

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0009911		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address Mississippi State of P.O. Box 352 Jackson, MS 392050000		4. Program/Project Start Date 07/01/2023	5. Completion Date 06/30/2024

SECTION A - BUDGET SUMMARY

Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. Federal	81.042	\$ 0.00		\$ 2,419,331.00		\$ 2,419,331.00
2. 2022 Carryover			\$ 390,000.00		\$ 0.00	\$ 390,000.00
3.						
4.						
5. TOTAL		\$ 0.00	\$ 390,000.00	\$ 2,419,331.00	\$ 0.00	\$ 2,809,331.00

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) GRANTEE ADMINISTRATI ON	(2) SUBGRANTEE ADMINISTRATI ON	(3) GRANTEE T&TA	(4) SUBGRANTEE T&TA	
a. Personnel	\$ 34,661.00	\$ 0.00	\$ 29,711.00	\$ 0.00	\$ 64,372.00
b. Fringe Benefits	\$ 8,665.00	\$ 0.00	\$ 7,442.00	\$ 0.00	\$ 16,107.00
c. Travel	\$ 39,487.00	\$ 0.00	\$ 22,151.00	\$ 0.00	\$ 61,638.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 31,430.00	\$ 0.00	\$ 10,000.00	\$ 0.00	\$ 41,430.00
f. Contract	\$ 4,444.00	\$ 181,450.00	\$ 44,000.00	\$ 289,687.00	\$ 2,621,330.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
i. Total Direct Charges	\$ 118,687.00	\$ 181,450.00	\$ 113,304.00	\$ 289,687.00	\$ 2,804,877.00
j. Indirect Costs	\$ 2,279.00	\$ 0.00	\$ 2,175.00	\$ 0.00	\$ 4,454.00
k. Totals	\$ 120,966.00	\$ 181,450.00	\$ 115,479.00	\$ 289,687.00	\$ 2,809,331.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

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SECTION A - BUDGET SUMMARY						
Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1.						
2.						
3.						
4.						
5. TOTAL		\$ 0.00	\$ 390,000.00	\$ 2,419,331.00	\$ 0.00	\$ 2,809,331.00

SECTION B - BUDGET CATEGORIES					
6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) PROGRAM OPERATIONS	(2) HEALTH AND SAFETY	(3) LIABILITY INSURANCE	(4) LEVERAGING	
a. Personnel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 64,372.00
b. Fringe Benefits	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 16,107.00
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 61,638.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 41,430.00
f. Contract	\$ 1,504,752.00	\$ 265,544.00	\$ 29,394.00	\$ 0.00	\$ 2,621,330.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
i. Total Direct Charges	\$ 1,504,752.00	\$ 265,544.00	\$ 29,394.00	\$ 0.00	\$ 2,804,877.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 4,454.00
k. Totals	\$ 1,504,752.00	\$ 265,544.00	\$ 29,394.00	\$ 0.00	\$ 2,809,331.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

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SECTION A - BUDGET SUMMARY

Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1.						
2.						
3.						
4.						
5. TOTAL		\$ 0.00	\$ 390,000.00	\$ 2,419,331.00	\$ 0.00	\$ 2,809,331.00

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) FINANCIAL AUDITS	(2) Weatherization Readiness	(3)	(4)	
a. Personnel	\$ 0.00	\$ 0.00			\$ 64,372.00
b. Fringe Benefits	\$ 0.00	\$ 0.00			\$ 16,107.00
c. Travel	\$ 0.00	\$ 0.00			\$ 61,638.00
d. Equipment	\$ 0.00	\$ 0.00			\$ 0.00
e. Supplies	\$ 0.00	\$ 0.00			\$ 41,430.00
f. Contract	\$ 27,580.00	\$ 274,479.00			\$ 2,621,330.00
g. Construction	\$ 0.00	\$ 0.00			\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00			\$ 0.00
i. Total Direct Charges	\$ 27,580.00	\$ 274,479.00			\$ 2,804,877.00
j. Indirect Costs	\$ 0.00	\$ 0.00			\$ 4,454.00
k. Totals	\$ 27,580.00	\$ 274,479.00			\$ 2,809,331.00
7. Program Income	\$ 0.00	\$ 0.00			\$ 0.00

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IV.1 Subgrantees

Subgrantee (City)	Planned Funds/Units
LIFT, Incorporated (LIFT) (Tupelo)	\$248,767.00 15
Multi-County Community Action Service Agency (Multi-County) (Meridian)	\$584,932.00 44
Northeast Mississippi Community Services (Booneville)	\$260,388.00 16
Prairie Opportunity, Inc. (Starkville)	\$322,484.00 20
SOUTH CENTRAL CAA (Jackson)	\$780,948.00 64
Warren-Washington-Issaquena-Sharkey Community Action Agency (Greenville)	\$375,367.00 24
Total:	\$2,572,886.00 183

IV.2 WAP Production Schedule

	Units
Weatherization Plans	
Total Units (excluding reweatherized)	183
Reweatherized Units	0

Average Unit Costs, Units subject to DOE Project Rules	
VEHICLE & EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)	
A	Total Vehicles & Equipment (\$5,000 or more) Budget \$0.00
B	Total Units Weatherized 183
C	Total Units Reweatherized 0
D	Total Dwelling Units to be Weatherized and Reweatherized (B + C) 183
E	Average Vehicles & Equipment Acquisition Cost per Unit (A divided by D) \$0.00
AVERAGE COST PER DWELLING UNIT (DOE RULES)	
F	Total Funds for Program Operations \$1,504,752.00
G	Total Dwelling Units to be Weatherized and Reweatherized (from line D) 183
H	Average Program Operations Costs per Unit (F divided by G) \$8,222.69
I	Average Vehicles & Equipment Acquisition Cost per Unit (from line E) \$0.00
J	Total Average Cost per Dwelling (H plus I) \$8,222.69

IV.3 Energy Savings

Method used to calculate savings: <input checked="" type="checkbox"/> WAP algorithm <input type="checkbox"/> Other (describe below)			
	Units	Savings Calculator (MBtus)	Energy Savings
This Year Estimate	183	29.3	5362
Prior Year Estimate	144	29.3	4219
Prior Year Actual	149	29.3	4366

Method used to calculate savings description:

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The method used to estimate energy savings is the DOE WAP algorithm which uses results from national Weatherization Program evaluations to estimate energy savings per home. This method estimate of 29.3 MBTU will be used to calculate the total annual energy savings for each weatherized home in PY 2022.

Estimated 2023, number of homes **182 X 29.3 MBTU**= Total estimated energy savings **5,333 MBTU**'s resulting from DOE appropriated funds.

IV.4 DOE-Funded Leveraging Activities

N/A

IV.5 Policy Advisory Council Members

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

Dr. Johnny Gilbert	Type of organization: Other Contact Name: Phone: 6012095794 Email: jgilb38731@aol.com
Jean Marie Hill	Type of organization: Non-profit (not a financial institution) Contact Name: Phone: 6629311734 Email: jhill@gmail.com
Lawerence Johnson	Type of organization: Utility Contact Name: Robbie J Kemp Phone: 6019694830 Email: ljohns3@entergy.com
Morris Real Estate	Type of organization: Other Contact Name: Phone: 6014544737 Email: marlon.morris30@gmail.com
Mr. Robert Lesley, Atmos - Customer Service	Type of organization: Utility Contact Name: Phone: 6012091932 Email: Robert.Lesley@atmosenergy.com
Nicole Claiborne	Type of organization: Non-profit (not a financial institution) Contact Name: Phone: 6014971225 Email: mncaliborne@aol.com
Tasha Lee	Type of organization: Utility Contact Name: Phone: 6014842541 Email: tplee@southernco.com
Terrance Spears	Type of organization: For-profit or Corporate (not a financial institution or utility) Contact Name: Phone: 6015025716 Email: teespears65@gmail.com

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

Date Held	Newspapers that publicized the hearings and the dates the notice ran
04/13/2023	The State of Mississippi has prepared the FY 2023 Weatherization Assistance Program State Plan in accordance with Section 440.14 of 10 CFR Part 440. A public hearing was advertised in twelve (12) newspapers throughout the State and the hearing was held on April 13, 2023. The state application and Weatherization Program Production Schedule reflects the proposed weatherization activities, proposed subgrantees, and the allocations for each subgrantee, and the planned number of homes to be weatherized. Copies of the proposed State Plan is available to the general public and may be obtain from the Division of Community Services by calling (601) 359-4768 or 1-800-421-0762.

