged and the funding source

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does not identify specific buildings but transfers decision-making authority to the agency to determine which buildings will receive the measure(s), DOE will allow agencies to simplify the auditing process and run the audit once with the leveraged cost included. In instances where the funds are being used to reduce the cost of a measure to meet the programs SIR requirement (e.g., furnaces or solar systems), agencies may enter the “discounted” cost for the measure into the audit tool (as if they were purchasing the item “on sale”), and document the discounted costs and funding sources in the file.

- This approach is appropriate only in cases where the measure being “discounted” remains the last measure in the package of measures being installed. Any instances wherein the measure isn’t last on the list, the audit should be reviewed on a case-by-case basis by BCAEO prior to implementation.
  - In the examples of high efficiency furnaces or solar units being made available at a discounted price to WAP, agencies would enter the actual cost incurred by WAP into the audit tool, not the full cost as required with a buy down.

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## 623 – DATA REQUESTS AND CONFIDENTIALITY

### REFERENCES

- Weatherization Program Notice 10-8, 18-1
- 2 CFR 200
- 5 U.S.C. 552 Freedom of Information Act
- Michigan Freedom of Information Act 442
- DOE Agreements
- LIHEAP Agreements

### PURPOSE

To ensure the confidentiality of Weatherization applicants and recipients confidential information. To provide guidance to Weatherization Grantees regarding inquiries for weatherization data, program data, and requests to participate in studies, surveys, and/or evaluations.

### POLICY

All Grantees of the Weatherization Assistance Program (WAP) must adhere to the following policy regarding client data.

The Bureau of Community Action & Economic Opportunity (BCAEO) adheres to the transparency requirements placed on these and other government financial assistance programs instituted by the federal government and state government. The BCAEO will work diligently with any state WAP or local weatherization provider to gather the required information and provide it to the requestor. However, the BCAEO must comply with all requirements of the Government to protect the privacy interests of individuals who participate in these financial assistance programs.

Per Weatherization Program Notice (WPN) 10-8: "Unless required by statute, Department of Energy (DOE) shall place no restrictions on recipients that limit public access to the records of recipients that are pertinent to an award, except when DOE can demonstrate that such records shall be kept confidential and would have been exempted from disclosure pursuant to the Freedom of Information Act (5 U.S.C. 552) if the records had belonged to DOE." DOE would be legally required, pursuant to 5 U.S.C. 552(b)(6), of the Freedom of Information Act, to keep confidential any specifically identifying information related to an individual's eligibility application for WAP, or the

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individual's participation in WAP, such as name, address, or income information. Thus, BCAEO and Grantees should extend that same protection to their client records for WAP. States may release information about recipients in the aggregate and which does not identify specific individuals. For example, information on the number of recipients in a county, city, or a zip code does not compromise the privacy of the recipients.

A Grantee can provide aggregate data, as defined in the paragraph above. The Grantee is responsible for ensuring the data is accurate and what has been reported to BCAEO.

Grantees may share pertinent information to subcontractors when a) use of a subcontractor is acceptable per the agreement language b) the disclosure is necessary or otherwise naturally occurs in connection with work that is within the subcontractor's scope of responsibility, and (C) the Grantee obligates the subcontractor in a written Agreement to maintain the state's confidential information in confidence. At the state's request, any employee of the Grantee and of any subcontractor having access or continued access to the state's confidential information may be required to execute an acknowledgment that the employee has been advised of the Grantee's and the subcontractor's obligations under this section and of the employee's obligation to the Grantee or subcontractor, as the case may be, to protect the confidential information from unauthorized use or disclosure

### **Data Requests/Data Sharing**

Data related to a Grantees Weatherization program is confidential. Sharing identifying information, when necessary, is acceptable between the Grantee and the BCAEO. If an agency receives a request for confidential data from entities or persons other than the State, the Grantee must submit a request for approval to the state.

### **Participation in Weatherization Related Evaluations, Studies, and Surveys**

All requests to participate in Weatherization related Evaluations, Studies, and Surveys must be submitted for approval to BCAEO. BCAEO will review with the DOE to ensure there is not a breach of confidentiality. Additionally, BCAEO will determine if the study is relevant to the intent of the Weatherization Assistance Program.

Grantees that receive a request to participate in an activity outlined above, the Grantee should obtain the following information before submitting to BCAEO:

- All interested parties involved in activity
- Purpose/Hypothesis of activity

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- Data that will be collected
- Estimated length of time to complete activity
- Method of Evaluation of Results
- Where results will be published and/or shared

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## 624 – DISASTER PLANNING AND RELIEF

### REFERENCES

- Weatherization Program Notice 12-7, 18-1
- 10 CFR 440
- DOE Agreements
- LIHEAP Agreements

### PURPOSE

To provide guidance on allowable activities using Department of Energy (DOE) Weatherization Assistance Program (WAP) resources to low income individuals and families in the event of disasters as declared by the President of the United States or the State of Michigan Governor.

### POLICY

All Grantees of the Weatherization Assistance Program (WAP) must adhere to the following policy if considering requesting weatherization funding toward disaster planning and relief.

Disaster relief funds are to be used only in the event of a declared emergency at the state or federal level and shall be used only to provide emergency services to low income individuals and families in the designated disaster area. WAP has a very limited role in any disaster response plan. DOE funds are very limited to eligible weatherization activities and the purchase and delivery of weatherization materials.

To the extent services are in support of eligible weatherization (or permissible reweatherization) work for eligible households, such expenditure is allowable.

Allowable expenditures under WAP include:

- The cost of incidental repairs to an eligible dwelling unit if such repairs are necessary to make the installation of weatherization materials effective.
- The cost of eliminating health and safety hazards, elimination of which is necessary before the installation of weatherization materials.
- Weatherization personnel can be paid from DOE funds to perform functions related to protecting the DOE investment. Such activities include: securing weatherization materials, tools, equipment, weatherization vehicles, or protection

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of local agency weatherization files, records and the like during the initial phase of the disaster response.

- Local agencies may use weatherization vehicles and/or equipment to help assist in disaster relief provided the WAP is reimbursed according to the DOE regulations.

The use of DOE funds for relief efforts is limited to the following:

- The total allowance for relief efforts limited to allowance of \$6,500 per dwelling unit.
- The total allowance for incidental repairs in support of installation of weatherization materials is limited to the current maximum reimbursement for minor envelope repairs per contract and policy language.
- The total allowance for installation of each weatherization measure if limited to the current maximum reimbursement Grantee contract.

To the extent that the services are in support of eligible weatherization (or permissible re-weatherization) work, such expenditure would be allowable. For example, debris removal at a dwelling unit so that the unit can be weatherized would be an allowable cost. Debris removal from a dwelling unit that is not to be weatherized would not be an allowable cost. As such, *using DOE funds to pay for weatherization personnel to perform relief work in the community as a result of a disaster is not allowable.*

### **Reprioritization of Weatherization requests**

For reprioritization of weatherization requests coming from the disaster area, WAP rules require that priority be given to identifying and providing weatherization assistance to elderly persons, persons with disabilities, families with children, high residential energy users, and households with high energy burdens (10 CFR 440.16(b)). However, it would be permissible to consider households located in the disaster area a priority as long as the households are eligible and meet one of the priorities established in regulation and are free and clear of any insurance claim or other form of compensation resulting from damage incurred from the disaster.

### **Reweatherization work**

In the event of a declared federal or state disaster, weatherization crews may return to a unit reported as a completion to DOE that has been “damaged by fire, flood, or act of God, to be re-weatherized, without regard to the date of weatherization”. 10 CFR 440.18(f)(2)(ii). Local authorities must deem the dwelling unit(s) salvageable as well as



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habitable and the damage to the materials is not covered by insurance or other form of compensation.

### **Grantee Requests for Disaster Relief Funds**

If funding is available, BCAEO will consider all requests from Grantees for disaster relief funds that meet the outlined criteria. The requests must include the following components:

- Overview of disaster
- Date disaster was declared a federal or state disaster
- Additional funding requested, if applicable
- How weatherization funds/weatherization work will be utilized to enhance disaster relief funds in the federal or state defined disaster area.

Grantees must submit requests to the MDHHS-BCAEO@michigan.gov mailbox. Once submitted, BCAEO will review with the assistance of the DOE.

### **Funding for Disaster Planning and Relief**

If BCAEO approves a Grantee disaster relief plan, an agency can dedicate current year allocation and funding to the identified disaster area and serve that area as priority over other areas.

In the event the Grantee requests additional funding for the disaster relief efforts, BCAEO, with the approval of DOE via the state plan, reserves the right to allocate additional funds to a designated disaster site if the state.

## Attachment to 606.1 – NEAT / MHEA Steady State Efficiency (SSE) Data Input

**Purpose:** For use in modifying the measured or nameplate steady-state efficiency (SSE) of existing gas-fired space heating equipment before entering it into NEAT and MHEA.

Currently, measured or nameplate values are entered in the audit software for older, existing gas furnaces. NEAT/MHEA takes SSE and converts it to estimate Annual Fuel Utilization Efficiency (AFUE), which is how newer equipment is rated. The software uses this to assess the savings potential of a furnace replacement. The current software process does not convert the SSE of older gas-fired furnaces to a realistic estimated AFUE. The following will allow for a more accurate analysis.

### Criteria:

- In site-built homes – **only** draft hood equipped gas furnaces
- In mobile homes – **only** standard low efficiency (no draft inducer fan) gas furnaces
- Must be standing pilot
- No vent damper
- Cannot be used in conjunction with the Part Load Reduction Factor for oversized equipment

### NEAT Formula:

In NEAT, under the “Heating” tab, there will be a section called “Gas Furnace Details”. In the box titled “Steady State Efficiency”, input an efficiency for the existing unit based on the following formula:

$$(\text{Measured SSE OR nameplate efficiency} \times .80) / .95 = \text{SSE entered in NEAT}$$

Meas/Calc %	72	73	74	75	76	77	78	79	80
NEAT input	60.6	61.5	62.3	63.2	64	64.8	65.7	66.5	67.4

### MHEA Formula:

In MHEA, under the “Heating” tab, there will be a sub-tab labeled “Primary”. Select “AFUE” in the box titled “Efficiency Units”. In the box titled “Efficiency”, input an efficiency for the existing unit based on the following formula:

$$(\text{Measured SSE OR nameplate efficiency} \times .80) = \text{AFUE entered in MHEA}$$

Meas/Calc %	72	73	74	75	76	77	78	79	80
MHEA input	57.6	58.4	59.2	60	60.8	61.6	62.4	63.2	64

### Examples:

Existing equipment efficiency can be measured by a combustion analyzer (78% SSE for example) or calculated (nameplate states 90,000 Btuh input and 70,000 Btuh bonnet/output capacity – 70K divided by 90K = 78%)

NEAT: 78% measured or calculated on a draft hood furnace – you would input an SSE of 65.7% into NEAT

MHEA: 78% measured or calculated on a standard low-efficiency furnace – you would input an efficiency of 62.4% into MHEA after selecting “AFUE” in the “Efficiency Units” field

## Attachment to 606.1 – Michigan Candidate Measure Selection and Measure Lifetimes for WA 8.9

### *NEAT*

1.	Building Insulation	Attic insulation R-11	<input checked="" type="checkbox"/>	24*
2.	Building Insulation	Attic Insulation R-19	<input checked="" type="checkbox"/>	24*
3.	Building Insulation	Attic Insulation R-30	<input checked="" type="checkbox"/>	24*
4.	Building Insulation	Attic Insulation R-38	<input checked="" type="checkbox"/>	24*
5.	Building Insulation	Attic Insulation R-49	<input checked="" type="checkbox"/>	24*
6.	Building Insulation	Filling Ceiling Cavity	<input checked="" type="checkbox"/>	24*
7.	Building Insulation	Sillbox insulation	<input checked="" type="checkbox"/>	20
8.	Building Insulation	White roof coating	<input type="checkbox"/>	7
9.	Building Insulation	Foundation wall insulation	<input checked="" type="checkbox"/>	20
10.	Building Insulation	Floor insulation R-11	<input checked="" type="checkbox"/>	20
11.	Building Insulation	Floor insulation R-19	<input checked="" type="checkbox"/>	20
12.	Building Insulation	Floor insulation R-30	<input checked="" type="checkbox"/>	20
13.	Building Insulation	Floor insulation R-38	<input checked="" type="checkbox"/>	20
14.	Building Insulation	Wall insulation	<input checked="" type="checkbox"/>	24*
15.	Building Insulation	Kneewall insulation	<input checked="" type="checkbox"/>	24*
16.	Building Insulation	Duct insulation	<input checked="" type="checkbox"/>	20
17.	Doors and Windows	Window sealing	<input checked="" type="checkbox"/>	10
18.	Doors and Windows	Door Replacement	<input checked="" type="checkbox"/>	20
19.	Doors and Windows	Storm windows	<input checked="" type="checkbox"/>	15
20.	Doors and Windows	Window Replacement	<input checked="" type="checkbox"/>	20
21.	Doors and Windows	Low E windows	<input type="checkbox"/>	20
22.	Doors and Windows	Window shading (awning)	<input type="checkbox"/>	10
23.	Doors and Windows	Sun screen fabric	<input type="checkbox"/>	10
24.	Doors and Windows	Sun screen louvered	<input type="checkbox"/>	10
25.	Doors and Windows	Window film	<input type="checkbox"/>	15
26.	HVAC Systems	Thermal vent damper	<input type="checkbox"/>	10
27.	HVAC Systems	Electric vent damper	<input type="checkbox"/>	10
28.	HVAC Systems	IID	<input type="checkbox"/>	10
29.	HVAC Systems	Electric vent damper IID	<input checked="" type="checkbox"/>	10
30.	HVAC Systems	Flame retention burner	<input type="checkbox"/>	10
31.	HVAC Systems	Furnace tune up	<input checked="" type="checkbox"/>	3
32.	HVAC Systems	Replace heating system	<input checked="" type="checkbox"/>	18
33.	HVAC Systems	High efficiency furnace	<input checked="" type="checkbox"/>	18
34.	HVAC Systems	High efficiency boiler	<input checked="" type="checkbox"/>	20
35.	HVAC Systems	Smart Thermostat	<input checked="" type="checkbox"/>	15
36.	HVAC Systems	Tune up AC	<input type="checkbox"/>	3
37.	HVAC Systems	Replace AC	<input type="checkbox"/>	15
38.	HVAC Systems	Evaporative cooler	<input type="checkbox"/>	15

39.	HVAC Systems	Install/Replace heatpump	<input type="checkbox"/>	15
40.	Base Loads	Lighting retrofits	<input checked="" type="checkbox"/>	15
41.	Base Loads	Refrigerator replacement	<input checked="" type="checkbox"/>	15
42.	Base Loads	Water heater tank insulation	<input type="checkbox"/>	13
43.	Base Loads	Water heater pipe insulation	<input type="checkbox"/>	13
44.	Base Loads	Lo flow showerheads	<input type="checkbox"/>	15
45.	Base Loads	Water heater replacement	<input checked="" type="checkbox"/>	13

### ***MHEA***

1.	General Heat Waste	Seal Ducts	<input checked="" type="checkbox"/>	10
2.	General Heat Waste	General Air Sealing	<input checked="" type="checkbox"/>	10
3.	Building Insulation	Wall fiberglass batt insulation	<input checked="" type="checkbox"/>	24*
4.	Building Insulation	Wall fiberglass batt insl in Addition	<input checked="" type="checkbox"/>	20
5.	Building Insulation	Wall cellulose loose insl	<input type="checkbox"/>	24*
6.	Building Insulation	Wall cellulose insl loose in Addition	<input checked="" type="checkbox"/>	24*
7.	Building Insulation	Wall fiberglass loose insl	<input checked="" type="checkbox"/>	24*
8.	Building Insulation	Wall fiberglass loose in Addition	<input checked="" type="checkbox"/>	24*
9.	Building Insulation	Floor cellulose loose insl	<input type="checkbox"/>	20
10.	Building Insulation	Floor Cellulose loose insl in Addition	<input type="checkbox"/>	20
11.	Building Insulation	Floor fiberglass loose insl	<input checked="" type="checkbox"/>	20
12.	Building Insulation	Floor fiberglass loose insl in Addition	<input checked="" type="checkbox"/>	20
13.	Building Insulation	Roof cellulose loose insl	<input type="checkbox"/>	24*
14.	Building Insulation	Roof cellulose loose insl in Addition	<input checked="" type="checkbox"/>	24*
15.	Building Insulation	Roof fiberglass loos insl	<input checked="" type="checkbox"/>	24*
16.	Building Insulation	Roof fiberglass loose insl in Addition	<input checked="" type="checkbox"/>	24*
17.	Building Insulation	Add Skirting	<input type="checkbox"/>	10
18.	Building Insulation	Add skirting on Addition	<input type="checkbox"/>	7
19.	Building Insulation	White roof coating	<input type="checkbox"/>	7
20.	Building Insulation	White roof coating in Addition	<input type="checkbox"/>	7
21.	Doors and Windows	Replace marked doors (mandatory)	<input checked="" type="checkbox"/>	15
22.	Doors and Windows	Replace wooden doors	<input type="checkbox"/>	15
23.	Doors and Windows	Replace wooden doors in Addition	<input checked="" type="checkbox"/>	15
24.	Doors and Windows	Storm doors	<input checked="" type="checkbox"/>	10
25.	Doors and Windows	Storm doors in Addition	<input checked="" type="checkbox"/>	10
26.	Doors and Windows	Window sealing	<input checked="" type="checkbox"/>	10
27.	Doors and Windows	Window sealing in Addition	<input checked="" type="checkbox"/>	10
28.	Doors and Windows	Replace Single paned windows	<input checked="" type="checkbox"/>	20
29.	Doors and Windows	Replace single paned windows in Addition	<input checked="" type="checkbox"/>	20
30.	Doors and Windows	Plastic storm windows	<input checked="" type="checkbox"/>	5
31.	Doors and Windows	Plastic storm windows in Addition	<input checked="" type="checkbox"/>	5
32.	Doors and Windows	Glass storm windows	<input checked="" type="checkbox"/>	15
33.	Doors and Windows	Glass storm windows in Addition	<input checked="" type="checkbox"/>	15

34.	Doors and Windows	Add awnings	<input type="checkbox"/>	10
35.	Doors and Windows	Add awnings in Addition	<input type="checkbox"/>	15
36.	Doors and Windows	Add shade screens	<input type="checkbox"/>	10
37.	Doors and Windows	Add shade screens in Addition	<input type="checkbox"/>	10
38.	HVAC Systems	Setback thermostat	<input checked="" type="checkbox"/>	15
39.	HVAC Systems	Tune heating system	<input checked="" type="checkbox"/>	3
40.	HVAC Systems	Evaporative cooling	<input type="checkbox"/>	15
41.	HVAC Systems	Tune cooling system	<input type="checkbox"/>	3
42.	HVAC Systems	Replace dx cooling equipment	<input type="checkbox"/>	15
43.	Baseloads	Lighting Retrofits	<input checked="" type="checkbox"/>	15
44.	Baseloads	Refrigerator replacement	<input checked="" type="checkbox"/>	15
45.	Baseloads	Water heater tank insulation	<input type="checkbox"/>	13
46.	Baseloads	Water heater pipe insulation	<input type="checkbox"/>	13
47.	Baseloads	Low flow showerheads	<input type="checkbox"/>	15
48.	HVAC	Water heater replacement	<input checked="" type="checkbox"/>	13
49.	HVAC	Replace heating system	<input checked="" type="checkbox"/>	20

\* Enter 24-year lifetime when 30 year lifetime is desired to accommodate program limitations

**Attachment to 608 – U.S. Department of Housing and Urban  
Development Multifamily Certification of Income Eligibility for the  
Department of Energy's Weatherization Assistance Program**

Name of Property: \_\_\_\_\_ Property Address: \_\_\_\_\_

No. of Buildings on this Property: \_\_\_\_\_ No. of Total

Units: \_\_\_\_\_

I, \_\_\_\_\_ on behalf of \_\_\_\_\_  
the (owner/agent) for this property, do hereby certify that:

(1) I maintain certified income records for households residing at this property for the purposes of complying with one or more federal or state rental subsidy or tax credit programs.

(2) I have reviewed the current certified personal income records for households residing at this property;  
and

(3) Based on my review of the personal income records on file for the households residing at this property, a minimum of 66 percent of the units (or 50 percent in 2- and 4-unit buildings) in either \_\_\_all buildings or building nos. \_\_\_\_\_ (specify building nos. corresponding with accompanying spreadsheet) have certified personal incomes that do not exceed 200 percent annually of the current federal poverty level, based on household size.

I hereby attach supporting documentation for each building in the property as required by HUD to support the self-certification of this property or building as eligible for the Weatherization Assistance Program. I furthermore certify that all information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate.

**Disclaimer:** False claims and or statements are subject to full prosecution by HUD. Conviction of false claims and or statements may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Signature: \_\_\_\_\_

\_\_\_\_\_  
Printed Name Title

\_\_\_\_\_  
Phone No. E-mail

Date \_\_\_\_\_

This Form and the accompanying Multifamily Occupancy Report worksheet file may be emailed to [energyaction@hud.gov](mailto:energyaction@hud.gov); the Form may also be faxed to 202-708-0465.

## Attachment to 608.2 – Sample Landlord Agreement

### GRANTEE LETTERHEAD

This Agreement applies to buildings containing rental dwelling units, located in the State of Michigan. This Agreement is made and entered into by and between

(The Local Weatherization Operator)

(The Owner)

(Premises to be Weatherized)

WHEREAS, the Michigan Department of Health and Human Services is a state agency responsible for administering weatherization programs in Michigan in accordance with federal and state laws, and rules and regulations governing the programs; and

WHEREAS, the Michigan Department of Health and Human Services has contracted with The Local Weatherization Operator (LWO) to use said funds to make weatherization materials and weatherization labor available for benefit of eligible households; and

WHEREAS, many eligible households reside in rental housing in buildings containing rental dwelling units which may be weatherized if not less than 66 percent (50 percent for two and four-unit buildings) of the dwelling units in the premises are eligible dwelling units; and

WHEREAS, the eligible households residing in the dwelling units and buildings receiving weatherization assistance are the intended third-party beneficiaries of this Agreement;

NOW THEREFORE, in consideration of the foregoing premises, the parties agree as follows:

1. The Local Weatherization Operator agrees to provide certain weatherization program improvements to the premises of The Owner and occupied by the eligible household(s). Such improvements may include any or all of the measures identified from the energy audit.
2. In consideration for the weatherization improvements, The Owner does covenant and agree that the monthly rental fee of the premises, as shown on Exhibit A, shall not be increased for a period of twenty-four months beginning with the weatherization completion date. (Completion date is defined as the date of the final post-inspection.)

Exceptions:

- Rental increase can be fully justified due to significant increases in actual operating costs.

- Where rental fees are restricted under IRS Section 42, HUD, USDA Rural Development, or MSHDA program rules, rental fees may be increased to the extent allowed by such programs and shall be deemed to be unrelated to weatherization work.
3. The Owner agrees to maintain the weatherization materials installed under this Agreement, in accordance with all relevant codes regarding maintenance.
  4. The Owner agrees not to evict, terminate, or institute any court action for possession against any eligible dwelling unit tenant for the 12 months following the weatherization completion date, except for:
    - failure to pay rent;
    - violating the terms of the lease (other than to surrender possession upon proper notice);
    - causing substantial damage to the premises
    - permitting a nuisance;
    - carrying on unlawful business.
  5. The Owner agrees that the terms, premises, and obligations of this Agreement shall supersede and be superior to any inconsistent provision of any oral or written lease agreement affecting the rent collected for the eligible dwelling units identified in Exhibit A.
  6. The Owner agrees and consents to permit The Local Weatherization Operator and its employees to enter upon the premises for the purpose of making the weatherization improvements. The Local Weatherization Operator is granted the right to inspect the premises and to examine any heating fuel and utility charges and costs with respect to the premises. Representatives of the U.S. Department of Energy and the State are also granted the right to inspect the premises weatherized by The Local Weatherization Operator.
  7. The Owner hereby swears or affirms that the building(s) is not presently being offered for sale and further agrees to give the Local Weatherization Operator thirty days notification of the sale or conversion of the building. At least ten days prior to the sale or conversion the Owner agrees to obtain, in writing, the purchaser's consent to assume the Owner's obligations under this Agreement or, if this consent is not obtained, to pay the Local Weatherization Operator the full cost of weatherization pro-rated by the number of months left under this Agreement.
  8. The Owner agrees to provide the Local Weatherization Operator fuel consumption data for this building(s). The data will consist of the total electrical and home heating fuel consumption data for the 12 months prior to the weatherization application date and the 12 months immediately following the completion of the final post inspection. This data shall be supplied to the Local Weatherization Operator as soon as practicable after it is received by the Owner. In situations where the tenant is responsible for paying the electric and/or fuel bill, the Local Weatherization Operator should request this information from the tenant or utility company.



- Owner of existing refrigerator in this rental unit:    Property Owner/Landlord \_\_\_\_\_  
Eligible Household

11. In the event that The Owner increases the rent charged to an eligible household occupying an eligible dwelling unit, the occupant(s) of the eligible dwelling unit as third-party beneficiaries of the Agreement can assert any direct claims against The Owner in any action or special proceeding in any court of appropriate jurisdiction.
12. In the event that The Owner initiates any eviction, termination, and/or possession action on an eligible household occupying an eligible dwelling unit, the occupants of the eligible dwelling unit as third-party beneficiaries of the Agreement can assert any direct claims against The Owner in any action or special proceeding in any court of appropriate jurisdiction.
13. That for breach of this Agreement, damages, where not otherwise specified, may be awarded in accordance with applicable law.
14. The Local Weatherization Operator shall not be held responsible or liable in any way for the failure to provide work, labor, service, or materials provided for by the terms of this Agreement by reason of federal, state, or local requirements or regulations prohibiting the provision of such work, labor, service, or materials.
15. The Local Weatherization Operator shall provide a synopsis of the terms of this Agreement to the households occupying each eligible dwelling unit within 30 days of the date of the weatherization completion date of this Agreement. Further, The Local Weatherization Operator shall provide, or cause the owner to provide, a synopsis of the terms of this Agreement to subsequent households occupying each eligible dwelling unit and to the new and subsequent occupants of eligible dwelling units vacant as of the weatherization completion date of this Agreement.
16. The Local Weatherization Operator shall provide any occupant of an eligible dwelling unit access to this document in accordance with federal and state laws.
17. Exhibits A, B, and C shall be signed by both parties and become a part of this Agreement upon signing by both parties. In the event an exhibit cannot be completed at signing, provisions related to those exhibits shall not be considered binding until such times as they are completed, signed by both parties, and attached to this Agreement.
18. The provisions of this Agreement are severable. If any provision of this Agreement is found invalid, such finding shall not affect the validity of this Agreement as a whole or any part or provision hereof other than the provision so found to be invalid.

---

Signature of Owner or Authorized Representative

---

Date

---

Owner's Address

---

Signature of Local Weatherization Operator Representative

---

Date

The Local Weatherization Operator will not discriminate against any individual or group because of race, sex, religion, age, national origin, color, height, weight, marital status, disability, or political beliefs.
--

## Attachment to 608.2 – Sample Landlord Agreement – Exhibit A

### GRANTEE LETTERHEAD

#### ELIGIBLE DWELLING UNITS AND RENT

The documented eligible dwelling units, including those listed on Exhibit B, which are to be weatherized or caused to be weatherized by this agreement, and each unit's rent as of the date of weatherization completion are as follows:

<b><u>Address</u></b>	<b><u>Unit Number</u></b>	<b><u>Monthly Rent</u></b>

---

Signature of Owner or Authorized Representative

Date

---

Signature of Local Weatherization Operator Representative

Date

## Attachment to 608.2 – Sample Landlord Agreement – Exhibit B

### GRANTEE LETTERHEAD

#### DESIGNATED VACANT ELIGIBLE DWELLING UNITS

The designated vacant eligible dwelling units which are to be rented to or occupied by an eligible household within 180 days in cases of a federal, state, or local government program for rehabilitating or making similar improvements to the dwelling unit(s).

<b><u>Address</u></b>	<b><u>Unit Number</u></b>

---

Signature of Owner or Authorized Representative

Date

---

Signature of Local Weatherization Operator Representative

Date

## Attachment to 608.2 – Sample Landlord Agreement – Exhibit C

### GRANTEE LETTERHEAD

#### WORKSCOPE

The State of Michigan (SOM) approved audit shall be utilized to determine the appropriate measures for all single family and appropriate multi-family (four units or less) homes weatherized.

Measures that may be considered include the following:

- Health and Safety Measures
- Air Sealing/Duct Sealing/Repair/Replacement
- Duct Insulation
- Major Bypasses and Infiltration/Exfiltration
- Attic Insulation
- Knee wall insulation
- Wall insulation
- Compact Fluorescent Light Bulbs
- Band joist (“Sillbox”) Insulation
- Floor insulation
- Perimeter insulation
- Refrigerator replacement
- Domestic Hot Water Tank (DHW) Replacement
- Mechanical systems may be evaluated

Note: This listing is advisory and not exhaustive.

Multi-family homes with five or more units will be evaluated for appropriate measures by a DOE-approved audit subject to the approval by the Michigan Department of Health and Human Services.

---

Signature of Owner or Authorized Representative

Date

---

Signature of Local Weatherization Operator Representative

Date

## Attachment to 608.2 – Sample Landlord Agreement – Tenant Synopsis

### GRANTEE LETTERHEAD

#### TENANT'S SYNOPSIS OF THE PROVISIONS CONTAINED IN THE WEATHERIZATION LANDLORD AGREEMENT

The Michigan Department of Health and Human Services Weatherization Assistance Program provides funds to weatherize homes on income eligible households.

Your landlord has entered into an agreement with \_\_\_\_\_, a grantee of the Michigan Department of Health and Human Services, to have your building weatherized on your behalf. In return for this weatherization, your landlord has agreed to several provisions that benefit you and give you specific rights. You are called a third-party beneficiary of the Agreement. These provisions and rights are summarized for you below:

1. The landlord cannot raise your rent for twenty-four months from the date of the final inspection of the weatherization work activities, except in cases where the landlord can clearly show actual increases in property taxes, maintenance, and operating expenses, or other costs not directly related to the weatherization work. (Completion is defined as the date of the final post inspection.) However, if you live in a rent controlled or rent stabilized unit, the landlord may receive approval for normal rent increases.
2. If you happen to move out of your unit within the twenty-four month period, the landlord must charge the new tenant the same rent you are being charged.
3. If the owner or landlord sells your building within the twenty-four month period, the new owner must also comply with all provisions of the Agreement.
4. The landlord agreed not to institute any eviction, termination, or possession action against you for one year, unless you fail to fulfill your normal tenant responsibilities.
4. If your landlord tries to raise your rent within the twenty-four month period, you have the right to assert a claim against the landlord in court. If this happens and you need assistance in asserting your claim, call your local legal services office.
6. If the LWO has determined that your unit is eligible for a refrigerator replacement, the landlord agrees the replacement will be in accordance with program standards located in the Michigan Field Guide. The refrigerator being replaced must be surrendered without exception.

Ownership of the replacement refrigerator falls to whoever owns the refrigerator that is replaced, either the owner/occupant, property owner/landlord, or renter, as documented

below and on the Landlord Agreement. All refrigerators owned by the landlord that are replaced must remain in the rental unit occupied by the weatherization applicant.

Owner of existing refrigerator in this rental unit:

Owner/Occupant \_\_\_\_\_ Property Owner/Landlord \_\_\_\_\_ Renter \_\_\_\_\_

7. You have the right to see the Agreement signed by your landlord and the Local Weatherization Operator named above who weatherized your unit. You may use the Agreement document as evidence in court to prove your claim. To obtain a copy or see the agreement, you may contact the Local Weatherization Operator by telephone or write to the address as identified on this document.

This agreement shall be in effect for two years from the completion of the weatherization activities on the unit(s). (Completion is defined as the date of the final post-inspection.)

I verify that I have received a copy of this document.

---

(Tenant's Signature)

(Date)

## Attachment to 612 – Client File Forms

# HAZARD IDENTIFICATION AND NOTIFICATION

Weatherization achieves energy and cost savings and improved comfort, health and safety of homes through a variety of home retrofit measures. A Health and Safety Assessment must be performed to identify hazards in the home. When hazards are identified, appropriate testing must be performed when required by the Health and Safety Plan. If Inspector discovers a condition that, in his/her judgment, presents a risk of imminent threats to health or safety are observed during the course of the assessment and/or weatherization assistance program work, the Inspector will disclose that condition to the occupants, landlord, and property manager immediately. Such "occupants" may be renters whose health and safety may be at risk due to an identified hazard.

### Client Information:

Name:

Address:

Phone:

Agency

Name/Contact

Information:

### Hazard Identification: (List a clear description of the problem.)

Will the identified hazards lead to a deferral?

### Audit/Assessment/Testing: (List the testing completed and a summary of the results.)

Type of Audit/Test	Date of Audit/Test	Name of Inspector/Assessor/Auditor	Date Client was informed	Summary of Results
NEAT				

*Inspectors make sure that their general liability insurance and errors and omissions (E&O) insurance are at levels appropriate to cover their particular state's liability limits for injuries caused by their negligence or their failure to warn of a defect they discovered or should have discovered during the course of their inspection.*

Inspector Name: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

*I have carefully read this form and have signed it of my own free will. The client(s) signature(s) indicate that the client understands and have been informed of their rights and options.*

Client Name: \_\_\_\_\_

Client Signature: \_\_\_\_\_ Date: \_\_\_\_\_



**Pre-Renovation Form**  
**Confirmation of Receipt of Lead Pamphlet**  
**Michigan Department of Human Services**  
Effective until April 2010

AUTHORITY: 40 CFR PART 745 and Public Act 230 of 1981  
COMPLETION : Voluntary  
PENALTY: None

The Local Weatherization Agency will not discriminate against any individual or group because of race, sex, religion, age, national origin, color, marital status, political beliefs or disability. If you need help with reading, writing, hearing, etc., under the Americans with Disabilities Act, you are invited to make your needs known to a local Weatherization office serving your county.

