

Weatherization Readiness Fund (WRF) Toolkit



Table of Contents

STENZOCO

01.

Introduction

02.

WRF Planning Guide

03.

Programmatic Administration
Considerations

04.

WRF Production

05.

Quality Control & Quality
Assurance

06.

Reporting

07.

Training

08.

Program Improvement

Appendix

Sample WRF Plans



The History of Weatherization Readiness Funds (WRF)

Deferrals in the Weatherization Assistance Program (WAP) have long been an issue resulting in clients most in need of weatherization services, unable to be served due to the condition of the home. The [Weatherization Readiness Fund \(WRF\)](#) was created through appropriation language in the FY 2022 budget to bring deferred homes into weatherization-ready status. This funding is contained within a three-year grant cycle.

DOE published *WPN 22-6: WAP WRF Guidelines* on April 4, 2022, to initiate the WRF program. The U.S. Department of Energy (DOE) revised WRF and published [WPN 23-4: WRF Expansion of Scope](#). This update allowed for WRF to be used with BIL WAP jobs, provided guidance regarding WRF jobs and their subsequent WAP (BIL or Formula) completion being completed in different program years, and clarified that unspent Weatherization Readiness Funds can be carried over into the next budget period.



WRF funds have a three-year grant cycle. PY '24 is the final year of this 3-year grant cycle; carryover into PY '25 is *NOT* allowed.

Spending 100% of these funds will help secure future funding.

WEATHERIZATION READINESS WORKING GROUP (WRWG)

NASCSP convened the Weatherization Readiness Working Group (WRWG) to provide input into the programmatic implementation of Weatherization Readiness funds.

The Weatherization Readiness Working Group consists of NASCSP members from all five regions with the following intent:

- Understand and define existing issues related to deferrals.
- Compile and assess existing data on deferrals.
- Craft language in support of Wx readiness legislation, regulation, and program guidance.
- Define an advocacy plan for WRF: encourage spend/production, WRF authorization.
- Develop resources for Grantees/Subgrantees to effectively deploy these funds.
- Determine feasibility of developing a program-wide system/methodology for deferral tracking.



The WRWG has convened monthly meetings since February 2022 and perspectives from the different regions have been valuable in gaining an understanding of the rollout of WRF and what methods can be employed for improvement.

Name	Grantee	Region
LaWanda Jones	District of Columbia	1
Geoff Wilcox	Vermont	1
Josh Larose	Vermont	1
Susan Wood	Georgia	2
Jen Bisset	Virginia	2
Katie Svoboda	Nebraska	3
Troy Cucchiara	New Mexico	3
Maddy Kamalay	Michigan	4
Mary Meunier	Wisconsin	4
Lizzie Adams	California	5
Adam Gosney	California	5
Mimi Burbage	Alaska	5



Jonathan Ballew	NASCSP	
Andrea Schroer	NASCSP	
Britt Pomush	NASCSP	

WRWG Successes

- Deliver program recommendations to Representative Paul Tonko's (NY) office regarding sponsored WAP legislation inclusive of WRF.
- Advocate for program improvements noted in WPN 23-4, namely allowing WRF completions to happen outside of the program year of the WAP completion.
- Roundtable training session at NASCSP Annual Conference in Grand Rapids, MI.
- WRF advocacy within WAP network to assist with spending and production of funds.
- Conduct a network-wide training on WRF implementation as well as SHPO and NEPA considerations.



[Presentation](#)



[Recording](#)



NASCSP

NATIONAL ASSOCIATION FOR STATE COMMUNITY SERVICES PROGRAMS

RELEVANT GUIDANCE

WPNs, Memos & Regulation

- ◆ [WPN 22-6_ARCHIVED WRF guidance](#)
- ◆ [WPN 23-4_WRF expansion of scope](#)
- ◆ [Memo 111 Data Collection Updates - REVISED](#)
- ◆ [WPN 23-2_WRF Allocations](#)
- ◆ [WPN 20-4 Monitoring instructions](#)
- ◆ [WPN 22-9 Braiding funds](#)
- ◆ [10 CFR 440 Weatherization Assistance Program Regulations](#)
- ◆ [2 CFR 440 Uniform Guidance](#)

Resources

- ◆ [Deferrals Classification Guide and Tracker](#)
- ▶ [Webinar presentation](#)
- ◆ [NASCSP website: PY '23 State Plans](#)
- ▶ Section IV.7 contains approved WRF plans
- ◆ [DOE Environmental Justice Mapping tool](#)



WRF PLANNING GUIDE

WPN 23-4 dictates that each Grantee will draft a plan to be approved by DOE. This plan will describe how these funds will be used, what measures will be allowed, household prioritization, monitoring, fund allocation, and maximum funding amount per home. The WRF Plan is submitted via Section IV.7 Miscellaneous of the Annual Plan.

The **WRF State Planning Guide** was created to assist Grantees in the development of their plans to allow for maximum flexibility and to ensure full utilization of the funds. This guide is derived from plans of the top five WRF performers from PY '22 and is inclusive of the full plans of these five Grantees.



To view other WRF plans, see section IV.7 Miscellaneous of the Grantee plans posted on the [NASCS website](#).



What is required to be included in the WRF section of the Annual State Plan? The Federal requirements are outlined in DOE [WPN 23-4](#) and [Memo 111](#) and are summarized below:

01

Develop WRF Plan

Each Grantee's WRF plan, included in Section IV.7 Miscellaneous of your Annual File, must address:

- A description of use of funds
- Household prioritization
- Funding restrictions
- Monitoring protocol
- Maximum funding amount per home. Grantee can select from the following options:
 - Average Cost per Unit (recommended)
 - Cost cap per home



02

Track Funds

Grantees have Quarterly and Annual reporting requirements

This will require Subgrantees to track production and job characteristics. This can be done using DOE's optional Deferral Tracking Tool or an existing Data Management System (DMS). At a minimum, it is recommended to review DOE's optional Deferral Tracking Tool to ensure that the necessary data points are captured.

