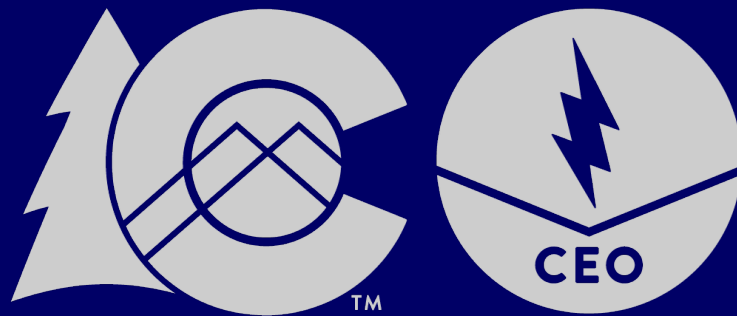


Colorado Energy Office Weatherization Assistance Program

Policy Binder Program Year 2025



CO L O R A D O

Energy Office

Weatherization Assistance Program

1600 Broadway, Suite 1960, Denver, CO, 80202

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Weatherization Assistance Program

CEO-WAP-101 Funding Allocation

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [603](#); [10 CFR 440.10](#)

1. Abstract

1.1 This policy serves as an introduction to Colorado Energy Office (CEO) Weatherization Assistance Program (WAP). This policy specifically outlines how the program uses an allocation formula to distribute program funds amongst subgrantees.

2. Allocation of Funds

2.1 DOE Funds: Regular Formula

2.1.1 The centrally heated multifamily subgrantee(s) will receive appropriated DOE funds based on their planned production for the appropriate contract performance period.

2.1.2 The single family subgrantee(s) will receive appropriated DOE funds resulting from the application of the Allocation Formula to newly appropriated DOE funds.

2.1.3 CEO WAP staff may change the above allocation methodology based on program needs and requirements.

2.1.4 FY25 Average Cost per Unit (ACPU): \$8,497

2.2 DOE Funds: BIL (Bipartisan Infrastructure Law)

2.2.1 Funds will be similarly allocated as the regular DOE allocation.

2.2.2 Per [WPN BIL-5](#), the ACPU will be updated annually for DOE BIL; the ACPU for BIL is decided over the lifetime of funds spent, not a twelve month period.

2.2.3 The DOE BIL ACPU for FY25 is \$8,252.

2.2.4 Funds will not be allocated for multifamily projects with 5 or more units.

2.3 LEAP Funds

2.3.1 The centrally heated multifamily subgrantee(s) will receive appropriated LEAP funds based on their planned production for the appropriate contract performance period.

2.3.2 The single family subgrantee(s) will receive appropriated LEAP funds resulting from the Allocation Formula. CEO WAP staff may change the above allocation methodology based on program needs and requirements.



2.4 All Other Funds

2.4.1 CEO WAP staff will determine the allocation of other program funds based on the non-Federal allocation formula and availability of units in IOU territory. Other funding sources include, but are not not limited to:

2.4.1.1 Energy Assistance System Benefit Charge (EASBC), otherwise known as HB-1105

2.4.1.2 CEO Weatherization Funds (CEO Wx)

2.5 Federal Allocation Formula

2.5.1 Used for PY25, the allocation formula was weighted based on the following values:

2.5.1.1 Low-income population (single family households below 60% SMI)

2.5.1.2 Heating degree days (HDD) and Cooling degree days (CDD)

2.5.1.3 Rural factor - low population density

2.5.1.4 [EnviroScreen score \(CDPHE\)](#)

2.6 Non-Federal Allocation Formula

2.6.1 Used for PY25, the allocation formula was weighted based on the following values:

2.6.1.1 Low-income gap population (single family households between 60% SMI and 80% AMI)

2.6.1.2 Linguistically isolated populations

3. Funding Modifications

3.1 CEO WAP reserves the right to modify the subgrantee allocation based on the funding received (federal and non-federal) as necessary.

4. Performance Indicators

4.1 If CEO WAP, or subgrantee, determines that the subgrantee will be unable to meet the contracted unit production goal, or is unable to spend at least 95 percent of awarded funds, CEO WAP may reallocate funds.

4.1.1 Reallocated funds will be distributed to other subgrantees so as to direct available resources toward the greatest overall benefit.

4.2 When any subgrantee is incapable of spending at least 95 percent of its awarded budget, it may impact the subgrantee's standing.



CEO-WAP-102 Contracts

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [103](#), [202](#), [204](#), [205](#), [501](#), [603](#); [10 CFR 440.15](#)

1. Abstract

- 1.1 This policy describes the contract requirements and the contracting process between Colorado Energy Office Weatherization Assistance Program (CEO WAP) and weatherization subgrantees and applicants.
- 1.2 Included in this policy is information on the Request For Application (RFA) process.

2. Contract Overview

- 2.1 CEO WAP contracts with subgrantees on an annual “program year” basis, running from July 1 through June 30; this timeframe is also referred to as the contract’s performance period.
 - 2.1.1 Performance period extensions beyond June 30 will be made at the discretion of CEO.
- 2.2 All work described and funded by a contract must be performed during the performance period; no materials, nor contractor expenses may be incurred for any units completed outside of the current program year.
 - 2.2.1 There are additional contract terms that are not related to CEO WAP policies.
- 2.3 **Contracted Goals**
 - 2.3.1 Each contract contains production and expenditure goals; failure will result in appropriate corrective action taken by the CEO WAP Leadership.
 - 2.3.2 Budget: Each subgrantee receives a certain budget which cannot be exceeded and is expected to be fully spent during each program year. The amount of this budget for each subgrantee is based on the total funding levels and allocation formula. See CEO-WAP-101.
 - 2.3.2.1 If CEO WAP, or subgrantee, determines that the subgrantee will be unable to meet the contracted unit production goal, or is unable to spend at least 95 percent of awarded funds, CEO WAP may reallocate funds.
 - 2.3.2.2 Consistent failure to meet goals and/or the need for the reallocation of funds may affect subgrantee standing as determined by CEO WAP on a case by case basis..



- 2.3.3 Production: Each subgrantee is required to complete a certain number of units during a program year.
 - 2.3.3.1 For each subgrantee, this production level is determined by dividing its Operations and Admin budget by its Per Unit Average (PUA).
- 2.3.4 For single family units, production goals are further separated into county-level goals for each subgrantee based on WAP eligible households in each county.
 - 2.3.4.1.1. A subgrantee's failure to exceed 90 percent of production will, at a minimum, may result in the subgrantee returning excess funds to CEO WAP.
 - 2.3.4.1.2. This will occur at the rate of the production shortfall multiplied by the subgrantee's contracted PUA.
- 2.4 Contracting Components: The contract process involves the following components:**
 - 2.4.1 Within the RFA Process, per federal regulations, contract preference may be given to incumbent subgrantees.
 - 2.4.2 Contract negotiation will be completed between subgrantee representatives and CEO WAP and support staff.
 - 2.4.3 Supplementary documents will be submitted to CEO WAP which may include, but are not limited to, the Budget Support Sheet, Starting Budget Breakout, and the Advance Form.
 - 2.4.4 Contract execution commences on July 1 of a given program year.
 - 2.4.4.1 CEO WAP may choose to renew contracts annually for up to four years following a new contract. (One year contract with up to four renewal periods for a potential total of up to five years.)
- 3. Request For Application**
 - 3.1 The RFA will be conducted in accordance with the requirements set forth in 10 CFR 440.15.
 - 3.2 CEO WAP may initiate a Request for Application (RFA) on an annual basis.
 - 3.2.1 A request open to all public or private nonprofit entities, including local units of government and councils of government, qualified to serve the low income clients, in the service area as described in the RFA. See CEO-WAP-603.
 - 3.2.2 CEO WAP defines the proposal submitted as the proposer's application for funding.
 - 3.2.2.1 The maximum allocation is predetermined by CEO WAP and is not open to negotiation.



3.2.2.2 After approval by CEO WAP, the proposal is recognized as part of the Cooperative Agreement between the state and the proposer. See CEO-WAP-101.

3.3 Schedule for RFAs

3.3.1 RFA schedules will be determined on a program year basis in conjunction with the formal release of the request for application.

3.3.2 A RFA process will occur at least once every five program years.

3.4 The Budget Support Sheet (BSS) is a spreadsheet tool used to estimate budget expenditures and determine production.

3.4.1 Each subgrantee is required to submit a BSS with their grant application.

4. Contract Amendments

Subgrantees are permitted to modify cost allocations for each subcategory during the amendment process provided the following conditions are met:

4.1 Subgrantees must submit a modified budget request to the Senior Program Manager, Senior Contact Manager, or other CEO staff as directed, based on the new or modified budget totals for each funding source.

4.2 In the event that a subgrantee has fully spent the budgeted amount in a specific funding source, the subgrantee is permitted to work with CEO WAP to modify and/or change cost allocations.

4.3 Modifications within the Administrative, T&TA, and Leveraging categories are allowed, provided these modifications do not violate the budgetary caps or rules applicable to each funding source.

4.4 Expenditures which deviate from the amounts set forth in the adjusted budget associated with the contract, without prior approval from CEO WAP, may be classified as disallowable costs and will be addressed as such.

5. **Subgrantee Standing Determination: See CEO WAP 603**

6. **For Closeout for Termination of Contracts: See CEO WAP 103**



CEO-WAP-103 Closeout Requirements

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [903](#), [103](#): [A1](#), [A2a](#), [A2b](#); [WPN 11-3](#), [WPN 21-4](#)

1. Abstract

- 1.1 Colorado Energy Office Weatherization Assistance Program (CEO WAP) contracts with its subgrantees on an annual program year basis; July 1 through June 30.
- 1.2 Subgrantees must close out the previous program year within 90 days of the new program year.

2. Closeout Requirements

- 2.1 A CEO Program Manager will communicate with subgrantees regarding the deadline for receiving closeout documents.
- 2.2 It is the policy of CEO WAP that a grant with the subgrantee will be formally considered closed after the following items are completed:
 - 2.2.1 All Program Year (PY) data is correctly entered into the CEO WAP database.
 - 2.2.2 All invoices are reconciled with the CEO accounting system.
 - 2.2.3 A resolution of all outstanding CEO WAP QA corrective actions during the program year is completed and documented.
 - 2.2.4 A reconciliation of any material expenditures during the PY, including backup documentation is completed.
 - 2.2.4.1 If the invoiced and Salesforce material totals have a difference above or below 2% of materials and supplies, documentation is needed. See CEO-WAP-103 A2.
 - 2.2.5 A summary of all Call Back and Go Back work conducted using the current program year is submitted.
 - 2.2.5.1 DOE funding cannot be used for any Call Backs or Go Backs.
 - 2.2.5.2 This will reconcile with the CEO WAP database. See CEO-WAP-903 & WPN 11-3 & 21-4.
 - 2.2.6 A summary of contributions, (e.g., landlord contributions), that have been used to pay for materials is provided to a CEO WAP Program Manager.
 - 2.2.7 A fiscal and compliance audit, covering the entire grant period is submitted to, and is then reviewed by, CEO WAP and any questions/issues raised are resolved.
 - 2.2.8 As a subgrantee's fiscal year (FY) may differ from the WAP program year an audit may be submitted covering part of the program year as



long as this schedule is maintained and there are no gaps in audit periods.

- 2.2.8.1 This means an audit for a calendar year may be submitted for program year closeout, as long as an audit for the following calendar year is submitted for the next program year closeout.
 - 2.2.9 For subgrantees who do not own their inventory, documentation of remaining inventory, by type, quantity, and value, is submitted to CEO WAP with the accompanying documentation of inventory waste.
 - 2.2.10 A summary of costs is submitted to CEO WAP for the use of WAP vehicles and capital equipment used for non-CEO WAP work.
 - 2.2.10.1 This will include the total dollar amount credited to the grant for the program year, itemized on a per job basis.
 - 2.2.11 Any weatherization funds in the possession of the subgrantee which have not been expended are returned to CEO WAP, including funds associated with contracted solar PV installations.
 - 2.2.11.1 If contracted solar installations are not completed by the close of the contract, the subgrantee must credit the grant for each system or kilowatt not installed, depending on the contract terms.
 - 2.2.11.2 The credit amount will be based on the contracted amount and/or determined by a Program Manager.
 - 2.2.12 A list of completed solar units is submitted that includes utility name and identification number, client name, full address, county, date of installation, kilowatt size installed, and the cost of installation.
 - 2.2.12.1 A completed solar unit is a unit which has been fully installed, but does not necessarily have complete interconnection with the utility.
 - 2.3 A subgrantee's program year is considered "Closed out" once the Closeout Cover Sheet is completed by a CEO WAP Program Manager.
- 3. Closeout Upon Termination of Partnership**
- 3.1 Written notification will be sent to the subgrantee including the effective date of partnership termination.
 - 3.2 A complete inventory of all tools, materials, equipment, and capital equipment purchased with CEO WAP funding will be conducted.
 - 3.3 All grant purchased items (capital equipment, computers, tools, inventory, etc.) will be removed from the premises by CEO staff.
 - 3.4 Closeout procedures will be completed.
 - 3.5 All other actions will be determined by the CEO Weatherization Assistance Program Director.



CEO-WAP-201

Allowable Expenditures

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [102](#), [103](#), [205](#), [304](#), [502](#), [503](#), [505](#), [609](#), [801](#), [201 A2](#);
[10 CFR 440.14](#), [10 CFR 440.18](#), [10 CFR 440.23](#), [2 CFR 200](#); [WPN 22-1](#), [WPN 22-7](#)

1. Abstract

1.1 This policy describes what subgrantee expenditures are allowable and able to be charged to Colorado Energy Office Weatherization Assistance Program (CEO WAP).

2. Regulations

2.1 All expenditures, in order to be allowable, must be reasonable and appropriate, and in compliance with federal and state regulations.

2.2 Federal Regulations

2.2.1 Regulations establishing the general parameters of allowable expenditures are set forth in 10 CFR 440.18.

2.2.2 Subgrantees must operate in a manner that meets or exceeds the minimum requirements set forth in 2 CFR 200.

2.3 State Contracts

2.3.1 Subgrantee expenditures are to be billed to CEO WAP on a monthly basis.

2.3.2 No materials, nor contractor expenses, may be incurred for any units completed outside of the performance period of the contract. See CEO-WAP-102.

3. Allowable expenditures

3.1 Expenditures are contingent upon the subgrantee achieving production and expenditure goals as set forth in the contract.

3.1.1 Non-attainment of these goals may result in the determination of some expenditures incurred by the subgrantee as disallowed.

3.1.2 Verification of compliance is a prerequisite to the State entering into a contract with the subgrantee.

3.1.2.1 CEO WAP reserves the right to establish additional requirements, in line with federal and state regulations, when specific situations merit such requirements.



- 3.2 The subgrantee approving the application for eligibility has the responsibility and liability for costs incurred in serving ineligible units. See 2 CFR 200.333-.337.
4. **Braiding of Funding Sources**
 - 4.1 The braiding of funds is defined by DOE as “the use of multiple separate funding sources on one weatherization project to address the different needs within the home, while ensuring each funding source is isolated and tracked independently.”
 - 4.2 Braiding is only permitted at the job level.
 - 4.2.1 Measures may never be braided.
 - 4.3 The braiding of funds is strongly encouraged, and may be required per instruction from CEO WAP, between federal and state funding sources.
 - 4.4 Braiding of funds should occur in the following instances:
 - 4.4.1 On a job with high cost measures
 - 4.4.2 Where the client and unit are eligible for all funding sources being used
 - 4.4.3 The funding sources are permitted to be used on the same job.
 - 4.4.3.1 See CEO-WAP-201 A2.
 - 4.5 Heating Systems and Braiding
 - 4.5.1 Existing non-condensing heating systems may be replaced with condensing, high efficiency heating systems with non-DOE funds in specific circumstances. See CEO WAP 801.6.2.
5. **Procurement Guidelines**
 - 5.1.1 Expenditures must also be based upon acceptable subgrantee procurement procedures and demonstrate a cost-effective approach in order to be classified as allowable.
 - 5.1.1.1 Expenditures not meeting these criteria are subject to disallowance. See CEO-WAP-205.
6. **Budget Categories**
 - 6.1 Allowable expenditures of CEO WAP funds must correspond to an approved budget and conform to the definitions of allowable expenditures for each budget category.
 - 6.2 The following information provides guidance on the types of expenditures allowable under each budget category.
 - 6.2.1 The spending caps for budget categories vary by funding source and must be followed.
 - 6.3 **Administrative/Indirect**
 - 6.3.1 Expenditures made to support the functions concerning the general organizational processes and operations of the subgrantee. Allowable expenditures include:



- 6.3.1.1 Salary and fringe benefits of WAP leadership at each subgrantee when carrying out functions concerning general organizational processes.
 - 6.3.1.1.1. This staff may also bill hours to operating expenditures if they are performing tasks specific to WAP.
- 6.3.1.2 Salaries and fringe benefits of administrative assistants, accountants, fiscal, and other administrative staff associated with the general organizational processes.
 - 6.3.1.2.1. Activities specifically defined under Operations expenditures, should not be included in administrative labor costs.
- 6.3.2 Activities associated with maintaining and sustaining the organization within which the Weatherization program is located. Examples include:
 - 6.3.2.1 Internal organizational planning and development.
 - 6.3.2.2 Board/governance related activities.
 - 6.3.2.3 Accounting, payroll, and other financial management activities.
 - 6.3.2.4 Developing and implementing internal Policies and Procedures.
- 6.3.3 Telephone expenditures, including long distance charges, incurred by CEO WAP when not directly attributable to allowable functions under Operations.
- 6.3.4 Cost for office materials and supplies not directly related to allowable functions under Operations or Field expenditures.
- 6.3.5 Those expenditures directly associated with CEO WAP that are not covered under defined categories.
- 6.3.6 Indirect cost rate. If the agency gathers indirect, those costs will be reimbursed through the administrative budget line item. Indirect costs are those that have been incurred for common or joint objectives and cannot be readily identified with a particular final cost objective or grant account. Indirect costs are billed in the administrative column.
 - 6.3.6.1 CEO WAP requires all indirect rates to comply with generally accepted accounting principles and be fully supported by actual cost data.
 - 6.3.6.2 Subgrantee must provide CEO WAP with the indirect cost allocation plan whenever updated.
 - 6.3.6.3 Subgrantees may elect to charge the de minimis rate of modified total direct costs as defined at 2 CFR 200.414 or,



if the subgrantee has a federally negotiated rate, they must use that rate.

- 6.3.6.3.1. If the subgrantee is using a federally or state negotiated rate, the agreement letter must be submitted to CEO WAP whenever updated by the federal agency.
- 6.3.6.3.2. CEO WAP is not required to honor indirect rates that have been negotiated with other state agencies. An entity must submit their state negotiated rate for review and CEO WAP will decide on a case-by-case basis to approve.

6.4 Operations

- 6.4.1 Expenditures made to improve the energy efficiency in clients' homes.
- 6.4.2 Allowable expenditures include:
 - 6.4.2.1 Payments to engage contractors to install weatherization measures in accordance with CEO WAP policies) or perform energy conservation services.
 - 6.4.2.2 Salaries and fringe benefits of weatherization personnel, including client services and field staff.
 - 6.4.2.3 Materials associated with allowable weatherization activities and related repairs for energy conservation in eligible homes. See Appendix A of 10 CFR 440. Materials expenditures may include, but are not limited to:
 - 6.4.2.3.1. Expenditures to purchase and deliver materials to the subgrantee storage site.
 - 6.4.2.3.2. The labor involved in the manufacturing of materials.
- 6.4.3 Tools, equipment, and miscellaneous field related expenses, such as the purchase and maintenance of tools and equipment, the leasing of tools, equipment, and vehicles used for field activities; protective clothing and equipment for worker health and safety, and building permits.
- 6.4.4 Rent for office space used in operating CEO WAP. Rent for office space that is used solely by WAP staff. Rent for office space used by programs outside of WAP should be expensed under Administrative.
- 6.4.5 Rent for field operations space, such as, warehouse space, inventory storage space, and vehicle parking.



- 6.4.6 Travel expenses for lodging, per diem, or other allowable expenditures associated with travel on the job that are not covered under other defined categories.
- 6.4.7 Vehicle cost including maintenance, operation, and insurance for vehicles used to transport field crews, supervisors, energy auditors, and inspectors to the job site, and for vehicles used to transport materials.
- 6.4.8 Other allowable operations expenditures (when associated directly with supporting the delivery of services to clients):
 - 6.4.8.1 Utilities used for WAP dedicated buildings
 - 6.4.8.2 Telephones
 - 6.4.8.3 Cell phones/Internet charges
 - 6.4.8.4 Postage
 - 6.4.8.5 Dues/Membership
 - 6.4.8.6 Printing/Reproduction
 - 6.4.8.7 Advertising/Publicity
 - 6.4.8.8 Supplies
 - 6.4.8.9 Reference Books and Subscriptions
 - 6.4.8.10 Vehicles used to transport personnel to jobs
 - 6.4.8.11 Office equipment maintenance
 - 6.4.8.12 All other expenditures directly related to CEO WAP functions carried out at the organization's office.

6.5 Health and Safety

- 6.5.1 Expenditures made to improve the health, safety, and environmental quality in clients' homes.
- 6.5.2 Allowable expenditures include:
 - 6.5.2.1 Payments to engage contractors to install Health and Safety (H&S) materials or services.
 - 6.5.2.2 In house labor associated with resolving health and safety issues, encountered during the course of weatherization, in accordance with CEO WAP Health and Safety Plan and CEO WAP Field Guide.
 - 6.5.2.3 Materials associated with resolving health and safety issues encountered during the course of weatherization, in accordance with CEO WAP Health and Safety Plan guidance found in the CEO WAP Field Guide.
- 6.5.3 Health and Safety budget allocation:
 - 6.5.3.1 DOE Formula: up to 20% of Operations budget
 - 6.5.3.2 DOE BIL: up to 20% of Operations budget
 - 6.5.3.3 LEAP: up to 35% of Operations budget



6.5.3.4 HB-1105: up to 35% of Operations budget

6.5.3.5 CEO-Wx: up to 35% of Operations budget

6.6 Liability Insurance

6.6.1 Personal injury, property damage, and pollution occurrence insurance for weatherization services.

6.6.1.1 This insurance will cover any damage or injury to a unit, or individual within that unit, caused by an employee of the subgrantee, while that employee is performing intake functions, auditing, inspecting, or installing materials.

6.6.1.2 There must additionally be liability insurance for the staff and Program Manager.

6.6.1.2.1. NOTE: The State of Colorado needs to be named as “Additional Insured” in the endorsement section of the certificate to include General Liability (e.g. CEO is named as additional insured for general liability).

6.7 Audit

6.7.1 An annual financial and a single audit must be performed, as required by Audit Requirements for Federal Awards - 2 CFR 200, Subpart F Audit Requirements.

6.7.2 The amount budgeted is to be the proportionate share of the subgrantee’s overall audit which is applicable to the weatherization activities.

6.7.2.1 The subgrantee shall be responsible for arranging an independent audit.

6.7.2.2 One copy of the annual audit and single audit, as applicable, are to be sent to CEO WAP within 30 days of audit completion. See CEO-WAP-103.

6.8 Capital Equipment

6.8.1 Purchases of articles of tangible, non-expendable, property or equipment that have a useful life of more than one year and an acquisition cost of \$5,000 or more.

6.8.2 Any purchase of capital equipment, including vehicles, must be referred to CEO WAP for prior approval. See CEO-WAP-205.

6.9 Leveraging

6.9.1 Leveraging funds will be distributed via the CEO WAP allocation formula and provided via the budgeting process.

6.9.2 Funds used for leveraging should result in receiving resources that will be used to expand energy efficiency, renewable energy, or health and safety services.



- 6.9.3 The leveraged resources must be accounted for separately from any CEO WAP contracted resources or funds.
- 6.9.4 There is no requirement as to whether leveraged resources need to be utilized before, after, or in parallel with other CEO WAP contracted resources or funds.
- 6.9.5 Landlord contributions are not considered leveraged resources. See CEO WAP 402.
- 6.9.6 Internal Controls
 - 6.9.6.1 A leveraging plan and internal controls should be in place at the subgrantee level, which should be regularly reviewed and updated as appropriate, prior to spending leveraging funds.
- 6.9.7 Allowable Activities
 - 6.9.7.1 Personnel labor.
 - 6.9.7.2 Consulting services.
 - 6.9.7.3 Preparing technical materials/briefs.
 - 6.9.7.4 Holding leveraging meetings.
 - 6.9.7.5 Facilitating voluntary match funds from entities.
- 6.9.8 Recommendations include:
 - 6.9.8.1 Personnel, salary, percent full time equivalent (FTE), duties, and activities.
 - 6.9.8.2 Budget and cost forecasting.
 - 6.9.8.3 Quarterly and annual leveraged resources goals.
 - 6.9.8.4 Return on investment (ROI) tracking for leveraged resources and/or in-kind contributions.
 - 6.9.8.5 A running list of potential sources and partners.
 - 6.9.8.6 Strategy for achieving stated goals with timelines.
 - 6.9.8.7 Financial management plan for assurance on separate account creation, tracking, allocation, and reporting.
- 6.9.9 Right to Review and Rescind
 - 6.9.9.1 CEO WAP reserves the right to request and review information regarding leveraging at any time.
 - 6.9.9.2 CEO WAP reserves the right to rescind leveraging funds at any time if a justifiable cause is warranted.
- 6.10 Weatherization Readiness Funds (WRF)**
 - 6.10.1 All single family subgrantees will receive Weatherization Readiness Funds (WRF) from:
 - 6.10.1.1 The Department of Energy (DOE)
 - 6.10.1.2 Low Income Home Energy Assistance Program (LIHEAP/LEAP)



- 6.10.2 WRF are to be used only in situations where the entire unit would otherwise be deferred. See CEO-WAP-403.
- 6.10.3 DOE WRF may be used on DOE Formula or DOE BIL jobs and may be leveraged with other WAP and subgrantee funds. See CEO WAP 201 A2.
- 6.10.4 LEAP WRF may be used along with DOE WRF, as long as there are DOE and LEAP funds on the job. See CEO WAP 201 A2.

6.11 Training and Technical Assistance

- 6.11.1 Expenditures to support subgrantee training and program improvement. Allowable expenditures include:
 - 6.11.1.1 Labor expenditures associated with providing Training and Technical (T&TA) Assistance to subgrantee personnel, subcontractors, and/or board members for the improved efficiency and quality of the weatherization program.
 - 6.11.1.2 Providing information concerning energy conservation practices to weatherization clients. See CEO-WAP-304.
 - 6.11.1.3 Planning of innovative pilot projects. See CEO-WAP-503.
 - 6.11.1.4 Advanced technology intended to improve efficiency and/or effectiveness of weatherization.
 - 6.11.1.5 Educational materials and industry publications for the purpose of performing the functions described in Section CEO-WAP-201.
 - 6.11.1.6 Health & Safety training for all weatherization personnel as well as client education are to be funded through T&TA funds.
 - 6.11.1.6.1. This education is not permitted as a H&S expenditure. See WPN 22-7
 - 6.11.1.7 Registration, travel, and per diem expenditures of subgrantee personnel participation in conferences related to weatherization.
 - 6.11.1.8 Labor expenditures associated with time that a designated subgrantee trainer spends receiving training.
 - 6.11.1.9 Tuition expenditures of subcontractors provided the criteria outlined in CEO-WAP-609.

6.12 Travel Reimbursement

- 6.12.1 Subgrantee travel costs incurred as part of CEO WAP are to be handled in accordance with the pertinent federal and state regulations which govern allowability and allocability.



7. Determining Expenditure Levels for Multifamily Units

7.1 The multifamily energy audit performed on five-plus centrally heated buildings must take into account the local weather information, the fuel consumption cost of the building for a minimum of one year, and the labor and material costs for the suggested retrofits.

7.2 The dollar limit on measures performed on the building must be cost effective as determined by the DOE approved energy audit tools.

7.3 **Determining Budgets:** Budgets are determined by multiplying the number of eligible units by the DOE approved funding per unit amount.

Example: 100 unit building 70 eligible units (meets 66 percent)
 $70 \times \$8,497$ (FY25 approved DOE max per unit) = \$594,790.00 budget



COLORADO

Energy Office

Weatherization Assistance Program

CEO-WAP-202 Budget Revisions

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO WAP: [102](#); [2 CFR 200.308](#)

1. Abstract

1.1 Subgrantees are required to submit a State approved budget request identifying projected costs for each funding source, by subcategory, to Colorado Energy Office Weatherization Assistance Program (CEO WAP) prior to the beginning of a new program year.

2. Budget Revisions

2.1 Subgrantees are allowed to request to modify their Budget Support Sheet to reflect actual expenditures providing:

2.1.1 They do not exceed any budgetary regulations and budgetary principles regarding category caps and shifts, as defined by individual funding sources.

2.1.2 Budgetary adjustments are not made between funding sources.

2.1.3 They do not increase the funding levels in the Administrative, Technical, and Training Assistance (T&TA), or Leveraging categories in excess of the amounts identified in the original CEO WAP approved budget request.

2.1.4 Individual funding source budget category shifts will not exceed 10 percent of the total funding source budget on a quarterly basis.

2.1.5 Funds in the Administrative, T&TA, and Leveraging categories may be moved to other budget categories as needed to cover actual expenditures.

3. Revision Submission

3.1 Subgrantees submit a written waiver request that details:

3.1.1 The total amount needed to be shifted.

3.1.2 The percentage of funds needing to be shifted per funding source.

3.1.3 The categories that will be impacted.

3.1.4 Brief justifications regarding why the shifts are necessary.

4. Contract Amendments

4.1 See CEO WAP 102



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Weatherization Assistance Program

CEO-WAP-203

Invoicing

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [202](#), [701](#); [2 CFR 200.305](#)

1. Abstract

1.1 Subgrantees of the Colorado Energy Office Weatherization Assistance Program (CEO WAP) are reimbursed monthly, based on the submission of a monthly invoice.

2. Invoice Submission

2.1 The invoice is to be submitted by the subgrantee to the CEO WAP Sr. Contract Manager or a CEO WAP Administrative Team member on a monthly basis.

2.1.1 WAP is a cost reimbursement program, and only job costs in accordance with CEO policy should be invoiced to CEO WAP.

2.2 CEO WAP reserves the right to withhold payment until discrepancies are resolved.

2.3 Subgrantees must indicate on the invoice if they are billing CEO for jobs in progress or completed jobs.

2.4 Invoicing for Jobs in Progress

2.4.1 Subgrantees may invoice for jobs in progress so long as they are invoicing for completed items, such as: a completed audit, completed work on one or more measures, completed health and safety measure(s), etc.

2.5 Invoicing for a Closed Job

2.5.1 To invoice CEO for jobs that have been closed, the job must meet the criteria that define it as a “Closed Job”. See CEO WAP 701.

2.6 Invoice Due Date

2.6.1 The monthly invoice shall be submitted to CEO WAP on or before the 18th day of each month during the term of the contract.

2.6.1.1 Should the 18th fall on a weekend or holiday, the invoices will be due on the following business day.

2.6.2 A confirmation email from the subgrantee is to be sent to CEO in order to notify and confirm that the **signed** invoice is ready for processing.



2.7 Valid Invoices

- 2.7.1 Invoices are not deemed valid until they have been approved by CEO WAP Personnel.
- 2.7.2 CEO WAP reserves the right to request complete backup documentation for any monthly invoice at any time. When requested, subgrantees would be expected to provide all backup documentation within an agreed upon timeframe in order for CEO WAP to approve the monthly invoice on time. Backup documentation includes, but is not limited to, any vendor or internal invoices, approved timesheets, general ledger summaries, receipts for supplies and/or services and proof of payment (i.e. canceled checks and bank statements) that add up to the amount being requested in the given invoice.
- 2.7.3 CEO WAP personnel will approve all invoices on or before the Accounting Submission Date; the 25th day of each month during the term of this contract.
 - 2.7.3.1 Should the 25th fall on a weekend or holiday, the invoices will be submitted on the following business day.

2.8 Late Invoices

- 2.8.1 Invoices submitted after the due date, or not approved by the accounting submission date, will be considered late.
 - 2.8.1.1 Late invoices will be processed at the discretion of the CEO WAP personnel.

3. Invoice Budget Categories

- 3.1 The invoice contains the following 15 budget categories in the invoice spreadsheet:
 - 3.1.1 Administration Labor (AD-Labor)
 - 3.1.2 Administration Other (AD-Other)
 - 3.1.3 Administration Indirect (AD-IND) - only for applicable subgrantees
 - 3.1.4 Operations Contractor (OP-Contractor)
 - 3.1.5 Operations Labor (OP-Labor)
 - 3.1.6 Operations Materials (OP-Materials)
 - 3.1.7 Operations Other (OP-Other)
 - 3.1.8 Health and Safety Contractor (HS-Contractor)
 - 3.1.9 Health and Safety Labor (HS-Labor)
 - 3.1.10 Health and Safety Materials (HS-Materials)
 - 3.1.11 Liability (Liability)
 - 3.1.12 Audit (Audit)
 - 3.1.13 Capital Equipment (CAPEQ)
 - 3.1.14 Leveraging (Leveraging)



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- 3.1.15 Weatherization Readiness Funds (WRF)
- 3.1.16 Training and Technical Assistance (TTA)
- 3.2 Invoice amounts must fall within the available line item budgets.
- 3.3 Invoices should not contain negative amounts in any funding source total.
- 4. While budget adjustments may be made during monthly invoicing using the quarterly adjustment table in the invoice workbook, subgrantees must follow the instructions in the invoice workbook, **and** can not make changes without consulting CEO staff.



CEO-WAP-204

Advance

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO WAP: [204 A1](#); [2 CFR 200.305](#)

1. Abstract

1.1 It is understood that some subgrantees require an advance of funds. Colorado Energy Office Weatherization Assistance Program (CEO WAP) will attempt to provide an advance when possible. This policy describes the process and requirements for subgrantee advances.

2. Advance Request

2.1 Subgrantees may request an advance of funds. This advance amount is 20 percent of the total current contract amount and is advanced to the subgrantee in July and January of the fiscal year. The steps of the process are as follows:

2.1.1 Prior to the start of the new fiscal year, CEO WAP staff and subgrantee staff will work together to complete the Advance Request form.

2.1.2 The Advance Request form and an invoice for the advance amount is submitted to accounting on or before July 1 for advance payment from WAP to the subgrantee on July 1 or the first business day thereafter.

3. Accepted Advance Request

3.1 Upon successful submission, the advance is paid to the subgrantee.

3.1.1 Note: All previously advanced funds must be repaid by the subgrantee to WAP before the new advance is paid from WAP to the subgrantee.

3.2 The subgrantee repays the 20 percent of the advance amount to WAP during each of the next five months, July through November, as a deduction from the normal monthly invoice reimbursement amount for program activities.

3.2.1 If the reimbursement amount for program activities is less than the advance payback amount (i.e. the subgrantee is unable to pay back the full 20 percent of the advance), the difference must be paid back during subsequent months.



- 3.3 The advance must be fully repaid on or before the December invoice payment date. An advance that is not yet repaid will prohibit the payment of the subsequent advance.
 - 3.3.1 Once the previous advance is repaid to WAP, the Advance Request form and an invoice for the advance amount is submitted to accounting on or before January 1 for advance payment from WAP to the subgrantee on the first business day after January 1.
 - 3.3.2 This process shall be repeated for the months of January through May
 - 3.3.3 For the month of June it will be ensured that the advance has been repaid prior to July 1 of the following program year.
4. **Discrepancies**
 - 4.1 Discrepancies between the advance and actual expenditures will be reconciled within 45 days of receiving a valid invoice.
5. **Revoking Advance Approval**
 - 5.1 CEO WAP reserves the right to revoke monthly advance approval if a subgrantee is on special conditions, is deemed “high risk”, or if other reasons warrant repeal.
6. **Interest**
 - 6.1 Subgrantees are expected to maintain advances in interest bearing accounts unless the most reasonable interest bearing account would not be expected to earn interest in excess of \$100 per year, or the depository would require an average or minimum balance so high that it would not be feasible within the State cash resources.
 - 6.1.1 Interest earned on advances:
 - 6.1.2 Up to \$100 per year may be retained by the subgrantee for administrative expenses.
 - 6.1.3 In excess of \$100 per year is to be returned to the State of Colorado via money order or check, at the end of the program year.
 - 6.1.3.1 The money order or check should be mailed to CEO and made payable to the “State of Colorado - Colorado Energy Office”.



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Energy Office

Weatherization Assistance Program

CEO-WAP-205

Procurement Procedures

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO WAP: [201](#), [601](#), [808](#), [205 A1](#);
[2 CFR 200.317 - 200.327](#), [10 CFR 440.21](#); [WPN 13-4](#)

1. Abstract

1.1 This policy describes the procurement procedures and requirements for subgrantees of Colorado Energy Office Weatherization Assistance Program (CEO WAP).

2. Procurement Policy

2.1 Subgrantees of CEO WAP are required to have current, written procurement procedures on file prior to executing a contract for weatherization services.

2.1.1 This document must explain the procedures for purchasing all goods and services, and express how they are maintaining compliance with 2 CFR 200.317 - 200.327 (General Procurement Standards) and 10 CFR 440.21 / Appendix A - Weatherization materials standards and energy audit procedures.

2.2 For all procurement situations the appropriate solicitation and bids must be documented clearly and thoroughly in the Procurement Packet.

3. Procurement Guidance

3.1 CEO WAP, and all of its subgrantees, are required to follow procurement procedures in compliance with the following federal regulations:

3.1.1 2 CFR 200.318 - 200.327, General Procurement Standards

3.1.2 Subgrantees are required to follow all guidance in 2 CFR 200.318 - 200.327 in their internal procurement policies.

3.1.3 10 CFR 440.21 / Appendix A - Weatherization materials standards and energy audit procedures

3.1.3.1 Only weatherization materials which are listed in appendix A, and those which meet or exceed the standards prescribed in appendix A, may be purchased, with the exception of materials that are covered by a CEO WAP waiver, such as solar photovoltaic systems. See CEO-WAP-808.



- 3.1.4 40 CFR 247 (Comprehensive Procurement Guideline for Products Containing Recovered Materials)
 - 3.1.4.1 The use of recovered materials is required to be used to the maximum extent possible.
 - 3.1.4.2 The subgrantee is the "procuring agency" for purposes of this regulation. The threshold for the regulation is \$10,000 of purchases of one of the items or functionally equivalent items in a year.
 - 3.1.4.3 When this threshold applies, the policy of CEO WAP is to allow a price differential of up to 15 percent for the purchase of the recovered items.
- 3.1.5 Appendix II to 2 CFR 200
 - 3.1.5.1 Contracts must contain provisions in Appendix II, Part 200; Contract Provisions for Non-Federal Entity Contracts Under Federal Awards.
 - 3.1.5.2 Debarment and suspension - A contract award (see 2 CFR 180.220) must not be made to parties listed on the governmentwide exclusions in the System for Award Management (SAM), in accordance with the OMB guidelines at 2 CFR 180.

3.2 State of Colorado

- 3.2.1 When procuring property and services under a non-federal award, CEO WAP must follow the same policies and procedures it uses for procurements from its federal funds.
 - 3.2.1.1 This is in accordance with federal regulations for any entity receiving federal funds specifying that those entities may only have one procurement policy regardless of its funding source.

4. Procurement Methods

4.1 Agencies must have their own procurement policy.

4.1.1 The agency procurement policy needs to at the least meet the criteria in 2 CFR 200.320, including the agencies micro-purchase threshold, their definition of small purchases and defining what adequate competition is for small purchases, and the threshold for formal procurement procedures and the outline of those procedures (as related to competitive proposals, sealed bids, and formal advertising).

5. Procurement

- 5.1 Subgrantees of CEO WAP must submit a request for approval to the Sr. Contract Manager and receive approval prior to executing any sole-source procurement per 2 CFR 200.320(c).



- 5.1.1 Circumstances for Noncompetitive Procurement: Procurement by noncompetitive proposals may be used only when one or more of the following circumstances apply:
 - 5.1.1.1 The item is available only from a single source.
 - 5.1.1.2 The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation.
 - 5.1.1.3 After solicitation of a number of sources, competition is determined to be inadequate.
 - 5.1.1.4 CEO WAP authorizes noncompetitive proposals in response to a written request from the subgrantee.
- 5.1.2 Prior Approval: If any of the conditions in the preceding section are met, the subgrantee must submit the following in writing to the Sr. Contract Manager to receive prior approval from CEO WAP:
 - 5.1.2.1 A copy of the bid or proposal (including evaluation criteria).
 - 5.1.2.2 Information on the method of notification to the public of the competitive request.
 - 5.1.2.3 The response received and justification for any restrictive language in the request, if applicable.

6. Refrigerator Bids Package Requirements

- 6.1 All prices must include the cost to purchase, deliver, set-up of new the appliance(s), removal the old appliance(s), and recycling of the old appliance(s), including secondary or under-used appliances, in a manner consistent with the environmental standards in the Clean Air Act (1990), Section 608, as amended by Final Rule 40 CFR 82, May 14, 1993.
- 6.2 No used appliance(s) shall be salvaged, re-claimed, re-used, sold, or distributed in any way.
- 6.3 The contractor that installs the refrigerator or freezer will be responsible for the correction of any damage inflicted upon the new appliance or the client's furnishings, floor coverings, woodwork, etc.

7. Capital Equipment

- 7.1 Prior Approval
 - 7.1.1 Any purchase of capital equipment, including vehicles, must be referred to CEO WAP Program Manager for prior approval.
 - 7.1.2 As part of requesting prior approval, CEO WAP 205 A1 Capital Equipment Request Form must be submitted to a CEO WAP. See CEO-WAP-201.
- 7.2 Vehicles and Equipment
 - 7.2.1 Refer to CEO WAP 505 for all guidance related to the purchase, disposal, and use of all vehicles and equipment.



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8. Non-Compliance and Monitoring

8.1 Costs incurred by a subgrantee through procurement procedures not in compliance with the guidelines shall be subject to disallowance by CEO WAP.

8.1.1 Such non-compliance may also be grounds for high-risk status that results in additional fiscal monitoring and training, contract suspension, and/or termination.

8.2 Administrative Monitoring

8.2.1 The subgrantee is responsible for retaining all documentation necessary to verify compliance with the applicable procurement regulations. See CEO WAP 601.



301 Client Eligibility Criteria & Application

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO WAP: [306](#), [401](#), [402](#), [403](#); CEO-WAP:[301 A1-23](#);

[10 CFR 440.22](#), [WPN 22-3](#), [WPN 22-5](#), [WPN 22-12](#); [WPN 24-3](#)

[Summary of Immigrant Eligibility Restrictions Under Current Law](#); [SB21-199 CRS 24-76.5-103](#),
[HUD](#) and [CHFA](#)

1. Abstract

- 1.1 This policy describes Colorado Energy Office Weatherization Assistance Program (CEO WAP) eligibility criteria for receiving WAP services for applicants in single family and multifamily residences, as well as the appeal process for denial of service based on eligibility.
- 1.2 Eligibility is determined by income or participation in the Low-Income Home Energy Assistance Program (LEAP) or other approved State programs. This policy supports the ColoradoWAP Application.
- 1.3 Any client or applicant cannot be compelled to resubmit or be requalified for WAP more than once every 12 months, per federal guidance.