- ☐ I have received a copy of the pamphlet, Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools informing me of the potential risk of the lead hazard exposure from renovation activity to be performed in my dwelling unit . I received this pamphlet before the work began.

\_\_\_\_\_  
Printed name of recipient

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of recipient

\_\_\_\_\_  
Date

Self-Certification Option (for tenant-occupied dwellings only) –

If the lead pamphlet was delivered but a tenant signature was not obtainable, you may check the appropriate box below.

- ☐ Refusal to sign – I certify that I have made a good faith effort to deliver the pamphlet, Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools, to the rental dwelling unit listed below at the date and time indicated and that the occupant refused to sign the confirmation of receipt. I further certify that I have left a copy of the pamphlet at the unit with the occupant.
- ☐ Unavailable for signature – I certify that I have made a good faith effort to deliver the pamphlet, Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools, to the rental dwelling unit listed below and that the occupant was unavailable to sign the confirmation of receipt. I further certify that I have left a copy of the pamphlet at the unit by sliding it under the door..

\_\_\_\_\_  
Printed name of person certifying

Lead pamphlet delivery

\_\_\_\_\_  
Attempted delivery date and time

lead pamphlet delivery

\_\_\_\_\_  
Signature of person certifying lead pamphlet delivery

\_\_\_\_\_  
Date

\_\_\_\_\_  
Unit Address

**Note Regarding Mailing Option**—As an alternative to delivery in person, you may mail the lead pamphlet to the owner and/or tenant. Pamphlet must be mailed at least 7 days before work begins. (Document this process in the case file with a certificate of mailing from the post office attached to a copy of the Agency's letter).

<b>WEATHERIZATION PROGRAM CLIENT INSPECTION/ASSESSMENT State of Michigan Department of Human Services</b>	Weatherization Agency Name:		
	Address (Street Number and Name):		
	City:	State: Michigan	Zip Code:
	Telephone Number: (       )		

Client Name:		Address of Home (Street Number and Name):	
City:	State: Michigan	Zip Code:	Job Number:

The services performed on your home were completed to the extent possible within the current available funding and program limitations. The services provided are free of charge. Please rate the performance of each task which was completed. Thank you for your cooperation.

WEATHERIZATION MEASURE Check Work Performed		CLIENT ASSESSMENT Good Fair Poor			WEATHERIZATION MEASURE Check Work Performed		CLIENT ASSESSMENT Good Fair Poor		
<input type="checkbox"/>	Health and Safety	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Band Joist Insulation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Major Bypasses	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Floor Insulation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Duct Sealing/Repair/Replacement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Perimeter Insulation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Duct Insulation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Refrigerator Replacement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Furnace Filter	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Water Heater Replacement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Attic Insulation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Furnace Replacement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Knee wall Insulation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Wall Insulation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Infiltration/Exfiltration	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	Compact Fluorescent Light Bulbs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

\*Please note that not all the above measures are installed on every home. The local weatherization agency makes final installation decisions after their pre-inspection and after reviewing total job costs and program limitations.

I understand that representatives of the state and federal government have the responsibility to monitor the performance of the weatherization agency. This means that the work performed to my dwelling may be inspected by representatives of those organizations.

By signature, I certify that the weatherization tasks were completed in my home and I have rated the weatherization crew's work performance.

Client's Signature:	Date:
Inspector's Signature:	Date:

Additional Comments:
----------------------

AUTHORITY: P.A. 230 OF 1991 COMPLETION: Required PENALTY: None	The Department of Human Services will not discriminate against any individual or group because of race, sex, religion, age, national origin, color, marital status, political beliefs or disability.
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DHS - 308 (Rev. 4/05) Previous edition obsolete.

# INFRARED SCAN REPORT WEATHERIZATION PROGRAM

State of Michigan  
Department of Human Services

Weatherization Agency Name

Job Number

Client Name

Address (Street Number and Name)

Contractor

City

State

Zip Code

Scan By

Date

Telephone Number

( )

## INTERIOR WALL ELEVATIONS (MAIN FLOOR)

## INTERIOR WALL ELEVATIONS (2ND FLOOR)

A.	H.	1.	4.
B.	I.	2.	5.
C.	J.	3.	6.
D.	K.	Draw Views of Structure (Main Floor Plan)	
E.	L.		
F.	M.	Draw Views of Structure (2nd Floor Plan)	
G.	N.		

### Symbols

BR -- Bedroom  
Room  
DR -- Dining Room  
B -- Bath  
KC -- Kitchen Cabinets  
KW -- Knee wall  
LD -- Low Density  
P -- Partition  
? -- Scan Unclear  
RA -- Return Air / Duct  
SL -- Sloped Ceiling  
ST -- Stairs  
V -- Void

LR -- Living  
K -- Kitchen  
C -- Closet  
FP -- Fireplace  
St -- Studs  
H -- Header  
W -- Window  
D -- Door

### Comments

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(Void Area \_\_\_\_\_ SF) ÷ (Total Wall Area \_\_\_\_\_ SF) = \_\_\_\_\_ % Void

Authority: PA 230 of 1981  
Completion: Required  
Penalty: None

The Department of Human Services will not discriminate against any individual or group because of race, sex, religion, age, national origin, color, marital status, political beliefs or disability.

<b>WEATHERIZATION PROGRAM</b> <b>NOTICE OF POTENTIALLY</b> <b>UNSAFE CONDITION</b> State of Michigan Department of Human Services	Weatherization Agency Name:		
	Address (Street Number and Name):		
	City:	State: Michigan	Zip Code:
	Telephone Number: (       )		

Client Name:		Address of Home (Street Number and Name):	
City:	State: Michigan	Zip Code:	Job Number:

Unsafe Condition: <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
--

Person(s) Notified (Client, Landlord, Owner, Third Party): <hr/> <hr/>
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Recommendations: <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
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Questions concerning "Lead" may be directed to the Environmental Protection Agency - LEAD HOTLINE: (800) 424-5323.

A copy of this notice was sent to all parties of interest listed above (a copy shall be retained in the client file)	Signature of Agency Representative:	Date:
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AUTHORITY: P.A. 230 OF 1981: COMPLETION: Required PENALTY: None	The Department of Human Services will not discriminate against any individual or group because of race, sex, religion, age, national origin, color, marital status, political beliefs or disability.
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<b>WEATHERIZATION PROGRAM</b> <b>NOTICE OF INDOOR</b> <b>AIR QUALITY CONCERN</b> <b>State of Michigan</b> <b>Department of Human Services</b>	Weatherization Agency Name:		
	Address (Street Number and Name):		
	City:	State: Michigan	Zip Code:
	Telephone Number: (       )		

Client Name:		Address of Home (Street Number and Name):	
City:	State: Michigan	Zip Code:	Job Number:

Indoor Air Quality Concern:

Person(s) Notified (Client, Landlord, Owner, Third Party):

Recommendations:

Further information relative to Indoor Air Quality concerns is available from the U.S. Consumer Product Safety Commission: Call (800) 638-2772 or write U.S. Consumer Product Safety Commission, Washington D.C. 20207.

A copy of this notice was sent to all parties of interest listed above (a copy shall be retained in the client file)	Signature of Agency Representative:	Date:
--	-------------------------------------	-------

AUTHORITY: P.A. 230 OF 1981: COMPLETION: Required PENALTY: None	The Department of Human Services will not discriminate against any individual or group because of race, sex, religion, age, national origin, color, marital status, political beliefs or disability.
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# WEATHERIZATION CHECKLIST FOR CLIENT/JOB FILE DOCUMENTATION

State of Michigan  
Department of Human Services

Job Number \_\_\_\_\_

Weatherization Agency Name		
Client Name		
Address (Street Number and Name)		
City	State	Rep. Initials

## I. CLIENT ELIGIBILITY (see CSPM for policies/forms)

<b>Yes/NA</b> <input type="checkbox"/> / <input type="checkbox"/> 1. Standard Application Form, DHS-4283 <input type="checkbox"/> / <input type="checkbox"/> 2. Income Eligibility Documentation and Calculations <input type="checkbox"/> / <input type="checkbox"/> 3. Home Ownership <input type="checkbox"/> / <input type="checkbox"/> 4. Landlord Agreement/Exhibits/Tenant Synopsis/ and Lease	<input type="checkbox"/> / <input type="checkbox"/> 5. Documentation of Landlord Contribution (if applicable) <input type="checkbox"/> / <input type="checkbox"/> 6. Priority Criteria Selection <input type="checkbox"/> / <input type="checkbox"/> 7. Documentation of Annual Heating and Electric Usage <input type="checkbox"/> / <input type="checkbox"/> 8. Written Notification of Eligibility/Ineligibility a. Notification of Job Scheduling b. Notification of Appeal Process
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## II. JOB-RELATED

<b>Yes/NA</b> <input type="checkbox"/> / <input type="checkbox"/> 1. Approved Audit <input type="checkbox"/> / <input type="checkbox"/> 2. 552 Health and Safety Assessment Findings <input type="checkbox"/> / <input type="checkbox"/> 3. 552A Release of Liability and Waiver of Claims <input type="checkbox"/> / <input type="checkbox"/> 4. NEAT Job Input Summary Report/NEAT Output Summary Report <input type="checkbox"/> / <input type="checkbox"/> 5. Confirmation of Receipt of Lead Pamphlet <input type="checkbox"/> / <input type="checkbox"/> 6. Client Energy Plan of Action <input type="checkbox"/> / <input type="checkbox"/> 7. Asbestos Notification Letter DHS -4290 <input type="checkbox"/> / <input type="checkbox"/> 8. Notice of Indoor Air Quality Concern DHS -4289 <input type="checkbox"/> / <input type="checkbox"/> 9. Notice of Potentially Unsafe Condition DHS -4288 <input type="checkbox"/> / <input type="checkbox"/> 10. Certificate of Insulation <input type="checkbox"/> / <input type="checkbox"/> 11. Contractor's Invoice <input type="checkbox"/> / <input type="checkbox"/> 12. Post-inspection Documentation/Corrections Approved <input type="checkbox"/> / <input type="checkbox"/> 13. Client Inspection/Assessment DHS -1008 <input type="checkbox"/> / <input type="checkbox"/> 14. Appliance Replacement/Disposal Documentation <input type="checkbox"/> / <input type="checkbox"/> 15. Permit(s) for Furnace or Water Heater Replacement <input type="checkbox"/> / <input type="checkbox"/> 16. Other _____ <input type="checkbox"/> / <input type="checkbox"/> 17. _____ <input type="checkbox"/> / <input type="checkbox"/> 18. _____	Authority: PA 230 of 1981 Completion: Optional Penalty: None DHS-4291 (Rev.11/09) previous editions obsolete	The Department of Human Services will not discriminate against any individual or group because of race, sex, religion, age, national origin, color, marital status, Political beliefs or disability.
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## Radon Informed Consent

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. These increases are smaller in manufactured housing everywhere, and all homes in low-radon potential counties, and higher in site-built homes in high-radon-potential counties. There is some evidence that the installation of continuous mechanical ventilation reduces radon levels in homes, and counteracts any radon increases that are due to improved building air tightness levels.

The following radon precautions will be implemented in all weatherized homes to reduce the possibility of exacerbating any potential radon issues:

- Whenever site conditions permit, exposed dirt floors within the pressure/thermal boundary will be covered.
- 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.

**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 informed consent form and have signed it of my own free will.**

---

Client Name Printed: \_\_\_\_\_

Client Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Energy Auditor Signature \_\_\_\_\_ Date: \_\_\_\_\_



## RELEASE OF LIABILITY AND WAIVER OF CLAIMS

Department of Human Services

AGENCY NAME

### Health and Safety Assessment

In addition to the energy audit we will do on your home, we will do a limited health and safety assessment of the home. The health and safety assessment will consist of a visual inspection for potential health and safety problems. You will be notified of any health and safety problems that are identified, including mold. However, the evaluator is not a qualified mold professional. Mold may be present in areas not accessible or seen during the visual inspection or during the actual work on your home. Work on your home will be performed in a manner to prevent future mold growth. Mold can be a problem in any home, but especially in those where there is an excessive amount of moisture or humidity present. In addition, if there are several people, pets, plants or fish aquariums present, conditions may exist for mold to grow. If there are existing conditions that are seen or unseen, we shall not be held responsible or liable. The agency and its contractors will be held harmless for any future moisture or mold problems that are not directly attributable to weatherization work.

### Weatherization Activities

**Notice:** During weatherization activities, particularly when insulation is being blown into wall cavities and attics, insulation dust, other types of dust, and other particles may become airborne. Additionally, unforeseen circumstances may result in some insulation leaking through cracks into the home's living space. In those circumstances where insulation leaks into the living space, we will be responsible for clean-up (repairing damage and cleaning up the living area). Minor construction dust is inevitable at the end of any remodeling work. Construction dust clean-up will be the responsibility of the home owner/occupant.

**Recommendation:** It is recommended that people with the following health conditions be out of the house when insulation is being blown into the house: Asthma, emphysema, allergies and other respiratory conditions, pregnancy and any serious health conditions such as decreased immune functions which might be aggravated by dust and other dust-like particles in the air. Furthermore, it is also recommended that infants less than 12 months old should be out of the house when insulation is being blown. Persons who leave the house during the insulation process should remain outside the house for at least 30 minutes after completion of insulation activities.

**Release of Waiver of Claims:** I acknowledge by my signature below receipt of the information and recommendations set out above. Additionally, I agree on behalf of myself and any minor children or others for whom I am responsible, to hold the agency and its agents harmless from any claims, medical problems or personal injuries that may occur, develop or worsen in response to the weatherization activities. This waiver is for all damages, direct or indirect, that may relate to weatherization activities, including money lost by not being able to work, healthcare costs and pain or suffering.

**I am aware the weatherization process may cause airborne particles, including dust, to be released in my home and that such airborne particles can aggravate health conditions. I have chosen to go forward with the weatherization process, accepting any and all risks of injury or damages.**

**I have carefully read this release and waiver and fully understand its contents. I am aware this is a release of liability and have signed it of my own free will.**

Client Name	Phone	Job File Number
Address	City/Zip	
Client Signature	Date	Agency Witness Date

Agency File (*always*)  
Copy – Client (*always*)

# MICHIGAN WEATHERIZATION PROGRAM HEALTH & SAFETY ASSESSMENT FINDINGS

Department of Human Services

AGENCY NAME

Client Name	Job Number
-------------	------------

Address	City, Zip
---------	-----------

**1. Moisture Areas** – Existing conditions (*check all that apply*)

- ☐ Actual construction defect or deterioration that allows water into the home (*roof, decks, windows, concrete slabs, moisture infiltration*)
- ☐ Evidence of conditions that might allow water in the home (*poor grading, bad flashing, bad/missing gutters*)
- ☐ Any other source of water vapor or moisture; signs of condensation
- ☐ Plumbing defects (*leaking drains, pipes or toilet seals, missing caulk on sinks or tubs*)
- ☐ Damp atmosphere in house
- ☐ Evidence of water penetrating the home (*stains, moist areas*)
- ☐ Visible mold growth (*if "Yes," complete #2*)
- ☐ HVAC problems (*dirty, moist filters, poor condensation drainage, plugged or disconnected vents*)
- ☐ Dryer vented indoors, inadequate ventilation for kitchen, bath or other high moisture area
- ☐ Other (*planters, aquariums, hot tubs, nearby swamps, etc.*) List all that apply

- ☐ Client complaint of allergy-like symptoms

**2. Mold Areas** – Existing conditions (check all that apply)

Checklist	Mold/Musty Odors	Existing Mold	Sq. Ft. of Mold Area	No Evidence of Excessive Mold Found
<input type="checkbox"/> Bath ( <i>location</i> ): _____	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
<input type="checkbox"/> Shower ( <i>location</i> ): _____	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
<input type="checkbox"/> Kitchen	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
<input type="checkbox"/> Laundry Area	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
<input type="checkbox"/> Basement Walls	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
<input type="checkbox"/> Crawlspace	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
<input type="checkbox"/> Exterior Walls	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
<input type="checkbox"/> Attic	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
<input type="checkbox"/> Ceilings	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>
<input type="checkbox"/> Other ( <i>specify</i> ) _____	<input type="checkbox"/>	<input type="checkbox"/>	_____	<input type="checkbox"/>

Moisture/Mold Disclaimer: By signing below, I acknowledge that I have received the above information concerning moisture and mold conditions in my home prior to any weatherization work being done and I will take steps to reduce excessive moisture by utilizing one or more of the tips in the attached Client Tips fact sheet. I also understand that the agency may choose to defer work on my dwelling until the referenced area(s) have been remedied. If the agency proceeds with weatherization work, I agree to hold the agency, and its contractors, performing weatherization harmless for any future moisture or mold problems that are not directly attributable to weatherization work.

\_\_\_\_\_  
Weatherization client signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Agency Representative

\_\_\_\_\_  
Date

Original – Agency File (*always*)  
Copy – Client (*when applicable*)

## Attachment to 612.4 – Client Education Materials

### GRANTEE LETTERHEAD

Dear Homeowner/Renter:

The Michigan Weatherization Assistance Program, in which you are participating, is funded through the Michigan Department of Human Services. It is working to provide you with a warmer, more efficient home at no cost to you. This is not a welfare program, but rather a return on your tax dollars through federal funding. You may receive weatherization services only one time for this dwelling.

The weatherization improvements made are based on energy audit procedures established by the state to provide your home with the most cost effective energy conservation measures, within the limitations of the program. We wish we could provide for all the weatherization needs of your home, but this simply is not possible. However, there are many things you can do to lower the cost of high energy bills, as well as improve the comfort of your home. We will provide you with information regarding no cost/low cost do-it-yourself projects and ideas which could increase your savings by 15 percent to 20 percent.

The whole idea of the program is for us to work together, like partners, to make your home more comfortable, to save energy, to reduce your energy bills so your payments are more affordable.

This letter, and the enclosed step-by-step guide, is to introduce you to a free program which will provide you with energy conservation help and information. Our auditor will review with you *energy action steps* you can take right now. When the weatherization is completed, the inspector will give you some additional information on maintaining the work done to keep you on the road to greater energy savings!

We know this program will be of benefit and look forward to sharing money saving energy ideas with you.

Very Sincerely Yours,

## CLIENT PLAN OF ACTION

CLIENT NAME:

ADDRESS:

TELEPHONE NUMBER:

JOB/CLIENT NUMBER:

The State of Michigan and the Local Weatherization Operator agree to provide, at no cost to the above client, energy conservation measures that prove to be cost effective according to the audit procedures determined by the State of Michigan. There is an 18 month warranty on the materials and workmanship provided.


I have explained the audit procedures and potential energy conservation measures to the client and it is understood that measures to be completed are based on the cost effectiveness and the needs of the household. This is a part of a total partnership approach between the client and the Local Weatherization Operator to reduce this family's energy bills.

\_\_\_\_\_  
Signature of Local Weatherization Operator Representative

\_\_\_\_\_  
Date

I understand that the weatherization assistance is a one-time project for this home. But, by agreeing to a variety of Energy Action Steps, including those listed below, my family can make energy savings an on-going project in the home. Below I have identified three Energy Action Steps that I will try to make my home more energy efficient and comfortable.

1.
2.
3.

\_\_\_\_\_  
Signature of Client

\_\_\_\_\_  
Date

## EXAMPLES OF ENERGY SAVING TIPS

Identify three Energy Action Steps from below on the Client Action Plan that you will take to save money on your energy bills and to make your home more comfortable.

ACTION STEPS	POSSIBLE SAVINGS
<b><u>SPACE HEATING</u></b>	
1. Turn thermostat down to 70 degrees	3% per degree of average bill
2. Set back thermostat at night or when gone to 65 degrees	1% per degree
3. Close windows and storms in winter	\$7 per window per year
4. Do not use space heaters (if at all possible)	\$45 per month per space heater
5. Pull shades at dusk in winter	\$10 to \$25 per year
6. Do not use regular fireplaces to heat the house	The cost of wood. A fireplace does not reduce the furnace use.
<b><u>HOT WATER</u></b>	
7. Keep water setting at low.	\$60 per year
8. Take seven-minute showers	\$72 per year
9. Wash clothes in cold water	\$78 per year
10. Fix leaky faucets	\$4 to \$8 per year
11. Wash only full loads of clothes	\$12 per year
<b><u>APPLIANCES AND OTHER USES</u></b>	
12. Unplug second refrigerator or freezer	\$96 per year
13. Do not use air conditioner unless it is warmer than 78 degrees	3% per degree
14. Use fans instead of air conditioners	fanC\$3 per month, air conditionerC\$30 per month
15. Pull shades in the day during the summer.	\$10 per window per year
16. Unplug unused appliances	\$95 to \$120 per year
17. Water heater: summer turn off winter put on timer	\$28 per month
18. Cover waterbed when not in use	\$41 to \$47 per year
19. Hang clothes outside to dry in the summer	27¢ per load for an electric dryer
<b><u>OTHER SUGGESTED ENERGY SAVING STEPS</u></b>	
20. Move furniture blocking heating vents	Not quantifiable in dollars but increases comfort of home
21. Keep windows closed when air conditioner is on	Not quantifiable in dollars but increases comfort of home

<b>WEATHERIZATION MEASURES</b>
--------------------------------

CLIENT INFORMATION	WEATHERIZATION CONTRACTOR INFORMATION
NAME:	NAME:
ADDRESS:	ADDRESS:
TELEPHONE:	TELEPHONE:

PRIORITY INSTALLED	YES	NO	COMMENTS
Health and Safety Measures			
Duct Sealing/Insulation			
Attic Insulation			
Foundation Perimeter Insulation			
Clock Thermostat			
Infiltration Measures			
Other:			

Local Weatherization Operator Inspector

Date

## GRANTEE LETTERHEAD

Dear Homeowner/Renter:

We have now completed the weatherization work on your home. We thank you for your cooperation and patience throughout the process from application through final inspection.

The work provided was based on the audit procedures set by the federal and state government. The weatherization work should provide you with significant energy savings and help lower heating bills.

However, by becoming involved yourself with the energy education guidelines you agreed to follow, you should be able to save up to 15 percent more. The Energy Action Steps you chose to take when our program began are already helping! There are more no cost/low cost projects you can do yourself to increase the energy efficiency and comfort of your home. The enclosed brochure will help you on your way. You will also find a survey. We urge you to take a few minutes to complete the survey and return it to our office.

We have some ideas for ways to increase the life and efficiency of the energy conservation measures that were applied to your home.

1. Make sure dirt, snow, and ice buildup is kept away from weather-stripping, thresholds, door sweeps, and doors.
2. Keep all sash locks locked to keep sashes from warping.
3. Close off all cold areas during the winter months.
4. If a hot water heater jacket was applied to your water heater, make sure it does not get torn or taken off. You may want to turn your water heater's temperature setting down to conserve energy now that it has been insulated.
5. If insulation was added to your home, do not store articles on it.
6. Make sure all storm windows are closed in the winter. If taken off in the summer, store them in a safe place.
7. Do not remove any weatherization materials that were applied to your home.

Remember, the whole idea of the program is for us to work together like partners to make your home more comfortable, to save energy, and to reduce your bills so your payments are more affordable.

Very Truly Yours,

## WEATHERIZATION ENERGY EDUCATION FOLLOW-UP SURVEY

OWNER/RENTER NAME					
ADDRESS		DATE			
		TELEPHONE			
		YES	NO		
Did the weatherization staff fully explain the weatherization program to you?					
Comments:					
Did the weatherization staff explain to you the work they were going to do on your home before they started?					
Comments:					
Was the energy conservation material provided by the weatherization staff helpful?					
Comments:					
Have you taken any of the energy action steps agreed upon to increase your savings? Please list which ones below: 1. 2. 3.					
Do you like the work the weatherization crew/contractor did on your home?					
Were the materials and quality of the work as good as your expected?					
Comments:					
With the information you have now on no cost/low cost energy saving ideas, do you think you will continue to try more energy action steps to further save on your utility bills?					
Please rate your crew/contractor as follows:		Very Good	Good	Fair	Poor
Did the workers clean up after work each day?					
Were appointments made with you kept?					
How would you rate the quality of the workmanship?					
Were they courteous to you?					
Did they complete the work in a timely manner?					
Is your home more comfortable since the weatherization work has been completed?					
What is your overall ranking of the crew or contractor?					

Thank you for taking the time to give us this information. We use it to improve our program and the services we provide.



# Attachment to 614 – Weatherization Health and Safety Plan

Quicklinks (Hold **CONTROL** Key down and click the link):

[1.0 Policy](#) [2.0 Budgeting](#) [3.0 H&S Exp Limits](#) [4.0 IRMs](#) [5.0 Deferral](#) [6.0 Hazards/Form](#) [7.0 H&S Categories](#) [7.1 Heating](#) [7.2 Asbestos](#) [7.2a Asbestos in, wall, ceiling](#) [7.2b Asbestos Vermiculite](#) [7.2c Asbestos small](#) [7.5 Biologicals](#) [7.6 Bldg/Roof](#) [7.7 Code Compliance](#) [7.8 Combustion Gases](#) [7.9 Electrical](#) [7.10 VOCs/Pollutants](#) [7.11 Fuel Leaks](#) [7.12 Gas Ovens/Stove tops](#) [7.13 Hazardous Materials Disposal](#) [7.14 Injury Prevention](#) [7.15 Lead Based Paint](#) [7.16 Mold/Moisture](#) [7.17 Pests](#) [7.18 Radon](#) [7.19 Safety Devices](#) [7.20 H&S Concerns](#) [7.21 IAQ](#) [7.22 Window/Door](#) [7.23 OSHA](#) [7.24 Clothes Dryer Venting](#)

## ☒ **POLICY SUBMITTED WITH PLAN**

### **1.0 – GENERAL INFORMATION**

*Grantees are encouraged to enter additional information here that does not fit neatly in one of the other sections of this document.*

#### **REFERENCES**

- Department of Energy Weatherization Assistance Program State Plan
- WAP Agreements
- DOE Weatherization Program Notice 17-7, 19-5
- Michigan Weatherization Field Guide
- CSPM 606.1 Program Requirements – WAP Auditing Tools

#### **PURPOSE**

The State Plan for the Weatherization Assistance Program (WAP) and this Weatherization Health and Safety Plan, which is an attachment to the Community Services Policy Manual Item 614, address health and safety (H&S) provisions for weatherization work in Michigan.

According to 10 CFR 440, the following criteria must be met to qualify as a Health and Safety measure.

- Actions must be taken to effectively perform weatherization work; or
- Actions are necessary as a result of weatherization work

#### **POLICY**

Health and Safety (H&S) funds may be used for:

- H&S funds cover the cost of testing and the installation of measures.
- Health and Safety spending is limited to 50% of the total job cost, and the limit is reasonable in light of the primary energy conservation purpose of the Weatherization Assistance Program.

#### **Health and Safety verses Energy Conservation Measures**

Some measures can qualify as either a Health and Safety or an energy conservation measure, such as heating system replacements. When the measure can be cost-justified through an audit, the measure must be treated

as an energy conservation measure. When the measure is not cost-justified through an audit, it cannot be treated as an energy conservation measure.

### **Mandatory Health & Safety Measures**

- Installation of smoke detectors shall be placed in accordance with all State Of Michigan and Local Fire/Building Codes. Smoke detectors must be tested to verify operation of installed alarms.
- Carbon Monoxide (CO) Alarm/Detector are required to comply with ASHRAE 62.2 version 2016 in all residences. CO Alarms/Detectors must be tested to verify operation of installed alarms.
- Implementation of program required ASHRAE 62.2 ventilation standard is required.
- Clothes dryers shall be vented to the exterior.

### **Emergency Procedures**

Agency staff must immediately respond to all life threatening Health and Safety issues or situations identified as life threatening. Use the following immediate responses for life threatening issues identified from testing or from other hazards requiring an immediate response.

Procedures on how crews will handle life threatening hazards are observed: (Example: during testing of Combustion Gases when ambient CO is 70 ppm or greater, building structure issues, gas leaks from natural gas and/or propane, electrical fire hazards, electrical water hazards, and others hazards as identified)

- Terminate the inspection
- Immediately notify the homeowner – occupants of the need for all building occupants to evacuate the building.
- Leave the building
- Notify the appropriate emergency services from outside of the home
- Call the Manager for instructions

### **Reporting of Emergency Situation Requirements**

Reporting the emergency is not an indication for action to be taken by the State's Weatherization Office, it is just a reporting requirement to track emergency situations.

Agency must submit an email to the MDHHS-BCAEO@michigan.gov within 24 hours to report the Health and Safety issues identified. The email should include job number, reason for the issue, and the remedy of the life threatening situation. In addition, please provide the time line and people involved in the response taken in the email. Full documentation on the issues identified, response taken with time line, results of response action, and notification email to the BCAEO must be uploaded in FACSPRO.

### **Reporting of Other Situation Requirements**

Reporting the other situations that require the agency to notify law enforcement or child protective services is not an indication for action to be taken by the State's Weatherization Office, it is just a reporting requirement to track these situations. The agency must submit an email to the MDHHS-BCAEO@michigan.gov within 24 hours to report the other situation issues identified. The email should include job number, reason for the issue, and the entity that was notified.

### **Overall Approach to Health and Safety Measures**

For each issue listed in the Health and Safety Plan:

All work must meet the objective of the Michigan Weatherization Field Guide and/or the Authority Having Jurisdiction.

Program and manufacturer approved materials and instructions must be used while installing any weatherization measures.

When required, licensed professionals will be employed to install work and/or conduct tests. Workers must be qualified and adequately trained to implement the DOE Standard Work Specifications as well as State and local codes specific to the work being conducted (electrical, plumbing, etc.).

Client education is only required where issue exists.

User's manual for installed equipment will always be provided to client.

Training to perform required testing and correctly apply work is implied.

When a health and safety issue is cause for a deferral, the client must be notified in writing, including the conditions that must be met in order for weatherization to move forward.

### **Hazard Identification and Notification**

A Health and Safety assessment must be performed to identify hazards in the dwelling. When hazards are identified, appropriate testing must be performed when required by the Health and Safety Plan. The client/landlord/property manager must be informed, in writing, of

- All testing results, regardless if they will lead to deferral (send by certified mail separately as necessary based on testing and weatherization timeline), and
- Any identified hazards that will lead to deferral.

The notification must be signed by the client and the assessor/auditor, a copy maintained in the client file, and a copy uploaded in FACSPRO.

### **Installation of Health and Safety Measures**

All work must meet the objective of the Michigan Weatherization Field Guide and/or the Authority Having Jurisdiction. Program and manufacturer approved materials and instructions must be used while installing any weatherization measures.

### **Training**

Agency must ensure training for workers to know when the performance of a certain task requires a licensed professional to meet the requirements of the authority having jurisdiction. Agency must ensure workers are qualified and adequately trained to implement the DOE Standard Work Specifications and codes specific to the work being conducted, such as electrical or plumbing.

### **Client Education**

Client education is required when issues exist. For example, client education regarding drainage issues is only required where drainage problems are identified.

Client education is also required on specific topics whether or not issues exist in that area. Those specific topics

are included in the sections that follow.

### ASHRAE Requirements

Implementation of program required ASHRAE 62.2 ventilation standard is required. Client refusal of mechanical ventilation, when evaluated and called for pursuant to the Standard, must result in deferral. Guidance on ASHRAE 62.2 2016 installation beyond the details of this H&S Plan can be found in the Michigan Weatherization Field Guide.

### Health & Safety Concerns and Additional Guidance

## 2.0 – BUDGETING

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*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 ☐

### Budget Management

- The rationale for performing each Health and Safety measure in an individual home and its relationship to the energy conservation measure that necessitated it must be clearly documented in the client file and FACSPRO.
- The average Health and Safety expenditure limit is 19.95% of the Program Operations budget.
- Health & Safety measures are charged to their own line item.
- Client file documentation must show costs in appropriate budget categories, including Health and Safety.
- Health and Safety funds cover the cost of testing, and the installation of measures around allowable Health and Safety measures as defined in section 7 of this document.
- Client education or training costs can be charged to Training and Technical Assistance budget.
- All funding sources that will be used to pay for Health and Safety measures to ensure that adequate funds are allocated must be identified.
- Code Compliance: DOE funds will not be used to meet existing code compliance issues unless the installation of a measure necessitates so.

## 3.0 – HEALTH AND SAFETY EXPENDITURE LIMITS

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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

### Health and Safety Measures and Budget

The Average Health and Safety Expenditure Limit is 19.95% of the Program Operations budget. To ensure that program services concentrate on energy efficient measures and the costs must be reasonably justified, H&S measures must not total more than 50% of the total job cost.

If health and safety costs of a job do exceed more than 50% of the total job costs, the Grantee may submit a waiver to BCAEO for approval from technical staff before proceeding. The Grantee is responsible for documenting the email approval from the technical staff and including it with the file documentation. Buildings that cannot be weatherized without the H&S measures shall be deferred. H&S measures are not considered as part of the cumulative SIR and do not need an SIR to install.

In instances where the H&S measure that pushes the H&S cost over 50% of total job cost is an ASHRAE fan or system, the subgrantee may move forward on the project without review and permission from MDHHS-BCAEO technical staff. Items defined as Health and Safety measures and paid from the Health and Safety Line Item:

- Need not be cost-justified by the energy audit, and
- Are not included in the Average Cost Per Unit.

If the measure is an approved WAP expenditure and the audit justifies the costs with an SIR equal to or greater than 1.0, the measure must be performed and costs charged as an Energy Conservation Measure (ECM). If the measure is not an eligible ECM, the measure may be charged as a Health and Safety (H&S) measure. The measure may be considered for H&S repair or replacement only after it is determined that the measure is not cost-effective.