03

Reporting

- WAP Quarterly Performance Report (DOE Form 540.3) found in the Performance and Accountability for Grants in Energy (PAGE) reporting system:
 - Number of Buildings by Housing Type
- Annual Report: T&TA, Monitoring, and Leveraging Report (DOE Form 540.4) found in PAGE.
 - Avoided deferrals/Number of units made weatherization ready
 - Year built
 - Housing type (Single Family, Multifamily, Manufactured Home)
 - WRF measures completed
 - WRF expenditure per annual formula unit and building
 - WRF expenditure per BIL unit and building
 - Leveraged funds used per unit



Per Memo 111, final approval from OMB for revised reporting metrics is pending with an anticipated start in PY '24.

The NASCSP Website houses all DOE approved PY '23 State plans [here](#). We have reviewed the plans of the top five performers from PY '22 and have noted the following best practices:



Keep It Simple

No need to overcomplicate the plan. The average length of the five plans reviewed was 567 words.



Should the Grantee use an ACPU or cost cap?

ACPU (recommended): Best practice, as it builds in flexibility. These ACPUs can absorb rather large costs due to their size. Aggregating the costs across the state also allows for less expensive jobs to help keep the ACPU low. For example:



- AK: \$16,000
- NM: \$19,000
- UT: \$20,000

Cost Cap: Not preferred, tends to be less flexible. If you must use a cost cap, build in language to allow for approvals at the Grantee office.

- KS: \$10,000, Braiding encouraged. This amount is aligned with another deferral reduction program.
- ND: \$15,000, Grantee approval required to exceed.



Build Flexibility and Consistency into your WRF Program

- Allow for Grantee approval for measures not specifically noted in the plan and/or to exceed a cost cap with state only approval.
- DOE has purposely left a lot of discretion to the Grantees in defining the bounds of their WRF program.
- Align monitoring and intake with your current process. WRF was designed to slip seamlessly into a Grantees existing intake and eligibility program. Keep existing processes the same when possible.
- Allow for reallocation of WRF funds to support production and decrease carryover. Be mindful of the time necessary in your state to revise contracts.
- Carryover between budget years is not recommended. Remember, WRF funds exist in a three-year grant package – PY '24 is the end of the grant cycle, carryover will not be allowed after PY '24.
- Consider prioritizing allocation where the need is the greatest to ensure 100% of funds are spent within each program year to avoid carryover. Allow for flexibility in determining the best and most expeditious expending of funds.
 - Some states have used a competitive process where Subgrantees with longer wait lists and greater deferral numbers would receive more of the funds.
 - Allocating in line with your formula grant process is easy, but will need to be managed and monitored closely to ensure funds are being spent in full.



Data Management

Ensure your system will give you real-time analysis of the spending of WRF funds. At a minimum, the Grantee should have a monthly snapshot of where spend and production is happening. This enables the Grantee to reallocate funds in a timely manner while considering the time required to revise contracts.





Create a Comprehensive List of Approved Measures & Allow for State Approval in Rare Cases beyond the List

Your list of approved measures might include:

- Major roof repair
- Wall repair
- Ceiling repair
- Floor repair
- Foundation or subspace repair
- Exterior drainage repairs (gutter/landscaping)
- Plumbing repairs
- Electrical repairs
- Cleanup and or remediation beyond WAP
- Lead paint/asbestos/mold and moisture remediation
- Fuel tank removal, repair, or installation
- Major repair to unsafe chimney and stacks
- Water source repair (wells/filtration system, etc.)
- Windows and doors beyond scope of health and safety
- Vermiculite abatement
- Bug/rodent/pest infestations (to include the associated biological hazard)
- Structural & nonstructural repairs
- Leveling manufactured homes



Define Process & Priority for Previously Deferred Homes

Ensure that previously deferred homes as well as current deferrals can be served simultaneously.



Rely on Municipal Inspections where Possible

If a measure requires a permit to be pulled, rely on the municipal code inspector's report. The Grantee must certify that the home is weatherization ready, not on code compliance of measures outside of the SWS.



Mirror Existing Monitoring Protocols as stated in your State Plan

In most cases this requires a Subgrantee to provide Quality Control Inspections on 100% of their jobs and Grantees to provide Quality Control Inspections on a minimum of 5% of completed units. Update existing monitoring forms to include WRF.



Create a Clear Process

Create a clear process with process mapping, flow charts, decision trees, and checklists to provide clarity into this new process. Include Subgrantees, training centers, Policy Advisory Council, and State Associations in development activities and meetings.



Be Mindful of the Intake Process

Data is necessary, be mindful of the intake process. Do not refer clients out of the program without completing data entry. This could be a full intake of the client or by using a referral form to note that there was a request for services that could not be fulfilled, and which program the client was referred. Omitting this information will create data quality issues during program evaluation, as you will not have data related to clients that were not able to be helped with WAP funds.



Expedite Expending Funds by Reviewing List of Previously Deferred Clients

To expeditiously expend funds, some States have reviewed their list of previously deferred clients to assess which clients are still eligible. This method could be used to address region specific issues, e.g., vermiculite remediation or to group together projects by geography or by type of repair necessary.



Include Photo Documentation!

It is critical that there is adequate photo documentation of the job, including photos of the original deferral issues as noted by the auditor, photos of in-progress work to remediate the issue, and photos of the resolved issue making the home weatherization ready.





Be Mindful of Deferral Issues that cannot be Resolved with WRF

It should be noted that not all issues can be resolved with WRF funds. Those issues may include:

- Threatening or abusive client behavior
- Drug use



Ultimately, the intent of WRF is to make a deferred home ready to be weatherized and help our most vulnerable clients.



PROGRAMATIC/ ADMINISTRATIVE CONSIDERATIONS



Allocation

As with the formula program, WRF affords grantees the ability to define the WRF allocation for each of the Subgrantees. In determining the allocation formula, Grantees should consider how to spend the funds effectively and efficiently. Some grantees may choose to follow the same funding allocation formula as is used for the formula. This can make the process easier, however it is recommended to assess whether a different formula could be used to ensure full utilization of the funds.

Some states used a competitive process where sub grantees can submit proposals for the weatherization readiness funds based on deferral numbers to better meet the needs and capacity of that specific Subgrantee. This allows Subgrantees to determine their ability to complete WRF jobs or for Agencies with a large deferral list to utilize more funding to alleviate the deferrals.

It may also be elected to focus WRF funds on historically disadvantaged communities in line with the justice 40 initiative. DOE has developed an [Energy Justice Map](#) and resources that can help identify disadvantaged communities and provide demographic information.