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IV.7 Miscellaneous

List below are the contact information on the Business Officer and Principal Investigator:

Recipient Business Officer

Mr. Robert Gilmon Anderson
Executive Director
Mississippi Dept. of Human Services
P.O. Box 352
200 South Lamar Street

Jackson, Mississippi 39201
(601) 359-4457

robert.anderson@mdhs.ms.gov

Recipient Principal Investigator

Tina M. Ruffin, Director
Division of Community Services
Mississippi Dept. of Human Services
P.O. Box 352
750 North State Street

Jackson, Mississippi 39205
(601) 359-4768

tina.ruffin@mdhs.ms.gov

**MISSISSIPPI DEPARTMENT OF HUMAN SERVICES
DIVISION OF COMMUNITY SERVICES**

Public Hearing Advertisement Process:

1. Division Director sets the Public Hearing date, time and location for the CSBG and LIHEAP Programs, and the Staff Officer, I sets the date, time and location for the DOE WX Program.
2. Deputy Director determines the date(s) the state plans have to be filed with the Secretary of State (SOS) Office (20 days before the public hearing).
3. Deputy Director generates Legal Ad Notice for the Public Hearing, a memo requesting publication of Legal Notice (and proof of advertisement), and submit the request (and Word document) to the Division of Budgets & Accounting, Office of Procurement Services contact person for processing.
4. Office of Procurement Services contact person sets up Purchase Order (1343) and submit the requested information to the MS Press Services via email.
5. MS Press Services emails a "draft" of the requested information along with the quote for advertisement to the Office of Procurement Services contact person and from there, Procurement Services emails the "draft" document to Community Services' Deputy Director for proofing.
6. Deputy Director approves documents to run on set date(s) listed in the requested memo and forwards email back to Procurement Services contact person.
7. Procurement Services contact person forwards the email to MS Press Services to move forward with the advertisement.
8. Deputy Director (CSBG/LIHEAP) or Staff Officer, I (DOE WX) - also verifies advertisement of hearing by checking on-line and/or the papers.

New for WX only:

- I. Deputy Director contacts a Court Reporting Company and request a quote for services to transcribe the minutes of the Public Hearing.
- II. Deputy Director accepts quote and forward the quote to the Special Projects Officer, II to set up

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a Purchase Order for payment.

**MISSISSIPPI DOE WEATHERIZATION ASSISTANCE PROGRAM (MSWAP) WEATHERIZATION READINESS FUNDS GUIDANCE
(WRF)**

Purpose: To reduce the frequency of deferred homes that require services that are outside the scope of weatherization, before the weatherization services can commence.

Objective: Ensure that WRF will bring the dwelling into weatherization readiness by addressing structural and health and safety issues. In addition, provide guidance on MSWAP use of WRF. Also, ensuring that the programmatic, and expenditures of WRF are in accordance to guidance provided by the State Office in accordance to WPN 23-4.

Guidance: WRF is specifically targeted to reduce the frequency of deferred homes that require services outside the scope of weatherization before the weatherization services can commence. Units receiving WRF must result in a DOE completion defined as: ***“A dwelling on which a DOE-approved energy audit has been applied and weatherization work has been completed.”***

The MSWAP Subgrantee must conduct a thorough inspection of the dwelling to identify all deferral issues to avoid multiple deferrals. The MSWAP Subgrantee will prioritize households for WRF based on the complexity of the job, the cost related to the issue, and must not pose significant threat, endangerment, or create a significant health concern. Also, MSWAP will execute the following:

- MSWAP WRF does not need to result in a DOE-funded completion within the same program year (PY). When installing measures utilizing WRF homes must be completed within **sixty (60) days** of completion of installed measures.
- In accordance with WPN 23-4, WRF funds are allowed to be utilized on the **annual DOE WAP and DOE BIL** weatherization project.
- MSWAP will not exceed the **“Average Cost Per Unit”** of **\$7,500**.
- MSWAP will track WRF for each building and unit at a minimum, capture measures/repairs and associated costs for reporting purposes utilizing the MSWAP Deferral Tracking form. **(See Attachment)**
- MSWAP must capture the following unit information when utilizing WRF.
 - Year Built;
 - Client name, address, job number, and phone number
 - Housing Type (site-built single family, manufactured housing, multifamily);
 - Nature of repairs needed which prohibit weatherization. Where applicable, identify multiple repairs or remediation reasons for a single building. *This is not an exhaustive list* and MSWAP will add repairs as needed.
 - Roof repair
 - Wall repair (interior or exterior)
 - Ceiling repair
 - Floor repair
 - Foundation or subspace repair
 - Exterior drainage repairs (e.g., landscaping or gutters)
 - Plumbing repairs
 - Electrical repair
 - Clean-up or remediation beyond typical scope of WAP
- a. Lead paint
- b. Asbestos (confirmed or suspected, including vermiculite), mold and/or moisture
- c. Other – please specify
 - DOE WRF expenditure per annual formula unit and building
 - DOE WRF expenditure per BIL unit and building; and
 - Leveraged fund expenditure per unit and building (i.e., funds such as Low-Income Home Energy Assistance Program, Housing and Urban Development, non-federal, etc. braided with WRF to make building weatherization ready).
- WRF Report must be submitted by the third (3rd) of each month.

Any other possible issue or repair not mentioned above will require the Subgrantee to record via the WRF Reporting Spreadsheet and notify DCS prior to utilizing WRF.

Restrictions:

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WRF will not be utilized for homes that exhibit dangerous conditions that may pose a significant threat, endangerment, or can create a significant health concern to the Subgrantee's staff, contractors, and/or crews.

- *Dwellings with issues or repairs that alter the value of a dwelling will not be permitted.*

Monitoring

The WRF will be monitored through the Monthly Homes Completed Reporting Spreadsheet. Subgrantees will be required to indicate and identify the homes where WRF was utilized on their Monthly Reporting Spreadsheet.

Additionally, the WRF will be monitored during yearly remote and onsite monitoring. The Subgrantee will be responsible for submitting documentation (e.g. invoices, etc.) with Monthly Homes Completed Reporting Spreadsheet.

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

V.1 Eligibility

V.1.1 Approach to Determining Client Eligibility

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

Eligibility- The State of Mississippi Weatherization Assistance Program (MSWAP) requires that every dwelling weatherized must meet the eligibility requirements.

Per regulation 10 CFR 440.22(a) and stated per 10 CFR 440.14(c) (6) (xii), the definition of "low income" for determining client eligibility for MSWAP has been established at or below 200% of the current federal poverty guideline.

In accordance with 440.16 (a), MSWAP requires each applicant household requesting WAP assistance complete an application intake process to determine client eligibility. The process consists of documenting household demographics, income verification, needs assessment, identity verification and other documentations as required.

Describe what household eligibility basis will be used in the Program

INCOME VERIFICATION Per 10 CFR 440.22

MSWAP will ensure that a dwelling unit is eligible for assistance and is occupied by a family unit, whose income is at or below 200% of the federal poverty guidelines and are in effect at the time of submission of the application. Applicants applying for weatherization that are on the waiting list or for other reasons must have their eligibility documentation updated at least annually. *Application Eligibility expires 12 months from certification date if work on dwelling unit (Energy Audit) has not been initiated.*

Priority is given to the elderly, persons with disabilities and families with children. Live-in attendant's income can be excluded if it is determined that (1) the live-in is essential to the care and well-being of the person; and (2) would not be living in the unit except to provide the necessary supportive services. All household members' status will be documented and maintained in Virtual ROMA 2.0, and individual client files for future references.

The following documents are acceptable when determining eligibility:

INCOME(S)

Income means Cash Receipts earned and/or received by the applicant before taxes during applicable tax year(s) **but not Income Exclusions** listed below. Gross Income is to be used, not Net Income.

Cash Receipts include the following:

1. Money, wages and salaries before any deductions;
2. 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. Regular payments from social security, railroad retirement, unemployment compensation, strike benefits from union funds, worker's compensation, veteran's payments, training stipends, alimony, and military family allotments;
4. Private pensions, government employee pensions (including military retirement pay), and regular insurance or annuity payments;
5. Dividends and/or interest;
6. Net rental income and net royalties;
7. Periodic receipts from estates or trusts; and
8. Net gambling or lottery winnings.

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Income Exclusions: The following Cash Receipts **are not** considered sources of Income for the purposes of determining applicant eligibility:

1. Capital gains;
2. Any assets drawn down as withdrawals from a bank;
3. Money received from the sale of a property, house, or car;
4. One-time payments from a welfare agency to a family or person who is in temporary financial difficulty;
5. Tax refunds;
6. Gifts, loans, or lump-sum inheritances;
7. College scholarships;
8. One-time insurance payments, or compensation for injury;
9. Non-cash benefits, such as the employer-paid or union-paid portion of health insurance;
10. Employee fringe benefits, food or housing received in lieu of wages;
11. The value of food and fuel produced and consumed on farms;
12. The imputed value of rent from owner-occupied non-farm or farm housing;
13. Depreciation for farm or business assets;
14. Federal non-cash benefit programs such as Medicare, Medicaid, Food Stamps, school lunches, and housing assistance;
15. Combat zone pay to the military;
16. Child support, as defined below
17. Reverse mortgages; and
18. Payments for care of Foster Children;

****Other documents may be necessary as required by Agency****

WPN 22-5: Extended Categorical Income Eligibility to HUD Means Tested Programs: This WPN simplifies (and supersedes) procedures previously outlined in WPN 17-4.