2. Client Eligibility Related Dates

- 2.1 There are **three** required dates which must be recorded in Salesforce and three on the application within the file related to application approval:
 - 2.1.1 **Required: Completion Date:** The date on which the client application is complete and ready for processing.
 - 2.1.1.1 Exception: For LEAP clients, if using the Top Sheet in lieu of the Application, this is the date the client signs the top sheet.
 - 2.1.2 **Required: Approval Date:** The date on which the client is approved for weatherization. This is the date the subgrantee verifies eligibility and notifies the client, and serves as the first day of eligibility. This date should be within 30 calendar days of the completion date.
 - 2.1.2.1 Exception: For LEAP clients, if using the Top Sheet in lieu of the Application, the approval date will be the date when the subgrantee signs the LEAP Top Sheet, and the



completion date will be when the client signs the Top Sheet. In such cases, LEAP clients may have a completion date after the approval date.

2.1.3 Required: Expiration Date: Eligibility expires 12 (twelve) months from approval date if an energy audit has not been initiated. This is the date on which the client's income must be recertified.

2.1.3.1 Exception: The expiration date for LEAP qualified applicants using LEAP funds is based on the LEAP funding calendar.

2.1.4 Application Signature Date: The date on which the client signed an online application. Agencies do not need to manually enter into Salesforce.

2.1.4.1 This will only be included in Salesforce for online applicants.

2.1.5 Recertification Date: Only if applicable.

2.1.5.1 If the 12 months have lapsed or the LEAP funding calendar has passed, enter the date the agency recertifies the client's income eligibility for weatherization. This is the date the income is recertified, the award letter is reviewed and current, or the client is on a more recent LEAP list.

2.1.5.2 If the client needs to be recertified for weatherization more than once, update this field with the most recent recertification date.

2.1.6 Solar/ASHP recertification date: Only if applicable.

This is the date the income is recertified in order for the client to receive solar or ASHP. See CEO WAP 808 and 809.

3. Single Unit Client Eligibility

3.1 All clients receiving services under CEO WAP must first have their eligibility verified by the subgrantee and documented in the client file. A client may be considered eligible if they fall into one of the following categories:

1. Meeting current fiscal year income guidelines as indicated in the income qualification chart.
2. LEAP recipient.
3. Automatic qualifier due to being the recipient of another state program.

3.2 Single Family and Room Rental

3.2.1 Individuals who are cohabiting, or if one or more of the inhabitants pays rent to someone in the home with a formal rent/contract, all such individuals are considered members of the household.



- 3.2.2 All members of the household and all their associated income must be included on the application, unless the household member is under 18.
- 3.2.3 If the applicant is a renter, the landlord must sign the landlord consent form.
- 3.2.4 Landlord contributions only apply to multifamily buildings and not single family.
- 3.3 Temporary Housing**
 - 3.3.1 (e.x. Short-term housing, vacation rentals, AirBnb, VRBO, etc.). Temporary housing may be weatherized if all three of the below conditions are met:
 1. The applicant must own the dwelling (not be a guest), AND
 2. The dwelling must be the applicant's main home and they must live there, AND
 3. The applicant has to qualify after disclosing their AirBnB income in addition to any other income.
- 4. Eligibility by Income Qualification Type**
 - 4.1 Definition of Income**
 - 4.1.1 Income means the gross total of cash receipts earned and/or received by the applicant and other household members, before taxes, during the applicable tax year(s), exclusions to this are listed below.
 - 4.2 Proof of Eligibility**
 - 4.2.1 Each client file must contain an application from the client that contains the required demographics and income documentation for all household members living in the residence.
 - 4.2.2 Client file may contain a notarized statement of no income or a third-party certification office stipulating the income levels of the household if applicable.
 - 4.2.3 Exceptions:
 - 4.2.4 The client file does not need to include or record the earned income or unemployment compensation for minors under the age of 18 (or full-time high school students) at the time of the application.
 - 4.2.5 The client file does not need to include income information if using an automatic qualifier.
 - 4.3 Determining Gross Income**
 - 4.3.1 Gross income is determined before deductions for taxes, insurance, etc. Therefore, when regular Social Security is



included in income, the gross must be before Medicare deductions.

- 4.3.2 In situations where the legal dissolution of a family has occurred, for any cause during the previous 12 months, an individual may use their income only since the dissolution, annualized, to determine eligibility in accordance with the 60% of state median income guidelines as defined by the United States Government Department of Health and Human Services (HHS).

4.4 Cash Receipts

- 4.4.1 Cash Receipts include the following:

- Money, wages, and salaries, before any deductions.
- 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).
- 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.
- Private pensions, government employee pensions (including military retirement pay), and regular insurance or annuity payments.
- Dividends and/or interest.
- Net rental income and net royalties.
- Periodic receipts from estates or trusts.
- Net gambling or lottery winnings.

4.5 Income Exclusions

- 4.5.1 The following Cash Receipts are not considered sources of income for the purposes of determining applicant eligibility and should be ignored when determining eligibility. Should an applicant provide this documentation it should be either destroyed or redacted from the application:

- Employment income for people 17 years and younger
- Child support
- Capital gains.
- Any assets drawn down as withdrawals from a bank.
- Money received from the sale of a property, house, or car.
- One-time payments from a welfare agency to a family or person who is in temporary financial difficulty.
- Tax refunds
- Gifts, loans, or lump-sum inheritances.



- College scholarships.
- One-time insurance payments, or compensation for injury.
- Non-cash benefits, such as the employer-paid or union-paid portion of health insurance.
- Employee fringe benefits, or food or housing received in lieu of wages.
- The value of food and fuel produced and consumed on farms.
- The imputed value of rent from owner-occupied non-farm or farm housing.
- Depreciation for farm or business assets.
- Federal non-cash benefit programs, such as Medicare, Medicaid, food stamps, school lunches, and housing assistance.
- Combat zone pay to the military.
- Reverse mortgages.
- Payments for the care of foster children.

5. Documentation for Income Determination

- 5.1 Copies of income check stubs or checks with pay period dates.
- 5.2 Copy of a signed federal income tax return form, or all IRS W-2s (withholding) forms for the most recent tax year.
 - 5.2.1 When using tax forms documenting annual (calendar year) income, you can divide this amount by 12 to determine an average monthly income.
 - 5.2.2 Use this average for the months preceding the eligibility determination.
- 5.3 A copy of an electronically submitted income tax return with a verification number proving that the return was filed.
- 5.4 A letter, third-party certification, or other official verification of income from an external source (e.x. An official letter and statement of income on company letterhead). See CEO WAP 301 A20.
- 5.5 For those who are self-employed, they must fill out and sign the self-employment form, and provide the relevant income documentation. See CEO-WAP-301 A19.
 - 5.5.1 Subgrantees must use the CEO form or receive approval from CEO personnel to use a different form.
- 5.6 Affidavit of Income or No Income: After all avenues of documenting income eligibility are exhausted, self-certification of income or no income is allowable, but evidence of the various attempts at proving eligibility must be contained in the client file. This affidavit must be



notarized and signed by the applicant indicating they have no other proof of income or they have no income. See CEO WAP 301 A3a-b.

- 5.6.1 If the WAP applicant indicates they do not have any income, but other adult members of the household do indicate income and demonstrate that income through acceptable documentation (see CEO WAP Policy 301 Client Eligibility Criteria and Application) then the applicant is NOT required to present a notarized affidavit of no income. The notarized no income affidavit is only required in cases when no one in the household claims income.

6. Funding Specific Income Eligibility

- 6.1 Income eligibility limits for Colorado WAP are set each year in accordance with:

- 6.1.1 Federal DOE income limit chart for 200% Federal Poverty Level (FPL)
6.1.2 Federal LIHEAP income limit chart for 60% State Median Income (SMI)
6.1.3 CHAFA income limit chart for 80% Area Median Income (AMI)

6.2 DOE Formula & BIL Funding Eligibility

- 6.2.1 All jobs which are funded with any DOE Formula or BIL monies must have a gross income total at or below 60% of the SMI for households of 1-6 residents.
6.2.2 For households with 7 residents, either SMI or FPL may be used based on whichever gross income limit is higher at the time of approval.
6.2.3 For households of 8 or more residents the gross household income should be at or below 200% FPL. See CEO WAP 301 A18.
6.2.4 All income limits should mirror those which were most recently released by DOE and DHS respectively. See WPN 22-3.

6.3 LEAP/LIHEAP Funding Eligibility

- 6.3.1 All jobs which are funded with any LEAP monies must have a gross income equal to 60% SMI or less regardless of household size. See CEO WAP 301, A18.

6.4 State and Utility Funding Eligibility

- 6.5 All jobs funded using only state and utility funding have varied income limits based on the funding source. These may be based on FPL, SMI, or AMI. See CEO WAP 301, A18.

- 6.5.1 While in many counties state funding allows for households to have higher income than federal funding, this is not the case for all Colorado counties. As such, subgrantees are required to carefully review if state funding is the most appropriate.



7. Automatic qualification through Enrollment in Federal & State Programs

7.1 The applicant is automatically qualified given current enrollment in an approved state or federal program listed below. The proper documentation listed below must be kept in the client file with the date of expiration clearly stated. See CEO-WAP-306.

7.1.1 Low Income Home Energy Assistance Program (LIHEAP/LEAP)

7.1.2 Temporary Aid to Needy Families (TANF)

7.1.3 Supplemental Security Income (SSI)

7.1.4 Aid to the Needy Disabled (AND)

7.1.5 Supplemental Nutrition Assistance Program (SNAP)

7.2 Determining eligibility via Award Letter

If eligibility is based upon the client's enrollment in an approved state or federal program, and documented proof of one of the aforementioned state programs is provided, verification through one of the following must be kept in the WAP client file:

7.2.1 A copy of the award notification letter from within the preceding 12 months of determination of eligibility.

7.2.2 Written verification from the corresponding agency, on their letterhead, which states the client name and eligibility date.

7.2.3 A copy of a payment check stub stating the type of payment.

7.3 For LEAP only:

7.3.1 A copy of the client's LEAP Top Sheet produced from the LEAP List is acceptable documentation of the eligibility and must be retained in the client file.

7.3.2 If a LEAP recipient moves within the same county or to a new county within the state of Colorado, they are still eligible for WAP services if the home has not been weatherized in the past 15 years.

7.3.3 All LEAP recipients that are eligible for weatherization shall not be required to fill out an additional application, however they are required to sign all approval and acknowledgment documents for WAP.

8. Multifamily Resident Eligibility

8.1 Two, three, and four-unit buildings and buildings with more than five units, are all considered multifamily buildings for the purposes of eligibility, whether centrally or individually heated.

8.1.1 In line with DOE's definitions, two/three/four-plexes are categorized as 2-4 unit buildings, buildings with 5-24 units are small multifamily buildings, and 25+ units are large multifamily buildings.



8.1.2 Individual units within multifamily buildings may be weatherized by the single-family subgrantee, if they meet the income eligibility guidelines.

8.1.2.1 DOE funds may not be used for WAP activities in individual units within a multifamily building. DOE funds may only be used if the whole building is being weatherized, and approval has been granted.

8.2 Building Eligibility Determination

8.2.1 Weatherization of a multifamily building is permitted if at least 66% of the units are occupied by income eligible households, or 50% for duplexes and four unit buildings.

8.2.2 An exception is made for larger multifamily buildings with significant energy savings potential and owner contribution.

8.2.3 Those buildings with significant energy savings potential only require a minimum of 50% income eligible households.

8.2.4 All buildings receiving services under the CEO WAP grant must have at least 10% of the qualified households directly verified for WAP eligibility.

8.2.4.1 This will be documented in the client file.

8.3 Building Qualification

8.3.1 When a multifamily building is qualified for weatherization with the required rate of eligible units being 50% or 66% or greater, the remaining units which were not directly qualified for WAP may receive services so the entire building is weatherized.

8.3.1.1 These other units will receive the qualification of “Building Qualification” in Salesforce.

8.3.1.2 This qualification was previously listed as “CEO-WAP-402”.

8.3.1.3 A reference to the other unit(s) that qualify the whole building must be documented in Salesforce.

8.3.1.3.1. An application is required from all units. If a unit does not income qualify (i.e. is approved via building qualification), the application should be on file and be referenced in Salesforce. No income verification is required.

8.3.1.3.2. If a unit is vacant, required permissions from the property owner must be granted and documented in Salesforce.

8.3.1.4 All previously qualified units with the “402” designation have been automatically relabeled “Building Qualification” retroactively.



8.4 Income Eligibility

8.4.1 Applicants may also receive written documentation from the building owner of household income information obtained to determine the client's eligibility to reside in the building..

8.4.2 If the building owner does not allow the subgrantee to keep a copy of such documentation due to confidentiality concerns, the subgrantee will visually inspect written documentation and sign the Multifamily Unit Information Form verifying the unit meets the income eligibility criteria.

8.4.3 It is the subgrantee's responsibility to ensure the building owner agrees to keep such documentation for at least seven years from the time of weatherization.

9. Categorical Eligibility for Small and Large Multifamily through HUD Means-Tested Programs

9.1 Applicants participating in HUD means-tested programs are automatically qualified for weatherization services, so long as they fulfill the criteria below:

9.1.1 They dwell in a building or complex in which there are five or more units

9.1.2 They are already enrolled in non Veterans Affairs (VA) HUD means-tested programs

9.1.3 Their income qualifications are at or below the income eligibility criteria for HUD services

9.2 HUD's means-tested programs accept households using percentages of Area Median Income (AMI) ranging from 30% AMI to 80% AMI.

9.3 As this serves as categorical eligibility, similar to that of LEAP, SNAP, etc., income verification is not needed for these clients.

10. Lawful Presence

10.1 Federal Lawful Presence Requirements

10.1.1 Applicants who are either a U.S. citizen, a legal permanent resident, or who are otherwise lawfully present in the United States may receive services using CEO WAP federal funding.

10.1.2 For DOE funded jobs, the lawful presence affidavit must be completed and signed by the applicant and included in the client file, except when qualified by an automatic qualifier (SNAP, TANF, SSI, LEAP, AND).

10.1.2.1 If another federal assistance program is used to automatically qualify the applicant for WAP, the Lawful Presence Affidavit does not need to be completed so long as the recipient of that program is also the WAP applicant.



- 10.1.2.2 If the WAP applicant is different from the recipient of the other federal assistance program, the Lawful Presence Affidavit must be completed by the WAP applicant.
 - 10.1.3 LEAP Applicants that are qualified via the LEAP top sheet (they are LEAP clients) do not need to fill out the lawful presence affidavit.
 - 10.1.4 If LEAP funds are used on a job of a non-LEAP recipient, a lawful presence affidavit is necessary but can be submitted by any member of the household, regardless of age or if the signatory is the applicant.
 - 10.1.4.1 **Lawfully Present Minor Child:** An income qualified unit with no lawfully present adult, but a lawfully present minor child is eligible for weatherization as a non DOE unit. Verification, not proof, of lawful presence for persons under 18 is required as outlined below.
 - 10.1.4.1.1. The subgrantee must obtain verbal confirmation from an adult member of the household that the child is indeed lawfully present in the United States.
 - 10.1.4.1.2. The subgrantee must indicate this confirmation note in the client file on the lawful presence affidavit, and include the date of confirmation, the minor's child's name, age, relationship to applicant, and citizenship or immigration status.
 - 10.1.4.1.3. Proof, such as requiring a birth certificate, of lawful presence for persons under 18 is not required.
- 10.2 State Lawful Presence Requirements**
- 10.2.1 As of July 1, 2022, "lawful presence requirements are discouraged for eligibility in any State or Municipality public benefits set forth by SB21-199, CRS 24-76.5-103". Thus, units being weatherized with non-federal funds do not require the completion of a lawful presence affidavit.
 - 10.2.1.1 Non-federal funding sources may include, but are not limited to:
 - 10.2.1.1.1. HB21-1105/Energy Assistance Benefits Charge (EASBC)
 - 10.2.1.1.2. CEO Wx
 - 10.2.1.1.3. Any other state or utility funding identified to the subgrantee in their annual budget.



10.3 Discrimination based on Immigration Status

10.3.1 Per Colorado Senate Bill 21-199, 24-76.5 101(2) & 24-76.5 103, under no circumstances will applications, or jobs, for individuals without lawful presence be considered, prioritized, or deprioritized differently than any other applications.

10.3.1.1 The only difference between an application with a lawful presence affidavit and one without is the type of funding source that may be used.

10.3.1.2 Should a subgrantee staff member, or office be found to discriminate or deprioritize an application or job because of the applicant or client's immigration status, the repercussions will be severe, and may transcend the authority of their subgrantee organization or CEO WAP Leadership.

11. Application Procedures

11.1 All applicants for CEO WAP must complete, sign, and date the CEO WAP Application prior to receiving services.

11.1.1 Exception for LEAP clients: The LEAP Top Sheet may be used in lieu of a WAP application

11.1.1.1 Client must review, sign, and date LEAP Top Sheet.

11.1.2 If there is a power of attorney (POA), the documentation of the POA must be included in the client file if the applicant is not signing directly.

11.2 Processing Time

11.2.1 Subgrantees should document their attempts to resolve incomplete applications from clients.

11.2.1.1 Subgrantees should show due diligence in attempting to resolve an incomplete application in a timely manner.

11.2.1.2 It is encouraged that the subgrantee develop a corresponding timeline to actively pursue incomplete applications with the applicants. Once that timeline expires, subgrantees should leave the application in pending status.

11.2.2 Once the application is complete, subgrantees must notify clients in writing within 30 calendar days if the application is approved or denied.

12. Eligibility Expiration

12.1 Each client application must contain the signature and date of the staff person determining the eligibility in the space provided in the CEO WAP application.



12.2 LEAP

12.2.1 Per the Colorado Department of Human Services and the Low Income Home Energy Assistance Program, LEAP qualified applications expire on September 30 of LEAP program year (federal fiscal year) in which they are qualified.

12.2.2 If LEAP qualification expires, other funding sources can be used, provided the client meets eligibility for those funds and they are within the 12 months of their eligibility.

12.3 All other qualifications

12.3.1 All automatic qualifiers (with the exception of LEAP) and income based qualifying applications will expire 365 days after the approval date of the application.

12.3.2 When the application expires, the client will need to recertify their income eligibility. The subgrantee must verify the client is still eligible and the client may use any method to qualify (even if different from original qualification).

13. Application Status Definitions

13.1 Submitted

13.1.1 The subgrantee has received an application (it does not have to be complete). If the application was submitted online, it will default to this status.

13.2 In Progress

13.2.1 The application is currently being processed and reviewed by the subgrantee.

13.3 Approved

13.3.1 Upon the application review, the subgrantee has determined that the applicant is approved for weatherization services.

13.4 Denied

13.4.1 Upon the application review, the subgrantee has determined that the applicant is denied for weatherization services.

13.4.1.1 A “Reason for Denial” must be entered to explain why the application was denied.

14. Approved Applications

14.1.1 Subgrantees are not allowed to modify the CEO WAP Application in any manner.

14.1.2 It is a requirement of all subgrantees to use the CEO WAP approved application, unless CEO approves an alternative.

14.1.3 It is acceptable to attach to the application any form(s) that are required by a county or council, such as liability forms.



14.2 Additional Requirements for Multifamily Applications

14.2.1 All applicants (building owners) for CEO WAP multifamily services must complete, sign, and date the CEO WAP Multifamily Weatherization Application prior to receiving services. See CEO-WAP-301 A12.

14.2.2 The applicant must obtain the following from each unit in the building:

14.2.2.1 Utility Bill Release form if individually metered. See CEO-WAP-301 A6-11.

14.2.2.2 The Multifamily Unit Information Form (MFUI) must include at least the last name and first initial of the first name of the resident of each unit. See CEO-WAP-301 A13.

14.2.3 Group Home or Shelter Applications

Applications for CEO WAP services from group homes or shelters should be prioritized in the same manner as applications from other rental units.

15. Appeals

It is the right of the client to appeal eligibility determination and the client must follow the CEO WAP appeal process. The following is the process for client appeals related to denial of service based on eligibility.

1.1. Client Appeal to Subgrantee

8.1.2 If the client is denied CEO WAP services, the client has 30 calendar days to appeal the decision to a subgrantee Program Manager or Executive Director.

8.1.3 A written response from the subgrantee to the client will be sent within 30 calendar days.

1.2. Client Appeal to the CEO WAP

8.2.1 If services are denied by the subgrantee, an appeal can be made to CEO WAP. The response from CEO WAP will be the final decision and will be shared with the client in writing within 30 calendar days of receiving the appeal.

8.2.2 Appeals from the client should be in writing and addressed to the Colorado Energy Office with attention to the WAP Associate Director via email or physical mail:

Email: weatherization@state.co.us

Address: 1600 Broadway, Suite 1960, Denver, CO 80202



CEO-WAP-302 Service Priorities

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [100 A3](#), [301 A1a - 301 A3b](#); [10 CFR 440.3](#), [10 CFR 440.16b](#), [10 CFR 440.21](#); [WPN 24-1](#);
[ACEEE Assessment 2020](#)

1. Abstract

1.1 Colorado Energy Office Weatherization Assistance Program (CEO WAP) requires that subgrantees prioritize categories in the selection of eligible clients for weatherization services.

2. Service Priorities

2.1 As defined in 10 CFR 440.16, priority is given to identifying and providing weatherization assistance to:

2.1.1 Households with a high energy burden:

2.1.1.1 The ACEEE defines energy burdens of 6 percent or greater as a high burden, and those of 10 percent or greater to be a severe burden, based on annual household energy cost divided by gross annual household income. See ACEEE Assessment 2020. See CEO WAP 100 A3.

2.1.2 Clients that fall into one or more of other priority categories including:

2.1.2.1 Households with a high or severe energy burden as defined by the American Council for an Energy Efficient Economy (ACEEE)

2.1.2.2 Elderly persons (aged 60 years and older).

2.1.2.3 Persons with disabilities.

2.1.2.4 Families with children under 6.

2.1.2.5 Counties with waitlists

2.1.3 Service priorities are to be considered in addition to completing at least one home in each county in their subgrantee region, if possible.

2.2 Persons with Disabilities

2.2.1 Defined as clients who receive vocational rehabilitation assistance, Social Security Disability Insurance (SSDI), Supplemental Security Income (SSI), Aid to the Blind, Aid to the Needy Disabled, veterans with 100 percent disability payments, those who self identify as having a disability, or those who provide a physician's statement which indicates incapacity to engage in gainful employment.

3. Service Priority Management

3.1 The aforementioned priorities are all designated on the client application and should be recorded correctly on the job record in Salesforce.



CEO-WAP-303 Client Confidentiality

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [103](#), [301](#), [306](#), [610](#), [301 A1a - 301 A3b](#) [303 A1a](#), [303 A1b](#), [303 A2](#)

1. Abstract

1.1 It is the policy of the Colorado Energy Office Weatherization Assistance Program (CEO WAP) that any and all information regarding clients be handled with the utmost confidentiality.

2. WAP Application and Determination of Eligibility

2.1 All information required during the application and determination of eligibility is to be protected against indiscriminate access by subgrantee staff, and is not to be made available for public review.

2.2 This information is to be placed in a secured storage area during its use and during the required record retention period.

2.3 Accessibility to LEAP client lists is to be limited to pertinent subgrantee staff, the subgrantee's financial and compliance auditor, and CEO WAP staff, or their authorized representatives.

2.4 It is a breach of confidentiality for the subgrantee to provide the local utility companies more information than necessary to secure the release of fuel consumption data.

2.4.1 For this reason, subgrantees must separate the utility release form from the client application to prevent having to submit the full application to the utility.

3. Subgrantee(s), contractor(s) and/or subcontractor(s)

3.1 Subgrantee(s), contractor(s), and/or subcontractor(s) will maintain no information about any individual in a manner that would violate the provision of the Privacy Act of 1974, as amended.

3.1.1 Breach of confidentiality by the subgrantee may be grounds for suspension and/or termination of funding. See CEO-WAP-303 A2.

3.1.2 All access to departed employees will be rescinded immediately.

3.2 **Subcontractors** are to be provided only the minimum amount of information required, regarding the client, which is necessary for the provision of the contracted services.

4. Client Records

4.1 Current client files should remain at the subgrantee office, stored in a secure location that prevents damage and protects client confidentiality.



- 4.2 Files should be made available to field staff that include the client's name, address, phone number, income level, and any other non-sensitive information (i.e. no social security numbers, etc.). See CEO-WAP-103 & 610.
- 4.3 Client files from the previous 6 program years will be stored on subgrantee property in a secure location that prevents damage and protects client confidentiality. See CEO WAP 306.
5. **Photographs**
 - 5.1 Photographs may only be taken if the client has agreed to and signed the photo release section of the application.
 - 5.2 The utmost discretion is to be used when photographing a client's home, including the subgrantee securing written authorization prior to taking any photographs in which the client's home may be recognizable (broad views of home versus detailed photos of windows, doors, etc). See CEO-WAP-301 A1-2.
6. **Confidentiality Release**
 - 6.1 There may be times when non-agency employees, members of the media, or other interested parties may visit a weatherization unit currently in-progress or a completed unit.
 - 6.1.1 In this circumstance, a confidentiality release form is required from the client to allow non-agency visitors access to the exterior and interior of their property. See CEO-WAP-303 A1.
7. **Consent to Share Personal Identifiable Information**
 - 7.1 A consent form has been added to the WAP application to allow clients to agree or decline the sharing of their Personal Identifiable Information (PII) with their utility providers.
 - 7.1.1 This will allow them to more easily enroll in income-based programs that may be monetarily beneficial to the household. See CEO WAP 301 A1
8. **Optional Client Assistance**
 - 8.1 WAP applicants and clients have the option to enlist other entities to aid them in navigating the weatherization process.
 - 8.1.1 These outside resources may be whomever the client elects (friend, family, organization, etc.).
 - 8.1.2 This option is especially useful to the subgrantee in overcoming potential language barriers.



CEO-WAP-304 Client Education

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [301](#), [306](#), [304 A1-2](#); [10 CFR 440.22\(d\)](#)

1. Abstract

1.1 This policy establishes Colorado Energy Office Weatherization Assistance Program (CEO WAP) position, along with Department Of Energy (DOE), requirements regarding the information and education that is required to provide to clients by subgrantee staff.

2. Occupant Pre-Existing or Potential Health Concerns

2.1 When the client's health may be at risk and/or the work activities could constitute a health or safety hazard, the occupant at risk will be required to take appropriate action, based on severity of risk.

2.1.1 Temporary relocation of at-risk occupants may be allowed on a case-by-case basis.

2.2 Occupants are required to reveal known or suspected health concerns as part of the initial application for weatherization.

2.2.1 The form is to be reviewed with the client during the audit and the auditor's signature is required. See CEO-WAP-304 A1-2.

2.3 The auditor is to provide to the client information regarding:

2.3.1 Any known risks of materials that will be installed in their home.

2.3.2 The potential dangers of substances which may be already located inside their homes, such as mold, asbestos, lead, and radon.

2.3.3 Subgrantee contact information is to be provided in order for the client to be able to inform the subgrantee of any issues.

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

3. Warranty and Energy Savings

3.1 Subgrantees that receive tenant complaints regarding rent increases should refer them to organizations (i.e. legal aid, tenant-landlord mediation organizations, etc.) which can offer assistance in resolving this issue.

3.2 Clients must be informed of program requirements and warranties.

3.3 Clients are to be informed of the measures installed in their home and how they can interact with their home to increase the potential energy savings.

4. Adult Education

4.1 Adult education is required for all clients



- 4.2 A mixture of verbal and written communication may be used.
- 4.3 The above information should be presented with the following concepts in mind:
 - 4.3.1 Quality education can empower the client to have some degree of control over the energy consumed by the household.
 - 4.3.2 Clients will generally respond positively to the sense of empowerment and control over their home.
 - 4.3.3 The educator must be perceived to be trustworthy and well-informed.
 - 4.3.4 Information should be presented clearly and concisely.
 - 4.3.5 The key points should be consistently reinforced through all stages of work - from intake through inspection.
 - 4.3.6 Assume that you will succeed in conveying useful information to every client.
 - 4.3.7 Recognize that, despite your best efforts, there will be some failures due to apathy, distractions, or other causes.
 - 4.3.8 Any failure to provide education to the client on the basis, or assumed basis, of race, color, immigration status, gender expression or identity, sexual orientation or any other criteria will result in severe consequences.



CEO-WAP-305 Client Complaints

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [305 A1-A2](#)

1. Abstract

1.1 This policy addresses the process and requirements for addressing client complaints, disputes, and appeals received by either the subgrantee or, submitted to the Colorado Energy Office Weatherization Assistance Program (CEO WAP).

2. Client Complaint Received by Subgrantee

2.1 Subgrantees will follow their own internal processes to address complaints, and all complaints must be handled in an expedited manner.

2.2 If a client is unsatisfied with the resolution provided by the subgrantee, they may then appeal that decision to CEO WAP.

2.3 Complaints from family members or friends of clients who have not been designated as client advocates to subgrantee staff may not file a complaint or dispute.

2.3.1 Client advocates are designated by the client at any time via formal notification to the subgrantee.

3. Subgrantee Complaint Procedure

3.1 All subgrantees are required to have a written and verbal complaint procedure that records all identification and other pertinent information. Any substantiating evidence, such as photos, staff written comments, defective materials, additional costs, etc., must be included in the client file. See CEO-WAP-305 A1 for a template Client Complaint Resolution Form which must also be kept in the client file

3.1.1 A copy of CEO-WAP-305 A1 must be sent to CEO WAP in the case of an appeal.

3.2 Subgrantee Complaint Log: Subgrantees, as part of their complaint procedure, are required to keep a log of all client complaints for the program year.

3.2.1 They may use the provided template or create their own. See CEO-WAP-305 A2.

3.3 A complaint is defined as any dissatisfaction that a client seeks resolution, shared with any subgrantee staff, verbally or in writing, or on any and all forms provided to the client by the subgrantee, including complaints received by CEO WAP and forwarded to the subgrantee.



3.4 Complaint Resolution

- 3.4.1 When the subgrantee has reached a conclusion for a client complaint, the decision must be shared with the client in writing (via letter).
- 3.4.2 This letter should also include the CEO WAP general email, mailing address, and directions on how to appeal the decision.

3.5 Client Complaint Received by CEO WAP

- 3.5.1 If a client contacts CEO WAP in regard to a complaint that has not yet been addressed by the subgrantee, CEO WAP will direct that client to their respective subgrantee, and inform the subgrantee of the complaint with contact information for the client.
- 3.5.2 Customer Satisfaction Survey responses are generally considered to be feedback and will be used for training purposes, however, a response may be considered as a complaint if the response requires urgent follow up on the part of the subgrantee
- 3.5.3 In addition to passing the complaint information along to the respective subgrantee, CEO WAP will record the general information of the client complaint in the Client Complaint Log .
- 3.5.4 Complaints must have the subgrantee resolution before they can be directed to CEO WAP as an appeal.

3.6 Subgrantee WAP Documentation

- 3.6.1.1 Subgrantees must save copies of all information, notes, emails, and transcripts of all communications related to a client complaint in a client folder.
- 3.6.1.2 If a client is unsatisfied with the written decision of the subgrantee in response to their complaint, the client may appeal that decision to CEO WAP.

4. Client Appeal Process to CEO WAP

4.1 Requirements for Client Appeals

- 4.1.1 Appeals must be received in writing (either via letter or email) by CEO WAP and must include a copy of the subgrantee decision that the client is appealing.
 - 4.1.1.1 Email: weatherization@state.co.us
 - 4.1.1.2 Address: 1600 Broadway, Ste 1960, Denver, CO, 80202

4.2 Client Appeal Procedure

- 4.2.1 When an appeal is received at CEO WAP, a formal report of the complaint will be initiated. The subgrantee will be required to work closely with the CEO WAP to investigate and/or provide
CEO WAP



4.2.2 The CEO WAP Associate Director will coordinate with the

subgrantee and CEO WAP staff to determine a response to the client appeal.

4.2.2.1 Their decision will be sent to the client in writing within 15 working days of receipt of the client appeal.

4.2.3 If the client is unsatisfied with the CEO WAP Associate Director's response, they may appeal one additional time via the same appeals process to the CEO WAP Director

4.2.4 The CEO WAP Director's decision will be sent to the client within 15 working days of receipt of the second appeal and is considered the final response to the client. No more appeals may be made after this decision.

5. CEO WAP Documentation

5.1 Appeals received by CEO WAP will be kept on file for the required amount of time.

5.2 CEO WAP will record the general information of the client complaint in the associated program year's records.



CEO-WAP-306

Client File Requirements

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [301](#), [305](#), [402](#), [403](#), [404](#), [502](#), [701](#), [702](#), [703](#), [801](#), [802](#), [807](#), [808](#), [809](#), [902](#), [903](#);
CEO WAP: [301 A5](#), [301 A18-19](#), [304 A1-A2](#), [306 A1](#), [306 A2](#), [404 A4](#), [802 A11](#), [802 A12-A13](#), [807 A1](#), [808 A1-A5](#); [10 CFR 440.22\(a\)](#); [WPN 22-7](#); [Colorado Senate Bill 21-199](#)

1. Abstract

- 1.1 This policy deals with the requirements for client file documentation.
- 1.2 Each subgrantee must maintain a client file for each household receiving Colorado Energy Office Weatherization Assistance Program (CEO WAP) services.
- 1.3 A client file consists of the physical file, the Salesforce record, or the combination of the Salesforce record and the physical file.

2. Client File Security

- 2.1 Client files are considered a permanent record and are subject to a set retention schedule and are therefore required to be kept in a secure location at all times to ensure confidentiality.

3. Eligibility and Permission Documentation

- 3.1 The client approval process is to include an approved CEO WAP application, complete with the applicant's signature.
 - 3.1.1 Title XVII, the Government Paperwork Elimination Act, states that online signatures may be accepted for documents electronically submitted to governmental agencies.
 - 3.1.1.1 An official and verified e-signature will be accepted on the application.
 - 3.1.1.2 Each application must also include the signature and applicable dates while the subgrantee staff person determines the client's eligibility.
 - 3.1.1.3 This eligibility certification includes a review of the previously weatherized list to prevent re-weatherization.

3.2 Documentation of Eligibility

- 3.2.1 Documentation may include a pre-qualifying public assistance approval letter, a LEAP Top Sheet printed from the CEO WAP database, an Income Worksheet, a notarized income affidavit for self-employed applicants, etc. See CEO-WAP-301.



- 3.3 Permission to photograph home**
 - 3.3.1 Permission from the client must be granted in order to photograph the home for pre and post work conditions.
- 4. Lawful Presence Affidavit**
 - 4.1.1 A completed Lawful Presence Affidavit is required under certain circumstances. See CEO-WAP-301.
 - 4.1.2 Per SB 21-199: If an applicant does not have a social security number, the subgrantee will require the applicant's individual taxpayer identification number or any other government issued document verifying identity. See CEO WAP 301.
- 5. Client identification**
 - 5.1 Identification documentation may include but are not limited to:**
 - 5.1.1 A copy of a valid form of photo identification
 - 5.1.2 Colorado license (expired less than 10 years, image on file)
 - 5.1.3 Colorado ID card (expired less than 10 years, image on file)
 - 5.1.4 US passport (expired less than 10 years, image on file)
 - 5.1.5 Out of State ID from LP state (expired less than one year)
 - 5.1.6 Foreign passport w/photo, US Visa, I-94
 - 5.1.7 Valid Military ID/Common Access Card
 - 5.1.8 Certificate of Naturalization with photo less than 20 years old
 - 5.1.9 Valid I-551
 - 5.1.10 Valid EAD/ Temporary Resident
 - 5.1.11 Refugee/Asylee I-94 w/photo less than 20 years old
 - 5.1.12 Social Security Card verified by SSOLV
 - 5.1.13 U.S. birth certificate
 - 5.1.14 Certificate of Citizenship from the Department of Interior
 - 5.1.15 U.S. adoption order with birth information
 - 5.1.16 BIA ID Card with photo less than 10 years expired
 - 5.1.17 VA card with photo less than 20 years old
 - 5.1.18 Colorado Department of Corrections or Federal Bureau of Prisons ID card
 - 5.1.19 Official photo identification from applicant's country of origin
- 6. WAP Consent Form**
 - 6.1 This serves as permission from the client to enter the premises, perform work, and allow inspection by local, state, and federal officials as required. If the client is renting the home, then the owner must sign as well.
- 7. Landlord or Property Manager Consent Form**
 - 7.1 This form includes the agreement from the landlord that they will not increase rent as a result of WAP in addition to a release to allow the



installation of WAP materials and performance of energy conservation services.

8. Field Documentation and Requirements

The following field related documents are required to be completed and maintained in the client file:

8.1 Utility Data Consent Form

8.1.1 These forms may be required based on the utility provider(s). See CEO-WAP-301 A6-11.

8.2 CEO WAP Audit Form or CEO approved audit form

8.2.1 Including, but not limited to, Combustion Appliance Zone (CAZ) Summary Sheet, pre and post WAP blower door test results, and the Ventilation Calculation Form. See CEO-WAP-801.

8.3 Photos

8.3.1 Recording pre-existing conditions, work quality issues found during inspections should be contained in the file.

8.3.2 Photo documentation may be printed and placed in the client file or stored electronically (with the appropriate naming convention to identify the unit).

8.3.3 WRF photos should be clearly labeled, named, or noted as related to the WRF issue.

8.4 Results of a NEAT, MHEA, or other CEO WAP approved audits

8.4.1 The file must include:

8.4.1.1 The initial written audit

8.4.1.2 The second WA with a printed NEAT or MHEA,

8.4.1.3 Show contributions and resulting SIR, as applicable.

8.4.1.4 A copy of the NEAT/MHEA Economic Analysis Report which includes all measures installed, Health and Safety (H&S) repairs, necessary repairs, and incidental repairs.

8.4.1.5 Each client file (which includes the Salesforce record) must include documentation of the rationale for performing each H&S measure in an individual home and its relationship to the ECM that necessitated it.

8.5 Cost Records

8.5.1 Record of all measures and materials installed and documentation of contract labor costs associated with weatherizing this unit, including all related invoices, purchase orders, and a completed job audit/estimate form. See CEO-WAP-701.

8.5.2 Each client file (which includes the Salesforce record) must include documentation that separates all costs into the



- 8.6 ASHRAE 62.2 Calculation Form**
 - 8.6.1 Only required for DOE funded units.
- 8.7 Deferral & Weatherization Readiness Funds Requirements**
 - 8.7.1 When using WRF, a print out from Salesforce with all applicable information must be stored in the client file with the BWR.
 - 8.7.2 See CEO-WAP-403.
- 8.8 Call-Back and/or Go-Back Documentation**
 - 8.8.1 See CEO-WAP-903.
- 8.9 Client Complaint/Resolution Documentation**
 - 8.9.1 See CEO-WAP-305.
- 8.10 Permits**
 - 8.10.1 Any and all permits required to by any level of government or building regulatory authority for the unit must be saved in the client file.
- 8.11 Solar PV**
 - 8.11.1 See CEO-WAP-808 & 808 A1-5.
- 8.12 Beneficial Electrification**
 - 8.12.1 See CEO WAP 809
- 8.13 Utility Bill Information**
 - 8.13.1 See CEO WAP 702.
- 9. Data Entry & Salesforce**
 - 9.1 All documentation on the client application should be verified and entered correctly into Salesforce.
 - 9.2 Should the information provided on the application be incorrect it should be notated within the file, and Saleasforce and the BWR should reflect the correct information.
 - 9.2.1 It is required that subgrantee staff include the client email address in the Salesforce and the BWR if it is provided on the application.
 - 9.2.2 See CEO-WAP-701.
- 10. Standard CEO WAP Final Inspection Form**
 - 10.1.1 See CEO-WAP-902 A1.
- 11. Client Forms for Signature**
 - 11.1 Lead & Radon pamphlets receipt**
 - 11.1.1 Signed documentation that client, and landlord if the home is a rental property, received the Radon Pamphlet. CEO-WAP-802 A5-6.



- 11.1.2 Signed documentation that the client, and the landlord, if the home is a rental property, received the Renovate Right Lead Safe Pamphlet for homes built in or before 1978.
 - 11.1.2.1 In the event that a signature is not easily obtained from the landlord for either of the aforementioned packets the following will be sufficient.
 - 11.1.2.1.1. A proof of email delivery with read receipt requested
 - 11.1.2.1.2. A photo of a stamped and addressed envelope
 - 11.1.2.1.3. Receipt of certified mail
- 11.2 Health and Safety Inspection Form(s)**
 - 11.2.1 Documentation of notification to owners and clients of health or safety problems that may or may not require WAP work to be terminated or deferred. This must be signed and dated by the client and a copy left with the client.
 - 11.2.2 The H&S Inspection Form may replace the previously required Chemical Sensitivity and Mold Inspection Form, if chemical sensitivity and mold issue statements are covered in the general form.
 - 11.2.3 If these statements are not included in the H&S Inspection/ form, separate documentation of chemical sensitivities and mold issues must be included in the client file.
- 11.3 Radon Informed Consent Form**
 - 11.3.1 See CEO-WAP-802 A12-13.
- 11.4 Suspected Asbestos Material Inspection Form**
 - 11.4.1 Must be signed/dated by the client and a copy left with the client. See CEO-WAP-802 A11.
- 11.5 Refrigerator Replacement documentation**
 - 11.5.1 For jobs that receive a new refrigerator, the client file must include a documentation of delivery. See CEO-WAP-807 A1.
- 12. Additional Requirements**
 - 12.1 State waivers**
 - 12.1.1 Documentation of administrative and technical waivers granted by CEO.
 - 12.2 Agency waivers**
 - 12.2.1 Documentation of decisions and technical waivers made by the subgrantee regarding services provided or not provided.
 - 12.3 State Historic Preservation Documentation**
 - 12.3.1 For homes built 50 years ago or earlier, verification of the home's possible historically registered status is required.



12.3.2 The subgrantee staff completing the verification will sign and date on the client application after verification has been completed. See CEO-WAP-404 A4.

12.4 NEPA determination

12.4.1 As applicable. See CEO WAP 404.

12.5 Landlord contribution documentation

12.5.1 Date of the landlord's payment and contribution amount. See CEO-WAP-402.



CEO-WAP-401

All Unit & Building Eligibility

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [201](#), [301](#), [302](#), [402](#), [403](#), [901](#), [401 A1](#); [WPN 22-5](#); [10 CFR 440.22\(b\)](#),
[10 CFR 440.18iii](#)

1. Abstract

- 1.1 This policy describes the unit eligibility criteria for receiving weatherization services under Colorado Energy Office Weatherization Assistance Program (CEO WAP).
- 1.2 Eligibility is determined by re-weatherization restrictions and structure types.