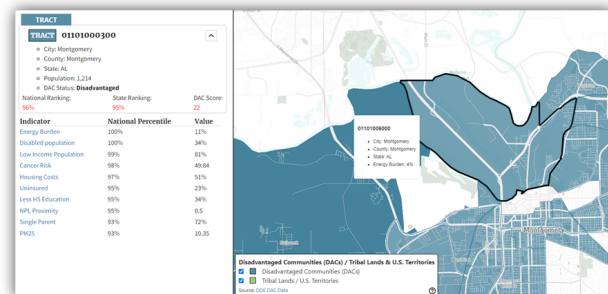


Figure 1: DOE's Energy Justice Map



Cost Limit

WPN 23-4 allows Grantees to define the cost allowability parameters. Grantees can define whether WRF jobs will have a Cost Cap or if they will be subject to an Average Cost Per Unit (ACPU) calculation. Some Grantees have opted for a Cost Cap, which is a rigid policy restricting any work past a stated dollar amount. A policy example of a Cost Cap would be, "The maximum WRF investment that may be applied to a home is \$10,000." This is easy enough to understand but may make certain measures difficult to address; the home with a \$10,001.00 WRF cost would not be able to be served! Alternatively, some Grantees opted to institute an ACPU for WRF jobs; the amount of which is defined by the Grantee. The ACPU would work in the same fashion as the formula program. This allows for the aggregation of the costs which can allow for expensive jobs to balance out smaller jobs. This flexibility allows Grantees to adopt a process that works best for them.



Eligibility

The eligibility for the weatherization readiness fund was designed to be the same as the process used for the formula WAP (200% FPL) program. You may find that some clients will have been deferred in a previous program year, in this case it would be required that those clients reapply to ensure that they are currently eligible to receive weatherization assistance program services.

Some states used a competitive process where sub grantees can submit proposals for the weatherization readiness funds based on deferral numbers to better meet the needs and capacity of that specific Subgrantee. This allows Subgrantees to determine their ability to complete WRF jobs or for Agencies with a large deferral list to utilize more funding to alleviate the deferrals.



Previously deferred units: It is recommended to cross-reference previously deferred homes in your area with your currently approved clients. These previously deferred clients remain in need of weatherization services and stand to benefit greatly from these new Weatherization Readiness Funds. Remember, had WRF been in place during the original deferral, this client would have been reaping the benefits of Wx since then.



Some states may offer additional priority points for 'high energy users' or those with 'high energy burden' (per [§ 440.16](#)).



Intake

It is important to record all information at the intake stage, even if you are not sure the client will be eligible for WAP services. At times, an intake worker may identify a more appropriate program and refer a client out of the WAP program without complete data entry at intake. This creates a lack of data which will make future program evaluation difficult. Would it be important to know how many clients requested services but were not 'weatherization ready'? Referrals are important pieces of information to track for CSBG reporting as well as program impact and opportunity for improvement.

Pre-Approval

Some states have opted to use a pre-approval process to ensure that all WRF jobs are in line with the grantees approved plan. This gives the Grantee the ability to be informed of all WRF jobs across their territory. However, this approval process could slow down production.



Other states have opted to rely on a well-defined list of approved measures where sub grantees will not be required to seek pre-approval for each WRF job. In either case it is most important to ensure a quick turnaround for approval and adequate training and resources to empower the Subgrantees to complete WRF jobs.



Utilizing Leveraged Funds

For some Grantees, WRF funds are mirroring an existing deferral reduction program funded with non-DOE funds. Other Grantees will develop and create a brand-new program. Care and planning will need to take place if your program has other (non-DOE WRF) deferral reduction funds. Among these considerations will be contract period of performance dates, rules related to a WAP completion following expenditure of WRF funds, and materials/methods prohibited by funding sources. Reporting on non-DOE leveraged funds that are supplementing WRF funds is required, which may necessitate modifications to a Grantee's Data Management System.

Referrals

For clients referred from outside of WAP, the client must apply for and be deemed eligible to receive WAP services. Keep in mind that this new client will have a priority number assigned and the WAP formula rules regarding priority of service remain in effect.



The existing methods for raising an applicant's priority status remain the same. See excerpt from [§ 440.16](#) below. Priority is given to identifying and providing weatherization assistance to:





- Elderly persons
- Persons with disabilities
- Families with children
- High residential energy users
- Households with a high energy burden



Previously Deferred Homes

WRF funds allow a Grantee to look back through previously deferred jobs to bring these homes into 'Weatherization Ready' status. Ensure that these previously deferred clients remain eligible to receive WAP assistance. This may present an opportunity to group deferral types together to make procurements easier because they are done at scale.

WAP eligibility must be recalculated if 12 months have elapsed since last approval to ensure the client remains eligible for WAP services. It may be necessary to reassess the deferral reason, as the condition may have deteriorated further requiring a more in-depth work scope. It could also be possible that the original deferral notice lacks sufficient information and/or subsequent deferral reasons. Remember, some existing deferrals may have been noted before WRF became available and sufficient detail may be lacking.

Current Deferrals

Readiness funds can be used to prevent current deferrals, as well as historic deferrals. As the auditor is creating the work scope for the WAP job, they will begin to take note of the necessary repairs needed in order to make the home weatherization ready. Circumstance may dictate whether the full energy audit will be completed at the time of WRF work scope development.



In some cases, WRF funds may reduce hazards and allow for access to subspaces such as crawlspaces and attics supporting the resulting weatherization job.



Data Management System Considerations

Is the current DMS able to complete the necessary reports to support WRF and deferrals? Will WRF require an upgrade to the data management system? If procurement will be required in the modification of the DMS, be sure to plan other programmatic improvements into the work scope. It may be necessary to use a temporary reporting system while upgrades are being made. This could be with spreadsheets, like the deferral tracking sheet developed by DOE. At a minimum, review the DOE tool for minimum data requirements.