MSWAP understands that Subgrantees may certify that applicants have met the income requirements of HUD means-tested programs through mechanisms including, but not limited to:

1. Applicant documentation,
2. Interagency lists of recipients,
3. Shared system databases, etc.

Note: Method of verification of eligibility must be included in the client file.

There are three types of multifamily properties assisted by HUD: (1) housing owned and operated by HUD Public Housing Agencies (PHAs), (2) privately-owned multifamily buildings receiving project-based assistance, and (3) privately-owned multifamily buildings that house residents who receive tenant-based (housing voucher) assistance.

- Housing owned and operated by PHAs: MSWAP Subgrantees shall consider all such buildings managed by the PHAs referenced in this HUD Web page (https://www.hud.gov/program_offices/public_indian_housing/pha/contacts) to be 100 percent income eligible.
- Privately owned multifamily buildings receiving project-based assistance: MSWAP Subgrantees should refer to WPN17-4 lists to determine the percentage of the units in each building that are income eligible.
- Privately-owned multifamily buildings that house residents receiving tenant-based assistance: MSWAP Subgrantees will determine the percentage of income eligible residences by either contacting the building owner/manager to obtain such Section 8 Housing Choice Voucher records (from HUD's Tenant Based Rental Assistance Program [TBRA]) or by individually verifying which residents hold such vouchers.

PROOF OF ELIGIBILITY: MSWAP understands that proof of income eligibility must be clearly identified in the client file.

1. Availability of Supporting Documentation: For purposes of review and audit, each client file must contain an application from the client that contains the required demographics and income for the entire family living in the residence. The client file must also contain evidence provided by the Subgrantee that the client is eligible to receive Weatherization Assistance Program (WAP) services. This evidence may include, but is not limited to, a memorandum from a third-party certification office stipulating the income levels of the family or source

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documentation for each income source listed on the application. These documents can be stored electronically or retained in hard copy for each client.

2. **Eligibility Determined by Outside Agency/Program:** If income eligibility is determined by an outside agency or program, i.e. Low-Income Home Energy Assistance Program (LIHEAP) or the U.S. Department of Housing and Urban Development (HUD), any document used to determine eligibility, such as a copy of LIHEAP eligibility or a copy of the HUD eligibility (e.g., Section 8 or Public Housing eligibility) will suffice as evidence of client eligibility. This document and any related documents must be retained in the client file

3. **Self-Certification:** After all other avenues of documenting income eligibility are exhausted, self-certification is allowable. However, evidence of the various attempts at proving eligibility must be contained in the client file, **including** a notarized statement signed by the potential applicant indicating that the applicant has no other proof of income.

CHILD SUPPORT: Child Support payments, whether received by the Payee or paid by the Payor, **are not** considered Sources of Income to be added to the payee income or deducted from the payor income for the purposes of determining applicant eligibility.

1. **Payee:** Where an applicant receives Child Support from any state program or individual during an applicable tax year, such assistance **is not** considered income for the purposes of determining eligibility (i.e., where an applicant receives Child Support, he or she **does not** add that amount to his or her calculation of income for purposes of determining eligibility).

2. **Payor:** Where an applicant pays Child Support through a state program and/or to an individual, such assistance **is not** considered a deduction to Income for the purposes of determining eligibility (i.e., where an applicant pays Child Support, he or she **may not** deduct said assistance from his or her calculation of Income for the purposes of determining eligibility).

ANNUALIZATION OF INCOME: Where an applicant only provides income verification for a portion of the applicable tax year, their partial income may be annualized to determine eligibility.

Example: Applicant A only provides income verification for January, February and March. The method of annualizing income to determine eligibility could be to multiply the verified income by four to determine the amount of income received during the year.

MSWAP understands that the method of calculating annualized income is to be determined by the Grantee and must be applied uniformly by all Subgrantees.

RE-CERTIFICATION: An applicant must be re-certified when eligibility lapses due to the length of time the applicant was waiting to receive Weatherization services. As a reminder, re-certification of eligibility must occur at least every 12 months. The Grantee must outline the method of determining re-certification in their Annual Plan for approval by DOE.

VALID PHOTO ID(S)

1. Photo Driver's license, US Passport
2. State-issued photo ID
3. Employment ID
4. School, college or university ID
5. US Military ID
6. Tribal ID, Alien registration/Permanent residence card, temporary residence card

SOCIAL SECURITY CARD(S)

1. Certified Copies
2. Card for all household members regardless of age

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

Qualified Aliens Eligibility for Benefits

If the Head of Household is an undocumented Individual, the application should be denied for the entire household.

If an individual within a household is an undocumented Individual, does not disclose citizenship or establish satisfactory immigration status, ineligibility exists only for the individual member and not the entire household. The remaining household members should have eligibility determined. During the application process,

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any individuals within the household who do not wish to comply with citizenship and documented status requirements are considered "Non-Applicants" and should not be questioned about citizenship/documentated status. However, these individuals must disclose and verify income and other information needed to establish the eligibility of the household. Eligibility cannot be determined when a Non-Applicant fails to disclose income, therefore, the application should be denied for the entire household. If adequate documentation of immigration status is subsequently provided for the Non-Applicant, the worker shall act upon the reported change in accordance with appropriate timeliness standards.

Most undocumented Individual who have entered the United States legally have in their possession documents that were issued by the United States Citizenship and Immigration Services (USCIS) which contains the person's immigration status and the date that person entered the country, or adjusted to the status shown on the card. It is the responsibility of the applicant to provide the USCIS documents prior to eligibility determination. If the applicant does not provide documents establishing documented status on a timely basis or if documented status is questionable, the eligibility of the remaining household members shall be determined.

The most common documents used to verify alien status include, but are not limited to:

- Form 1-551- Resident Alien Card and Conditional Resident Alien Card
- Form 1-151- Alien Registration Receipt Card
- Form 1-94- Arrival-Departure Record (Annotated with Section 207 or refugee, asylum, or paroled)
- Form 1-688- Temporary Resident Card
- Unexpired foreign passport when it contains an endorsement "Processed for 1-551. Temporary Evidence of Lawful Admission for Permanent Residence"

When a household or person indicates inability or unwillingness to provide documentation of alien status for any household member, that (non-applicant) member should be classified as "Ineligible", not illegal. Workers are cautioned that a determination that a person is Ineligible is not equivalent to a determination that a person is an illegal alien.

A person will be reported to the appropriate USCIS office under the following circumstances:

1. The applicant, another household member or the authorized representative admits
that undocumented Individual (s) are present in the household;
2. USCIS documents presented by the household during the application process are determined to be
forged;
3. A formal order of deportation or removal is presented by the household during the application
process.

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

In accordance with WPN 23.3, In order to meet the purpose of Weatherization Assistance Program, MSWAP will 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).

MSWAP and Subgrantees shall ensure that weatherization take place with a whole dwelling as a system approach (10 CFR 440.22(b)). A single unit within a multi-unit dwelling is not categorically excluded, but due to the rare instances when this is allowable, MSWAP shall seek prior approval from the Project Officer (PO).

MSWAP requires that dwelling eligibility is established before any weatherization commence. Dwelling eligibility is confirmed prior to the start of an energy audit. Proof of ownership must be established regardless of who is living in the dwelling (required for both owner-occupied, and rental units). *Lifetime estates are to be treated as owner occupied dwellings. The following documents are acceptable as proof of ownership and eligibility:*

RESIDENCE VERIFICATION

1. Lease Agreement

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2. Copy of Deed;
3. Statement from the Office of the Tax Assessor or Chancery Clerk.
4. Copy of Mortgage or Mortgage Payment Book;
5. Property Tax Receipts (must show address of property to be weatherized)

Describe Reweatherization compliance

Re-Weatherization: MSWAP shall adhere to the following:

In accordance with the Consolidated Appropriation Act of 2021, amended 42 USC 6865(c) (2) to read as follows:

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.

This provision gives Subgrantees the flexibility to revisit those homes weatherized 15 years prior that may not have received the full complement of Weatherization services, including the use of an advanced energy audit or addressing health and safety concerns.

All homes previously weatherized regardless of *other Federal programs*, all Federal funds including LIHEAP, HUD, or USDA weatherization activities will be documented via Virtual ROMA 2.0 and Excel Reporting Spread sheets:

- Subgrantee must ensure that homes seeking re-weatherization must meet the criteria stated above.
- **Subgrantees must ensure that any re-weatherization project will receive a current energy audit prior to re-weatherization.**
- Subgrantees must reference applicant's names, social security number, and address utilizing Virtual ROMA and excel reporting spread sheets.
- Subgrantee must perform a QCI final inspection and provide the case worker and partnering agency with the final status, which must be documented in the client Virtual ROMA file reflecting that the dwelling (s) were weatherized.
- If upon pre-inspection of a dwelling it is determined that the home was previously weatherized, subgrantee must document the address of dwelling referencing Virtual ROMA and the Excel data spread sheet.
- WX subgrantee must complete and submit to DCS the WX monthly reports, which includes the client list (names, address, phone etc.) via excel spread sheet. This is checked monthly by the state weatherization staff for compliance.