2. Public Housing

- 2.1 A public housing, assisted housing, and previously delineated US Department of Agriculture (USDA), or Low-Income Housing Tax Credit (LIHTC) building qualify for WAP.

3. Manufactured Homes

- 3.1 In order to be eligible for weatherization, a manufactured home must be built on a permanent chassis with the intention to serve as a primary, stationary dwelling. See CEO-WAP-901.

4. Single Family Units

- 4.1 In order to be eligible for weatherization, a single-family unit must be occupied by an eligible household prior to the start of any weatherization activities.
- 4.2 Homes must not have received services from WAP within the last 15 years to be eligible for services.

4.3 Multifamily Buildings

- 5.1 2-4 Unit Buildings: Multi-unit buildings with fewer than 5 units.
- 5.2 Small Multifamily: Residential buildings with 5-24 units that are 3-stories or fewer.
- 5.3 Large Multifamily Buildings: Residential buildings with 25+ units or more than three stories.

5. Individual Multifamily Units

- 5.1 Individual units within multifamily buildings (2-4 unit buildings, small, and large) may be weatherized by the single-family subgrantee, if they meet the income eligibility guidelines. See 401.6.1.1 below, and CEO WAP 301.
 - 5.1.1 DOE funds may not be used.



6. Multifamily Projects

6.1 The total program funds allowed for a project is determined by taking the current per unit average, multiplied by the number of qualifying units. See CEO WAP 301.

6.1.1 2-4 Unit Buildings (duplex, triplex, and quadplex buildings), may be weatherized if 50 percent (duplexes and quadplexes) or 66 percent (triplexes) of the building occupants are eligible for weatherization.

6.1.2 Small and Large Multifamily Buildings (five or more units): 66 percent of the building occupants must be eligible in order for the entire building to be weatherized.

6.2 Small (5-24 units) and Large (25+ units) Multifamily Buildings

6.2.1 Those which are not centrally heated require subgrantees to consult with CEO WAP staff for the appropriate analysis methodology and waiver request.

6.2.2 A walk-through of the project by CEO WAP with subgrantee staff is required prior to final project approval.

6.2.3 CEO WAP staff must approve the proposed weatherization project prior to receiving weatherization services.

6.2.4 CEO WAP Staff will only approve a project if the following are documented:

6.2.4.1 It will have energy savings that meet the SIR requirements.

6.2.4.2 The number of units counted towards the subgrantee production goal will be determined by the audit and in consultation with CEO WAP staff.

6.2.4.3 The unit count will be based upon the number of major measures completed and the number of units receiving direct benefit from the measures installed.

6.3 Vacant Buildings

6.3.1 Completely vacant buildings may only be weatherized in conjunction with a federal, state, or local government program for rehabilitating the building or making similar building improvements.

6.3.2 Written assurance must be obtained that at least 66 percent of the units, or 50 percent if applicable, will be occupied by income-eligible persons within 180 days of the completion of the weatherization work.

6.3.2.1 A follow-up must also be conducted to ensure that this occurs. See CEO-WAP-301.



6.4 Partially Occupied Buildings

6.4.1 Many times, multifamily structures will have some vacant and some occupied units at the time eligibility is determined.

6.4.2 The building can be weatherized if it meets the appropriate criteria.

6.4.2.1 Vacant units are considered ineligible unless the requirements of the vacant building section are met.

6.5 Individually Heated Multifamily Units

6.5.1 In order to be eligible for weatherization, a unit within an individually heated multifamily building must be occupied by an eligible household prior to the start of any weatherization activities. WAP activities for these units may not be paid for with DOE funds. See CEO-WAP-201 & 301.

6.5.1.1 **Definition:** An individually heated multifamily unit is an individual dwelling unit within a building that contains two or more dwelling units and does not share heating equipment with any other dwelling unit.

6.5.1.2 All individually heated small and large (5+ units) multifamily projects must be approved by CEO WAP.

6.5.1.3 Individual Unit Meters: If the units are individually metered for electricity, a tenant-signed copy of the Utility Bill Release Form for each unit must be submitted..

6.6 Centrally Heated Multifamily (CHMF) Units

6.6.1 In order to be eligible for weatherization, units within a centrally heated, multifamily building must be occupied by an eligible household or meet the building qualification requirements (66% eligibility) prior to the start of any weatherization activities.

6.6.1.1 WAP activities for these CHMF units may be paid for with DOE and/or non-DOE funds. See CEO-WAP-201 & 301.

6.6.1.2 All centrally heated small and large (5+ units) multifamily projects must be approved by CEO WAP.

6.7 Multifamily Documentation Requirements

6.7.1 **Building Owner Permission:** Subgrantee is required to obtain the written permission of the owner of the building or its agent prior to proceeding with weatherization.

6.7.1.1 Subgrantees must initiate a landlord/tenant agreement to capture required elements (e.g., benefits accrue to the tenants, tenants are not subjected to rent increases due to property improvements provided by WAP, what occurs if tenants are evicted or the building is sold before a specific period of time has passed).



- 6.7.2 **Income Eligibility Documentation:** Subgrantee must collect income information on a unit-by-unit basis to ensure at least 66% (or 50% for duplexes and four-unit buildings and “certain eligible types of large multifamily” category) of the occupants in a five or more unit building are eligible for service.
- 6.7.2.1 Exception: When selecting a project from the HUD/USDA list or buildings occupied by categorically eligible households.
- 6.7.2.1.1 When a building is on one of the HUD/USDA posted lists, Subgrantees must state in the project file which list the building is on and the eligible percentage (66% to 100%) of units corresponding to that list.
- 6.7.3 **Demographics of Residents:** Subgrantees must request the building owner provide information on the collected demographics on a unit-by-unit basis.
- 6.7.3.1 Exception: When selecting a project from the HUD/USDA list or buildings occupied by categorically eligible households, rent rolls or other such building owner records provided on an entire building or project basis are sufficient documentation to meet this requirement.
- 6.7.4 **Accrual of Benefits to Tenants:** Subgrantees must establish procedures for dwellings which consist of a rental unit or rental units to ensure that the benefits of weatherization assistance in connection with such rental units, including units where tenants pay for their energy through their rent, will accrue primarily to the low income tenants residing in such units.
- 6.7.4.1 With any rental property (multifamily or not) in which the tenants do not directly pay for their own utilities, the subgrantee must demonstrate the benefits of the weatherization work accrue primarily to the low-income tenants. Benefits include, but are not limited to lower energy bills, establishment of a shared savings program, or additional investment in the property. Some benefits do not accrue to tenants if they do not pay individual utility bills.
- 6.7.5 **Audit Runs:** The WAP file for each building should contain at least the following information from the energy audit:
- 6.7.5.1 The recommended statement of work including the savings-to-investment ratios (SIRs) of each measure and the total project SIR. If any measures were bought-down or otherwise leveraged, the documentation must show the pre-leveraged SIRs of each individual measure and the pre-leveraged project SIR. The pre-leveraged Project (Cumulative) SIR must be 1.0 or greater.



- 6.7.5.1.1 Documentation must include the other sources that funded each bought-down measure.
 - 6.7.5.2 Either a printed file showing all of the building audit inputs and outputs or the immediately accessible electronic file that shows all the audit inputs and outputs. For priority list projects the file should include all pre-weatherization measurements.
 - 6.7.5.3 Final installed costs of each measure and the total project cost. If the project went through the bidding process, then all bid prices - winning and losing bids - must be in the file.
 - 6.7.5.4 All specifications defining each measure.
 - 6.7.6 **Landlord Contributions:** There are two mechanisms for landlord contributions: participation agreements that address broad Grantee requirements, and specific measure buy-downs. See WPN 22-12.
 - 6.7.7 **Lawful Presence verification:** It is required the client (property owner/manager) certifies all tenants in the building are lawfully present for any project where federal funds will be used.
 - 6.8 **Other Eligible Structures**
 - 6.8.1 Other structures are only considered eligible if they are owned by a non-profit that aligns with CEO WAP's mission of reducing poverty and/or energy burden.
 - 6.8.2 Additional documentation may be required to prove eligibility and CEO WAP may also issue specific guidance for weatherization work.
 - 6.8.3 **Group Homes and Shelters:** Group homes and shelters are eligible for weatherization services and income documentation on individual residents is not required.
 - 6.8.4 **Requirements for Group Homes and Shelters**
 - 6.8.4.1 **Group Home:** means a dwelling unit in which three or more people, not related by blood or marriage, are residing in a single unit, not owned by a government subgrantee, where eating facilities are shared. In addition, a group home must have a clearly defined identity that distinguishes it from more informal, family-type settings, for example, a residence for individuals with cognitive disorders.
 - 6.8.4.2 **Shelters:** means a dwelling unit or units whose principal purpose is to house, on a temporary basis, individuals who may or may not be related to one another within buildings which



are not nursing homes, prisons, or similar institutional care facilities.

6.8.5 Determining Dwelling Units

6.8.5.1 For the purpose of determining how many dwelling units exist, a subgrantee may count each 800 square feet or each floor of the facility as a dwelling unit.

6.8.5.2 **Eligibility** The following are examples of how to determine the eligibility, the allowable expenses, and the number of completed units for group homes. These examples illustrate that eligibility of group homes and the allowable expense for each home will be determined on a case-by-case basis.

6.9 Ineligible Structures

6.9.1 Non-Conventional Dwellings

6.9.1.1 Structures not built for permanent habitation, or not fit for permanent habitation, may not receive services with CEO WAP funds.

6.9.1.2 These types of structures include, but may not be limited to, motorhomes, buses, temporary dwelling structures, mobile tiny homes, recreational vehicles, barns, stables, chicken coops, sheds, temporary fabrications, cardboard boxes, and dumpsters.

6.9.1.3 Waivers may be submitted for unusual circumstances, through CEO WAP.

6.9.2 New Construction

6.9.2.1 New Construction or units currently under construction are not eligible for multifamily weatherization.

6.9.2.2 Eligible units must be currently or previously occupied.

6.9.3 Home for Sale

6.9.3.1 A home that is or will be put up for sale is not eligible for weatherization.

6.9.4 Re-Weatherization

6.9.4.1 Dwelling units are eligible for re-weatherization if it has been damaged by fire, flood, or force majeure and the repair of the weatherization materials is not covered by insurance. See 10 CFR 440.18.

6.9.4.2 Dwelling units are eligible for re-weatherization if they have been previously weatherized under this program or under other federal programs after a period of 15 years and therefore may receive further financial assistance for weatherization. See Public Law 116-260.



7. Small and Large Multifamily Building (5+ Units) Approval Process

7.1 A complete multifamily proposal for buildings containing five or more dwelling units, which are being considered for weatherization, must be submitted to CEO WAP staff for approval prior to initiating work.

7.1.1 A multifamily application must be used for small and large multifamily projects.

7.1.2 Small and Large multifamily buildings (5+ units)

7.1.2.1 All subgrantees submitting 5+ units multifamily projects for approval must use the “WAP Multifamily Submittal Checklist” provided by DOE, which provides guidance on required documentation, for both centrally and individually heated projects.

7.1.2.2 Detailed administrative and technical requirements are provided in the checklist. See CEO WAP 401 A2.

7.1.3 2/3/4-plexes (1-4 unit buildings)

7.1.3.1 The weatherization of multifamily structures that contain four housing units or fewer is allowed provided a CEO WAP approved energy audit is conducted (using an audit applicable to the structure).

7.1.3.2 A “WAP Multifamily Submittal Checklist” is not required for these types of buildings.

7.2 The submission or proposal must include the following:

7.2.1 Client intake and qualification documentation for the appropriate number of clients.

7.2.2 A thorough assessment of the entire building shell.

7.2.3 An efficiency assessment of the space and water heating systems.

7.2.4 An assessment of the electric base load and potential base load measures.

7.2.5 An assessment of the cooling load and potential cooling load measures.

7.2.6 An engineer’s evaluation may be used to determine heating, and cooling loads, and to make a recommendation for improved energy savings; with prior approval from CEO WAP staff.

7.2.7 Documentation of utility consumption data for a one year minimum pre-weatherization.

7.2.8 A prioritized list of measures based on an appropriate computerized energy audit or other approved approach.

7.2.9 The total number of units to be considered.

7.2.10 An estimate of material and on-site labor costs for the project, and an estimate of the subgrantee’s material and on-site labor average



7.2.11 A breakdown of the subgrantee and owner financial participation in the cost of the proposed project.

7.3 Plans for tracking utility consumption data for a one year minimum post-weatherization for analysis.

7.4 Blower door readings are not required for multifamily buildings.

7.4.1 Air leakage work should be performed if a visual assessment of the building shell indicates that there is significant heat loss due to air leakage.

8. Building Staff Training

8.1 Training for maintenance staff should be provided if major work is to be done on the heating or cooling system, and/or there are a significant amount of repairs that are necessary.

9. Reporting Criteria for all Units

9.1 Reporting Criteria

9.1.1 The re-weatherized units are counted as completed units against the contracted production goal.

9.1.2 All units that are re-weatherized must be reported in the CEO WAP Database.

9.1.2.1 All units that received services due to damage caused by a force majeure shall indicate so in the database.

9.1.3 Both Individually Heated Multifamily (IHMF) units and Centrally Heated Multifamily (CHMF) units will be reported in Salesforce once the project is completed.



COLORADO

Energy Office

Weatherization Assistance Program

CEO-WAP-402

Landlord Agreements & Contributions

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [301](#), [502](#), [701](#), [301 A1a-A2c](#), [402 A1-A3](#); [10 CFR 440.22\(d\)](#)

1. Abstract

1.1 This policy establishes Colorado Energy Office Weatherization Assistance Program's (CEO WAP) position along with DOE requirements regarding landlord agreements, rent increases, rent increase complaints, and financial participation.

1.2 Landlord contributions may be asked of from every landlord, but are only required for multifamily buildings, including duplexes, triplexes, quadplexes, and 5+ buildings.

2. Owner/Authorized Agent, Tenant, and Subgrantee Agreements (OTAA)

When using CEO WAP funds to weatherize any rental property, subgrantee must ensure that the following requirements are met:

2.1 Rents

Rents must not be raised due to the weatherization upgrades provided through CEO WAP, and that a procedure exists to enforce this requirement.

2.1.1 No undue or excessive enhancement will occur to the value of the dwelling units.

2.1.2 The investment in the building is secured against sale and the unlawful eviction of tenants.

2.1.3 The benefits of the weatherization will accrue primarily to eligible tenants.

2.2 Signed Agreements

2.2.1 To ensure compliance with these requirements, CEO WAP subgrantees are required to have the owner/authorized agent and the tenant sign an agreement, which describes the terms under which the weatherization work will be done. See CEO-WAP-301 A1 & 402 A1.

2.3 Permission of Owner or Authorized Agent

1.2.1.1 Written permission of the owner/authorized agent must be obtained first.



- 1.2.1.2 Records must be kept of all contacts with the tenants and the owner.
- 1.2.1.3 The owner shall be presented with documentation, or a

2.4 Agreement Development

- 2.4.1 Subgrantees are required to provide the tenant with a synopsis of the provisions contained in the agreement.

2.4.2 Rent Increases

Weatherization program requirements stipulate that "For a reasonable period of time after weatherization work has been completed... the tenants in that unit (including households paying for their energy through their rent) will not be subjected to rent increases unless those increases are demonstrably related to matters other than the weatherization work performed."

2.4.3 Client Complaints

- 2.4.3.1 In addition, it is required that "the enforcement of the preceding section is provided through procedures established at the State level, by which tenants may file complaints.

- 2.4.3.2 Additionally, owners, in response to such complaints, shall demonstrate that the rent increase concerned is related to matters other than the weatherization work performed."

2.4.4 Subgrantee Procedure for Client Complaints

- 2.4.4.1 A subgrantee's procedure for addressing client initiated complaints regarding undue rent increases must follow this basic process:

- 2.4.4.2 If a tenant, in good faith, believes that their rent is being increased solely because of the weatherization work performed, the tenant may then file, within a reasonable time, a written complaint to the subgrantee.

- 2.4.4.3 Upon receipt of this complaint, if the subgrantee believes there is cause, the subgrantee will forward such complaint to the owner/authorized agent.

2.4.5 Subgrantee/Owner Agreement Rent Increase Violation

- 2.4.5.1 If a subgrantee determines that a rent increase in fact violates the owner agreement and the owner/authorized agent refuses to rescind the increase, the subgrantee is not required to seek a remedy on behalf of the tenant in court.



2.4.6 Subgrantee Legal Action

2.4.6.1 Though subgrantees are not required to take Legal action on behalf of a tenant when an owner/authorized agent demands an unjustified rent increase, subgrantees should take some appropriate action as a consequence against the owner/authorized agent. Such actions are probably limited to only penalties the subgrantee itself can enforce.

2.4.7 Undue or Excessive Enhancement

2.4.7.1 The provision of services that are not directly related to cost-effective energy savings or the health and safety of the client are generally considered to be undue enhancement.

2.4.7.2 The provision of even a moderate amount of weatherization service to an owner/authorized agent who is not income eligible for weatherization, without an investment by them in support of the weatherization activities and/or with no direct benefit to the client would also be considered as "undue or excessive enhancement".

2.4.7.3 There are certainly other situations, which could be defined as "undue or excessive enhancement". Therefore, it is up to WAP staff to evaluate the situation and make a determination.

2.4.7.4 Specific provisions within the owner agreement, which spell out the time frames in which rents may not be raised or provisions in which rents are reduced, are one way to satisfy the requirements.

2.4.8 Securing the Weatherization Investment

2.4.8.1 The third requirement is "to secure the federal investment made under this part [ie. weatherizing rental property] and address the issues of eviction from and sale of property receiving weatherization materials under this part, States may seek owner/authorized agent agreement to placement of a lien or to other contractual restrictions."

2.4.9 While the Federal guidelines specifically mention liens as a method of securing the federal investment against the deliberate eviction of a tenant and the sale of a weatherized property by an owner/authorized agent seeking to appropriate for themselves the benefits of weatherization, CEO WAP has determined that clauses mentioned in the owner agreement are a more reasonable approach. Therefore, the practice of placing liens against rental properties is allowable, but is not required.



- 2.4.9.1 The practice of placing liens against rental units may become a public relations problem if eligible owners choose not to participate if their buildings will have liens attached.
- 2.4.9.2 As security against the deliberate eviction of a tenant and the sale of the building (or of any individual unit in the building), the owner agreement requires the owner/authorized agent to rebate, to the subgrantee, the cost of the weatherization work attributed to the tenant, the unit or the building in question; or to bind the new owner to the terms of the owner agreement for its duration.
- 2.4.9.3 Unlike cases of tenant complaints about rent increases, DOE regulations place no requirements on establishing procedures for addressing complaints or disputes concerning eviction or property sale.
- 2.4.9.4 Though subgrantees are a party to the owner agreement, subgrantees are not required to resolve or arbitrate such complaints. These complaints may be best handled by a legal service.
- 2.4.9.5 **Benefits to the Tenant:** The final DOE requirement is that "the benefits of the weatherization accrue primarily to tenants". The concern has been that by providing services to renters, owner/authorized agents would benefit from the weatherization services.. See CEO-WAP-402 A2.
- 2.4.9.6 If the tenant pays directly for the utility electricity costs, then the tenant benefits directly from electric base and cooling load weatherization measures through reduced energy costs.
- 2.4.9.7 Where heating fuel costs are paid through the rent, the owner/authorized agent will receive the benefit of weatherization services through reduced energy costs. Thus, subgrantees must look for a means of assuring a direct benefit to the income-eligible tenant(s).
- 2.4.9.8 One method for providing benefits directly to clients is to include a requirement for tracking utility costs and then reducing the tenant's rent by an equal proportion.

3. Working with Owner/Authorized Agents

- 3.1 If the subgrantee is experiencing difficulty in getting owner/authorized agents to permit weatherization of their buildings:



- 3.1.1 Defer work until the owner/authorized agent agrees to the terms of the owner agreement.
 - 3.1.2 Allow the owner/authorized agent to obtain bids for the specified work.
 - 3.1.2.1 Whichever method you choose should demonstrate to the owner/authorized agent the subgrantee's willingness to cooperate and work in the best interest of all parties involved.
 4. **Implementation, Monitoring, and Enforcement of Agreements**
 - 4.1 The owner agreement must be signed by the owner/authorized agent, the tenant, and a representative of the subgrantee because they each have responsibilities under the agreement.
 - 4.2 The owner/authorized agent is responsible for complying with all the conditions of the contract that concern ownership of the unit.
 - 4.3 **Landlord Agreements and Rent Increases**
 - 4.3.1 It is the responsibility of the subgrantee to establish a procedure for assuring that rents shall not be increased because of the increased value of the dwelling units that CEO WAP has provided.
 - 4.3.2 CEO WAP has prepared a Landlord Permission Form which includes a statement that there may be no rent increase on the unit due to the increased value WAP provides.
 - 4.3.3 The Landlord Permission Form is to be signed by the landlord or an authorized agent and retained in each client file in a rental living situation. This agreement must be completed before approving the client's application. See CEO-WAP-301 A1.
 - 4.4 **Conditions of Agreement Responsibility**
 - 4.4.1 The subgrantee is responsible for providing weatherization assistance under the conditions of the agreement. The tenant should sign to show that they understand the terms of the agreement and will abide by the clauses that concern tenant responsibilities. Tenants provide the "monitoring" of the owner/authorized agent/tenant agreement. As a practical matter, it is not feasible for the local subgrantee to keep track of all such agreements. The synopsis of the agreement is an effective way to ensure proper understanding of the agreement. If the agreement is violated by the owner/authorized agent, the tenant's best recourse is through a legal services subgrantee. However, keep in mind the role in addressing rent increase disputes.
 5. **Methods of Payment**
 - 5.1 Landlord contributions may not be paid in cash.



- 5.2 Subgrantees must follow their internal procedure for the handling of funds to ensure the separation of duties.
- 5.3 **File Documentation**
 - 5.3.1 All contributions from the landlord must be tracked and recorded in the client file.
 - 5.3.2 Copies of the landlord contributions must be included in the client file along with the landlord agreement.
- 5.4 **Reporting**
 - 5.4.1 The landlord contribution is to be included in Salesforce under the “Landlord Contribution” field.
 - 5.4.1.1 When reporting materials and labor covered by the contribution, the amount reported should be the total cost; net cost is not to be used. See policy CEO-WAP-701.
- 6. **Landlord Financial Contribution for Multifamily Units**
 - 6.1 CEO WAP has established a landlord contribution structure for individually heated multifamily and centrally heated multifamily buildings.
 - 6.1.1 Such financial participation is not to be considered as program income.
 - 6.1.2 Subgrantees will also be allowed to protect the federal investment in rental property by placement of liens or other contractual restrictions.
 - 6.2 **Individually Heated (IHMF) and Centrally Heated Multifamily (CHMF)**
 - 6.2.1 Landlord contributions are required for each project and are to be documented in the landlord/subgrantee agreement.
 - 6.2.1.1 Each project’s total SIR must be at 1.0 or greater prior to applying landlord contributions unless a waiver is obtained.
 - 6.2.2 Landlord contributions may be used to buy up an Energy Conservation measure SIR to meet the 1.0 or greater requirement for Energy Conservation Measures.
 - 6.2.3 A Waiver request must be submitted and approved by CEO prior to applying the Landlord contribution.
 - 6.3 **Non-cash Contributions**
 - 6.3.1 CEO WAP will accept other forms of contributions to offset the required owner contribution including: sweat equity, in-kind staff support, and remediation of issues that would improve the effectiveness of WAP and/or directly improve occupant health and safety.
 - 6.3.2 The subgrantee agency must request approval for non-cash contributions by submitting an email to a CEO WAP Program



Manager that identifies the subgrantee’s internal policy and how this request aligns with that policy, the method of non-cash contribution, and the cost justification.

6.4 Individually Heated Multifamily

6.4.1 Individually Heated Multifamily (IHMF) projects are to follow the Energy Conservation (EC) Furnace, Refrigerator, and Health and Safety (HS) Furnace requirements as detailed below.

6.5 Summary of Landlord Contributions Table

<u>Measure</u>	<u>IHMF</u>	<u>CHMF</u>
EC Heating System	50% of materials and labor used to calculate SIR	50% of materials and labor
Refrigerator	50% of materials and labor	50% of materials and labor
HS Heating System	50% of materials and labor	50% of materials and labor
Fuel Conversions	50% of materials and labor	N/A
EC Windows	50% of materials and labor	50% of materials and labor
HS Multifamily	N/A	50% of materials and labor
Deferred Maintenance	100% landlord responsibility	100% landlord responsibility

7. Accounting for and Using Owner/Authorized Agent Contribution

7.1 The landlord should be made aware of their possible financial responsibility before the energy auditor visits the multifamily building.

7.2 The financial responsibility of the landlord should be thought of as “an investment within their own building”.

7.3 Owner/authorized agent contributions are not program income, but they must be tracked.

7.4 The funds contributed by the owner/authorized agent must be spent according to the terms of the agreement between the owner/authorized agent and the subgrantee.

7.5 For buildings where an owner/authorized agent investment is required, the investment must be used to reduce the cost of the weatherization activity or remediation of the health and safety problem.

7.6 Voluntary Investments

7.6.1 Voluntary investments received from other owner/authorized agents must also be used in support of the weatherization activity



or remediation of the health and safety problem of the building, and must be properly tracked.

7.6.2 Potential uses include, but are not limited to, the following:

7.6.2.1 Providing temporary heat for a customer until a heating unit can be repaired or replaced.

7.6.2.2 Performing repair work.

7.6.2.3 Purchasing and distributing consumer education materials to eligible clients.

7.6.2.4 Providing other conservation materials or health and safety measures.

7.6.2.5 Supplementing the CEO WAP labor dollars.

7.6.2.6 Supplementing the CEO WAP materials dollars.

7.7 Health and Safety Investment

7.7.1 Investments to alleviate an existing health and safety problem; a required investment that must be applied to the applied job.

7.7.2 All combustion heating appliances (within eligible and ineligible units) must be tested for safety.

7.7.3 When work is going to be performed on or in ineligible units and common areas, all space heating combustion appliances within eligible units, ineligible units, vacant units, and common areas must be tested for combustion safety.

7.7.4 If deferred maintenance is found, the landlord must pay 100 percent of the material and labor cost to abate the health and safety problems.

7.7.4.1 All health and safety work done must pass final inspection before any weatherization work takes place.

7.8 Utilities Included in Rent Investments

7.8.1 The weatherization of a multifamily building with five or more units, where the utilities/fuel costs are included in the rent, do require investment by the landlord or owner that must be applied to the weatherization job.

7.8.2 If the fuel utility costs are included within the rent or if the multifamily building is master-metered, the tenant may not directly receive the benefit of the weatherization performed on the building. In other words, the utility costs may decrease due to the weatherization activities having been performed, but the tenants' rent may not decrease.

7.8.3 In all instances where the utility costs are included within the rent and the landlord is not income eligible for the Weatherization service or currently receiving LEAP, the landlord



investment must equal 50 percent of the appliance cost to have the building weatherized.

7.8.4 It becomes very important for the CEO WAP to have an accurate energy audit and detailed work-order for this type of investment situation. The information collected will be critical during the negotiations with the landlord/owner/authorized agent in reference to their “investment” dollar amount.

7.8.5 Form of Payment by Landlord: The investment can take the form of cash or an in-kind contribution that benefits the tenant. The owner/authorized agent should be given a choice. In-kind contributions are items such as:

7.8.5.1 Rent rebates to the tenant

7.8.5.2 Rent reduction to tenants

7.8.5.3 Repairs that will allow energy conservation work to be performed within a one year period prior to the weatherization activities.

7.9 Energy Conservation Investment Requirements

7.9.1 Individually Heated Multifamily (IHMF) projects are to follow the Energy Conservation (EC) Furnace, Refrigerator, and Health and Safety (HS) Furnace requirements as detailed below.

7.9.1.1 IEC Heating System: The landlord contribution is 50% of the total materials and labor amounts used to calculate the SIR. Should the landlord choose not to contribute, only measures with a higher SIR may be installed. All measures below the skipped measure may not be installed. Installation of measures below the skipped measure may result in disallowed costs for that, or all job measures. With only one chance to weatherize a unit, a better energy saving course of action will wait until the landlord agrees to contribute to the measure. Subgrantees should emphasize with the landlord that the furnace replacement is a one-time offer until the unit becomes eligible under DOE re-weatherization rules. The measure must meet an SIR of 1.0 or greater prior to applying landlord contributions unless a waiver is obtained. Only qualifying utility rebates can be used to buy down a measure. Landlord contributions cannot be used to buy down a measure.

7.9.1.2 EC Refrigerator: The landlord contribution is 50% of the delivered cost. Should the landlord choose not to contribute, all other qualifying measures past that point on



the NEAT/MHEA Recommended Measures report cannot be installed. The preference from both CEO WAP and the DOE is that the unit be deferred. With only one chance to weatherize a unit, a better energy saving course of action is waiting until the landlord agrees to contribute to the measure. Subgrantees should emphasize with the landlord that the refrigerator replacement is a one-time offer until the unit becomes eligible under DOE re-weatherization rules. The measure must meet an SIR of 1.0 or greater prior to applying landlord contributions unless a waiver is obtained. Landlord contributions cannot be used to buy down a measure.

7.9.1.3 HS Heating System: The landlord contribution is 50% of the total materials and labor amounts that would be used to calculate an SIR. If this replacement is receiving a CIP contribution, then the landlord contribution would be the net amount. Should the landlord choose not to contribute, the unit is to be deferred until the health and safety situation has been repaired satisfactorily to continue with WAP measures. Proceeding with WAP measures may worsen the situation.

**For example: \$3,000 Labor & Materials minus \$1,800 CIP contribution equals \$1,200. 50% of \$1,200 equals \$600 landlord required contribution.*

7.9.1.4 Fuel Conversions: In the case of a fuel conversion (electric to natural gas), the landlord contribution is 50% of the total materials and labor amounts. If this conversion is receiving assistance from utilities, then the landlord contribution would be the net amount. Should the landlord choose not to contribute, the corresponding measures are to be skipped.

7.9.1.5 EC Windows: If windows meet the SIR requirement of 1.0 or greater, the landlord contribution is 50% of the total materials and labor unless a waiver is obtained.

7.10 Supplemental Investment

7.10.1 CEO WAP subgrantees are strongly encouraged to solicit contributions from all owners/authorized agents as a means of leveraging funds to supplement CEO WAP.

7.10.2 Subgrantees who wish to pursue this option must develop policies, which ensure that:



- 7.10.2.1 The procedures for eliciting owner/authorized agent contributions are not mandatory for owner/authorized agents who cannot afford to participate.
- 7.10.2.2 The level of the owner/authorized agent contribution will not act as a deterrent for a significant number of owner/authorized agents.
- 7.10.2.3 The owner/authorized agent has a clear understanding of how the voluntary contribution will be used by the subgrantee.



CEO-WAP-403

Deferrals

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [802](#), [802 A2-A3](#); [WPN 22-6](#), [WPN 23-4](#)

1. Abstract

1.1 This policy describes the situations which are beyond the scope of work for Colorado Energy Office Weatherization Assistance Program (CEO WAP) and conditions that would allow for subgrantees to deny service, until conditions were to change due to mitigation initiated and completed by sources outside of Colorado WAP or those mitigated with Weatherization Readiness Funds (WRF), as well as the found requirements for deferring a unit.

2. Deferral

2.1 Defined as the decision of a subgrantee to not provide weatherization services to a unit due to health, safety, or administrative reasons, until the situation is rectified.

3. Health and Safety

3.1 Situations which constitute a threat to the health and safety of subgrantee staff and/or WAP clients should be avoided until such time as the unsafe conditions are remedied.

3.2 Subgrantee staff who choose to work on a unit that could, or should be a deferral, do so at their own risk; however, putting occupants at further risk as a result of doing the work is never allowable.

3.3 CEO WAP does not require, expect, or encourage subgrantee crews to work in unsafe or unhealthy conditions.

4. Deferral Requirements

4.1 Subgrantees who wish to classify a unit as a deferral must include documentation with specific details related to the deferral to be recorded in Salesforce and the client file. Please see below:

4.1.1 All subgrantees are required to have a written deferral procedure that records pertinent information including: client information, job number, stated problem, root cause of the situation, and potential resolution.

4.1.2 Any substantiating evidence, such as photos, staff written comments, defective materials, additional costs, etc. should be included.



- 4.2 This deferral procedure must include notifying the client of the deferral with specific data outlined below.
- 4.3 Requirements of Notification of Deferral:
 - 4.3.1 When the subgrantee defers a unit, the decision must be shared with the client in writing (via letter) after informing them in person, if possible, including but not limited to:
 - 4.3.1.1 Date(s) of the audit/assessment.
 - 4.3.1.2 Date of deferral
 - 4.3.1.3 A description of the issues that caused the deferral.
 - 4.3.1.4 A description of the conditions under which WAP work could continue.
 - 4.3.1.5 A clear description of the responsibilities of all parties involved.
 - 4.3.1.6 Date information and notification was sent to the client regarding their deferral.
 - 4.3.1.7 Client's signature which indicates that they have been informed of their rights/options and that they understand the issues and their potential responsibilities.
 - 4.3.2 This record must be stored in the client file for the duration of required record keeping.
 - 4.3.3 This letter of notification should also include information on how the client may appeal this decision.
5. **Appeal Process**
 - 5.1 The following process will be used should a client request an appeal or second opinion on a deferral.
 - 5.1.1 The client will submit a written appeal to the direct supervisor of the subgrantee staff member who determined the unit should be deferred.
 - 5.1.2 If the deferral is upheld by their direct supervisor, the client may submit a written appeal to a CEO WAP Program Manager.
 - 5.1.3 If the deferral is upheld by a CEO WAP Program Manager, the client may submit a written appeal to the CEO WAP Director.
 - 5.1.4 The decision rendered by the CEO WAP Director is considered final and no further appeals are allowed.
 - 5.1.5 If at any point in this process, the original deferral is either not upheld, or the conditions that caused the initial deferral are mediated, the subgrantee is required to return the unit and complete all work.



6. Deferral Conditions

6.1 Client/Access Issues

Issues due to the action of a client or access to their home that would result in the deferral of a unit may include, but are not limited to:

- 6.1.1 The client, or other household member, has known health conditions that prohibit the installation of insulation materials or other weatherization materials.
- 6.1.2 The client is uncooperative, abusive, hostile, or threatening to the crew, subcontractors, auditors, inspectors, or others who must work on or visit the home or whom.
- 6.1.3 This is based upon the judgment of the senior staff person in the field who has determined that the working conditions are intolerable for workers.
- 6.1.4 Client cannot be reached at telephone number on file due to service being disconnected or due to client unavailability and follow up mail goes unanswered.
- 6.1.5 Client refuses to allow energy auditor(s) access to all areas of the home necessary to conduct the comprehensive energy audit.
- 6.1.6 Presence of animals which pose a risk to the weatherization workers. The work may be deferred until such animal threats have been secured adequately so that they no longer pose a threat.
- 6.1.7 Unable to gain access to the area to perform the work. The work may be deferred until the blocked access is cleared to allow the necessary access to perform the work.
- 6.1.8 Any illegal activity is found to occur in the unit.

6.2 Client Change of Residence:

- 6.2.1 If an eligible client moves during the course of CEO WAP work, the subgrantee will complete the repair and/or conservation work already in progress and any other measures necessary to secure the well-being of future occupants, the structure, and the installed conservation materials.
- 6.2.2 However, additional conservation or repair work is not to be started. If circumstances prevent measures from being completed, a waiver must be filled out and the document placed in the client file.
- 6.2.3 If a client shows evidence of moving or being sold of the home/unit while applying for WAP or throughout the process the job must be deferred.

6.3 Human Health Issues

Human health issues that would result in the automatic deferral of a unit may include, but are not limited to:



- 6.3.1 The house has raw sewage, atypical presence of animal feces, or other sanitation problems that would further endanger the client and weatherization crews if the weatherization work were performed.
 - 6.3.2 The house has been condemned or electrical, heating, plumbing, or other equipment has been “red tagged” by local, county, or state building officials or utilities due to safety or code issues.
 - 6.3.3 Dangerous conditions exist due to high carbon monoxide levels associated with combustion appliances that cannot be resolved under existing health and safety measures and guidance.
 - 6.3.4 The extent and condition of lead-based paint in the house would potentially create increased health and safety hazards for both the occupants and crew members.
 - 6.3.5 Volatile organic compounds (VOC) and other chemicals on the premises are poorly stored which represent a health risk (via breathing or skin contact) to the workers or client’s safety.
 - 6.3.6 In the judgment of the energy auditor, if any condition exists which may endanger the health and/or safety of the work crew or subcontractor, the work should not proceed until the identified condition is satisfactorily corrected.
- 6.4 Combustion Appliance Issues**
- Issues with combustion appliances that would result in the automatic deferral of a unit may include, but are not limited to:
- 6.4.1 Any open combustion heating systems situated in a bedroom, bathroom, or closet that cannot be replaced under CEO WAP guidelines. This includes all rooms which are used or designed to be used as a bedroom or any enclosed space that has access only through such a room. See CEO-WAP-802.
 - 6.4.2 Combustion systems that are operating in an unsafe manner and cannot be repaired or replaced within the scope of the program.
 - 6.4.3 Furnaces that have no cold air return and no easy place to install one.
 - 6.4.4 Furnaces that have no service access. Examples include, but are not limited to, attic furnaces with access doors which crew cannot enter through or furnaces where the client has finished the room around the unit but did not allow enough room to get to the controls and vents. Such situations should be discussed with supervisory subgrantee staff.
 - 6.4.5 Mobile homes with non-mobile home type furnaces. This includes all furnaces that are added to the unit.



- 6.4.6 Furnaces with no cold air return or hot air delivery system (ductwork). Typically this type of installation is in the middle of a room with limited ductwork. It is particularly important if it has a delivery from or return to the unit but not both.
 - 6.4.7 Portable heaters may be left as long as they are not the primary heat sources; these types of secondary heaters do not have to vent directly outside. Any unvented heater, including all types of unvented heaters, portable kerosene space heaters or freestanding gas and propane heaters, may result in a deferral. Work should only be done at the home if the portable heater can be permanently disabled or vented directly outside (with client/owner permission). See CEO WAP 802.
 - 6.4.8 Any furnace that is installed in a dangerous manner, or cannot be brought to code. Examples: units installed in an area where it could easily be broken.
 - 6.4.9 Combustion appliance situations that threaten client safety are of great concern to CEO WAP. **Attempts should be made to remedy the situation, rather than deferring the unit.** Contact CEO WAP staff for guidance on these specific situations.
- 6.5 Structural Issues**
- Issues with the structural integrity of the building that would result in the automatic deferral of a unit may include, but are not limited to:
- 6.5.1 The building structure or its mechanical systems, including electrical and plumbing, are in such a state of disrepair that failure is imminent and the conditions cannot be resolved cost effectively or within the scope of WAP guidance.
 - 6.5.2 If the house is structurally in a condition that is unsafe or beyond repair (the home needs significant rehabilitation work from another funding source) and presents a risk to the worker or client safety.
 - 6.5.3 A foundation that is not sound and will not support one or more of the walls.
 - 6.5.4 A unit that is under renovation or where original construction is incomplete and completion will require more than one sheet of drywall material. There is the possibility of coordinating weatherization with renovation/rehabilitation work underway; this is a judgment call of the subgrantee, considering all relevant factors (timetable for work being done and the likelihood of it occurring; option of waiting until work is done before weatherization, etc.).



- 6.5.5 Structurally unsound walls where a substantial part of a wall is unstable and that wall is involved in one or more of the desired energy conservation measures for the home; consult an approved computer audit, supervisor, or CEO staff.
- 6.5.6 If structural integrity issues are found, and the unit is deferred, the subgrantee organization should supply both education on how the issues may be resolved, as well as information and referrals to businesses with the ability to repair the found issues.
- 6.6 Electrical Issues**

Issues with electrical wiring that would result in the automatic deferral of a unit may include, but are not limited to:

 - 6.6.1 Major electrical problems where a major portion of the total electrical system appears to be questionable; as defined by experts in the field and an approved computer audit.
 - 6.6.2 There are major electrical problems where measures are not cost
- 6.7 Miscellaneous Issues**

Other concerns that would result in the automatic deferral of a unit may include, but are not limited to:

 - 6.7.1 Moisture problems that are so severe they cannot be resolved under existing health and safety measures or as incidental minor repairs. This includes standing water in the crawl space or any other source that is beyond the scope of the program to resolve.
 - 6.7.2 Friable asbestos or vermiculite in the home or significant enough in various locations that it precludes performing a majority of the most cost effective energy conservation work.
 - 6.7.3 If a mold condition is discovered during the initial audit of the home by an energy auditor and cannot be adequately addressed by the weatherization crew. CEO WAP and subgrantees shall distribute the pamphlet from the U.S. Environmental Protection Agency (EPA), Indoor Environment Division, (IED), “A Brief Guide to Mold, Moisture, and Your Home”, to clients whose homes have a moisture and/or mold problem. See CEO-WAP-802 A2.
 - 6.7.4 The area is slated to be redeveloped (highway development, economic development, flood area).
 - 6.7.5 Structural, electrical, combustion appliances, or human health issues that are so severe they cannot be resolved under existing health and safety measures or as incidental minor repairs.
 - 6.7.5.1 Any issue that causes the need to skip a major measure, such as building shell insulation or heating system replacement.



6.8 Beyond the Scope Repairs

- 6.8.1 When problems are found in homes that are beyond the scope of CEO WAP, such as hazards or high-cost repairs not associated with measures, the client and homeowner must be notified and referred to alternative resources (i.e., HUD or DOA rehabilitation programs, landlords, LEAP-CIP, etc.).
- 6.8.2 A copy of this documentation must be retained in the client file. Weatherization must not proceed until problems that would affect either CEO WAP measures or the health and safety of the client, and are beyond the scope of the program, are remedied with non-CEO WAP funds.

7. Removing Deferral Status

- 7.1 A deferral status may be removed if the conditions which warranted the deferral are addressed or a client appeal is granted by CEO WAP.
- 7.2 Once the subgrantee verifies that the conditions have been remedied, they are required to return to the unit and complete all work.
- 7.3 When weatherization Readiness Funds (WRF) are used.

8. Weatherization Readiness Funds (WRF)

- 8.1 It is required that subgrantee offices email their Program Manager (PM) the first five times AND any unique situations thereafter, when they plan to use WRF to discuss the process, allowable measures, and reporting, and to get approval before commencing WRF work.
- 8.2 Each job may receive up to \$12,000 of DOE WRF and \$12,000 of LEAP WRF to mitigate deferrals (\$24,000 total).
 - 8.2.1 DOE WRF may only be used on DOE Formula or DOE BIL jobs. DOE WRF may only be used if the unit results in a DOE completion, which is defined as: “A dwelling on which a DOE-approved energy audit or priority list has been applied and weatherization work has been completed.”
 - 8.2.2 LEAP WRF may only be used if there are LEAP Ops funds on the job.
 - 8.2.2.1 Both DOE and LEAP WRF may be used, provided there are both DOE (Formula or BIL) Ops and LEAP Ops on the job.
- 8.3 SHPO and NEPA review must be completed before WRF are used, if applicable.
 - 8.3.1 All Registered Historic Properties, or protected spaces, must be evaluated before irreversible actions are taken. See CEO WAP 404.
 - 8.3.2 A CEO WAP Staff member must be consulted and give approval if any hazardous substances are to be mitigated. See CEO WAP 404.