CSPM 614

[http://www.michigan.gov/documents/dhs/CSPM\\_600\\_Series\\_215133\\_7.pdf](http://www.michigan.gov/documents/dhs/CSPM_600_Series_215133_7.pdf) CSPM 600 Series

H&S Measure Matrix - Optional			
Double Click To Open For Editing			
Cells this shade auto calculate			
Enter Measure ↓	Enter Cost ↓	Enter Frequency % ↓	Auto Calculates
Gas valve Replacement	\$100.00	11.0%	\$11.00
ASHRAE Compliant Fan	\$800.00	80.0%	\$640.00
Energy Recovery Ventilator	\$1,250.00	1.0%	\$12.50
High Efficiency Furnace	\$2,000.00	16.0%	\$320.00
Power Vented Water Heater	\$1,500.00	20.0%	\$300.00
Electric Water Heater	\$850.00	2.0%	\$17.00
Dryer Vent Complete	\$120.00	25.0%	\$30.00
CO & Smoke Detectors	\$60.00	65.0%	\$39.00
Chimney Liner	\$600.00	15.0%	\$90.00
Vent Connector	\$174.47	10.0%	\$17.45
Roof Repair	\$250.00	5.0%	\$12.50
Replace out-dated Flex Gas Line	\$100.00	5.0%	\$5.00
Ground Moisture Barrier	\$175.00	40.0%	\$70.00
Asbestos on pipes, small surfaces	\$500.00	2.5%	\$12.50
Total Average H&S Cost Per Unit			\$1,576.95
Enter Estimated Production (Annual File: IV.2 WAP Production Schedule) →			2,336
Enter Estimated Program Operations Budget →			18,875,075
H&S Budget (Total Average H&S Cost Per Unit * Estimated Production)			\$3,683,748.19
Requested H&S Percentage Per Unit (H&S Budget/Program Operations)			19.5%

## 4.0 – INCIDENTAL REPAIR MEASURES

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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.*

[\(10 CFR 440 "Definitions"\)](#)

### Incidental Repair Measures

Any measure referenced in conjunction as an Energy Conservation Measure will be considered an Incidental Repair Measure, otherwise they will be considered a Health and Safety 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.

The following measures will be performed as Incidental Repair Measures (IRM) when an Energy Conservation Measure (ECM) is installed that they could be attached to as an IRM. In accordance to WPN 12-9, IRMs are measures necessary for the effective performance or preservation of installed ECMs. If the measures cannot be attached as an IRM to an ECM, the measures may be charged to Health and Safety as a stand alone measure.

- Moisture Repairs
- Vapor Retarder Installation
- Electrical Repairs

Repairing a small roof leak will be charged to Incidental Repair Measures when attic insulation is installed. To pay for a roof repair under Health & Safety, please see details in section 7.6 of this document.

CSPM 607

[http://www.michigan.gov/documents/dhs/CSPM\\_600\\_Series\\_215133\\_7.pdf](http://www.michigan.gov/documents/dhs/CSPM_600_Series_215133_7.pdf) CSPM 600 Series

## 5.0 – DEFERRAL/REFERRAL POLICY

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*Deferral of services may be necessary if H&S issues cannot be adequately addressed according to WPN 17-06 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?

CSPM 609

[http://www.michigan.gov/documents/dhs/CSPM\\_600\\_Series\\_215133\\_7.pdf](http://www.michigan.gov/documents/dhs/CSPM_600_Series_215133_7.pdf) CSPM 600 Series

## 6.0 – HAZARD IDENTIFICATION AND NOTIFICATION FORM(S)

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*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 ☐

Agencies have the option of using the standard Hazard Identification and Notification form to notify clients of potential issues defined in section 7 of this document. Agencies may elect to use an alternate form if that form

meets the minimum requirements of notification to the client as specified throughout section 7 of this document.

[CSPM 614 Attachment B Hazard Identification and Notification Form](#)

## 7.0 – HEALTH AND SAFETY CATEGORIES

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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 17-07, 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

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### 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 ☐

The project shall be deferred until additional funds can be secured (from listed sources below) to cover costs exceeding the H&S budgeted amount. Alternate funding such as LIHEAP, MPSC, HUD, USDA, Municipal Health Department and Emergency Funds shall be utilized to address this particular health and safety category. Other local funding may be available and utilized.

Budget Category Decisions: Perform a full DOE-approved energy audit prior to deciding how to categorize the cost of space heater repair or replacement. A space heater may only be replaced with Health and Safety funds if it is the primary heating unit. If the measure is an approved WAP expenditure and the audit justifies the costs with an SIR equal to or greater than 1.0, the measure must be performed and costs charged as an Energy Conservation Measure (ECM). If the measure is not an eligible ECM, the measure may be charged as a Health and Safety (H&S) measure.



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

When the Energy Auditor or any other weatherization employee encounters an unsafe or inoperable heating appliance during the heating season, if WAP funds are unable to correct the issue, weatherization work should not proceed until the condition is corrected.

**Code Compliance and Inspection Requirements:** Compliance with the DOE Space Heater Policy is required. Un-vented space heaters as the primary heat source must be replaced with vented space heaters prior to any weatherization activities. The purchase/installation of un-vented space heaters is prohibited. Installation of space heaters requires knowledge of appropriate industry standards and comply with the applicable building code(s) in the municipality where installation is taking place. Building permits shall be secured, where required for all space heater work. This is a program operations cost. The manufacturer approved initial start-up procedures must be followed before any heater is put into operation. Agencies are reminded that even licensed heating contractors may not be aware of the stringent requirements of the Weatherization Program, so their work should be reviewed by Program staff. These requirements should be sent to the contractor prior to their installation of a heating system as part of their contract with the agency. Safety inspections related to the space heater should include, but not be limited to, a check for adequate floor protection, and code-compliant clearances to walls and other combustible materials. Even though many vented space heaters are manufactured with spill switches, it is still a requirement that a worst-case depressurization draft test be performed on all vented units.

**Electric Space Heaters:** DOE will not permit any DOE-funded weatherization work other than minor repairs on electric space heaters. This does not preclude the use of other funding sources for the replacement or major repair of electric space heaters, but the Department does not encourage it because of:

- Lower output ratings (size);
- Risk of fire hazards; and,
- Inadequate electrical systems in older homes, which frequently cannot safely carry the power required to operate an electric heater.

Work on such systems may make local agencies liable for inadequate electric wiring and any damages that result.

**Fireplaces – Special Considerations:** Fireplaces present special hazards that are affected by weatherization. If draft is poor, smoke may downdraft into the living space causing poor indoor air quality. It is likely the occupants will ventilate in these situations. Near the end of a wood fire, glowing coals will remain, radiating heat, while the draft lowers and allows the top of the chimney to cool, further reducing draft. The reduced oxygen available to the glowing coals causes production of CO without the smoke that encourages space ventilation. This is a dangerous situation as the CO enters the living space due to the lowered draft, causes drowsiness of occupants, and sometimes worse. For this reason it is extremely important to make sure there is a CO alarm installed in this combustion zone and occupants are educated to the danger signs and what to do.

**Inspection/Evaluation:** Assessing solid fuel fired appliances involves inspecting the venting/chimney and the overall installation to ensure it adheres to the applicable code: NFPA 211 or other as determined by the authority having jurisdiction. Appliances should be inspected pre- and post-weatherization.

Conduct pre- and post- weatherization worst case CAZ depressurization testing in spaces having a fireplace. If fireplaces are left operational, the vent must meet code or the home cannot be weatherized. Fireplaces may be permanently disabled if it is determined that the client will not use it or it is obviously inadequate.

To evaluate operation of other combustion appliances, the blower door can be set to run at 300 CFM (set up as for depressurization testing), or other Grantee-approved flow, to mimic the airflow dynamics likely when the fireplace is in use.

**Manufactured Homes – Special Considerations:** The Manufactured Home Construction and Safety Standards (<https://portal.hud.gov/hudportal/HUD?src=/hudprograms/mhcss>) require all fuel-burning, heat-producing appliances in mobile homes, except ranges and ovens, to be vented to the outside.

All fuel-burning appliances in mobile homes, except ranges, ovens, illuminating appliances, clothes dryers, must be installed to provide for the complete separation of the combustion system from the interior atmosphere of the manufactured home (i.e., to draw their combustion air from outside).

**Masonry Chimneys:** Masonry chimneys used by vented space heaters should be properly lined in compliance with the International Fuel Gas Code (IFGC). When WAP installs new equipment it must meet local code requirements. Masonry chimneys that have been retired (i.e. not being used by existing equipment) should be assessed for energy savings opportunities such as air sealing and capping to reduce thermal bypass.

**Solid-Fueled Space Heaters:** Solid fueled space heaters include wood stoves, coal stoves, pellet stoves, and fireplaces. Wood, coal, and pellet fired furnace and boiler systems should be treated as vented heating systems and are not covered here.

Assess solid fuel-fired appliances to ensure safe installation prior to weatherization activities taking place. Repair or removal is an allowed H&S measure for primary and secondary solid fuel-fired heating appliances. Replacement is allowed for primary solid fuel heating appliances but replacement is not allowed for secondary heating appliances. Repair of flues and proper installation (e.g. protection of combustibles), is required for both primary and secondary solid fuel heating appliances. Install replacement primary heaters and/or flues according to applicable codes, standards and manufacturer's instructions. Provide adequate combustion air.

**Unvented Gas- and Liquid-Fueled Space Heaters:** This policy applies to unvented space heaters fueled by natural gas, propane or kerosene. This policy is consistent with the IRC and the IFGC and is divided to address primary and secondary heat sources. Unvented space heaters are not allowed in manufactured homes.

**Primary Heat Sources:** DOE will not permit any DOE-funded weatherization work where the completed dwelling unit is heated with an unvented gas- and/or liquid-fueled space heater as the primary heat source. The primary heat source must be replaced with a vented unit prior to weatherization. The replacement unit should be sized so it is capable of heating the entire dwelling unit, consistent with audit requirements described in 10 CFR 440.21(e)(2).

**Secondary Heat Sources:**

Secondary unvented units that conform to the safety standards of ANSI Z21.11.2 may remain as back-up heat sources. DOE is allowing this flexibility primarily to provide low-income clients an emergency back-up source of heat in the event of electrical power outages. When selecting items to leave behind, give preference to code-compliant units that do not require electricity.

Secondary unvented units that do not meet ANSI Z21.11.2 must be removed and properly disposed of prior to weatherization but may remain until a replacement heating system is in place. Repair of secondary unvented units is not allowed. Secondary unvented units that meet the ANSI Z21.11.2, but are not operating safely, must be removed and properly disposed of.

An unvented gas- and liquid-fueled space heaters that remains in a completed single-family house after weatherization shall:

- Not have an input rating in excess of 40,000 Btu/hour;
- Not be located in, or obtain combustion air from sleeping rooms, bathrooms, toilet rooms, or storage closets, except:
  - One listed wall-mounted space heater in a bathroom if permitted by the authority having jurisdiction which --:
    - Has an input rating that does not exceed 6,000 Btu/hour;
    - Is equipped with an oxygen-depletion sensing safety shut-off system; and
    - The bathroom has adequate combustion air;
  - One listed wall-mounted space heater in a bedroom if permitted by the authority having jurisdiction, which --:
    - Has an input rating that does not exceed 10,000 Btu/hour;
    - Is equipped with an oxygen-depletion sensing safety shut-off system; and
    - The bedroom has adequate combustion air.

**Vented Gas- and Liquid-Fueled Space Heaters:** Treat vented gas- and liquid-fueled space heaters the same as furnaces in terms of combustion safety testing, repair and replacement. This policy applies to vented space heaters fueled by natural gas, propane, or oil.

### **Primary Heating System Repair, Replacement or Installation**

The primary system is defined as the system that is most relied upon to provide heating throughout the season. Heating systems will be replaced as health and safety if the auditor or mechanical contractor has determined the system is a health or safety issue for the household. Additionally, the audit shows that the replacement is not an energy conservation measure.

Costs related to unsafe heating systems repair or replacement are determined by SIR value. If SIR greater than 1, charge to Energy Conservation Measure (ECM) and if SIR is less than 1, charge to Health and Safety budget.

Disposal Procedures shall be in compliance with all local, state and federal EPA requirements.

When a space conditioning system does not qualify as an ECM, the following conditions must be met before the unit can be replaced or repaired with Health and Safety funds:

- “Red tagged,” inoperable, or nonexistent primary heating system may be replaced, repaired, or installed where climate conditions warrant, consistent with this guidance.
- Use proper sizing protocols (Manual J, State Approved sizing protocols, NEAT/MHEA outputs, etc.) based on post-weatherization housing characteristics, including installed mechanical ventilation, when installing or replacing a heating appliance.

- Unsafe primary units must be repaired, replaced and removed, or rendered inoperable, or deferral is required.
- Replacement or installation of secondary units is not allowed.
- Unsafe secondary units, including space heaters, must be repaired, removed or rendered inoperable, or deferral is required. Compliance with the DOE Space Heater Policy is required. Un-vented space heaters as the primary heat source must be replaced with vented space heaters prior to any weatherization activities.

**Furnace Filters:**

Furnace filters may be provided as an allowable H&S measure.

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

The secondary system is defined as the system that is employed only in extreme weather. Replacement or installation of secondary units is not allowed.

Unsafe secondary units, including space heaters, must be repaired, removed or rendered inoperable, or deferral is required.

For further information on secondary Unvented Gas- and Liquid-Fueled Space Heaters, see section above.

### **Indicate Documentation Required for At-Risk Occupants**

- Any documentation that supports the existence of an at-risk occupant will be included in the client file. All reasonable efforts will be made to ensure the safety of at-risk occupants.
  - Documentation with signature from the client's physician indicating a client's health is at-risk without the installation of the air-conditioning system is necessary to prove the client is defined as "at-risk".

### **Testing Protocols**

Refer to the Michigan Weatherization Field Guide for appropriate testing protocols as detailed in chapters 1 and 8.

### **Client Education**

Client education is provided during the energy audit, installation of measures, and during the QCI inspection.

**Client Education**

- When deferral is necessary, provide information to the client, in writing, describing conditions that must be met in order for weatherization to commence. A copy of this notification must also be placed in the client file.
- Discuss appropriate use and maintenance of units.
- Provide all paperwork and manuals for any installed equipment.
- Discuss and provide information on proper disposal of bulk fuel tanks when not removed as part of the weatherization work.
- Where combustion equipment is present, provide safety information including how to recognize depressurization.
- Dirty or non-existent furnace filters shall be evaluated for replacement. Clients shall be instructed in proper intervals for replacement of the filters.

Training
<ul style="list-style-type: none"> <li>• Weatherization Assistance Program Health and Safety policy training on allowable activities.</li> <li>• Licensing and/or certification for HVAC installers as required by authority having jurisdiction (AHJ).</li> <li>• CAZ depressurization test and inspection training.</li> </ul>

7.2 – Asbestos – All		Back to First
<b>What is the blower door testing policy when suspected Asbestos Containing Material (ACM) is identified?</b>		
<p>When friable Presumed Asbestos Containing Material (PACM) is suspected, in the home, the blower door test will not be conducted to avoid disturbing friable ACM particles and the work will be deferred until all friable PACMs have either been tested and confirmed to not be ACM or safely removed and disposed of by an authorized agency. “Friable” means the material can be crumbled, pulverized, or reduced to powder by the pressure of an ordinary human hand. In cases where a home was deferred due to PACM and then later approached for weatherization, the client must provide documentation that the PACM was tested and confirmed to not be an ACM by a certified tester or a certified professional performed the removal or remediation of asbestos and the client must provide results of the Air Quality Testing (to ensure air quality is safe for workers). Michigan follows the EPA guidelines that ACM is defined as material containing 1% or more of asbestos. If an agency tests potential ACM and determines that it contains levels of asbestos between 0% and 1%, the staff or contractor interacting with the material must wear personal protective equipment.</p>		
7.2a – Asbestos - in siding, walls, ceilings, etc.		Back to First
<b>Concurrence, Alternative, or Deferral</b>		
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>
<b>Funding</b>		
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input type="checkbox"/>
<p>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. General abatement of asbestos siding or replacement with new siding is not an allowable H&amp;S cost. If a site is suspected to have asbestos and is unable to concur this guidance, the project shall be deferred until friable asbestos materials have been safely removed and disposed of by an authorized agency and indoor air quality testing shows workers can proceed in a safe environment.</p>		
<b>How do you address suspected ACM’s in siding, walls, or ceilings that will be disturbed through the course of weatherization work?</b>		
Take all reasonable and necessary precautions to prevent asbestos contamination in the home.		

**Asbestos**

Asbestos fibers are microscopic. When disturbed and released into the air, the fibers can be inhaled. Significant exposure may result in lung cancer, asbestosis, or Mesothelioma. Known asbestos containing building components shall not be handled during the course of weatherization work in a way which would cause the transmission of asbestos dust into the air.

Friable asbestos is any asbestos containing product which can be crumbled, pulverized, or reduced to powder by hand pressure. Friable asbestos shall not be touched. If suspected friable asbestos is found in a home, written notification shall be provided to the client/owner. Notice of Asbestos (DHS-4290) is located in the forms section at the end of this manual. A copy of the written notification shall be maintained in the client file.

<https://www.energy.gov/eere/wipo/weatherization-program-guidance>

**Testing Protocols**

- Asbestos Hazard Emergency Response Act of 1986 (AHERA) sample collection and testing is allowed and must be conducted by a certified tester.

**Client Education**

- Referral to the local Health Department is recommended.
- Instruct clients in writing not to disturb suspected ACM.
- Provide asbestos safety information to the client.
- Formally notify client in writing of results if testing was performed.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

**Training and Certification Requirements**

- Training will include how to recognize asbestos insulation, potential asbestos containing material found in a home, and existing vermiculite that may contain asbestos. As well as how to avoid disturbing asbestos in any way.

**7.2b – Asbestos - in vermiculite**
[Back to First](#)
**Concurrence, Alternative, or Deferral**

Concurrence with Guidance ☐

Alternative Guidance ☒

Results in Deferral ☐

**Funding**

DOE ☒

LIHEAP ☒

State ☐

Utility ☐

Other ☐

USDA, Municipal Health Department and Emergency Funds shall be utilized to address this particular health and safety category. Other local funding may be available and utilized.

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

If site is found to have asbestos, this project shall be deferred until all asbestos materials have been safely removed and disposed of by an authorized agency. Disposal Procedures shall be in compliance with all local, state and federal EPA requirements:

- When vermiculite is present, assume it contains asbestos unless testing determines otherwise.
- Do not perform a blower door test to avoid disturbing the vermiculite.
- Use proper respiratory protection while in areas containing vermiculite.
- Encapsulation by an appropriately trained asbestos control professional is allowed.
- Removal is not allowed.
- When deferral is necessary due to asbestos, occupant must provide documentation that a certified professional performed the remediation and an air quality test was performed before work continues.
- If this testing determines the vermiculite does not contain asbestos, or the vermiculite is encapsulated, the project may move forward.
- Otherwise, this project shall be deferred to the Local Health Department or other EPA affiliate to determine presence of asbestos.
- The project shall be deferred until the site is tested and found to be within safe levels in compliance with all local, state and federal EPA requirements.

**Testing Protocols**

- Asbestos Hazard Emergency Response Act of 1986 (AHERA) sample collection and testing is allowed and must be conducted by a certified tester.
- Baseline environmental asbestos sampling is an allowable cost.

**Client Education**

- Referral to the local Health Department is recommended.
- Instruct clients in writing not to disturb suspected ACM.
- Provide asbestos safety information to the client.
- Formally notify client in writing of results if testing was performed.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

**Training and Certification Requirements**

- Training will include how to recognize asbestos insulation, potential asbestos containing material found in a home, and existing vermiculite that may contain asbestos. As well as how to avoid disturbing asbestos in any way.
- AHERA or state certification to conduct testing.
- AHERA or other appropriate asbestos control professional certification/training for encapsulation.



7.2c – Asbestos - on pipes, furnaces, other small covered surfaces				
<a href="#">Back to First</a>				
<b>Concurrence, Alternative, or Deferral</b>				
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>		Results in Deferral <input type="checkbox"/>	
<b>Funding</b>				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
<b>How do you address suspected ACM's (e.g., pipes, furnaces, other small surfaces) that will be disturbed through the course of weatherization work?</b>				
<ul style="list-style-type: none"> <li>Assume asbestos is present in suspect covering materials.</li> <li>When friable suspected ACMs are present, unless testing determines otherwise, take precautionary measures as if they contain asbestos.</li> <li>Do not conduct a blower door test to ensure the friable suspected ACM is not disturbed.</li> <li>In cases where the suspected ACM is friable, the project shall be deferred until the site is tested and found to be within safe levels in compliance with all local, state and federal EPA requirements.</li> <li>Prior to weatherization, encapsulation is allowed by an appropriately trained asbestos control professional and should be conducted prior to blower door testing if the materials are friable.</li> <li>This project shall be deferred to the Local Health Department or other EPA affiliate to determine presence of asbestos.</li> <li>If site is found to have friable asbestos, this project shall be deferred until all friable asbestos materials have been safely removed and disposed of by an authorized agency.</li> <li>Abatement of ACM within this section is allowable on a case-by-case basis. Requests must be submitted to BCAEO before work is completed and the following items will be considered: <ul style="list-style-type: none"> <li>Cost of the abatement of asbestos; if the ACM abatement costs remain within 50% of the total job cost, the abatement may be approved by BCAEO</li> <li>Scope of the asbestos; ACM must be isolated to a specific location as noted in the title of this section <ul style="list-style-type: none"> <li>Approval of abatement under DOE H&amp;S will not be considered in the cases of vermiculite or siding</li> </ul> </li> <li>After review of the request, BCAEO will issue a decision to the agency. Only after an approval is issued from BCAEO may the agency proceed with this work.</li> </ul> </li> </ul>				
<b>Testing Protocols</b>				
<ul style="list-style-type: none"> <li>Asbestos Hazard Emergency Response Act of 1986 (AHERA) sample collection and testing is allowed and must be conducted by a certified tester.</li> </ul>				

Client Education
<ul style="list-style-type: none"> <li>• Referral to the local Health Department is recommended.</li> <li>• Instruct clients in writing not to disturb suspected ACM.</li> <li>• Provide asbestos safety information to the client.</li> <li>• Formally notify client in writing of results if testing was performed.</li> <li>• When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.</li> </ul>
Training and Certification Requirements
<ul style="list-style-type: none"> <li>• Training will include how to recognize asbestos insulation, potential asbestos containing material found in a home, and existing vermiculite that may contain asbestos. As well as how to avoid disturbing asbestos in any way.</li> <li>• AHERA or other appropriate asbestos control professional certification/training is required to abate the ACM.</li> </ul>

<b>7.5 – Biologicals and Unsanitary Conditions</b> (odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.)				
				<a href="#">Back to First</a>
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>		Results in Deferral <input type="checkbox"/>	
Unallowable Measure <input type="checkbox"/>				
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
DOE Health & Safety funds may be used for remediation of conditions that may lead to or promote biological concerns and unsanitary conditions is allowed.				
What guidance do you provide Subgrantees for dealing with biological and/or unsanitary conditions in homes slated for weatherization?				
<p>The Notice of Potential Hazard defines a condition to be eliminated and if outside the scope of Weatherization or client maintenance.</p> <ul style="list-style-type: none"> <li>• Remediation of conditions that may lead to or promote biological concerns and unsanitary conditions is allowed.</li> <li>• Client education and deferral to local Housing Funded programs and Health Department.</li> <li>• Addressing bacteria and viruses is not an allowable cost.</li> <li>• See Mold and Moisture section for more information.</li> </ul>				
Testing Protocols				
Sensory inspection followed with issuing a Notice of Potential Hazard defining deferring all weatherization work until condition has been eliminated.				

Client Education
<ul style="list-style-type: none"> <li>• Inform client in writing of observed conditions.</li> <li>• Provide information on how to maintain a sanitary home. EPA handout on remedying Mold and mildew issues when applicable.</li> <li>• When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.</li> </ul>
Training
<p>Through local Health Department and the State Extension office.</p> <ul style="list-style-type: none"> <li>• How to recognize unsafe conditions and when to defer.</li> <li>• Safe work practices when encountering such conditions.</li> </ul>

7.6 – Building Structure and Roofing					Back to First
Concurrence, Alternative, or Deferral					
Concurrence with Guidance <input type="checkbox"/>		Alternative Guidance <input checked="" type="checkbox"/>		Results in Deferral <input type="checkbox"/>	
Funding					
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>	
Incidental and minor repairs, as defined below, are allowable. Otherwise, project will be deferred until area of repairs can be corrected or eliminated through other funding sources or incidental repairs.					
What guidance do you provide Subgrantees for dealing with structural issues (e.g., roofing, wall, foundation) in homes slated for weatherization?					
<ul style="list-style-type: none"> <li>• Building rehabilitation is beyond the scope of the Weatherization Assistance Program.</li> <li>• A visual inspection shall be followed up with the issuance of the appropriate Notice of potential hazard.</li> <li>• Homes that require more than minor repairs must be deferred, see the incidental repair policy CSPM 607.</li> <li>• See Mold and Moisture, Code Compliance, and Pests sections for more information.</li> <li>• Ensure that access to the portions of the home where weatherization will occur are safe for entry and performance of assessments, work, and inspections.</li> </ul>					
How do you define “minor” or allowable structure and roofing repairs, and at what point are repairs considered beyond the scope of weatherization?					
<b>Incidental Repairs for Minor work</b> <ul style="list-style-type: none"> <li>• DOE funds will be used for incidental repairs of Building Structure and Roofing, see the incidental repair policy CSPM 607.</li> </ul>					

**Health & Safety Funds for Minor Work**

- If no attic insulation is installed and the repair cannot be an incidental repair, then a minor repair may be done under Health & Safety, if:
  - It resolves a bulk water intrusion issue that is the cause of visible biological growth, and;
  - The limit of spending on such a repair under Health & Safety is \$250, and;
  - The H&S roof repair is well documented with written explanation and photos of the biological growth in the client file

**Beyond Scope of Weatherization**

Project will be deferred until area of repairs can be corrected through other funding sources. Referral shall be made through the Notice of Potential Hazard and recommendations to seek a building inspection by a licensed building QC Inspector or contractor.

**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**

Energy Auditors shall inform the residents of the potential hazard and recommendation to seek remedy of the condition.

**Training**

How to identify structural and roofing issues.

**7.7 – Code Compliance**
[Back to First](#)
**Concurrence, Alternative, or Deferral**

Concurrence with Guidance ☐      Alternative Guidance ☒      Results in Deferral ☐

Correction of preexisting code compliance issues is not an allowable cost other than where triggered by weatherization measures being installed in a specific room or area of the home.

When correction of preexisting code compliance issues is triggered and paid for with WAP funds, cite specific code requirements with reference to the weatherization measure(s) that triggered the code compliance issue in the client file.

USDA, Municipal Health Department and Emergency Funds shall be utilized to address this particular health and safety category. Other local funding may be available and utilized.

**Funding**

DOE ☒      LIHEAP ☒      State ☐      Utility ☐      Other ☐

<b>What guidance do you provide Subgrantees for dealing with code compliance issues in homes receiving weatherization measures?</b>
<ul style="list-style-type: none"> <li>• When identified Code violations shall be listed on a Notice of Potential Hazard, and issued to the occupant.</li> <li>• A deferral of weatherization work will occur until the required Code compliance is met.</li> <li>• Referrals can be made to the customer to contact the local building inspection agents and item of Code incorrectness listed on the Notice of Potential Hazard.</li> <li>• When a condition cannot be corrected within the Incidental Repair costs category, work should be deferred.</li> </ul>
<b>What specific situations commonly trigger code compliance work requirements for your network? How are they addressed?</b>
<ul style="list-style-type: none"> <li>• Follow State and local codes while installing weatherization measures.</li> <li>• Condemned properties and properties where “red tagged” H&amp;S conditions exist that cannot be corrected under this guidance must be deferred.</li> <li>• If code issues are cause for deferral, or if code compliance work is triggered by weatherization work the agency must cite the specific code in the client file.</li> </ul>
<b>Client Education</b>
<ul style="list-style-type: none"> <li>• Energy Auditors shall inform the residents of the potential hazard and recommendation to seek remedy of the condition.</li> <li>• Inform client in writing of observed code compliance issues when it results in a deferral.</li> <li>• When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.</li> </ul>
<b>Training</b>
<ul style="list-style-type: none"> <li>• Code Compliance TrainingIE. Michigan Residential Building License Code Compliance Training</li> </ul>

7.8 – Combustion Gases					Back to First
<b>Concurrence, Alternative, or Deferral</b>					
Concurrence with Guidance <input type="checkbox"/>		Alternative Guidance <input checked="" type="checkbox"/>		Results in Deferral <input type="checkbox"/>	
<b>Funding</b>					
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>	
<p>Costs related to replacing an appliance are determined by SIR value. If SIR greater than 1, charge to Energy Conservation Measure (ECM) and if SIR is less than 1, charge to Health and Safety budget.</p>					
<b>Testing Protocols</b>					
<ul style="list-style-type: none"> <li>• Health and Safety protocol testing provides detection with air sampling equipment to determine elevated levels of combustion gases and their byproducts. When testing indicates a problem, correct the problem.</li> <li>• When elevated levels are detected, all weatherization work is suspended until a safe environment is restored.</li> <li>• When weatherization funds cannot address the listed Health and Safety condition, a referral is made to local housing programs and emergency fund sources.</li> <li>• Combustion safety testing is required when combustion appliances are present.</li> <li>• 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). Agency will complete and review the Test In and Test Out form for the client file.</li> <li>• Inspect venting of combustion appliances and confirm adequate clearances.</li> <li>• Check DOE-approved audit to determine if the appliance can be justified as an ECM prior to replacement as an H&amp;S measure.</li> </ul>					
<b>Carbon Monoxide</b>					
<p>Potential CO related health and safety concerns shall be discussed with the client. The client shall be immediately advised of any serious concerns relative to CO. If CO testing indicates a CO problem, a Notice of Indoor Air Quality Concern, DHS-4289 shall be provided.</p>					

**Required Actions in Response to Ambient CO Measurements  
(from ANSI/BPI-1200, Section 7.3.3.3)**

<b>70 ppm or greater</b>	<b>36 ppm-69 ppm</b>	<b>9 ppm- 35 ppm</b>
<ul style="list-style-type: none"> <li>• Terminate the inspection.</li> <li>• Notify the homeowner - occupant of the need for all building occupants to evacuate the building.</li> <li>• Leave the building and the appropriate emergency services shall be notified from outside the home.</li> </ul>	<ul style="list-style-type: none"> <li>• Advise the homeowner - occupant that elevated levels of ambient CO have been detected.</li> <li>• Open windows and doors. Recommend that all possible sources of CO be turned off immediately.</li> <li>• Where it appears that the source of CO is a permanently installed appliance, recommend that the appliance be turned off and advise homeowner – occupant to contact a qualified professional.</li> </ul>	<ul style="list-style-type: none"> <li>• Advise the homeowner - occupant that CO has been detected.</li> <li>• Recommend that all possible sources of CO be checked and windows and doors opened.</li> <li>• Where it appears that the source of CO is a permanently installed appliance, advise the homeowner - occupant to contact a qualified professional.</li> </ul>

**Combustion Appliance**

- All combustion appliances shall be inspected during energy audit by the BCAEO approved/certified energy auditor and during the Quality Control Inspection by an IREC accredited certified QCI and/or tested by a licensed mechanical contractor. (Reference BPI-1200 standard). Related sections of the SOM approved audit shall be completed. State of MI Mechanical rules and regulations must be adhered to.
- The Combustion Appliance Zone procedure to check for vent stack spillage shall be followed and documented on the SOM approved audit.

**Worst Case Draft of Combustion Appliance Zone**

Combustion appliances shall be tested under the worst case depressurization of the Combustion Appliance Zone (CAZ). The Worst Case Depressurization of the CAZ testing, when performed, shall be documented on the SOM approved audit. For further information on required CAZ testing, see CSPM 606.2.

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

**Emergency Procedures**

Agency staff must immediately respond to all life threatening Health and Safety issues or situations identified as life threatening. Use the following immediate responses for life threatening issues identified from testing or from other hazards requiring an immediate response.

Procedures on how crews will handle life threatening hazards are observed: (Example: during testing of Combustion Gases when ambient CO is 70 ppm or greater, building structure issues, gas leaks from natural gas and/or propane, electrical fire hazards, electrical water hazards, and others hazards as identified)

- Terminate the inspection
- Immediately notify the homeowner – occupants of the need for all building occupants to evacuate the building.
- Leave the building
- Notify the appropriate emergency services from outside of the home
- Call the Manager for instructions

#### Reporting of Emergency Situation Requirements

Reporting the emergency is not an indication for action to be taken by the State's Weatherization Office, it is just a reporting requirement to track emergency situations.

Agency must submit an email to the MDHHS-BCAEO@michigan.gov within 24 hours to report the Health and Safety issues identified. The email should include job number, reason for the issue, and the remedy of the life threatening situation. In addition, please provide the time line and people involved in the response taken in the email. Full documentation on the issues identified, response taken with time line, results of response action, and notification email to the BCAEO must be uploaded in FACSPRO.

#### Reporting of Other Situation Requirements

Reporting the other situations that require the agency to notify law enforcement or child protective services is not an indication for action to be taken by the State's Weatherization Office, it is just a reporting requirement to track these situations. The agency must submit an email to the MDHHS-BCAEO@michigan.gov within 24 hours to report the other situation issues identified. The email should include job number, reason for the issue, and the entity that was notified.