NOTE: The term "Reweatherization" applies only to those units which fall into the timeframe indicated

above and described under 10 CFR §440.18(e)(2)(iii).

Describe what structures are eligible for weatherization

MSWAP will address the following structures:

- Single-Family - owned or rental
- Manufactured housing - own or rental
- Multi-family housing – own or rental
- ***Non-traditional dwelling units such as shelters apartments over business etc. MSWAP will consult with the Project Officer to ensure that program regulations are met, and whether the unit is, in fact, eligible.***
- Non-stationary campers and trailers that do not have a mailing address associated with the eligible applicants is not allowed. The use of a post office box for a non-stationary campers or trailers does not meet this requirement.

Disaster Planning and Relief (WPN 12-7):

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MSWAP understands that weatherization has a very limited role in any disaster response plan. Therefore, the State ensures that WPN12-7 will be adhered to when addressing disasters.

Describe how Rental Units/Multifamily Buildings will be addressed

Rental Procedures (WPN 22-13)

The MSWAP will utilize a rental agreement which follows and addresses the requirements of 10 CFR 440.22(b)(3) and 10 CFR 440.22(c)-(e). The restriction regarding the time when an owner can increase the cost of the unit is two (2) years.

Before the weatherization of any dwelling is allowable, proof of ownership must be established regardless of who is living in the dwelling (required for both owner-occupied and rental units). Lifetime estates are to be treated as owner occupied dwellings. The following documents are acceptable as proof of ownership:

- 1) Copy of Deed;
 - 2) Copy of Mortgage or Mortgage Payment Book;
 - 3) Property Tax Receipts (must show address of property to be weatherized); or
 - 4) Statement from the Office of the Tax Assessor, Chancery Clerk, or Record of Deeds.
- 5) Lease Agreement

If a dwelling is to be weatherized for a client who is not the owner of the dwelling, an agreement must be entered into between the landlord and the subgrantee agency. The agreement must be signed before work can begin on the weatherization project. ***Landlord participation is encouraged but not mandatory.*** Participation may be provided through donated materials, monetary assistance or a combination of the two. A condition of the agreement includes the agreement not to raise the tenant's rent for two (2) years (some exceptions apply) beginning on the date of the weatherization projection completion (that is the approved post inspection date). Additionally, the owner cannot evict the tenant without cause during that period. Should the owner choose to violate the agreement, he or she may be billed for the pro-rated share of cost of the weatherization project.

The allowable exceptions to the prohibition of the two (2) year rent increase include increases due to higher property taxes, insurance premiums, necessary replacement (or extensive repairs) to appliances, plumbing, or wiring. These allowable costs must be spread over the period of one (1) year.

The owner agrees that the dwelling is not presently being offered for sale and agrees to give the subgrantee agency thirty (30) days' notice of the sale should the property be offered for sale prior to the expiration of the rental agreement. At least ten (10) days prior to the sale, the owner agrees to obtain a notarized statement of the purchaser's consent to assume the rental agreement obligation. If this consent is not obtained, the owner agrees to pay the full cost of the weatherization project based on the pro-rated number of months remaining in the rental agreement. Should the property be transferred via a will or heirship, the same obligations would be placed on the new owners.

Additionally, the owner agrees that the terms and obligations of the rental agreement shall supersede any inconsistent provision of any oral or written lease or other agreement affecting the rent collected for the eligible dwelling unit.

Multi-Family Dwellings Per WPN 22-12: In order to meet the purpose of the WAP, MSWAP will 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 multi-family buildings). MSWAP understands that, certain buildings containing rental units may comply with the income eligibility requirements when 50 percent of those dwelling units are eligible dwelling units rather than the established 66 percent identified in the regulation. 10 CFR §440.22(b) (2). The buildings that are subject to the 50 percent threshold are duplexes, four-unit buildings, and certain eligible types of large multifamily buildings. MSWAP will follow 65 Fed. Reg. 77210, Dec. 8, 2000, when determining what types of large multifamily buildings may be subject to the 50 percent threshold.

It is noted that in qualifying a multi-family building for weatherization, MSWAP understands that 10 CFR 440.22(b)(2) requires that a building containing rental dwelling units is eligible for WAP funds where "Not less than 66 percent (50 percent for duplexes and four unit buildings, and certain eligible types of large multifamily 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

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MSWAP understands that “certain eligible types of large multifamily buildings” are those buildings for which an investment of DOE funds would result in a significant energy-efficiency improvement because of the upgrades to equipment, energy systems, common space, or the building shell. MSWAP do not have a DOE-approved audit and procedures for multifamily buildings, therefore, the following actions will be taken:

MSWAP will follow Weatherization Program Notice 22-12 when addressing requirements for determining eligibility of certain multi-family buildings and will seek guidance from the Project Officer when addressing the above stated criteria.

Describe the deferral Process

DEFERRAL STANDARDS

MSWAP understands that the decision to walk-away from a dwelling without providing weatherization services is difficult but necessary in some cases. Many problems encountered in low-income housing are beyond the scope of the Weatherization Assistance Program. Deferrals does not mean that assistance will never be available, but that any work deemed beyond the scope of WAP must be postponed until the problems can be resolved, and alternative sources of help be found, as necessary. Subgrantees Coordinator(s) must follow the deferral guidelines included in the Health and Safety Plan. Subgrantees must complete and have on file, the Walk Away/Deferral WRF Tracking form when determining deferrals **(See Attachments)**. **Subgrantees must submit to DCS monthly all deferrals via the Deferral/WRF Reporting Spreadsheet, which is reviewed by DCS WX Staff.**

Weatherization Deferrals/Readiness Funds (WRF) (WPN 23-4)

MSWAP understands that, Per H.R. 2471, the Consolidated Appropriations Act, 2022 MSWAP can address necessary repairs (e.g., health and safety issues structural issues) in dwellings that have been deferred from receiving weatherization services. Deferrals occur in WAP for two key reasons: regulatory (10 CFR 440) limitations and/or management decisions at the state and local levels. Regardless of the cause, deferrals create “sunk costs” – the cost of sending field staff out to evaluate a home that cannot ultimately be treated because the Program is unable to address the repairs of the building.

When using WRF, MSWAP will follow the provided guidance **(See Miscellaneous)**, and complete the Deferral/WRF tracking form. **(See Attachment)**

V.1.3 Definition of Children

Definition of children (below age): **19**

V.1.4 Approach to Tribal Organizations

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

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

The low-income members of tribal organizations shall be entitled to apply and receive weatherization assistance, as provided to other low-income persons in the State, through the normal channels of the State of Mississippi Weatherization Assistance Program (MSWAP) in accordance with 10 CFR440.16 (f).

V.2 Selection of Areas to Be Served

In accordance with 10 CFR 440.14 (c) (6) (ii), preference is given to Community Action Agencies and other public or private nonprofit entities. MSWAP will enter in agreement with six (6) subgrantees statewide for PY2023, which allows all 82 counties to be served in a timely and effective manner. In the event that an agency cannot fulfill the terms of the contract the state will award the funding of that agency to another performing agency to carry out the terms.

Every weatherization subgrantee will be a community action agency or other public or private nonprofit entity with a track record of implementing similar low-income programs and will be in accordance with 10 CFR 440.14 (c)(6)(ii). The subgrantees experience and performance in weatherization or housing rehabilitation activities and experience in providing assistance to low-income persons in the service area in accordance with 440.15 (a) (2) (I) (ii) (iii) and ability to implement a timely and effective weatherization program, through timely submission of Monthly Progress Reports, as well as planned versus actual homes weatherized are also factors which will be considered. Preference is also given to entities that achieve weatherization goals, Perform work according to the Standard Work Specifications (SWS) and that have sufficient staff capabilities in accordance with 440.15(a)(3)(I)(ii)(iii)(iv).

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Should it become necessary to terminate, downsize or select subgrantees, it will be discussed at a hearing in accordance with 440.14 (a) and upon the basis of the criteria provided in 440.15(a).

V.3 Priorities

In accordance with 10 CFR 440.16 (b), priority is given to elderly, disabled, families with children, high-energy users and high-energy burden as describe in 10CFR 440.3. The State of Mississippi requires that the Weatherization Assistance Selection Tool (Form WX-7) be completed on all eligible applicant prior to the selection for assistance. This form allows subgrantees to rank potentially eligible applicant, taking into consideration the following:

- Elderly Persons
- Families with children
- Persons with Disabilities
- High Energy Burden (10 CFR 440.3) - *low-income household whose residential energy burden (residential expenditures divided by the annual income of that household) exceeds the median level of energy burden for all low-income households in the State. This selection process will allow clients that apply to be placed on the service list according to the selection tool ranking. (See Attachment for Selection Tool)*
- High Energy Users- *low-income household whose residential energy expenditures exceed the median level of residential expenditures for all low-income households in the State.*
- Poverty Level

This selection process will be incorporated into the Virtual ROMA 2.0 System, allowing clients that apply to be placed on the service list according to the selection tool ranking. *(See Attachment for Selection Tool)*

The monthly and quarterly reports capture required data relating to High Energy Burden and High Energy Users. Reporting on these areas MSWAP will utilize the PAGE reporting system.