- 8.3.2.1 An Environmental Survey may need to be completed before approval is rendered.
- 8.4 Allowable measures under WRF include, but are not limited to, the following:**
 - 8.4.1 Asbestos remediation
 - 8.4.2 Mold and moisture remediation
 - 8.4.3 Health & Safety issues which are beyond the scope of traditional weatherization work
 - 8.4.4 Ceiling, wall, and floor repairs
 - 8.4.5 Roof repairs
 - 8.4.6 Exterior drainage repairs
 - 8.4.7 Plumbing repairs
 - 8.4.8 Electrical repairs
 - 8.4.9 Infestation mitigation
- 8.5 Deferral information will be tracked in the CEO WAP Salesforce database for each unit.**
 - 8.5.1 Change job status in Salesforce from “Audit Completed” to “WRF Deferral.” Once WRF is resolved, update the “Date Resolved” and change the job status to “Work in Progress.”
 - 8.5.2 WRF may be used more than once on a job, provided:
 - 8.5.2.1 Both instances would cause a deferral of the job, not just a measure
 - 8.5.2.2 The WRF limit is not exceeded on the job.
 - 8.5.2.3 With the use of DOE WRF, if the job carries over to a new program year, the WRF limit must correlate with the program year in which the first WRF measures began.
 - 8.5.2.4 Each WRF used must be entered as its own separate WRF Deferral measure on the job.
- 8.6 Jobs with WRF attached to them may carry over to the following Program Year as long as the job is completed by the end of the grant cycle.**
- 8.7 CEO WAP will not permit any following repairs, mitigation, or remediation with WRF:**
 - 8.7.1 Repairs which may be completed as a Health and Safety or Incidental Repair Measure (IRM)
 - 8.7.1.1 Measures must be run as IRM before being assessed for WRF
 - 8.7.2 Measures that meet the SIR of 1.0 or greater
 - 8.7.3 Measures that may be completed with other funding within the scope of weatherization
 - 8.7.4 Any other measures unless evaluated and approved in writing by CEO WAP
- 8.8 The following data will be tracked in the CEO WAP Salesforce database for each building and unit:**
 - 8.8.1 Stage Deferred



- 8.8.2 Date Deferred
- 8.8.3 Referred to (eg.: subcontractor)
- 8.8.4 Description
- 8.8.5 Issue or Action Needed
- 8.8.6 Underlying Problem
- 8.8.7 Location in the Home
- 8.8.8 Specific Actions Taken
- 8.8.9 Other Deferral Issue (if applicable)
- 8.8.10 More Detail for Deferral (if applicable)
- 8.8.11 Date Resolved (when issue was resolved; this is NOT the job closed date)
- 8.8.12 Deferral Costs and Funding
- 8.9 Compliance with WRF regulations will be reviewed in conjunction with each annual monitoring performed by both the Administrative Monitoring Team.**
 - 8.9.1 All WRF requirements outlined in WPN 22-6 will be verified by CEO WAP staff.
 - 8.9.2 These will be verified on the Annual Client File Monitoring Checklist, which is completed by CEO WAP staff at each Administrative Monitoring visit. The following checklist items need to be included in the client file and/or Salesforce:
 - 8.9.2.1 All WRF Deferral information listed in section 8.8 above
 - 8.9.2.2 Changes in Job Status (e.g.: Audit Completed > WRF Deferral > Work in Progress > Closed)
 - 8.9.2.3 Picture Documentation of pre and post WRF work clearly labeled
 - 8.9.2.4 Deferral costs and supporting documentation (eg.: subcontractor quotes)



CEO-WAP-404

Historic & Environmental Preservation

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [404 A1](#), [404 A2](#), [404 A3](#), [404 A4](#), [404 A5](#), [404 A6](#), [404 A7](#), [404 A8](#);
[36 CFR 68](#), [36 CFR 800](#)

1. Abstract

1.1 This policy outlines the requirements for weatherizing historic properties within the State of Colorado per the Programmatic Agreement (PA) between the Department Of Energy (DOE), Colorado Energy Office Weatherization Assistance Program (CEO WAP), and Colorado State Historic Preservation Office (SHPO).

1.2 This policy additionally notes the National Environmental Policy Act (NEPA) requirements for reviewing the environmental impacts weatherization services may have.

2. The Historic Programmatic Agreement

2.1 The Programmatic Agreement (PA) outlines weatherization exemptions to and requirements for the full historic review process.

2.2 Subgrantees are required to follow the process outlined in the PA and summarized in this policy. Please note that the PA is also CEO-WAP-404 A1.

3. Identifying Historic Properties

This policy applies only to properties which can be defined as historic properties.

3.1 **A historic property** is defined as one that is 50 years or older in age.

3.2 **A Registered Historic Property** is defined as one that is 50 years or older in age AND which is registered with a historic preservation office, society, or group.

3.3 **Determination:** A property which is identified as 50 years or older must be checked for Historical Preservation Status via information from:

3.3.1 The local county assessor

3.3.2 The Colorado Registers of Historic Places

3.3.3 The Federal Register of Historic Places



- 3.4 Verification:** Verification of compliance with this Programmatic Agreement will be confirmed on the client's application or Leap top sheet.
- 4. Weatherization Undertakings Exempt from Historic Review Process**
- 4.1** Exemptions are measures determined by DOE and SHPO to not have the potential to cause adverse effects on historic properties and therefore do not require the historic review process. See CEO-WAP-404 A1.
- 4.2** If measures are exempt per the Programmatic Agreement, CEO WAP 404 A3 must be completed and stored in file with Historic Registration Verification
- 5. Weatherization Undertakings Not Exempt from Historic Review Process**
- 5.1** When weatherization measures for a historic property *are outside the list of exemptions per the PA*, CEO WAP 404 A3 must be completed and stored in file, then SHPO is to be contacted before weatherization work occurs and should be coordinated with for the duration of the weatherization process. See CEO WAP 404 A7.
- 5.2 Adverse Effects** Actions, such as Weatherization measures, that will result in the diminishment of the historic integrity of the building.
- 5.3 Historic Review Process**
- 5.3.1** If the measures are not on the exemptions list, the recommended measures are either modified to comply with the exemptions list, or the historic review process continues.
- 5.3.2** When a measure or unit does not fall within the agreed upon exempt undertakings, the subgrantee will retain qualified professionals (see section 8.1) to act as its primary point of contact for historic property reviews and to assist the subgrantee in implementing their responsibilities under the PA throughout the process.
- 5.3.3** For non-exempt projects, a qualified professional may choose to submit a photograph of the property involved by email to receive SHPO's preliminary opinion on whether or not the property may be eligible for inclusion in the National Register of Historic Places.
- 5.3.4** If SHPO responds that the property does not have the potential to be eligible, and/or that the measures are in accordance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (36 CFR Part 68, July 12, 1995 Federal Register), subgrantees may proceed with the project without additional consultation.
- 5.3.4.1** Otherwise, the next steps in the historic evaluation process are followed.



- 5.3.4.2 The subgrantee/qualified professional will consult with SHPO to resolve the adverse effects caused by the non-exempt measures.
- 5.3.4.3 If the adverse effects are resolved, the property can move forward in the Weatherization process. If the adverse effects can not be mitigated, the project is deferred.

6. Reports

- 6.1 Subgrantees are required to send CEO WAP the following information, for the reporting period of September 1 to August 31:

- Total number of units completed that were paid for with DOE funding

- Total number DOE funded units completed that were exempt from SHPO due to age (older than 50 years)

- Total number of DOE units 50 years or older, that didn't require SHPO review (not historic registered properties)

- Total number of DOE units 50 years or older that had a prior SHPO review under a Community Development Block Grant (BDBG)

- Number of submissions made to SHPO for historically registered properties

- 6.2 CEO WAP will then submit this information to DOE, Advisory Council on Historic Preservation (ACHP), and National Conference of State Historical Preservation Officers (NCSHPO) in an annual report.

7. Duration of the Programmatic Agreement

- 7.1 On October 14, 2020, the ACHP issued a Program Comment on the PA extending all agreements made in accordance with the 2011 Program Notice through 2030, regardless of the duration clause of those agreements.

8. Amendments to the Programmatic Agreement

- 8.1 In 2012, the Programmatic Agreement was amended to reflect the name change of the Governor's Energy Office to the Colorado Energy Office, to modify the process by which WAP recipients, and their subrecipients, work with qualified professionals and how those qualified professionals seek preliminary reviews of eligibility by SHPO.

- 8.2 **Qualified Professional:** Subgrantees will use qualified professionals and may make arrangements to utilize qualified professionals in a manner that is most appropriate given the scope and nature of their particular program and projects, including hiring qualified professionals on a full-time, part-time, project specific, employee, or contractual basis.

- 8.2.1 Requirements for a "qualified professional" are outlined in the Amendment to the Colorado PA.



9. NEPA Requirements

- 9.1 In the event that weatherization work of any kind has the potential to impact or introduce negative stimuli to the environment in a way which would not be there without weatherization services NEPA Determination is required.
- 9.2 As determined by DOE Project Officers and partners within the Federal Government, typically, following the current PA with SHPO, should be within NEPA compliance.
- 9.3 NEPA determinations are required when one of the following may projects may happen:
 - 9.3.1 One which threatens or violates environmental, safety, or health requirements.
 - 9.3.2 One which has the potential to cause significant impacts on environmentally sensitive or culturally important resources.
 - 9.3.3 One which disturbs hazardous substances, pollutants, or contaminants.
- 9.4 Any measures which meet the qualifications of needing NEPA review may need to complete an Environmental impact survey through DOE.
 - 9.4.1 Notification of a CEO WAP Staff member is required if a job has the potential to meet these criteria. See CEO WAP 404 A8.

10. NEPA, SHPO, & Weatherization Readiness (WRF) Deferrals

- 10.1 Before any WRF are used on a home 50 years or older, the home must be searched within the appropriate register of historic properties, and all proceeding steps must be followed.
- 10.2 Deferrals mitigated on a home of any age with WRF have the potential to require NEPA determinations if:
 - 10.2.1 Construction of any kind occurs that would require ground disturbance of any kind (i.e. Removing trees or installing permanent equipment in the ground).
 - 10.2.2 Mitigation of hazardous materials is completed on a home (i.e. Asbestos or Lead).
- 10.3 In these events CEO WAP Staff should be notified before work is completed
- 10.4 Discussion and approval will be needed before starting work

11. Documentation in the Client File

- 11.1 Any other documentation related to the historic property or environmental impacts such as communication with a qualified professional, SHPO, or NEPA, should be included in the file as soon as possible.
- 11.2 Documents, correspondence, or any other information related to such reviews or consultations should be stored in the client fi



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11.3 SHPO

- 11.3.1 Upon creation of the file the State Historic Property template (CEO-WAP-404 A3) will be completed and included in the client file for all Registered Historic Properties.



CEO-WAP-501

Subcontracting

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [504](#), [802](#)

1. Abstract

1.1 This policy describes Colorado Energy Office Weatherization Assistance Program (CEO WAP) subgrantee requirements for the subcontracting of Weatherization services or materials.

2. Requirements for Subcontracting

2.1 Subgrantees are authorized to subcontract for the provision of WAP materials and/or services.

2.2 Final inspection of work performed may not be subcontracted.

2.3 Changes to the work order must be authorized and verified by subgrantee staff.

2.4 Subcontracts may not extend beyond the termination date of the weatherization contract through which funds are provided.

2.4.1 No subcontract shall extend longer than 12 months (subcontracting should coincide with the subgrantee's annual request for bids and/or proposals).

2.5 Subgrantees are responsible for ensuring that subcontractors are trained and in compliance with all relevant CEO WAP Policies and Procedures and the Colorado Field Guide, also known as the SWS.

2.5.1 This requirement will also be part of the signed contract between the subgrantee and the subcontractor.

2.6 CEO WAP Field Policies & Procedures

2.6.1 All subgrantee subcontractors are required to follow policies and procedures as set forth in CEO WAP Policies and Procedures in addition to meeting those given by DOE Health and Safety requirements.

2.7 Subcontractor Quality of Work

2.7.1 All subgrantee subcontracted work not meeting quality expectations will require correction and will be completed at the subcontractor's expense.



2.8 Subcontractor Inspection

- 2.8.1 All subgrantee subcontracted work must pass an inspection by a qualified subgrantee staff inspector prior to payment

3. CEO WAP Contract Requirements

3.1 Names and titles of the contracting parties

3.2 Dates

- 3.2.1 Effective date of the contract.
- 3.2.2 Termination date of the contract

3.3 Signature lines and dates

3.4 Provisions

- 3.4.1 Both federal and state provisions apply to contracts made with subcontractors.
 - 3.4.1.1 The items apply primarily to a contract involving subcontracted labor; however, some will apply to material purchases as well.
 - 3.4.1.2 The subgrantee must make that determination on the local level.
 - 3.4.1.3 Contract subject to funding from the State, DOE, and/or LEAP.

3.5 Waiver of liens against units served

- 3.5.1 All service provision subcontracts entered into by subgrantees for the performance of weatherization and related services must contain a "lien waiver".
- 3.5.2 Lien waivers are required for any subcontracting work done in a client's home, regardless of whether or not a written contract exists.
- 3.5.3 Each subcontract must contain a provision, whereby the subcontractor agrees to waive the right of placing a lien upon the unit served as recourse for non-payment or for any other reason.
- 3.5.4 Any costs incurred under a subcontract resulting from not including this provision will be subject to disallowance by CEO WAP.

3.6 Bid specs - incorporated or by reference

- 3.6.1 Minimum number of units and the dollar amount of materials, as applicable.
- 3.6.2 Reference to exhibits, standards, etc., if applicable.

3.7 Verifications

- 3.7.1 Proof of general liability insurance, including pollution occurrence insurance.
- 3.7.2 Proof of Workers' Compensation coverage.



3.7.3 Proof of appropriate licenses.

3.8 Clauses

3.8.1 Clause that states that work must pass inspection by subgrantee personnel before payment.

3.8.2 Clause requiring that the billing must contain the address of the unit served and must have charges separated into labor and material costs.

3.8.3 Clause which states that the contract in no way implies a contract between the state and the subcontractor.

3.9 Schedule of work

3.10 Costs

3.10.1 Prices for goods and/or services rendered.

3.10.2 Total cost in USD.

3.10.3 Method of payment.



CEO-WAP-502

Waiver Provisions

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [301](#), [305](#), [402](#), [604](#), [502 A1](#); [10 CFR 440.18\(a\)\(b\)](#), [10 CFR 440.21\(b\)-.22\(b\)](#)

1. Abstract

- 1.1 Subgrantees are required to obtain a waiver whenever there is a deviation from Colorado Energy Office Weatherization Assistance Program (CEO WAP) Policies and Procedures.
- 1.2 Waivers fall into one of two categories: subgrantee waivers or state waivers.
- 1.3 All approved waivers will be required to be kept in the client file.

2. Subgrantee Waivers

- 2.1 Subgrantee waivers are unit or job specific in nature; they are written comments that explain the issue in full.
- 2.2 Subgrantee waivers may be used if:
 - 2.2.1 A subgrantee encounters health and safety issues that preclude the installation of specific measures, or issues with the building structure that prevent the installation of specific measures.
- 2.3 Subgrantees may waive a required measure if:
 - 2.3.1 If it is technically not possible to install the measures.
 - 2.3.2 If conditions exist, and cannot be overcome, that would make the installation of the measure unsafe.
 - 2.3.3 The installation of the measure would threaten the health or safety of either the client or the worker
- 2.4 Final QCI inspection should verify that the technical waiver issued was appropriate and justified.
- 2.5 Subgrantee waivers must be documented in the client file and do not require prior CEO WAP approval as long as this does not violate CEO WAP Policy.

3. State Waivers

- 3.1 State waivers are general exceptions to CEO WAP Policies that require a written request and written approval from CEO WAP prior to the beginning of any work.
- 3.2 If a subgrantee wishes to waive any CEO WAP policy, a waiver must be submitted as outlined in section 5.



4. Multifamily Specific Waivers

- 4.1 The subgrantee must submit a proposal detailing the results of an energy audit and how much financial participation has been committed by the building owner.
- 4.2 Approval for the project may be granted, if CEO WAP requirements are met for the project.

5. Waiver Procedures

- 5.1 Subgrantees are required to complete the following documentation by using the appropriate procedure when requesting a waiver:
 - 5.1.1 The most recent state waiver form must be completed. See CEO WAP 502 A1.
 - 5.1.2 The waiver needs to include a detailed description of why the subgrantee wishes to waive policy AND the specific policy number that the subgrantee is requesting to waive.
 - 5.1.3 The waiver request must be submitted to the CEO WAP Associate Director
 - 5.1.3.1 The CEO WAP Associate Director will review the waiver request and render a decision in writing to the subgrantee.
 - 5.1.4 If the subgrantee requesting the State waiver disagrees with the decision of the Associate Director the subgrantee may follow the appeal process and appeal to the Director of Weatherization.
 - 5.1.5 If the subgrantee disagrees with the decision rendered by the Director of Weatherization, they may submit an appeal to the Deputy Director or Managing Director of the Colorado Energy Office.
 - 5.1.6 The decision of the CEO Deputy Director or Managing Director will be deemed final and no more appeals will be allowed.



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Weatherization Assistance Program

CEO-WAP-503 Pilot Projects

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

[10 CFR 440 Appendix A; 10 CFR 440.18 \(a\) \(b\), 10 CFR 440.21 \(b\)](#)

1. Abstract

1.1 It is the policy of Colorado Energy Office Weatherization Assistance Program (CEO WAP) to waive certain program regulations when a subgrantee is operating a pilot project approved by CEO.

2. References

2.1 The provisions set forth in the following references may be waived by CEO WAP for non-DOE pilot projects (as appropriate to the specific project).

2.2 Specific waiver provisions will be set forth in the contract by CEO WAP.

2.2.1 10 CFR 440.18(a) and (b) - Expenditure average and maximum.

2.2.2 10 CFR 440.21(b) - Restricting allowable materials to Appendix A of 10 CFR 440.

3. Pilot Project Measures

3.1 Pilot Project Measures are those optional heating and cooling measures that can be analyzed for cost effectiveness with (NEAT).

3.2 Other energy saving measures may be considered on a pilot basis as well.

4. Procedure for submitting Pilot Projects

4.1 A written proposal describing the pilot project shall be submitted to CEO WAP.

4.2 The proposal should include, but is not limited to, a description of the following items:

4.2.1 Materials and installation procedures that will be performed.

4.2.2 Expected costs and energy savings associated with the measure.

4.2.3 The savings analysis methods, such as NEAT analysis, short term metering, long term fuel consumption analysis, or other industry accepted techniques may be submitted for energy savings measurement.

4.2.4 Estimates of the number of homes that will receive the measure, the time period involved.

4.2.5 The impact of the project on the subgrantee's budget.

4.2.6 A methodology for analyzing the results of the project, including:

4.2.6.1 Financial tracking of materials and labor costs.

4.2.6.2 Measurement of the energy consumption before and after the pilot project is completed.



CEO-WAP-504 Workers' Compensation

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO WAP: [504 A1](#)

1. Abstract

1.1 This policy outlines the responsibilities for each subgrantee organization to provide worker's compensation coverage for all employees.

2. Requirements

2.1 Subgrantees of Colorado Energy Office Weatherization Assistance Program (CEO WAP) are responsible for providing workers' compensation coverage for all employees and for providing such coverage, or requiring subcontractors to provide such coverage for themselves, in accordance with current law.

2.2 In no case is CEO or the State of Colorado responsible for providing workers' compensation coverage for any employees or subcontractors of the subgrantee pursuant to the contractual agreement between the State and the subgrantee.

3. CEO WAP Workers' Compensation Checklist

3.1 The following procedure is recommended:

3.1.1 Require evidence of workers' compensation of all subcontractors.

3.1.2 If the subcontractor states that the election for no coverage has been made, require a letter from the subcontractor signed by each individual who qualifies and has made such an election.

3.1.3 The letter should say, in effect, that the individual is an individual employer, working partner, or corporate officer as defined by the Workers' Compensation Act of Colorado, updated for 2019, and has elected not to obtain workers' compensation coverage for himself or herself, does not desire to be covered by the policy, if offered, of the subgrantee, and therefore does not want to have any funds withheld for the purpose of workers' compensation insurance payment. See CEO-WAP-504 A1.

3.1.4 The letter should also state that the subcontractor has provided all necessary information to the subgrantee in order for the subgrantee to provide workers' compensation coverage for the subcontractor's employees.



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- 3.1.5 The subcontractor is to send a copy of this letter to its workers' compensation insurance provider or, if it does not have one, to the subgrantee's workers compensation insurance provider. This recommendation is not to be considered legal advice and subgrantees are strongly encouraged to obtain legal or insurance advice appropriate to the specific circumstances of the subgrantee.



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Energy Office

Weatherization Assistance Program

CEO-WAP-505

Vehicles

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [201](#), [205](#), [205 A1](#); [WPN 24-6](#); [DOE Disposal Decision Tree](#); [2 CFR 200.313](#), [2 CFR 200.405](#), [10 CFR 440.16\(e\)](#), [2 CFR 200.439](#)

1. Abstract

1.1 This policy provides guidance on the use of vehicles and capital equipment within the Colorado Energy Office Weatherization Assistance Program (CEO WAP), including information on procurement, disposal, asset transfers, general usage, and reporting.

1.2 The Capital Equipment threshold is defined in 2 CFR 200.439.

2. Procurement

2.1 Purchase

2.1.1 Any purchase of capital equipment (which includes vehicles) must be referred to CEO WAP for prior approval. As part of requesting prior approval, CEO-WAP-205 A1, Capital Equipment Request Form must be submitted to a CEO WAP Senior Program Manager.

2.1.2 Any capital equipment not received within the Fiscal Year it was originally requested in will need to be re-requested for the next budget cycle. These funds will not automatically roll over.

2.2 Once acquisition is complete, an updated capital equipment list must be sent to the CEO WAP Senior Program Manager for reference and record keeping purposes.

2.2.1 When using DOE funds to purchase vehicles, per 10 CFR 440.18(d)(6), requests must be submitted to CEO WAP so they may gain prior approval from DOE, in every instance.

2.2.2 Once CEO WAP receives prior approval from DOE, they will then provide the approval to the subgrantee and notify the requesting entity to initiate vehicle or equipment acquisition(s).

2.3 Lease

2.3.1 Any lease of vehicles must be referred to CEO WAP for prior approval. In order to determine the appropriate amount to bill the CEO WAP grant, the annual vehicle cost should be divided by the annual unit goal to determine the amount to be charged per unit closed.



3. Disposal

- 3.1 Any disposal of vehicles and capital equipment must be referred to a CEO WAP Program Manager for prior approval.
- 3.2 The subgrantee should work with the CEO WAP Program Manager on vehicle and capital equipment disposal, ensuring they demonstrate a clear need for disposal.
- 3.3 When disposing of a vehicle or capital equipment originally purchased with DOE funds, DOE rules for vehicle and equipment disposal must be followed. See DOE WPN 24-6 and the associated DOE Disposal Decision Tree for guidance.
- 3.4 Only under extreme circumstances should a vehicle or capital equipment worth more than \$5,000 be disposed of from the program.
 - 3.4.1 This must be confirmed with the CEO Associate Director.

4. Transfer of Assets

- 4.1 Vehicles and capital equipment may be transferred between subgrantees with the approval of a CEO WAP Program Manager. These instances require proof that the ownership, and liability associated with that vehicle or equipment, has been completely transferred from one subgrantee to another. Transfers are to be submitted to a CEO WAP Program Manager with the list of the subgrantee's capital equipment and must include the date of liability and transfer and the origin of the transfer.

5. Vehicle and Equipment Use

- 5.1 **Commuting:** Vehicles are not to be used for commuting or in any other manner that would substitute for a personal vehicle.
- 5.2 No personal use is allowed.

6. Subgrantee Policy for Vehicle and Equipment Use

- 6.1 Each subgrantee is to have a specific written policy for the use of vehicles and capital equipment purchased with CEO WAP funds.
- 6.2 **Inventory and Reporting**
 - 6.2.1 Property records must be maintained to include a description of the vehicle/equipment, a serial number or other identification number, the funding source used to purchase property (including the Federal Award Identification Number (FAIN), the percent of each funding source used to purchase the property, who holds the title, the acquisition date, the cost of the property, use and condition of the property, and the odometer mileage of the property. See WPN 24-6.
 - 6.2.2 Subgrantees must take a physical inventory and reconcile the results with the property records at least once every two years.
 - 6.2.3 A control system must be developed to ensure adequate safeguards to prevent loss, damage, or theft of the vehicle/equipment. Any loss, damage, or theft must be investigated.



- 6.2.4 6.4 Adequate maintenance procedures must be developed to keep the vehicle/ capital equipment in good condition.
- 6.2.5 6.5 If the non-federal entity is authorized or required to sell the vehicle/capital equipment, proper sales procedures must be established to ensure the highest possible return.

7. Reporting

7.1 In addition to CEO WAP guidelines, subgrantee management and accounting personnel should be familiar with and assure compliance with the Internal Revenue Service requirements for reporting; this may apply if a vehicle is taken home for “on-call” reasons.

- 7.1.1 The subgrantee may be liable for payments to the employee for the “on-call” or “stand-by” time even when the employee is not called out.

8. Non-Weatherization Usage with Capital Equipment

8.1 CEO WAP funded vehicles or other capital equipment are not to be used for non-weatherization activities unless pre-approved by a CEO WAP Program Manager. This includes such activities as non-profit work and by grants other than those distributed by CEO WAP.

8.2 8.2 If approved for usage in activities outside the weatherization grants, associated usage must be tracked and credited to the CEO WAP grant on a quarterly basis based on a usage fee.

- 8.2.1 The usage fee is determined by the subgrantee based on guidance in the 2 CFR 200. The subgrantee will have available to CEO the basis for the usage fee for the vehicle or capital equipment and the appropriate documentation for the charges, and ensure the usage fee is allocated and credited consistently across all funding sources.

8.2.2 Non-grant use should be charged to the original grant funding source based on the usage fee for the vehicle or capital equipment and this must be done consistently across all funding sources. (E.x. A vehicle originally purchased with DOE Formula is used on an activity outside of weatherization funded activities (such as CARE), the subgrantee credits DOE Formula back for that usage based on their vehicle usage fee determination.)

- 8.2.3 Should the original funding source no longer be a budget or funding category for CEO WAP, such usage fees should be credited back to CEO WX (that is, CEO WAP Administration funds).



CEO-WAP-601

Subgrantee Monitoring & Inspection

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [301](#), [602](#), [603](#), [601 A1](#), [601 A2](#), [601 A3](#); [2 CFR 200.332](#), [10 CFR 440](#)

1. Abstract

1.1 Colorado Energy Office Weatherization Assistance Program (CEO WAP) staff and other authorized individuals, require subgrantee staff and representatives to fully cooperate with monitoring and inspection activities.

2. Risk Assessment

2.1 The risk assessment will be updated with programmatic, quality management, and fiscal monitoring each year and communicated to the subgrantee at the start of each program year.

2.2 The assessment will include a number of factors to help determine the overall risk of a subgrantee. These factors may include but are not limited to:

2.2.1 Operating budget

2.2.2 Previous experience

2.2.3 Previous programmatic, fiscal, and quality assurance monitoring reports

2.2.4 Single Audit Findings

2.2.5 Time and effort reporting

2.2.6 Staff turnover

2.3 If a subgrantee is identified as Low Risk, they will receive one programmatic monitoring and one fiscal monitoring each program year.

2.4 If a subgrantee is identified as High Risk, CEO WAP will monitor that subgrantee twice a year in the area that the high risks were found (For example, if the majority of a subgrantees points on their risk assessment are from fiscal, they will receive a second fiscal monitoring. If both programmatic AND fiscal points are high, they will receive additional monitoring in each area.).

2.4.1 This additional monitoring will be ongoing until the identified issues are resolved.



3. Monitoring and Inspection Visits

- 3.1 The purpose of monitoring and inspection visits are to assess the current level of performance and compliance, determine future training and technical assistance (T&TA) needs, and to provide current T&TA.
- 3.2 Subgrantees will be given 1 month advance notice of site visits.
 - 3.2.1 This notice will also include a thorough description of the purpose of the visit.
- 3.3 CEO WAP staff will notify the subgrantee in advance the number of units/client files are to be inspected.
- 3.4 For QA, specific job numbers will be provided ahead of time so that clients can be contacted and client files pulled by the subgrantee.
 - 3.4.1 In some circumstances, CEO WAP may choose to withhold the information regarding some, or all, of the units selected until CEO WAP staff's arrival at the subgrantee office, at which time the units will be scheduled for inspection.
- 3.5 Once a unit or client file has been scheduled for inspection, subgrantees are prohibited from completing additional work or modifying the client file in any manner.

4. Administrative Monitoring

4.1 Programmatic Monitoring

- 4.1.1 Programmatic monitoring will be conducted by CEO WAP at least once per program year for each subgrantee organization and office.
- 4.1.2 Monitoring will include, but may not be limited to, a review of subgrantee's annuals such as: job descriptions, organization charts, client complaint log, as well as personnel related policies and procedures, inventory on site, client files, and interview questions that cover programmatic areas.
- 4.1.3 The number of files reviewed will correlate with the amount of units a grantee will complete in that program year and the funding under which it was performed. See CEO-WAP-601 A1 & A2.
- 4.1.4 CEO WAP will provide the following documents with instructions at least 30 calendar days in advance of the monitoring:
 - 4.1.4.1 Administrative Client File Checklist, Required Documents list, Pre-Interview Questions, and On-site Monitoring Tool.
 - 4.1.4.2 Failure to fulfill the requirements specified in the Administrative Client File Checklist, On-site Monitoring Tool, Required Documents, may result in corrective action for the subgrantee being monitored.



4.2 Fiscal Monitoring

- 4.2.1 Fiscal monitoring of subgrantees consists of a desk audit, a review of fiscal policy and procedures and inventory and procurement policies and procedures.
- 4.2.2 CEO WAP will provide the following documents with instructions at least 30 calendar days in advance of the monitoring:
 - 4.2.2.1 A questionnaire
 - 4.2.2.2 A checklist for required documents, insurance coverage, and a general ledger request
- 4.2.3 Monitoring will include but may not be limited to:
 - 4.2.3.1 Sampling of general ledgers to include accounts payable, journal vouchers, travel, and personnel timesheets and effort certification.
 - 4.2.3.2 Travel policy, travel transactions and related documentation
 - 4.2.3.3 Review of procurement policy; review of single or sole sources, methods to include small, minority and women-owned businesses, securing of price, inspection of non-employee work prior to payment
 - 4.2.3.4 Conflicts of interest policy
 - 4.2.3.5 Documentation of accounting practices and the segregation of duties.
 - 4.2.3.6 Review of cost allocation plan and financial policies
 - 4.2.3.7 Capital equipment authorization and review of the capital equipment list
 - 4.2.3.8 Review of insurance coverage

5. All Monitoring Results

- 5.1 Monitoring results will be provided in the form of a written report for Administrative and Fiscal Monitoring, and in the form of a Quality Management scorecard and monitoring Report for Quality Management Monitoring.
- 5.2 Results will be provided to the subgrantee leadership and/or designated persons within 30 calendar days of the completed monitoring activity.
- 5.3 For more Quality Management details on QA, see CEO WAP 602.
- 5.4 Required actions in response to a declared deficiency may include:
 - 5.4.1 Training of subgrantee staff
 - 5.4.2 Written verification of deficiency remediation
- 5.5 All subgrantees are required to read the reports and sign them within 30 calendar days of issue.



- 5.6** Monitoring results will rate subgrantees as highly capable, capable, satisfactory, and unsatisfactory:
- 5.6.1 **Highly capable:** the performance of a subgrantee is excellent. While Minor Deficiencies may be found, they are mostly clerical in nature. The overwhelming performance suggests a strong understanding of the program, strong internal controls, and excellent personnel performance in the relevant aspects of the program: fiscal, administrative, and technical.
 - 5.6.2 **Capable:** the performance of the subgrantee is strong. Minor deficiencies may be found, but the performance suggests a high performing subgrantee in the relevant aspects of the program: fiscal, administrative, and technical.
 - 5.6.3 **Satisfactory:** while the performance is adequate, the number and nature of the minor or major deficiencies suggest some improvements are needed in certain categories.
 - 5.6.4 **Unsatisfactory:** The number and nature of the major or minor deficiencies are such that subgrantee performance is unsatisfactory. This rating will require a corrective action plan and additional monitoring.
- 5.7 Major Deficiency**
- 5.7.1 A grave or significant deficiency constituting noncompliance with the Code of Federal Regulations, CEO WAP Policy or the Colorado Field Guide. Require a detailed response including a formal corrective action plan from the subgrantee. The following is a non-exhaustive list of major deficiency examples:
 - 5.7.1.1 The health and safety of clients, subgrantee staff, or subgrantee subcontractors, or the integrity of the building structure is threatened by work completed by the subgrantee.
 - 5.7.1.2 A required cost-effective measure, a necessary repair, or a required health and safety repair is omitted, without appropriate authorization.
 - 5.7.1.3 Poor quality work, materials, or equipment resulting in significantly degraded performance or appearance of measures or repairs.
 - 5.7.1.4 Disallowable costs, evidence of financial mismanagement, or lack of delegation of fiscal duties.
 - 5.7.1.5 Complete disregard for program policy and requirements.
 - 5.7.1.6 Ongoing minor deficiencies from previous year(s) monitoring that have not been resolved.



5.7.2 Two or more items requiring a formal corrective action plan may influence a subgrantee's standing with CEO WAP.

5.8 Minor Deficiency

5.8.1 Requires a response from the subgrantee, detailing the actions the subgrantee will take to alleviate the deficiencies identified in the monitoring report.

5.8.1.1 A single occurrence of poor-quality of work, materials, or equipment that results in minor degradation of performance or appearance of measures or repairs (e.g. sloppy work, missing attic insulation measuring sticks, incorrect documentation.

5.8.1.2 Work site cleanup that does not meet the satisfaction of the client or a State Inspector.

5.8.1.3 Noncompliance with a program policy which is not grave or significant in nature in the administration of the program, whether fiscal or programmatic. Examples may include:

5.8.1.3.1. Incorrect application dates in the client file

5.8.1.3.2. All appropriate checkboxes not filled out on the client application (i.e. permission to photograph, etc.)

5.8.1.3.3. Backup fiscal documentation does not align to subgrantees' fiscal policies.

5.9 Recommendations

5.9.1 Organizational practices observed during monitoring that do not constitute substantial noncompliance with CEO WAP Policy and do not require any corrective action by the subgrantee.

5.10 Best Practices

5.10.1 Organizational practices observed during monitoring (administrative, fiscal, or technical in nature) that are exemplary, whereby CEO WAP may make a best practice determination within the Administrative Monitoring Report or the Quality Management scorecard.

5.11 Go Backs

5.11.1 Go Backs are occurrences when a subgrantee is required to return to a unit to install a measure, or do a repair, but a deficiency is not issued.

5.11.2 Go Backs cannot be paid for with DOE funds.



CEO-WAP-602

Corrective Action-Removal Procedures

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO WAP: [601](#)

1. Abstract

1.1 In accordance with the requirements of the Colorado Energy Office Weatherization Assistance Program (CEO WAP) and the Department of Energy (DOE) regulations, this policy reviews accountability for Quality Control Inspectors (QCI), for the Corrective Action and Removal Procedures pertaining to CEO WAP subgrantees.

2. Background

2.1 This policy will be enacted when two of the same scorecard major deficiencies, attributable to the same QCI, are discovered during State Quality Assurance (QA) visits, over the course of any two consecutive Program Years (PY).

2.2 Subgrantees must establish internal protocols to remove poor performing QCI's from performing inspections within their organization and then inform a CEO WAP Quality Manager.

3. Amelioration Procedures

3.1 The subgrantee inspector and their supervisor will be required to complete a "root cause" exercise by answering a CEO WAP provided questionnaire, submit a plan of action to CEO WAP that identifies the root cause issue type, and how they will prevent the issue in future units.

3.2 They will identify if the issue is a training, process, or accountability issue. Final determination will be based upon CEO WAP observations in the field as well as review of the questionnaire.

3.2.1 If determined that it is a training issue:

3.2.1.1 Complete CEO WAP mandated training via a learning platform, other CEO WAP approved training, or quality control (QC) training with CEO WAP Quality Management Staff.

3.2.2 If determined that it is a process issue:



- 3.2.2.1 A “Process Evaluation Meeting” will be held between CEO WAP Quality Manager, the subgrantee inspector, and their direct supervisor. Recommendations for refining processes will be made and a subgrantee plan will be established.
 - 3.2.3 If determined that it is an accountability issue:
 - 3.2.3.1 The subgrantee will define the internal disciplinary process that they will be holding their inspector to.
 - 3.3 CEO WAP reserves the right to remove an inspector from performing inspections within the network if they show a pattern of deficient work after being given opportunities to seek additional training and process consulting.
 - 3.3.1 CEO WAP’s right to remove an inspector will be triggered by four of the same scorecard Major Deficiencies, attributable to the same QCI, over the course of any four consecutive program years.
 - 3.3.2 Subgrantee internal disciplinary procedures can remove inspectors from performing inspections within their organizations due to poor performance, but not from the CEO WAP network.
 - 3.3.3 Removal from inspecting within the network will be the decision and responsibility of CEO WAP.
4. **Corrective Action & Removal Procedures Tracking**
 - 4.1 Individual subgrantee inspector status will be identified at the end of each program year and will be updated upon completion of each QA visit.
 - 4.2 Prior to hiring a QCI, subgrantees are responsible for checking with CEO WAP Quality Manager to ensure that the potential hire is not disqualified from performing inspections within the network.



CEO-WAP-603

Subgrantee Standing Determination

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [102](#), [301](#), [302](#), [604](#); [CFR 180](#), [2 CFR 200.207](#), [2 CFR 200.301](#), [10 CFR 440.15](#)

1. Abstract

- 1.1 This policy instructs how the standing of subgrantee agencies is to be determined.
- 1.2 Determination of standing may occur at any time, but will always be evaluated at the time a Request for Application (RFA) is initiated and communicated to the subgrantee in writing.
- 1.3 A subgrantee in good standing may receive preference in the evaluation of their response to an RFA.

2. Objectives to Determine Standing

- 2.1 Objectives which reflect CEO WAP's view as to how grant funding and other resources are applied will be considered in determining a subgrantee's standing, included but are not limited to:
 - 2.1.1 The assurance that the appropriate installed measures meet the requirements of cost effectiveness
 - 2.1.2 Using all CEO WAP funds available in ways that provide the greatest level of service per dollar, particularly as this pertains to material and labor funds (measurable by energy saved per dollar), overhead costs, administration, and training and technical assistance funds.
 - 2.1.3 Operating the program and using funds in compliance with program rules and regulations.
 - 2.1.4 Services are provided comprehensively, meeting the specific needs of each household served; complete weatherization services including heating system, insulation, air leakage, finished appearance, and client education.
 - 2.1.5 Applying sound energy conservation principles and using proven technologies, as well as protecting the health and safety of clients, as they pertain to CEO WAP services whilst following established procedures/guidelines.



2.1.6 Establishing service goals to reflect program policy and attain all other program goals.

3. High Risk Standing Determination

3.1 A subgrantee will be classified as high risk in the event that one or more of the following is found to be true:

3.1.1 Sizeable, frequent, or deliberate quality, financial, or programmatic mismanagement is documented utilizing.

3.1.2 Production goals are not completed in a timely manner

3.1.3 Waste, fraud, or abuse has occurred in any way regarding work done with monies contracted by CEO WAP.

4. Notification of High Risk Standing

4.1 When a subgrantee has been classified as high risk, the following process must occur:

4.1.1 The subgrantee will be notified in writing (mail or electronically) as to their high risk status

4.1.2 A statement of reasons why additional conditions are being imposed

4.1.3 The nature of required response plan or corrective action, which may include additional monitoring and/or training

4.1.4 The time allotted for completion of response plan or corrective action

4.2 The appeals process can be requested by a subgrantee at any time.

5. Removing High Risk Standing

5.1 Once a subgrantee is considered high risk a response plan will be put in place or as stated above, funding will be suspended or terminated.

5.2 The decision for removal of high risk status will be based on the following:

5.2.1 The nature of the deficiencies yielding the high risk status.

5.2.2 The subgrantee's responsiveness to the high risk status.

5.2.3 The subgrantee's successful completion of any required additional monitoring or training.

5.2.4 CEO WAP's assessment of the subgrantee's potential for improving overall performance to an acceptable level.

5.3 Once it is determined that an organization is no longer considered high risk, due to the aforementioned action and conditions, they will be notified in writing (mail or electronically) as to their high risk status.



6. Actions for Noncompliance

6.1 When corrective action and deficiency items occur, such as those items defined above, CEO WAP will take one of the following actions:

6.1.1 Temporarily withholding of cash payments pending correction of the deficiency.

6.1.2 Disallowance of all or part of the cost of the activity or action not in compliance.

6.1.3 Wholly or partly suspend or terminate the current award.

6.1.4 Withholding of further awards.

6.1.5 Board notification and required response from the Board, as applicable.

6.1.5.1 This refers to a board of county commissioners or non-profit board which oversees the subgrantee in question.

6.1.6 Other remedies that may be legally available.

6.1.7 The reallocation of funding or production to another CEO WAP contracted entity.

6.1.8 If the deficiencies are determined to be a result of flagrant and/or frequent noncompliance, this will be considered of serious impact to the subgrantee's ability in continuing to operate the program effectively; steps then will be taken to suspend or terminate funding.

7. Suspension of Funding

7.1 Funding may be suspended, in whole or in part, by CEO WAP for frequent or repeated violations, as well as financial mismanagement.

7.1.1 In such a case, written notification will be sent to the subgrantee and the DOE stating the reasons for suspension, the effective date, and in the case of a partial termination, the reduced or modified portion of funding.



COLORADO

Energy Office

Weatherization Assistance Program

CEO-WAP-604

Subgrantee Appeals to CEO

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

[Colorado Revised Statute/Procurement Rules R-24-109-202-1](#), [10 CFR 600.22](#), [48 CFR 33.214](#)

1. Abstract

1.1 This policy discusses the process and requirements for a subgrantee's appeals to the Colorado Energy Office Weatherization Assistance Program (CEO WAP) in cases of conflict.