WRF PRODUCTION

WORK SCOPE DEVELOPMENT

An important question to ask with each WRF measure: Can the work be completed by the existing contractor base or will procurement of contractors be necessary to complete the job? It is recommended to discuss WRF with your existing contractors to see which WRF measures can be completed by the existing contractor base. In addition to asking existing contractors if they can complete certain WRF measures, it is also important to understand whether this will be the best value for the program. In some cases, a specialty contractor may be less expensive and quicker. It is important to note that some of the WRF measures will be outside of the expected knowledge base of WAP auditors.

For example, an auditor will easily be able to identify whether a home is 'weatherization ready' or not, but developing a work scope to bring the home into a weatherization ready state may require additional assistance. One source of assistance will be the Authority Having Jurisdiction (AHJ) of the local building codes. The building code inspectors will be valuable in developing a work scope as well as providing QA services to comply with local building ordinances (more on that later). It is critical to have these decisions with your existing contractors and crews to gauge interest and ability. This could lead to the procurement of additional materials and equipment.

TIMELINE & PLANNING

WRF projects may have timelines that differ from WAP as new methods, technologies, materials, and contractors will be used. It will be important to communicate a realistic timeline with the client. Checklists can be helpful to align staff with new processes and ensure compliance.

WPN 23-4 allows WRF and WAP to take place in separate program years, but the WRF and Weatherization completion must take place within a reasonable timeframe as developed by the Grantee.



PROCUREMENT

Materials (for in-house crew/existing subcontractors)

- As with formula WAP, all materials used must be listed in [Appendix A to Part 440: Standards for Weatherization Materials](#). Grantees can seek a [waiver](#) to include materials that are not listed in Appendix A.

Procuring new subcontractor(s):

- Grantees must adhere to their State procurement policies as well as [§§ 200.321, 200.322, and 200.323](#)
- Subgrantees must adhere to their own procurement policies as well as [§§ 200.318 through 200.327](#).

CONSULTING SERVICES

Instances may arise where an auditor is able to deem a home not 'weatherization ready' but drafting the exact work scope to bring the home into a 'weatherization ready' status may lie beyond the auditor's skillset. For instance, if there is structural damage to a foundation wall, defining the work scope for this is outside of the knowledge base of an energy auditor. In this case, the auditor may use a consultant to assist with the work scope.

In this example, a structural engineer may be called to assist with the drafting and implementation of the work scope and possibly for Quality Assurance following the completion of the repair. It is the charge of the auditor to be able to define whether a home is weatherization ready, not to assume the role of an engineer. This cost would need to be included in the WRF job cost.



QUALITY CONTROL & QUALITY ASSURANCE



MONITORING

The inspection protocol will be defined by the Grantee in the WRF plan which may mirror the established monitoring protocol submitted in section V.8.3 of the State Plan. In most cases this requires a Subgrantee to provide Quality Control Inspections on 100% of their jobs and Grantees to provide Quality Control Inspections on a minimum of 5% of completed units. Update existing monitoring forms to include WRF.

Per [WPN 20-4](#), ‘in-progress’ inspections are “strongly encouraged.” While not outright required, in progress inspections have a number of benefits including the opportunity for the Grantee and Subgrantee to work together through the installation process. New measures will be installed and new methods will be used which can provide opportunities for joint training between Grantee and Subgrantee and help identify areas for program improvement.

IN-PROGRESS INSPECTIONS

Some WRF jobs will require permits to be pulled from the building department. This will provide a code official to approve the work in accordance with the local building code.

MUNICIPAL INSPECTIONS (PERMITTED WORK)



It would now be the responsibility of the Agency auditor/inspector to deem the building 'weatherization ready' and the normal flow of weatherization work can commence.



ROLE OF AUDITOR/QCI

It is important to note that a single critical decision will be made by the auditor/QCI in the WRF process: Is this home 'weatherization ready'? This question will be asked at the audit and following the WRF work. This is the determination that is required of the auditor/QCI. Weatherization personnel will not be required to sign off on work that is not in the SWS/State Field Guide.



REPORTING

New reporting requirements are anticipated to begin in PY '24 pending DOE's submitted Information Collection Request application to the Office of Management and Budget. [WAP Memo 111](#) outlines new data collection fields that are anticipated and advises Grantees to work toward implementation of these pending data requirements.

WAP QUARTERLY PERFORMANCE REPORT

PAGE: DOE Form 540.3

New data fields related to WRF are listed below.

- (c) Buildings by Weatherization Readiness Funds: By housing type, Grantees will report the number of units weatherized with DOE funds during the quarter that also benefited from DOE WRF.

WAP ANNUAL TRAINING, TECHNICAL ASSISTANCE, MONITORING & LEVERAGING REPORT

PAGE: DOE Form 540.4

(b) Weatherization Readiness: Grantees will report annually on the WRF activities and data specified within WPN 23-4. Grantees may use the optional WAP Deferral Tracking Spreadsheet or another report to submit this portion of the annual report. The specific metrics are:

- The number of completed buildings and units receiving WRF by housing type.
- The average age of buildings receiving WRF
- Nature of repairs needed
- DOE WRF expenditure per annual formula unit and building
- DOE WRF expenditure per BIL unit and building
- Leveraged fund expenditure per unit and building



DATA MANAGEMENT SYSTEM UPDATES

Does your existing Data Management System have the ability to capture the necessary reporting metrics laid out by DOE? Updates to computer systems can require contracting, procurement, and significant staff time. If you are in a situation where you are not able to make DMS updates to accommodate these new reporting metrics, a good place to start would be with DOE's Deferral Tracking Tool. This spreadsheet is inclusive of all the necessary data inputs and can serve as a holdover until DMS updates can take place. It is stated in Memo 111 that Grantees can use DOE funds to make updates to data systems in anticipation of the new reporting requirements.