#### Client Education

- A Notice of Potential Hazard is issued with a detailed listing of the areas in which the condition presented elevated levels of combustion gas and its byproducts.
- Provide client with combustion safety and hazards information.

#### Training

- State of Michigan trains inspection candidates on ways to determine air samples which would identify potentially hazardous condition within and around the residential dwelling.
- How to perform appropriate testing, determine when a building is excessively depressurized, and the difference between air free and as-measured CO.
- CO action levels.

### 7.9 – Electrical

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#### Concurrence, Alternative, or Deferral

Concurrence with Guidance ☐      Alternative Guidance ☒      Results in Deferral ☐

#### Funding

DOE ☒      LIHEAP ☒      State ☐      Utility ☐      Other ☐



DOE Funds will not be used beyond incidental repairs or a H&S Minor repair as defined below. When the H&S of the occupant/worker(s) is at risk, minor repairs, as defined below, are allowed when necessary for weatherization measures. USDA, Municipal Health Department and Emergency Funds shall be utilized to address this particular health and safety category. Other local funding may be available and utilized.

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

- Projects that can eliminate knob and tube as an IRM within an ECM or a minor repair can be done.
- If necessary, sufficient over-current protection and damming (if required) prior to insulating building components containing knob and tube wiring, as required by the AHJ, may be completed.
- If the knob and tube cannot be eliminated or dammed in the ways listed above, the project must be deferred. It is required for the project to be deferred until a licensed electrical inspection is conducted and the electrical upgrade is confirmed. USDA, Municipal Health Department and Emergency Funds shall be utilized to address this particular health and safety category. Other local funding may be available and utilized.
- If aluminum wiring is present, work on the home will be stopped until the suspect wiring is inspected and determined to be safe by a licensed electrician. After energy retrofit is completed, wiring will be re-inspected by a licensed electrician.

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

Minor or allowable electrical repairs under \$500.00 to complete weatherization is allowable. Repairs over \$500.00 is beyond the scope of weatherization.

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

N/A

**Testing**

- Visual inspection for presence and condition of knob-and-tube wiring.
- Check for alterations that may create an electrical hazard.
- Voltage drop and voltage detection testing are allowed.

**Client Education**

- If electrical hazard is observed, a written Notice of Potential Hazard is delivered to the occupant with specific recommendations to seek professional remedy through a Licensed Electrical Contractor.
- When electrical issues are the cause of a deferral, provide information to client on over-current protection, overloading circuits, and basic electrical safety/risks.

**Training**

DOE Funds will not be used for training. State of Michigan Electrical Board supplies training curriculum.

### 7.10 – Formaldehyde, Volatile Organic Compounds (VOCs), Flammable Liquids, and other Air Pollutants

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#### 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?

- Indoor pollution sources that release gases or particles into the air are a primary cause of indoor air quality problems in homes. Inadequate ventilation can increase indoor pollutant levels by not bringing in enough fresh outdoor air to dilute emissions from indoor sources and by not carrying indoor air pollutants out of the home. High temperature and humidity levels can also increase concentrations of some pollutants.
- 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

- A Notice of Potential Hazard shall be issued to the occupant.
- When air quality is at issue, Indoor Air Quality form shall be issued to the occupant.
- Inform client in writing of observed hazardous condition and associated risks.
- Provide client written materials on safety issues and proper disposal of household pollutants.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

#### Training

How to recognize potential hazards and when removal is necessary and when deferral is required.

### 7.11 – Fuel Leaks

*(please indicate specific fuel type if policy differs by type)*

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#### 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.
- WAP may repair fuel leaks that are the responsibility of the client (vs. the utility) before weatherizing a unit.
- Notify utilities and temporarily halt work when leaks are discovered that are the responsibility of the utility to address.

<b>How do you define allowable fuel leak repairs, and at what point are repairs considered beyond the scope of weatherization?</b>
<ul style="list-style-type: none"> <li>WAP may address fuel leaks up to \$300 in cost.</li> </ul>
<b>Testing</b>
<ul style="list-style-type: none"> <li>Test exposed gas lines for fuel leaks from utility coupling into, and throughout, the home.</li> <li>Conduct sensory inspection on bulk fuels to determine if leaks exist.</li> </ul>
<b>Client Education</b>
Inform clients in writing if fuel leaks are detected.
<b>Training</b>
Fuel leak testing.

<b>7.12 – Gas Ovens / Stovetops / Ranges</b>		<a href="#">Back to First</a>
<b>Concurrence, Alternative, or Deferral</b>		
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>
<b>Funding</b>		
DOE <input checked="" type="checkbox"/>	LIHEAP <input type="checkbox"/>	State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input type="checkbox"/>
<b>What guidance do you provide Subgrantees for addressing unsafe gas ovens/stoves/ranges in homes slated for weatherization?</b>		
<ul style="list-style-type: none"> <li>When testing indicates a problem, entities may perform standard maintenance on or repair gas cooktops and ovens.</li> <li>If repair listed above does not address the issue, all work shall be deferred when the CO reading for the gas oven exceeds 225 ppm or any of the range top burners exceed 100 ppm.</li> <li>A Notice of Potential hazard shall be issued to the occupant.</li> <li>Replacement is not allowed.</li> </ul>		
<b>Testing Protocols</b>		
<ul style="list-style-type: none"> <li>Visual inspection and CO testing for ovens and stovetop burners</li> </ul>		
<b>Client Education</b>		
Inform clients of the importance of using exhaust ventilation when cooking and the importance of keeping burners clean to limit the production of CO.		
<b>Training</b>		
<ul style="list-style-type: none"> <li>Training on how to test the burners for safe combustion and gas leaks in the gas piping in and around the range and oven and seal leaks.</li> <li>Training on measuring CO at the oven in undiluted flue gases.</li> </ul>		

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

*(please indicate material where policy differs by material)*

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#### Concurrence, Alternative, or Deferral

Concurrence with Guidance ☒

Alternative Guidance ☐

Results in Deferral ☐

#### Funding

DOE ☒

LIHEAP ☐

State ☐

Utility ☐

Other ☐

#### Allowability

- 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. When hazard materials (refrigerant, mercury thermostats, lead paint dust/chips, etc.) are generated in the course of weatherization work, proper disposal is required, and removal/disposal costs must be included within the Health and Safety line item.

#### Client Education

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

#### Training

- Appropriate Personal Protective Equipment (PPE) for working with hazardous waste materials.
- Disposal requirements and locations.
- Health and environmental risks related to hazardous materials.

#### 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. When hazard materials (refrigerant, mercury thermostats, lead paint dust/chips, etc.) are generated in the course of weatherization work, proper disposal is required, and removal/disposal costs must be included within the Health and Safety line item.
- Document proper disposal requirements in **contract language** with responsible party.
- Refer to Lead and Asbestos sections for more information on those topics.

### 7.14 – Injury Prevention of Occupants and Weatherization Workers

*(Measures such as repairing stairs and replacing handrails)*

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#### Concurrence, Alternative, or Deferral

Concurrence with Guidance ☒

Alternative Guidance ☐

Results in Deferral ☐

#### Funding

DOE ☒

LIHEAP ☐

State ☐

Utility ☐

Other ☐

When necessary to effectively weatherize the home, workers may make minor repairs and installations, as defined by the Grantee; otherwise these measures are not allowed.

<b>What guidance do you provide Subgrantees regarding allowable injury-related repairs (e.g., stairs, handrails, porch deck board)?</b>
<ul style="list-style-type: none"> <li>Inspect for dangers that would prevent weatherization.</li> <li>A Notice of Potential hazard shall be issued to the occupant.</li> </ul>
<b>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.</b>
<p>Injury prevention refers to minor installations needed to let workers safely access work areas, like replacing a missing or unsafe stair tread on the stairs leading to the attic. This would only be done if work was being done in the attic.</p> <p>Minor repairs needed that are beyond the scope of weatherization must not exceed are defined as under \$200 per job. Repairs that exceed this amount are considered beyond the scope of weatherization.</p>
<b>Training</b>
Hazard identification.

<b>7.15 – Lead Based Paint</b>					Back to First
<b>Concurrence, Alternative, or Deferral</b>					
Concurrence with Guidance <input checked="" type="checkbox"/>		Alternative Guidance <input type="checkbox"/>		Results in Deferral <input type="checkbox"/>	
<b>Funding</b>					
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>	
<p>DOE funds are being used.</p> <ul style="list-style-type: none"> <li>Only those costs directly associated with the testing and lead safe practices for surfaces directly disturbed during weatherization activities are allowable.</li> </ul>					
<b>Safe Work Protocols</b>					
<p><b>Lead Paint</b></p> <p>Lead paint removal is not an allowable activity under the Weatherization Assistance Program.</p> <p>To minimize risks to clients and weatherization personnel:</p> <ul style="list-style-type: none"> <li>Provide clients and workers with Renovate Right Brochure available at <a href="http://www.epa.gov/lead">www.epa.gov/lead</a>.</li> <li>Use lead safe weatherization practices when disturbing lead based paint.</li> <li>Staff and contractors shall assume that any paint on windows and doors contains lead, unless it has been verified otherwise.</li> </ul> <p>All local weatherization operator staff, QC Inspectors, contractors, and crews, must be in compliance with:</p> <ul style="list-style-type: none"> <li>All weatherization contractors, crew persons, Energy Auditors and QC Inspectors are to be, at a minimum, in compliance with EPA LRRP Rule Requirements. Most individuals in these roles must be trained and certified in LRRP or Lead Safe Weatherization (LSW). See Training Requirements section for further details.</li> <li>All Federal, state, and local regulations</li> <li>OSHA rules for worker safety</li> <li>All State and local rules for waste disposal</li> </ul>					

If paint chips/dust results from weatherization work, the area shall be cleaned in accordance with LRRP Practices.

Ingestion or absorption of lead into the blood stream is a serious health hazard causing brain damage over a period of time. This can be a particularly serious problem with small children, who may ingest paint chips or flakes or dust contaminated with lead products. Serious learning disabilities can result from excessive lead levels in the bloodstream. Workers can be contaminated in the same way as children, but are most likely to be exposed by breathing dust created by sanding or planing surfaces that contain lead based paints.

Lead paint is the primary source of lead in a home. Contamination occurs when lead paint is disturbed by sanding, chipping, or flaking.

- LRRP work practices shall be utilized.

If working on a unit with lead paint, always defer to the LRRP rules, regulations and training. In general remember, that as you scrape, drill, cut, open walls, etc., you are creating dust. You can keep dust down by using the right tools and following some simple practices that minimize and control the spread of dust.

- Control the spread of dust per EPA's Renovation, Repair and Painting standards:
  - You must keep the work area closed off from the rest of the home. The work area must be sufficiently isolated and maintained to prevent the escape of dust or debris
  - You must ensure that all personnel, tools, and all other items exiting the work area are free of dust and debris. Don't track dust out of the work area.
- Use work practices that minimize dust:
  - You should mist areas before sanding, scraping, drilling and cutting to keep the dust down (except within 1 foot of live electrical outlets)
  - You should score paint with a utility knife before separating components
  - You should pry and pull apart components instead of pounding and hammering
  - You must keep components that are being disposed of in the work area until they are wrapped securely in heavy plastic sheeting or bagged in heavy duty plastic bags. Once wrapped or bagged, remove them from the work area and store them in a safe area away from the residents
- 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.

#### 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.
- BCAEO's monitors will verify that crews are using lead safe work practices during monitoring.

Client Education
<ul style="list-style-type: none"> <li>• Issue EPA pamphlet or safe work practices around the home.</li> <li>• Follow pre-renovation education provisions for LRRP.</li> <li>• When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.</li> </ul>
Training and Certification Requirements
<p>LSW training is administered through the State of Michigan WAP and is optional when a staff does not have a LRRP Certification. LRRP training provided through EPA accredited trainers.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Grantee Monitors and Inspectors must be Certified Renovators.</li> <li>• <b>Lead Safe Work and Lead Renovator Repair Painting Training</b> <ul style="list-style-type: none"> <li>○ 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. Crews must follow EPA's Lead; Renovation, Repair and Painting Program (LRRP) when working in pre-1978 housing unless testing confirms the work area to be lead free. Different roles in Weatherization have different requirements for Lead Safe Work (LSW) or LRRP training and certification. All required training/certification must be completed within 180 days of the date they are hired. Requirements are as follows: <ul style="list-style-type: none"> <li>▪ Energy Auditors and Quality Control Inspectors <ul style="list-style-type: none"> <li>• Individuals in these roles must receive either LSW or LRRP training and must follow EPA rules.</li> </ul> </li> <li>▪ Mechanical, Electrical and Plumbing Contractors <ul style="list-style-type: none"> <li>• Individuals in this role must follow EPA rules, but there are no training requirements for individuals beyond those listed generally in this section.</li> </ul> </li> <li>▪ Shell Contractors and Crews <ul style="list-style-type: none"> <li>• Individuals in these roles must receive either LSW or LRRP training and must follow EPA rules.</li> </ul> </li> </ul> </li> </ul> </li> </ul>
Documentation Requirements
<p>Documentation in the contractor 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. Client files include photos and Lead Safe Form.</p>

## 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.)

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### 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, down spouts, moisture barriers, dehumidifiers, vapor barrier on bare earth floors) in homes slated for weatherization?**

#### Mold & Moisture Assessment

Molds, mildew and spores are primarily caused by excessive moisture levels in the home. Mold remediation is not an allowable DOE expense. These substances can be a significant contributing factor in a number of health problems. Excessive moisture in a home provides an environment that allows mold and mildew to flourish. Dwellings with serious moisture problems shall not be tightened until measures are taken to mitigate the moisture sources.

Mold and Moisture -- Including but not limited to: drainage, gutters, down spouts, extensions, flashing, sump pumps, dehumidifiers, landscape, leaking roofs, vapor retarders, moisture barriers, etc.

All dwellings shall be checked for previous or existing mold and moisture problems. Audit procedures shall include a mold and moisture assessment, including a mold protocol or checklist. The assessment shall be a visual review that includes these four categories:

- General building envelope
- Outside/Site
- HVAC
- Occupied space

If a vapor barrier cannot be installed in a crawlspace home, the job must be deferred.

#### Testing

- 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.

**How do you define “minor” or allowable moisture-related measures, and at what point is work considered beyond the scope of 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.

Minor moisture-related measures are allowable up to \$250. Vapor barrier installation is also allowable but not subject to the \$250 cap.

#### Client Education

- Visual inspection and issuance of EPA guidelines/pamphlet for remedy.
- Provide client written notification and disclaimer on mold and moisture awareness.
- Provide information on importance of cleaning and maintaining drainage systems.
- Provide information on proper landscape design and how this impacts site drainage and moisture control.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

#### Training

- National curriculum on mold and moisture or equivalent.
- How to recognize drainage issues.

### 7.17 – Pests

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#### 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?

- All work will be deferred until all infestation of pests are eliminated from work site because it poses H&S concern for workers.
- Issue a Notice of Potential Hazard to the occupant.

#### Define Pest Infestation Thresholds, Beyond Which Weatherization Is Deferred

When pests and their byproducts are present and pose a hazard to workers and inspection staff.

#### Testing Protocols

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

<b>Client Education</b>
<ul style="list-style-type: none"> <li>• A Notice of Potential Hazard may be issued.</li> <li>• Inform client in writing of observed condition and associated risks.</li> <li>• When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.</li> </ul>
<b>Training</b>
<ul style="list-style-type: none"> <li>• OSHA training may be utilized.</li> <li>• How to assess presence and degree of infestation, associated risks, and deferral policy.</li> </ul>

<b>7.18 – Radon</b>					<a href="#">Back to First</a>
<b>Concurrence, Alternative, or Deferral</b>					
Concurrence with Guidance <input checked="" type="checkbox"/>		Alternative Guidance <input type="checkbox"/>		Results in Deferral <input type="checkbox"/>	
<b>Funding</b>					
DOE <input type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>	
<b>What guidance do you provide Subgrantees around radon?</b>					
<ul style="list-style-type: none"> <li>• Radon mitigation, as defined in the Michigan Weatherization Field Guide, is not an allowable H&amp;S cost.</li> <li>• Clients must sign an informed consent form prior to receiving weatherization services. This form must be kept in the client file.</li> <li>• 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.</li> <li>• Exposed dirt floors must be covered 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.</li> <li>• 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.</li> </ul>					
<b>Testing Protocols</b>					
No testing for Radon will be done.					
<b>Client Education</b>					
<ul style="list-style-type: none"> <li>• Informed consent form must be signed by all clients and include:             <ul style="list-style-type: none"> <li>○ Information from the results of the IAQ Study that there is a small risk of increasing radon levels when building tightness is improved;</li> <li>○ A list of precautionary measures WAP will install based on EPA Healthy Indoor Environment Protocols;</li> <li>○ Some of the benefits of Weatherization including energy savings, energy cost savings, improved home comfort, and increased safety; and</li> <li>○ Confirmation that EPA's A Citizen's Guide to Radon was received and radon related risks discussed with the client – this guide must be provided to all WAP clients.</li> </ul> </li> </ul>					

Training and Certification Requirements
<ul style="list-style-type: none"> <li>Auditors, assessors and inspectors training on radon includes, what it is and how it occurs, including what factors may make radon worse, and precautionary measures that may be helpful.</li> <li>Workers must be trained in proper vapor retarder installation.</li> <li>A zonal map can be located at <a href="https://www.epa.gov/sites/production/files/2014-08/documents/michigan.pdf">https://www.epa.gov/sites/production/files/2014-08/documents/michigan.pdf</a></li> <li>EPA's "A Citizen's Guide to Radon" can be accessed at <a href="https://www.epa.gov/sites/production/files/2016-02/documents/2012_a_citizens_guide_to_radon.pdf">https://www.epa.gov/sites/production/files/2016-02/documents/2012_a_citizens_guide_to_radon.pdf</a></li> </ul>
Documentation Requirements
Signed acknowledgement form from client

7.19 – Safety Devices: Smoke and Carbon Monoxide Alarms, Fire Extinguishers				
				Back to First
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>		Results in Deferral <input type="checkbox"/>	
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
What is your policy for installation or replacement of the following:				
<p><b>Smoke Alarms:</b></p> <p>Smoke detectors are required as a health and safety measure. When battery powered smoke detectors are installed they shall be installed in accordance with the manufacturer's recommendations, following state and local code requirements. New batteries may be installed in existing working smoke detectors. (Alkaline are recommended)</p> <p>When installing hardwired smoke alarms, it will be listed and labeled in accordance with UL 217 and installed in accordance with the IRC or as required by the authority having jurisdiction.</p> <p><a href="https://sws.nrel.gov/spec/203011">https://sws.nrel.gov/spec/203011</a></p> <ul style="list-style-type: none"> <li>Smoke alarms may be installed where alarms are not present or are inoperable.</li> <li>New installation of hard-wired devices (smoke detectors) as long as it does not include significant spaces (entrances/entry halls/lobbies, areas for public gathering and circulation, primary rooms). If work occurs in a significant space, work shall not damage historic materials or finishes. New wiring shall be concealed.</li> </ul>				

**Carbon Monoxide Alarms:**

Carbon Monoxide (CO) alarms shall be installed in each dwelling unit, regardless of heating type in compliance with NFPA 720 and ASHRAE 62.2. Standard for the installation of CO Detection and Warning Equipment shall be consistent with the requirements of applicable laws, codes, standards, and manufacturer's installation guidelines (reference ANSI/UL 2034-09).

Potentially unsafe CO levels determined during the audit shall be documented and written notice shall be provided to the client/landlord/property owner and documented electronically on the SOM approved field audit. A copy of the notice shall be maintained in the client/job file, Notice of Unsafe Conditions (DHS-4288) is located in the forms section at the end of this manual.

Carbon monoxide alarms shall be installed by the Energy Auditor during the audit in a dwelling under the following circumstances:

- Whenever a local agency must defer work and the dwelling unit contains an unsafe combustion appliance
- A combustion appliance is emitting unsafe levels of CO that cannot be immediately remedied
- A combustion appliance has minimal draft and/or spillage and no CO is being produced
- The dwelling contains a fireplace or wood burning stove that draws combustion air from inside the dwelling.
- CO alarms must be installed where alarms are not present or are inoperable.
- New installation of hard-wired devices (carbon monoxide sensors) as long as it does not include significant spaces (entrances/entry halls/lobbies, areas for public gathering and circulation, primary rooms). If work occurs in a significant space, work shall not damage historic materials or finishes. New wiring shall be concealed.
- When a fuel combustion appliance is present in the dwelling with a garage is attached a carbon monoxide alarm/detector shall be installed in compliance with NFPA 720

<https://sws.nrel.gov/spec/203012>

For further testing requirements refer to CSPM 614 and the Michigan Weatherization Field Guide.

**Fire Extinguishers:**

Where solid fuel burning equipment is present, fire extinguishers may be provided as an allowable H&S measure.

**Testing Protocols**

- All dwellings weatherized shall be tested for CO levels during audits and inspections.
- Tests shall include ambient air checks.
- Levels exceeding 9 parts per million (ppm) shall be documented on the SOM approved audit and corrective action recommended.
- Check existing alarms for operation.
- Verify operation of installed alarms.

**Client Education**

- A Notice of Potential Hazard or Air Quality Standards is issued detailing remedial action the client should take.
- Carbon monoxide alarms: Client education on appropriate test procedures, maintenance, and the proper action to take when alarm is activated.
- Smoke Alarms: Client education on appropriate test procedures, intervals to replace the batteries shall be documented, and the proper action to take when alarm is activated.
- Provide client with verbal and written information on use of devices installed.

#### Training

- Where to install alarms.
- Local code compliance.

### 7.20 – Occupant Health and Safety Concerns and Conditions

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#### Concurrence, Alternative, or Deferral

Concurrence with Guidance ☐ Alternative Guidance ☒ Results in Deferral ☐

#### Funding

DOE ☐ LIHEAP ☒ State ☐ Utility ☐ Other ☐

DOE Funds will not be used. USDA, Municipal Health Department and Emergency Funds shall be utilized to address this particular health and safety category. Other local funding may be available and utilized.

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

Screen occupants to reveal known or suspected health concerns either as part of initial application for weatherization, during the audit, or both. Only one screening is necessary. This screening is the opportunity for clients to self-report health concerns so that the agency can take these into consideration in order to safely address the client's specific Health & Safety concerns.

Screening the client simply means letting them know that the work may cause dust, and asking them if they or anyone in the house has conditions that might be irritated by the work. Then working with them to make sure weatherization does not make it worse.

Due to the COVID-19 pandemic, all subgrantees have created field protocols, which include their protocols for screening clients and workers, and expectations around field practices for safety, including PPE and social distancing.

#### 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. Only one screening is necessary.

Screening the client simply means letting them know that the work may cause dust, and asking them if they or anyone in the house has conditions that might be irritated by the work. Then working with them to make sure weatherization does not make it worse.

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

- 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.
- Failure or the inability to take appropriate actions must result in deferral.
- A Notice of Potential Hazard may be issued detailing specific remedy to observed H&S subject.

**Client Education**

- Inform client in writing of any known risks.
- Provide client with a point of contact information in writing so client can be informed of any issues.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence. A Notice of Potential Hazard may be issued detailing specific remedy to observed H&S subject.

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

CSPM 614 Attachment Hazard Identification and Notification Form  
552 Documentation signed by client.

**7.21 – Ventilation and Indoor Air Quality**

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**Concurrence, Alternative, or Deferral**

Concurrence with Guidance ☒ Alternative Guidance ☐ Results in Deferral ☐

**Funding**

DOE ☒ LIHEAP ☐ State ☐ Utility ☐ Other ☐

DOE funds are being used.

Implementation of ASHRAE 62.2 version 2016 is required. Client refusal of mechanical ventilation, when evaluated and called for pursuant to the Standard, must result in deferral.

**Identify the Most Recent Version of ASHRAE 62.2 Implemented (optional: identify Addenda used)**

All dwellings weatherized shall be evaluated for implementation of program required ASHRAE 62.2 ventilation standard requirements. Compliance requirements (e.g. testing, calculations, fan sizing, fan Sone rating, Whole-home fan flow verification, continuous vs. intermittent fan specifications, file documentation, etc.) shall be performed by the auditor and then verified by the QCI at the final inspection. SOM IWC venting calculations shall be used to determine mechanical sizing requirements. When calculations indicate 15 CFM or less, goals will be considered met and additional mechanical ventilation shall not be added. Method of compliance shall be documented on the 62.2 tab in FACSPRO.

Audit procedures shall include a visual review and discussion with the client relative to potential indoor air quality (IAQ) problems, such as:

- Mold
- Presence of moisture
- Combustion by-products/carbon monoxide
- Unstable lead-based paint
- Friable asbestos

If IAQ problems are found, the client shall be advised and written notification shall be provided to the client, landlord, owner, and/or his/her agent. A copy of the written notice shall be maintained in the client file. Notice of Indoor Air Quality (DHS-4289) is located in the forms section in the CSPM in FACSPRO or on the [www.michigan.gov/bcaeo](http://www.michigan.gov/bcaeo).

Where possible, "incidental repairs" or "health and safety" measures may be completed to correct IAQ problems in order to allow weatherization work to take place. Client education shall be provided where appropriate.

In addition to asbestos, carbon monoxide, and lead based paint which are addressed in later in the Health and Safety Plan, other IAQ concerns may include:

- Volatile Organic Compounds (VOC): Cleaning fluids, paints, solvents, herbicides, pesticides, and formaldehyde. Known to be potential irritants to lungs, eyes, and skin. Some VOCs may be carcinogenic. VOCs are frequently stored under sinks, in closets, and basements. Formaldehyde may be found in a variety of building components including plywood, carpeting, and particle boards. Recommend moving potentially dangerous material outside of living space into sheds or garages. Basements are not recommended for storage, particularly if leaky ductwork exists.
- Fiberglass: Fibrous glass insulation material. Known to be an irritant to lungs, eyes and skin. Most preliminary research indicates no long-term negative health effects resulting from exposure to high levels of fiberglass, but some studies have indicated that some types of finely chopped blown-in fiberglass may be a potential carcinogen. Exposed fiberglass shall not be left in occupied areas of dwellings. Workers are advised to wear properly rated respirators and protective clothing when working with or around fiberglass.
- Raw Sewage/Methane Gas: Workers must take precautions to avoid direct contact with raw sewage or other unsanitary conditions. Clients must be informed of existing conditions and referred to available resources for assistance.

#### **Testing and Final Verification Protocols**

- Implementation of program required ASHRAE 62.2 ventilation standard evaluation to determine required ventilation.
- Measure fan flow of existing fans and of installed equipment to verify performance.
- When the ASHRAE normative Appendix A is employed and an existing fan is being replaced or upgraded to meet to whole-house ventilation requirements, take actions to prevent zonal pressure differences greater than 3 Pascals across the closed door, if one exists.
- When the mechanical ventilation standards cannot be met, alternative ventilation sources will be implemented.
- The unit will be deferred when SHPO or construction barriers prohibit ventilation installation.

#### Client Education

- Energy Auditors and QC Inspectors will discuss ventilation requirements and usage during on-site visits.
- 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.
- Include disclaimer that ASHRAE 62.2 does not account for high polluting sources or guarantee indoor air quality.
- Client education includes location of service switch and cleaning instructions.

#### Training

- Training to implement ASHRAE 62.2 ventilation standards, including proper sizing, evaluation of existing and new systems.
- H&S Training

## 7.22 – Window and Door Replacement, Window Guards

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### Concurrence, Alternative, or Deferral

Concurrence with Guidance ☒Alternative Guidance ☒Results in Deferral ☐

### Funding

DOE ☒LIHEAP ☐State ☐Utility ☐Other ☐

Window and door repair and replacement must be charged in accordance with WPN 19-5. Only window and door repairs may be charged as H&S and must be done so in accordance with the policy below.

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

Window or door repairs are allowable as a H&S measure, if:

- It resolves a bulk water intrusion issue that is the cause of visible biological growth, and;

The H&S Window or Door repair is well documented with written explanation and photos of the biological growth in the client file.

Window or door replacements are not allowable as a H&S measure.

### Testing Protocols

Not applicable

### Client Education



- Provide written information on lead risks wherever issues are identified.
- Energy Auditors and QC Inspectors will discuss window safety glass/guards requirements and usage during on-site visits.

#### Training

- Training is conducted during QC Inspector/Energy Auditor classes.
- OSHA instruction may be provided.
- Awareness of guidance.

### 7.23 – Worker Safety (OSHA, etc.)

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#### Concurrence, Alternative, or Deferral

Concurrence with Guidance ☒ Alternative Guidance ☐ Results in Deferral ☐

#### Funding

DOE ☒ LIHEAP ☐ State ☐ Utility ☐ Other ☐

DOE Support funds can be used to cover these training costs. Training costs are a support cost and will be covered within T/TA budget.

#### 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 agency staff and contractors must maintain compliance with the current OSHA Hazard Communication Standard, including on-site organized Safety Data Sheets (SDS) (formerly called MSDS).
- Monitoring
  - The BCAEO Weatherization Monitors verify that agency, crews and contractors follow safe work practices.

#### Training and Certification Requirements

- Use and importance of PPE.
- Safety training appropriate for job requirements. OSHA 10 hour training meets this requirement.
- Ongoing training as required in Hazard Communication Program.

### 7.24 – Clothes Dryer Venting (Un-vented clothes dryers shall be vented outside)

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#### Concurrence, Alternative, or Deferral

Concurrence with Guidance ☒ Alternative Guidance ☐ Results in Deferral ☐

#### Funding

DOE ☒ LIHEAP ☐ State ☐ Utility ☐ Other ☐

#### Remediation Protocols

Weatherization work measures (except mechanical work orders to resolve the above) shall not be installed until unsafe appliances have been repaired, replaced, or removed.

Clothes dryers shall be vented directly to the exterior. Clothes dryers shall be vented using aluminum or galvanized sheet metal or approved aluminum flex duct (UL labeled) and in accordance with SOM Construction Code. Outdoor dryer vent caps shall have a backdraft damper that closes when the dryer is not being used.

#### **Testing Protocols**

<https://sws.nrel.gov/spec/660051>

<https://sws.nrel.gov/spec/660053>

#### **Client Education**

Client Education will include proper maintenance of the dryer vent and lint tray.

#### **Training**

Training on how to properly vent a clothes dryer.

## Attachment to 618 – Sample Training and Technical Assistance Retention Agreement

THIS TRAINING AND TECHNICAL ASSISTANCE RETENTION AGREEMENT made this \_\_\_\_ day of \_\_\_\_\_, 20\_\_, is by and between AGENCY NAME (hereinafter “CAA”), and \_\_\_\_\_ (hereinafter “Contractor”), for training and technical assistance (hereinafter “T&TA”) towards the cost of the Weatherization Inspector Certification Course (hereinafter “Training Course”) under the Michigan Weatherization Assistance Program (hereinafter “WAP”).

### WITNESS:

WHEREAS, contractors receiving DOE T&TA funds sign a retention agreement that they will provide weatherization services for a specific amount of time that aligns with the funds provided;

WHEREAS, Contractor desires to receive T&TA funds assistance for the Course;

NOW THEREFORE, in consideration of the premises and agreements of CAA and Contractor as hereinafter provided, the parties hereby mutually agree as follows:

1. CAA will provide DOE T&TA funds to cover the cost of Contractor’s participation in the Training Course, limited to the following:
  - a. Reasonable travel costs in accordance with DOE standards;
  - b. **[INSERT OTHER COSTS, IF APPLICABLE]**
2. Contractor shall satisfactorily complete the Training Course and any examinations required thereto;
3. Contractor shall remain actively employed or actively participate in WAP weatherization inspections for a period of no less **than twelve (12) months** following completion of the Training Course.
4. If Contractor does not fulfill his or her obligations under this Agreement, Contractor will reimburse CAA the total T&TA funds drawn within thirty (30) calendar days of notice from CAA. Said reimbursement amount shall become immediately due and payable as a debt and obligation of Contractor to CAA. Repayment will be made in the full amount due as a lump sum. **If payment is not received by CAA within thirty (30) days, CAA may assess reasonable costs of collection, including but not limited to interest, court costs, and attorney’s fees.**
5. If Contractor enrolls in a training course through the State of Michigan and cancels their participation with less than two (2) business days’ notice or does not attend the training, the contractor will be charged any fees associated with that cancellation.

**6. Contractor has read and understands the terms of this Agreement.**

IN WITNESS WHEREOF, the parties hereto have caused this Agreement to be executed the date and year first indicated.

CONTRACTOR:

_____	_____	_____
Signature	Date	
Printed Name:		

AGENCY NAME

_____	_____	_____
Signature	Date	
Printed Name:		
Title:		

## Attachment to 618 – Inspector Field Observation Test House Criteria

If a grantee agency needs to locate a home to accommodate a QC auditor/inspector candidate performing the field test, the following is the field test house criteria:

The stick-build residential home (pre-1978 construction) should include the following:

- Forced air furnace
- Ducted distribution system
- Gas DHW
- At least one natural drafting appliance
- At least one exhaust fan (bathroom)
- Gas line (natural gas or propane)
- Gas range
- Accessible attic with at least some form of attic ventilation (gable, soffit, ridge, etc.)
- Work scope/order for the home/inspection the exam will be conducted on
- Initial audit with diagnostic results for the home/inspection the exam will be conducted on
- Must have someone available to conduct a short interview with
- Site must have had work completed from a comprehensive work scope

## Attachment to 618 – Release of Test Information

I understand \_\_\_\_\_(Sponsoring Agency) is sponsoring me to attend a Michigan Department of Human Services, Bureau of Community Action and Economic Opportunity (DHHS BCAEO) training.

I agree by signing below that the DHHS BCAEO staff is hereby authorized to release information regarding my attendance and test scores to the agency listed above.