2. Subgrantee Appeal to CEO WAP

2.1 Subgrantees may appeal any decision or action made by CEO WAP, when cause for such an appeal can be presented.

2.2 Such appeals shall follow the procedures listed in this policy

2.3 Appeals to the decisions made by a CEO WAP Program Manager may be elevated to the Director of CEO WAP.

3. Appeal to the Director of CEO WAP

3.1 Appeals are to be presented in writing to the WAP Director within 30 working days of the day of issuance.

3.2 Appeals received after the prescribed time period will be considered invalid.

3.3 The written appeal shall include copies of all documents regarding the decision or action taken by the CEO WAP.

4. Response from the Director of CEO WAP

4.1 The WAP Director will review the information and issue a written decision to the subgrantee within 30 working days of receipt of the written appeal. This written decision will include the following elements:

4.1.1 Description of the controversy

4.1.2 Reference to the pertinent contract provision

4.1.3 Statement of the factual areas of agreement and disagreement

4.1.4 Supporting rationale for the decision

4.1.5 Notice of the subgrantee's right to appeal the decision

5. Alternative Dispute Resolution

5.1 Alternative dispute resolution may be used at any time during the above process.

5.2 Appeals may be made to the CEO Deputy Director in extenuating circumstances.



CEO-WAP-605

Required Notifications

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

1. Abstract

1.1 Subgrantees are required to inform Colorado Energy Office Weatherization Assistance Program (CEO WAP) of specific changes regarding subgrantee administration/ organization, as well as serious client complaints or complaints that have the potential to yield outside attention.

2. Subgrantee Administration Changes

2.1 Subgrantees are required to provide timely, written notification within two weeks of each occurrence to CEO WAP of any changes regarding:

- 2.1.1** The legal status of the organization (by-laws, articles of incorporation, etc).
- 2.1.2** Change or modification of board members and officers
- 2.1.3** Signature authority for fiscal reports
- 2.1.4** Staffing changes in “key” positions (positions which interact with CEO WAP staff).
- 2.1.5** Fiscal policy, indirect letter from a cognizant agency, cost allocation plan

3. Subgrantee/Client Issues

3.1 CEO WAP is to be informed as soon as one or more of the following are an issue:

- 3.1.1** Weatherization work performed by the subgrantee has caused the client to make a health/safety complaint.
- 3.1.2** The client complaint could potentially yield media attention.
- 3.1.3** The client (or a representative of the client) has threatened to take legal action.
- 3.1.4** Any client complaint, which in the opinion of the subgrantee, could emerge and threaten any aspect of either the program and/or the funding for the program. If uncertain, it is best to communicate with CEO WAP.



CEO-WAP-606

Policy Update Process

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

[CEO WAP Memos](#)

1. Abstract

- 1.1 This policy addresses the process for updating, creating, saving, and archiving Colorado Energy Office Weatherization Assistance Program (CEO WAP) policies.
- 1.2 CEO WAP reserves the right to update, create, or archive policies at any time during a contract period.

2. Policy Review

- 2.1 Policies are to be reviewed by CEO WAP staff on a regular basis to ensure that they are consistent with the CEO WAP strategic plan, regulations, procedures at the state or federal level, and the WAP policy writing style guide to ensure uniformity.
- 2.2 This policy will be reviewed on an annual basis, and published at least one month prior to the commencement of the next fiscal year, to assure that it is the most efficient way to adopt policy change.
- 2.3 During the annual policy review, subgrantees will provide feedback via the Policy Feedback Form for the program year.

3. Update to Existing Policy

- 3.1 All changes made, unless immediate in nature, will be released to WAP subgrantees at least one month before the beginning of the next fiscal year as one compilation PDF, and will be implemented on the first day of said fiscal year.
 - 3.1.1 If an immediate change to existing policy during the program year is required, a memo will be issued.
- 3.2 All policies will be available to subgrantees through the CEO WAP website and upon request.
- 3.3 Subgrantee suggestions for edits throughout the program year will be emailed to their program manager.
- 3.4 Once the policy change has been submitted it will be the responsibility of the policy team to review the changes and format text according to the WAP Policy Style Guide.



4. New Policy

4.1 New policies may be created for a variety of reasons, including, but not limited to: CEO WAP strategic plan changes or updates to policies, regulations, or procedures at the state or federal level.

4.1.1 All new policies should match the stylistic conventions of existing policies.

4.2 If a new policy is proposed, it shall be sent to the CEO WAP policy team for review through the appropriate procedure in the aforementioned section, 3.

4.3 New policy will only be implemented within the same program year if, and only if, it is required by DOE policy, federal or state government, or poses a health and safety risk to subgrantees, CEO WAP staff, and/or clients.

5. Archived Policy

5.1 Existing policies may be archived for a variety of reasons, including, but not limited to: CEO WAP strategic plan changes, updates to policies, regulations, or procedures at the state or federal level, or a current policy may be incorporated into other policies.

5.1.1 If a policy is being incorporated into an existing policy, the procedure in Section 3 of this policy is followed.

5.1.2 The policy to be removed will be submitted to the CEO WAP policy Team for review.

5.1.3 The proposed policy will only be removed within the same program year if, and only if, it is required by DOE policy, federal or state government, or poses a health and safety risk to subgrantees, CEO WAP staff, and/or clients .

5.1.4 No policy will be completely deleted but rather removed from the website and future publication of the CEO WAP Administrative Policies will be saved and archived for future reference.

6. Waiver

6.1 If circumstances prevent the implementation of a policy or procedure, the subgrantee may submit a waiver requesting an extension to a CEO WAP Program Manager.

7.

7.1 If circumstances require, CEO WAP may take steps to expedite the policy creation and update process. However, even when expedited, the process will always include internal review by CEO WAP staff and external review by subgrantee staff.



COLORADO

Energy Office

Weatherization Assistance Program

CEO-WAP-607

Media & Communication Guidelines

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [608](#)

1. Abstract

1.1 All members of the Colorado Weatherization Program, subgrantees and grantees alike, must comply with the State of Colorado Governor's Office media relations requirements designated within this policy.

2. CEO Communications

2.1 It is required that all requests from the press in reference to the Colorado Energy Office or the Weatherization Assistance Program be directed to the CEO WAP Communications Manager or Engagement Manager. The CEO WAP Engagement Team will coordinate with the CEO PIO and the Subgrantee to form a response or schedule an interview.

2.1.1 Guidance will be given on how to respond to the topic of discussion.

2.1.2 This will assist in conveying a consistent message about the Weatherization Assistance Program (WAP) and its goals of helping income qualified families.

2.2 CEO will give subgrantee Program and/or Office Directors notice when reporters contact CEO to seek additional information from the subgrantee.

3. CEO Name Referencing

3.1 When referencing the program to the general public, subgrantees should refer to the program as "Colorado Energy Office Weatherization Assistance Program."

3.1.1 After the first reference, the acronym (CEO WAP) may be used.

3.2 References to the Colorado Energy Office Weatherization Assistance Program

When referring to a program or project for which CEO WAP provides funding, partners must:

3.2.1 Recognize CEO as a program funder



- 3.2.2 Link to the CEO WAP website:
<https://energyoffice.colorado.gov/weatherization-assistance-program>
 - 3.3 CEO WAP staff will provide a variety of uniform statewide outreach materials to each subgrantee.
 - 3.4 CEO reserves the right to require specific messaging and design be used in materials and digital assets that are not created by its office when the materials are promoting WAP.
4. **Colorado Energy Office Logo**
 - 4.1 The CEO logo must be included on a partner's website, electronic documents, and printed materials when promoting WAP.
5. **Publications**
 - 5.1 All printed materials used for outreach or other specific uses will need to follow the "Name Referencing" guidelines.
 - 5.2 All materials and website pages that include reference to the Colorado Energy Office must be approved in advance of publication by the CEO WAP Communications Manager or Engagement Manager.
6. **Partner Communications Process**
 - 6.1 This policy should be used as a guide to help you communicate about efforts and partnership with CEO.
 - 6.2 Designate one person within your organization to be responsible for communicating and marketing for the program.
 - 6.2.1 Make sure this person connects with the CEO WAP Communications Manager or Engagement Manager.
 - 6.3 Ensure that the program is posted on your website in a relevant and visible location.
 - 6.4 Include announcements about the program in your organization's electronic and printed newsletters.
 - 6.4.1 Ask other community organizations to include information in their newsletters as well.
 - 6.5 Work with the CEO PIO to earn press coverage in your local media outlets.
 - 6.6 Maximize the program's visibility at community events, in organization displays or at speaking opportunities.
 - 6.7 Gather success stories resulting from the program and highlight them through case studies, features in publications, and as website content.
 - 6.8 Work with the CEO WAP Communications Manager to ensure that your organization's information is correct on the CEO website.



COLORADO

Energy Office

Weatherization Assistance Program

CEO-WAP-608

Branding Guidelines

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO WAP: [607](#)

1. Abstract

1.1 This policy was created to assure the correct use of the Colorado Energy Office (CEO) and Colorado state logo in all instances when used by Weatherization Assistance Program (WAP) subgrantees.

2. WAP Marketing and Materials

2.1 All printed materials used for outreach or other specific uses will need to follow the guidelines for language, referencing, and communications outlined in CEO-WAP-607.

2.2 All materials and website pages that include reference to the Colorado Energy Office (CEO) must be approved in advance of publication by the CEO WAP Communications Manager or Engagement Manager

3. Colorado Energy Office Logo

3.1 There is a library of official logos that can be used. Contact the Communications Manager or Engagement Manager for access.

3.2 The logo is not to be changed in any way.

3.3 Any official use or publication of the CEO logo must be approved by the CEO WAP Communications Manager or Engagement Manager.

3.4 At no time should the CEO logo be copied from the CEO's website.

3.5 The CEO logo should always be smaller than the logo of the subgrantee.

3.6 What not to do:

3.6.1 Do not condense, extend, distort, crop or redraw any part of the logo.

3.6.2 Do not incorporate the logo into another logo.

3.6.3 Do not use the logo within text.

3.6.4 Do not change the proportion of any element on the logo.

3.6.5 Do not split apart any elements of the logo.



CEO-WAP-609

Subgrantee Training & Certification

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

[2 CFR 200.308](#)

1. Abstract

1.1 This policy identifies training and certification requirements from the Colorado Energy Office Weatherization Assistance Program (CEO WAP) for subgrantee staff.

2. Training and Certifications Requirements

2.1 Training Goals

- 2.1.1 To increase energy savings and improve customer satisfaction through development of a more effective workforce.
- 2.1.2 To promote continuing education and professionalism in the workforce.
- 2.1.3 To develop local training resources.
- 2.1.4 To customize training towards individual skill and knowledge.
- 2.1.5 To improve workforce health and safety.

3. Subgrantee Requirements

3.1 Subgrantees must designate one employee to be a Lead Agency Trainer.

3.2 The subgrantee must determine how much time the Agency Trainer(s) will devote to training others and must justify this determination in the Agency Training Plan.

3.2.1 The Agency Trainer is recommended to spend at least 10 percent of their time receiving training.

3.2.2 CEO requires that, at a minimum, the following percentage of a Lead Agency Trainers time be designated to training others:

<u>Number of WAP Staff</u>	<u>Percentage of FTE</u>
Less than 10	25%
Less than 20	50%
Less than 30	75%
Greater than 30	100%



3.2.3 It is recommended that subgrantee field staff spend five percent or more of their time in training.

3.2.4 Training may include technical, programmatic, or administrative training.

3.3 Training Plans

3.3.1 Subgrantees are required to submit an Agency Training Plan each year that outlines its training goals.

3.3.2 Subgrantees must monitor, track, and report the training performance as detailed on the Agency's Training Plan to CEO.

3.3.3 Subgrantees managers and staff must review CEO WAP Policies and Colorado SWS in the first quarter of each program year.

3.3.4 A template for creating this plan is included as an addendum to this policy. The plan must include the following:

3.3.4.1 Current certifications

3.3.4.2 Certification expiration

3.3.4.3 Continuing education credits needed for recertification

3.3.4.4 Certification objective for program year

3.3.4.5 Any subcontractor certification or general training goals

4. Agency Lead Trainer Requirements

4.1 Must develop and implement all aspects of the Agency Training Plan.

4.2 The trainer(s) must deliver and/or facilitate all field and administrative training components to employees, including:

4.2.1 Monitor, track, and report the training performance of all weatherization employees.

4.2.2 Assess employee and subcontractor competence and provide recommendations for certification objectives.

4.2.3 Serve as the primary point of contact for CEO on all matters related to training.

4.2.4 Review Quality Assurance reports written by CEO, identify any deficiencies, and develop a training plan to ensure these issues do not persist in the future.

4.2.5 This training plan will be included in the subgrantee's written response to the QA report.

4.3 Facilitate the ongoing career and skills development of the subgrantee's field staff.

4.4 Agency Trainers may conduct job tests on field employees and subcontractors.

4.5 Have the capability to work with energy analysis software (NEAT/MHEA).



5. Subcontractors

5.1 Subcontractors are not currently required to meet certification mandates. However, CEO may implement this requirement in subsequent program years.

5.1.1 As such, subcontractors are strongly encouraged to receive training on program requirements.

5.2 Agency Trainers may invite subcontractors to participate in local field training or provide on-the-job training to subcontractors on the job-site.

5.2.1 Subcontractors should be encouraged to enroll in subgrantee training courses, such as the BPI certification courses or field internships.

5.2.2 T&TA funds may be used to train contractors, provided that the subcontractor is participating in providing weatherization services during the program year.

5.2.2.1 In making the determination for contractor participation in training with grant funds, subgrantees must secure a retention agreement in exchange for the training.

5.2.2.2 The contract agreement must stipulate that contractors will work in the program, at a minimum, for a specific amount of time that aligns with the cost of the T&TA provided.

5.2.2.3 Subgrantees must obtain approval to enter into such agreements by CEO prior to engaging with the contractor.

5.2.2.4 After the approval process, proof of agreement in the form of a contract must be provided to CEO before subcontractors can receive scholarship compensation.

5.2.2.5 CEO will only compensate for tuition costs, travel, per diem, and other ancillary costs associated with training will not be approved.

5.2.2.6 The grant may pay up to 100 percent of tuition costs for subcontractors.

6. Certification Requirements

6.1 Subgrantees must plan for all field staff to receive, at minimum, one BPI certification or certification from an IREC accredited training entity which proves competency in at least one area relative to their job classification within eighteen months of being employed by a subgrantee.

6.2 BPI

6.2.1 Subgrantees must use a properly trained and certified BPI QCI to perform a final inspection for single family and individually heated multi-family units.

6.2.2 Centrally heated multi-family units must be inspected by a properly trained competent Agency Inspector.



- 6.2.3 If extenuating circumstances arise and an employee is unable to attain a BPI certification, CEO must be notified and the worker's continued employment must be approved through a waiver process. This exception may also be granted to an employee who currently carries a certification that meets or exceeds BPI professional levels.
- 6.2.4 In the event that BPI certification lapses, the employee will be expected to seek recertification in a BPI category relative to their job duty within eight months of certification expiration.
- 6.3 **OSHA**
 - 6.3.1 Standard 10 hour training is required for all workers and OSHA 30 or CPR/ First Aid certification is required for crew leaders.
- 6.4 **Asbestos**
 - 6.4.1 Subgrantees must have a Colorado Certified Asbestos Inspector on staff who is responsible for regulatory compliance and for providing guidance to the subgrantee, regarding asbestos-related situations and issues.
- 7. **Lead**
 - 7.1 Monitors/Inspectors must be certified renovators and receive Lead Safe Work training.



CEO-WAP-610

Record Retention

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [103](#), [306](#), [401](#); [State Of Colorado Procurement Manual](#); [2 CFR 200.333-.337](#), [10 CFR 440.18\(f\)\(2\)\(iii\)](#)

1. Abstract

- 1.1 Subgrantees of Colorado Energy Office Weatherization Assistance Program (CEO WAP) are required to retain all pertinent records for three complete years after the submission of the final expenditure report of the grant, per 10 CFR 600.153. Pertinent records are described below. See CEO-WAP-103.
- 1.2 All funds granted and subgranted out regardless of their source (federal or state) shall follow the following retention timeline:
 - 1.2.1 CEO WAP Program Years beginning July 1, 2017 through June 30, 2022, that do NOT include DOE BIL funds, must be retained until October 1, 2025.
 - 1.2.2 CEO WAP Program Years beginning July 1, 2022 through June 30, 2025, that do NOT include DOE BIL funds, must be retained until October 1, 2028.
 - 1.2.3 All records (jobs, payroll, materials, etc.) that utilize DOE BIL funds must be retained until further notice.

2. Weatherized Unit Records

- 2.1 Per 10 CFR 440.18(f)(2)(iii) and CEO-WAP-401, subgrantees are restricted against weatherizing units previously served by a CEO WAP, except for units partially weatherized during the period September 30, 1975 through September 30, 1994 or those which requalify due to a force majeure.
- 2.2 To document compliance, subgrantees must retain documentation on all units within the subgrantee's service area which have received weatherization.
- 2.3 At a minimum, the information retained must include the address of the unit and the date of the service.



- 2.4 This documentation must cover all units served since October 1, 1975 for the subgrantee's entire service area.
 - 2.4.1 This pertains to all CEO WAP funded programs. Any subgrantee which, for any reason, is missing any of these records, must notify CEO WAP for guidance immediately upon discovery. See CEO-WAP-306 & 401.
3. **Other Records**
 - 3.1 Other Records include:
 - 3.1.1 Real Property
 - 3.1.2 Equipment records (from acquisition date to the date of disposal)
 - 3.1.3 Indirect cost rate computations or proposals
 - 3.1.4 Cost allocation plans
 - 3.1.5 Time cards
 - 3.1.6 Employee Records
4. **Storage**
 - 4.1 Records are to be stored in a secured location that prevents damage and protects client confidentiality. Information that is written on paper must be completed with ink to prevent erasure.
 - 4.2 It is permissible to use an electronic format as long as the media is protected from potential damage and erasure.
 - 4.3 Such media should be backed up on a periodic basis.



CEO-WAP-701

Data Entry & Reporting

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [201](#), [203](#), [301](#), [401](#), [403](#), [903](#), [801-904](#), [SF user guide](#)

1. Abstract

- 1.1** The Building Weatherization Report (BWR) from Salesforce reflects production information and data collected by subgrantees for units weatherized through the Colorado Energy Office Weatherization Assistance Program (CEO WAP).
- 1.2** Each entry in Salesforce is referred to as a “Job”.
- 1.3** For the most up to date requirements for data entry, refer to the Salesforce user guide.

2. Subgrantee Responsibilities

- 2.1** It is each subgrantee’s responsibility to enter all required data into Salesforce.
 - 2.1.1** Data must be entered accurately and completely as outlined in this policy.
- 2.2** The subgrantee is required to enter the status of the job and update the status as the job progresses, for example “wait list” to “audit completed” to “work in progress”, etc.
- 2.3** All approved applications (regardless of date received) must be entered into Salesforce.
 - 2.3.1** An approved application is defined as all application materials being received, client’s eligibility has been verified, and client and unit are approved for weatherization services (including previously weatherized check).
- 2.4** All waitlist jobs must be entered into the WAP Salesforce Database for tracking purposes.
- 2.5** The subgrantee is required to label the final funding sources used before closing the job.
 - 2.5.1** In the event that a funding source needs to be changed in Salesforce after it has been reported or invoiced, CEO WAP must be notified.
- 2.6** It is imperative that costs and applicable data are recorded prior to any invoicing to CEO.



- 2.6.1 If subgrantees are invoicing for jobs in progress, the completed measure record in Salesforce must be updated with costs and funding source.
 - 2.6.2 Audit and inspection costs must be recorded in the respective fields in Salesforce.
 - 2.7 Measures paid for by non-WAP funds **must not** be included in the BWR.
 - 2.8 The due date for Salesforce entries on closed jobs is the 15th day of the month following the month when jobs are closed.
 - 2.8.1 If the 15th falls on a weekend or holiday, reporting will be due on the preceding work day.
3. **Job Status Definitions**
 - 3.1 **New:** The application is not yet approved or denied. The subgrantee may be missing documentation in order to determine if the application will move forward to become a job.
 - 3.2 **Application Denied:** The application has been denied for weatherization services. When the Application Status is marked "Denied," it will default to this status.
 - 3.3 **Wait List:** The application has been approved for weatherization and the job is placed on the waiting list.
 - 3.4 **Deferred:** The decision of a subgrantee to not provide weatherization services to a unit due to health, safety, or administrative reasons, until the situation is rectified.
 - 3.5 **WRF Deferral:** The use of readiness funds in order to remediate the deferral of the job.
 - 3.6 **Pending:** The window between the time when the audit is scheduled and when the audit will happen.
 - 3.7 **Audit Completed, No Measures:** The completed energy audit resulted in no measures, closed so the job will not move forward.
 - 3.8 **Audit Completed:** The energy audit for the job has been completed.
 - 3.9 **Work in Progress:** The weatherization work for the job has begun and is currently in progress.
 - 3.10 **Closed:** The job has all measures installed; the funding sources are identified and final costs collected. The job has received a final QCI, and no changes need to be made.
4. **Criteria for closing a job in Salesforce**
 - 4.1 In order to assign a job as closed, by selecting a "Closed" job status and entering a "Closed Date," the job must meet the following criteria:
 - 4.1.1 All measures have been installed in accordance to CEO WAP Policy including the Colorado Field Guide (H&S, ECM, and Electric Appliances)



- 4.1.1.1 This includes a heating system. If an ASHP is to be installed, the job may not be “closed” until that installation (and inspection) is complete.
 - 4.1.2 All measures have a funding source identified and real (not estimated) costs associated have been documented in the appropriate Salesforce fields.
 - 4.1.2.1 This includes Audit and Quality Control Inspections (QCI)
 - 4.1.3 The job has been inspected by the subgrantee QCI, as outlined in CEO WAP policy.
 - 4.1.4 There is generally no other reason to make changes to the job or applicant data in Salesforce.
 - 4.2 Once a subgrantee marks the job as closed, there should be no more edits to the job.
 - 4.2.1 When a job is closed and information needs to be changed, CEO staff must be consulted on the data change before making the update.
 - 5. **Verifications**
 - 5.1 The data collected through the Salesforce is highly valuable and very important for monitoring and decision making within CEO WAP.
 - 5.2 Following the subgrantee's monthly data entries, CEO WAP will conduct desk audits to ensure data quality assurance.
 - 5.2.1 Subgrantees who are found to be entering data incorrectly or incompletely will be notified and asked to fix previously completed units, as well as enter future data as described in this policy.
 - 5.3 After closed jobs have been quality controlled through the desk audit, the data should not be changed unless it's imperative to the accuracy of the job.
 - 5.3.1 Discovery of any discrepancies in closed jobs data may require CEO to follow up and provide additional requests/guidance if needed.



CEO-WAP-702

Fuel Consumption Data

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO WAP: [401](#), [301 A6-A11](#)

1. Abstract

1.1 Subgrantees of the Colorado Energy Office Weatherization Assistance Program (CEO WAP) may obtain access to fuel consumption data on units served.

2. Consumption Data

2.1 Subgrantees may collect pre-weatherization utility consumption data from the client and evaluate it prior to weatherization.

2.1.1 This data may assist in targeting services that will have the greatest impact or return on investment.

2.1.2 If subgrantee uses this data to prioritize services, they must have an equitable process for all applicants.

2.2 **For centrally heated multifamily buildings, pre-weatherization utility consumption data for a minimum of 12 months is required.**

3. Utility Consent Forms

3.1 Subgrantees are responsible for ensuring utility data consent forms for jobs on which utility data sharing agreements are required. See CEO WAP 301 A6-A11.

3.2 CEO WAP may elect to retrieve post-weatherization consumption data on randomly selected units in order to perform energy savings evaluations.



COLORADO

Energy Office

Weatherization Assistance Program

CEO-WAP-703

Rebate Reporting

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO WAP: [703 A1](#)

1. Abstract

1.1 This policy specifies the responsibilities of subgrantee staff in understanding utility rebates contracted between CEO and utility providers in Colorado.

2. Overview

2.1 Rebatable measures are defined by participating utilities.

2.2 The amount of the rebate and the criteria to qualify for the rebate are also defined by participating utilities.

2.3 Budgets, rebate criteria, and reporting requirements vary by each utility.

2.4 Rebate information will be provided to subgrantees on an annual basis, based on contract agreements established between CEO and the utility provider.

3. Participating Utilities

3.1 See CEO-WAP-703 A1.

4. Subgrantee Rebate Responsibilities

4.1 Subgrantees must ensure all required measure information is entered into Salesforce accurately, as that data is essential for obtaining rebates.

5. Rebate Conditions

5.1 See CEO-WAP-703 A1.



CEO-WAP-801

Energy Audit

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [401](#), [701](#), [802](#), [803](#), [808](#), [901](#), [703 A1](#), [801 A2](#), [802 A2](#), [802 A3](#), [A9](#), [A10](#);
[WPN 22-7](#); [10 CFR 440](#)

1. Abstract

- 1.1 In accordance with the Colorado Energy Office Weatherization Assistance Program (CEO WAP) and the Department of Energy (DOE) all homes which are approved for weatherization must have a site-specific audit performed by a certified staff member before any work is done in the home.
- 1.2 This policy will detail the requirements for completing a comprehensive and approved energy audit.

2. Initial Assessment Summary

- 2.1 The audit is the initial assessment of the home and interaction with the client. The field audit must include at least the following activities:
- 2.2 An assessment of structural, health and safety hazards, and overall air quality which includes, but is not limited to:
 - 2.2.1 Moisture
 - 2.2.2 Mold
 - 2.2.3 Evidence of past moisture problems
- 2.3 **An inspection of the condition of:**
 - 2.3.1 All attics, including wiring and electrical splices
 - 2.3.2 Heat sources
 - 2.3.3 Air leakage
 - 2.3.4 Bypasses
 - 2.3.5 Mechanical ventilation
 - 2.3.6 Venting
- 2.4 **An assessment of:**
 - 2.4.1 Site drainage
 - 2.4.2 Chimneys
 - 2.4.3 Other vent locations/conditions
 - 2.4.4 General roof condition
 - 2.4.5 Other energy related health and safety hazards
 - 2.4.6 Window/door condition



- 2.5 Information Collection:**
 - 2.5.1 Record the existing conditions of the dwelling
 - 2.5.2 Mechanical systems.
- 2.6 Dwelling Evaluation:**
 - 2.6.1 Existing conditions for energy conservation opportunities
 - 2.6.2 Energy-related health and safety problems.
- 2.7 Dwelling Strategy:**
 - 2.7.1 Develop a strategy for improved energy efficiency and for correcting energy-related health and safety problems.
- 3. Client Interview**
 - 3.1 Subgrantee auditors are required to conduct on-site interviews with weatherization clients prior to any assessments or work being performed.
 - 3.2 This interview process should provide the auditor with enough background information to:
 - 3.2.1 Properly identify hazards that exist
 - 3.2.2 Assist in the identification of any health and safety issues
 - 3.2.3 Gain a better understanding of energy conservation opportunities
 - 3.3 Specifically, auditors should tailor the interview process to gain greater information in regard to the following areas:
 - 3.3.1 Problem identification, such as dwelling use, heating and cooling habits, and comfort issues.
 - 3.3.2 Discuss energy conservation opportunities and health and safety issues with the client.
 - 3.3.3 Information about CEO WAP, including services provided by the program and strategies that the client could employ to reduce their energy use.
 - 3.4 Use the subgrantee measures portfolio to demonstrate potential methods of installing measures, such as wall insulation and patching.
 - 3.5 Determine the most efficient work-flow for completing the job.
 - 3.5.1 Talk to the client about scheduling crews and their availability.
 - 3.6 Inform the client and/or owner about any hazards.
 - 3.7 Give all clients whose homes were built before January 1, 1978 an EPA Renovate Right pamphlet.
 - 3.7.1 A client signature indicating receipt of the Renovate Right pamphlet is required to be included in the client file.
- 4. Audit Libraries**
 - 4.1 All subgrantees are required to update their audit libraries at least once per year.



- 4.2 All new audits conducted for the following program year must be done with the updated software library.
- 4.3 All subgrantees must include the DOE approved Social Cost of Carbon (SCC) in addition to their typical fuel costs in WA WEB when running all audits.
 - 4.3.1 Subgrantee offices are required to update fuel costs by the SCC fuel price modifier in energy modeling tools.
 - 4.3.2 The exact fuel price modifiers for each fuel analyzed is as follows:
 - 4.3.2.1 Electric emissions add 1.99 cents/kilowatt hour (kWh) to electric costs (\$0.0199/kwh).
 - 4.3.2.2 Natural Gas (NG) emissions add 28.04 cents/therm to NG costs (\$0.2804/therm).
 - 4.3.2.3 Liquid Propane (LP) emissions add 30.48 cents/gallon to LP costs (\$0.3048/gallon).
- 5. **Audit Tool Requirements**
 - 5.1 **Single Family Audits**
 - 5.1.1 Require the use of the National Energy Audit Tool (NEAT) or Manufactured Home Energy Audit (MHEA) for each unit being assessed.
 - 5.2 **Multifamily Audits**
 - 5.2.1 Weatherization Assistant audit software will be used for centrally heated multifamily buildings.
 - 5.2.2 Energy analysis through DOE2 based analysis is preferred when cooling system replacements are considered.
 - 5.2.3 NEAT may also be used for multifamily buildings with twenty-five or less units.
 - 5.3 Other audit softwares are recognized by DOE, but must be pre-approved by CEO WAP prior to use.
- 6. **Initial NEAT/MHEA Assessment**
 - 6.1 The initial assessment of all mandatory, and any selected non-mandatory, energy conservation measures for single family units within the NEAT/MHEA software will be run to establish if an assessed measure meets the Savings to Investment Ratio (SIR) of 1.0 or greater.
 - 6.1.1 All ECM that have a SIR 1.0 or greater must be installed if feasible. If not feasible the reasons must be documented in the client file. If the measure is deemed not feasible it must be removed from the recommended measure report.
 - 6.1.2 The cumulative SIR for the job must be 1.0 or greater.



- 6.2 Heating Systems without an SIR of 1.0**
 - 6.2.1 All existing primary non-condensing heating systems must be evaluated for replacement with condensing, high-efficiency heating systems and installed if feasible.
 - 6.2.2 The heating system individual measure SIR is allowed to be below 1.0 provided:
 - 6.2.2.1 The cumulative job SIR is 1.0 or greater
 - 6.2.2.2 Non-DOE funds are used for the individual measure; the rest of the project can be funded by DOE
- 6.3 Cooling systems will be taken into consideration and modeled on the cooling load tab within the NEAT/MHEA.**
 - 6.3.1 The replacement of cooling systems is optional.
- 6.4 Measures from the audit and any applicable re-run audits must be included in the work order and client file.**
- 6.5 The Manufactured Home Energy Audit (MHEA) should be used to evaluate measures for manufactured homes.**
 - 6.5.1 When a manufactured home has characteristics that cannot be accurately represented in MHEA, the NEAT may be used for evaluation purposes.
- 7. Hazard Assessment**
 - 7.1 To safeguard the lives and well-being of both subgrantee employees and weatherization clients, auditors are required to conduct a hazard assessment during the initial home audit, prior to the beginning of any weatherization work.**
 - 7.2 Identified hazards must be documented and corrected before work proceeds, if such repairs are cost effective and feasible.**
 - 7.2.1 Where problems are beyond the scope of the program, the homeowner and the client must be notified of the problem(s) in writing and an explanation of the deferral process must be discussed and documented. The following areas must be assessed for hazards and addressed if found to be deficient:
 - 7.3 Indoor Air Quality and Ventilation**
 - 7.3.1 The energy audit shall include inspection of air infiltration sources, air barriers, and ventilation.
 - 7.3.2 Consider the house ventilation as a system, including both whole-building ventilation and local exhaust ventilation.
 - 7.3.3 Identification of sources of indoor air pollutants; chemicals posing a health risk to workers or clients.
 - 7.3.4 For houses with an attached or “tuck under” garage, identification of joints, seams, penetrations, openings between



door assemblies and their respective jambs and framing, and other sources of air leakage through walls and ceilings separating the garage from the residence and its attic area.

- 7.3.5 Evaluation of terminations of all exhaust fans and clothes dryer vents. All clothes dryers must vent to the outdoors in all building types. Except for condensing dryers
- 7.3.6 Evaluation of existing ventilation systems in the dwelling.
- 7.3.7 Inspection of clothes dryer vents for restrictions, lint build-up, and appropriate venting configuration.
- 7.3.8 All gas dryers must be vented with “gas rated materials”.
- 7.3.9 Determination of the ventilation needs. Calculation of minimum ventilation rate using ASHRAE 62.2.2016. Mechanical ventilation may be necessary based on pre-existing indoor air quality issues. Calculate the Air Changes per Hour @ CFM50 (ACH @ CFM50). Assessment for non-DOE units. Calculation: $CFM50 \text{ final or estimated final} \times 60 \text{ divided by volume}$ ($CFM50 * 60 / \text{volume}$). If 3 ACH @ CFM50 or less an ASHRAE assessment is required.

7.4 Moisture Control

- 7.4.1 Energy audit shall include the following:
 - 7.4.1.1 An inspection for evidence of exterior water intrusion, such as roof leaks, foundation leaks, fenestration assembly leaks, and groundwater intrusion.
 - 7.4.1.1.1 Homes with non-correctable standing water will not be considered for a closed crawl space.
 - 7.4.1.1.2 Inspection for evidence of damage caused by interior water sources, such as plumbing leaks or condensation on piping, ductwork, or other interior surfaces.
 - 7.4.1.1.3 Inspection for effects of water damage on buildings, such as structural damage, mold, mildew, efflorescence, and stains.
 - 7.4.1.1.4 Identification of existing vapor retarders, flashing, gutters, or other moisture-control strategies.

7.5 Structural & Other Problems

- 7.5.1 Roofing condition
- 7.5.2 Window and door condition
- 7.5.3 Siding condition
- 7.5.4 Foundation condition
- 7.5.5 Interior wall, floor, and ceiling condition
- 7.5.6 Homes under renovation or under construction



7.6 Asbestos

- 7.6.1 All suspect asbestos containing material (SACM) that will be affected by the weatherization work must be assessed. SACM samples may be obtained by a qualified certified Asbestos Building Inspector for testing by a certified laboratory sample as required.
- 7.6.2 If testing will not be conducted, the SACM must be considered “presumed asbestos containing materials” (PACM) and must follow OSHA Class I - IV regulations for removal up to 25 linear feet for thermal system insulation (TSI) or surfacing material and or 10 square feet of material wall board or similar material.
- 7.6.3 Working wet is the preferred method whenever feasible. Blower door testing is not allowed, be it pressurization or depressurization, unless testing results prove negative - for friable asbestos or vermiculite material.
- 7.6.4 If friable asbestos materials can be encapsulated prior to blower door testing, then blower door testing is allowed. See CEO-WAP-802.

7.7 Electrical Wiring

- 7.7.1 An electrical wiring inspection assessment must be conducted. These requirements are for all housing eligible WAP housing types:
 - 7.7.1.1 Inspect and assess the house to identify knob and tube wiring. Non-contact testing methods must be used to determine if wiring is live.
 - 7.7.1.2 The home electrical circuit to which the new refrigerator will be directly connected and installed must be grounded. Repairs to ground the outlet and/or circuit must be charged as an IRM associated with the refrigerator.
 - 7.7.1.3 Before installing insulation over electrical wiring the following must be assessed and corrected:
 - 7.7.1.3.1. Wiring types #14 Copper or #12 aluminum should be protected by a fuse or breaker rated for no more than 15 amps.
 - 7.7.1.3.2. Wiring types #12 copper or #10 aluminum should be protected by a fuse or breaker rated at no more than 20 amps.
 - 7.7.1.3.3. S-type fuses must be installed to replace T base fuses.



- 7.7.1.3.4. Outlets and switches must be checked and documented prior to installing insulation in walls or ceiling cavities.
- 7.7.1.3.5. Wiring splices must be enclosed in metal or plastic electrical boxes and fitted with cover plates before being covered with insulation.

7.8 Lead Paint

- 7.8.1 Presence of lead-based paint in pre-1978 homes will be assumed unless testing confirms otherwise.
- 7.8.2 The Environmental Protection Agency (EPA) Renovation, Repair, and Painting (RRP) Program Rule (40 CFR Part 745) in pre-1978 homes and proposed changes to this rule (Federal Register/Vol. 75, No. 87/May 6, 2010) will be complied with, to be superseded by any subsequent final rulemaking or any more stringent state or federal standards.

7.9 Hazard Notification

- 7.9.1 When serious safety problems are discovered that require weatherization work to be terminated, workers must:
 - 7.9.1.1 Contact their supervisor.
 - 7.9.1.2 Inform the customer and/or owner about the hazards.
 - 7.9.1.3 Document within the file that owners and clients were notified of health and safety problems.
 - 7.9.1.4 Notify clients and/or owners in writing if work will not continue until the owner corrects the problem.

8. Emergency Assessment

- 8.1 All hazardous situations, including gas leaks, fire hazards, carbon monoxide(CO), etc. that present an immediate threat, require immediate action. At a minimum, this includes notifying the client and contacting a supervisor.
 - 8.1.1 Clients may not be left without heating during the heating season.
 - 8.1.2 Subgrantees may loan only closed coil electric space heaters to clients without heat.
 - 8.1.3 If there is a strong smell of leaking gas, workers must tell the client and ask them to leave the home.
 - 8.1.3.1 The auditor must leave the home and call either their supervisor, the utility company, or 911, depending on the seriousness of the matter.
 - 8.1.3.2 Subgrantees must have an emergency medical procedure in place and workers must be trained on those procedures.



9. Health and Safety Assessment

9.1 Subgrantees must conduct health and safety assessments of all units as a part of the audit process. Auditors must, at a minimum, assess the following issues:

- 9.1.1 A health and safety inspection form completed and signed by the client; the agency must then leave a signed copy of the form with the client and the original must be kept in the client file. See CEO-WAP-802 A10.
- 9.1.2 Evaluation of combustion appliances and testing in accordance with Combustion Appliance Assessment section of this policy.
- 9.1.3 Evaluation of ventilation needs in accordance with Indoor Air Quality and Ventilation section of this policy.
- 9.1.4 Identification of existing and/or potential moisture issues in accordance with Moisture Control of this policy.
- 9.1.5 Identification of areas containing known or suspected hazardous materials including, but not limited to, lead, asbestos, and mold.
- 9.1.6 Visual inspection and testing for the existence of live knob and tube wiring.
- 9.1.7 Identification of obvious electrical hazards.

10. Combustion Appliance Assessment

10.1 Ambient CO will be monitored during combustion testing and testing will be discontinued if ambient CO level inside the home or work space exceeds 35 parts per million (ppm).

- 10.1.1 If CO levels are over 35 ppm, subgrantee staff must turn off the appliance, vent area, and investigate the source.

10.2 Raw fuel leaks will be monitored before entering building spaces.

- 10.2.1 If leaks are found, testing will be discontinued and the condition must be reported to the occupant immediately
- 10.2.2 Testing for gas leakage at connections of natural gas and propane piping systems will be completed.
- 10.2.3 Leakage will be located using an approved combustible gas detector, a non-corrosive leak detection fluid, or an equivalent non-flammable solution.
- 10.2.4 Matches, candles, open flames, or other methods that could provide a source of ignition cannot be used.
- 10.2.5 Where leakage or other defects are located, the affected portion of the piping system will be repaired or replaced and subsequently retested.

10.3 Appliances will be examined for signs of damage, misuse, improper repairs, and lack of maintenance.



- 10.4** Combustion venting systems will be inspected for damage, leaks, disconnections, inadequate slope, and other safety hazards.
 - 10.4.1** Testing will be completed with the Combustion Appliance Zone (CAZ) under worst case depressurization conditions. See CEO WAP-801 A2.
- 10.5** Spillage testing must be completed for all natural draft space heating systems and water heaters.
 - 10.5.1** Spillage must first be tested under worst case conditions and then repeated for natural conditions if the appliance fails under the worst-case scenario.
 - 10.5.2** If an appliance fails spillage at worst case depressurization, specify measures to correct CAZ depressurization (e.g. room pressure relief, additional combustion air, sealing return duct leakage) (Variance Request Approval).
 - 10.5.3** With the CAZ in the worst case depressurized state, test spillage on the smallest BTU appliance first.
 - 10.5.3.1** If spillage in a combustion appliance with a warm vent or domestic water heater exceeds two minutes during pressure testing, measures will be specified to mitigate. Similarly, if spillage in a combustion appliance with a cold vent exceeds five minutes during pressure testing, measures will be specified to mitigate.
- 10.6** CO will be tested for in undiluted flue gasses of combustion appliances.
 - 10.6.1** If CO levels exceed 200 ppm as measured, or 400 ppm air-free measurement, service will be provided to reduce CO to below these levels (unless CO measurement is within manufacturer specifications).
 - 10.6.2** If the outlet of the exhaust is accessible, include a CO test on all sealed-combustion, direct vent, and power-vented appliances without atmospheric chimneys.
- 10.7** Heat exchangers must be inspected for cracks.
- 10.8** Gas ovens must be tested for CO.
 - 10.8.1** A clean and tune will be conducted if the measured CO in the undiluted flue gasses of the oven vent at steady state exceeds 225 ppm or 800 ppm by air-free measurement.
- 10.9** Gas range burners may be tested.
 - 10.9.1** Specifically clean and tune if the flame has any discoloration, flame impingement, or an irregular pattern or if burners are visibly dirty, corroded, or bent.



- 10.10 Work will be stopped on rental units where the furnace is unsafe and will be replaced until the owner has agreed to participate in the replacement cost.
- 10.11 Solid fuel burning appliances must be inspected and assessed for safe operating conditions.
 - 10.11.1 If the solid fuel burning appliance is the primary heat source and has signs of structural failure, replace solid fuel burning appliances with UL-listed and EPA-certified appliances if the existing appliance is not UL-listed.
- 11. **Unvented Space Heaters**
 - 11.1 With the occupant's permission, unvented heaters will be removed, except when used as a secondary heat source, and when it can be confirmed that the unit is listed to ANSI Z21.11.2
 - 11.2 Units that are not being operated in compliance with ANSI Z21.11.2 must be removed before the retrofit but may remain until a replacement heating system is in place.
 - 11.2.1 Failure to remove unvented space heaters serving as primary heat sources has the potential to create hazardous conditions and thus any further weatherization services will be re-evaluated in the context of potential indoor air quality risks.
 - 11.3 Improper heating system installations require remedies prior to continuing work. These systems include, but are not limited to:
 - 11.3.1 Combustion heating systems situated in a bedroom, bathroom, or closet that are not a sealed combustion system.
 - 11.3.2 Furnaces that have no cold air return and no easy place to put one.
 - 11.3.3 Furnaces that have no service access.
 - 11.3.4 Mobile homes with non-mobile home type furnaces.
 - 11.3.5 Any unvented combustion heater.
 - 11.3.5.1 Permanently disable or vent (with client/owner permission) the appliance.
 - 11.3.6 Any furnace that is installed in a dangerous manner and cannot be repaired.
- 12. **Carbon Monoxide, Smoke Alarms, and Fire Extinguishers**
 - 12.1 Every home receiving CEO WAP must have at least one functioning carbon monoxide alarm and smoke alarm.
 - 12.1.1 CO detection or warning equipment will be installed outside of each separate sleeping area in the immediate vicinity of the bedrooms in accordance with ASHRAE 62.2 and authority having local jurisdiction.