ISSUES OR ACTIONS NEEDED	Total Occurrences		Listed as Issue 1	Listed as Issue 2	Listed as Issue 3
Non-funding-related Issues	0				
Building for sale or foreclosure	0		0	0	0
Remodeling work in process that prohibits weatherization	0		0	0	0
Health may be negatively affected by installation	0		0	0	0
Refused installation of weatherization measure	0		0	0	0
Illegal activity concerns	0		0	0	0
Threatening or uncooperative behavior	0		0	0	0
Refusal of ASHRAE 62.2	0		0	0	0
Refusal to remove unsafe combustion appliances	0		0	0	0
Potentially Treatable Issues, with Funding	0				
Roof repair needed	0		0	0	0
Wall repair needed e.g. interior or exterior	0		0	0	0
Ceiling Repair needed	0		0	0	0
Floor repair needed	0		0	0	0
Foundation or subspace repair needed	0		0	0	0
Exterior drainage repairs needed e.g. landscaping or gutters	0		0	0	0
Plumbing repair needed	0		0	0	0
Electrical repair needed	0		0	0	0
Cleanup or remediation required beyond scope of WAP	0		0	0	0
Other	0		0	0	0
Total Homes	0				
Total Deferral Issues	0				
Average Number of Issues Per Home					
UNDERLYING PROBLEMS THAT COULD BE REMEDIED WITH REPAIRS					
Mold/moisture	0				
Sewage	0				
Pest infestation	0				
Prohibits effective weatherization	0				
Prohibits effective weatherization (e.g., walls cannot support insulation without	0				
Prohibits effective weatherization (e.g., cannot insulate walls due to knob & tube	0				
Structurally unsound	0				
Safety hazard (electrical)	0				
Suspected Asbestos Containing Materials (indicate attic, walls, etc.)	0				
Lead paint	0				
Clutter restricting access to necessary areas	0				
Other (please specify)	0				

Figure 2: DOE's Deferral Tracking Tool



TRAINING

Make no mistake, it is a large mental shift to start doing measures that have been expressly prohibited in the WAP. Some Grantees and Subgrantees have been slow to start their WRF programs. It recalls the well-worn Chinese proverb, “a journey of a thousand miles begins with a single step.”



Peer Exchange

Completion of the first WRF job can be challenging but will be eased with support from neighboring Subgrantees and the Grantee. A peer exchange model can be very effective in building the confidence of Subgrantees who are not meeting production goals by sharing resources within the network such as: knowledge, tools, equipment, processes, forms, etc. In some cases, a high performing agency may go to a low performing agency to perform training or vice versa. In either case you are relying on the existing knowledge base of the network to assist other agencies in their production goals. Subgrantees may be more willing to share and learn from their peers than they might from the state office.



Technical Training

Many weatherization readiness measures will need knowledge outside of the general WAP knowledge base. For instance, you may find that a home needs structural repairs to the foundation. It's likely that a permit will need to be pulled with the Authority Having Jurisdiction (AHJ) and a municipal code inspector will need to sign off on the work that has been completed. A weatherization professional does not need to become a structural engineer, rather they only need to ensure that the home is now weatherization ready.

On the other hand, there are many WRF tasks that can be completed by the existing Agency crew or contractor. For instance, electrical repairs could be rectified by the same electrical contractor that will install a ventilation fan.





Policy

As with all policy developments communication with the network is critical. This communication should take place before, during and after this policy is communicated to the network. Agencies have the on-the-ground knowledge necessary to assist with the development of a new policy and will be impacted the most upon rollout. All parties should have a clear understanding of the policy and should never be “surprised” by a policy change. It is a strong recommendation that each Grantee hold monthly meetings with their network to discuss policy, technical, and procedural issues.



The WAP auditor/Inspector is charged with deeming a home ‘weatherization ready’ or not. Rely on code enforcement officials where possible to ‘inspect’ the WRF work.



PROGRAM IMPROVEMENT

Program evaluation is a crucial component to ensuring ongoing success in a program. WRF is new to everyone in the WAP network and we will learn lessons on how to better provide services as we gain experience in delivering WRF. Use the Annual Planning process to make updates to your WRF program to alleviate issues and support full spend-out of the annual allocation.



Stakeholder Engagement

The Weatherization Assistance Program embraces a culture of continuous improvement! Several effective strategies specific to improving WAP Grantee and Subgrantee performance can be used, such as: problem identification and root-cause analysis; administrative and contractual policy development; tracking and communicating program metrics; engaging stakeholders; utilizing training and corrective action plans; and finally, leveraging the subject matter experts in your network for peer-to-peer mentoring and exchanges.



What would success in your WRF program look like?