V.4 Climatic Conditions

According to the State Climatologist Office at Mississippi State University, Mississippi is located in the humid subtropical climate region, characterized by temperate winters; long, hot summers; and rainfall that is fairly evenly distributed through the year. However, the state is subject to periods of both drought and flood, and the climate rarely seems to bring "average" conditions. More typical would be an expectation of "feast or famine" with regard to weather events as the climate delivers energy and moisture in subtropical latitudes between a large landmass to the north and the Gulf of Mexico to the south.

Prevailing southerly winds provide moisture for high humidity and potential discomfort from May through September. Locally violent and destructive thunderstorms are a threat on an average of about 60 days each year. Eight hurricanes have struck Mississippi's coast since 1895, and tornadoes are a particular danger, especially during the spring season.

Normal mean annual temperatures range from 62F in the north to 68F along the coast. Low temperatures have dropped to 16F below zero while high temperatures exceed 90F over 100 days each year. Temperatures routinely exceed 100F at many places in the state each year and drop to zero or lower an average of once in five years in the state. Freezing temperatures reach the Gulf coast almost every winter. Normal precipitation ranges from about 50 to 65 inches across the state from north to south. Measurable snow or sleet falls on some part of the state in 95% of the years.

In essence, Mississippi has a climate characterized by absence of severe cold in winter but by the presence of extreme heat in summer. The ground rarely freezes and outdoor activities are generally planned year-round. Cold spells are usually of short duration and the growing season is long. Rainfall is plentiful, but so are dry spells and sunshine.

The State of Mississippi is divided into three climatic regions. Listed below is a comparison of 2022 to 2021 Heating and Cooling Degree Days according to the National Weather Service and the Weather Data Depot (<http://www.weatherdatadepot.com/>) per region.

	2021	2022	+/-	2021	2022	+/-
			Comparison			Comparison

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Region	Heating Degree Days (HDD)	Heating Degree Days (HDD)	% Increase/Decrease Days	Cooling Degree Days (CDD)	Cooling Degree Days (CDD)	% Increase/Decrease Days
Tupelo (Region # 1) <i>North MS</i>	1658	1888	-12%	3305	3523	-6%
Jackson (Region # 2) <i>Central MS</i>	1329	1480	-10%	3553	3621	-2%
Gulfport (Region # 3) <i>South MS</i>	819	970	-16%	3935	4149	-5%

These climatic variances within the State affect how the weatherization program is designed and targets the number of units weatherized. It also affects energy savings realized in different regions, as well as energy usage and cost (labor/material).

V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials

Table 1 – FG Approvals

Installation Standards/Field Guide Type	Approval Expires
Site-Built Single-Family Housing	6/3/2026
Manufactured Housing	6/3/2026
Large Multifamily Housing	N/A

Table 1 - Audit Approvals

Tool	Building Type	Expiration Date
WA v8.9 (NEAT)	Site-Built Housing (SBH) (1-4 Units)	4/13/2025
WA v8.9 (MHEA)	Manufactured Housing (MH)	4/13/2025
N/A	Small Multifamily (SMF) (5-24 Units) -SMF requires case-by-case DOE approval	
N/A	Large Multifamily (LMF) (25+ Units)- SMF requires case-by-case DOE approval	

MSWAP will utilize the Mississippi Weatherization Field Guide, SWS's, 10 CFR 440 Appendix A and the NEAT/MHEA Audits, to ensure that all work is being performed in accordance to the DOE approved energy audit procedures.

MSWAP provides a Notification of Funds Availability (NOFA) to subgrantees, which is use to formulate and submit a contract proposal. The NOFA consist of WAP fiscal, programmatic, and technical requirements that must be adhered to in order to administer the Weatherization Assistance Program. To ensure that subgrantee are in receipt of the Field Guide and other requirements, MSWAP requires the following along with subgrantee contract proposal:

- **Subgrantee Weatherization Field Guide Acceptance Form** *(See attached form 11)* - This form certifies that said organization will comply with the provisions of WPN 22-4. Subgrantee agrees to ensure that all tasks performed on client(s) homes meet the specifications, objectives and desired outcome for Home Energy Upgrades Standard Work Specifications (SWS) where applicable. Applicable tasks are those tasks addressed in the Standard Work Specifications for Home Energy Upgrades for Single Family, Multi-Family, and or Manufactured Homes. Furthermore, subgrantee will ensure training to all contractors/vendors on the Weatherization Field Guide and Standard Work Specifications (SWS) prior to the commencement of weatherization work. In addition, confirm that subgrantee have read and received both, the link to the online version and hard copy of the Mississippi Weatherization Field Guide and Standard Work Specifications. Subgrantee must *ensure that all tasks performed on client(s) homes meet the*

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specifications, objectives and desired outcome for Home Energy Upgrades Standard Work Specifications (SWS) where applicable. Applicable tasks are those tasks addressed in the Standard Work Specifications for Home Energy Upgrades for Single Family, Multi-Family, and or Manufactured Homes

- **Contractors Weatherization Field Guide Acceptance Form (See attached form 12)** - This form certifies that the contractor/vendor will comply with the provisions of WPN 22-4 (The contractor agrees to ensure that all tasks performed on client(s) homes meet the specifications, objectives and desired outcome for Home Energy Upgrades Standard Work Specifications (SWS) where applicable. Applicable tasks are those tasks addressed in the Standard Work Specifications for Home Energy Upgrades for Single Family, Multi-Family, and or Manufactured Homes. The contractor further agrees, and understand that compensation will only occur once the job passes inspection by the agency representative/QCI on final post inspection. Furthermore, the contractor confirm that the subgrantee agency have provided training on the Mississippi Weatherization Field Guide and Standard Work Specifications. In addition, confirm that he/she have read and received both, the link to the online version and hard copy of the Mississippi Weatherization Field Guide.
- **Certifications Data Form (See attachment)**-subgrantees must provide a list of all WX Staff certifications.
- **Link to Field Guide - <https://wxfieldguide.com.ms>**

Field guide types approval dates

Single-Family: 6/3/2021
Manufactured Housing: 6/3/2021
Multi-Family:

V.5.2 Energy Audit Procedures

Audit Procedures and Dates Most Recently Approved by DOE

Audit Procedure: Single-Family Audit Name: NEAT Approval Date: 4/13/2020
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Audit Procedure: Manufactured Housing Audit Name: MHEA Approval Date: 4/13/2020

Audit Procedure: Multi-Family Audit Name: Approval Date:
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Comments

Table 1 – FG Approvals	
Installation Standards/Field Guide Type	Approval Expires
Site-Built Single-Family Housing	6/3/2026
Manufactured Housing	6/3/2026
Large Multifamily Housing	N/A

Table 1 - Audit Approvals		
Tool	Building Type	Expiration Date
WA v8.9 (NEAT)	Site-Built Housing (SBH) (1-4 Units)	4/13/2025
WA v8.9 (MHEA)	Manufactured Housing (MH)	4/13/2025
N/A	Small Multifamily (SMF) (5-24 Units)	SMF requires case-by-case DOE approval
	Large Multifamily	SMF requires

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N/A	(LMF) (25+ Units)	case-by-case DOE approval
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MSWAP will utilize the NEAT/MHEA Audits when addressing dwellings. **MSWAP will comply with 10CFR 440.21 (i) when submitting for audit approval.**

Single Family/Manufactured Housing (April 13, 2020) (Expires 4/30/2025)

NEAT/MHEA must be performed to ensure that a favorable SIR is determined before any measure is performed.

Multi-Family Dwellings - No approved audit, DOE approve on case by case.

MSWAP do not have a DOE-approved audit and procedures for multifamily buildings, therefore, the following actions will be taken:

- MSWAP will follow Weatherization Program Notice 22-12 when addressing requirements for determining eligibility of certain multi-family buildings as identified by the Department of Housing and Urban Development (HUD) and the Department of Agriculture (USDA).
- MSWAP understands that the Project Officer will review and approve project(s) on a case-by-case basis in the absence of a multifamily energy audit. MSWAP will submit to the Project Officer the necessary materials needed to seek approval of the multifamily project prior to commencing weatherizing the building (e.g. engineering assessment, audit input/output).