- 12.1.2 Existing carbon monoxide and/or smoke alarms may be made operable if non-functioning.
- 12.1.3 Smoke alarms are allowed to be installed individually or as combination smoke and CO units.
- 12.1.4 Smoke alarms will be permitted to be battery operated when installed in buildings without grid power unless there is an attic, crawlspace, or basement available which could provide access. Subgrantees are to consult local code requirements regarding power options for CO and smoke alarms.
- 12.1.5 Smoke alarms must be installed within 12 inches of the ceiling.
- 12.2 Fire extinguishers may be installed in homes with solid fuel burning appliances.
- 13. **Mandatory Energy Conservation Measure Assessments**
 - 13.1 Subgrantees must perform a site-specific audit in order to establish which measures are cost-effective.
 - 13.2 Subgrantees must use the following criteria to establish which ECMs are appropriate for each individual unit:
 - 13.2.1 Insulation assessment specifications in single family homes
 - 13.2.1.1 Attic, Wall (Blown), Wall (Knee wall), Sillbox, Foundation Wall, Floor. Mobile Homes: Ceiling Cavity, Wall, Floor/Belly, Perimeter. Insulation Assessment must include:
 - 13.2.1.1.1 Measuring the building's dimensions.
 - 13.2.1.1.2 Documenting the net wall and attic square footage.
 - 13.2.1.1.3 Determining and documenting the thermal boundary; defined as the separation between the interior and exterior environments of a building that slows heat flow and is typically the alignment of the air and insulation boundary.
 - 13.2.1.1.4 Enclosed insulated cavities must be verified with a minimum 2 ½" inspection hole per homogeneous area of home.
 - 13.2.1.1.5
 - 13.2.1.1.6 Locating and documenting crawl space/basement entrance.
 - 13.2.1.2 Additions to the dwelling.
 - 13.2.1.2.1 Inspection of the attic(s) for the presence, depth, and type of insulation.
 - 13.2.1.2.2 Notation of any evidence of moisture transport, condition, and amount exposed above exterior grade at the perimeter foundation and basement walls.



- 13.2.1.3 Check exterior walls for insulation, cavity depth, and batt thickness.
- 13.2.1.4 Check remodeled areas and additions separately.
- 13.2.1.5 Check the crawlspace, belly, or basement box sills for insulation.

13.3 Insulation assessment specifications in manufactured homes

- 13.3.1 Assessment and documentation of the ceiling cavity size and the existing R-value (near the center).
 - 13.3.1.1 For pitched roofs, input additional insulation to be added to the existing insulation, not cavity size, in MHEA
- 13.3.2 Sealing and repairing of roofs must be completed to prevent leaks when insulation is added to the roof and be assessed as an IRM associated with an ECM.
- 13.3.3 Assessment and documentation of the following is required:
 - 13.3.3.1 Wall cavity size, insulation batt size, and the existing R-Value
 - 13.3.3.1.1 Belly wings and center may be different cavities and batt sizes.
 - 13.3.3.1.2 The use of a manufactured home data plate which lists the insulation levels of the home may be used if insulation levels are verified by probing enclosed cavities.
 - 13.3.3.2 The perimeter/skirting, height, length and existing R-value.
- 13.3.4 Assessment of the floor/belly of the manufactured home is required in MHEA specifically as "belly"
 - 13.3.4.1 If the belly is cost-effective to insulate, the perimeter may be insulated to a minimum of R-11 encapsulated in 6-mil plastic without repairs to the belly, or the belly can be insulated and repairs made to complete the air/thermal boundary.
 - 13.3.4.2 When the belly is not cost effective to insulate, repairs can be made, such as stuff and patch, as an Air Leakage Energy Conservation Measure or an IRM associated with an Energy Conservation Measure
- 13.3.5 Belly return systems must be sealed and return air grills must be installed in the furnace closet door, or through a wall, for a return air path to the furnace.



13.4 Baseload Measure Requirements

- 13.4.1 Baseload measures include: Refrigerator, Water Heater Tank and Pipe Insulation, Boiler Pipe Insulation, High Efficiency Shower Heads and Faucet Aerators, Compact Fluorescent Light bulbs or LED bulbs.
- 13.4.2 Evaluation Requirements on baseload measures are as follows:
 - 13.4.2.1 Evaluation of refrigerator energy consumption via a database or metering.
 - 13.4.2.1.1. At least 10 percent of replacement refrigerators must be metered.
 - 13.4.2.1.2. Refrigerators that are more than five years old must be assessed for replacement.
 - 13.4.2.2 Evaluation of water heater fuel type, size, location, condition, R-value of tank insulation, and efficiency.
 - 13.4.2.3 Assessment of Water heaters for additional tank insulation regardless of location
 - 13.4.2.3.1. Insulation must be installed if it is cost effective.
 - 13.4.2.4 Evaluation of potential efficiency upgrades.
 - 13.4.2.5 Evaluation of water usage of shower heads and faucets.
 - 13.4.2.6 Evaluation of lighting efficiency upgrades.
- 13.4.3 If the client declines the measure, or the landlord declines, and the auditor deems it as a legitimate reason per measure skipping policy, no further assessment is required. Document reasoning on the field audit and get signatures as feasible.

13.5 Duct Sealing and Insulation Requirements

- 13.5.1 Blower door CFM50 assessment must be completed.
 - 13.5.1.1 Reasons not to conduct a blower door assessment include an active fire in a solid burning appliance and friable asbestos
 - 13.5.1.1.1. Reasoning for not completing this assessment must be documented in the file.
- 13.5.2 Measurement and documentation of major air leakage holes and bypasses must be completed..
- 13.5.3 Calculation of the minimum ventilation rate using ASHRAE 62.2.2016.
 - 13.5.3.1 Mechanical ventilation may be necessary based on pre-existing indoor air quality issues.
 - 13.5.3.2 Calculate the air changes per hour at CFM50 (ACH at CFM50) for non-DOE units.



- 13.5.3.2.1. Calculation: CFM50 final or estimated final, multiplied by 60 then divided by volume (CFM50 * 60/volume).
- 13.5.3.2.2. If the result is 3 ACH or less, an ASHRAE assessment is required.
- 13.5.4 Ducts outside the thermal boundary must be assessed using either pressure pan diagnostic testing, whole house subtraction method, or duct blaster.
- 13.5.5 Ducts outside the thermal boundary that test under 1.0 Pascal for pressure pan testing are not required to be sealed.
- 13.5.6 Ducts within the thermal boundary do not have to be assessed, however visible duct leaks should be sealed as an IRM associated with crawl space insulation or another associated ECM.
- 13.5.7 A visual inspection is to be conducted of accessible ductwork
- 13.6 Storm Window Requirements**
 - 13.6.1 Single pane windows must be assessed for the addition of a storm window or they may be assessed for a double pane replacement window at the thermal boundary including basement areas
 - 13.6.1.1 Double pane windows may also be assessed for storm window addition.
 - 13.6.2 Egress windows and doors must not be made to prevent entry or exit in the case of an emergency. This requirement supersedes all other requirements.
- 13.7 Ductwork for Manufactured Homes**
 - 13.7.1 Ductwork must be assessed for damage, debris, and leakage.
 - 13.7.2 The confirmation of all ductwork connections must be ensured.
 - 13.7.3 Pressure pan testing must be performed and documented pre and post duct sealing.
 - 13.7.3.1 Duct testing of pressure pans at 1.0 Pascal or less does not require sealing.
 - 13.7.4 Ductwork that obstructs impeding air flow must be corrected.
 - 13.7.4.1 Duct repairs (i.e. boot repairs) duct cleaning may be included as IRM associated with duct sealing.
 - 13.7.5 The furnace plenum connection to the main trunk line must be sealed, if cost effective and duct sealing is performed.
 - 13.7.6 Newly-installed crossover ducts must be installed as straight as possible, mechanically fastened at both inner and outer liner, properly sealed and insulated to a minimum of R-8.
 - 13.7.6.1 Whenever possible, rigid-elbow or equivalent will be installed in crawl space crossover ducts.



- 13.7.6.2 Whenever feasible, a 26 gauge rigid duct must be installed.
 - 13.7.7 Crossover ducts will be installed so they are not in contact with the ground.
 - 13.7.8 Only un-insulated ducts outside the thermal boundary are required to be insulated to a minimum of R-8.
 - 13.7.8.1 If there is any existing duct insulation, additional insulation is not required.
 - 13.7.8.2 Gaps in existing insulation must be patched.
 - 13.8 Heating System Replacements and Smart Thermostats**
 - 13.8.1 Evaluation of heating appliance(s) operation, condition, and efficiency.
 - 13.8.2 Evaluation of heating and cooling distribution system/s operation, condition, and efficiency.
 - 13.8.2.1 The R-value of the duct system must be included.
 - 13.8.3 Assess and evaluate the existing thermostat for ECM replacement with a Smart or programmable thermostat.
 - 13.8.4 Assess and evaluate the heating system for ECM replacement.
 - 14. Optional Energy Conservation Assessment Measures**
 - 14.1** Subgrantees may choose to assess the following non mandatory ECMs for each unit, and may install the measure if the measure has an SIR of 1:0 or greater:
 - 14.1.1 Replacement windows, low-E windows, window shading, sun screens, (fabric or louvered), or window film
 - 14.1.2 Electric vent dampers & IID
 - 14.1.3 Flame retention head oil burners
 - 14.1.4 Water heater fuel conversion
 - 14.1.5 Cooler covers
 - 14.1.6 Air-conditioner tune-up or replacement for energy efficiency
 - 14.1.7 Water heater tank replacement
 - 14.1.8 Basement wall insulation
 - 14.1.9 Rooftop solar photovoltaic power system
 - 15. Mandatory Energy Usage Assessment**
 - 15.1** Assessment of the energy use information and comparison to the condition of the home should be completed.
 - 15.1.1 If energy use information is unavailable, use the condition and size of the building shell and heating system as an indicator of actual energy use.
 - 15.2 Predictors**
 - 15.2.1 Space heating energy use is to be used as a predictor of potential combustion appliance replacement savings.



15.2.2 Baseload energy use is to be used as a predictor of potential savings from the provision of client education and/or from baseload measures, including a potential refrigerator replacement.

16. Measure Skipping

16.1 In the event that the building owner, or occupant, refuses a measure and client education techniques are unsuccessful in persuading the building owner or occupant to install the measure, the auditor must deem the option to skip a measure as legitimate or non-legitimate.

16.1.1 If deemed as a legitimate reason for a measure to be skipped, all other cost effective weatherization measures should be installed per the standard installation process.

16.1.2 Documentation supporting skipping the measure must be included in the client file.

16.1.2.1 Client files which do not contain proper documentation may result in disallowed costs for that, or all job measures.

16.2 If deemed as a non-legitimate reason for measure skipping, only measures with a higher SIR may be installed.

16.2.1 All measures below the skipped measure may not be installed.

16.2.2 Installation of measures below the skipped measure may result in disallowed costs for that, or all job measures.

16.3 The following examples are illegitimate reasons for measure skipping:

16.3.1 Untrained staff on the installation of a measure.

16.3.1.1 Subgrantees are required to have trained staff, or subcontractors, available to install all cost-effective measures.

16.3.2 Cosmetic appearance of finished work.

16.3.3 Objection to a certain material installed.

16.3.3.1 Subgrantees are allowed to re-run an audit with alternative materials and costs to determine cost effectiveness.

16.3.4 Additional associated health and safety issues.

16.3.4.1 ECM may not be skipped in an attempt to avoid additional health and safety costs or job requirements.

16.3.5 Other reasons which attempt to circumvent the spirit of, or verified approaches to, obtaining maximum cost effectiveness for the program.



17. Work Order Determination and Development

17.1 Energy Conservation Measure (ECM)

- 17.1.1 Defined as a procedure, including weatherization materials and installation, which is considered or performed for its anticipated energy savings.
- 17.1.2 Ancillary Items: Items necessary for the proper installation of energy conservation materials are included in the cost of the ECM.
- 17.1.3 Rooftop Solar Photovoltaic System (Rooftop Solar)
 - 17.1.3.1 Subgrantees may evaluate the potential for a rooftop solar photovoltaic system as an optional ECM and the system must have a SIR of 1.0 or greater.
 - 17.1.3.2 The maximum Department of Energy (DOE) cost of \$4,047 for rooftop solar or renewable systems shall not be exceeded. See CEO WAP 808.

17.2 Incidental Repair Measure (IRM)

- 17.2.1 Defined as a repair that is necessary for the effective performance or preservation of weatherization materials.
 - 17.2.1.1 IRMs must be associated with an ECM
 - 17.2.1.1.1. In Salesforce, “EC Incidental Repair” is a “record type” captured within the EC category.
- 17.2.2 IRM requires cost justification through the electronic energy audit; however, they are not to be included with the cost of an ECM.
- 17.2.3 Written justification for the necessity of the repair, as well as photo documentation, must be in the client file and the repair must be associated with an ECM identified on the Recommended Measures Report.
 - 17.2.3.1 Include the documentation in the comments section of the ECM that the IRM is associated with the NEAT or MHEA.

17.3 Health and Safety Repair

- 17.3.1 Defined as allowable measures that are necessary to maintain the physical well-being of both the occupants and/or weatherization workers where the actions must be taken in order to effectively perform weatherization work or are necessary because of weatherization activities.
- 17.3.2 Reasonable Costs are those which do not cause a subgrantee to exceed their annual per-unit average allowance.
- 17.3.3 Determine from the site-specific audit recommended measure report which measures are cost-effective.



- 17.3.4 Only ECM measures that have a SIR of 1.0 or greater may be installed.
- 17.3.5 Select energy related health and safety problems to correct.
 - 17.3.5.1 All health and safety repairs will be listed on the NEAT/MHEA recommended measure report.
- 17.3.6 In those instances where the measure can be considered either a Health and Safety measure or an ECM as the measure has a cost-effective savings-to-investment ratio (SIR) of one (1.0) or greater, the measure should be treated as an ECM. See WPN 22-7.
- 17.4 Determination of the necessity for each potential IRM is required.
 - 17.4.1 Incidental repairs must be listed on NEAT/MHEA recommended measure report and a cumulative SIR (total project) of 1.0 must be maintained.
- 17.5 Crews or contractors must be provided a work order with detailed specifications, as necessary, to understand the materials and procedures necessary to complete the job.
 - 17.5.1 Calculation of the estimated number of insulation bags, rolls of insulation, or other materials needed to complete the job must be included.
- 17.6 Crews or contractors must be notified of any hazards, pending repairs, and important procedures related to their part of the work order.



CEO-WAP-802

Health & Safety

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [403](#), [801](#), [803](#), [804](#), [802 A2-A13](#); [10 CFR 440](#), [29 CFR 1910 & 192](#), [40 CFR 745](#); [WPN22-7](#)

1. Abstract

1.1 This policy details the measures which must be taken in order to complete weatherization work safely as well as those measures which may be considered Health & Safety Measures (H&S).

2. General Health and Safety Requirements

2.1 The health and safety of clients, staff, and contractors, as well as the integrity of the building structure, must not be compromised by any work completed with CEO WAP funding.

2.2 It is the subgrantee's responsibility to initiate and maintain programs that comply with Occupational Safety and Health Association (OSHA) Regulations 29 CFR 1910 & 1926, and any other applicable federal and state laws enacted to protect worker safety.

2.3 All subgrantee field staff are required to be trained on and have access to necessary personal protective equipment (PPE).

2.3.1 The use of personal protective equipment shall be strictly enforced. Respirators, protective eyewear, and protective clothing must be worn when there is suspicion or knowledge that biological agents may be present in order to eliminate or minimize crew exposure.

2.4 Subgrantees and their contractors are required to follow procedures to protect their clients from hazardous materials and dust.

2.5 Weatherization services must be deferred until health and safety problems, beyond the scope of CEO WAP, are resolved. See CEO-WAP-403 & 801.

2.5.1 Building owners and clients must be notified in writing of any health or safety problems that require weatherization work to be terminated.



- 2.6 Energy Conservation Measures**
 - 2.6.1 No health and safety measure can be performed in a unit unless an ECM is also part of the scope of work.
 - 2.6.2
- 2.7 Incidental Repair Measures**
 - 17.6.1.1 All Incidental Repair Measures (IRM) are to be associated with an energy conservation measure and must be assessed separately from the energy conservation measures in the computerized energy audit. The cumulative SIR must be cost effective.
- 2.8** Final combustion testing will be performed at the completion of each job.
- 3. Communication Requirements Regarding Safety**
 - 3.1** Building owners, clients, and/or landlords must be informed verbally and in writing immediately should the following health and safety concerns be found:
 - 3.1.1 Any pest problems that require weatherization work to be deferred or terminated
 - 3.1.2 The presence of any health and safety issue which will cause the deferral of the unit. See CEO-WAP- 403.
 - 3.1.3 When a mold problem is found.
 - 3.1.4 If transite siding is present it is considered suspected asbestos containing material and that precautions will be taken.
 - 3.2** Subgrantees are required to provide client education on radon and supply the “EPA Citizen’s Guide to Radon” pamphlet to the client. See Appendix A of 10 CFR 440.
- 4. Health and Safety Plan**
 - 4.1** Subgrantees must have in place and enforce a health and safety plan that includes:
 - 4.1.1 Compliance with state and federal requirements for worker and client health and safety.
 - 4.1.2 How safe work practices are to be followed.
- 5. Certification Requirements**
 - 5.1** Subgrantees are required to have a Colorado Certified Asbestos Inspector on staff.
 - 5.1.1 This staff person is responsible for regulatory compliance and for providing guidance to the subgrantee regarding asbestos-related situations and issues.
 - 5.2** All job sites require at least one person to be EPA Certified Renovators.



- 6. Installed Equipment Warranty and Service Agreement**
 - 6.1** A minimum one year warranty for materials, workmanship, and serviceability will be provided to occupants upon completion of work.
- 7. Common Health and Safety Repairs**
 - 7.1** The following items are health and safety related repairs allowed within the scope of CEO WAP:
 - 7.1.1** Heating system replacement due to an unsafe condition of the appliance that is irreparable.
 - 7.1.2** Carbon monoxide and smoke detectors.
 - 7.1.3** Carbon monoxide mitigation.
 - 7.1.4** Chimney cleaning/lining.
 - 7.1.5** Burner replacement.
 - 7.1.6** Installation of combustion-air duct.
 - 7.1.7** Materials to repair gas/propane leaks.
 - 7.1.8** Propane sniffer for below grade use.
 - 7.1.9** Water heater tank replacement due to an unsafe condition.
 - 7.1.10** Heat exchanger replacement.
 - 7.1.11** Installation of mechanical ventilation systems.
 - 7.1.12** Ground moisture barriers.
 - 7.1.13** Clothes dryer venting.
 - 7.1.14** Plumbing repairs.
- 8. Safe Work Practices**
 - 8.1 Clearance and Constraints**
 - 8.1.1** Work must be performed if there is at least 24 inches of clearance in the work area, and no other constraints exist.
 - 8.1.2** Work should be attempted in areas with less than 24 inches of clearance.
 - 8.1.2.1** Areas that cannot be addressed require documentation of a technical waiver and be included in the client file.
 - 8.2** Client files must include documentation of all safety tests and work done on combustion appliances.
- 9. Site Preparation**
 - 9.1** Site must be properly prepared for any weatherization work to proceed, this includes but is not limited to areas that may cause injury to workers or damage to installed weatherization measures must be addressed. may
 - 9.2** Crawl space upgrades (e.g., sealing and insulation) are to be undertaken after appliance and HVAC system work has been completed.
- 10. Safety Devices**
 - 10.1** Smoke detectors may be installed as a health and safety measure.



- 10.2 CO monitors must be installed in all homes.
- 10.3 When replacing existing thermostats, identification and disposal of any mercury-containing thermostats must be done in accordance with Environmental Protection Agency (EPA) guidance.
- 10.4 CO detection or warning equipment will be installed outside of each separate sleeping area in the immediate vicinity of the bedrooms in accordance with ASHRAE 62.2 and authority having local jurisdiction.
- 10.5 Where solid fuel burning equipment is present, fire extinguishers may be provided as an allowable health and safety measure.
- 11. **Visual Inspections**
 - 11.1 The presence of raw fuel leaks will be assessed before entering building spaces.
 - 11.2 If leaks are found, testing will be discontinued and the condition reported to the occupant immediately.
 - 11.3 Testing will be completed for gas leakage at connections of natural gas and propane piping systems.
 - 11.3.1 Leakage will be located using an approved combustible gas detector, a non-corrosive leak detection fluid or an equivalent non-flammable solution.
 - 11.4 Matches, candles, open flames, or other methods of testing that could provide a source of ignition may not be used.
 - 11.4.1 Where leakage or other defects are located, the affected portion of the piping system will be repaired or replaced and retested.
 - 11.5 Appliances must be examined for signs of damage, misuse, improper repairs, and lack of maintenance.
 - 11.6 Inspection of combustion venting systems for damage, leaks, disconnections, inadequate slope and other safety hazards must be completed.
 - 11.7 Heat exchangers must be inspected for cracks
- 12. **Carbon Monoxide Testing**
 - 12.1 CO monitors will be assessed and installed if none exist as all homes must have a functional CO monitor.
 - 12.2 CO detection or warning equipment will be installed outside of each separate sleeping area in the immediate vicinity of the bedrooms in accordance with ASHRAE 62.2 and authority having local jurisdiction.
 - 12.3 Fuel leaks will be tested and repaired.
 - 12.3.1 Raw fuel leaks will be monitored before entering building spaces.
 - 12.3.1.1 If leaks are found, testing will be discontinued and conditions reported to the occupant immediately.



- 12.4 Workers will monitor ambient CO levels while on the job site with a personal CO monitor.
 - 12.4.1 Ambient CO levels will not exceed 35 ppm.
 - 12.4.1.1 If levels are greater than 35 ppm work must stop, windows and doors must be opened, and an investigation and repair of high CO levels must be completed prior to any further weatherization work.
- 13. **Combustion Appliance Safety Testing at Worst Case Depressurized State**
 - 13.1 Spillage testing will be conducted on the smallest British Thermal Unit (BTU) appliance first.
 - 13.2 If spillage in a combustion appliance with a warm vent or domestic water heater exceeds two minutes during pressure testing, measures will be specified to mitigate.
 - 13.3 Similarly, if spillage in a combustion appliance with a cold vent exceeds five minutes during pressure testing, measures will be specified to mitigate. See CEO-WAP- 801.
 - 13.4 CO will be tested for within the undiluted flue gasses of combustion appliances.
 - 13.4.1 If CO levels exceed 200 ppm as measured, or 400 ppm air-free measurement, service will be provided to reduce CO to below these levels (unless CO measurement is within the manufacturer's specifications).
 - 13.4.2 If the outlet of the exhaust is accessible include:
 - 13.4.2.1 A CO test on all sealed-combustion, direct vent, and power-vented appliances without atmospheric chimneys. See CEO-WAP- 801.
 - 13.4.2.2 A CO test on all sealed-combustion, direct vent, and power-vented appliances, without atmospheric chimneys, will be included.
 - 13.5 Spillage testing must be completed for all natural draft space heating systems and water heaters
 - 13.5.1 When testing, the CAZ must be set under worst case depressurization conditions.
 - 13.5.1.1 If an appliance fails spillage or CO at worst case depressurization, specify measures to correct CAZ depressurization. See CEO-WAP-801 & 802 A1.
 - 13.5.2 Problems found during testing must be documented and corrected in an efficient and timely manner.



- 13.5.3 Inspection of combustion venting systems for damage, leaks, disconnections, inadequate slope and other safety hazards must be completed.
- 13.5.4 If leaks are found, testing will be discontinued and the condition reported to the occupant immediately.
- 14. Raw Fuel Testing**
 - 14.1** Liquid propane (LP) gas tanks shall be located outside of the home.
 - 14.1.1 If a LP gas tank is being used for space or water heating, it must be relocated outdoors, switched to electric, or the unit must be deferred.
 - 14.1.1.1 Relocating LP gas tanks is an allowable health and safety measure.
 - 14.2** The presence of raw fuel leaks will be assessed before entering building spaces.
 - 14.2.1 Testing will be done for leakage at connections of natural gas and propane piping systems.
 - 14.2.2 Leakage will be located using an approved combustible gas detector, a non-corrosive leak detection fluid or an equivalent non-flammable solution.
 - 14.2.2.1 Matches, candles, open flames, or other methods of testing that could provide a source of ignition may not be used.
 - 14.2.2.2 Where leakage or other defects are located, the affected portion of the piping system will be repaired or replaced and retested.
 - 14.3** Solid fuel burning appliances must be inspected and assessed for safe operating conditions.
 - 14.3.1 If the solid fuel burning appliance is the primary heat source and has signs of structural failure, it must be replaced with a solid fuel burning appliance with UL-listed and EPA-certified appliances
- 15. Unsafe Heating Systems**
 - 15.1** Improper heating system installations include, but are not limited to:
 - 15.1.1 Combustion heating systems situated in the bedroom, bathroom, or closet and not a sealed combustion system.
 - 15.1.2 Furnaces that have no cold air return and no easy place to put one.
 - 15.1.3 Furnaces that have no service access.
 - 15.1.4 Mobile homes with non-mobile home type furnaces.
 - 15.1.5 Any unvented combustion heater.
 - 15.1.5.1 Permanently disable or vent (with client/owner permission) the appliance.



- 15.1.6 Any furnace that is installed in any other dangerous manner and cannot be repaired.
 - 15.2 Unvented heaters will be removed, with the permission of the client, except when used as a secondary heat source and when it can be confirmed that the unit is listed to ANSI Z21.11.2.
 - 15.3 Units that are not being operated in compliance with ANSI Z21.11.2 should be removed before the retrofit but may remain until a replacement heating system is in place.
 - 15.4 Failure to remove unvented space heaters serving as primary heat sources has the potential to create hazardous conditions and thus any further weatherization services will be re-evaluated in the context of potential indoor air quality risks.
16. **Unsafe Water Heaters**
 - 16.1 Subgrantees must replace water heaters that create imminent health and safety concerns with a new water heater--unless the existing water heater can be effectively repaired--based on the process below:
 - 16.1.1 Evaluate the feasibility of installing a heat pump water heater (HPWH). If installation of an HPWH is feasible and preferred, install it. If not feasible, thorough documentation must be kept in the client file or in Salesforce and proceed to the next option.
 - 16.1.2 Evaluate the feasibility of installing a condensing tankless gas/propane water heater. If installation of a condensing tankless gas/propane water heater is feasible and preferred, install it. If not feasible, thorough documentation must be kept in the client file or in Salesforce, and proceed to the next option.
 - 16.1.3 Evaluate the feasibility of installing a direct vent/sealed combustion gas/propane storage water heater. If installation of direct vent/sealed combustion gas/propane storage water heater is feasible, install it. If not feasible, thorough documentation must be kept in the client file or in Salesforce, and proceed to the next option..
 - 16.1.4 If all of the above options are not feasible for the home, then as a last resort a atmospherically vented storage tank water heater with an open draft hood may be utilized.
 - 16.2 The NREL Standard Work Specifications require that Energy Star rated water heaters are selected when replacing water heaters. Currently Energy Star required efficiency ratings are not attainable with atmospherically vented technologies. When water heaters are installed, atmospherically vented units should only be considered as a last resort.



- 16.3 Existing policy language requiring “mobile home approved” equipment can allow for other equipment as long as it is acceptable for the housing type and installation location/configuration.
- 16.4 When fuel switching occurs with water heater replacement, no waiver is required prior to installation of the water heater.
- 16.5 For propane homes being fully converted to electric for beneficial electrification (i.e. there will be no propane appliances left in the home), a standard electric water heater may be installed if a HPWH cannot feasibly be installed.
- 17. **Cooking Appliances**
 - 17.1 Gas ovens will be tested for CO.
 - 17.1.1 A clean and tune will be conducted if measured CO, in the undiluted flue gasses of the oven vent, at steady state, exceeds 225 ppm or 800 ppm by air-free measurement.
 - 17.2 Gas range burners may be tested.
 - 17.2.1 If the flame has any discoloration, flame impingement, or an irregular pattern or if burners are visibly dirty, corroded, or bent, a clean and tune will be performed.
- 18. **Electrical Procedures**
 - 18.1 Live knob and tube wiring may be isolated to allow for insulation in the immediate area.
 - 18.2 A dam will be constructed to separate insulation from the wiring.
 - 18.2.1 This dam will not cover the top of any wiring.
 - 18.2.2 A six inch air gap between the dam and wiring must be maintained.
 - 18.2.3 A warning sign about the presence of knob and tube wiring must be installed at all entries to the attic.
 - 18.3 Knob and tube wiring may be replaced as an IRM.
 - 18.3.1 This IRM must be associated with an ECM, provided the ECM SIR is 1.0 or greater and cumulative SIR is 1.0 or greater.
 - 18.4 Wiring splices must be enclosed in metal or plastic electrical boxes and fitted with cover plates before being covered with insulation.
- 19. **General Moisture Requirements**
 - 19.1 Subgrantees must visually inspect for mold during the initial energy audit.
 - 19.2 The use of moisture meters as a diagnostic tool is recommended pre and prior to final inspection.



- 19.2.1 The results must be documented in the client file by completing the CEO WAP Mold Inspection and Release Form. See CEO-WAP-802 A1.
 - 19.3 Mold testing, abatement, remediation, or the removal of mold may not be done with typically allocated CEO WAP funds.
 - 19.4 Where severe mold and moisture issues cannot be addressed with Weatherization Readiness Funds, a deferral may be required. See CEO-WAP- 201 & 403.
 - 19.5 Homes with moisture sources in the home will be identified and removed or reduced.
 - 19.5.1 Local ventilation may be installed where appropriate (e.g., baths, kitchens) and vented directly outside.
 - 19.5.2 Existing mechanical ventilation must be vented outside the building if there are any signs of moisture problems associated with the ventilation.
 - 19.6 Moisture sources in the house that can generate moisture into the attic will be identified and removed or reduced.
 - 19.7 If there is suspected mold growth in the HVAC system, the system should not be operated and HVAC work should be limited to checking for visual indicators of carbon monoxide and spillage
 - 19.8 Gutters and downspouts may be installed to correct moisture-related issues that would prevent effective installation of weatherization measures.
 - 19.8.1 If downspouts are installed they must drain a minimum of six feet away from the house.
 - 19.9 Sump pumps may be installed on a case-by-case basis.
- 20. ASHRAE**
- 20.1 All DOE units must have an ASHRAE 62.2.2016 assessment performed and the proof of assessment must be included in the client file.
 - 20.1.1 If assessment calls for additional mechanical ventilation the unit shall be provided with ventilation in accordance with ASHRAE 62.2.2016.
 - 20.2 If the air infiltration rate of a non-DOE unit is less than 3 ACH@ 50, the unit shall be provided with ventilation in accordance with ASHRAE 62.2.2016.
- 21. Crawlspace Moisture Requirements**
- 21.1 For closed crawl spaces, a vapor barrier must be installed on the foundation wall.



- 21.1.1 Vapor barriers will be attached with a durable connection and the barrier will be sealed at punctures and all 12 inch overlapped seams to prevent air entry.
- 21.1.2 Field Guide requirements for closed crawl spaces must be followed. A durable connection is a mechanical attachment of vapor barrier material to the wall.
- 21.1.3 Common strategies for mechanical attachment include powder-driven nails, pins, or masonry screws that hold the vapor retarder up behind a furring strip or wall insulation.
- 21.1.4 Vapor barriers will not be attached to framing (i.e. the sill plate or floor joist) but must be attached to the foundation.
- 21.2 Exposed earth in/open) crawl spaces will be covered with a continuous, durable, Class 1 vapor retarder with a minimum thickness of six millimeters.
- 21.3 When space constraints exist that prevent a complete vapor barrier installation on a crawlspace, it is acceptable to submit a technical waiver and to install a vapor barrier in all areas that are feasible if the waiver is approved.
- 22. **Asbestos**
 - 22.1 When suspected asbestos-containing material is present, an asbestos worker safety policy must be enforced.
 - 22.2 All suspect asbestos containing material (SACM) that will be affected by the weatherization work must be assessed.
 - 22.3 **Client Education**
 - 22.3.1 Prior to taking samples and testing, the client and homeowner must be presented with the Colorado Department Public Health and Environment (CDPHE) client education pamphlet on asbestos, testing procedure, potential outcomes, and disclosure requirements.
 - 22.4 **Sampling and Testing**
 - 22.4.1 Samples for interior and exterior wall finish, where drill and blow work might be completed, should be taken where the holes will be drilled or siding removed for insulation installation.
 - 22.4.2 Sampling of SACMs is only permitted by a certified CDPHE Asbestos Building Inspector Testing of sample(s) is only permitted by a certified testing laboratory and testing must include a point count analysis.



- 22.4.2.1 If the test results prove the suspected asbestos material at 1% or less containing asbestos, the material is considered to be negative for containing asbestos and work may proceed.
- 22.4.2.2 Sidewall surfacing material and or wall board or similar materials that have been sampled, tested, and contain one percent (1%) or greater asbestos, or is PACM, must follow Class I - IV requirements per OSHA 29 CFR 1926.1101 for removal up to 25 linear feet for thermal system insulation (TSI) or surfacing material and or 10 square feet of material wall board and or similar material.
- 22.4.3 Testing must be approved by the client and/or homeowner
 - 22.4.3.1 If testing is done, the homeowner and client must be notified of the results in writing.
 - 22.4.3.2 If the homeowner does not allow for testing, consider alternative methods for installation (ex. blow sidewall insulation from the exterior, attic, or from underneath), or the individual measures may be deferred, or the entire unit may be deferred. See CEO-WAP-403.

22.5 Allowable Work

- 22.5.1 The disturbance amount allowed for holes drilled is the circumference and kerf of the holesaw or the entire hole size if you are using something other than a holesaw. The debris associated with the work is considered household waste and must be disposed of properly. Areas where drilling will occur should be spritzed with water prior to drilling.
- 22.5.2 Working wet is the preferred method whenever feasible.

22.6 Friable Asbestos

- 22.6.1 Blower door testing is not allowed in the presence of friable asbestos, be it pressurization or depressurization.
- 22.6.2 If friable asbestos materials can be encapsulated prior to blower door testing, then blower door testing is allowed.
 - 22.6.2.1 **Encapsulation:** Encapsulation is allowed by a qualified asbestos professional.
 - 22.6.2.2 **Drill and Blow:** Work for sidewall insulation should be done from the exterior whenever feasible.
- 22.6.3 All safety protocols must be completed as required for the Renovation, Repair, and Painting Rule (RRP Rule) including client education, signage, PPE, isolation of work areas, tenting, HEPA



22.7 Transite Siding

- 22.7.1 Removal of transite siding is allowed to perform conservation measures.
- 22.7.2 All precautions must be taken not to damage the siding of the home. Asbestos siding (transite siding) should never be cut or drilled.
 - 22.7.2.1 It is recommended, where possible, to insulate through the home interior.

22.8 Vermiculite

- 22.8.1 When vermiculite is present, blower door tests are not allowed through pressurization or depressurization, unless testing results prove negative for asbestos containing materials.
- 22.8.2 Samples must be taken as required (e.g. three samples per 1,000 square feet), and must include material from the top, middle, and bottom of the vermiculite.
- 22.8.3 Samples taken are to be combined into one sample for testing.
- 22.8.4 Testing must include a point count analysis.
 - 22.8.4.1 If less than one percent is considered as non-asbestos containing, weatherization services/measures are to be installed per the Recommended Measures Report where vermiculite is present.
 - 22.8.4.2 If the test results are positive at greater than one percent, the areas where the vermiculite is located must be deferred or the entire unit may be deferred.
- 22.8.5 The unit must be deferred if ASHRAE 62.2 or other health and safety measures cannot be completely and properly installed due to the presence of vermiculite insulation containing asbestos.
- 22.8.6 Written documentation must serve as proof that the vermiculite insulation was removed by a certified asbestos abatement contractor, and any air monitoring, and/or clearance testing as required by the CDPHE was completed and included in the client file.
- 22.8.7 If the vermiculite tested is positive for ACM, the vermiculite may be removed by a certified asbestos abatement contractor.
- 22.8.8 Removal of vermiculite may be possible with WRF. See CEO WAP 403.



23. Radon

- 23.1 In homes where radon may be present, precautions should be taken to reduce the likelihood of making radon issues worse and the client will be provided the EPA citizen's guide to radon. See WPN 22-7.
- 23.2 All site-built homes must have a "Radon Informed Consent Form" signed and stored in the client file.
- 23.3 Testing for radon is not allowable on any home weatherized through CEO WAP unless a subgrantee waiver is obtained.
- 23.4 Subgrantees are required to cover any exposed dirt in basements or crawl spaces with a minimum six-milometer polyethylene plastic vapor barrier.
 - 23.4.1 Field Guide procedures must be followed based on crawl space or basement type.
 - 23.4.2 Mobile homes are exempt from this requirement.
- 23.5 Subgrantees are required to air-seal the floor where possible and as much as feasible to prevent the infiltration of possible radon into the living space from the subspace area.

24. Lead Regulations

- 24.1 Presence of lead-based paint in homes built prior to January 1, 1978 will be assumed unless testing confirms otherwise.
- 24.2 EPA's RRP Program Rule (40 CFR Part 745) in pre-1978 homes and proposed changes to this rule (Federal Register/Vol. 75, No. 87/May 6, 2010) will be complied with, to be superseded by any subsequent final rulemaking or any more stringent state or federal standards.
 - 24.2.1 The presence of lead-based paint and varnish in homes built before January 1, 1978 will be assumed unless testing confirms otherwise.

25. Lead Requirements

- 25.1 Subgrantees are required to comply with both EPA and DOE requirements regarding lead based paint. See Appendix A of 10CFR440.
 - 25.1.1 Subgrantees must register as a "Firm" with the EPA.
 - 25.1.2 Subgrantees must assign a Certified Renovator to each job requiring Lead Safe Work, and a copy of their current certification certificate must be left onsite until completion of the work.
- 25.2 **Recordkeeping and Reporting**
 - 25.2.1 Firms must retain all records necessary to demonstrate compliance for a period of six years following completion of the weatherization and renovation.
 - 25.2.2 Records that must be retained include (where applicable):



- 26.1.1.1 Reports certifying that a determination had been made by an inspector that lead-based paint is not present on the components.
- 26.1.1.2 Signed and dated acknowledgments of receipt.
- 26.1.1.3 Certifications of attempted delivery.
- 26.1.1.4 Certificates of mailing.
- 26.1.1.5 Notification activities performed regarding common areas.

26. Pests

- 26.2 Pest removal is allowed only where infestation would prevent weatherization.
- 26.3 Infestation of pests may be cause for deferral where it cannot be reasonably removed or poses a health and safety concern for workers.
 - 26.3.1 The subgrantee may spend up to \$500 for pest mitigation.
 - 26.3.2 Any amount over that must be completed with WRF if available and without the removal the job would be deferred.
 - 26.3.3 Screening of windows and points of access is allowed to prevent intrusion or after mitigation has taken place.
 - 26.3.3.1 Some examples of barriers are window screens, copper mesh stuffed into holes and cracks, and mortar and metal flashing. See WPN 22-7.
 - 26.3.4 Canned pesticide foggers are not permitted to be used as a mitigation method
- 26.4 For information on dealing with bed bugs, both from a worker and client perspective. See 10 CFR 440 Appendix A.

27. Biological and Unsanitary Conditions

- 27.1 Types of health and safety hazards that may be included under this category include, but are not limited to: Odors, mustiness, bacteria, viruses, raw sewage, rotting wood, garbage, etc.
- 27.2 This health and safety category shall require sensory inspection for the purpose of detection.
- 27.3 All areas should assume termite pressure exists and follow Field Guide procedures for termite inspection protocols.
- 27.4 The use of personal protective equipment shall be strictly enforced.
 - 27.4.1 Respirators, protective eyewear, and protective clothing must be worn when there is suspicion or knowledge that biological agents may be present in order to eliminate or minimize crew exposure.
- 27.5 Remediation of conditions that may lead to or promote biological concerns and unsanitary conditions is allowed.

- 28. WRF may be available should these conditions cause the deferral of a home.



COLORADO

Energy Office

Weatherization Assistance Program



CEO-WAP-803

Building Shell Air Sealing

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [100 A0](#), [100 A1](#)

1. Abstract

1.1 This policy serves as guidance from Colorado Energy Office (CEO) Weatherization Assistance Program (WAP) to subgrantee field teams and subcontractors on the requirements for air sealing throughout the building shell of a unit or multi unit building.

1.2 The Colorado Field Guide will be followed at all times.

2. General Air Sealing/ Attics Penetrations and Chases

2.1 Air sealing will be done at the thermal boundary to achieve a continuous air barrier that prevents air leakage and moisture movement between the outside and conditioned space.

2.2 Air sealing will be evaluated in NEAT/MHEA and will require an SIR of 1.0 or above to complete.

2.2.1 This must be evaluated unless it is considered a health and safety measure.

2.3 Balloon framing and open wall cavities will be air sealed.

2.4 Non-Insulation Contact (IC) Recessed Lights that will be air sealed must follow clearance and material specifications outlined in the Field Guide.

2.5 Only non-combustible sealant will be used in contact with chimneys, vents, and flues.

2.5.1 Local codes will be referenced.

2.6 All access hatches between unconditioned spaces and interior of home or will be sealed or weather-stripped to prevent air leakage, if cost effective.

2.7 Penetrations and chases will be sealed to prevent air leakage and moisture movement between the attic and conditioned space.

2.7.1 Chases will be capped with rigid material and sealed using appropriate material. Chases that are greater than 24 inches must have backing installed or material is rated to span area without sagging.



3. Open Stairwells

3.1 Stairwells will be air sealed at the thermal boundary to achieve a continuous air barrier that prevents air leakage and moisture movement between the attic and conditioned space.

4. Dropped Ceilings and Soffits

4.1 Appropriate and cost effective repair procedures must be made with the desired outcome of aligning the thermal boundary and air barrier.

4.2 Airtight, durable seals that do not move, bend, or sag must be completed.

4.3 Open cavities above closets and tubs will be sealed following.

4.4 Dropped ceiling/soffit light boxes and fixtures will be sealed.

4.5 Air sealing must be verified using one or a combination of the following tests: smoke, zone pressure diagnostics, or pressure pan testing at 50 pascals of pressure difference.

5. Windows and Doors

5.1 Measures related to windows and doors must be cost effective unless otherwise noted.

5.1.1 Any permitted replacements must have the conditions of the original door or window recorded in the client file.

5.2 Replacement

5.2.1 The replacement, repair, or installation of windows and doors is not a permitted health and safety cost unless non-DOE funds are used.

5.2.2 Any door or window that is deteriorated or damaged beyond repair that is a health and safety concern may be replaced as a health and safety measure with non-DOE funding.