Signed: \_\_\_\_\_ Date: \_\_\_\_\_

DHHS BCAEO Witness: \_\_\_\_\_ Date: \_\_\_\_\_

Sponsoring Agency Contact Person: \_\_\_\_\_

Contact Person's Email Address: \_\_\_\_\_

# TRAINING AND TECHNICAL ASSISTANCE (T&TA) PLAN CSPM 618

## 1.0 – GENERAL INFORMATION

COMMENTS THAT DO NOT GENERALLY FIT INTO THE AVAILABLE TABLES BELOW

Training and Technical Assistance activities (T&TA) for both Subgrantee and MDHHS-BCAEO WAP staff are instrumental in the provision of weatherization services to low-income households in Michigan. All MDHHS- BCAEO and MiTEC training and technical assistance activities will have one of the following objectives:

- Provide every client the highest quality of work specified by the comprehensive energy audit
- Maintain and increase the efficiency, quality, and effectiveness of the WAP at all levels
- Maximize energy savings within Michigan's WAP
- Minimize production costs
- Ensure the Health and Safety of low-income households and WAP workers
- Increase the effectiveness of client education
- Improve the quality of weatherization work performed on dwellings
- Improve program management and administrative procedures within Michigan's WAP
- Reduce the potential for waste, fraud, abuse, and mismanagement

### **Comprehensive Training Plan**

Per CSPM 603, the Subgrantee is required to have all staff and contractors completing weatherization work in compliance with the Standard Work Specifications (SWS) outlined in the Michigan Weatherization Field Guide and the Community Services Policy Manual (CSPM). All contracts must have this language included. This includes complying with WPN 15-4, WAP Memorandum 034 and DOE's Comprehensive Training requirements.

Comprehensive Training for Energy Auditor (EA), Quality Control Inspector (QCI), Crew Leader and Retrofit Installer will be required for all WAP workers within their JTA aligned position. MiTEC is responsible for ensuring that Comprehensive Training is provided in accordance with CSPM, Michigan Weatherization Field Guide, WPN 15-4, and WAP Memorandum 034.

Additional training will be recommended or mandated as necessary based upon DOE monitoring results, MDHHS-BCAEO monitoring results, single-audit findings, STAR Assessment, WAP Network data analysis results, and feedback provided from the entities listed below.

MDHHS-BCAEO participates in the following:

- Policy Advisory Committee
- MDHHS-BCAEO technical monitoring staff and reports

- State Plan preparation meetings
- Michigan Weatherization Leadership Committee
- Requests from Michigan's WAP Network
- MiTEC Training Board
- Training class evaluations and feedback
- Compliance with WPN 15-4, WAP Memorandum 034, and all other applicable DOE Program Guidance
- Federal and state auditors and/or reports

## 2.0 – OVERALL T&TA PLAN

YOUR OVERALL T&TA PLAN MUST INCORPORATE SUGGESTIONS AND FEEDBACK THE FOLLOWING ELEMENTS.

### FEEDBACK FROM INTERNAL AND EXTERNAL REVIEWS, EXAMPLES INCLUDE:

- FEEDBACK FROM DEPARTMENT OF ENERGY (DOE) PROJECT OFFICER (PO) MONITORING VISITS
- INTERNAL STATE AUDITS
- GRANTEE MONITORING OF THE SUBGRANTEES
- OFFICE OF INSPECTOR GENERAL (OIG) REPORTS
- AMERICAN CUSTOMER SATISFACTION INDEX FEEDBACK, AND
- OTHER. EXAMPLES INCLUDE:
  - TRAINING FEEDBACK
  - TRAINING RETENTION ACTIVITIES

### Training and Technical Assistance Assessment:

MDHHS-BCAEO staff analyzes financial, production, and weatherization retrofit information on a monthly and quarterly basis. Trends indicating an inability to meet goals such as in production and/or completed weatherization measures will be documented and tracked for appropriate follow up. The monitoring reports are shared with the MiTEC so trainings can be modified or customized based on needs. Onsite visits provide observable evidence for the next level of training and technical assistance needed to improve performance and quality of work.

MDHHS-BCAEO updates and implements policy to ensure compliance with the weatherization assistance program specifically in weatherization technical training for consistent and effective work. The Learning Management System (LMS) is a database with a master list of all weatherization professional students and their associated training records. Reporting and data analysis of the records are being developed to identify the needs of the individuals and the weatherization network working within the program.



**Feedback Summary that influenced the PY 2021 Training Plan:****Feedback from Department of Energy (DOE) Project Officer (PO) Monitoring Visits:**

- Michigan's WAP received on-site monitoring from DOE during PY 2019. In response to the issues discovered during this monitoring visit, the MDHHS-BCAEO is requiring that all WAP Energy Auditors, and QCIs, take CAZ, ASHRAE 62.2 and Mobile Home Weatherization training during PY 2020. MDHHS-BCAEO is requiring that all Crew Leaders and Retrofit Installers/Technicians take Mobile Home training in PY2020. MDHHS-BCAEO will extend the required training into PY 2021. This required training is to ensure that all of Michigan's WAP workforce understands proper duct pan testing and duct sealing, ASHRAE calculations and proper use of calculation forms, and proper CAZ testing for all conditions for those performing the work in client homes.
- There was a period of time during PY 20219 and PY 2020 that Weatherization production work and in-person training was suspended in Michigan. This resulted in not only production slow down, but difficulty in meeting the training requirements outlined in the PY 2020 State Plan. The MDHHS-BCAEO established an extended timeline for the Michigan WAP Network to meet the established requirements. The WAP Network will have until the end of PY 2021 to complete the training requirements implemented following DOE's on-site monitoring visit described above.

**COVID-19 Pandemic Delayed PY2020 Training Plans:**

- There were two different time periods during PY 2020 when MiTEC was unable to perform in-person training. During the second time period, the MDHHS-BCAEO Executive Director secured permission for MiTEC to perform BPI written and field testing as well as ramp up in-person training once again. MiTEC has been performing in-person training and testing since January 11, 2021. MiTEC anticipates that this permission will continue to allow in-person training throughout PY 2021.

**American Customer Satisfaction Index Survey Results:**

- MDHHS-BCAEO has dedicated time and effort to improve performance in the category of Training Provided by Third Parties. When this survey was conducted, MDHHS-BCAEO was in the early stages in planning to develop a Weatherization Training Center. As of July 14, 2020, MDHHS-BCAEO has established an IREC accredited training center. In PY21, MiTEC will hold a robust training program to ensure weatherization professionals are able to apply the building science around weatherization. MiTEC is also working towards improving access to training by holding training classes throughout the state. This will also reduce costs for agencies and contractors. The comments below that helped MDHHS-BCAEO establish a mobile training.
  - "Out of state is often expensive and hard to get."
  - "More locations throughout the state"
  - "Have more options in trainers at facilities that may be closer to our state."
  - "Easier access to training's, and more choices on when available"
- The following comment is helpful for MDHHS-BCAEO to build consistency in the program. The field guide update and the new energy auditor manual was completed in PY20 with a consistency lens.
  - "During conferences and technical monitoring, that a consistent message is being relayed to the sub-grantees. There have been some staff turnover recently, and the message isn't always consistent from one technical staff person to the next. If we are to follow the state plan and the SWS with the Field Guide as working tools, then everyone should be getting the same clear message from the state down to the contractors."
  - "Have one common set of regulations and apply them consistently."

### **Weatherization Leadership Meetings throughout the year has led to the following:**

#### **Michigan WAP Network Expansion Planning:**

The MDHHS-BCAEO is actively working with Michigan's WAP Network on workforce development and expansion. The Comprehensive Training listed in section 4.0 of the training plan takes into consideration the training needs of an expanding Network. The development and implementation of the Performance-Based Training program for crews will generate trained professionals to weatherization. MDHHS-BCAEO is exploring a statewide RFP to contract with weatherization professionals (Energy Auditors, Quality Control Inspectors, and Others) to expand and increase work for single residential dwellings and multifamily jobs. MDHHS-BCAEO would be open to new solutions to network expansion.

#### **Michigan Weatherization Assistance Program Home Energy Professionals Statewide Program:**

MDHHS-BCAEO will implement a statewide home energy professionals' program that will expand the number of energy auditors, quality control inspectors, crew leaders, and other home energy professionals for both single family dwellings and multifamily jobs. The program will create a pathway for individuals that are interested in the field to have an opportunity to be trained and work with seasoned energy auditors, quality control inspectors, and crew leader mentors.

New statewide home energy professionals will be part of an apprentice program before becoming a member of the statewide program. Seasoned energy auditors, quality control inspectors, crew leaders, and other home energy professionals must apply and be awarded a 3-year membership into the statewide program.

Benefits of the program will include:

- Opportunity to accept jobs from all community action agencies operating the weatherization assistance program
- Function independently or part of statewide team
- Statewide professional recognition
- Allowed to post, print, and share Michigan Weatherization Assistance logo on contractor's marketing material
- Assist in building consistency across the WAP network
- Trained on mentoring and coaching new home energy professionals
- Trained on analyzing energy efficiency for contracted jobs
- Assist in analyzing all contracted jobs for high energy savings
- Acknowledged for being responsible for high energy savings
- Additional compensation for working on a statewide defined job, providing mentoring/coaching to new professionals in the field, and submitting training and technical assistance report analysis

#### **Retention Agreement:**

The DOE recommends that a sponsoring agency secure a retention agreement with each sponsored candidate or alternative plan for work in the program. An example of this agreement is included in CSPM 618. Please note that this is a sample agreement, and each Grantee may want to add or refine language. For example, a grantee may insert items in section 1.b. to further list the types of costs associated with training. The time frame of 12 months shown in section 3 is also a guideline and can be adjusted to more accurately align the funds spent on training with the retention period. A Grantee may want to have a retention agreement for any level of training.

**EXISTING OR PLANNED ACCREDITED TRAINING CENTER PARTNERSHIP OR WORKING RELATIONSHIP.****Michigan Training and Education Center (MiTEC)**

MiTEC continues to be a fully operational Weatherization Training Center and carries the responsibility for properly training Michigan's WAP network of providers and technicians.

MiTEC has been established as a state entity. Staff for MiTEC are hired through the Michigan Public Health Institute (MPHI) to function as State of Michigan affiliate staff under the direction of MDHHS-BCAEO in accordance with a contract between the MPHI and the Michigan Department of Health and Human Services (MDHHS). Federal and state procurement policies are followed for the purchase of all relevant goods and services.

**IREC Accreditation**

MiTEC received IREC accreditation July 14, 2020. The IREC accreditation covers the Energy Auditor, Crew Leader, and Quality Control Inspector Job Task Analysis (JTA). Achieving the IREC accreditation allows MiTEC to provide Michigan's Weatherization Network with all required DOE Comprehensive and Specific training.

MiTEC submitted a total of 15 classes with their IREC application. All 15 classes were designed through a curriculum development process that resulted with them being aligned with at least one of the Job Task Analysis (JTA) for Energy Auditor, Quality Control Inspector and/or Crew Leader. All 15 classes submitted with MiTEC's application were accredited by IREC. MiTEC is an IREC accredited training center providing a learning style approach to weatherization technical training and development. Classroom instruction, written and visual materials, hands on instruction, online trainings, and field experience provide a wide range of options to accommodate varied learning styles for adult learners.

Below is a complete listing of the MiTEC's comprehensive courses accredited by IREC.

- Energy Auditor
- Quality Control Inspector
- Crew Leader
- NEAT/MHEA Setup and Maintenance
- NEAT/MHEA Data Entry
- Advanced Air Sealing
- Zone Pressure Diagnostics (ZPD)
- Combustion Appliance Zone (CAZ)
- ASHRAE 62.2
- Dense Pack Insulation
- Mobile Home Weatherization
- Foundation Insulation
- Venting and Combustion Air
- Mechanical Systems Inspection for Auditors
- Weatherization 101

The MDHHS-BCAEO Executive Director supervises the MiTEC Director and by extension the MiTEC staff. MiTEC staff participate in all Weatherization Assistance Program's committees, team projects, field guide and audit tool reviews, conferences, webinars, and meetings that support implementation of the annual U.S. Department of Energy's approved State Plan.

MiTEC is currently staffed with the following positions:

- Director
- Deputy Director
- Program Assistants (Two each)
- Technical Instructors (Four – one to be hired in spring/summer 2021)
- HVAC Instructor (to be hired in spring/summer 2021)
- Weatherization Coordinators (3)

The above positions represent years of WAP experience in instruction, measure installations, and Subgrantee and Grantee program management.

MiTEC staff either participate in or have knowledge of annual risk assessments, monitoring results, corrective actions, follow-up training activities, policy updates, state plan preparation, data gathered from subgrantee application documents and technical assistance that is managed by the MDHHS-BCAEO. Information from these activities is the basis for annual curriculum development, course work enhancements, class scheduling, and new classes.

MiTEC utilizes a Learning Management System (LMS) for class registration, management of MiTEC's student portal, and student training records. Reports from the LMS system are used to track and manage student success.

MDHHS-BCAEO, through the establishment of the MiTEC, is responsible for all of Michigan's T&TA needs. MiTEC will provide both comprehensive and specific training in accordance with WPN 15-4, Memorandum 034, Memorandum 050, and BCAEO policy requirements.

During PY 2019, a MiTEC Training Board was established. This board is comprised of individuals from Michigan's Weatherization Assistance Program. The primary role of the training board is visionary and advisory. The training board's role will ensure training and technical assistance activities offered by MiTEC will maximize energy savings, minimize production costs, improve program management and crew/contractor quality of work, and reduce the potential for waste, fraud, abuse, and mismanagement. The MiTEC Training Board meets on a quarterly basis.

Steve Christensen, Wayne Metro Weatherization Manager  
 Naomi Fletcher, MDS Weatherization Manager  
 Heidi Johnson, Washtenaw Weatherization Manager  
 Sandy Klank, Southwest Weatherization Manager  
 Steve Schuster, Macomb Weatherization Manager  
 Roger Strickfaden, Kent County Weatherization Manager  
 Justin Walls, Mid-Michigan Weatherization Manager  
 Tom Andrews, MiTEC Deputy Director  
 Ray Judy, MiTEC Director  
 Maddy Kamalay, BCAEO Weatherization Specialist  
 Kris Schoenow, BCAEO Executive Director

#### **Training and Technical Assistance Resources for MiTEC:**

Funding for MiTEC activities is provided through the Michigan Public Health Institute as part of the Training and Technical Assistance allocation to the State of Michigan. Annual funding of MiTEC is determined at the time of the DOE allocation. MiTEC has been established as a mobile training center that utilizes locations regionally throughout the state of Michigan to ensure that student's travel costs are minimized to subgrantees.

Training and Technical Assistance funds also supports local subgrantees to initiate training and to make effective use of MiTEC. To assure coordination of training activities, all Training and Technical Assistance funds are planned and budgeted:

**Training and Technical Assistance Funding can cover:**

- Costs for travel for attendance at MiTEC trainings, seminars, meetings, or classes.
- Supplemental training not offered by MiTEC. Training must relate directly to the student's 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.

**Training Schedule:**

The training schedule is updated on a quarterly basis and made available to the MiTEC website through the website link at [www.michigantec.org](http://www.michigantec.org). MiTEC is close to reaching their one-year establishment date with a staff team holding more than 30 years of experience in the development and implementation of weatherization program and training standards at both the state and federal level. MiTEC staff participates in weatherization leadership meetings and policy advisory council meetings to update technical standards and update training curriculum. Courses in building science, retrofit energy efficiency measures, CAZ, mechanical inspection/repair, ASHRAE, air sealing, insulation, mold/moisture, asbestos, and lead safety are provided with health and safety training integrated into classes.

**Instructors:**

Each of the instructors are professionals in their fields and hold the BPI Test Proctor credentials.

**Certification and CEUs:**

Training and certification requirements are provided by MiTEC and include the competencies, knowledge, skills, and abilities for a skilled workforce necessary to perform quality work in the field as described in the JTA identified by NREL.

Continuing Education Units (CEUs) will be made available to subgrantees and students to ensure knowledge, skills, abilities, and technical competencies remain current. Courses offered reflect a commitment to lifelong learning and skill building.

**Training Material:**

MiTEC is responsible for creating training materials including technical documents, visual illustrations and charts, instructor and student manuals, and digital media presentations. The training professionals also design and build the props and learning tools for specific hands-on instruction. An example of this would be the demonstration model "prop trailer" retrofitted into a mobile trailer allowing simulated diagnostic testing and hands-on training to be conducted in a controlled environment regionally.

**Attendance and Requirements:**

Attendance at state sponsored trainings, meetings, webinars, and conferences may be required based on identified need, program deficiencies, and/or to ensure competence in specific areas. In such cases, subgrantee attendance will be required as a matter of program compliance.

**Training Cancellation Costs:**

Any contractor or staff that registers for a training course through MDHHS-BCAEO MiTEC is obligated to attend that training. If a contractor or staff person needs to cancel his or her attendance at a training, he or she must

cancel the registration with MDHHS-BCAEO MiTEC with greater than two business days' notice. If the contractor or staff person cancels with less than two business days' notice or does not attend the training without informing BCAEO/MiTEC, the Grantee will be charged a fee of \$100. MiTEC will issue a cancellation fee invoice to agency within 2 weeks. This fee is not an allowable Training and Technical Assistance expense and must be paid by unrestricted/nonfederal funds.

**PREPARATIONS FOR FUTURE/UPCOMING PROGRAM REQUIREMENTS, EXAMPLES INCLUDE:**

- **UPDATED STANDARD WORK SPECIFICATIONS (SWS)**
- **MIGRATION TO ONLINE WEATHERIZATION ASSISTANT**
- **INCLUSION OF SPECIFIC LANGUAGE FROM WEATHERIZATION PROGRAM NOTICES (WPN)**

**Weatherization Field Guide and 2020 SWS**

Michigan's Weatherization field guide is being reviewed and updated to align with the 2020 SWS items for submission to DOE on April 2, 2021, with anticipated approval by early July 2021. The updated field guide was a template from Saturn with many edits from Michigan's technical staff for our state specific program. Michigan's technical staff are also reviewing the previously approved variances to ensure that any items which need to be maintained are resubmitted to DOE. Some items from previously approved variances were resolved with the updated SWS while others may be re-requested by Michigan. Once our draft field guide is approved by DOE, Michigan will begin following this updated guidance in the field.

**Migration to Online Weatherization Assistant**

Full NEAT and MHEA (WA v10) transition will be completed by July 1, 2022.

MiTEC is responsible for delivering training to prepare Michigan's WAP for the transition to WA v10. The MDHHS-BCAEO has determined that this transition will take place at the start of PY 2022 (July 1, 2022). MiTEC will follow the timeline related to release of training materials outline in WAP Memorandum 074. In following this timeline, MiTEC is currently working on ensuring all instructors are trained in WA v10 as training becomes available and information is released by DOE and ORNL. MiTEC will also strive to have the appropriate participation in the WAP Training Providers Summit tentatively scheduled for July 2021.

**Conversion Planning Timeline:**

ORNL Goals	MiTEC Tasks	Timeline
Conversion Curriculum Release	Develop Michigan's conversion handbook and classes based on curriculum materials for users released by ORNL in March 2021	March – July 2021
Identify and engage Training Providers to solicit input on materials to be developed for Core Curriculum	Prepare a list of key items to share in the development of the Core Curriculum	April 2021
Present training curriculum plan and materials at the WAP Training Providers' Summit	Participate in WAP Training Providers' Summit	July 2021
	Develop a pilot group to test WA v10 in Michigan	August – October 2021

Core Curriculum Release	Train all MiTEC instructors and weatherization MDHHS-BCAEO Staff  Finalize the integration of the Core Curriculum into all user materials, classroom presentations, and handbooks	September 2021
	Develop, implement, and test MDHHS-BCAEO conversion strategies which includes policy updates, technology base configurations, and data security.  Dashboard development will start as the pilot group enters jobs into WA v10.	September 2021
	Pilot group meeting to discuss conversion strategies	September 2021
	Discuss Core Curriculum and collect feedback in a virtual meeting. Collect information and share information from pilot groups at the meeting.	October 2021
Host train the trainer events	All MiTEC instructors and weatherization MDHHS-BCAEO staff will attend a train the trainer event.	November 2021
	Update Core Curriculum	November 2021
	Implement training schedule	December – July 2022

#### **Implementation Training Schedule for Weatherization Network:**

MiTEC will incorporate these instructional opportunities heavily into their Q1 (January-March) and Q2 (April-June) 2022 training schedules. MiTEC anticipates these opportunities being held regionally throughout Michigan with coordination targeting Energy Auditors and WAP Managers who routinely work together. The following is a proposed schedule of trainings:

- January 2022 – 2 events
- February 2022 – 3 events
- March 2022 – 3 events
- April 2022 – 4 events
- May 2022 – 4 events
- June 2022 – 4 events

MiTEC is planning a Spring Technical Conference in 2022. Several sessions at the conference will focus on WA v10 to prepare Michigan's WAP Network of upcoming training opportunities and the expectations regarding the transition in July 2022, including a feedback session.

Approximately 1-3 agencies will pilot WA v10 starting in August 2021 to ensure functionality of the new software is understood, software can be accessed throughout the state, and availability of real time data.

#### **WHAT PROTOCOLS ARE IN PLACE WHICH ENSURE UNTRAINED STAFF ARE NOT LEFT WITHOUT SUPERVISIONS DURING FIELD OPERATIONS?**

**Community Services Policy Manual (CSPM):** The CSPM requires very specific training and certification to fulfill the requirements of the work in the field. No untrained staff is allowed in the field without supervision as noted in the CSPM. CSPM 618.1 and 618.2 (Annual contract language requires subgrantees to implement all CSPMs).

#### **Quality Control Inspectors (QCI)**

QCIs working for, or contracted by, the WAP must possess the knowledge, skills, and abilities in the NREL Job Task Analysis for QCIs. This applies to all individuals who perform an evaluation and sign off on work performed in homes. The QCI has no involvement in the prior work on the home, either as the auditor or as a member of the crew. All QCIs performing final inspections must have an IREC accredited Quality Control Inspector Certification.

#### **Single Family:**

QCI competency is demonstrated by certification as a Home Energy Professional Quality Control Inspector.

QCIs can be employed by third party organizations or subgrantees; however, the subgrantee is ultimately responsible for ensuring that every completed unit reported meets the quality guidelines required by the Weatherization Assistance Program. The subgrantee must provide in their subgrantee plan a policy for validation of the QCI credentials.

The subgrantee must have policies and procedures in place to address situations where a QCI is not inspecting units using the standards adopted by the subgrantee and consistent with the SWS and JTA. The policy must include monitoring of the QCI and procedures for disciplinary action if the subgrantee inspection protocols are not followed.

#### **Energy Auditors**

The Energy Auditor must possess the knowledge, skills and abilities in the National Renewable Energy Laboratory (NREL) Job Task Analysis for Energy Auditor. If a candidate holds the BPI Energy Auditor certification, they may perform energy audits. It is the Grantee's responsibility to ensure the Energy Auditor can perform all tasks related to the WAP including WA8, FACSPRO, IWC policy requirements, and ensuring performance and skills meet the requirements of the WAP.

Individuals who currently possess a SOM Energy Auditor Certification (pre PY21) who fail to obtain a HEC Energy Auditor Certification by June 30, 2022 or individuals with a SOM Energy Auditor Certification who fail to obtain a HEC Energy Auditor Certification within 18-months, will no longer be allowed to perform energy audits in Michigan's WAP.



All Energy auditor candidates must be sponsored by one of the Grantee agencies in the Michigan WAP network. The sponsoring Grantee will be responsible for the field training necessary to prepare candidates sufficiently for other required training and testing.

### **Crew Leader (Single Family)**

A Crew Leader is responsible for supervising the retrofitting activities specified in the scope of work. They are responsible for interacting with the client plus managing personnel and materials on the job site in a safe and effective manner. The Crew Leader is responsible for quality control, testing procedures, documentation, and conducting a final walk through to ensure that all work is completed in a satisfactory manner. It is the subgrantees responsibility to ensure that all untrained staff must not be left without supervision in the field during weatherization.

### **Retrofit Installer (Single Family)**

A Retrofit Installer/Technician installs energy-efficiency measures to single family or 2-4 unit-homes using a variety of building science best practices to improve, safety, comfort, durability, indoor air quality, and energy efficiency. Knowledge, skills, and abilities for a retrofit installer are contained in the Crew Leader JTA, "Domain 3: Implement Scope of Work". It is the subgrantees responsibility to ensure that all untrained staff must not be left without supervision in the field during weatherization.

Required trainings and/or certifications by JTA in Michigan WAP Network:

<b>Training &amp; Certification</b>	<b>Type</b>	<b>Retrofit Installer</b>	<b>Crew Leader</b>	<b>Energy Auditor</b>	<b>QCI</b>	<b>Notes</b>
Retrofit Installer	Comprehensive Training	Required				MiTEC accredited course
Crew Leader	Comprehensive Training		Required			MiTEC accredited course
Energy Auditor	Comprehensive Training			Required		MiTEC accredited course
Quality Control Inspector	Comprehensive Training				Required	MiTEC accredited course
State of Michigan Energy Auditor	Specific Training			Required		MiTEC Course Required for all individuals performing energy audits while pursuing the BPI Energy Auditor Certification (limited to 18 months)
State of Michigan Energy Auditor Certification	Required Certification			Required		SOM Energy Auditor Certification valid for an 18-month grace period prior to obtaining BPI Energy Auditor or BPI QCI Certifications

BPI HEC Energy Auditor Certification	Required Certification			Required		
BPI Quality Control Inspector Certification	Required Certification				Required	
EPA's Lead Renovation, Repair, and Painting Certification/EPA Firm License	Required Certification					See CSPM 618
Advanced Air Sealing	Comprehensive Training					MiTEC Course
Air Sealing & Dense Pack Wall Insulation	Comprehensive Training					MiTEC Course
ASHRAE 62.2 Standards	Comprehensive Training			Required	Required	MiTEC Course
CAZ Pressure Diagnostics	Comprehensive Training			Required	Required	MiTEC Course
Dense Pack Insulation	Comprehensive Training					MiTEC Course
Energy Auditor: Norms & Best Practices	Specific Training					MiTEC Course
Foundation Insulation	Comprehensive Training					MiTEC Course
Lead Safe Work Practices (LSW)	Specific Training	Required	Required	Required	Required	LRRP may substitute for this training for an individual
Health and Safety Training	Specific Training	Required	Required	Required	Required	MiTEC Course Includes health and safety training and indoor air quality/mold (formally known as IAQ)
Mechanical Systems Inspection for Auditors (MSIA)	Comprehensive Training					MiTEC Course
Mobile Home	Comprehensive Training	Required	Required	Required	Required	MiTEC Course
NEAT/MHEA Setup and Data Entry	Comprehensive Training					MiTEC Course
OSHA 10 Hour	Specific Training	Required	Required	Required	Required	Online Training OSHA 30 may substitute for this training requirement for an individual

Venting & Combustion Air	Comprehensive Training					MiTEC Course
Weatherization 101	Comprehensive Training					MiTEC Course
Zone Pressure Diagnostics	Comprehensive Training					MiTEC Course
Client Education	Specific Training					MiTEC Course

### Performance-Based Training

MDHHS-BCAEO will establish a performance-based training program for retrofit installers. The training program's focus will target specific performance outcomes rather than teaching broadly applicable skills and knowledge that students then must figure out how to apply on the job.

Training will target specific work outputs for performance improvement and quality work. By focusing on the work outputs as program objectives, best practice, and quality performance, the training is directly relevant to outputs required on the job. The training will make it easier to identify specific behaviors, skills, and insight needed including best practices to achieve a specific outcome. Training material and hands-on practices both in the classroom and on the job are key components to the performance-based training approach.

Performance-Based modules will be created to achieve targeted specific work outputs. Students successfully obtaining the performance level of the performance-based module, by accomplishing the required trainings and field competency demonstration with a certified mentor, will be acknowledge for their achievement. A formal performance-based module certification will be issued after all components of the program is completed, competency of the targeted specific work outcomes is mastered, a final field competency review is completed, and MDHHS-BCAEO approves the performance-based achievement report signed by the field mentor and student.

The field mentor must demonstrate the specific work outputs for performance-based modules to be certified. Each field mentor will be required to mentor/coach, evaluate, and provide feedback to the student.

### Performance-Based Training Modules and units (examples – still under development)

**Performance-Based Training Course Components:** Each Performance-Based Training Course consists of several modules and units. MiTEC instructors will conduct training on each module. MiTEC will create or identify short online videos for each unit within the modules of the course. Modules will be classroom style or online. After training, students will coordinate with their field mentor and the assigned MDHHS-BCAEO coordinator to practice new skills to obtain quality work performance demonstrated in the work outcome. Upon achievement of the targeted specific work outputs for a module the student will earn a performance-based module certification. When all modules have

been achieved, students are encouraged to continue advancing their skills and work towards additional certifications.

**Student Enrollment:** Student will use the LMS system to enroll into the program. Within 48-hours the student will receive a packet of information on the program. The student will be assigned to a weatherization coordinator. An initial meeting will be scheduled to complete an assessment to determine the best method for the student's training approach and field work, identify a field mentor, and setup a training schedule timeline.

**Performance-Based Training Course Time Investment:** Each module contains several units which may require additional time to complete. The time commitments for a module are listed below and are only suggestions.

- Training Options
  - MiTEC in person class (1-day for one or more modules)
- Training videos (15 – 25 minutes of online video per unit, 2 – 4+ hours per module)
- Weatherization Coordinator Calls (10 minutes every other week)
- Field Mentor (10 – 30 minutes on job site as needed)
- Final field evaluation (1 – 2 hours)

#### **Retrofit Installer Performance-Based Modules and Units:**

##### **Pre-requisites:**

- Students must be working in the weatherization assistance program
- Student is associated with a weatherization operator
- Student must have access to a field mentor on the job

##### **Required Classes:**

- ASHRAE 62.2
- Lead Safe Work Practices (LSW) or LRRP
- Health and Safety Training
- OSHA 10 Hour

##### **Core Comprehensive Classes:** (Student may select in person or performance-based modules)

In person Classes:

- Weatherization 101
- Air Sealing
- Dense Pack Insulation
- Foundation Insulation
- Mobile Home Weatherization

**Performance-Based Modules:**

1. Pre-Weatherization Field Work: Job Work Standards Preparation
  - a. Work Rules
  - b. Standard Work Specifications
  - c. Materials
  - d. Equipment/Tools
2. Job site Readiness and Maintenance
  - a. Job Site Safety
  - b. Health and Safety
  - c. COVID-19 Protocols
  - d. Equipment/Material Setup
3. Quality Work Performance
  - a. Air Sealing Measures
  - b. Loose Fill Insulation
  - c. Moisture Barriers
  - d. Mechanical Ventilation Systems
  - e. Mechanical Systems
  - f. Combustion Appliance Safety
  - g. Dense Pack Insulation
  - h. Windows, Doors, and Attic Hatches
  - i. Electrical Installation for Weatherization
  - j. Plumbing Installation for Weatherization
  - k. Roofing and Flashing
4. Post Weatherization Field Work: Job Site Review
  - a. Accounting for and maintenance of tools/equipment/material
  - b. Job Site Review and Clean-up

**MDHHS-BCAEO Performance-Based coordination with the Weatherization Assistance Program Network:**

- Weatherization Coordinators will administer the cohorts of students enrolled in the program-based modules and the field mentors
- Weatherization Coordinators and MiTEC will review competency accomplishments for performance-based module achievement
- MiTEC will train program-based modules in the classroom and in the field
- MiTEC will train the field mentors for the program-based modules

**PARTNERSHIPS WITH THE STATEWIDE HOME PERFORMANCE INDUSTRY ON TRAINING ISSUES; IF APPLICABLE.**
**Michigan's Energy Waste Reduction (EWR)**

EWR, created under Public Act 295 of 2008, as amended by Public Act 342 of 2016), also known as the clean and renewable energy and energy waste reduction act, requires all-natural gas and electric utility providers in the state to implement programs for their customers to reduce overall energy usage by specified targets, in order to reduce the future cost of service to utility customers.

Training: Weatherization, energy efficiency, and technical measures.

**Michigan Climate and Health Adaptation Program (MICHAP)**

The Michigan Department of Health and Human Services Division of Environmental Health established the MICHAP. MICHAP is charged with protecting the health of Michigan's citizens from threats related to climate change, with support and guidance of the Centers of Disease Control & Prevention's – Climate Ready States & Cities Initiatives.

Training: Weatherization and energy efficiency.

**Low-Income Home Energy Assistance Program (LIHEAP)**

The Michigan Department of Health and Human Services, as the designated lead agency responsible for the administration of these federal funds. The components of Michigan's energy assistance effort and the responsible agency for each are as follows:

- Home Heating Credit: Department of Treasury
- Crisis Intervention: MDHHS
- Weatherization Assistance Program: MDHHS

Training: Weatherization, energy efficiency, technical measures, and client education.

**Michigan Energy Assistance Program (MEAP)**

MEAP, created under Public Act 615 of the Michigan Public Acts of 2012. The purpose of the MEAP is to establish and administer programs statewide that provide energy assistance and self-sufficiency services to eligible low-income households. Self-sufficiency services include assisting participants with the following:

- Paying their bills on time;
- Budgeting for and contributing to their ability to provide energy expenses, which may include enrollment into an affordable payment plan (APP);
- And utilizing energy services to optimize on energy efficiency.

Training: Client education

**American Society of Heating, Refrigerating and Air Conditioning (ASHRAE) Member**

ASHRAE is an organization overseeing and developing ventilation standards.

**Air Conditioning Contractors of America (ACCA)**

ACCA advocates for the HVAC industry, provides HVAC training opportunities, assists with HVAC related accreditations, and is active with HVAC standards and codes.