V.5.3 Final Inspection

Listed below are the procedures utilized to ensure that no dwelling unit is reported to DOE as completed until all weatherization measures have been installed and the Subgrantee, or its authorized representative, has performed a final inspection(s) including any mechanical work performed and certified that the work has been completed in accordance with the NEAT/MHEA Audits, Standard Work Specifications (SWS) and audit procedures required by 10 CFR 440.21 and 10 CFR440 Appendix A.

- All home inspections, pre and post, must be accompanied with before and after pictures.
- When reporting homes as completed, subgrantees must submit for review, the following documentation:
 1. Pre-Inspection Audit
 2. NEAT/MHEA Work Order (s) (HVAV, Contractors and Change orders)
 3. Pre-Audit photo's
 4. NEAT/MHEA Audit
 5. Audit Input Report
 6. Invoices/Receipts
 7. Contractors Agreements
 8. Post-Inspection Audit
 9. Post-Audit Photo's
- Pictures must be made available for all Pre and Post Readings (pictures must show reading on the equipment).
- Agencies are required to conduct a mandatory pre and post-test on dwelling.
- The same Coordinator who conducts the pre-test cannot conduct the post test.
- All Post Inspections (WPN 22-4) **must be** completed by a **Certified Quality Control Inspector**. If one is not on staff, subgrantees **must contract** the post inspections out to a certified QCI or partner with a local CAP Agency that have certified staff to preform inspections.

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- The Pre and Post-test must include all diagnostic testing where applicable.
- When the Post Inspector (QCI Final Inspector) finds work that need to be re-addressed the contractor must be contacted and provided corrective action documentation on areas that must be re-addressed. In cases where there is a third party, Local CAP, or State QCI, reports must be submitted to the agency for execution of corrective actions. Upon completion of work, the Post Inspector (QCI) must follow-up to ensure work was performed to in accordance to the SWS's before payment is rendered. QCI must perform diagnostic testing to ensure the health and safety of the project.
- MSWAP requires that QCI final inspection must ensure that all materials were utilized in accordance with the approved work scope. If all materials were not installed, subgrantees must complete a Materials Transfer Form, which identifies the unused materials and return items to the agency for proper adjustments. This form must be signed by the Executive Director and maintained in the client file. Materials returned to the vendor must be documented on a Change Order Form for proper processing and filed in the client's file. Additional materials needed to complete a measure requires a new work scope and material list must be created and maintained in client file. A final post inspection must take place after completion of all work.
- If it is determined that materials are missing or not used on the job, agency must conduct an investigation and provide a report to DCS. The individuals involved will be immediately terminated from participation in the Weatherization Program.

All Quality Control Inspections must be in accordance to SWS and Field Guide. Failure to comply may result in the following:

1. DCS will provide subgrantees with written notice concerning the QCI area of concerns.
2. DCS will require that the Subgrantee provide a written plan of action, which must follow the suggested training plan.
3. DCS will follow-up with additional monitoring of the QCI assigned jobs.
4. Failure to comply may result in termination of the QCI or suspension of the program for non-compliance.

V.6 Weatherization Analysis of Effectiveness

MSWAP has established the policy of evaluating subgrantees program effectiveness. A quality rating (**Good, Fair, and Poor**), shall be established by consideration of factors including, but not limited to:

Program Administration

1. Program files and accuracy and timely completion/submission of reports.
2. Work quality and oversight.
3. Monitoring reports.
4. Proper invoicing techniques.
5. The practice of using DOE funds to return to previously completed homes to make adjustments or include additional measures not done on the initial visit and after unit was reported to DOE as completed.
6. Proper designation of allowable administrative expenses between administration and program support categories.

Performance Analysis

1. Proper documentation of determining eligibility.
2. Number of Elderly, Disabled, Children, High Energy User, and Households with High Energy Burden served.
3. Expenditures verses number of dwellings weatherized. Production quotas and expenditures.
4. Carbon Monoxide, Blower Door, Refrigerator testing.
5. Client education.
6. Health and Safety Practices.
7. Referrals from LIHEAP/CSBG.
8. Securing of additional funding from other agencies and programs.
9. Proper use of Priority Measures/Weatherization measures selected.
10. Pre-Inspection.
11. Final inspection/Re-inspections and follow-up.
12. Lead safe weatherization work practices and mold and moisture checklist.

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13. Personnel training.
14. Required signatures.
15. Program files, accuracy, and timely completion/submission of reports.
16. Work quality and oversight.
17. Monitoring reports.

MSWAP measures productivity via weekly and monthly subgrantee reporting. The Subgrantees are required to submit the following:

Weekly Reports:

- The number of homes completed
- Type of fuel
- Demographic information

Monthly Reports:

- Final report on homes completed *(Along with required documentation. See V.4)*
- Final report on types of fuel
- Final demographics report
- Final Monthly Expenditures, and
- Energy savings report.

The above reports will be compared monthly to ensure cost effectiveness, accountability, quality of service and adequate training is provided.

If the findings are determined based on a flagrant and/or frequent noncompliance, this is considered to be a serious impact on the agency's ability to continue to operate the program effectively. Steps will be taken to suspend or terminate funding.

Once an agency is placed on special conditions either a conditions plan of action will be put in place or as stated above funding will be suspended or terminated. The decision for removal of special conditions will be based on the following:

- The nature of the findings yielding the special conditions (are the same findings recurring?)
- The agency's responsiveness to the special conditions (were the findings resolved promptly? Completely? With attention to the cause of the finding?)
- The Program Manager's assessment of the agency's potential for improving overall performance to an acceptable level.

V.7 Health and Safety

(See Attachments for Health and Safety Plan)

V.8 Program Management

V.8.1 Overview and Organization

Overview and Organization

The Mississippi Weatherization Assistance Program (MSWAP) is located in the Division of Community Services (DCS), which is a division of the Mississippi Department of Human Services. Attached is a copy of the Division of Community Services Organizational Chart. The chart provides job titles such as Staff Officer I (Programs Manager), Branch Director II (QCI) and admin staff.

As well as the Weatherization Assistance Program, the Division of Community Services administers the Low Income Home Energy Assistance Program (LIHEAP), the Community Services Block Grant (CSBG), and the temporary Low Income Home Water Assistance Program (LIHWAP). MSWAP have memorandum of understandings (MOU's) with both CSBG, LIHEAP, which assist with heat, cooling and areas that fall outside the scope of weatherization.

MSWAP will utilize six subgrantees to administer weatherization services across eighty-two counties.

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V.8.2 Administrative Expenditure Limits

Under 10 CFR 440.18(e) for administrative purposes -- no more than 7.5 percent of the new PY allocation will be used by the state, and not less than 7.5 percent will be made available to Subgrantees. DCS understands that Subgrantees with allocations of less than \$350,000 may be eligible to receive an additional 5 percent of administrative funds based on criteria developed by DCS. Should DCS elect this option, DCS will describe the procedures used for approval to provide additional administrative funds to qualified Subgrantees as specified in 10 CFR 440.18(d). DCS will take caution, and only use the **new PY total allocation funds** in determining the administrative allowances.

The State of Mississippi/DCS will ensure that funds are allocated to areas based on relative need for the project. Funds will be allocated to subgrantees based on the level of poverty as determined by the most recent census statistics in accordance with 440.15(b). Financial assistance will be used to supplement and not supplant state or local funds in accordance with 440.16 (c). The Subgrantees will be required to coordinate with other programs to the maximum extent possible is in accordance with 440.16 (d). DCS is a participant in a comprehensive planning group designed to provide the greatest benefit to the client while mutually accommodating the involved parties via referrals and leveraged activities.

V.8.3 Monitoring Activities

MSWAP will utilize WPN 20-4 when establishing a monitoring plan to ensure quality workmanship, financial and programmatic accountability, and adherence to federal/state regulations as well as contractual agreements.

In accordance with WPN 20-4, the Independent QCI will be utilized when addressing the comprehensive monitoring reviews of client files and subgrantees' records, as well as inspection of at least **10 percent of each subgrantees** DOE-funded completed units.

The Division of Community Services has met with the Office of Compliance, Division of Monitoring (DM). Monitoring schedules will be coordinated so that DCS staff will complete the technical review during the same time DM is monitoring the financial and administrative. The T&TA report from DCS will be included as part of the official monitoring report issued by DM.

The programmatic monitoring system has been designed to provide a systematic method of identifying program strengths and weaknesses, a basis for assisting agencies by improving program operations and for continuing the flow of information between the subgrantee level and DCS which is necessary for problem identification and resolution.

The State will conduct fiscal desk and/or on-site monitoring visits of each subgrantee in accordance with 10 CFR 440.23(d), 10 CFR part 600 and OMB Circular 110, Attachment F, as applicable. Those agencies having weaknesses in any area will be monitored and technical assistance provided as necessary to ensure program and fiscal compliance.

Procedures:

Monitoring visits will normally be scheduled and confirmed at least one week prior to the visit. However, the State does reserve the right to conduct unscheduled monitoring visits. Programmatic and Fiscal Monitoring functions will be performed by Division of Monitoring, a division within the MDHS and Technical Monitoring by the Division of Community Services (DCS).