5.3 Egress windows and doors must not be made to prevent entry or exit in the case of an emergency.

5.3.1 This requirement supersedes all other requirements.

5.4 Window and door replacement must follow lead based paint procedures and requirements for homes built before 1979.

5.5 Subgrantees must consider installing operable storm windows, or repairing installed storm windows on the prime window sash, so that operable windows can be opened without removing the storm window.

5.6 The following replacements are allowable:

5.6.1 Single pane windows with double pane or more energy efficient windows

5.6.2 Doors may be replaced as an IRM

5.7 The addition of the following measures are allowable:

5.7.1 Storm windows to single pane windows



- 5.8 The following repairs are allowable:
 - 5.8.1 Doors, to ensure proper fit in the frame
 - 5.8.2 Exterior doors may be sealed to prevent air infiltration
6. **Basements and Crawl spaces**
 - 6.1 Crawl spaces and basements will be separated using an appropriate method which defines the spaces and allows for treatment in accordance with specifications.
 - 6.2 Air sealing will be evaluated in Weatherization Assistant and will require an SIR of 1.0 or above to complete.
 - 6.2.1 This must be evaluated unless it is considered a health and safety measure. See CEO-WAP-802.
 - 6.2.2 Before air sealing the basement or crawl space walls near wet areas, surface water pooling must be addressed
 - 6.3 The following will be sealed:
 - 6.3.1 Crawl spaces and basements will be separated using an appropriate method which defines the spaces and allows for treatment in accordance with specifications.
 - 6.3.2 Any perforations, holes, or separations which connect the living space with these areas will be sealed.
 - 6.3.3 Crawl space access hatches on the interior of a home, or exterior access for closed crawl spaces, will be sealed or weather-stripped to prevent air leakage per radon policy.
 - 6.4 Skirting may be installed to protect water lines which may be susceptible to freezing or exposed floors from damage due to natural causes such as wind, water, and pests.
 - 6.4.1 Skirting should be installed as an IRM associated with insulation or air sealing or an ECM.
 - 6.4.2 Any skirting installed in contact with ground must be pressure treated or rated for ground contact.
7. **Attached garages**
 - 7.1 Homes with doors between an attached garage and house must be air sealed to prevent indoor air quality issues.
 - 7.2 Air sealing to prevent air leakage between attached garages and the home is required, regardless of the air leakage rate of the home.
 - 7.2.1 Such air sealing shall include, but is not limited to, weather-stripping, sealing adjoining doors, removal of ducts in a garage, and sealing cracks between the mud sill, rim joists, subfloors, and bottom of a gypsum board.



- 7.3 CO alarms should be installed one per floor and near sleeping areas in homes with attached garages regardless of combustion fuel types in the home.
- 8. **Duct Systems**
 - 8.1 Existing ductwork in good condition:
 - 8.1.1 Will not be replaced if it has an insulation minimum of R-8.
 - 8.2 All ducts, supply and return, outside the thermal boundary must:
 - 8.2.1 Be assessed by WA as an ECM, unless it is to be completed as a health and safety measure.
 - 8.2.2 Be assessed to ensure proper support in order to eliminate falling and sagging of ducts.
 - 8.2.3 Have pre and post sealing leakage assessment completed by pressure pan measurement, whole house subtraction method, or duct blaster.
 - 8.2.4 Must be cleaned and/or vacuumed to remove any objects that may impede airflow.
 - 8.2.5 Platform returns will be cleaned, and sealed and exposed building material covered with fire rated material.
 - 8.2.6 Have all ducts and plenums properly fastened to prevent leakage.
 - 8.2.7 Have any large duct leaks sealed in areas inside the thermal boundary to outside the thermal boundary.
 - 8.2.8 Any disconnected ductwork must be reconnected and sealed or replaced based on its condition.
 - 8.2.9 All gaps between the boot and interior surface defining the conditioned space will be sealed.



CEO-WAP-804

Insulation

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [803](#)

1. Abstract

1.1 This policy explains the requirements from Colorado Energy Office (CEO) Weatherization Assistance Program (WAP) and the Department of Energy (DOE) on sufficiently and safely installing insulation as a part of weatherization assistance.

1.2 The policy is divided up by general requirements and requirements specific to different parts of the home, specifically those dividing the intentionally regulated area and the thermal boundaries of the unit or home.

2. General Requirements

2.1 The audit is the initial assessment of the home and interaction with the client. The field audit must include at least the following activities:

2.1.1 Subgrantees may install attic insulation to the highest R-value that is cost effective and feasible per the NEAT/MHEA analysis.

2.1.1.1 At no time in the process of this installation should the structural integrity be compromised.

2.1.2 A completed and signed Certificate of Insulation must be posted if insulation is installed.

2.1.2.1 The certificate must include: insulation type, coverage area, R-value, installed thickness, settled thickness, and number of bags installed. This certification must be installed for all insulation measures.

2.1.3 Insulation must be installed in such a manner that it ensures complete coverage at the thermal boundary and a consistent R-value, except where physical constraints may exist.

2.1.4 Installation must be within 10 percent of the estimate; lesser or greater percentages must be documented and must be reasonable or practicable.



- 2.1.5 Attic repairs must be completed in a manner that fully protects the added insulation material.
- 2.1.6 Batt insulation and expanding foam sealants must not be left exposed inside finished living spaces.
- 2.1.7 Finished grade materials must be used inside of finished spaces
- 2.1.8 Live knob and tube wiring will not be covered or surrounded as required by the National Electrical Code (NEC).
- 2.1.9 Live knob and tube may only be isolated in order to insulate the wiring; the dam may not cover the top of knob and tube and will be created to separate the insulation from the wiring.
 - 2.1.9.1 When this isolation is performed, a six inch air gap must be maintained between the dam and wiring. A warning sign must be installed at all entries to the attic about its presence.
- 2.1.10 An attic furnace must be shielded so that there is a 30 inch work platform adjacent to the controls or otherwise meets local code requirements.
- 2.1.11 When building components (attic, floor, belly, or walls) have sections with different R-values in the same component area, it is recommended to separate or group areas with similar R-values together to model in energy modeling software.
 - 2.1.11.1 When it is not practical or feasible due to software constraints (i.e. mobile home bellies, attics, or walls) a weighted average R-value may be used to determine an overall compendious R-value.
 - 2.1.11.2 When used by an auditor in determination of the weighted average, the Weighted Average R-value worksheet must be kept in the job file.



- 2.1.12 For existing batt insulation in attics and floors it is acceptable to use Building Performance Institute’s (BPI) effective R-value chart to determine an effective R-value based on installation quality.

Effective R-values for Batt Insulation*

Measured Batt Thickness (inches)	“Good”	“Fair”	“Poor”
	Effective R-value (2.5 per inch)	Effective R-value (1.8 per inch)	Effective R-value (0.7 per inch)
0	0	0	0
1	3	2	1
2	5	4	1.5
3	8	5	2
4	10	7	3
5	13	9	3.5
6	15	11	4
7	18	13	5
8	20	14	5.5
9	23	16	6
10	25	18	7
11	28	20	8
12	30	22	8.5

1. Measure the insulation thickness.
2. Determine the condition of the installation using the following criteria:
 - ✓ Good – No gaps or other imperfections
 - ✓ Fair – Gaps over 2.5% of the insulated area. (This equals 3/8 inch space along a 14.5 inch batt.)
 - ✓ Poor – Gaps over 5% of the insulated area. (This equals 1/2 inch space along a 14.5 inch batt.)
3. Look up the effective R-value of the installed insulation using the condition and measured inches.

**Derived from ASHRAE document: “Heat Transmission Coefficients for Walls, Roofs, Ceilings, and Floors” 1996*

3. Attic Insulation-General Preparation

- 3.1 Insulation will be adequately marked with its minimum depth of every 300 square feet of attic area, with measurement beginning at the air barrier.
- 3.2 All electrical boxes must be flagged to be seen above the level of the insulation.
- 3.3 All open electrical junction boxes will have covers installed.
- 3.4 All attic, non-rated heat sources shall be blocked with metal material to provide at least three inches, but no more than six inches of space between the heat source and insulation where feasible; the height must be two inches or greater than the insulation to be installed. Any insulation dams will be fixed in place to maintain clearances.
- 3.5 Where gas combustion and masonry vents pass through insulated assemblies, an insulation shield constructed of noncombustible material shall be installed to provide clearance between the vent and insulation material.
- 3.6 Rated heat sources may be blocked to their rated distance (i.e. B vents) require one inch of clearance to combustibles.
- 3.7 **Non-IC rated recessed lights**
 - 3.7.1 A fire-rated air barrier system, equivalent to 5/8 fire code gypsum wallboard, will be used to separate non-IC rated recessed lights from insulation, using one of the following methods:
 - 3.7.1.1 A fire-rated airtight closure taller than surrounding attic insulation will be placed over non-IC rated recessed lights.



3.7.1.2 The non-IC rated light fixture will be replaced with an airtight and IC- rated fixture.

3.7.1.3 The fixture(s) may be replaced with a surface mounted fixture and opening sealed.

3.8 Non-IC rated can light air tight enclosure

3.8.1 Enclosure top material will have an R-value of 0.5 or less and the top of the enclosure will be left free of insulation.

3.8.2 The entire closure will maintain a three inch clearance between the closure and the fixture including wiring, box, and ballast.

3.8.3 Caulk, mastic, or foam will be used on all edges, gaps, cracks, holes, and penetrations of closure material.

3.8.4 When baffles are installed at existing eaves or soffit areas, they shall be installed to allow free flow of air.

3.8.4.1 Examples of baffle material include previously formed attic vent baffles made of cardboard, or Styrofoam, rigid or batt insulation.

3.8.5 A minimum of a one inch space shall be provided between the insulation and the roof sheathing at the location of the vent.

3.8.6 When alterations are made to the existing venting, venting requirements shall conform with local code (i.e. meet the net free area of ventilation per square feet of attic space).

4. Attic Knee Walls

4.1 Existing batted insulation on knee walls may be adjusted to ensure it is in full contact with the interior cladding and the top and bottom plates.

4.2 Existing knee wall insulation may be strapped and or secured to ensure durable lasting installation.

4.3 New batts will be installed in accordance with the manufacturer's specifications.

4.3.1 For instance, paper faced batts will be installed with the paper facing the heated or conditioned side of the assembly.

4.4 Knee walls may be densely packed, net and blow, or rigid insulation installed if cost effective.

5. Attic Openings

5.1 Attic access hatches, knee wall access, and pull down stairs within the thermal boundary must be run as an ECM.

5.1.1 If this is not found to be cost effective, they will be run as an IRM associated with attic insulation measures.

5.2 Attic access hatches, knee wall access, and pull down stairs will be sealed or weather-stripped to prevent air leakage.



- 5.3 Any stair assembly will be insulated to the highest R-value structurally possible and allowable, and will be done so in congruence with the adjoining insulated assembly.
 - 5.3.1 Rigid insulation is preferred.
- 5.4 If attic insulation is installed, all attic access hatches and stairs will have insulation dams installed as well.
6. **Wall Insulation**
 - 6.1 Lead and asbestos safety procedures will be followed at all times.
 - 6.2 All walls will be properly prepared to receive dense pack insulation which includes provisions to prevent damage to the house, provide a clean work space, and thorough access to allow 100 percent coverage.
 - 6.2.1 Ensure proper equipment and process results in consistent density to prevent settling and retard air flow through cavities.
 - 6.3 Any and all cavities will be free of hazards, intact, and able to support dense pack pressures.
 - 6.4 Insulation will be installed to the manufacturer's recommended density.
 - 6.5 Proper length and use of a fill tube is required.
 - 6.6 Sidewalls must not have voids totaling more than five percent of the net wall area, excluding those areas that may receive a technical waiver such as areas around heat sources, unsafe electrical wiring, or other similar circumstances.
 - 6.7 Subgrantees must obtain a warranty from their subcontractors of at least one year against voids of more than five percent (as described above).
 - 6.8 Installation holes will be plugged and patched to keep weather out and will be done so to match the existing surface as closely as possible.
7. **Floors**
 - 7.1 When insulation is installed at the floor, the crawl space will be considered an open crawl space.
 - 7.2 Crawl space moisture problems must be addressed by source control prior to installing insulation.
 - 7.3 If floor insulation is to be installed it must be installed in contact with the subfloor without gaps, voids, compressions, misalignments, or wind intrusions. Insulation will be installed to prescribed R-value and be secured with physical fasteners.
 - 7.4 Floors may be insulated using net and fill or with rigid insulation if cost effective and appropriate.



8. Basements and Crawl spaces

- 8.1 Crawl space access hatches on the interior of the home, or exterior access for closed crawl spaces, will be sealed or weather-stripped to prevent air leakage. See CEO-WAP-803.
- 8.2 Access hatches to unconditioned spaces will be insulated to the maximum R-value structurally allowable up to the R-value of the adjoining insulated assembly. Rigid insulation will be used if feasible.
- 8.3 When crawl space perimeter insulation is installed it will be considered a closed crawl space and all pertinent WAP Field Guide technical standards must be followed including vapor barrier installation, rim joist sealing, rim joist insulation, termite inspection gap, vent/air sealing, and moisture precautions.
- 8.4 Closed crawl spaces and basement insulation will not be considered, nor repaired, if there are existing or potential moisture problems.
- 8.5 Perimeter insulation must be installed in complete contact with the foundation wall and have all appropriate physical attachments.
- 8.6 Basement walls will be insulated to IECC minimum R-Value requirements, or what is cost effective based on NEAT/MHEA.

9. Duct Insulation

- 9.1 Uninsulated ducts outside the thermal boundary are required to be assessed for duct insulation.
 - 9.1.1 A minimum of R-8 duct insulation must be installed, if cost effective.
 - 9.1.2 Ducts may be buried with attic insulation installation provided that it is a minimum of R-8.
 - 9.1.3 Supply cooling ducts will have a vapor retarder attached on the exterior side of duct insulation and in accordance with local code.
- 9.2 When a closed crawl space application is installed with perimeter insulation, duct insulation is not required.
 - 9.2.1
- 9.3 A newly installed flex duct must have a minimum R-8 insulation.
- 9.4 Existing flex ducting does not have to be replaced if in good condition.
- 9.5 Any newly installed flex ducts or metal duct insulation must be installed according to field guide attachment requirements.
- 9.6 Any newly installed flex duct must be strapped and supported whilst existing duct work will be assessed to ensure proper support that eliminates falling and sagging.
- 9.7 Duct work outside the thermal boundary must be sealed prior to duct insulation.



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CEO-WAP-805

HVAC

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [801](#); [29 CFR 1910 & 1926](#); [OSHA](#); ANSI Z21.11.2

1. Abstract

1.1 This policy serves as an outline from Colorado Energy Office (CEO) Weatherization Assistance Program (WAP) on working safely and properly with heating, ventilation, and air conditioning systems (HVAC). This policy will cover replacements of thermostats, working with, repairing, testing, and installation of combustion appliances.

2. General Requirements

2.1 Furnace technicians must know the required procedure and application of the following diagnostic procedures and tests:

- 2.1.1 Spillage and draft pressure measurement
- 2.1.2 Clocking the meter
- 2.1.3 Heat rise
- 2.1.4 Static Pressure test
- 2.1.5 Pilot safety
- 2.1.6 Steady State Efficiency
- 2.1.7 Duct system sizing (Manual D)
- 2.1.8 Heating system sizing (Manual J)

2.2 For general HVAC safety requirements see CEO-WAP-802.

3. Combustion Safety Requirements

3.1 Combustion appliances must operate in a safe and reasonably efficient manner.

3.2 Flex connectors that are constructed of brass, damaged, or were manufactured before 1973 must be replaced.

3.2.1 Copper supply lines for natural gas must be replaced (health and safety) with Gastite™ or black pipe.

3.3 Any home using a CAZ for a sleeping room shall not be weatherized and will be deferred until such situation is remedied by either:



- 3.3.1 Client education on the dangers of carbon monoxide resulting in the client permanently removing the bedroom furniture from the area.
- 3.3.2 Documentation from before and after, both digital and written, must be placed in the client file.
- 3.3.3 Isolation of the sleeping area from the CAZ is built with a solid wall and door, complete with weather stripping, in order to mitigate the possibility of CO entering the sleeping area.
 - 3.3.3.1 Proper combustion air must be supplied to the CAZ if this is the avenue taken.
 - 3.3.3.2 The cost of this extra work can utilize health and safety dollars or can be run as an incidental repair.
- 3.4 Ensure the venting system is installed properly.
- 3.5 Baseline pressure will be measured in CAZ with reference to outdoors.
- 3.6 Depressurization tests performed will include exhaust fans, interior door closure, or duct leakage, or a combination thereof, to account for base pressure.
- 3.7 Furnaces with defective manual pilot assemblies are to be replaced as an IRM associated with furnace tune-up.
 - 3.7.1 If a furnace tune-up is not cost effective and the pilot assembly leaks gas which creates an unsafe situation and compromises the health and safety of the occupants or crews, the pilot assembly may be replaced under health and safety repairs.
- 4. **Forced Air Furnace Replacement**
 - 4.1 Heating systems should be evaluated for cost effective replacement first, and if the heating systems qualify for both ECM and health and safety replacement, then the measure should be treated as an ECM.
 - 4.2 Heating system installation as a health and safety measure is allowable if system does not have an SIR of 1.0 or greater and there is a condition that could potentially affect the health and safety of the occupants or crew (i.e. a cracked heat exchangers and excessive CO that cannot be remediated).
 - 4.3 Furnaces with cracks in the heat exchanger must be replaced.
 - 4.4 If furnace repair costs exceed 25 percent of the cost of replacing the furnace, the furnace may be replaced rather than repaired.
 - 4.5 Forced air gas furnaces that will be replaced must meet the following criteria:
 - 4.5.1 Priority shall be given to clients with high space heating costs.



4.5.2

The efficiency of the existing furnace must be determined and documented in the client file.

4.6 AFUE must be determined by one of the three following methods:

4.6.1 Information obtained from the manufacturer's name plate.

4.6.2 Information located in an authoritative source, such as "Preston's Guide".

4.6.3 Performing a Steady State Efficiency (SSE) test and using the results in NEAT is allowed. The default SSE (Output / Input) may also be used.

4.6.3.1 This calculation is performed automatically if the SSE input box is left blank and the user presses the TAB key to advance past the box.

4.7 Any forced air furnace that will be replaced must be sized appropriately as required by the local building authority.

4.8 Subgrantees must replace furnaces, both for safety and efficiency, with a furnace with the highest efficiency that is cost-effective and feasible.

4.9 Open-combustion mobile home furnaces must be replaced unless the mobile home manufacturer's design was intended for that type of installation (i.e. an interior closet that has an open combustion furnace and water heater that is sealed from the living space).

4.10 Existing forced air furnaces will be removed when feasible and the obsolete furnace will be properly recycled or disposed of.

4.11 In the event that the furnace is replaced with WAP funding, a return air filter access point must be installed in an accessible location, if feasible. The cost of relocating the furnace filter point should be run as an IRM associated with furnace replacement.

5. Warranty

5.1 Subgrantees must provide at least a one year warranty on a new furnace.

5.2 New furnaces for site-built homes must carry a five year warranty on parts and a fifteen year warranty on the heat exchanger.

5.3 New furnaces for mobile homes must carry at least a two year warranty on parts and a ten year warranty on the heat exchanger.

5.4 The furnace repair history for new furnace installations must be considered when purchasing furnaces and preference must be given toward purchasing furnaces with the lowest repair history rate.

5.4.1 Furnaces with repair rate histories that are greater than 18 percent may not be installed.



6. Hydronic Heating Systems

6.1 The following conditions will be assessed by a licensed contractor:

- 6.1.1 Water, steam, and fuel leaks
- 6.1.2 Damaged or missing pipe insulation
- 6.1.3 Venting issues as a result of draft or condensation (e.g., soot, rusting of flue pipe, burned paint or wires, efflorescence)
- 6.1.4 Corrosion (e.g., rust, mineral deposits)
- 6.1.5 The general condition of all system components
- 6.1.6 Prescriptive boiler performance modifications, or tune-ups, are not permitted.
 - 6.1.6.1 However, problems that may interfere with flame (e.g., dust, debris, misalignment) will be cleaned, vacuumed, and adjusted if the appliance is not being replaced.
- 6.1.7 Combustion safety testing must be completed on hydronic heating systems.
- 6.1.8 Hydronic pipe insulation must be installed outside the living space but may be installed inside the living space if the area is overheated.
 - 6.1.8.1 Pipe insulation materials will be approved for appropriate systems
 - 6.1.8.1.1. (e.g. steam heating pipes or hot water heating pipes).
 - 6.1.8.2 Insulation will be installed to achieve complete coverage with no voids, gaps, or holes.



CEO-WAP-806 Ventilation

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

[ASHRAE 62.2.2016](#)

1. Abstract

1.1 This policy from the Colorado Energy Office (CEO) Weatherization Assistance Program (WAP) covers installing ventilation systems and ducts and with which tools and materials a technician should use in order to do so.

2. Ventilation Assessment Requirements

2.1 All units funded with DOE monies must have an ASHRAE 62.2.2016 assessment performed and the proof of assessment must be included in the client file. If assessment requires additional ventilation, all applicable ASHRAE requirements must be met.

2.2 A client's refusal of mechanical ventilation, when evaluated and called for pursuant to the ASHRAE Standard 62.2.2016, must result in deferral of the unit.

2.3 If the air infiltration rate of a non-DOE unit is less than 3 ACH@ 50, the unit shall be provided with ventilation in accordance with ASHRAE 62.2.2016.

2.4 When a non-DOE unit has 3 ACH@50 or greater, ASHRAE 62.2.2016 may be implemented if it is deemed to have an existing indoor air quality issue.

3. ASHRAE 62.2.2016 Calculation

3.1 The Residential Energy Dynamics online calculator (RED Calculator) must be used or other approved calculator to document ventilation requirements as prescribed by ASHRAE 62.2.2016.

3.2 The RED Calculator must be included in the client file when ASHRAE is implemented.

3.3 Square footage, used for the ventilation calculation, includes any floor space within the thermal boundary, including conditioned crawl spaces.

3.4 The formula method must be used in calculating ventilation needs.

3.5 The closest geographical N-value must be used in ventilation calculations. Subgrantees need to determine how each of these N-values will be used in their territories.



- 3.6 Units with a final ventilation requirement of 15 CFM or less will not require additional ventilation.
4. **Installation**
 - 4.1 All newly-installed systems with mechanical venting ducts installed outside the thermal boundary are required to use R-8 insulation and must be vented outside of the building shell.
 - 4.2 Insulation should be installed on existing mechanical venting ducts if the condition of the attic will be changed with the weatherization work (i.e. adding insulation to an attic with zero insulation).
 - 4.3 Existing mechanical ventilation must also be re-vented outside the building if there are any signs of moisture problems associated with the ventilation.
 - 4.3.1 All support materials must be applied in a way that does not crimp, impede, or cause the interior dimensions of the ductwork to be less than specified.
 - 4.4 Units with a final ventilation requirement of 15 CFM or less do not require additional ventilation.
 - 4.5 Exhaust vent locations may not be located within three feet of openings, such as doors and windows and must be a minimum of 10 feet away from mechanical intake.
 - 4.6 Exhaust systems should have appropriate termination kits installed, be sealed to prevent air and water leakage, and be outfitted with a backdraft damper.
 - 4.7 Pressure effects caused by exhaust fans will be assessed and corrected when found outside of combustion safety standards.
 - 4.8 Make-up air will be provided in the event that negative pressure affects venting of combustion appliances.
 - 4.9 Kitchen range hoods should follow appropriate ducting procedures with ducts leading to outside the thermal boundary.
5. **Inspection**
 - 5.1 Fan flow rates must be tested post weatherization to determine if the required ventilation is achieved.
 - 5.2 For final inspection requirements see CEO-WAP-902.
6. **Client Education**
 - 6.1 When ASHRAE 62.2.2016 is implemented, a client education form must also be completed.
 - 6.2 For more ASHRAE requirements, see ASHRAE 62.2.2016.
7. **Dryer Venting/Ducts**
 - 6.1 Dryer ducts must terminate outside of the building shell whenever feasible.



- 6.2 Dryer vents outside of the thermal boundary must be insulated to a minimum of R-8.
 - 6.3 Duct material must be metal and have a smooth interior finish (rigid duct). Flex ducting is only permitted where physical constraints prohibit the use of rigid duct material.
 - 6.4 Dryer ducts exceeding 35 feet in duct equivalent length will have a dryer booster fan installed.
 - 6.5 All ducts must be supported every eight feet or fewer by metal or plastic strapping with no hardware penetrating the vent pipe (i.e. screws, nails, etc). The male end of the duct at overlapped duct joints shall extend in the direction of airflow.
 - 6.6 Joints must be sealed with silver metal tape.
8. **Supply Systems**
- 8.1 Supply ventilations systems may be installed.
 - 8.2 Supply systems air intake will be installed in accordance with the following measurements:
 - 8.2.1 A minimum of six inches from grade
 - 8.2.2 A minimum of 10 feet from contaminant sources or exhaust outlets
 - 8.2.3 Above local snow or flood line.
 - 8.2.4 A minimum of 18 inches above an asphalt-based roof.
 - 8.2.5 Never on a flat roof.
9. **Whole Building Ventilation**
- 9.1 Whole building ventilation may be installed based on ASHRAE 62.2.2016 requirements.



CEO-WAP-807

Baseload Measures

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [403](#), [701](#), [801](#), [901](#), [703 A1](#), [801 A1](#), [807 A1](#);
AHAM database; Kouba-Cavallo database

1. Abstract

1.1 This policy serves as an introduction to standard and baseload measures for the Colorado Energy Office (CEO) Weatherization Assistance Program (WAP).

2. Weatherization Measures

- 2.1 Subgrantees must install all measures that meet cost-effective guidelines, if feasible.
- 2.2 If compliance with local codes results in a measure becoming not cost-effective, contact CEO WAP staff for guidance. See CEO WAP 801.
- 2.3 Procedures documented in the Colorado Field Guide (CFG) provide direction for testing, diagnostics, and the installation of Energy Conservation Measures (ECM) and repairs.
 - 2.3.1 Procedures must be followed as closely as possible.
 - 2.3.2 Subgrantees may submit new procedures for testing and implementation and CEO WAP staff will consider adoption of the suggested procedure based on its effectiveness, efficiency, and quality of results.

3. Refrigerator Replacement Requirements

- 3.1 Owners of refrigerators older than five years must approve the replacement of the refrigerator, if it is cost-effective to do so.
 - 3.1.1 If the owner approves, refrigerators must be evaluated for replacement. See CEO-WAP-807 A1.
- 3.2 Only operating refrigerators and refrigerator-freezers may be replaced.
 - 3.2.1 All individual refrigerators must be replaced with a new refrigerator that meets the cost-effective criteria (SIR) of 1.0 or greater, if feasible, and if the owner gives permission to do so.
- 3.3 A maximum of one refrigerator may be installed per weatherized unit.



- 3.4 Refrigerators that are less than five years old do not have to be considered for replacement.
- 3.5 Subgrantees may consider the replacement of two refrigerators with one new, efficient refrigerator that meets an SIR of 1.0 or greater only when the energy load of both appliances being replaced are factored into the SIR analysis.
- 3.6 Eligible refrigerators that are not metered must be analyzed with the NEAT computer audit, or other approved methodology.
- 3.7 At least 10 percent of replacement refrigerators must be metered.
- 3.8 All eligible refrigerators whose manufacturer information cannot be determined must be metered.
- 3.9 Eligible refrigerators are those functioning appliances that meet the SIR criteria for replacement, and can reasonably be accessed for removal and replacement. If a non-standard size is required, the subgrantee must research the most cost-effective and energy-saving replacement possible.
- 3.10 The owner of eligible refrigerators must sign the CEO WAP Refrigerator Replacement agreement, and must comply with the terms of that agreement, including relinquishing ownership of the old appliance at the time of delivery of the new appliance. See CEO-WAP-403 & Appendix 801 A1.
- 3.11 Subgrantees must retain in the client file CEO WAP Terms and Conditions for Refrigerator Replacement form.
- 3.12 In the client file subgrantees must retain pertinent information from the existing refrigerator, detailing the make, model number, size, age, kilowatt hour usage, and if it was metered or found in the AHAM database.
- 3.13 Handicap-accessible appliances (i.e., side by side, bottom freezer) are allowed with the following requirements:
 - SIR on a typical replacement model must be 1.0 or greater
 - Client files must include documentation of a handicap-accessible appliance, as applicable.
 - The replacement appliance must be energy efficient.
- 3.14 Ice makers may be ordered with the new appliance provided the existing appliance has a water line for the ice maker and the client demands it as a condition for approving the replacement. The additional cost is to be included in the cost-effective analysis.
- 3.15 Subgrantees have the option to replace refrigerators when they are cost effective.



- All replacement refrigerators must be energy efficient
 - All replacement refrigerators must be as close to the original size as possible
 - All replacement refrigerators must meet a SIR of 1.0 or greater
 - If they are rebateable, the rebate amount may be used to model the refrigerator in the energy audit to assure cost effectiveness.
- 3.16 Replacement refrigerators must be able to plug into a grounded outlet without the use of an extension cord.
 - 3.16.1 Cost to install a grounded outlet is to be included as an incidental repair.
- 3.17 A larger size refrigerator may be considered if the client makes the request and it is still cost effective.
- 3.18 Appliances will be installed in accordance with manufacturer specifications and local codes.
 - 3.18.1 Any penetrations to the exterior of the home created by the installation of the appliance will be sealed.
 - 3.18.2 Warranty information, operation manuals, and installer contact information will be provided to the occupant.
- 3.19 The minimum time duration of metering is a two-hour period, uninterrupted by a defrost cycle. If the defrost timer cannot be advanced, a meter capable of detecting the defroster run time must be used to meter for a minimum of three hours.
- 3.20 Use the highest number either from metering or from an approved database.
- 3.21 Rebates may be available for the installation of new refrigerators based on the client's utility provider and their contracted criteria with CEO WAP. See CEO-WAP-703 A1.
- 3.22 The results of the aforementioned evaluations and replacement of all refrigerators must be documented in the client file.
- 4. **Client refrigerator replacement requirements**
 - 4.1 An adult must be present at the time of delivery to sign for receipt of the new refrigerator.
 - 4.1.1 CEO WAP defines an adult as an individual who is 18 years or older.
 - 4.2 The client must empty the old refrigerator of all food and create a clear path for removal and delivery of the respective appliances.



- 4.3 The client is responsible for the cooling of any food during the first 24 hours, the unit's stabilization period, after delivery of the new refrigerator.
- 4.4 Delivery must be physically verified by a subgrantee employee; no phone calls to clients or delivery documentation can be used for verification of delivery.
5. **Domestic Water Heating**
 - 5.1 Domestic water pipes which are likely to freeze must be insulated. This cost must be included in NEAT/MHEA as health and safety repair or as an incidental repair connected to a measure (floor system, attic insulation, etc.)
 - 5.2 All domestic hot water temperatures must be measured.
 - 5.2.1 Clients should be informed about the potential for scalding if the water temperature is above 130° fahrenheit (F).
 - 5.2.2 An auditor or technician may adjust the water temperature down to 125° F from a higher temperature, with the client's approval.
 - 5.3 The client should be shown how to set the water temperature if they want a lower temperature setting; the technician should set the temperature to that which feels most comfortable for the client.
 - 5.4 Temperature relief valves may be installed on existing units for health and safety reasons.
 - 5.5 When installing a new water heater, a pressure and temperature relief valve and a safety discharge pipe must be included which shall not terminate more than six inches above the floor or waste receptacle.
 - 5.6 Water heaters may be converted from electric to gas fired on a case-by-case basis, with prior DOE approval.
 - 5.6.1 Priority for replacement of electric water heaters should be with an ASHP if it is effective.
 - 5.6.2 If the water heater is replaced, heat trap check valves must be included. NEAT/MHEA must be used to evaluate the cost effectiveness of water heater conversions.
6. **Water Heating Insulation Blankets**
 - 6.1 Hot water leaks must be repaired when found.
 - 6.2 Water heaters must be assessed for additional tank insulation regardless of location and installed if cost effective.
 - 6.2.1 They must be insulated to a minimum of R-11.
 - 6.3 When installing an insulation blanket, do not cover draft diverters, pressure relief valve and discharge pipe, thermostats, manufacturers warning labels, high-limit switches, access plates, or side combustion air vents if the water heater is so equipped.



- 6.4 It is not necessary to insulate over the combustion chamber below the water vessel
- 6.5 When installing a new water heater you must include a pressure and temperature relief valve and a safety discharge pipe. See CEO-WAP-701.
- 7. **Water Pipe Insulation**
 - 7.1 If cost effective, the first six feet of both hot and cold water pipes should be insulated.
 - 7.1.1 The cost of replacement of water pipe insulation pertaining to a boiler or hot water heater must be included in the modeling cost of the appliance and not modeled as a separate measure.
 - 7.2 Agencies may submit a waiver for the installation of pipe insulation for a boiler that does not meet the SIR requirements of 1.0 or greater and is not a H&S measure.
 - 7.3 Always use pipe wrap with a wall thickness of at least $\frac{5}{8}$ inch and cover elbows, unions, and other fittings to the same thickness as pipe.
 - 7.4 Keep pipe insulation at least six inches away from the combustion vent pipe, unless it has a fire safety rating for one inch of clearance.
 - 7.5 Use the correct size of insulation sleeve for the water pipe diameter.
- 8. **Water Heater Replacement or Repair**
 - 8.1 Health and safety replacement of water heaters is permitted on a case-by-case basis and repairing and cleaning of water heaters are allowed.
 - 8.2 Leaking water heater tanks require replacement of the entire unit.
 - 8.3 Expansion tanks should be installed if the existing water heater is being repaired or replaced and is required by local code.
 - 8.4 There must be no spillage at two minutes into the combustion cycle and there must be no fuel leaks present.
 - 8.5 CO in the undiluted flue gas must not exceed 200 ppm.
 - 8.6 Flex connectors that are brass, damaged, or older than from 1973 must be replaced.
 - 8.7 Copper lines for natural gas must be replaced with Gastite or black pipe.
 - 8.8 Unsafe conditions such as high CO, rollout, pilot issues, or spillage must be repaired by cleaning, tune-up, etc.
 - 8.9 If the repair cost is found to be greater than 25 percent of the replacement cost, the unit may be replaced.
 - 8.10 If a storage tank-type water heater or hot water storage tank is replaced and installed in a location where water leakage from the tank will cause damage, the tank shall be installed in a galvanized steel overflow pan and drain to the exterior.



- 8.11 Adequate combustion air must be provided to water heater closets for the proper operation of the water heater.
- 8.12 Exterior water heater closet doors may be insulated to an R-11 to complete the thermal boundary.
- 8.13 Water heaters must be insulated to a minimum R-11, if cost effective.
- 8.14 When the water heater closet contains a heater that is not sealed, combustion or power vented, the closet will be isolated/separated from the rest of the home through air sealing with fire-rated materials, if feasible.
- 8.15 When an atmospherically drafted water heater is located in an outside closet, testing at worst case depressurization is not required provided that there is no direct connection to the interior of the home that could cause spillage.
- 8.16 For information on water heater policy specific to mobile homes. See CEO-WAP- 901.
- 9. **Water Use Reduction**
 - 9.1 Shower heads and aerators must be assessed for a water saving replacement and a SIR of 1.0 or greater; subgrantees must have the client's permission to install low flow shower heads.
 - 9.2 If the showerhead and/or aerator is to be replaced, the plumbing must be evaluated to ensure that it is suitable to receive new fixtures.
 - 9.3 If the shower arm integrity is questionable, it also must be replaced at the time
- 10. **Lighting Assessment and Replacement**
 - 10.1 Clients will be provided an explanation of the electrical savings potential for switching from incandescent bulbs to compact fluorescent lighting (CFL), or from CFL to light emitting diode bulbs (LED).
 - 10.3 Subgrantees are required to install CFLs or LEDs in the client's home as long as it is cost effective. See CEO-WAP-703.
 - 10.4 For reporting purposes, documentation in the client file will include the number of CFLs or LEDs installed as well as any spares left with the client.
 - 10.5 CFLs or LED bulbs may be installed with an SIR of 1.0 or greater.
 - 10.6 All applicable bulbs must be disposed of as required by the state or local environmental regulatory agency.



CEO-WAP-808

Solar Photovoltaics

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [301](#), [404](#), [501](#), [502](#), [701](#), [904](#), [201 A2](#), [404 A3](#), [404 A8](#), [703 A1](#), [808 A1- A5](#); [WPN 23-6](#); [10 CFR Part 440.18\(b\) and ©](#); [Equitable Solar Solutions](#); [DOE Regulations](#); [Xcel's Solar*Rewards Program](#); [EPA lead-safe renovation requirements](#)

1. Abstract

1.1 The policy describes Colorado Energy Office Weatherization Assistance Program (CEO WAP) Solar Photovoltaics (PV) procedures, including subgrantee and client administrative and field requirements.

2. Overview

2.1 Client-owned rooftop solar systems are an optional measure for WAP and may be installed on its own as long as it is cost effective.

2.2 In most respects rooftop solar will be treated like any other measure being installed through WAP.

2.3 There is a difference between rooftop solar and other measures when it comes to funding strategies and rules applied to rooftop solar; those differences are further described in this policy.

3. Eligibility Requirements

3.1 All new weatherization jobs may be evaluated to receive solar.

3.1.1 Subgrantees may go back to previously weatherized homes closed on or after January 1, 2017 to determine if they would be eligible for rooftop solar.

3.2 The following are required for each client to be eligible to receive rooftop solar:

3.2.1 Be eligible for the Weatherization Assistance Program. See CEO-WAP-301.

3.2.2 If it has been 12 months or more since the application approval date, clients must have their income eligibility recertified to receive solar. The recertification date must be entered into Salesforce in the solar recertification field, not the recertification field for weatherization.



- 3.2.3 Be the owner and occupier of the home receiving rooftop solar,
 - 3.2.4 Be a tenant in a property which is designated as Section 8 or other long-term low-income housing provider,
 - 3.2.5 Be a tenant in a property owned by a non-profit focused on affordable housing,
 - 3.2.6 Choose to have rooftop solar installed on their home, as evidenced by signing the rooftop solar Owner Agreement. See CEO-WAP-808 A1.
- 3.3 The following are required for each unit to be eligible to receive rooftop solar:
- 3.3.1 Structurally sound roof at time of rooftop solar installation,
 - 3.3.2 An adequate electrical system at time of rooftop solar installation, and
 - 3.3.3 The unit must be eligible to be modified per Colorado State Historic Preservation Office (SHPO) agreement.
- 3.4 The following are the requirements for rooftop solar to be considered as a measure:
- 3.4.1 Meet state and local government, as well as utility requirements for sizing and capacity factor
 - 3.4.1.1 The program requires a **14 percent** per-system capacity factor as a reasonable production performance measure.
 - 3.4.2 All rooftop solar systems must achieve an SIR of 1.0 or greater (considering all contractor, material, and labor expenditures) over a 30 year lifespan to be installed. The subgrantee may submit a waiver for systems that do not meet this requirement for special circumstances.
 - 3.4.3 Use the rooftop solar worksheet (Appendix CEO-WAP-808 A2) to determine whether the rooftop solar measure meets the above criteria.
4. **Subgrantee Contract**
- 4.1 The subgrantee contracts and contract amendments with CEO will explicitly detail rooftop solar production goals. Similar to overall production goals, these rooftop solar production goals must be met in order to fulfill the contract.
5. **Production Goals**
- 5.1 Each WAP subgrantee will be required to commit to a rooftop solar installation production goal during development of the initial contract and/or contract amendments.



5.2 Production goals will be listed on the Budget Support Sheet (BSS) and included within the text of the contract.

6. Funding

6.1 Rooftop solar may be installed using allocated funding sources in subgrantees' budgets. Each program year, CEO WAP staff will provide guidance about the correct distribution of rooftop solar jobs across available funding sources.

6.2 DOE

6.2.1 Rooftop solar installed cost using a DOE funding is limited to a \$4,047 per unit average (PUA) overall for DOE funded rooftop solar units during a given program year per unit or the amount stated in accordance with [10 CFR Part 440.18](#) (b) and (c) which states the baseline expenditure of financial assistance provided under WAP for labor, weatherization materials, and related matters for a renewable energy system.

6.2.2 See [WPN 23-6](#), to reference rooftop solar allowable funding and the cost of living. This rooftop solar PUA will be tracked by a WAP program manager throughout the program year. DOE units with rooftop solar may require a file review by the DOE project officer before installation. See Appendix CEO-WAP-808 A3.

6.3 Using Multiple Funding Sources

6.3.1 For costs in excess of the cap in DOE solar jobs, additional funds must come from other funding sources.

6.3.2 Allowable solar funding sources are allocated in subgrantees' budgets.

6.4 Non-DOE

6.4.1 Rooftop solar installed cost using non-DOE funding sources is not limited to a specific PUA, nor is it limited to the DOE per unit average.

6.4.1.1 Non-DOE funds may vary and are allocated in subgrantees' budgets.

6.4.1.2 With HB-1105, Solar is only permitted in Investor Owned Utility (IOU) territory if the household already has that IOU as their electric provider (i.e.: Xcel or Black Hills Electric).

6.4.1.2.1. Solar measures may not be paid for with HB1105 if the measure would remove the home from the energy grid and customer from utility service.



7. Approval and Reporting

7.1 DOE Approval

7.1.1 All jobs with DOE funded rooftop solar may require approval from a DOE WAP Project Officer; requests must be processed through CEO.

7.2 CEO WAP Approval

7.2.1 Subgrantees new to rooftop solar installations (of any funding source) must get CEO approval for the first six projects by emailing their Program Manager and a QM Manager.

7.2.2 CEO may require additional rooftop solar reviews if at any time the subgrantee completion of high quality solar projects ceases. A PDF of the approval must be attached to the BWR.

7.3 Salesforce Reporting

7.3.1 Rooftop solar will be entered into Salesforce as a measure, and all fields under that measure must be filled out. See CEO-WAP-701 A1.

7.3.2 For Xcel solar jobs, subgrantees are required to enter Xcel Application Number and Product Type into Salesforce as soon as solar contractor submits application to Xcel.

7.3.2.1 This information must be collected from solar contractors once application is submitted.

7.3.3 All associated costs (e.g. Contractor, Materials, Labor) must be entered in the solar measure.sir

7.3.4 If the funding source used for the solar measure is different from Funding Source 1 at the overall job level, then it needs to be added as an additional funding source in Funding Source 2 or 3.

7.4 Utility Reporting and Invoicing

7.4.1 CEO WAP will report rooftop solar information to utilities as required. For utilities providing funding for rooftop solar, CEO WAP will invoice the utilities as necessary. The subgrantees must report solar unit activity to utilities as required for tracking purposes.