**Energy Out West (EOW)**

EOW is an organization comprised of Weatherization Assistant Program (WAP) professionals from across the country. EOW develops and delivers a national Weatherization training conference every two years. In addition to providing the training conferences, EOW works with DOE and NASCSP to provide technical assistance and support to efforts in Congress regarding funding and instruction related to the WAP.

**International Code Council (ICC)**

The ICC nonprofit association provides a wide range of building safety solutions included product evaluation, accreditation, certification, codification, and training. They develop model codes and standards used worldwide to construct safe, sustainable, affordable, and resilient structures.

**Building Performance Institute (BPI)**

BPI is the certifying body for DOE for the Energy Auditor, Quality Control Inspector, Crew Leader and Retrofit Installer Certifications. BPI also oversees DOE Weatherization Training Centers to become BPI Test Centers.

**National Renewable Energy Laboratory (NREL)**

NREL advances the science and engineering of energy efficiency, sustainable transportation, and renewable power technologies and provides the knowledge to integrate and optimize energy systems. NREL is one of many laboratories utilized by DOE in energy efficiency research in cooperation with the Weatherization Assistance Program. NREL works closely with DOE in development of program management training for WAP.

**Oak Ridge National Laboratory (ORNL)**

ORNL is the largest US Department of Energy science and energy laboratory, conducting basic and applied research to deliver transformative solutions to compelling problems in energy and security. ORNL works closely with DOE in the development and ongoing management of the NEAT/MHEA energy audit tool. They provide training and technical assistance to WAP Grantees related to the Weatherization Assistant (WA) line of energy audit software.

**HOW DOES ANALYSIS CONDUCTED, AS DETAILED IN SECTION V.6 OF THE ANNUAL APPLICATION, INFLUENCE THE DEVELOPMENT OF T&TA ACTIVITIES AND PRIORITIES?**

**Analysis for State Training and Technical Assistance:**

MDHHS-BCAEO completes the following reviews to provide insight on the training needs of the network:

- Local training activities and local training and technical expenditure reports
- MiTEC monthly attendance and monthly training reports
- MiTEC quarterly training schedule
- Monthly review of MiTEC to measure and track training effectiveness
- Onsite monitoring of local programs
- Review of local Training and Technical Assistance, Certifications, Licenses, and activities
- All students show a certificate of completion for completing each class, which are maintained by subgrantees, students, and MiTEC and reviewed by MDHHS-BCAEO Weatherization Technical Monitors
- Feedback from subgrantees is used to direct training, technical assistance, field guidance, and policy
- Monitoring reports are shared with MiTEC, subgrantees, and the board chair.
- The MiTEC Board will meet quarterly to discuss training issues and requirements and to direct and improve the process of training the weatherization network.
- MDHHS-BCAEO is working towards calculating effectiveness in energy efficiency of weatherized jobs through pre- and post-utility data collection and training on an energy efficiency model
- MDHHS-BCAEO evaluates production and expenditure goals on a quarterly basis and shares results with the subgrantees which has been a method of continuous improvements, efficient and effective processes, and strong training commitment from the network



### 3.0 – WORKFORCE CREDENTIALS

DESCRIBE THE FOLLOWING ASPECTS OF YOUR T&TA PLAN RELATED TO WORKFORCE CREDENTIALS.

#### FEDERALLY REQUIRED CREDENTIALS. EXAMPLES INCLUDE:

- ENVIRONMENTAL PROTECTION AGENCY LEAD RENOVATION, REPAIR, AND PAINTING PROGRAM
- HOME ENERGY PROFESSIONALS' QUALITY CONTROL INSPECTOR CERTIFICATION

Michigan ensures subgrantee's technical weatherization staff has the qualifications and skills to meet the DOE identified National Renewable Energy Laboratories Job Task Analysis (JTAs) for each position as outlined in WPN 15-4 and WAP Memorandum 034.

#### HEC Quality Control Inspector Certification: (Required)

The Home Energy Professional (HEP) Quality Control Inspector certification is offered by BPI and is supported by the U.S. Department of Energy (DOE) and its National Renewable Energy Laboratory (NREL). By earning the HEP Quality Control Inspector certification, an individual proves that they can verify the compliance of retrofit work performed based on work plans and standards, conduct audits and inspections using diagnostic equipment, and can develop reports that specify corrective actions to achieve whole house performance. To qualify for the HEC Quality Control Inspector Certification, an individual must possess a HEC Energy Auditor Certification.

#### EPA Lead Renovation, Repair and Painting (LRRP) Certification: (Required)

The US Environmental Protection Agency (EPA) produced the Lead Renovation, Repair and Painting Program that requires each job have an EPA Certified Renovator on-site during job set up and completion. The certified person is responsible for documenting that all work is done in a lead safe manner. LRRP Certification, in general, covers the following activities that disturbs in pre-1978 housing and child-occupied facilities:

- Remodeling and repair/maintenance
- Electrical work
- Plumbing
- Painting preparation
- Carpentry
- Window replacement

Weatherization installation must be overseen by an EPA Certified Renovator. In order to comply with EPA rules, shell contractor companies and agencies that employ crews must hold the EPA firm license in addition to requirements for individuals. Different roles in Weatherization have different requirements for Lead Safe Work (LSW) or LRRP training and certification. All required training/certification must be completed within 180 days of the date they are hired.

#### OSHA-10 Hour Training Completion Certification: (Required)

Occupational Safety and Health Administration 10-hour completion certification will ensure basic work safe environment practices are applied and how to avoid workplace hazards by weatherization workers. New staff (Energy Auditors/QC Inspectors and agency crews/contractors) are required to attend training within 180 days of the date they are hired.

#### GRANTEE/STATE REQUIRED CREDENTIALS. EXAMPLES INCLUDE:

- BUILDING PERFORMANCE INSTITUTE BUILDING ANALYST
- GRANTEE-DEVELOPED CERTIFICATIONS

Michigan ensures subgrantee's technical weatherization staff has the qualifications and skills to meet the DOE identified National Renewable Energy Laboratories Job Task Analysis (JTAs) for each position as outlined in WPN 15-4 and WAP Memorandum 034.

**Interstate Renewable Energy Council (IREC) Accreditation**

MiTEC became a IREC accredited training center on July 14, 2020 to conduct training on the following JTAs:

- Retrofit Installer
- Crew Leader
- Energy Auditor
- Quality Control Inspector

Michigan's technical field staff must participate in Comprehensive Training in alignment with their JTA every three years. MiTEC's training records are stored in the Learning Management System to track all credentials.

**HEP Retrofit Installer Technician: (Optional)**

The Home Energy Professional (HEP) Retrofit Installer Technician certification is offered by BPI and is supported by the U.S. Department of Energy (DOE) and its National Renewable Energy Laboratory (NREL). Those who become a certified Retrofit Installer Technician prove by passing vigorous examinations that they can properly install residential envelope air sealing, HVAC duct sealing, insulation, windows and doors, mechanical ventilation, and roofing upgrades in single family homes and small multifamily housing.

**HEP Crew Leader Certification: (Optional)**

The Home Energy Professional (HEP) Crew Leader certification is offered by BPI and is supported by the U.S. Department of Energy (DOE) and its National Renewable Energy Laboratory (NREL). The HEP Crew Leader certification demonstrates advanced competency through rigorous written and field exams, and work experience prerequisites. By obtaining the Crew Leader certification, an individual will have the ability to ensure the quality, and supervision, of the installation and performance of prescribed energy efficiency upgrades, as laid out in a scope of work.

**HEP Energy Auditor Certification: (Required)**

The Home Energy Professional (HEP) Energy Auditor certification is offered by BPI and is supported by the U.S. Department of Energy (DOE) and the National Renewable Energy Laboratory (NREL). The HEP Energy Auditor certification demonstrates advanced competency through rigorous online and field exams, and work experience prerequisites. Once certified, an individual will be able to evaluate the energy efficiency, health, and safety of a home. Energy Auditors will obtain in-depth knowledge of how to use diagnostic equipment and modeling software to identify areas for energy savings, produce an audit report, and develop a prioritized scope of work. Getting the Energy Auditor certification automatically earns you the BPI Building Analyst (BA) certification.

**State of Michigan Energy Auditor Certification: (Required until HEP Energy Auditor Certification is achieved)**

The State of Michigan Energy Auditor certification is offered by MiTEC to ensure energy audits can be completed with knowledgeable individuals until the HEP Energy Auditor Certification can be achieved. Typically, the SOM Energy Auditor Certification valid 18 months. The SOM Energy Auditor certification demonstrates competency through training, an onsite field exam, and work experience prerequisites. Once certified, an individual will be able to conduct energy audits for 18 months while working towards achieving the HEP Energy Auditor Certification through BPI.

**ASHRAE 62.2 Standards Certification of Completion: (Required)**

ASHRAE Standards 62.2 certification of completion will address ventilation and acceptable indoor air quality in low-rise residential buildings. Energy Auditors and Quality Control Inspectors will be required to achieve an ASHRAE 62.2 certification of completion. Individuals will be able to understand ASHRAE calculations, proper use of calculation forms, and ventilation requirements and techniques to achieve compliance. All WAP Energy Auditors and QCIs must achieve the ASHRAE 62.2 certification of completion during PY 2021 unless the certification of completion was achieved in PY2020 or PY 2019.

**Combustion Appliance Zone Certification of Completion: (Required)**

Combustion Appliance Zone (CAZ) certification of completion will ensure the safety of agency staff, weatherization contractors, and occupants. Individuals will understand the Building Performance Institute (BPI) standards for combustion safety test procedures for vented appliances which covers testing of gas or oil forced air systems, boilers, domestic hot water heaters, gas fired ranges and ovens. Additionally, attendees using a combustible gas leak detector will be taught the proper sequence of gas leak detection/evaluation and understand proper CAZ testing for all conditions, as outlined in the BPI standards. All WAP Energy Auditors and

QCIs must achieve the CAZ certification of completion during PY 2021 unless the certification of completion was achieved in PY 2020 or PY2019.

**Health and Safety (formerly IAQ/Mold) Certification of Completion: (Required)**

Health and Safety Certification of Completion will ensure weatherization workers can identify conditions that promote mold growth, health and safety issues (outlined in WPN 17-7), and how to prevent worsening conditions. New weatherization staff is required to achieve certification of completion within 180 days of the date of hire. All required training/certification must be completed within 180 days of the date they are hired.

**Lead Safe Work (LSW) Certificate of Completion: (Required)**

LSW Training is available through MiTEC and can be performed either in-person or online. All required training/certification must be completed within 180 days of the date they are hired. LRRP Certification can substitute this certification of completion.

**Mobile Home Certificate of Completion: (Required)**

Mobile Home Certificate of Completion will ensure individuals have knowledge on issues specific to manufactured housing, how to conduct work diagnostics (proper duct pan testing and duct sealing) and repairs, retrofit a mobile home belly with insulation, insulate sidewalls and roofs. All WAP Energy Auditors, QCIs, Crew Leaders, and Retrofit Installers/Technicians must achieve the Mobile Home certification of completion during PY 2021 unless the certification of completion was achieved in PY 2020.

**SUBGRANTEE/LOCAL REQUIRED CREDENTIALS. EXAMPLES INCLUDE:**

• **CONTRACTOR LICENSING**

Each year as a component of the DOE plan submission and budget process, agencies submit information regarding which contractors are currently working with the agency. Additionally, confirmation is provided that the agency collects and maintains documentation of proper licensing and insurance for these contractors. Through a monitoring process conducted annually, BCAEO monitors review a selection of documentation collected by the agency to confirm up to date licenses including residential builders license, mechanical license, LRRP Firm certification, and insurance.

**Subgrantee Documentation Requirements:**

- Documentation (e.g. copy of certificate) of Environmental Protection Agency (EPA) required Lead Renovator Repair Painting (LRRP) training for crew, staff, and subcontractors
- Documentation (e.g. copy of certificate) of EPA LRRP Firm status as required including expiration date
- Documentation (e.g. copy of certificate) of EPA LRRP Renovator status as required including expiration date
- Documentation of individuals' certification in LSW (if not LRRP certified)
- Documentation of individuals' certification in IAQ
- Documentation of individuals' certification in OSHA 10 hour or 30 hour
- Documentation of all individuals' participation in comprehensive training and their relevant certifications, if applicable.

**INDUSTRY REQUIRED CREDENTIALS. EXAMPLES INCLUDE:**

- **EQUIPMENT/MATERIAL MANUFACTURE CERTIFICATION**
- **VENDOR CERTIFICATION**  
(E.G. EQUIPMENT/MATERIAL MANUFACTURE CERTIFICATION, VENDOR CERTIFICATION)

Each year as a component of the DOE plan submission and budget process, agencies submit information regarding which contractors are currently working with the agency. Additionally, confirmation is provided that the agency collects and maintains documentation of proper licensing and insurance for these contractors. Through a monitoring process conducted annually, BCAEO monitors review a selection of documentation collected by the agency to confirm up to date licenses including residential builders license, mechanical license, LRRP Firm certification, and insurance. Agencies will receive a monitoring report and may be required to updated certification information.

**PROCESS FOR MAINTAINING WORKFORCE CREDENTIALS**

To ensure Subgrantee Technical Weatherization Staff have the qualifications and skills to meet the DOE identified, National Renewable Energy Laboratories (NREL) Job Task Analysis (JTA), for each position in which the weatherization worker is employed, the BCAEO/MiTEC will ensure compliance with Weatherization Program Notice 15-4 (WPN15-4) as clarified by WAP Memorandum 034.

CSPM 618 and 618.1 outline the required workforce credentials required for individuals working in a JTA as an Energy Auditor, QCI, Crew Leader and Retrofit Installer. During the agency plan submission process, agencies provide a roster of active individuals working in the WAP program. Agencies are responsible for collecting documentation on completed training and credentials such as the State of Michigan Energy Auditor Certification, BPI Energy Auditor Certification and BPI Quality Control Certification. Agencies are expected to confirm all required certification is up to date for Energy Auditors and QCIs. Annually, BCAEO Technical Monitors review a selection of documentation collected and provided by the agency to confirm proper credentials.

All Subgrantees are responsible for ensuring that all weatherization workers are familiar with the NREL JTAs for each position and performing work to meet the JTA standards and the Standard Work Specifications in order to ensure quality work on every weatherization project. It is the Subgrantees responsibility to ensure that all untrained staff must not be left without supervision in the field during weatherization.

**HOW CREDENTIALS ARE TRACKED**

During the DOE application process, agencies complete a spreadsheet identifying contracting companies that work with the agency as well as all individuals working in a JTA employed by either those contractor companies or the agency. Agencies are expected to maintain documentation of credentials and provide copies to the State by uploading to SharePoint. MDHHS-BCAEO has a Learning Management System (LMS) to track training provided by MiTEC and are working on an integration plan so all credentials, training, and certifications are maintained in one location.

All training completions, dates, staff, and certifications for the Weatherization Assistance Program (WAP) that have occurred outside of MiTEC are to be entered by each subgrantee into SharePoint within 30 days of completion. For each of these items that happened within MiTEC, the student's record is maintained within the Learning Management System (LMS) and does not need to be submitted in SharePoint. Each Subgrantee is required to inform BCAEO of any agency contractor/staff that achieves any of the Home Energy Professional certifications. Subgrantees can inform BCAEO by emailing the MDHHS-BCAEO@Michigan.gov mailbox and including the Agency name, certified staff/contractor, type of certification, and date of certification.

## 4.0 – TRAINING

GRANTEES HAVE TWO OPTIONS TO DESCRIBE THEIR TRAINING.

- A) USE THE EMBEDDED SPREADSHEET\* TO IDENTIFY AND DESCRIBE THE TRAINING SCHEDULE FOR GRANTEE AND SUBGRANTEE STAFF. INCLUDE TECHNICAL AND NON-TECHNICAL TRAINING.
- B) OR USE THE FIELDS BELOW TO IDENTIFY AND DESCRIBE THE TRAINING SCHEDULE FOR GRANTEE AND SUBGRANTEE STAFF. INCLUDE TECHNICAL AND NON-TECHNICAL TRAINING.

GRANTEES ARE TO INCLUDE THE FOLLOWING IN THEIR DESCRIPTIONS REGARDLESS OF WHAT OPTION IS BEING USED TO DESCRIBE THEIR TRAINING PLAN:

- SPECIFY WHETHER ATTENDANCE IS MANDATORY, AND THE RAMIFICATIONS FOR NON-COMPLIANCE.
- SPECIFY IF THE T&TA PLAN SPANS MULTIPLE PROGRAM YEARS (PY), INDICATE WHICH TRAININGS ARE INTENDED IN THE CURRENT PY AND WHICH ARE PLANNED FOR FUTURE PYs.

\* THE EMBEDDED SPREADSHEET, IF COMPLETED AT THE END OF THE YEAR TO RECORD DELIVERED TRAINING, CAN BE USED AS DOCUMENTATION FOR THE REQUIRED ANNUAL T&TA REPORT. DOUBLE CLICK TO OPEN SPREADSHEET. ENTER INFORMATION AND CLOSE. IT WILL AUTOMATICALLY SAVE YOUR INFORMATION



### TTA Planning and Reporting Template F

#### PROGRAMMATIC/ADMINISTRATION TRAINING

- FINANCIAL (I.E. 2 CFR 200)
- MANAGEMENT (I.E. 10 CFR 440)

Subgrantees are required to administer this grant following the U.S. DOE WAP regulations and guidance. The CSPM will prevail when the manual has policy that contains requirements different from WAP regulations. The subgrantees will determine which weatherization measures will be completed on an eligible dwelling unit in accordance with the Michigan Weatherization Field Guide and the Inspection/Testing/Energy Audit Requirements.

The subgrantees will maintain a basic service system which includes an outreach/intake system, a method of installing measures, audit and inspection procedures, qualified crews and/or subcontractors, and maintenance of quality control procedures to ensure each dwelling weatherized is completed in compliance with all program requirements.

All weatherization work must have an independent Quality Control Inspector (QCI). The QCI is an individual that has no involvement with prior work on the home either as the auditor or as a member of the crew. If the QCI is not agency staff, but working as a contractor, he or she may not be employed by a contractor that has completed work on the home.

Training in key topic areas will be developed and delivered over the next three years. When possible, MDHHS-BCAEO will record classes and make them available online. Training topics are held at conferences and other MDHHS-BCAEO training opportunities. It is expected that all new weatherization managers enroll in the 12-month weatherization manager's training program. It is offered once every three years.

#### **Financial Management Training:**

- Weatherization Financial Training 2 CFR 200
- Ethic, Conflict of Interest, and Background Checks
- Financial Management
- Budgeting and the application process
- Accounting and Internal Controls
- Procurement: consulting and contractor contracts
- Purchasing
- Payroll and Cost allocation
- Travel
- Program Income
- Equipment
- Inventory
- Financial Reports and Performance Analysis

#### **Program Management Training:**

- Weatherization 10 CRF 440
- Legislation, Regulations, WPN, CSPM, and Contract
- Ethics and Conflict of Interest
- Annual Planning
- Recordkeeping
- Monitoring and follow-up
- Quality Control and Standard Work Specifications
- Energy Audits
- Programmatic Management
- Performance Management
- Reporting
- Performance Analysis
- Health and Safety/Optional Measures
- Leveraging
- Training and Required Certifications

Over the past three years, MDHHS-BCAEO held two Weatherization Management 12-month training programs, one for new weatherization managers program and followed with an advanced weatherization manager training program. The decision to train a cohort of weatherization managers was based on a high percentage of new weatherization managers in the program. Above topics will be available over the next three years to ensure continued learning and growth opportunities for weatherization professionals.

**COMPREHENSIVE TECHNICAL TRAINING ALIGNED TO THE JOB TASK ANALYSIS (IDENTIFY AT WHAT INTERVALS WORKERS WILL RECEIVE REGULAR, COMPREHENSIVE TRAINING AS REQUIRED BY WEATHERIZATION PROGRAM NOTICE (WPN) 15-4)**

- QUALITY CONTROL INSPECTOR
- ENERGY AUDITOR
- CREW LEAD
- RETROFIT INSTALLER/TECHNICIAN

Comprehensive Training for Energy Auditor (EA), Quality Control Inspector (QCI), Crew Leader and Retrofit Installer will be required for all WAP workers within their JTA aligned position. MiTEC is responsible for ensuring that Comprehensive Training is provided in accordance with CSPM, Michigan Retrofit Field Guide (aligned with the SWS), WPN 15-4, and WAP Memorandum 034.

MDHHS-BCAEO will develop online training videos for performance improvement that will be available as annual refreshers. Subgrantees will develop an annual training plan for contractors and crews starting in PY22 with new training opportunities at MiTEC.

MiTEC will use the below accredited curriculum to meet the Comprehensive Training Needs of Michigan's WAP Network for PY 2021.

- Energy Auditor
- Quality Control Inspector
- Crew Leader
- NEAT/MHEA Setup and Maintenance
- NEAT/MHEA Data Entry
- Advanced Air Sealing
- Zone Pressure Diagnostics (ZPD)
- Combustion Appliance Zone (CAZ)
- ASHRAE 62.2
- Dense Pack Insulation
- Mobile Home Weatherization
- Foundation Insulation
- Venting and Combustion Air
- Mechanical Systems Inspection for Auditors
- Weatherization 101

**Comprehensive Training Plan for PY 2021**

**Focus Areas:**

- Requirements for all WAP Energy Auditors, QCIs, Crew Leaders and Retrofit Installers/Technicians
  - Combustion Appliance Zone (CAZ)
  - ASHRAE 62.2
  - Mobile Home Weatherization
- Development of Workforce
  - Create, implement, promote, and train Career Tracks for
    - Retrofit Installers
    - Crew Leaders
    - Energy Auditor
    - Quality Control Inspectors
- Development of Performance-Based Training for retrofit installers



**Below are the base offerings for the existing Michigan Weatherization Assistance Program Network:**

Course Offering	Estimated Number of Completed Trainings	JTA Alignment			
		EA	QCI	CL	RI
Energy Auditor	18	X	X		
Quality Control Inspector	15	X	X		
Crew Leader	18	X		X	X
NEAT/MHEA Setup	10	X	X		
NEAT/MHEA Data Entry	10	X	X		
Advanced Air Sealing	24	X		X	X
Zone Pressure Diagnostics	12	X		X	X
Combustion Appliance Zone (CAZ)	18	X	X	X	X
ASHRAE 62.2	18	X	X	X	
Dense Pack Insulation	24	X		X	X
Mobile Home Weatherization	30	X	X	X	X
Mechanical Systems Inspection for Auditors	20	X	X		
Weatherization 101	24	X	X	X	X
Venting & Combustion Air	10	X	X	X	X
Foundation Insulation	20	X		X	X

#### **Course Catalog:**

#### **Crew Leader/Retrofit Installer Training**

This two-day class is intended to provide participants with the required knowledge regarding regulations, methods, processes, and the abilities required for individuals supervising shell projects in the DOE National Weatherization Program. We will cover planning the scope of work, preparation and maintenance of the job site, Implementation of the scope of work, managing the project and finalizing the job. We will also review and discuss the theory and concepts behind building science, the importance of health and safety, and programmatic requirements. Included will be discussions on the relationships between the crew leader and other weatherization professionals and how to put everything covered in this course together to ensure a successful, productive, profitable, and comprehensive job completion.

(BPI CEUs: 3.25)

#### **Learning objectives:**

- Recognize the requirements of persons in the role of weatherization crew leader
- Express leadership skills for effectively managing a crew and problem solving
- Locate and discuss all forms and documents required of a crew leader in the Michigan WAP
- Elaborate on the actions of developing a plan to execute the scope of work
- Indicate what is needed to prepare and maintain a job site
- Identify the processes of implementing the scope of work
- Plan what is required to manage the entire project
- Describe the steps a crew leader takes in finalizing the job

- Define the relationships with other weatherization staff
- Illustrate the role of the crew leader in maintaining quality control
- Associate the importance of safe work practices throughout the project
- Calculate and anticipate the need for controlled ventilation

**Prerequisites:**

- Successful completion of the following comprehensive Installer courses:
  - Advanced Air Sealing
  - Dense Pack Wall Insulation OR
- Currently working as an installer with requisite experience (2 years)

**Requirements for PY21 Comprehensive Training:**

- Mobile Home Training
- Air Sealing
- Dense Pack Insulation
- Crew Leader (not needed for retrofit installer)

**Comprehensive Classes:**

- Crew Leader (not needed for retrofit installer)
- Weatherization 101
- Air Sealing
- Dense Pack Insulation
- Foundation Insulation
- Advanced Mobile Home Weatherization
- Performance-Based Training Module (Retrofit Installer option – new in PY21)

**Certifications:**

- Retrofit Installer
  - Certification of Completion for all Required Classes and Core Classes
  - Performance-Based Competency Module Certifications
- Crew Leader
  - Certification of Completion for all Required Classes and Core Classes

**Regular Training and Updates:**

- New Crew members and Crew Leaders will participate in the comprehensive classes listed above during their first 12 months in the field. Individuals enrolling in the performance-based training will be expected to complete the program within 12 to 18 months.
- MDHHS-BCAEO expects Crew members and Crew Leaders to attend all state required training during the year to ensure updates occur in the field. Updates are provided at the two annual conferences sponsored by MDHHS-BCAEO.
- Retrofit Installers and Crew Leaders must take one comprehensive class listed above every 3 years and all required classes for the program year.

**Energy Auditor Training**

This five-day class is intended to provide participants with the knowledge of the steps involved in the process of becoming an Energy Auditor in the DOE National Weatherization Program. In the classroom, we will discuss theory, concepts, inspection, and the audit process from beginning to end interspersed with classroom activities to reinforce those concepts and inspection procedures. For hands-on, we will perform tasks

associated with performing a complete energy audit. Participants are expected to have a knowledge base in place which will allow a viable transition from knowing to implementation. The goal of this class is to take information learned in other classes and in the field and “put it all together” into a comprehensive audit process. There are recommended prerequisites before taking this class. (BPI CEUs: 8)

**Prerequisites:**

- Successful completion of Weatherization Installer or Crew Leader courses or equivalent OR
- Currently hold a Building Analyst / Energy Auditor certification or have been working as an energy auditor OR
- Have requisite experience in the energy conservation field

**Learning objectives:**

- Recognize the requirements needed to function as an Energy Auditor in the DOE Weatherization Program
- Locate and discuss all forms and documents required as part of the audit process
- Organize class information and previous knowledge base into a comprehensive field audit process
- Demonstrate Auditor skills and inspection processes in the field per Michigan and BPI HEP EA standards
- Formulate a viable work scope for a home
- Validate work scope recommendations

**Requirements for PY21 Comprehensive Training:**

- CAZ Pressure Diagnostics
- ASHRAE 62.2
- Mobile Home Training

**Comprehensive Classes:**

- Energy Auditor
- Mechanical Systems Inspection for Auditors
- NEAT/MHEA Set Up and Maintenance
- NEAT/MHEA Data Entry
- CAZ Pressure Diagnostics
- ASHRAE 62.2
- Venting & Combustion Air
- Zone Pressure Diagnostics (ZPD)

**Certification:**

- State of Michigan Energy Auditor Certification
  - Valid for 18-months
- HEP Energy Auditor Certification
  - New individuals will have an 18-month grace period from the date the SOM Energy Auditor Certification was achieved to obtain HEP Energy Auditor Certification
  - Individuals who currently possess a SOM Energy Auditor Certification (pre PY21) must obtain the HEP Energy Auditor Certification by June 30, 2022
  - HEP Energy Auditor Certifications must be recertified every 3 years

**Regular Training and Updates:**

- New Energy Auditors will participate in the classes and must successfully achieve the State of Michigan Energy Auditor Certificate during their first 18 months in the field.
- MDHHS-BCAEO expects Energy Auditors to attend all state required training during the year to ensure updates occur in the field. Updates are provided at the two annual conferences sponsored by MDHHS-BCAEO.
- Energy Auditors must take one comprehensive class listed above every 3 years and all required classes for the program year.
- Energy Auditors must recertify the HEP Energy Auditor Certification every 3 years.

**Quality Control Inspector Training**

This one-day class is intended to provide individuals guidance toward gaining the BPI Home Energy Professional (HEP) Quality Control Inspector micro-credential within the requirements of the DOE Weatherization Assistance Program. Provided will be knowledge of the necessary steps to gain certification and Identify the role and expectations of a QCI. We will outline techniques for evaluating the work scope completely and accurately from desk top preview to in-progress visits through job completion. We will also discuss measures effectiveness, missed opportunities, additional work and report writing. This course will include a written assessment for final completion. There are recommended prerequisites before taking this class.

**Learning Objectives:**

- Explore the steps to receive a QCI micro-credential through a BPI test center
- Locate policy, regulations, and standards as they apply to a scope of work
- Identify worker compliance with safety regulations
- Indicate protocol of a QCI in-progress evaluation
- Interpret on site documentation accuracy
- Define installed measures and initial assessment details
- Reference standards in relation to installed measures
- Determine if scope of work policy requirements have been satisfied
- Identify techniques and procedures for successful inspections
- Describe desktop, in-progress, monitoring, and reporting methods
- Trace QCI responsibilities related to the work scope from beginning to end
- Evaluate missed opportunities and scope of work omissions

**Prerequisites:**

- Successful completion of Weatherization Energy Auditor course or equivalent
- Currently hold a Building Analyst / Energy Auditor certification or have been working as an energy auditor
- Have requisite experience in the energy conservation field

**Requirements for PY21 Comprehensive Training:**

- CAZ Pressure Diagnostics
- ASHRAE 62.2
- Mobile Home Training

**Comprehensive Class:**

- Quality Control Inspector

- Mechanical Systems Inspection for Auditors
- NEAT/MHEA Set Up and Maintenance
- NEAT/MHEA Data Entry
- CAZ Pressure Diagnostics
- ASHRAE 62.2
- Venting & Combustion Air
- Zone Pressure Diagnostics (ZPD)

**Certification:**

- HEC Quality Control Inspector Certification (BPI) to be recertified every 3 years

**Regular Training and Updates:**

- MDHHS-BCAEO expects Quality Control Inspectors to attend all state required training during the year to ensure updates occur in the field. Updates are provided at the two annual conferences sponsored by MDHHS-BCAEO.
- Quality Control Inspectors must take one comprehensive class listed above every 3 years and all required classes for the program year.
- Quality Control Inspectors must recertify the HEC Quality Control Inspector Certification every 3 years.

### ASHRAE 62.2 Training

ASHRAE Standards 62.2 certification of completion will address ventilation and acceptable indoor air quality in low-rise residential buildings. Energy Auditors and Quality Control Inspectors will be required to achieve an ASHRAE 62.2 certification of completion. Individuals will be able to understand ASHRAE calculations, proper use of calculation forms, and ventilation requirements and techniques to achieve compliance.

**Requirements by Roles:**

- All WAP Energy Auditors and QCIs must achieve the ASHRAE 62.2 certification of completion by the end of PY 2021 unless the certification of completion was achieved in PY 2020 or PY 2019.

**Classes:**

- ASHRAE 62.2 training by MiTEC

**Certification:**

- Certification of Completion

**Regular Training and Updates:**

- All Weatherization Energy Auditors and Quality Control Inspectors are required to attend training by end of PY 2021.

### Combustion Appliance Zone Training

This 1-day class is designed for Auditors and Technicians who are responsible for performing CAZ pressure diagnostics and affecting repairs. We have long been familiar with the term “worst case” draft testing and H&S has always been our first consideration when performing CAZ pressure testing. While H&S is our primary concern, there are also building durability, comfort, IAQ and efficiency issues that we must consider. In this class we will discuss concepts and root causes of pressure issues along with CAZ testing procedures and equipment. From a more complete perspective, participants will then be challenged to interpret diagnostic test results and identify appropriate repairs to help ensure that the building works in all respects. Combustion Appliance Zone (CAZ) certification of completion will ensure the safety of agency staff, weatherization contractors, and occupants. Individuals will understand the Building Performance Institute (BPI) standards for combustion safety test procedures for vented appliances which covers testing of gas or oil forced air systems, boilers, domestic hot water heaters, gas fired ranges and ovens. Additionally, attendees using a combustible gas leak detector will be taught the proper sequence of gas leak detection/evaluation and understand proper CAZ testing for all conditions, as outlined in the BPI standards.

#### Requirements by Roles:

- All WAP Energy Auditors and QCIs must achieve the CAZ certification of completion during PY 2021 unless the certification of completion was achieved in PY 2020 or PY 2019.

#### Class:

- CAZ training by MiTEC

#### Certification:

- Certification of Completion

#### Regular Training and Updates:

- All Weatherization Energy Auditors and Quality Control Inspectors are required to attend training in PY 2021.
- Training is geared for auditors and technicians. Continued training on this topic is necessary until high energy efficiency in weatherization can be achieved.

### Mobile Home Training

Mobile Home Certificate of Completion will ensure individuals have knowledge on issues specific to manufactured housing, how to conduct-work diagnostics and repairs, retrofit a mobile home belly with insulation, insulate sidewalls and roofs, and check heating systems. The training is to ensure that those in the appropriate roles in Michigan’s WAP workforce understand proper duct pan testing and duct sealing.

#### Requirements by Roles:

- All Energy Auditors, QCIs, Crew Leaders or Retrofit Installers/Technicians must achieve the Mobile Home certification of completion during PY 2021 unless the certification of completion was achieved in PY 2020 or PY 2019.

#### Classes:

- Mobile Home training by MiTEC

**Certification:**

- Certification of Completion

**Regular Training and Updates:**

- All Weatherization Energy Auditors, QCIs, Crew Leaders or Retrofit Installers/Technicians are required to attend training in PY 2021.

### Advanced Air Sealing Training

Advanced Air Sealing is a rigorous, one-day course emphasizing the importance of effective air sealing within the Weatherization Assistance Program. Focusing on known techniques and theory we will examine and implement how to detect air sealing opportunities and common leakage sites, determine appropriate tools and materials needed for air sealing, discuss air sealing guidance and best practices, and verify that an effective air barrier has been established. This course is a combination of classroom, lab, and field air.