- Programmatic & Fiscal Monitoring (Grantee T&TA Administrative): This is conducted by
The Division of Monitoring and budgeted at 5%, at 2 staff members.
- Technical Monitoring (Grantee T&TA Technical Monitoring): This will be conducted by The
Division of Community Services and budgeted at 52% at 2 staff members.

An entrance conference will be conducted with the subgrantees Executive Director or a designee to explain the purpose of the visit. Program operations of subgrantees are reviewed randomly by the Division of Monitoring. These internal audits are conducted in accordance with the General Accounting Office's "Standards for Audits of Governmental Organizations, Programs, Activities, and Functions" and generally accepted auditing standards established by the

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American Institute of Certified Public Accountants. Additionally, this office seeks to target those entities with large allocations and agencies with demonstrated problems. Random Technical reviews will be conducted by DCS Technical Staff.

Although each subgrantee is required to contract with an independent audit firm for audits, they must be submitted to MDHS/DCS per the MDHS Subgrantee Manual as well as uploaded in the Federal Clearing House Data Base. All Single Audit Reports are reviewed and reconciled by the MDHS-Division of Monitoring.

The Division of Monitoring will complete a written report of the administrative and fiscal review. DCS technical staff will complete a written report of the programmatic and field work performance. The Director of Monitoring and the DCS director will review the report before it is forwarded to the agency. DCS will conduct desk and site reviews to ensure procedures are followed according to the standard work specifications. **All noted findings will be provided to subgrantees in writing within thirty days after the monitoring visit.** Deficiencies in fiscal, program operations or Technical assessments, which are not properly corrected according to instructions, may result in suspension of funds or termination.

Findings

1. Any of the following criteria generally constitutes a Finding:

- a) Violation of eligibility guidelines.
- b) A health or safety condition that affects clients, subgrantee staff and subgrantee subcontractors, or the integrity of the building structures that was created by, exacerbated by, or not corrected by the delivery of Weatherization services.
- c) The omission of a required measure or technique with major energy savings potential.
- d) Work not performed to the standard work specifications (SWS).
- e) Expenditure of Weatherization Assistance Program funds on measures that are not approved under the Weatherization Assistance Program or required for health or safety reasons.
- f) Major expenditure of funds on measures that do not yield a NEAT or MHEA generated savings-to-investment ratio of one or greater.
- g) False documentation on pre and post audits.
- h) Failure to track un-used materials.
- i) Failure to maintain client file documentation according to procedures.

2. An Onsite Assessments Report that contains a Finding:

- a) Requires an immediate response from the subgrantee.
- b) Requires corrective action be taken.
- c) May result in disallowed costs.
- d) May result in an increased assessment/monitoring rate.
- e) May result in the requirement of additional training for the subgrantee personnel and contractors.
- f) May result in the recommendation for High Risk Status for the subgrantee.
- g) Continued Findings of this type may result in termination of DCS Weatherization Assistance Program Award to the subgrantee and/or disbarment of contractors.

Trends for Concern

1. The following criterion generally constitutes a Trend for Concern:

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a) Any other areas of noncompliance with the Mississippi Weatherization Field

Guide/Standards, Mississippi Weatherization State Plan, Standard Work Specifications (SWS) or any other guidance issued by the Division of Community Services not considered a Finding

2. An Onsite Assessments Report that contains a Trend for Concern:

- a) Requires immediate action to eliminate any future occurrences.
- b) May require corrective action to be taken if similar future situations relating to Major energy savings measures, documentation requirements, or health and safety measures are found to be repeated.
- c) May be reclassified as a Finding if repeated, that is, if similar situations are found on consecutive assessment visits.
- d) May result in the requirement of additional training for the subgrantee personnel or contractors.

TENTATIVE MONITORING SCHEDULE	
PERIOD	AGENCY
FIRST QUARTER	NORTEAST MS CS LIFT, INC.
SECOND QUARTER	WWISCAA PRAIRIE OPPORTUNITY
THIRD QUARTER	SOUTH CENTRAL MULTI-COUNTY
FOURTH QUARTER	TBA (FOLLOW-UPS)

V.8.4 Training and Technical Assistance Approach and Activities

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

T&TA funds are given directly to subgrantees to address training. Subgrantees will follow the MDHS Subgrant/Agreement Manual. Funds may be used to obtain and maintain certifications, training, training support, and providing or receiving programmatic and technical assistance. T&TA funds may also be used to train contractors participating in the program provided a retention agreement is obtained.

The MSWAP will use the following methods to provide Programmatic, Administrative, and T&TA:

- On-site visits provide an excellent opportunity to assess the technical needs of subgrantees through the notation of program deficiencies.
- DCS Weatherization Staff will provide specific T&TA on automated audit inspection procedures as a regular component of the on-site Programmatic and Management and production monitoring visits.
- DCS Weatherization staff will provide T&TA through onsite, written, and telephone communication with Subgrantee staff.
- DCS staff will provide on-site or offsite T&TA as needed. Need may be identified by the Subgrantee staff, Office of Compliance monitoring visits, DOE Project Officer monitoring visits, internal state audits, IG reports, or by DCS staff as the result of observation for resolution of problems, or to meet updates required by DOE.

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- DCS will provide Subgrantees staff programmatic training quarterly, and require subgrantees staff to participate in national activities as they become available. MSWAP will assure subgrantees staff are able to attend these meetings and will encourage subgrantees staff to take advantage of all programmatic, administrative and technical training opportunities.
- MSWAP management staff will attend DOE mandated activities/events, NASCSP events, State Weatherization Directors' meetings, national DOE sponsored conferences, and other staff development trainings as needed or required. Continuing education and conference attendance ensure Grantee effectiveness in administering and implementing the grant.
- Quarterly Weatherization Network Meetings will address areas of common concern with regard to Administrative, Programmatic, and Technical training addressing initiatives and future program requirements. *(See training schedule)*
- MSWAP will utilize the QCI on-site assessment tool to analysis deficiencies of the work performed on dwelling.
- MSWAP will utilize the results of the analysis to rate areas of deficiencies and effectiveness of subgrantee.
- Based on the ratings of deficiencies, MSWAP will develop a score card to determine training opportunities.
- Field Guides and Standards will be provided to subgrantees via the Notification of funds Availability (NOFA).
- Each Subgrantee and Subgrantee Contractor(s) will be provided T&TA to address the Field Guide and Standards.

In accordance with WPN 22-4, T&TA activities for MSWAP field staff will consist of Comprehensive or Specific training. MSWAP will collaborate with Community Housing Partners (CHP), and Everblue Weatherization Training Centers to provide training in accordance to the following:

Comprehensive Training: Occupation-specific training, which is part of an overall curriculum, aligned with the topics within the given JTA being trained. Comprehensive training must be administered by, or in cooperation with, a training program that is accredited by a DOE-accepted credentialing body for the JTA being taught.

Specific Training: Single-issue, short-term training to address technical skills or knowledge gaps. Conference trainings and any training not aligned with a Home Energy Professional JTA are included in this category.

Job Task Analyses (JTAs): JTAs define and catalogue the knowledge, skills, and abilities a practitioner needs to perform a given job effectively and safely. JTAs are used by training providers to develop coursework that can be verified and accredited by a third-party organization.

MSWAP field staff are only those technical staff members directly employed by DCS and Subgrantee agencies, such as auditors and inspectors. *Contract auditors and inspectors are not explicitly included, but may be eligible for T&TA funded training as long as a retention agreement is obtained.* T&TA funds may also be used to train contractors at the Subgrantee level participating in the WX Program. The use of T&TA funds to reimburse contractors is limited to T&TA that supports the four Home Energy Professionals occupations.

- **Retrofit Installer/Technician (RIT):** A residential energy efficiency professional who installs energy efficiency upgrades in dwelling units.
- **Crew Leader:** A Crew Leader is responsible for supervising and assisting in the retrofitting activities specified in the scope of work. The Crew Leader is responsible for quality control, interacting with the client, managing personnel and materials, and ensuring a safe and efficient job site.
- **Energy Auditor:** An experienced professional who evaluates the health and safety issues, durability, comfort, and energy use of a residential building. The Energy Auditor (EA) conducts advanced diagnostic tests, gathers and analyzes data, and creates energy models to draw conclusions and make recommendations to the client for improvements.
- **Quality Control Inspector (QCI):** A certified residential energy-efficiency expert who ensures the completion, appropriateness, and quality of energy upgrade work by conducting a methodical inspection of the building and performing safety and diagnostic tests.

In making the determination to pay for contractors training, MSWAP Subgrantees must secure a retention agreement in exchange for training. The retention agreement must require that the contractors will work in the Program for a specific amount of time, which must align with the cost of the T&TA provided.