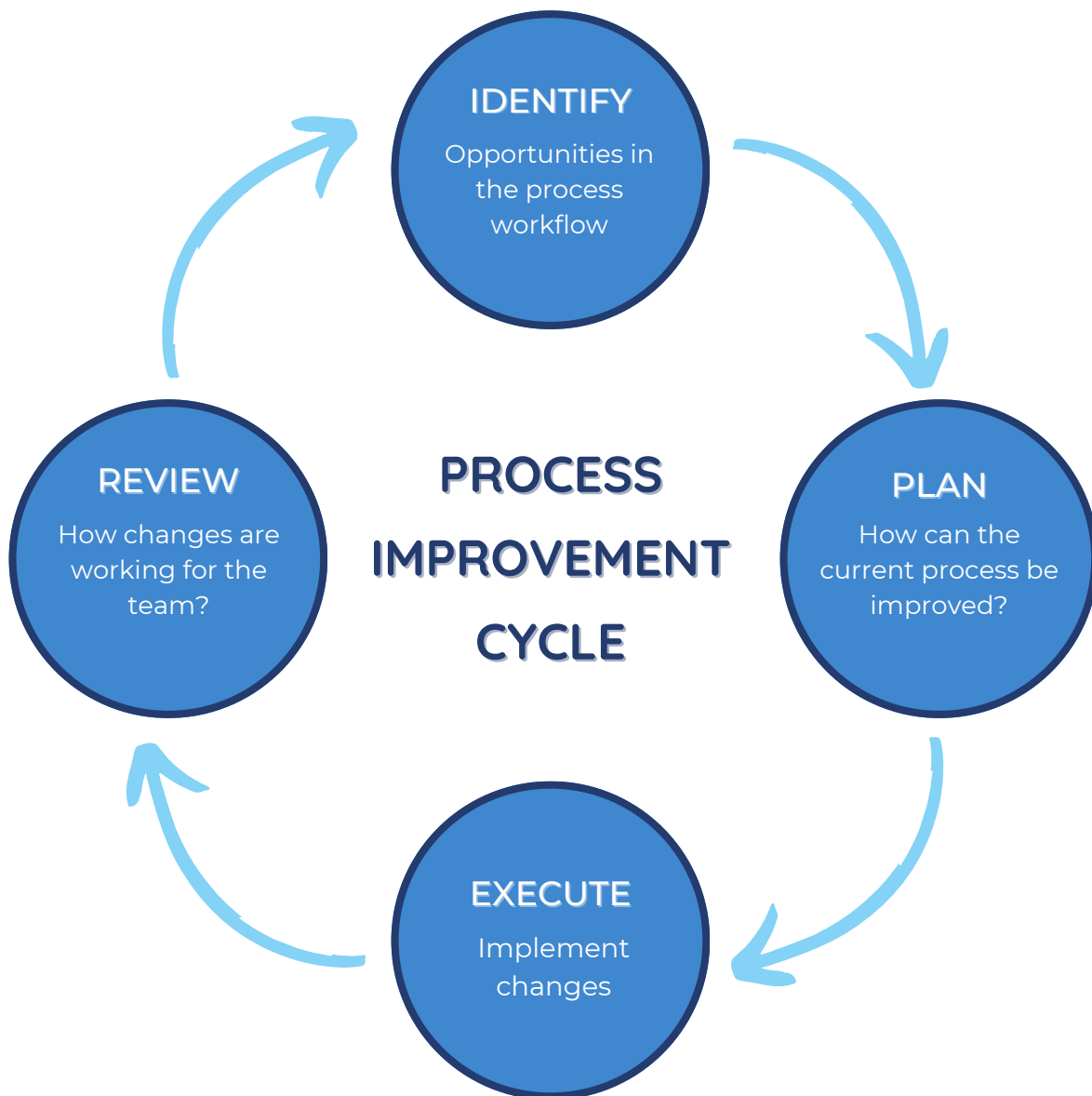
Communication

It is vital to the success of your WRF program to have frequent and respectful communication between stakeholders. The Subgrantees will need to communicate about what is working and what can be improved; policy cannot be created in a vacuum. These lines of communication must remain open and respectful. It is worth noting that the implementation of WRF is a major change to our program and many measures that are now allowable with WRF funds have been expressly prohibited from the program. It is understandable to be cautious in the use of these funds, however, the efficient spending of these funds is the best chance to ensure that these funds continue to be appropriated by congress.



Ideally, a Grantee already has scheduled meetings with the network to discuss updates and answer questions. WRF can easily be added as an agenda item to existing network meetings. This can be an ideal arena to start peer exchange discussions.

SWOT Analysis: a method for finding an organization or program's Strengths, Weaknesses, Opportunities, and Threats. A SWOT analysis could be used to determine how to improve WRF production and quality.





APPENDIX

Sample WRF Plans from High Performers in PY '22

ALASKA

THE STATE OF ALASKA WEATHERIZATION READINESS PLAN

Weatherization Readiness Funds (WRF) are designated for use by Grantees in addressing structural and health and safety issues. This funding is anticipated to reduce the frequency of deferred homes that require other services, outside the scope of weatherization, before the weatherization measures can be installed. In conversation with the subgrantees over the last two days, we have agreed upon the following plan for expending Weatherization Readiness funds.

DISTRIBUTION OF FUNDS

The Alaska allocation for Readiness funds will be divided between the three subgrantees.

AVERAGE COST PER UNIT

The average cost per unit for Readiness will be \$16,000.

MONITORING OF UNITS

Agencies will conduct 100% of inspections on Readiness units and the state will conduct 5% minimum but will try to inspect more units. We will monitor these units as we do the regular weatherization units at 5 percent minimum field monitoring. We will add a section to the QCI checklist regarding whether readiness funds were used on this home or not.

REPORTING

Currently the subgrantees keep a list of deferred clients on spreadsheets that we view at the time of Program Monitoring. Those spread sheets can be expanded to include tracking the work performed under Readiness and the overall costs and submitted quarterly to our office. AHFC could compile a list of all the units completed under Readiness and the total materials and labor costs for measures. We will also see if we can add that to our Wx. Online Reporting system as a new category.



APPENDIX

Sample WRF Plans from High Performers in PY '22

ALASKA (CONT.)

REPORTING CATEGORIES

These clients will be qualified through the regular system so any separate reporting of readiness funds will include Readiness specific data only until it can be incorporated into our regular tracking:

- Client #
- Date of Application
- Deferral problems
- Date of Remediation
- Cost of Remediation
- Other funds used

ELIGIBLE MEASURES: NATURE OF REPAIRS NEEDED WHICH PROHIBIT WEATHERIZATION

Where applicable, identify multiple repairs or remediation reasons for a single building. These are some of the eligible categories. If a repair is needed that is not on the list, please contact the State Program Manager with details and a request to proceed.

- Major Roof Repair
- Wall Repair
- Ceiling Repair
- Floor Repair
- Foundation or Subspace Repair
- Exterior Drainage Repairs (Gutter/Landscaping)
- Plumbing Repairs
- Electrical Repairs
- Cleanup and/or Remediation Beyond WAP
- Lead Paint/Asbestos/Mold and Moisture/Biologicals/Pests/Etc.
- Fuel Tank Removal, Repair, or Installation
- Major Repair to Unsafe Chimney & Stacks
- Water Source Repair (Wells/Filtration System/Etc.)
- Windows and Doors Beyond Scope of Wx H&S



APPENDIX

Sample WRF Plans from High Performers in PY '22

ALASKA (CONT.)

PROCESS

- If the subgrantee has a wait list of deferred homes in a service area, these homes should be considered immediately for Weatherization Readiness funds to get them in the cue for weatherization services. Client should be contacted and scheduled for assessment.
- Normally, deferrals are identified at the time of the assessment when someone goes to the home. For a new client that is being assessed for Wx services, if there are serious issues identified that are beyond the scope of eligible conservation and H&S recommendations utilizing the funds available, this home would be categorized as Deferred until the deficiency is corrected. These clients have been identified following the normal prioritization and wait list process so this should continue to be followed. If there are multiple deficiencies that would cause deferral, all of them must be addressed before moving the unit from deferred to the Ready Program.
- In either case the subgrantee would create a scope, contract for services or engage with a crew to do the work so that the building would then be eligible for weatherization work. Readiness work needs to be identified by measure in the client file.
- Once the Readiness work is complete, the client needs to sign off on a detailed list of the measures installed and then should be scheduled as soon as possible for weatherization services. (If this occurs during a transition between program years, that is fine just keep the information from the Readiness work in the client file moving forward.
- The subgrantee agency will then report to AHFC on a spreadsheet quarterly until we can create a category in our online data base systems. Client files for each job are expected to contain the intake, measure, cost, and inspection information for Readiness.
- WRF are allowed to be carried forward into next budget periods within the same grant cycle (e.g., Program Year (PY) 2022 can be carried into PY 2023). The use of WRF does not need to result in a DOE funded completion within the same PY but must be completed within the same grant cycle and within that program year. (In other words, if a job receives WRT funds in PY2022, it needs to receive weatherization by the end of PY 2023. This will not work when the DOE grant cycle will be ending so be aware those will not be able to be carried into a second year.