#### Learning Objectives:

- Describe the function and location of pressure and thermal boundaries
- Summarize the basic concepts, theory, and principles of air leakage
- Identify access to specific air sealing work areas
- Apply protective measures and cleaning practices while working on the home
- Recognize signals of compromised pressure and thermal boundaries
- Characterize common air sealing tools, materials, and material characteristics
- Categorize air sealing opportunities and common leakage sites
- Explain basic blower door functionality to verify an effective air barrier has been established
- Describe treatment options for walk-up attics and other unique air sealing details

#### Certification:

- Certification of Completion

### Air Sealing & Dense Pack Wall Insulation

Proper air sealing and insulation techniques work hand in hand to achieve a high degree of energy efficiency. In this two-day class we will examine proper air sealing techniques by outlining not only the need to perform quality air sealing but what materials to use and where to use them. This course will also examine how to properly dense pack exterior walls with cellulose insulation. This technique combines the best of both worlds in obtaining air sealing and a higher R-value of wall insulation at the same time. Proper machine set-up, probing walls and tubing techniques will be covered so that the maximum R-value in the exterior walls can be obtained. (BPI CEU: 6.5)

#### Learning objectives:

- Gain a deeper understanding of the need for proper air sealing
- Learn proper air sealing techniques as well as materials to use
- Learn proper dense pack wall insulation methods
- Gain an understanding of the rules governing WAP training
- Review Michigan's Change Vision for WAP
- Examine Michigan's goal of advanced Weatherization performance

#### Certification:

- Certification of Completion

### Combustion Appliance Zone Diagnostics Training

This one-day class is designed for Auditors and Technicians who are responsible for performing CAZ pressure diagnostics and affecting repairs. We have long been familiar with the term "worst case" draft testing and H&S has always been our first consideration when performing CAZ pressure testing. While H&S is our primary concern, there are also building durability, comfort, IAQ and efficiency issues that we must consider.



In this class we will discuss concepts and root causes of pressure issues along with CAZ testing procedures and equipment. From a more complete perspective, participants will then be challenged to interpret diagnostic test results and identify appropriate repairs to help ensure that the building works in all respects.

**Learning objectives:**

- Define the concepts behind how structural and mechanical systems interact in residential buildings
- Learn how pressure imbalances caused by these interactions create problems with health & safety, building durability, comfort, and energy efficiency
- Review all Auditor responsibilities regarding CAZ pressure testing and operational testing of appliances under “worst case” conditions
- Explore how review of the CAZ pressure testing results can help drive work scope development and remediation of problems

**Certification:**

- Certification of Completion

### **Dense Pack Insulation**

Dense Pack Insulation is an in depth, one day, course intended to cover the principles and theory behind dense pack sidewall insulation. We will examine proper equipment set up and maintenance along with the necessary tools needed for optimal uniformity, target density, workflow and production. Lastly, we will explore the guidance, best practices, and filling techniques related to dense pack insulation.

**Learning Objectives:**

- Identify access to specific dense pack insulation work areas.
- Apply protective measures and cleaning practices while working on the home.
- Explain the importance of achieving uniform density within the cavity.
- Select necessary dense pack tools, and materials (including safety equipment).
- Identify insulation equipment setup and maintenance protocols.
- Reference dense pack related guidance and techniques.
- Demonstrate dense pack filling techniques.
- Illustrate methods to verify proper density has been achieved.

**Certification:**

- Certification of Completion

### **Foundation Insulation**

Foundation Insulation is an in-depth, one day course that covers techniques and best practices for insulating foundations in the Weatherization Assistance Program. We will cover characteristics of foundations and how best to approach these sometimes-challenging installations. Included will be proper vapor barrier insulation in foundations, air sealing techniques for foundations, duct sealing techniques for foundations, worker safety, standards and acceptable insulation application.

**Learning Objectives:**

- Recognize the importance of air sealing prior to insulation
- Locate and verify access to specific work areas
- Identify guidance and standards for acceptable installations

- Organize equipment, tools, and materials necessary for proper installation
- Demonstrate installation of vapor barrier, insulation, and air sealing measures

**Certification:**

- Certification of Completion

### **Mechanical Systems Inspection for Auditors (MSIA)**

This two-day class is intended to provide an introductory look at mechanical equipment found in Weatherization homes. The purpose is to provide a knowledge base to familiarize Auditors with equipment components and operation. Participants will be exposed to different system types, operational characteristics, sequences of operation, and basic testing procedures. It is intended that students will gain the skills necessary to provide a general visual inspection. This is an introductory class to mechanical systems with a focus on Auditor responsibilities as part of the Weatherization Audit process.

**Learning objectives:**

- Be exposed to components and operational characteristics of residential heating equipment
- Learn design characteristics and sequences of operation
- Review all Auditor responsibilities regarding operational testing of appliances
- Discuss installation concern

**Certification:**

- Certification of Completion

### **NEAT/MHEA Data Entry**

This 1-day class will review the required information needing to be entered into the database for running a measures report on the home. To assist in data entry, we will review and create User Defined Measures, NEAT Insulation Types, some Library Measures pricing, Itemized Costs, Incidental Repairs and Mandatory Measures before engaging in tab-by-tab data entry in the actual audit. Participants should bring a laptop or other appropriate device with Wx Assistant pre-loaded and a copy of your current database.

### **NEAT/MHEA Database Setup and Maintenance**

This 1-day introductory class will help users in the setup and maintenance of their current Wx Assistant database. We will show how to create and link to new databases going forward along with a tab-by-tab review of the necessary information required to populate the database with current information, measures and pricing. We will focus on Setup and Supply Library information and particularly, Fuel Cost Libraries, NEAT Insulation Types, and User Defined Measures. Participants should bring a laptop or other appropriate device with Wx Assistant pre-loaded and a copy of your current database.

## Venting & Combustion Air

For proper and predictable operation, the importance of having a combustion appliance vent system that is “at least” code cannot be understated. This one-day class is intended to provide guidance in navigating the National Fire Protection Association (NFPA-54) vent sizing tables and the rules associated with using them. Discussed will be aspects of visual inspection of vent systems for determination of proper venting material and size along with installation concerns. Chimneys and “orphaned” water heaters will be part of this discussion. Class exercises will test your skills in properly sizing vents and vent connectors for Category 1 combustion appliances.

Having the proper amount of combustion air in the combustion appliance zone (CAZ) is critical to the safe operation and proper venting of combustion appliances. Necessarily, this class will include a review of combustion air requirements and NFPA approved resolutions to address deficiencies. Also discussed will be engineered combustion air devices. Class exercises will test your skills in combustion air calculations.

### Learning Objectives

- Provide a basic visual inspection of existing vent systems
- Follow NFPA 54 guidelines to properly size vents and vent connectors
- Review installation concerns
- Calculate combustion air requirements
- Provide Code directed guidance for resolution of problems

### Certification:

- Certification of Completion

## Weatherization 101

Weatherization 101 is a one-day course that covers principles and theories of building science, as well as basic techniques and strategies used in weatherization. We will be focusing on the house as a system concept and discuss how the measures we install effect the home’s pressure, moisture, temperature, and the overall “Big Picture” as it relates to building science. Further, we will cover the importance of understanding baseload, ventilation, weatherproofing and mechanical measures, as well as preforming

### Learning Objectives:

- Discuss possible interactions of different home elements
- Recognize possible effects of changes made during weatherization
- Locate and recognize thermal and pressure boundaries
- Describe how driving forces effect home performance
- Illustrate the link between air leakage, energy waste and moisture problems
- Explain the principle behind the blower door and other diagnostic tools
- Convey the need for ventilation and the related options and guidelines
- Define need for weatherproofing any created building penetrations
- Identify the importance of combustion safety throughout the work scope
- Outline the impact of baseloads in regard to energy saving potential
- Identify program fenestration repair and replacement perspective

### Certification:

- Certification of Completion

### Zone Pressure Diagnostic Training

This one-day class is intended to provide participants with a better understanding of building operational characteristics and show how zone pressure diagnostics (ZPD) can be a valuable aid in evaluation of a structure. Pressure diagnostics can help in determining primary and secondary air boundary locations, connection of interior to exterior spaces – including garages, target leakage areas for air sealing, pressure imbalances in the building, or even duct leakage. They are also valuable from a Quality Control perspective and can offer validation to workers that progress is being made. This is important because air leakage and what we do about it can have a huge impact on indoor air quality (IAQ) and health and safety (H&S), building durability, comfort, and energy savings. The goal is to show that ZPD testing is easy to do and a valuable addition to your toolbox.

#### Learning objectives:

- Estimate connectivity between interior and exterior zones
- Determine the alignment of pressure and thermal boundaries
- Estimate hole size ratios in primary versus secondary pressure boundaries
- Interpret pressure pan readings for duct sealing opportunities
- Identify main body, duct zone and room pressure imbalances due to air-handler operation
- Interpret zone pressure diagnostic test results
- Use Advanced zone pressure diagnostics for more specific information for leakage sites
- Assess the potential for health and safety, building durability, comfort or efficiency issues

#### Certification:

- Certification of Completion

### SPECIFIC TECHNICAL TRAINING

- TOPICS IDENTIFIED DURING MONITORING VISIT(S)
- ENERGY MODELING
- HEALTH & SAFETY. ALL H&S TOPICS IN WPN 17-7 REQUIRE SOME LEVEL OF TRAINING FOR ALL AFFECTED WORKERS, THE FREQUENCY OF THIS TRAINING IS A GRANTEE DECISION. EXAMPLES INCLUDE:
  - AIR CONDITIONING AND HEATING SYSTEMS
  - ASBESTOS
  - BIOLOGICALS AND UNSANITARY CONDITIONS
  - BUILDING STRUCTURE AND ROOFING
  - CODE COMPLIANCE
  - COMBUSTION GASES
  - ELECTRICAL
  - FORMALDEHYDE, VOLATILE ORGANIC COMPOUNDS (VOCs), FLAMMABLE LIQUIDS, AND OTHER AIR POLLUTANTS
  - FUEL LEAKS
  - GAS RANGE/OVENS
  - HAZARDOUS MATERIALS DISPOSAL
  - INJURY PREVENTION OF OCCUPANTS AND WEATHERIZATION WORKERS
  - LEAD BASED PAINT
  - EPA'S LEAD RENOVATION, REPAIR & PAINTING PROGRAM (RRP) MOLD/MOISTURE
  - PESTS
  - RADON

- SAFETY DEVICES
- VENTILATION AND INDOOR AIR QUALITY
  - AMERICAN SOCIETY OF HEATING REFRIGERATION AND AIR-CONDITIONING ENGINEERS (ASHRAE)
- WINDOW REPAIR, DOOR REPAIR
- WORKER SAFETY
  - OSHA
- ADDITIONAL TOPICS AS DESCRIBED IN HEALTH & SAFETY PLAN
- CLIENT EDUCATION (TRAINING WORKERS TO CONDUCT CLIENT EDUCATION). EXAMPLES INCLUDE:
  - ENERGY SAVINGS STRATEGIES
  - PROGRAM-SPECIFIC INFORMATION. EXAMPLES INCLUDE:
    - WHAT TO EXPECT
    - ADDITIONAL RESOURCES
  - HEALTH & SAFETY ISSUES

#### Focus Areas:

- Specific Training will be developed as needed to enhance the knowledge and improve performance. Many of the specific trainings that will be utilized in Michigan will help to introduce topics at a basic level to help prepare weatherization professionals to attend comprehensive advanced courses.
- Evaluating performance after comprehensive training to determine if other specific training needs could be helpful
  - Requirements for all WAP Energy Auditors and QCIs based on feedback from the Michigan's WAP on-site monitoring from DOE during PY 2019.
    - Combustion Appliance Zone (CAZ)
    - ASHRAE 62.2
    - Mobile Home Weatherization
  - Requirements for Crew Leaders and Retrofit Installers/Technicians
    - Mobile Home Weatherization
- Requirements for Weatherization Assistance Program as a base knowledge
  - Health and Safety Training
  - OSHA 10
  - LSW/LRRP
- Implement transition plan to convert to WA v10 (NEAT/MHEA)
- Customized required training as needed
- MDHHS-BCAEO will require training as necessary based upon DOE monitoring results, MDHHS-BCAEO monitoring results, and feedback provided from WAP stakeholders.
- MDHHS-BCAEO expects all weatherization professionals to attend all state required training during the year to ensure updates occur in the field. Updates are provided at the two annual conferences sponsored by MDHHS-BCAEO.
- All weatherization professionals must demonstrate outcomes from training in the field. Additional training may be required as noted in monitoring reports for weak work practices and lack of outcome achievement.
- See summary of required training for PY21 in the Required Training and Certification chart in Section 2 protocols to ensure nonskilled workers are supervised.

#### Below are the base offerings for the existing Michigan Weatherization Assistance Program Network:

Course Offering	Estimated Number of Completed Trainings
Lead Safe Work (LSW)	8
Health & Safety Training	1
	0
Client Education	4
Energy Auditor: Norms & Best Practices	2

**Course Catalog for Specific Training:****Lead Safe Work (LSW)**

The intent of this 1-day class is to familiarize crews with safeguards that must be taken when dealing with lead in Weatherization. Lead is poisonous and may be present in older homes. Weatherization professionals working on these homes must be aware of the hazards of lead. Use of lead-safe weatherization is critical to protecting the health of workers, clients and their families. 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.

**Learning Objectives:**

- Discuss what lead is and where it can be found
- Describe lead paint hazards
- Summarize compliance requirements of DOE, EPA and OSHA
- Interpret methods of containment
- Indicate lead testing methods

**Requirements by Roles:** Different roles in Weatherization have different requirements and options for LSW or LRRP training and certification.

- Energy Auditors and Quality Control Inspectors  
Individuals in these roles must receive either LSW or LRRP training and must follow EPA rules.
- Mechanical, Electrical and Plumbing Contractors  
Individuals in these roles must follow EPA rules; but there are no training requirements for individuals beyond those listed generally in this section.
- Shell Contractors and Crews  
Individuals in these roles must receive either LSW or LRRP training and must follow EPA rules.

**Class:**

- Lead Safe Work (LSW) online or in person through MiTEC

**Certification:**

- LSW Certification of Completion

**Regular Training and Updates:**

- All required training/certification (by role as noted above) must be completed within 180 days of the date they are hired.

**EPA Lead Renovation, Repair and Painting (LRRP)**

The US Environmental Protection Agency (EPA) produced the Lead Renovation, Repair and Painting Program that requires each job have an EPA Certified Renovator on-site during job set up and completion. Weatherization installation must be overseen by an EPA Certified Renovator. Crews must follow EPA's Lead, Renovation, Repair and Painting Program (LRRP) when working in pre-1978 housing unless testing confirms the work area to be lead free. The certified person is responsible for documenting that all work is done in a lead safe manner. LRRP Certification, in general, covers the following activities that disturbs in pre-1978 housing and child-occupied facilities:

- Remodeling and repair/maintenance
- Electrical work
- Plumbing
- Painting preparation
- Carpentry
- Window replacement

**Requirements by Roles:** Different roles in Weatherization have different requirements for LSW or LRRP training and certification.

- Energy Auditors and Quality Control Inspectors  
Individuals in these roles must receive either LSW or LRRP training and must follow EPA rules.
- Mechanical, Electrical and Plumbing Contractors  
Individuals in these roles must follow EPA rules; but there are no training requirements for individuals beyond those listed generally in this section.
- Shell Contractors and Crews  
Individuals in these roles must receive either LSW or LRRP training and must follow EPA rules.
- Shell contractor companies and agencies that employ crews must hold the EPA firm license in addition to requirements for individuals.

**Class:**

- Lead Renovation, Repair, and Painting (LRRP) by an EPA Certified Renovator

**Certification:**

- Individuals: LRRP Certification
- Contractors/Agencies: EPA firm license

**Regular Training and Updates:**

- All required training/certification (by role as noted above) must be completed within 180 days of the date they are hired.
- Maintain per EPA guidelines.
- 

## Health & Safety Training

The intent of this 1-day training is to provide attendees with weatherization policy regarding mold and moisture; knowledge to recognize the causes of existing mold growth; and the importance of not creating conditions that could promote new mold growth. We will also look at moisture concerns, moisture control measures, the need for healthy indoor air quality, pollutant sources, client education and health effects of mold on occupants. The curriculum for the Health & Safety Training has been aligned with WPN 17-7 and the associated Table of Issues. Weatherization students will receive specialized training in the recognition of conditions that promote mold growth and other Health & Safety issues they may encounter in their weatherization work and how best to prevent creating new mold or worsening conditions.

**Learning Objectives:**

- Discuss weatherization mold policy
- Summarize health concerns of molds
- List conditions that promote mold growth
- Express the role moisture plays mold growth and IAQ.
- Indicate pollutant remediation techniques.
- Associate the impact of occupant behavior on IAQ.
- Recognize possible needs for mechanical ventilation

**Requirements by Roles:**

- Individuals required to attend the Health and Safety Class will not be permitted to inspect, supervise, and/or work on the dwellings to be weatherized unless they are accompanied by or in the presence of staff who have attended the required training.
- Energy Auditors and Quality Control Inspectors  
Individuals in these roles must receive Health & Safety Training.
- Mechanical, Electrical and Plumbing Contractors  
Individuals in these roles are not required to receive Health & Safety Training.
- Shell Contractors and Crews  
Individuals in these roles must receive Health & Safety Training.

**Class:**

- Health and Safety Training Class by MiTEC offers the following topics:
  - Air conditioning and heating systems
  - Asbestos
  - Biologicals and unsanitary conditions
  - Building structure and roofing
  - Code compliance
  - Combustion gases
  - Electrical
  - Formaldehyde, volatile organic compounds (vocs), flammable liquids, and other air pollutants
  - Fuel leaks
  - Gas range/ovens
  - Hazardous materials disposal
  - Injury prevention of occupants and weatherization workers
  - Lead based paint
  - EPA's lead renovation, repair & painting program (rrp) mold/moisture
  - Pests
  - Radon
  - Safety devices
  - Ventilation and indoor air quality
  - American society of heating refrigeration and air-conditioning engineers (ASHRAE)
  - Window repair, door repair
  - Worker safety
  - Osha
  - Additional topics from Michigan's health & safety plan



**Certification:**

- Certification of Completion

**Regular Training and Updates:**

- All required training/certification (by role as noted above) must be completed to work independently in the field.
- All required training/certification (by role as noted above) must be completed within 180 days of the date they are hired.

**OSHA-10 Hour Training**

Occupational Safety and Health Administration 10-hour completion certification will ensure basic work safe environment practices are applied and how to avoid workplace hazards by weatherization workers.

**Requirements by Roles:**

- All Energy Auditors/QC Inspectors and agency crews/contractors who have not attained certification will not be permitted to independently inspect, supervise, and/or work on the homes to be weatherized unless they are accompanied by or in the presence of staff who have attained the required certification.
- Weatherization Agency Crew Leaders are no longer required to take the OSHA 30-hour course

**Classes:**

- 10-hour Occupational Safety and Health training course provided by Occupational Safety and Health Administration qualified instructor.
- OSHA 30-hour course is not required for individuals but can be used as a substitute for the OSHA 10-hour course to meet the requirement.

**Certification:**

- OSHA 10-Hour Certification of Completion

**Regular Training and Updates:**

- All required training/certification (by role as noted above) must be completed to work independently in the field.
- New staff (Energy Auditors/QC Inspectors and agency crews/contractors) are required to attend training within 180 days of the date they are hired.

**Client Education**

Occupants are a vital part of the “House as a System” where energy efficiency is concerned. Client education is a vital component on every home weatherized. Clients be informed on how to make the best use of the new systems and upgrades. They also can learn how personal actions can improve or hinder a building’s comfort and performance. Currently, each local agency develops their own client handouts. A team at the state level will review, compile, update, and create new material for a statewide client education program. The priority for PY21 is to get resources to the subgrantee for implementation into their local program and then provide material and training for how to use the material. Topics of the training with the focus on how to share information with a client is listed below and will be fully available in PY22.

**Class: (Topics for weatherization professionals working with clients conducted by MiTEC)**

- Air Conditioning and heating systems
- Asbestos
- Biologicals and unsanitary conditions
- Building structure and roofing
- Code compliance
- Combustion gases
- Electrical
- Formaldehyde, volatile organic compounds (vocs), flammable liquids, and other air pollutants
- Fuel leaks
- Gas range/ovens
- Hazardous materials disposal
- Injury prevention of occupants and weatherization workers
- Lead based paint
- EPA's lead renovation, repair & painting program (rrp) mold/moisture
- Pests
- Radon
- Safety devices
- Ventilation and indoor air quality (ASHRAE)
- Window repair, door repair
- Worker safety (OSHA)
- Additional topics as described in Michigan's health & safety plan

**Certification:**

- Certification of Completion

**Regular Training and Updates:**

- Available to all Weatherization Professionals will be ready in PY 2022.

**Energy Auditor: Norms & Best Practices**

This class is intended to provide participants with the knowledge of the steps involved in the process of becoming an Energy Auditor that achieves high energy savings in the DOE National Weatherization Program. In the classroom, we will discuss theory, concepts, inspection, and the audit process from beginning to end. Participants are expected to have a knowledge base in place which will allow a viable transition from knowing to implementation. The goal of this class is to take information learned in other classes and in the field and fine tune the approach. There are recommended prerequisites before taking this class.

**Prerequisites:**

- Successful completion of Weatherization Installer or Crew Leader courses or equivalent OR
- Currently hold a Building Analyst / Energy Auditor certification or have been working as an energy auditor OR
- Have requisite experience in the energy conservation field

**Learning objectives:**

- Recognize apply best practices in the role of the Energy Auditor in the DOE Weatherization Program
- Discuss best practices in managing documentation required as part of the audit process
- Learn how to evaluate energy efficiency in multiple jobs
- Formulate a viable work scope for a home
- Validate work scope recommendations

**State of Michigan Energy Auditor Training**

The State of Michigan Energy Auditor certification is offered by MiTEC to ensure energy audits can be completed with knowledgeable individuals until the HEP Energy Auditor Certification can be achieved. MiTEC has several specific training classes that can be helpful for students. In addition, MiTEC can provide custom training as necessary. The SOM Energy Auditor certification demonstrates competency through training and an onsite field exam, and work experience prerequisites. Once certified, an individual will be able to conduct energy audits for 18 months while working towards achieving the HEP Energy Auditor Certification through BPI.

MDHHS-BCAEO will focus on standardizing material, resource book, brochures, literature, videos, forms/checklists, and internet links to help clients understand the importance of maintaining the work done by weatherization crews. A statewide virtual repository will be created for the subgrantees to use in their client education events as well as with each client.

MDHHS-BCAEO will hire 2 Weatherization Coordinators to develop the resource library and media for client education in PY 2021. In addition to the print and digital material, the team will also retrofit mobile trailers and training sites with hands on labs and exhibits for client education training.

Research and the development of client specific material will be completed in PY 2021 that aligns with the health and safety topics in WPN 17-7. Material will also ensure the most up-to-date information is used in the material to provide clients with energy savings tips and strategies, how to maintain weatherization measures, and how to reduce energy costs. The material and media will encourage the client to take action in maintaining their energy efficiency.

The statewide digital library of resources, as well as print copies, will also contain methods and the appropriate time in teaching, informing, and sharing information with the client.

MDHHS-BCAEO will pilot the client education material in PY 2021 during client and contractor outreach events.

**CONFERENCES. EXAMPLES INCLUDE:**

- **ENERGY OUTWEST**
- **BUILDING PERFORMANCE ASSOCIATION**
- **NATIONAL ASSOCIATION FOR STATE AND COMMUNITY SERVICE PROVIDERS**
- **COMMUNITY ACTION PARTNERSHIP**

MDHHS-BCAEO will participate in the following conferences as needed. Currently, Michigan State employees are not able to travel out of state. The pandemic conditions are still present in the state. Virtual learning opportunities are being used in place of face-to-face travel. MDHHS-BCAEO makes sure a staff person attends conferences that DOE will be presenting.

Below are the Conference MDHHS-BCAEO attends and regularly speaks at:

- Energy OutWest
- Building Performance Association
- National Association for State and Community Service Programs
- Community Action Partnership

**OTHER, PLEASE SPECIFY:**

Michigan also holds an annual fall Weatherization Technical Conference.

MDHHS-BCAEO attends board meetings and other influential meetings that keep us engaged in the national program. Staff holds board positions with the following entities:

- Energy OutWest
- NASCSP
- ASHRAE
- ACCA
- NFPA
- National Weatherization Training Center Consortium

## 5.0 – TECHNICAL ASSISTANCE

DESCRIBE THE TECHNICAL ASSISTANCE ACTIVITIES INCLUDED IN THE T&TA BUDGET CATEGORY.

### PROGRAMMATIC/ADMINISTRATION SUPPORT

**Current Data Analysis shows:**

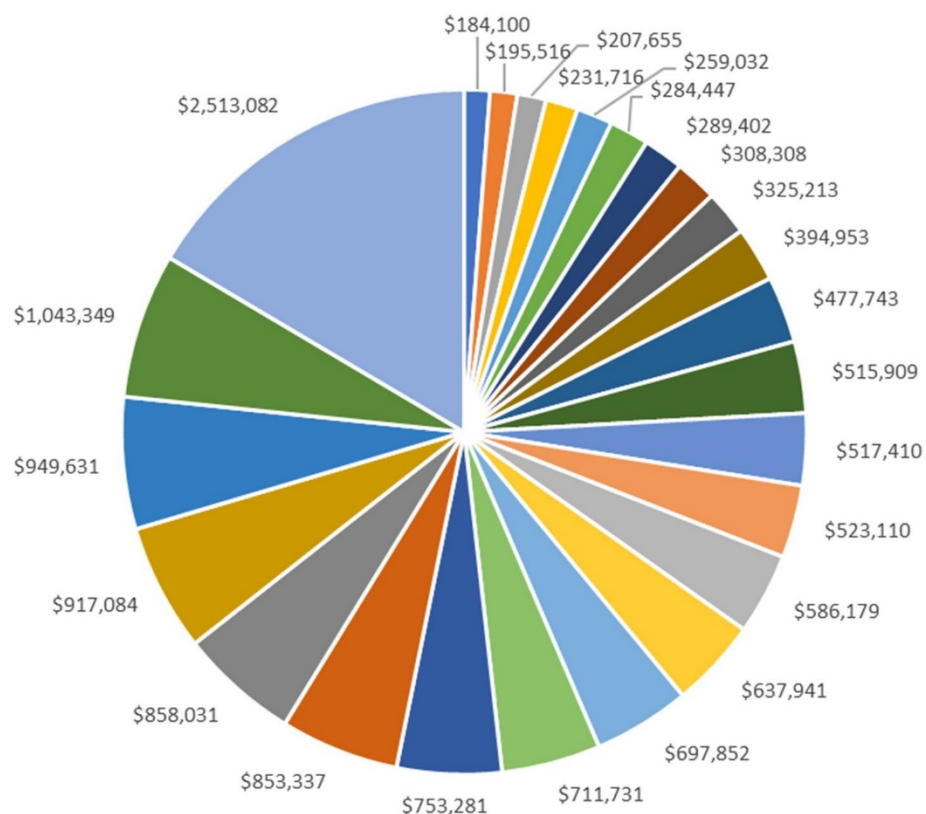
The Michigan Weatherization Program funds 25 Community Action Agencies administering the Weatherization Assistance Program (Below is a summary of the size of the network and a pie chart of new PY 2021 Allocations by each agency)

CAA Funding Category by % of Allocation	#CAAs in Category	Allocation sum of funding (PY21)	Allocation Average in Category
1% Agencies	3	\$587,271	\$195,757
2% Agencies	6	\$1,698,118	\$283,020
3% Agencies	5	\$2,429,125	\$485,825
4% Agencies	2	\$1,224,120	\$612,060
5% Agencies	3	\$2,162,865	\$720,955
6% Agencies	4	\$3,578,083	\$894,521
7% Agencies	1	\$1,043,349	\$1,043,349
16% Agencies	1	\$2,513,082	\$2,513,082

The weatherization network is made up of 60% of small agencies with 35% of the total allocation. The extra-large agency, which is 1 of the 25, is allocated 16% of the funding. This setup is challenging in terms of providing technical assistance. The data shows that small to some medium agencies show signs of instability when one key weatherization staff person or contractor leaves the program. All agencies are experiencing difficulties in expanding their operations. In addition, over the past 3 to 5 years the majority of the weatherization managers at the agencies are new to their role. Approximately, 10 to 12 have 3 to 4 years of experience and about 5 to 7 have 2 to 3 years of experience.

Agency Size	Number of CAAs	Allocation Range	Allocation Total for Group	Allocation Total for Group Percent
Small	15	Under \$600,000 Allocation	\$5,300,692	35%
Medium	9	Between \$600,000 and a low \$1 m)	\$7,422,238	49%
Extra Large	1	Over \$2.5 m	\$2,513,082	16%
	25		\$15,236,012	100%

Michigan Weatherization Network PY21 Allocation by Agency  
July 1, 2021 to June 30, 2022



**Conditions for low production and/or delays include:**

- Weatherization Program Field Suspension in PY2019 and PY2020
- COVID-19 Pandemic
  - Client's fear
  - Contractor and Crew exposure or positive results
- Lack of supplies or prolonged delays in supplies to complete measures
- Low number of contractors interested in working for the weatherization assistance program
  - Contractor demand for work in other fields is very high
  - Too many regulations
  - Difficulties in RFP process
  - Slow payments
- Low number of client applications

Feedback from the WAP network, WAP Quality Assurance Monitoring Reports, and Financial/Programmatic Monitoring Reports assists in the development of the training needs. The information from past monitoring reports, weatherization leadership meetings, surveys, and other sources show that the following technical assistance is needed in the program and administrative management:

- Programmatic Issues that need additional technical assistance
  - Income Eligibility
  - Program Management
  - Statewide Database: FACSPRO
  - Financial Management
    - Procurement
    - Inventory
  - Rebuilding a weatherization program at the local level

**Rebuilding, Reinventing, and/or Revitalization of the local Weatherization Assistance Program Training:**

When a subgrantee needs assistance to rebuild, reinvent, and/or revitalize the local program, MDHHS-BCAEO will provide assistance. In certain situations, when the subgrantee has developed a quality improvement plan to correct performance issues in both their weatherization management and technical portion of the program, MDHHS-BCAEO will provide a weatherization consultant, coach, or instructor for technical assistance as well as a strong training plan.

**TECHNICAL SUPPORT**

Technical Support is conducted in a variety of ways:

- Subgrantees email our main email address with a request for help
- Subgrantees call for assistance
- Subgrantees can make a request specifically to MiTEC for field training. The instructions are found on the MiTEC website
- During quality assurance monitoring and/or programmatic/financial monitoring, MDHHS-BCAEO staff will provide or identify technical assistance

The top items discussed with MDHHS-BCAEO staff is:

- Mobile home measures
- Air Sealing

- Insulation
- Health and Safety issues
- NEAT/MHEA Setup Libraries
- Field Guide Interpretation

#### HEALTH & SAFETY SUPPORT ACTIVITIES

The MDHHS-BCAEO and MiTEC support Health and Safety activities in many ways. The MDHHS-BCAEO Technical monitors are available to assist sub-grantees as questions and uncertain situations arise. Examples of guidance provided by the monitors range from defining friable asbestos, to addressing vermiculite in the attic, to moisture issues, to data entry related to ASHRAE 62.2 calculations, to interpreting policy and regulations. MiTEC staff are available to provide guidance on proper Health and Safety measure installations. MiTEC staff answer questions related to items such as ASHRAE 62.2 installations, LSW methods, vapor barrier installations, adding ventilation, and building tightness to name a few.

#### MONITORING

**WHAT PERCENTAGE OF T&TA FUNDING IS ALLOCATED TO MONITORING? (IF DEFINED IN SECTION B OF THE BUDGET DETAILS WITHIN THE ANNUAL APPLICATION, INCLUDE THAT WITHIN YOUR DESCRIPTION BELOW.)**

#### Training & Technical Assistance Budget Breakdown

Monitoring	\$1,971,182	37%
Training	\$3,400,000	63%
Total	\$5,371,182	100%

#### OTHER, PLEASE SPECIFY

DESCRIBE OTHER TECHNICAL ASSISTANCE ACTIVITIES HERE

## 6.0 CLIENT EDUCATION

**DESCRIBE WHAT CURRENT AND PLANNED CLIENT EDUCATION MATERIALS AND/OR ACTIVITIES ARE INCLUDED IN THE T&TA BUDGET CATEGORY. ONLY THOSE PAID FOR WITH T&TA FUNDS NEED TO BE MENTIONED.**

**NOTE: THIS DOES NOT INCLUDE TRAINING WORKERS TO DELIVER CLIENT EDUCATION. THIS SHOULD BE DESCRIBED IN THE TRAINING SECTION, ABOVE.**

#### CLIENT EDUCATION ACTIVITIES PRIOR TO, DURING AND AFTER WEATHERIZATION WHICH ADDRESS THE WEATHERIZATION PROCESS AND ENERGY SAVINGS DETAILS

Client education is required for all eligible households. Documentation is placed in the client file and the other copy remains with the client for future reference. All Energy Auditors and QCIs are required to complete client education training throughout the Weatherization process. They are to develop skills for client interaction allowing them to explain the changes in the home, post-weatherization.

Client education and participation will help reduce energy costs in a weatherized dwelling.

The goal of the Weatherization Assistance Program is for the weatherization team (weatherization coordinator, intake staff, auditors, inspectors, and crews/contractors) and the client to work together as partners to save energy, to make the home more comfortable, and reduce energy bills.

The weatherization team must be aware of the importance of energy education for the client. Every effort must be made to increase client awareness through multiple contacts during the weatherization process. Staff and contractors must be aware they are the critical link in the partnership goal.