MSWAP will ensure that each worker will be afforded the opportunity to acquire knowledge and skills needed to perform the specific job task. In addition, each Subgrantee will be required to have on staff **at least one BPI Certified Quality Control Inspector & Energy Auditor**. Subgrantees replacing or hiring new **staff** must ensure that the candidate(s) for employment be certified or have the knowledge, skills and abilities to meet the JTA's requirements for Retrofit Inspector, Energy Auditor, or QCI. All staff will be required to **secure their certification** within **Thirty-six (36) months**. Training plans will be structured in the manner best suited for each agency. Subgrantees must provide Action Plans addressing the following:

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- QCI, EA, CL and RIT- provide a plan ensuring training every three years or when needed, for maintaining certifications.
- Subgrantees must provide a plan to address New Hires according to the above criteria.
- Subgrantees must provide DCS all documentations of certifications obtain by Subgrantees WAP Staff, within thirty (30) days of completion.

Note: *It is the responsibility of the Subgrantee to ensure staff and/or subcontractors complete training. DCS will monitor Subgrantee progress and track credentials. Weatherization staff may not function unsupervised until training and certification requirements are met.*

Comprehensive training must be provided by a DOE approved accredited training program. Currently, *IREC accredited training centers are the only training centers that meet this requirement.* MSWAP training will be provided by the contracted training provider in the manner best suited for the situation. MSWAP will continue to collaborate with Community Housing Partners (CHP) and Everblue to provide Comprehensive & Specific training.

Specific training will be obtained on an as-needed basis and on a rolling basis to fulfill certification CEU requirements. Specific training is considered but not limited to single issues, short-term, *training to address acute deficiencies in the field*, concerns found during on-site reviews by DCS T&TA Staff, Office of Compliances Division of Monitoring, DOE Project Officer, and Desk reviews. In cases of on-site visits, DCS will provided technical assistance in the field.

Other required or approved training will cover topics such as Health & Safety, using the NEAT/MHEA software, creating-cost effective job work scopes, heating system diagnostics, performing post inspections, materials installation, air sealing, and pressure diagnostics. The goal of this training is also to introduce or significantly improve the knowledge and expertise of the WAP Network.

MSWAP will collaborate with CHP and Everblue to execute the following training to assure that each worker is afforded the opportunity to acquire the knowledge and skills needed to perform the specific job task: ***(All trainings will be Mandatory)***

First Quarter (July-September 2023):

Training	Comp./Spec.	Date of Training
MSWAP Network Meeting	Specific training	July TBA
ASHRAE 62.2/Zonal Diagnostics	Specific training	July TBA
Building Science Principles	Specific training	August <i>TBA</i>
Energy Auditor Course	Comprehensive	September TBA
NASCSP	Specific training	TBA

Second Quarter (October-December 2023):

Training	Comp./Spec.	Date of Training
MSWAP Network Meeting	Specific training	October TBA
Building Science Principles	Specific training	October TBA
Installation Field Mentoring	Specific training	November TBA

Third Quarter (January- March 2024)

Training	Comp./Spec.	Date of Training
MSWAP Network Meeting	Specific training	January TBA
Building Science Principles	Specific training	February TBA
QCI Process	Specific training	March TBA
QCI Certification	Comprehensive	TBA
On-site T&TA	Specific training	TBA

Fourth Quarter (April-June 2024)

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Training	Comp./Spec.	Date of Training
MSWAP Network Meeting	Specific training	April TBA
CEU sessions	Specific training	TBA
On-site T&TA	Specific training	TBA

DCS will encourage that the following Specific/Comprehensive online courses, offered by CHP be taken: (As needed)

- Lead Safe Weatherization course (LSW) if needed
- HVAC Fundamentals
- ASHRAE/ Red Calc Webinar (2hrs.)
- Retrofit Installer Technician
- Manufactured Housing Fundamentals
- Energy Auditor
- Online Math Review Course (**Free**)

Percent of overall trainings

Comprehensive Trainings:	40.0
Specific Trainings:	60.0

Breakdown of T&TA training budget

Percent of budget allocated to Auditor/QCI trainings:	65.0
Percent of budget allocated to Crew/Installer trainings:	15.0
Percent of budget allocated to Management/Financial trainings:	20.0

V.9 Energy Crisis and Disaster Plan

**State of Mississippi
Weatherization Assistance Program
Disaster Relief Plan**

For weatherization purposes, a disaster is determined by a Presidential or Governorial order declaring either a Federal or State Emergency. The crisis will generally involve three phases: the crisis itself, the clean-up, and rebuilding of the area.

Purpose: To develop a prudent disaster response plan that addresses the needs of affected low-income clients and takes into consideration the limited funding available and the effects to the weatherization program activities. The State of Mississippi will work in conjunction with its Disaster Relief Team to aid with identifying and securing any resources that may be available to assist in the relief. Project Management Center (PMC) Project Officer will be notified as soon as possible regarding a disaster.

Eligible Activities:

Reweathering – The rule allows any home damaged by a disaster to be reweatherized, without regard to date of weatherization, if the damage to materials is not covered by insurance.

Health & Safety – The rule allows a State to develop a health and safety plan to address the needs of low-income occupants of eligible homes.

Technical Assistance – The rule permits the States to use technical assistance units in flexible ways to achieve energy efficiency goals of the program.

Leveraging – The rule permits States to use a small percentage of DOE grant funds to provide leveraging opportunities at the state and local levels with prior approval.

Eligible Population: Any person or household, (*residence of Mississippi*), meeting income eligibility based on 200% of the federal poverty guidelines. Priority will be given to clients currently on the WX Priority Lists, elderly, handicapped, and families with children.

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Allowable expenditures under WAP include:

- 1) The cost of incidental repairs to a negligible dwelling unit if such repairs are necessary to make the installation of weatherization materials effective and,
- 2) The cost of eliminating health and safety hazards, elimination of which is necessary before the installation of weatherization materials (10 CFR 440.18(d)(9); 10 CFR 40.18(d) (15). 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.* The \$8,250 per dwelling unit limit continues to apply.

The State of Mississippi elects to limit incidental repairs (10 CFR 440.14(c) (6) (viii) to \$500. If total anticipated repair cost exceeds \$500 in materials expenditures, DCS must first authorize the additional expenditures before the costs are incurred. All requests must be in writing, documenting why the exception is being requested and how the repairs will benefit the effective performance or preservation of Weatherization materials.

The use of WAP funds to pay personnel to perform functions related to protecting the DOE investment. Such activities include: securing weatherization materials, tools, equipment, weatherization vehicles, or protection of local agency weatherization files, records and the like during the initial phase of the disaster response. *Using WAP funds to pay for weatherization personnel to perform relief work in the community as a result of a disaster is not allowable.*

Subgrantees may use weatherization equipment to help assist in disaster relief provided the WAP is reimbursed according to the DOE Financial Assistance Regulations 10 CFR Part 600.

Health & Safety – Subgrantees will utilize the health and safety plan to address the needs of low-income occupants of eligible homes. (See Attachment)

Technical Assistance – The rule permits the States to use technical assistance units in flexible ways to achieve energy efficiency goals of the program.

Leveraging – The rule permits States to use a small percentage of DOE grant funds to provide leveraging opportunities at the state and local levels with prior approval.

Eligible Population: Any person or household, (*residence of Mississippi*), meeting income eligibility based on 200% of the federal poverty guidelines. Priority will be given to elderly, persons with disabilities, families with children, high residential energy users, and households with high energy burdens (10CFR 440.16 (b)) However, it would be permissible to consider in households located in the disaster area, as a priority as long as the households are eligible and meet one of the priorities established in regulation and are free and clear of any insurance claim or other form of compensation resulting from damage incurred from the disaster.

Scope of Work:

1. Authorization for subgrantees to re-prioritize service requests coming from disaster areas so that eligible residents from these areas receive weatherization and re-weatherization services as quickly as possible as long as the households are determined eligible for WAP services; meet one of the priorities described in 10 CFR 440.16(b); and are free and clear of any insurance claim or other form of compensation resulting from the damage incurred from the disaster.
2. Authorization for DCS to submit an amendment to its Weatherization State Plan that reflects changes, including potential reductions in production, and the use of unspent carryover funds if

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necessary, to provide emergency services to the affected areas.

Additional Criteria:

I. First Priority

- a. Health & Safety
- b. Measures within scope of program

II. Second Priority

- a. Specific list of measures that is most beneficial for the type of disaster to include, but

not limited to:

- 1. Minor roof repair – *per WX guidelines*
- 2. Repair or Replacement of Sheet Rock
- 3. Replace hot water heaters
- 4. Replace Insulation (Walls, Attic, Crawl Space)
- 5. Replace/Repair Windows and Doors
- 6. Replace/Repair HVAC system and space heaters
- 7. Replace electrical/damaged outlets – (H&S) Work will be done on outlets that

impacts the weatherization measures.

- 8. Minor envelope repairs
- 9. All remaining measures –

- a. Installed in order of priority in accordance with State Policies and
Procedures.

- b. Subgrantees will utilize the NEAT/MHEA Audit when determining work
to be done.