APPENDIX

Sample WRF Plans from High Performers in PY '22

ALASKA (CONT.)

BRAIDING FUNDS

With the exception of DOE WAP BIL grant funds, Alaska will try to utilize funds from other sources to augment these funds.



APPENDIX

Sample WRF Plans from High Performers in PY '22

KANSAS

WEATHERIZATION READINESS FUNDING (WRF)

WRF are designated for use in addressing structural and health and safety issues of homes that are currently in the queue to be weatherized, but at risk of deferral. This funding is specifically targeted to reduce the frequency of deferred homes that require other services, outside the scope of traditional weatherization, before the weatherization services can commence. In Kansas, WRF funds will be allocated to subrecipients using the same allocation formula that is used to determine their percentage of the grant. During the energy audit, units will be assessed for any WRF type needs. In consultation with the Subrecipients, they proposed that WRF be aligned with and follow the same rules as our other nonfederal, deferral related funding. We'll use a \$10,000 maximum cap per home for DOE WRF but it may be braided and stacked with other nonfederal funding sources to make buildings weatherization ready. WRF funds will be monitored using the same approach as outlined in section V.8.3 Monitoring Activities. WPN 23-4 allows WRF to be carried forward and utilized on WAPBIL funded weatherization projects, but Kansas will attempt to use WRF in the program year they were allocated and on annual DOE formula funded projected.

DEFERRAL TRACKING

All deferred weatherization applications and jobs, as defined in section V.1.2 below, are reported and tracked in the Hancock Management Software and the corresponding deferral reason selected from the available options. Subrecipients are encouraged to review recent deferrals as new or additional WRF and nonfederal funding becomes available to see if there are homes that could be assisted.



APPENDIX

Sample WRF Plans from High Performers in PY '22

NEW MEXICO

WEATHERIZATION READINESS FUNDING (WRF)

WRF will be used to prevent deferral of units when the work needed before a home can receive services is beyond the scope of weatherization. This falls in one or more of four categories:

- Health and Safety measures that exceed the threshold;
- Health and Safety measures that are not eligible costs under current guidance;
- Incidental Repairs that if included in the SIR calculations, would cause a unit to not be cost effective;
- Repairs not previously listed as incidental repair because of high cost or other reasons.

DISTRIBUTION OF FUNDS

Funds will be distributed to each agency using the same agency ratios as program funding. The agencies will prioritize deferred households using our ranking system described in Section V.3 of the Master File for each county. Homes that **have been previously deferred and currently meet eligibility requirements**, will receive WRF services before other homes in the same county. If one agency is unable to use the funds in a timely manner, the funds will be transferred to the other agencies that can use the funding for the intended purpose. Under no circumstances will WRF be used for other categories.

RESTRICTIONS

The following restrictions will apply to the use of WRF funding:

- All units must receive approval from MFA prior to commencement of work;
- Must only be used for homes that will receive full weatherization with the 20222025 DOE grant cycle;
- All other measures that are eligible under DOE rules are NOT eligible under WRF, unless those measures include incidental repairs that put the home below the cumulative SIR of 1. The funding is only to be used to prevent deferrals.

MONITORING

MFA will monitor the use of this funding in accordance with the regular monitoring routine. This includes desk monitoring before an invoice is paid, and QCI when a unit is selected for inspection. Agencies will include the weatherization readiness scope of work in their final QCI inspection.



APPENDIX

Sample WRF Plans from High Performers in PY '22

NEW MEXICO

MAXIMUM ACPU

Subrecipients must keep the ACPU for this category at or below \$19,000. This is kept separate from all other categorical ACPUs. There is no cap or maximum amount if the average is kept at or below \$19,000.

RESTRICTIONS

The following items are currently tracked and will continue to be tracked:

- Client Ranking
- Specific Nature of repairs
- Roof repair and replacement
- Structure repair (wall, floor, ceiling, foundation)
- Plumbing
- Electrical
- Multiple repairs
- Per unit average
- Other funds used for leverage

PROCESS

- Homes that have been previously deferred that are still eligible will be the first to receive services. For all other WRF needs, the agencies must follow the same priority and ranking used for weatherization.
- When it is identified by the agency that a home is in need of WRF, the agency must send MFA's program managers a scope of work, photos, and estimated costs of the unit. If request is reasonable, MFA issues an approval and the agency schedules the work.
- All state and local codes must be followed with required permits pulled, and final code enforcement inspections must be scheduled. Weatherization work is expected to occur as close to completion of WRF work as possible.



APPENDIX

Sample WRF Plans from High Performers in PY '22

NEW MEXICO (CONT.)

PROCESS

- Final QCI for the weatherization work includes final inspection of the WFR work. If deficiencies are present, a punch list for the contractor is generated and the contracting party does not receive final payment until the work is satisfactory. Both the client and final inspector must sign off on the scope of work for both WRF and weatherization (two signatures are required).
- Completed units are reported to MFA during invoicing. WRF is treated as a separate billing category in the agency's invoice. Units that received WRF are tracked separate with their own ACPU. MFA will include a sample of units that received WRF as part of the minimum 5% QCI.
- Units that need work that are beyond what WRF, other funding sources, and weatherization can provide will be deferred following the regular deferral policy (Section V.1.2 Master File) and tracked. The use of other funding sources is encouraged as much as possible to prevent the above situations.