Inclusion of the goal statement on literature, brochures, and forms the client must sign reinforces the partnership goal.

Michigan has developed a small statewide committee to pull resources, ideas, and best practices into a network strategy for consistent client education and increased weatherization knowledge. A statewide campaign is being developed that will include radio broadcast, social media, and regional event for clients and contractors. The goal is to generate more interest in weatherization, increase the number of applications, increase awareness on energy efficiency and conservation efforts, and increase the number of weatherization professionals in the program.

### **Intake**

Energy education begins with intake. This is where the applicant is initially introduced to the weatherization assistance program, the goal statement, the partnership concept, and the applicant is advised of his/her role.

The following minimum steps related to intake must be included in the Grantee's Energy Education Plan.

- Introduce the Weatherization Assistance Program. Explain the concept of the program, what work may be done, and expectations for the applicant's participation.
- Complete the application in FACSPRO or the paper Application for Weatherization Assistance, DHS-4283. Retain the signed WAP application or signed FACSPRO client intake report with the Weatherization disclaimer in the client file.
- Determine eligibility and prioritize the applicant. See Item 611 regarding the client priority system.
- Notify the applicant of the eligibility determination.
- Ask the applicant to prepare for the audit by:
  - Making a list of energy questions and concerns
  - Making the attic, basement, and crawl space accessible
  - Making the perimeter accessible
  - Securing pets
  - Planning to be home and ready to participate

### **Audit**

It is important that the client be involved in the audit process. Client involvement is encouraged through commitment in writing to the goal statement and a minimum of three energy action steps. These energy action steps are to be placed in the client file and to be included with all documentation given to anyone who goes to the client's home.

The following minimum steps related to the audit process must be included in the Grantee's Energy Education Plan.

- Explain the Weatherization Assistance Program, stressing what each partner will do during each step.
- Explain the agenda of the audit and what the client will need to do.



- Explain how the house loses heat. Inquire about the heating system. Talk with the client about whether some rooms seem warmer while others are cooler. Show the client how to adjust heat flow to different areas to save energy and provide more comfort. Point out areas where the client could take action to save energy and money.
- Complete the audit.
- Summarize the results of the audit for the client.
- Explain the nature of the work that may be done on the home.  
If the client is actively participating, agree on three energy action steps for the client to do.  
If the client is actively participating, the Client Plan of Action should be signed by the client and auditor.  
A copy is to be provided to the client and the original must be uploaded to the FACSPRO Weatherization Module under the Weatherization Application Documents tab.

### **Weatherization Work**

When the crew or contractor is at the client's home, he/she should take advantage of every opportunity to reinforce the client's Energy Action Plan (E.A.P.). The theme of partnership and the goal statement need to be a part of the crew or contractor's interaction with the client for continued success.

The following minimum steps must be included in the Grantee's Energy Education Plan.  
Introduce the contractor or crew to the client.

- Complete a quick survey of the home, accompanied by the client. Reinforce the energy conservation work already done by the client.
- Discuss the work plan for the day and proposed work for the client. Reinforce the three energy action steps to which the client committed.
- Complete the work. Summarize the day's work for the client.
- Explain the next step- inspection.

### **Inspection**

Reinforce the partnership between the Grantee and the client. Stress the importance of both the weatherization work and the client's action steps and explain that a breakdown of either could result in less than adequate comfort and savings to the client.

The following minimum steps must be included in the Grantee's Energy Education Plan:

- Ask the client about the weatherization work.
- If appropriate, ask about the client's three energy action steps.
- Inspect the work.
- Follow up on referrals.
- If follow up is provided, explain the next step.

The Grantee may wish to develop a Client Education Package to include the following items:

- A generic letter introducing the Weatherization Assistance Program. See page 5.
- An illustrated step-by-step energy savings guide. This could be distributed with the letter of introduction.
- The client plan of action (required to be retained in the client file) and examples of energy action steps and the potential savings. See page 6 and 7.
- A list of weatherization measures, which includes information relative to the contractor, if applicable. See page 9.
- A generic letter to be provided to the client after the weatherization measures are completed. See page 10.
- An illustrated guide for maintaining the weatherization measures installed.
- A follow up survey.

#### CLIENT EDUCATION ACTIVITIES REGARDING H&S ISSUES AS INDICATED IN WPN 17-7

- AIR CONDITIONING AND HEATING SYSTEMS
  - ASBESTOS
  - BIOLOGICALS AND UNSANITARY CONDITIONS
  - BUILDING STRUCTURE AND ROOFING
  - CODE COMPLIANCE
  - COMBUSTION GASES
  - ELECTRICAL
  - FORMALDEHYDE, VOLATILE ORGANIC COMPOUNDS (VOCs), FLAMMABLE LIQUIDS, AND OTHER AIR POLLUTANTS
  - FUEL LEAKS
  - GAS RANGE/OVENS
  - HAZARDOUS MATERIALS DISPOSAL
  - INJURY PREVENTION OF OCCUPANTS AND WEATHERIZATION WORKERS
  - LEAD BASED PAINT
  - EPA'S LEAD RENOVATION, REPAIR & PAINTING PROGRAM (RRP) MOLD/MOISTURE
  - PESTS
  - RADON
  - SAFETY DEVICES
  - VENTILATION AND INDOOR AIR QUALITY
    - AMERICAN SOCIETY OF HEATING REFRIGERATION AND AIR-CONDITIONING ENGINEERS (ASHRAE)
  - WINDOW REPAIR, DOOR REPAIR
  - WORKER SAFETY
    - OSHA
- ADDITIONAL TOPICS AS DESCRIBED IN HEALTH & SAFETY PLAN

Currently, each local agency develops their own client handouts. MDHHS-BCAEO will focus on standardizing material, resource book, brochures, literature, videos, forms/checklists, and internet links to help clients understand the importance of maintaining the work done by weatherization crews. A statewide virtual repository will be created for the subgrantees to use in their client education events as well as with each client.

MDHHS-BCAEO will hire 2 Weatherization Coordinators to develop the resource library and media for client education in PY 2021. In addition to the print and digital material, the team will also retrofit mobile trailers and training sites with hands on labs and exhibits for client education training.

Research and the development of client specific material will be completed in PY 2021 that aligns with the health and safety topics in WPN 17-7. Material will also ensure the most up-to-date information is used in the material to provide clients with energy savings tips and strategies, how to maintain weatherization measures, and how to reduce energy costs. The material and media will encourage the client to take action in maintaining their energy efficiency.

The statewide digital library of resources, as well as print copies, will also contain methods and the appropriate time in teaching, informing, and sharing information with the client.

MDHHS-BCAEO will pilot the client education material in PY 2021 during client and contractor outreach events.

## Attachment to 619 – Michigan SHPO WAP Exemption Guide

This Guidance is provided by the Michigan SHPO to aid weatherization professionals in their consultation with our office. This Guidance is based on an Interagency Agreement developed between the SHPO, Michigan State Housing Development Authority, the Department of Energy, Labor and Economic Growth, and the Department of Human Services.

Consultation with the SHPO is **not required** for structures that are less than fifty years of age because these are unlikely to be considered historic properties (based on the criteria of the *National Register of Historic Places*).

If the SHPO determines that a property is not listed in or eligible for listing in the *National Register of Historic Places*, even if it is fifty years old or older, then the following exemptions do not apply and no further SHPO review is required.

**The following work items are exempted from SHPO review. These exemptions assume the work is being done on a historic property. Work on historic properties must be done in accordance with the Secretary of the Interior's (SOI) *Standards for the Treatment of Historic Properties*, applicable *SOI Guidelines*, and *Preservation Briefs*. The *Standards* are reflected in the work specifications. All work must be done in accordance with any applicable specifications or it is not exempted. Work items not included in this Guidance are not exempted from SHPO review. Please review the final section of this Guidance for activities that do require SHPO review, including special consideration for potential archaeological impacts.**

### **General Exemptions:**

Energy Audits and Feasibility Studies

Weatherization of mobile homes and trailers

Appliance replacement

### **Exempted Exterior Work:**

Repairing or replacing in-kind existing driveways, parking areas, walkways, etc.

Excavating to gain access to existing underground utilities to repair or replace them.

Minor excavating (2-3 cubic feet) to rebuild or install new crawl space access.

### Air Sealing

- Caulking/weatherstripping around doors/windows for infiltration/exfiltration issues.

### Doors and Windows

- Replacement of existing windows and doors that are not original to the building.
- Replacement of existing original windows and doors when the replacement window or door matches the size, design, proportion, profile and materials of the original and the size of the window or door opening is not altered (enlarged or reduced). Typical vinyl windows with snap-in grids or a grid between glass panes are not appropriate.
- Installing insulated exterior replacement doors where the openings are not altered and they cannot be viewed from the public right-of-way.
- Installation of storm windows or doors and wood screen doors in a manner that does not harm or obscure original historic windows, doors or trim.

### Wall Insulation (no spray foam insulation), subject to the following specifications:

- Minor necessary repairs to prepare exterior walls for insulation are exempted provided the repairs match the original surface composite.
- All wall insulation must have an **adequate vapor barrier or vapor retardant** on the warm (heated) side of the wall **or** consist of a **pre-expanded, closed-cell foam** insulation. Multiple coats of interior wall and ceiling paint are sufficient to meet the criteria of a vapor retardant, per the U.S. Dept. of Energy. More information is available at:

[http://www.energysavers.gov/your\\_home/insulation\\_airsealing/index.cfm/mytopic=11810](http://www.energysavers.gov/your_home/insulation_airsealing/index.cfm/mytopic=11810)

- No holes are drilled through original exterior (wood, brick, etc.) siding, or holes have no permanent visible alteration to the finish materials. Any holes drilled for insulation must be finished and returned to condition as close to the original as possible. Access holes in the walls must be patched or plugged with materials that **match the original** (no plastic plugs).
- Access holes may be patched or plugged with plastic plugs where the original siding was replaced with aluminum or vinyl siding prior to the WAP project.

### Painting and Siding

- Painting over previously painted exterior surfaces, provided destructive surface preparation treatments, including, but not limited to, water-blasting, sandblasting and chemical removal, are not used.

- Installation or replacement of gutters and downspouts, provided that their color is historically appropriate for the period and style of the property.
- Repair or replacement of original exterior siding provided that new siding matches the original siding in dimension, profile, texture, and material (for example, replacement in-kind).
- Replacement of existing aluminum or vinyl siding.

#### Roofing

- Flat or shallow pitch roof replacement (shallow pitch is defined as a pitch with a rise-to-run ratio equal to or less than 3" to 12"), with no part of the surface of the roof visible from the ground.
- Repairing or replacing roofing materials that closely match the historic materials and form, or with materials that restore the original feature based on historic evidence, and in a manner that does not alter the roofline.

#### Solar

- Small Solar Systems, when they are shingle style and on the rear roof of the structure, not viewable from any public right of way.

#### **Interior Work:**

Water Conservation Measures (low flow faucets, toilets, shower heads, urinals)

#### Air Sealing and Insulation

- Sealing air leaks using weather stripping, door sweeps, and caulk and sealing major air leaks associated with bypasses, ducts, air conditioning units, etc.
- Insulation on water heater tanks, pipes and ducts
- Insulation of floors, ceilings, attics, crawl spaces and foundations in a manner that does not harm or damage historic fabric (no spray foam insulation) including:

Band joist ("Sill Box") insulation

Floor insulation, provided that historic floor finishes are not damaged

Attic insulation, including knee-wall insulation, where insulation has been installed previously and when proper ventilation exists

Repair of minor roof leaks prior to installing attic insulation

Attic insulation when no prior insulation has been installed, if there is an **adequate vapor barrier or vapor retardant** on the warm (heated) side of the attic floor, such as fiberglass bat. Multiple coats of interior wall and ceiling paint are sufficient to meet the criteria of a vapor retardant, per the U.S. Dept. of Energy. More information is available at:

[http://www.energysavers.gov/your\\_home/insulation\\_airsealing/index.cfm/mytopic=11810](http://www.energysavers.gov/your_home/insulation_airsealing/index.cfm/mytopic=11810)

- Wall insulation (no spray foam insulation), subject to the following specifications:

Minor necessary repairs to prepare walls for insulation are exempted provided the repairs match the original surface composite.

All wall insulation must have an **adequate vapor barrier or vapor retardant** on the warm (heated) side of the wall **or** consist of a **pre-expanded, closed-cell foam** insulation. Multiple coats of interior wall and ceiling paint are sufficient to meet the criteria of a vapor retardant, per the U.S. Dept. of Energy. More information is available at:

[http://www.energysavers.gov/your\\_home/insulation\\_airsealing/index.cfm/mytopic=11810](http://www.energysavers.gov/your_home/insulation_airsealing/index.cfm/mytopic=11810)

Interior holes drilled for insulation must be finished and returned to condition as close to the original as possible. Access holes in the walls must be patched or plugged with materials that **match the original**. No decorative plaster may be damaged.

#### Fire, Smoke or Carbon Dioxide Detectors / Alarms

- Replacement of existing smoke detector or carbon monoxide detector
- Plug-in carbon monoxide detectors
- New installation of hard-wired devices (occupancy sensors, carbon monoxide sensors, programmable thermostats, smoke detectors) as long as it does not include significant spaces (entrances/entry halls/lobbies, areas for public gathering and circulation, primary rooms). If work occurs in a significant space, work shall not damage historic materials or finishes. New wiring/piping/ductwork, etc. shall be concealed.

#### HVAC Work

- Clean, tune or repair heating and cooling systems, including furnaces, boilers, heat pumps, vented space heaters, wood stoves, central air conditioners, window air conditioners, heat pumps, and evaporative coolers
- HVAC upgrades (Replacement of boilers, furnaces, etc.) that do not require any new venting or a new location, or venting is on the rear of the structure, not visible from any public right of way.

- Install mechanical ventilation, in a manner not visible from the public right of way, to ensure adequate indoor air quality if house is air-sealed to building tightness limit
- Repair or replace vent systems on fossil-fuel-fired heating systems and water heaters to ensure that combustion gasses draft safely to outside if venting is on the rear of the structure, not visible from any public right of way.
- Modify, repair, or replace duct and pipe systems so heating and cooling systems operate efficiently and effectively, including adding return ducts, replace diffusers and registers, replace air filters, install thermostatic radiator controls on steam and hot water heating systems provided:
- The work does not include significant spaces (entrances/entry halls/lobbies, areas for public gathering and circulation, primary rooms). If work occurs in a significant space, work shall not damage historic materials or finishes. New wiring/piping/ductwork, etc. shall be concealed.
- Install programmable thermostats, outdoor reset controls, UL listed energy management systems or building automation systems and other HVAC control systems provided:
- The work does not include significant spaces (entrances/entry halls/lobbies, areas for public gathering and circulation, primary rooms). If work occurs in a significant space, work shall not damage historic materials or finishes. New wiring/piping/ductwork, etc. shall be concealed.
- Ventilating crawl spaces.
- Installing continuous ridge vents covered with ridge shingles or boards, or roof vents, bath and kitchen vents, soffit and frieze board vents, combustion appliance flues, if not located on a primary roof elevation or visible from the public right-of-way.
- Installing foundation vents, if painted or finished to match the existing foundation material.

#### Lighting and Appliances

- Compact fluorescent light bulbs
- Energy efficient light fixtures (replacement)
- Upgrade exterior lighting (replacement of mercury vapor to metal halide bulbs)
- LED light fixtures & exit signs (replacement)



- New installation of hard-wired devices as long as it does not include significant spaces (entrances/entry halls/lobbies, areas for public gathering and circulation, primary rooms). If work occurs in a significant space, work shall not damage historic materials or finishes. New wiring/piping/ductwork, etc. shall be concealed.

#### Plumbing and Electrical Work

- Repairing or upgrading electrical or plumbing systems and installing mechanical equipment, in a manner that does not affect the interior or exterior of the building.
- Repair or replace water heaters that do not require any new venting or a new location, or venting is on the rear of the structure, not viewable from any public right of way.
- New installation of hard-wired devices as long as it does not include significant spaces (entrances/entry halls/lobbies, areas for public gathering and circulation, primary rooms). If work occurs in a significant space, work shall not damage historic materials or finishes. New wiring/piping/ductwork, etc. shall be concealed.

#### **SHPO CONSULTATION REQUIRED**

The work listed in the above exemption Guidance will require SHPO review if it does not meet the described conditions, as will any work item *not included* in this Consultation List. The following activities may affect historic properties (36 CFR Part 800.5) and will require SHPO Section 106 review if they affect a structure that is fifty (50) years of age or older:

- Any activity that does not meet the work specifications of this exemption Guidance and follow the Secretary of the Interior's *Standards for Rehabilitation*.
- Any activity that is not specified in this exemption Guidance
- White Roofs, Cool Roofs, Green Roofs, Sod or Grass Roofs
- Small solar systems; combined solar/wind demonstration units on government buildings
- Lead-based paint abatement
- Power washing
- Repairing masonry, including repointing and rebuilding chimneys
- Insulating with any Spray Foam Insulation Products

**Ground disturbing activity will always require SHPO consultation for archaeological impacts, regardless of the age of structures on the property.**

### **Ground Disturbing Activity**

#### Geothermal Heating Systems

Small-scale concrete slab work, such as placing a slab for a garage or for an addition to an existing building.

Small-scale new construction in urban and residential settings. Examples of small-scale construction would be a detached garage or a shed.

#### New construction

Any ground disturbing activity in the cities of Saginaw, St. Ignace, Bay City, Mackinaw City and Sault Ste. Marie.

### **TERMS OF USE**

Any work item in the WAP program that is not addressed in this list shall be subject to SHPO consultation. This Guidance only applies to projects funded through the WAP program as part of the DOE's Energy Efficiency and Renewable Energy Program (EERE), part of the American Recovery and Reinvestment Act (ARRA) and set to expire in 2012. The terms of this Guidance shall then terminate unless otherwise agreed to by the SHPO. This Guidance is for the exclusive use of the WAP program and shall not apply to any other federally-funded program. The DHS and its delegated entities are advised to document all points of their decision-making in order to demonstrate proper compliance with Section 106.

# Performance Based Module Passport for Michigan Retrofit Installer

Agency: \_\_\_\_\_

Candidate: \_\_\_\_\_

Certified Mentor: \_\_\_\_\_

## 1. Air Sealing At the Lid (Site-built)

### 1.1 General Air Sealing:

- ☐ Existing insulation was removed as needed to access air sealing locations
- ☐ Wall top blocking was installed where necessary

The following are sealed to prevent air movement with the appropriate materials:

- ☐ Top Plates of all Walls
- ☐ Tongue + Groove Ceilings
- ☐ Chases
- ☐ Dropped Soffits
- ☐ IC-rated Can Lights
- ☐ Plumbing Vent Pipes
- ☐ Electrical Penetrations
- ☐ Exhaust Fans
- ☐ Dropped Ceilings
- ☐ Stairwells
- ☐ Chimney/Flue
- ☐ Ductwork Penetrations into Attic
- ☐ Any other holes/penetrations in the attic plane/boundary

Notes:

Job Identifier #	Date	Installer	Certified Mentor

1.2 Combustion Vents/Chimneys/Flues:

- ☐ Worker can identify difference between high-temp flues and other vents (e.g., bath ventilation)
- ☐ Chases around high-temp flues are air sealed with approved materials

A durable fixed dam of approved materials is constructed around high-temp flues that:

- ☐ Allows minimum 3” clearance.
- ☐ Stands at least 2” taller than final insulation levels.

Notes:

Job Identifier #	Date	Installer	Certified Mentor

**1.3 Non-Insulation Contact (IC) Recessed Lights:**

- ☐ Where non-IC recessed lights will be left in place enclosures surrounds each fixture
- ☐ Enclosures Are constructed of fire-rated materials (e.g., 5/8" gypsum wallboard)
- ☐ 3" clearance maintained between fixture, (including wiring, box and ballast), and insulation
- ☐ Enclosures Are free of insulation on top
- ☐ All edges, gaps, and cracks of enclosure, and between enclosure and floor, are sealed

Notes:

Job Identifier #	Date	Installer	Certified Mentor

## 1.4 Treat Attic Hatch:

- ☐ Rigid durable attic hatch blocking/dam is installed in a permanent way
- ☐ Dam will remain 2" taller than final attic insulation depth
- ☐ Hatch is insulated to proper R-value (insulation level of surrounding attic) and durably attached to hatch
- ☐ Access is weather-stripped or otherwise treated to prevent air movement when hatch is closed
- ☐ Access closes with a "friction fit" or latch
- ☐ Trim is air sealed with appropriate material
- ☐ Air tightness of hatch when closed has been verified with blower door and smoke or Infrared camera

Notes:

Job Identifier #	Date	Installer	Certified Mentor

## 2. Air Seal and Insulate Knee Walls

### 2.1 Knee Wall Air Sealing (check prior to insulation):

- ☐ Existing insulation was removed or adjusted to allow access to top and/or bottom of knee wall
  - Blocking or other durable material installed:
    - ☐ Beneath the knee wall (floor running under knee wall)
    - ☐ Above the knee wall (ceiling cavity/slope/roof rafter)
- ☐ Installed blocking beneath knee wall stops air flow and support insulation
- ☐ All joints, cracks and penetrations including connection between interior surface and framing sealed

Notes:

Job Identifier #	Date	Installer	Certified Mentor



2.2 Knee Wall Insulation:

- ☐ Fabric or rigid backing material installed to enclose knee wall cavity in a durable, permanent way
- ☐ Insulation installed to manufacturers' specifications/proper density
- ☐ Insulation has no gaps, voids, compression, or misalignment
- ☐ Holes in backing material sealed as needed
- ☐ Applicable sections of insulation certificate are filled out with coverage area, thickness, R-value

Notes:

Job Identifier#	Date	Installer	Certified Mentor

### 3. Install Dense-pack Sidewall Insulation

**General:**

- ☐ Drill patterns reflect knowledge of framing
- ☐ Installer probed to ensure all cavities were accessed
- ☐ Insulation machine air and material flow setting are appropriate
- ☐ All cavities are filled to proper density (Verify before holes are plugged or with blower door and smoke)
- ☐ Drill holes are patched as required by standards
- ☐ Insulation certificate is filled out with coverage area, thickness, R-value
- ☐ Job site cleaned

**Exterior:**

- ☐ Proper job site protection measures installed or used (e.g., covering shrubs)
- ☐ Siding removed as needed to prevent damage
- ☐ Siding reinstalled in a workmanlike manner

**Interior:**

- ☐ Proper dust control measures installed or used (e.g., drill shrouds, vertical containment)

**Notes:**

Job Identifier #	Date	Installer	Certified Mentor

## 4. Air Seal and Insulate Walls of Conditioned Subspace

### (Basement or crawl space)

#### 4.1 Subspace Air Sealing:

- ☐ Rim joist, sill plate and adjacent surfaces and any walls to be treated were sufficiently cleaned and free of debris to allow for the proper adhesion of any caulks, adhesives, or spray foam
- ☐ All penetrations greater than ¼" filled with steel wool or other pest-proof material before air sealing
- ☐ Air sealing forms a continuous air barrier on the warm side of the thermal boundary, including floor-to-wall and wall-to-ceiling connections

Notes:

Job Identifier #	Date	Installer	Certified Mentor

## 4.2 Subspace Insulation:

On Walls (basements or crawlspaces):

- ☐ Insulation is attached with a durable fastener equal to or better than manufacturer specifications

On Rim Joists:

- ☐ Foam based or vinyl-faced fiberglass batt insulation installed tightly and sealed at all edges
- ☐ Fire rated material is used as needed
- ☐ Insulation has no gaps, voids, compression, or misalignment
- ☐ Insulation certificate filled out

Notes:

Job Identifier #	Date	Installer	Certified Mentor

## 5. Mechanical Ventilation Ducting

(Includes clothes dryer and distribution systems)

### 5.1 Vent Clothes Dryer to the Exterior:

- ☐ Duct material is rigid metal venting material
- ☐ Duct run is as short and straight as practical
- ☐ Duct run is supported as needed to prevent bending or sagging
- ☐ Support materials do not cause the interior dimensions of the ductwork to be less than specified
- ☐ Dryer is ducted to exterior (This does NOT include unconditioned attics, crawlspaces)

#### **Duct transitions:**

- ☐ UL listed foil type duct or semi-rigid metal to rigid metal
- ☐ Other specialized duct fittings are fastened in accordance with manufacturer specifications
- ☐ Duct connectors or other fasteners will not obstruct exhaust flow
- ☐ Where they run through unconditioned space, ducts are insulated
- ☐ Termination fitting is appropriate for dryer and includes a backdraft damper
- ☐ Termination fitting **DOES NOT** include grille/cage/screen (IRC 1502.3)

Notes:

Job Identifier #	Date	Installer	Certified Mentor

## 5.2 Install Ducting for a Bath or Kitchen Range Fan:

- ☐ Duct run is as short, straight, and smooth as possible
- ☐ Ducts are at least as large as the connections they're attached to
- ☐ Ducts are supported as needed to prevent bending and sagging
- ☐ Flex and duct board ducts and plenums are supported every 4' using a minimum of 1 ½" material
- ☐ Metal ducts are supported by 1/2" or wider 18-gauge strapping or 12 gauge or thicker galvanized wire no more than 10' apart
- ☐ Support materials do not cause the interior dimensions of the ductwork to be less than specified
- ☐ All connections are sealed and fastened
- ☐ In addition to mechanical fasteners, duct connections are sealed with UL 181B or 181B-M listed material
- ☐ Fan is ducted to exterior (This does NOT include unconditioned attics, crawlspaces)
- ☐ Duct connectors or other fasteners will not obstruct exhaust flow
- ☐ Where they run through unconditioned space, ducts are insulated to at least R8

Exterior termination is located:

- ☐ At least 3' away from property lines
- ☐ At least 3' away from operable openings in the home
- ☐ At least 10' away from mechanical intake
- ☐ Otherwise sited as required by authority having jurisdiction

Notes:

Job Identifier #	Date	Installer	Certified Mentor

### 5.3 Insulate Ducted Distribution System:

- ☐ Duct insulation has an attached and continuous vapor barrier
- ☐ Duct insulation is mechanically fastened and sealed with no exposed ducts
- ☐ All insulation seams are sealed
- ☐ Ducts are adequately supported
- ☐ Support materials do not cause the interior dimensions of the ductwork to be less than specified

#### **Metal Ducts:**

- ☐ Insulation is securely attached to the ducts with metal wire or rot proof nylon twine
- ☐ Pattern of wire or twine is sufficient to securely hold the duct insulation tight to the duct
- ☐ Duct insulation vapor barrier seams are sealed with manufacturer approved tape
- ☐ Duct insulation is minimum R-8

#### **Flex Ducts:**

- ☐ All metal fittings including boots, elbows, and take-offs are insulated separately using a duct wrap of the minimum acceptable R value with vapor retarder
- ☐ Insulation on metal fittings, boots, elbows, and take-offs is mechanically fastened (e.g., stitch staples, tie bands) and sealed with no exposed metal
- ☐ Any replacement flex duct is sized accordingly
- ☐ Interior liner of flex-to-metal connections are fastened with tie bands using tie band tensioning tool
- ☐ Interior liner of flex-to-metal connections are sealed with UL 181 B-M listed mastic
- ☐ The exterior liner of the flex duct is fastened with tie bands using a tie band tensioning tool

Notes:

Job Identifier #	Date	Installer	Certified Mentor

6. Install Window or Exterior Door, Weather Strip and Sweep Door, Replace Glass

6.1 Window or Door Installation:

- ☐ Window or door installed to meet all local building and safety codes
- ☐ Window or door is fully operational
- ☐ Installation prevents water and air infiltration (Verify with blower door and smoke)

Notes:

Job Identifier #	Date	Installer	Certified Mentor



6.2 Weather Stripping and Sweeps on Exterior Door:

- ☐ Weather stripping and door sweep installed in a durable manner
- ☐ Weather stripping and door sweep prevent air infiltration when the door is closed (Verify with blower door and smoke)
- ☐ Weather stripping and door sweep do not impede door operation
- ☐ Door adjusted as required to properly fit the jamb and allow for ease of operation

Notes:

Job Identifier #	Date	Installer	Certified Mentor

### 6.3 Repair/Replace Cracked or Broken Glass:

- ☐ In pre-1978 windows, presence of lead is assumed unless testing proved otherwise
- ☐ Replacement glass is sized correctly for the opening
- ☐ Replacement glass selected matches original in color and look
- ☐ Replacement glass meets local code requirements (e.g., tempered glass, safety glass)
- ☐ Glass is durably fastened to frame (stops or push points)
- ☐ Opening was cleaned adequately to allow adhesion of sealant
- ☐ Glass is sealed according to design (e.g., glazing, glazing tape or other) to prevent air movement

Notes:

Job Identifier #	Date	Installer	Certified Mentor

## 7. Install or Repair Vapor Retarder in a Subspace

- ☐ Appropriate material (minimum 6 mil thickness) used
- ☐ Coverage is 100% (or as close as is reasonably possible)
- ☐ Vapor retarder extends at least 6" up walls, columns and footings
- ☐ Physical attachments are used where practical and necessary for long term adhesion to vertical surfaces
- ☐ All seams overlap at least 12" using a reverse or upslope lapping technique
- ☐ For wall to floor connection, the wall vapor retarder is installed under the ground moisture barrier
- ☐ Material is fastened to ground as needed to prevent movement as needed
- ☐ Seams and penetrations are sealed with durable sealant compatible with the vapor retarder (unvented)
- ☐ Vapor retarder does not interfere with established drainage patterns

Notes:

Job Identifier #	Date	Installer	Certified Mentor

## 8. Baseload Measures (as applicable)

### 8.1 Insulate a Water Heater Tank and The First 6 Feet of Pipes:

☐ Water heater storage tank is insulated to achieve overall tank R-24

Added insulation does not obstruct the unit's:

☐ Draft diverter

☐ Pressure relief valve

☐ Thermostats or other controls

☐ Access plates

☐ The first 6' of accessible inlet and outlet pipes are insulated so that coverage is complete and secure

☐ Pipe insulation is correct size for pipes

☐ Pipe insulation seams are sealed

Notes:

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Job Identifier #	Date	Installer	Certified Mentor

## 8.2 Install Low-Flow Faucet Aerators or Showerhead:

- ☐ Equipment is installed in accordance with manufacturer instructions and applicable building codes

Rated flows of new fixtures will be no more than:

- ☐ Showerheads – 2.5 gpm
- ☐ Faucet aerators – 2.2 gpm

Faucet aerator/showerhead is installed so that:

- ☐ There is no water leakage upon completion
- ☐ Fixtures are undamaged
- ☐ Fixtures are fully functional (verify by testing)

Notes:

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Job Identifier #	Date	Installer	Certified Mentor

## 9. Mobile Home Air Sealing

### 9.1 MH Duct Sealing:

- ☐ Holes are patched
- ☐ If flex or duct board, damaged section removed or replaced
- ☐ Duct surfaces to receive applied sealant are clean
- ☐ Supply boots are fastened to subfloor with mechanical fasteners
- ☐ Seams of each supply boot sealed
- ☐ Gaps between the subfloor and the supply boot sealed
- ☐ Air handler to trunk line connection is sealed
- ☐ Trunk line end of runs are sealed
- ☐ Branch duct to trunk line connections is sealed
- ☐ Crossover ducts sealed where applicable
- ☐ All seam connections are sealed with UL 181 B-M listed mastic

Notes:

Job Identifier #	Date	Installer	Certified Mentor

## 9.2 MH General Air Sealing:

- ☐ Bypasses and penetrations located in the floor sealed appropriately (garden tubs, clothes washers and dryer, sinks, return systems, baseboards, etc.)
- ☐ Bypasses and penetrations located in ceiling sealed appropriately (flue collar, soil stacks, speakers, trim moldings, etc.)
- ☐ Windows and doors weatherized appropriately based on conditions

Notes:

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Job Identifier #	Date	Installer	Certified Mentor

# 10. Mobile Home Insulation

## 10.1 MH Belly Insulation

**Preparation:**

- ☐ Worker inspected to ensure belly was prepared for insulation:
- ☐ Duct sealing from exterior is complete
- ☐ Gas, water, waste and electrical lines are safe, leak free and supported at least every 4’
- ☐ Water lines are insulated if needed
- ☐ Bottom board/belly fabric/rodent barrier is complete and sound enough to support insulation

**Insulation:**

- ☐ Cavities accessed to allow for consistent, uniform, and complete coverage
- ☐ Insulation installed to provide consistent, thorough coverage to specified R-value
- ☐ No more than 5 bags over-blown according to manufacturers' coverage chart
- ☐ Insulation has no gaps, voids, compression, or misalignment
- ☐ All openings made to install insulation in the air barrier are sealed in a durable, weather-tight manner
- ☐ Any removed skirting is reinstalled
- ☐ Job site cleaned
- ☐ Insulation certificate filled out

**Notes:**

Job Identifier #	Date	Installer	Certified Mentor



# 10.2 MH Ceiling Insulation

**Preparation:**

- ☐ All high-temp devices have been safely addressed
- ☐ Ventilation ductwork terminates to the exterior
- ☐ Plumbing stacks terminate to the exterior
- ☐ Recessed lights are IC-rated or replaced with IC-rated fixtures or equipped with inserts
- ☐ Roof/ceiling is in good repair
- ☐ Interior ceiling penetrations are sealed
- ☐ Dust control measures installed as needed

**Insulation:**

- ☐ Holes drilled or cavities otherwise accessed to allow for consistent, uniform coverage
- ☐ Insulation installed according to manufacturer requirements
- ☐ No more than 5 bags over-blown according to manufacturers' coverage chart
- ☐ Access points/holes repaired in a workmanlike manner
- ☐ Insulation certificate filled out

Notes:

Job Identifier #	Date	Installer	Certified Mentor