8. Solar Field Requirements

8.1 Ground Mount PV Systems

8.1.1 Ground mount PV systems may be installed but require DOE approval if funded by DOE.

8.1.2 All ground mount PV systems estimated to exceed \$15,000 must receive CEO approval. See section 8.2.



8.1.3 Ground mount PV systems are subject to NEPA review.

8.2 Solar Photovoltaic Systems

8.2.1 Subgrantees may evaluate the potential for solar Photovoltaic Systems (PV) as an optional Energy Conservation Measure.

8.2.2 As long as a PV system is cost effective, and other measures have been modeled in the home, it is acceptable to only do the PV system on a home without additional EC measures.

8.3 Site Evaluations

8.3.1 The subgrantee auditor should inspect the home during the initial energy audit to determine if the home is a good candidate for solar PV. The auditor should note the following items:

8.3.1.1 Age and condition of the roof, the roof covering type, roof orientation and roof tilt.

8.3.1.2 Any potential shading obstructions.

8.3.1.3 An evaluation of electricity usage.

8.3.1.4 The status and size of the home's main electrical panel.

8.3.1.5 Available locations for mounting electrical components.

8.3.1.6 Available square footage and estimate the number of modules that can fit on the roof.

8.3.1.7 After the subgrantee auditor determines that the home is a good candidate for solar PV, a solar PV site assessment must be performed by a qualified professional.

8.3.2 If site assessment determines the client's home is a good candidate for solar PV, a site assessment performed by a qualified professional and the CEO Solar PV Worksheet will be used to determine and verify system size, respectively.

8.3.3 The estimate of the annual generation from the PV site assessment will be used to create an Itemized Cost Measure in Weatherization Assistant.

8.4 General Requirements

8.4.1 All solar systems must achieve an SIR of 1.0 or greater (considering all contractor, material, and labor expenditures along with permits and fees) over a 30 year lifespan to be installed. The subgrantee may submit a waiver for systems that do not meet this requirement for special circumstances.

8.4.2 Roof repairs and electrical panel upgrades may be included as IRMs. Cumulative SIR for all solar expenditures, including IRMs, must achieve an SIR of 1.0 or greater over a 30 year lifespan.



- 8.4.3 Rooftop solar does not need to be run in Weatherization Assistant, it needs to be run through the Rooftop Solar Workbook (See CEO WAP 808 A2).
- 8.4.4 Rooftop solar array size will be capped at 7 kW or 100% of projected post-weatherization electricity usage, whichever is smaller.
 - 8.4.4.1 This cap will be applied to rooftop solar arrays installed in all utility service territories.
 - 8.4.4.2 Any home that is receiving rooftop solar and requiring an electric panel upgrade must upgrade to a 200 Amp electric panel.
 - 8.4.4.3 Homes receiving rooftop solar and having an existing electric panel with enough capacity for the rooftop solar array do not require an electric panel upgrade, however, in that case the electric panel upgrade may be made if the subgrantee chooses to do so.
 - 8.4.4.3.1. All associated costs for the electric panel upgrade may be charged to the Solar funding sources provided.
- 8.4.5 All equipment must be new and UL certified and listed on the *Go Solar California* website at <http://www.gosolarcalifornia.ca.gov/>.
 - 8.4.5.1 Waiver requests can be made if using Equitable Solar Solutions (see reference) as a vendor.
- 8.4.6 PV system installation must comply with local electric utility rules, regulations, and requirements.
- 8.4.7 All solar PV systems will include theft deterrent devices, such as break away nuts and bolts, that will not void the PV panel/module manufacturer's product warranty or production warranty.
- 8.4.8 All solar PV installations must be final inspected by a competent and qualified inspector.
 - 8.4.8.1 Final inspection must verify that any and all permits are signed off by all required parties.
 - 8.4.8.2 The inspector must also perform the following:
 - 8.4.8.2.1. Confirmation of warranty information provided to homeowner and client education provided by PV installation contractor
 - 8.4.8.2.2. Client interview for satisfaction
 - 8.4.8.2.3. Solar Final Inspection Addendum is completed and attached to the Subgrantee Final Inspection Form.



8.5 Solar PV Subcontractor Requirements

- 8.5.1 Subgrantees will individually arrange subcontractor services for rooftop solar installation. See CEO-WAP- 501.
 - 8.5.2 Subgrantees are required to include language in their subcontractor contracts that:
 - 8.5.2.1 Require the subcontractor to apply for Xcel Solar projects in the Xcel Portal under the CEO Program. See appendix 808 A5 for instructions.
 - 8.5.2.2 Require the subcontractor to provide the Xcel application numbers and selected Product Type (e.g.: “CO - 2024 Income Qualified On-Site Solar (CEO)) to the subgrantee, so CEO WAP is able to cross-reference applications with Xcel report and ensure applications are being submitted under the CEO Program.
 - 8.5.3 Subcontractor shall provide site assessment, installation, and warranty services during normal working hours, at a minimum.
 - 8.5.3.1 Normal working hours are defined as Monday through Friday, 8:00 a.m. through 5:00 p.m. Mountain Time.
 - 8.5.4 Subcontractor will ensure that personnel are prepared and capable to instruct the WAP customers on system operations, provide all warranty information, and operating manuals to the WAP customer and weatherization subgrantee upon request.
 - 8.5.5 The subcontractor will ensure that the installed system is operating properly.
 - 8.5.6 Subcontractor will provide Manufacturer’s Specification Sheets for:
 - 8.5.6.1 Each type of PV panel/module proposed in response, including warranty information.
 - 8.5.6.2 Each type of inverter proposed in response, including warranty information.
 - 8.5.6.3 The mounting frames, brackets, and any other roof mounting equipment for the installation of the rooftop solar PV system, including warranty information.
- 8.6 Subcontractor will provide:**
- 8.6.1 All labor, materials, permits, supplies, equipment, and supervision required to design, furnish, construct, and commission the rooftop solar PV system, including all necessary devices and connections between inverter and main electrical service.



- 8.6.2 As-built versions of the submittals and drawings by soft copy, including shade analyses.
- 8.6.3 Installation drawings and field wiring diagrams.
- 8.7 Confidentiality of all eligible WAP customers served by the subcontractor is required in accordance with the Privacy Act of 1974.**
 - 8.7.1 Subcontractors shall be responsible for the privacy of all data disclosed to them as necessitated to participate in this project.
- 8.8 Subcontractor shall agree to attend any pertinent meetings/conference calls as deemed necessary by any subgrantee, CEO, and/or utility.**
- 8.9 Invoices submitted by subcontractors will be authorized for payment only after all required forms and documents have been submitted, and the weatherization subgrantee verifies that all work is completed and conforms to the project standards and requirements.**
- 8.10 Callbacks required solely due to subcontractor error, and/or deficiencies in subcontractor work, will be performed promptly, and subcontractors will be responsible for all associated expenses.**
- 8.11 Subcontractor is solely responsible for determining the techniques, means, methods, and materials of installation to meet the requirements of this solicitation and subsequent contract(s).**
- 8.12 All work shall comply with the following standards, regulations, policies, and procedures:**
 - 8.12.1 OSHA worker safety regulations (29 CFR 1910 & 1926)
 - 8.12.2 CEO WAP Policies and Procedures
 - 8.12.3 DOE Federal Regulations (see reference)
 - 8.12.4 Xcel Energy's Solar*Rewards Low-Income Rooftop Program (see reference)
 - 8.12.5 EPA lead-safe renovation requirements and the EPA Renovation, Repair and Painting Rule
 - 8.12.6 All DOE requirements for lead-based paint safe work practices NESC (National Electrical Safety Code), ANSI (American National Standards Institute), IEEE (Institute of Electrical and Electronic Engineers), NEC (National Electrical Code), UL (Underwriter's Laboratory), as well as local code requirements.
- 8.13 Owner Agreement and Client Education**
 - 8.13.1 Owner Agreement**
 - 8.13.1.1 Due to the long lifespan of rooftop solar, clients need to be properly informed about their system.
 - 8.13.1.2 The rooftop solar Owner Agreement provides a structured way to inform the client about their rooftop PV.



8.13.1.3 Clients are required to sign off on the Owner Agreement prior to receiving the rooftop solar. See Appendix CEO-WAP-808 A1.

8.13.2 Client Education

8.13.2.1 In order for clients to maximize the benefits of their rooftop solar, they must be educated about the systems.

8.13.3 Subcontractors and final inspectors will be responsible for ensuring this education occurs. See CEO-WAP-304.

8.13.3.1 Individual subgrantee offices or organizations may develop their own photovoltaic education materials and owner agreement forms as they see fit as long as they do not negate the regulations set forth in CEO WAP policy.

9. Warranty Repairs

Although the WAP clients will own the rooftop solar systems, they will not be responsible for repairs that result from manufacturer or installation defects

9.1 All solar PV systems must carry at least a five year workmanship warranty from the manufacturer and selected subcontractor(s) that includes parts and labor.

9.1.1 Warranty shall start on the date of the weatherization subgrantee's final inspection.

9.2 PV modules must carry at least a 10 year manufacturer's product warranty, and at least a 20 year manufacturer's performance/output warranty that modules will generate no less than 80 percent of rated output under Standard Testing Conditions (STC). Inverters shall be UL 1741 certified, and shall be, at a minimum, string inverters with DC optimizers or micro-inverters, with a minimum 10 year manufacturer warranty. All inverters shall have a manufacturer's extended warranty purchased whenever available and included in the system cost. The extended warranties should be included as part of the documentation in the client file.

9.3 Performance of Warranty Repairs

9.3.1 All warranty issues that arise within the five year warranty period will be directed to the subgrantees to navigate the repair process.

9.4 Subgrantees will work with subcontractors or in-house staff to have repairs performed.

9.5 Expenditures for repairs may only be reimbursed from the subgrantee's appropriate non-Federal funding sources.

9.6 When warranty issues arise within the five year warranty period, manufacturers' parts warranties must always be pursued first.



- 9.6.1 If the manufacturer's warranty process results in an unreasonable wait time for a repair, the subgrantee agency may move forward with the purchase of necessary equipment for the repairs.
- 9.6.2 Thorough documentation must be kept in the client file that provides justification for not utilizing the manufacturer's warranty.
- 9.7 System monitoring will not be provided for by CEO WAP and is the responsibility of the client to monitor their systems.
- 9.8 Subgrantees may include the cost of monitoring in the SIR calculation. If the SIR remains above 1.0 monitoring may be included in the purchase of the system.



CEO-WAP-809

Electric Appliances

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO WAP: [802](#), [201 A2](#); [NEEP list](#)

1. Abstract

1.1 This policy outlines the scope of allowable electric appliances, as well as information regarding system design and installation, training, reporting, and funding.

1.2 History: Beginning July 1, 2019, CEO WAP initiated a pilot program for electric appliances with the goal to learn the most effective and efficient conditions under which to install air source heat pumps (ASHPs), heat pump water heaters (HPWHs), and other electric appliances. This pilot program allowed the installation of electric appliances that were not considered cost effective and/or required the appliance to be switched from propane (or in some cases, natural gas) to electric. Propane or electrically heated homes that were previously weatherized were allowed to be reconsidered for these electric appliances, but only homes that were previously weatherized after July 1, 2017.

2. Scope of WAP Electric Appliance Measures

2.1 The targets for installation of electric appliances within Colorado WAP includes:

2.1.1 The installation of space heating and cooling air source heat pump (ASHP) systems

2.1.2 Heat pump water heaters (HPWHs)

2.1.3 Electric ovens with induction ranges

2.1.4 Replacement of other propane-fired appliances (like dryers) with electric appliances

2.1.5 Upgrading electrical service when needed to install electric appliance measures.

2.2 The following general rules for electric appliance installation will apply:



- 2.2.1 Fuel switching is only allowable for propane to electric conversions. If fuel switching from natural gas, a State Waiver is required.
 - 2.2.1.1 Fuel switching is not allowable with DOE funds, even with an approved State Waiver.
- 2.2.2 Any home receiving weatherization AND an ASHP cannot be closed until all weatherization measures, including the ASHP, have been installed and inspected.
- 2.2.3 Propane heated homes must be evaluated to replace all propane fired appliances with electric, including ASHP space heating and cooling, ASHP water heater, electric or induction range, and other propane-fired appliances as appropriate.
 - 2.2.3.1 While the goal is to completely disconnect these homes from propane, it is allowable to not replace all propane-fired appliances, based on feasibility and client acceptance.
 - 2.2.3.1.1. Thorough documentation showing why all propane-fired appliances were not able to be replaced must be kept in the client file.
- 2.2.4 Electric heated homes should be evaluated for cold climate ASHP (ccASHP) cost effectiveness.
 - 2.2.4.1 A ccASHP must be installed in an electrically heated home if the ASHP has an measure SIR of 1.0 or greater, and the cumulative SIR is greater than 1.0
 - 2.2.4.2 If an ASHP is not cost effective, the home must be evaluated for a rooftop solar photovoltaic array with a maximum size of 7kW.
 - 2.2.4.3 If the home is not a good candidate for rooftop solar, the allowable ASHP SIR may be under 1.0, so long as the ASHP is included in the package of measures resulting in a cumulative job SIR of 1.0 or greater.
 - 2.2.4.4 Documentation must be included in the client file and BWR that identifies these items were evaluated.
- 2.3 Homes that were weatherized between July 1, 2017 to June 30, 2021, may be re-evaluated for electric appliances in accordance with section 2.2 of this policy.
 - 2.3.1 Subgrantees must recertify the client's income when returning to a previously weatherized home for electric appliance measures, if it has been 12 months or more since application approval date.



2.3.2 Additional electric appliances may NOT be installed if an ASHP was previously installed.

2.3.2.1 Subgrantees may only go back to a closed job to assess for the installation of electric appliances, if the home was not previously evaluated for electric appliances. See examples below:

2.3.2.1.1. A home received an ASHP in May 2021; subgrantees may NOT go back to install a HPWH, or other electric appliances.

2.3.2.1.2. A home only received regular weatherization measures in June 2021, or a HPWH as a HS measure; subgrantees may go back to install an ASHP with other applicable electric appliances (ASHP, range and/or dryer).

2.3.2.1.3. Beginning July 1, 2022, all propane and electric homes should have been evaluated for electric appliances as outlined above, and as such, those homes may not be re-evaluated.

3. System Design for Air Source Heat Pumps, Approval, and Installation

3.1 ASHP measures must be NEEP listed (see reference) for both heating and cooling, or meet the minimum performance conditions:

3.1.1 For Non-Ducted Systems ccASHP: 18+ SEER or 18+ SEER2, 11.5+ EER or 11.7+ EER2, 9.5+ HSPF or 8.1+ HSPF2; Heating BTU at 5F must be at least 70% of heating BTU at 47F

3.1.2 For Ducted Systems: 18+ SEER or 18+ SEER2, 11.5+ EER or 11.7+ EER2, 9.5+ HSPF or 8.1+ HSPF2; Heating BTU at 5F must be at least 70% of heating BTU at 47F

3.1.3 For Dual Fuel Systems: 15+SEER or 15.2+ SEER2, 11.5+EER or 11.7 EER2, 9+HSPF or 7.8+ HSPF2

3.2 Order of preference for ASHP installations on propane heated homes are:

3.2.1 ccASHP, either ducted or non-ducted

3.2.2 Integrated dual fuel systems, with condensing forced air furnace and ASHP

3.3 Integrated dual fuel systems may be installed in a propane home if it aids in the adoption of an ASHP. The fuel-fired furnace installed must be condensing if feasible. If not feasible, thorough documentation must be kept in the client file or in Salesforce. Design heat load requirements must be met for all installations and integrated controls must be



- 3.4** In order to meet the design heating load for ducted ASHPs, integrated supplemental heating must be installed, whenever required, in accordance with ACCA Manual J, S, and D design criteria.
- 3.5** Existing heating systems may be left in place if there are no health and safety concerns and are appropriate to provide secondary heating for non-ducted ASHP.
 - 3.5.1** Existing non-condensing forced air systems may not be left as a stand alone system.
 - 3.5.2** Examples of secondary heating systems are existing fireplaces, wood stoves, electric baseboards, or wall furnaces.
- 3.6** For the first 10 ASHP systems installed by an agency/office in a propane or electric home, each system must receive approval through Salesforce by entering data into the ASHP measure and uploading all required documents as attachments. Then, CEO Quality and Technical Manager must be notified that an ASHP is ready for approval in Salesforce.
 - 3.6.1** The following required documents must be included in the client file and uploaded to Salesforce, even after an agency/office has completed their first 10 installs:
 - 3.6.1.1** System design documents including model numbers, manufacturers spec sheets, and AHRI certificates.
 - 3.6.1.1.1.** Spec sheets for Heat Pump Water Heaters must also be uploaded to Salesforce.
 - 3.6.1.2** Heat load calculation.
 - 3.6.1.3** Weatherization Assistant Recommended Measure Report.
 - 3.6.1.4** Itemized cost estimate/quote for system, repairs, and other fees.
 - 3.6.1.5** Estimates from contractors should have model numbers of equipment to be installed included in the estimate.
 - 3.6.1.6** NEEP list print out verifying that the system is NEEP cold climate air source heat pump approved.
 - 3.6.1.7** Other documents that are typically included in the file for ASHPs.
- 3.7** A waiver must be submitted, and Salesforce approval processes followed for all natural gas conversions to electric.
- 3.8** Clients must be educated on the functioning of the AHPS to maximize comfort and savings.



- 3.8.1 Agency field staff must provide and be knowledgeable enough to walk through educational material from [NEEP](#) with the client, even if the ASHP is installed by a subcontractor.
- 3.9 Clients must be left with the user's manual, warranty information, installation instructions, and installer contact information.
- 3.10 Subgrantees may work together with subcontractors to provide installations with the purpose of increasing subgrantee and contractor experience with ASHP technology.
- 3.11 **Warranty for ASHPs and HPWHs**
 - 3.11.1 A minimum five year warranty for materials, workmanship, and serviceability will be provided to occupants upon completion of work for heat pump water heaters and air source heat pump heating systems.
 - 3.11.2 When warranty issues arise within the five year warranty period, manufacturers' parts warranties must always be pursued first.
 - 3.11.2.1 If the manufacturer's warranty process results in an unreasonable wait time for a repair, the subgrantee agency may move forward with the purchase of necessary equipment for the repairs.
 - 3.11.3 Thorough documentation must be kept in the client file that provides justification for not utilizing the manufacturer's warranty.
- 4. **Associated measures**
 - 4.1 If an electrical service upgrade is needed in order to install an ASHP, a 200 amp electrical service panel must be installed.
- 5. **Staff Training**
 - 5.1 CEO WAP staff will provide ASHP system training opportunities for subgrantees.
 - 5.2 Subgrantees are responsible for finding the additional/supplemental training for their staff.
 - 5.2.1 Work with ASHP distributors and manufacturers for training.
 - 5.2.2 Work with other subgrantees to crosstrain on ASHP system installation.
- 6. **Salesforce Reporting**
 - 6.1 Electric appliance measures must be indicated as EC or HS in Salesforce.
 - 6.2 When the electric appliance replaces a non-electric source, the "fuel switch" checkbox must be checked for the following measures:
 - 6.2.1 Air Source Heat Pump
 - 6.2.2 Heat Pump Water Heater



- 6.2.3 Electric/Induction Range
- 6.2.4 Electric Dryer
- 6.3 Water Heater Measures:
 - 6.3.1 Select the appropriate water heating appliance under the “Water Heater Type”.
- 6.4 All associated costs (e.g. Contractor, Materials, Labor) must be entered in the measure.
 - 6.4.1 Assign the ASHP/Electric Appliances funding source that was used for the measure(s) in the “Funding Source” dropdown field.
- 7. **Funding**
 - 7.1 Electric appliances that are not cost effective and part of a fuel-switching scenario, are to be charged to the assigned funding source in subgrantees’ budgets.
 - 7.2 Electric appliance measures done for health and safety purposes (e.g.: heat pump water heater) must be charged to Health and Safety within the appropriate EE funding source.
 - 7.3 In all-electric homes where an electric appliance measure is cost effective and there has been no fuel switching, the measure is to be charged to an appropriate EE funding source.
 - 7.4 When fuel switching occurs, the use of HB-1105 is only permitted in Investor Owned Utility (IOU) territory if the household has an IOU as their *electric* provider (Xcel or Black Hills Electric).
 - 7.4.1 No electric appliance measure may be installed in a non-IOU electric territory using HB-1105 funds.



CEO-WAP-901

Manufactured Homes

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [701](#), [805](#)

1. Abstract

1.1 A manufactured home is built to the Manufactured Home Construction and Safety Standards (HUD Code) and displays a certification label on the exterior of each transportable section.

2. Definition

2.1 Manufactured homes are built in the controlled environment of a manufacturing plant and are transported in one or more sections on a permanent chassis.

3. General Requirements for Manufactured Homes

3.1 The Manufactured Home Energy Audit (MHEA) should be used to evaluate measures for manufactured homes.

3.2 When a manufactured home has characteristics that cannot be accurately represented in MHEA, the National Energy Audit Tool (NEAT) may be used for evaluation purposes.

3.3 Regardless of the audit tool used, if the unit is classified by Housing and Urban Development (HUD) as a manufactured home, all manufactured home requirements must be followed, and the unit must be reported as a Manufactured Home in the Building Weatherization Report (BWR).

3.4 The following measures shall be given the life span recommended by MHEA

3.4.1 Building shell appliance

3.4.2 Air-Leakage

3.4.3 Door

4. General Assessments

4.1 The structural condition of the home, floors, walls, and ceiling will be assessed.

4.1.1 Issues of moisture, mold, and mildew, will be assessed especially in:

4.1.1.1 Bathrooms, kitchens, ceilings, and subspace areas.

4.2 These issues may be addressed by:



- 4.2.1 A six millimeter ground barrier that may be installed under mobile homes.
 - 4.2.2 Avoiding frozen pipes must be considered without creating an additional utility burden (e.g., heat tape).
 - 4.2.3 Roofs must be sealed or repaired to prevent leaks when insulation is added to the roof or assessed as an Incidental Repair Measure (IRM) associated with an Energy Conservation Measure (ECM).
- 5. Cavity Assessment**
- 5.1 Assess and document the ceiling cavity size and the existing R-value near the center of the cavity.
 - 5.1.1 For pitched roofs, input additional belly insulation to be added to the existing insulation, not cavity size, in MHEA.
 - 5.2 Assess and document the following for all bellies and walls
 - 5.2.1 Cavity size
 - 5.2.2 Insulation type
 - 5.2.3 Batt size
 - 5.2.4 The existing R-value
 - 5.2.5 Belly wings and the center may be different cavities and have different batt sizes.
 - 5.3 Assess and document the perimeter/skirting, height, length and existing R-value.
 - 5.3.1 The floor (belly) must be assessed as a belly in MHEA.
 - 5.3.1.1 If the belly is cost-effective to insulate, the perimeter may be insulated to a minimum of R-11 encapsulated in six millimeter plastic without repairs to the belly, or the belly can be insulated and repairs made to complete the air/thermal boundary.
 - 5.3.1.2 When the belly is not cost effective to insulate, repairs can be made, such as stuff and patch, as an Air Leakage ECM or an IRM associated with an ECM.
 - 5.3.1.3 Belly return systems must be sealed and return air grills must be installed in the furnace closet door, or through a wall, for a return air path to the furnace.
- 6. Duct Work Assessment**
- 6.1 Ductwork must be assessed for damage, debris, and leakage and to ensure that it is properly connected.
 - 6.2 Pressure pan testing must be performed and documented before and after duct sealing.
 - 6.2.1 Sealing is not required if the pressure pan measures 1.0 or fewer Pascals.



- 6.3 Duct work that obstructs impeding air flow must be corrected.
 - 6.3.1 Duct repairs (i.e. boot repairs) and duct cleaning may be included as IRM associated with duct sealing.
- 6.4 The furnace plenum connection to the main trunk line must be sealed, if cost effective and duct sealing is performed.
- 6.5 Crossover ducts must be installed as straight as possible, mechanically fastened at both inner and outer liner, properly sealed, and insulated to a minimum of R-8 and 26 gauge rigid ducts must be installed whenever possible, rigid elbow or its equivalent will be installed in crawl space crossover ducts.
- 6.6 Crossover ducts will be installed so they are not in contact with the ground.
- 6.7 Only uninsulated ducts outside the thermal boundary are required to be insulated to a minimum of R-8.
 - 6.7.1 If there is any existing duct insulation, additional insulation is not required.
 - 6.7.2 Gaps in existing insulation must be patched.
- 7. **Water Heater Assessment**
 - 7.1 Newly-installed combustion appliances shall be sealed combustion type or rated for manufactured home use.
 - 7.2 **Exterior Closet Water Heaters**
 - 7.2.1 If a manufactured home has an unapproved water heater in an exterior closet with no imminent health and safety issues, the water heater can be left in place, but no repairs can be made to the water heater.
 - 7.2.1.1 Do not install tank or pipe insulation on unapproved water heaters.
 - 7.2.2 If a water heater is located in an exterior closet and is not sealed combustion, direct vented or power vented, then the closet will be isolated/separated from the rest of the home through air sealing with fire-rated materials, as feasible.
 - 7.2.2.1 If the water heater in an exterior closet is replaced, it must be mobile home approved.
 - 7.2.2.1.1. It may be an atmospherically venting water heaters are permitted if there is adequate combustion air to the closet.
 - 7.3 **Interior Closet Water Heaters**
 - 7.3.1 If an existing water heater is located in an interior closet, the water heater must be manufactured home approved and also



- 7.3.1.1 Atmospherically venting units are not approved for this location.
 - 7.3.1.2 If a manufactured home has an unapproved water heater in an interior closet or is not approved for the location where it is installed, the water heater must be replaced or the unit must be deferred.
 - 7.3.2 A replacement water heater for an interior closet must be manufactured home approved and approved for the location where it will be installed or electric.
 - 8. Venting Requirements**
 - 8.1** Clothes dryers must vent to the outdoors.
 - 8.2** Gas dryers must be vented with gas rated material.
 - 9. Doors & Windows Requirements**
 - 9.1** Doors
 - 9.1.1 Doors may be replaced as a stand-alone measure as long as it is cost effective.
 - 9.1.1.1 This may be done as an ECM, or as part of the Air Leakage ECM.
 - 9.2** Window Assessment
 - 9.2.1 Existing single pane windows must be assessed to add storm windows or may be assessed for double pane replacement windows.
 - 9.2.1.1 Pin-on or self-storing storm windows must be installed if cost-effective.
 - 9.2.1.2 Storm windows will not interfere with the operation of egress rated windows.
 - 9.2.1.2.1. Egress windows and doors must not be made to prevent entry or exit in the case of an emergency.
This requirement supersedes all other requirements.
- 10. Insulation**
 - 10.1** Insulated skirting must be assessed in MHEA.
 - 10.2** Wall cavities may be insulated with fiberglass batts or blown fiberglass insulation.
 - 10.3** Water pipes that are susceptible to freezing must be insulated and the cost must be included as an incidental repair associated with an ECM.



CEO-WAP-902

Inspection Requirements

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [102](#), [306](#), [601](#), [602](#), [603](#), [801](#), [903](#), 801 A1-2, 902 A1-3; [10 CFR 440.21](#)

1. Abstract

1.1 This policy outlines the expectations for subgrantees to perform the final inspection for single family and individually heated multifamily units.

2. Agency Quality Control Inspection

2.1 In accordance with Colorado Energy Office (CEO) Weatherization Assistance Program (WAP), it is mandated that subgrantees use a properly trained and certified Building Performance Institute (BPI) Quality Control Inspector (QCI) to perform a final inspection on all weatherization jobs.

2.2 A final inspection must be done after all work is completed, including sub-contracted work, and the inspector must ensure that any building department permits required are in the client file.

3. Auditors & Inspectors

3.1 The QCI assigned to perform the final inspection for the unit cannot have been the Energy Auditor, installed any measures in that unit, nor have been a member of the crew that completed the work for that unit.

3.2 Subgrantees are required to use the standard CEO WAP audit or a subgrantee audit with CEO prior approval.

3.3 Final Inspectors are required to use the CEO inspection form.

4. Quality Control

4.1 The subgrantee Program Manager has overall responsibility for proper implementation of the procedures and for the quality control of all repair and energy conservation work.

4.2 Any work not meeting quality expectations may be subject to special conditions, re-inspections, and go-backs. See CEO-WAP-102 & 903.

5. Compliance

5.1 The inspector must ensure that an accurate audit assessment was completed and that measures that qualify for installation comply with C C CEO WAP P CEO-WAP-



6. Contractors

6.1 Subgrantees may use a third party Quality Control Inspector (QCI) to meet this requirement, including other Colorado Weatherization subgrantee staff and/or an independent BPI certified QCI.

7. Completed Units

7.1 No dwelling unit may be reported as completed until all weatherization materials have been installed and the CEO WAP subgrantee has performed a final inspection, including any mechanical work performed and work performed by subcontractors.

8. Exceptions

8.1 Refrigerator

8.1.1 The verification inspection of the installation of a refrigerator may be performed by a competent subgrantee employee.

8.2 Unresponsive Client

8.2.1 If the client is unresponsive to legitimate requests to visit the home in order to perform a final inspection, the subgrantee may submit a waiver to CEO WAP requesting that the inspection be waived. Final inspections may only be waived for jobs without DOE funding.

8.2.1.1 Jobs that use DOE funding may not be closed without a final inspection.

8.2.2 The subgrantee must submit documentation of the number of attempts, time of day, and the dates upon which they made their requests.

8.2.3 Subgrantees should attempt to schedule final inspections even after a waiver has been granted.

8.2.4 Abuse of this policy may result in a requirement to return to the unit in order to perform the inspection.

9. Client Signature on Inspection Form

9.1 A clarifying statement is crucial should a complaint or threat of legal action be initiated, as well as including the one year warranty.

9.2 The client signature on the inspection form is required.

9.2.1 A significant effort must be made to obtain the signature, including mailing of the form along with a return, stamped envelope.



10. Materials

10.1 The QCI must ensure all installed weatherization materials meet the materials standards taken from Appendix A of 10 CFR 440, be of good quality, and be installed in a safe and effective manner.

11. Weatherization Assistance Database

11.1 All subgrantees must review and update their setup and supply libraries annually to ensure accurate measure costs for labor and materials.

11.2 Subgrantees must submit to CEO updated libraries by August 15th of each new program year.

12. Re-Inspection

12.1 Based on Deficiencies noted in a CEO WAP inspection visit, CEO WAP Staff may require a subgrantee to re-inspect up to 100 percent of installed measures if the quality of completed work is perceived to be deficient.

12.2 Re-inspection will be performed by a QCI, who is someone other than the auditor or any crew members who worked on the home.

13. Suspension of Quality Control Inspectors

13.1 For information on subgrantee standing, monitoring, and inspection see CEO-WAP-601-603.

14. Client File Documentation Requirements: See CEO-WAP-306.

15. Quality Complaints

15.1 Internal Quality Complaint Procedure

15.1.1 All subgrantees are required to have a written complaint procedure.

15.1.2 It is important that the complaint be well documented and include pertinent information such as client information, file number, stated problem, the root cause of the situation, and resolution.

15.1.3 Any substantiating evidence should be included such as photos, staff written comments, defective materials, additional costs, etc. See Appendix A of 10 CFR 440.

15.2 Internal Quality Complaint Log

15.2.1 Complaints are costly and doing a job correctly the first time is paramount to a low cost program.

15.2.2 Each subgrantee, as part of their complaint procedure, will keep a log which includes: the file number, reason for complaint, associated costs to obtain a resolution.

15.2.2.1 A complaint is defined as any verbal or written feedback, of any kind, that communicates dissatisfaction with WAP.

15.2.2.2 All complaints must be dealt with as soon as possible.



15.3 External Quality Complaints

- 15.3.1 When a complaint is received by CEO WAP, a formal report of the complaint will be initiated.
 - 15.3.2 The relevant subgrantee will be required to work closely with CEO WAP to investigate and/or provide information to prove or disprove the complainant's concerns, complaints, and/or allegations.
 - 15.3.3 A root cause will be determined and documented as well as a resolution be determined between all parties involved.
 - 15.3.4 Complaints received by CEO WAP will be kept on file by a WAP PM.
 - 15.3.5 A copy of the final report will be sent to the subgrantee to be included in the client file.
- 15.4 A regular review will be completed to see if trends exist that need to be addressed.
- 15.4.1 Trends may indicate if the complaint points to the same employee, same material failure, the same type of damage, etc.
- 15.5 The analysis should result in corrective actions being implemented to prevent further occurrences.

16. State Monitoring General Requirements

16.1 Quality Non-Compliance

- 16.1.1 Discoveries of violations of requirements and procedures will be subject to corrective actions, required go-backs and/or special conditions. See CEO-WAP-602.

16.2 Monitoring report

- 16.2.1 When similar Minor Deficiencies are found on two or more consecutive monitoring visits they may be elevated to a Major Deficiency.

16.3 Recommendation

- 16.3.1 For monitoring conditions observed that do not constitute substantial noncompliance with CEO WAP Policy or CFG.

16.4 Best Practice

- 16.4.1 For weatherization work installed, or a weatherization process completed, that is exemplary in nature, CEO staff may make a best practice determination.

17. State Monitoring Field Visit Requirements

17.1 Inspection Report

- 17.1.1 An inspection visit report will be provided to CEO WAP Subgrantees within 30 days of the visit.



17.2 Scheduling Visits

- 17.2.1 Subgrantees will cooperate with CEO WAP staff in coordinating and scheduling quality assurance inspections on homes.

17.3 Inspection Appeals

- 17.3.1 Subgrantee appeals to inspection reports must be made in writing to the CEO WAP Quality Manager within 20 days from the report date. Subgrantees can appeal the CEO WAP Quality Manager's decision in writing to the CEO WAP Program Director within 10 days of receipt.

17.4 Subgrantee Inspection Follow-up

- 17.4.1 Subgrantees must contact CEO WAP within 30 days to verify inspection of Major Deficiency and required go backs have been completed or within 30 days of the final appeal decision.

17.5 Included in Inspections

- 17.5.1 During field QA Monitoring the following items will be included but not limited to:

- 17.5.1.1 Subgrantees will have an internal quality assurance inspection process to determine that all materials reported on the BWR are present in the unit and that all energy savings measures listed on an accurate NEAT/MHEA analysis are installed.
- 17.5.1.2 Use of Weatherization Assistant (NEAT & MHEA) is required.
- 17.5.1.3 Subgrantees are required to document input for all applicable information on costs for measures, materials, and fuel types used in these audits.
- 17.5.1.4 Additional information detailing the subgrantee's method for ensuring accuracy of cost estimation information is required as well.
- 17.5.1.5 If a measure or repair installed under CEO WAP is determined not to be in compliance with CEO WAP Policy, and a state waiver has not been issued, then the expenditures for that measure may be subject to special conditions.
- 17.5.1.6 Deficiencies, poor workmanship, improper application of methods, techniques, or materials listed under the procedures sections will be considered a Major Deficiency.
- 17.5.1.7 Minor deficiencies about subgrantee operations, tools, or equipment will be noted and discussed in the inspection report.

- 17.5.1.7.1. Similar deficiencies that are found on more than one inspection visit may result in the subgrantee being prohibited from performing the specific procedures until they have met the conditions of an improved quality implementation plan as approved by CEO WAP staff.



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CEO-WAP-903

Call Backs & Go Backs

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [306](#), [603](#); [10 CFR 440.18\(f\)](#); [WPN 11-3](#)

1. Abstract

1.1 The following criteria and procedures are offered to provide a better understanding of the subgrantee's responsibilities and authority in regards to re-weatherization work allowable under this policy.

2. Overview

2.1 It is the policy of Colorado Energy Office Weatherization Assistance Program (CEO WAP) that every completed and reported unit meets all applicable requirements of the CEO WAP Policies and Procedures.

2.2 Work performed continues to function as intended for at least one year, excluding abuse, lack of normal maintenance, fire, other unusual circumstances of accident, or weather.

2.3 Some problems that may arise are covered by 10 CFR 440.18(f) while other situations may be less clear.

3. Warranty Period

3.1 Per Colorado Field Guide, a minimum one year warranty for materials, workmanship, and serviceability will be provided to occupants upon completion of work.

4. Definitions

4.1 Go Back: when a unit **requires additional work *during the program year*** in which the job was reported Closed.

4.1.1 Depending on the severity of the error or neglected item, the go back may result in a deficiency.

4.1.2 This does not pertain to the "Go backs" listed in the Final Inspection report.

4.2 Call Back: is a unit which **requires corrective work *after the program year*** in which the job was reported Closed



5. Call Back and Go Back Procedures

- 5.1 If the client requests a Call Back or Go Back, the subgrantee must determine that the problems are a result of substandard workmanship, materials, or failure to meet CEO WAP Standards and Guidelines.
- 5.2 Correction: includes re-addressing measures reported on the original BWR, or measures unjustifiably omitted from the original work but were allowable according to CEO WAP Policies and Procedures in effect at the time.
- 5.3 If the subgrantee determines that the failure is a result of substandard workmanship or materials, the cost for the correction of the problem is to be explored and the proper steps are to be taken to correct the situation.
- 5.4 If a subcontractor was involved and the subgrantee determines that responsibility for the Call Back or Go Back lies with the subcontractor, the subgrantee should pursue the resolution with the subcontractor.
- 5.5 The subgrantee must determine whether its liability insurance can cover the problem and, if so, to what extent it will pay for the corrections.

6. Reporting Call Backs and Go Backs

- 6.1 The subgrantee will be responsible for remedying all Call Back or Go Back issues, per DOE standards. See 10 CFR 440.18 (f).

7. General Reporting Requirements

- 7.1 Subgrantees will enter all Go Backs and Call Backs for single family units by the standard reporting deadline of the 18th of each month.
- 7.2 Subgrantees will be reimbursed by submitting the standard monthly invoice.
 - 7.2.1 Allowable expenses include labor, materials, and other WAP allowable costs.

8. CEO WAP Database

- 8.1 Both Call Backs and Go Backs must be reported in the CEO WAP Database as soon as they are completed.
- 8.2 Instructions for reporting a Call Back or Go Back in CEO WAP Database:
 - 8.2.1 Ensure the following information is on on the job in Salesforce:
 - 8.2.1.1 Job Number of for the unit where the Call Back or Go Back is being performed
 - 8.2.1.2 Associated file attachments
 - 8.2.1.3 Funding source: HB 1105 should be used if in IOU territory, and LEAP if they are not
 - 8.2.1.4 Type: either Call Back or Go Back



- 8.2.1.5 Date Entered is the date on which the Call or Go Back is completed
- 8.2.1.6 Region where the Call Back or Go Back is being performed
- 8.2.1.7 Program Year of the actual program year that the Call Back or Go Back occurred, not the original date that the work was completed
- 8.2.1.8 Material Cost of the Call Back or Go Back
- 8.2.1.9 Labor Cost of the Call Back or Go Back
- 8.2.1.10 Contractor Cost of the Call Back or Go Back
- 8.2.1.11 Reason for the Call Back or Go Back
- 8.3 Funding Source for CEO Reimbursement**
 - 8.3.1 Per DOE WPN 11-3, DOE funding may not be used for any Call Backs or Go Backs.
 - 8.3.1.1 HB 1105 may be used within the appropriate IOU territory.
 - 8.3.1.2 LEAP should be used if they are not in IOU territory.
 - 8.3.2 Grantees must coordinate with their financial office to ensure proper accounting methods are followed.
- 8.4 Waiver Process**
 - 8.4.1 In the event that it is necessary for a subgrantee to use federal funds for Call Backs or Go Backs, the subgrantee shall submit a waiver to CEO providing the following information:
 - 8.4.1.1 Number of units in question
 - 8.4.1.2 Total costs associated with Go Back or Call Back work
 - 8.4.1.3 Date in which the unit(s) was reported to the CEO as complete
 - 8.4.1.4 Description of item to be treated as the Go Back or Call Back
- 8.5 Client File**
 - 8.5.1 Subgrantees are responsible for keeping appropriate backup documentation associated with a Call Back or Go Back in the client file.
 - 8.5.2 After repairs are completed and inspected, the unit and all associated costs are recorded, CEO WAP will resubmit the unit(s) to DOE in the month that the final work was completed. See CEO-WAP-306.
- 9. Re-weatherization Due to “Fire, Flood, or Force Majeure”**
 - 9.1 If the client’s request for a Call Back or Go Back is a result of damage by fire, flood, or force majeure, and repair for the damage to WAP materials is not paid for by insurance:



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9.1.1

The subgrantee must request a waiver from CEO WAP staff to correct the damage to WAP materials using currently available CEO WAP funding at the local level.

9.1.2 A reweatherized unit will not count as new and will not count toward subgrantee unit production minimums.

9.1.3 Cost will be included in per unit averages and material percentage calculations, and charged to the appropriate budget categories of the current grant.



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CEO-WAP-904

Miscellaneous Requirements

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

CEO-WAP: [401](#), [403](#), [502](#), [701](#), [801](#), [802](#), [808](#), [809](#), [902](#);
[OSHA](#); [29 CFR 1910 & 1926](#)

1. Abstract

- 1.1 This policy outlines the additional and general requirements for all subgrantees of Colorado Energy Office Weatherization Assistance Program (CEO WAP) which do not clearly fit into another policy.
- 1.2 At this time all general requirements previously housed within this policy have been relocated into applicable policies.
- 1.3 This policy will continue to exist should it be needed in the future. For now, please use it as reference for where each topic is now located.

2. General Requirements

- 2.1 Weatherization Assistance Database: Moved to CEO-WAP-701
- 2.2 Audit Procedures: Moved to CEO-WAP-801
- 2.3 Quality Control: Moved to CEO-WAP-902
- 2.4 Deferrals: Moved to CEO-WAP-403
- 2.5 Disallowed Structures: Moved to CEO-WAP-401
- 2.6 Clearance and Constraints: Moved to CEO-WAP-802
- 2.7 Anything Health and Safety: Moved to CEO-WAP-802
- 2.8 Inspections: Moved to CEO-WAP-902
- 2.9 All Waivers: Moved to CEO-WAP-502
- 2.10 Solar Photovoltaics: Moved to CEO-WAP-808
- 2.11 Electric Appliances: Moved to CEO-WAP-809



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CEO-WAP- 905

Build America Buy America (BABA)

Effective Date: July 1, 2024

Supersedes: July 2023

Related Documents:

[WAP Memorandum 104 Revised](#), [DOE BABA Background](#)

1. Abstract

1.1 This policy outlines the Build America Buy America (BABA) requirements for the Colorado Energy Office Weatherization Assistance Program (CEO WAP) when DOE funds are/will be used.

2. General Requirements

2.1 Per BABA requirements, most projects typically addressed by WAP will *not* be subject to these requirements. **Only weatherization on *public housing*, or on *privately owned buildings that serve a public function* are required to comply with the BABA requirements.**

Please see [WAP Memorandum 104 Revised](#) for further detail.

2.2 If a subgrantee plans to complete work with DOE funds on public housing or on privately owned buildings that serve a public purpose, they must adhere to all BABA requirements listed in the DOE Memo linked above and receive prior approval from CEO WAP.