APPENDIX

Sample WRF Plans from High Performers in PY '22

UTAH

Utah WAP continued to refine their Weatherization Readiness (Wx Ready) plan with stakeholders. At this time the basic outline of our policy meets all stipulations in WPN 22-6 and WPN 23-4. The criticality of ensuring that any expenditure of Wx Ready funds results in a reported completion is at the forefront of the plan. Key components of the plan are:

ALLOCATION & DISTRIBUTION

Utah WAP subgrantees will use a semi competitive process to secure Wx Ready funds for a given PY. Utah WAP desires to strike a balance between demonstrated need and equitable distribution across the network to maximize the use of these limited funds. Utah WAP subgrantees will submit proposals for the PY at the program leadership meeting that proceeds the annual Public Hearing. From the submitted proposals the Utah WAP Manager will use the following prioritization method to determine the allocation and distribution of Wx Ready Funds:

1. Agency was not funded in the prior PY to do vermiculite abatement and submitted a vermiculite abatement job for the coming PY.
2. Agency was funded for vermiculite abatement in the current PY and proposes a vermiculite abatement job for the coming PY. (Ranking of proposals would be Estimated MmBtu's Savings highest to lowest)
3. Agency proposes a non-vermiculite abatement job and the agency had success in the current PY on non-vermiculite abatement job. (Intent: when an agency is not funded due to lack of vermiculite jobs in their area yet are still active with, and successful using, Wx Ready funds for measures that are more relevant to their area's needs that they deserve prioritization.)
4. Agency proposes non-vermiculite abatement job. (Proposals would be ranked using Estimated MmBtu's Savings highest to lowest)
5. Agency proposes no jobs. State WAP determines a minimum funding that ALL non-presenting agencies are funded. (This minimum funding is not a guarantee of funding. If there are enough jobs presented that would expend all allocated funding a non-presenting agency would not be awarded Wx Ready Funds).

This process ensures that the program is prioritizing energy savings in the use of these funds while ensuring a Weatherized Unit.



APPENDIX

Sample WRF Plans from High Performers in PY '22

UTAH (CONT.)

ASSESSMENT & JUSTIFICATION

Subgrantee's will have to build a Wx Ready packet to support their use of funds. Initial assessment and justification will indicate; What is the cause of deferral? What ECM or HSM is the Deferral connected to? What is the scope of the Wx Ready work that will allow weatherization to proceed. Documentation will include photos, estimates of cost, & scope of work.

One key aspect of policy will be that no Weatherization Work is allowable until the Wx Ready activity has removed the barrier. Utah WAP sees this as a safeguard to expending funds that result in no completion. If the cause of Deferral arises during Weatherization work will be halted and the Wx Ready policy will kick in.

COST CONTROLS

Utah WAP has elected to use a Wx Ready ACPU of \$20,000 and will use the existing H&S ACPU (Section E3.1.a. of the Utah WAP Guidelines) as a per measure cost control for Wx Ready work. For PY23, this is \$3,132. The exceptions will be asbestos abatement which is a per measure cost control of \$14,000. Utah WAP will use the existing Case-by-Case Approval process in the H&S Plan to allow agencies to submit for exceptions to the per measure cost control.

ALLOWABLE WORK

Utah WAP has reviewed our existing Deferral Log and while stakeholder input is still in progress we currently see the major categories below as allowable:

- Vermiculite abatement
- Plumbing repairs
- Electrical repairs
- Bug/Rodent Infestations (to include the associated biological hazard)
- Structural & nonstructural repairs
- Removal of trash/debris
- Mold removal that exceeds the current Utah WAP H&S plan cost controls.



APPENDIX

Sample WRF Plans from High Performers in PY '22

UTAH (CONT.)

NON-ALLOWABLE WORK

Utah WAP has determined that the items listed below that have been historical deferral issues for the program are Non-Allowable Work.

- Biological hazard abatement
- Mold abatement
- Hostile client
- Drug usage or cultivation

QUALITY CONTROL

Utah WAP is taking a 2-step approach on Quality Control. First, the Agency Coordinator will be required to sign off on the authorization to initiate the Wx Ready work. This should ensure that it is sufficiently scoped, properly budgeted and tied to an ECM. Second, Utah WAP will require a certified QCI to sign off using the Scope of Work as the project standard, once the Wx Ready work is completed. Since they are already charged with holding the program to standard it is a logical extension of their responsibilities.

QUALITY ASSURANCE

Utah WAP will include the Wx Ready work in the monitoring sample. Work will be monitored to existing standards of the program.



APPENDIX

Sample WRF Plans from High Performers in PY '22

NORTH DAKOTA

Division of Community Services (DCS) will contract out the administration of the Weatherization Readiness Funds to the Community Action Partnership of North Dakota (CAPND). CAPND will be allowed to use up to 15% (\$47,567) of the funds for administrative costs. The subgrantees will submit job proposals to DCS where the State Manager will approve them. When the work is complete the subgrantees will submit invoices to CAPND for reimbursement. The WRF will use the same priority system as the regular Weatherization grant. WRF will not be used on rentals.

There is a \$15,000 cap on WRF that can be used on a project although an agency may apply for a waiver if they feel it is warranted. If WRF are used on a house, that house must be weatherized using PY2023 or 2022 BIL funds. Other funds may be used to leverage the WRF but not DOE regular program funds. All information will be tracked in our WxPro Audit and Reporting Tool. The date of deferral will be entered and the job will be removed from the deferral list when the WRF work is approved. All required information in Memorandum 103 will be tracked for reporting purposes. WPN 23-4 will be followed.

Some examples of allowable activities:

- Major 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
- Leveling manufactured homes
- Cleanup or remediation beyond typical scope of WAP
- Lead paint
- Asbestos (confirmed or suspected, including vermiculite)
- Mold and/or moisture

ACKNOWLEDGEMENTS

NASCSP wishes to extend special thanks to the WRWG for their contributions to this toolkit.

NASCSP's Executive Leadership

Beverly Buchanan, President, *AR*

Melanie Sanford, Vice President, *MI*

Matt Fitzgerald, Secretary, *VA*

Adrian Angel, Treasurer, *IL*

Leslie Taylor, CSBG Program Chair, *CA*

Jeff Heino, WAP Program Chair, *WI*

Cheryl Williams, Executive Director

CONTACT

NASCSP

111 K St NE, Suite 300
Washington, D.C.
20002

www.nascsp.org
@NASCSP

(202) 370-3657

