



Department of Energy
Washington, DC 20585

WEATHERIZATION PROGRAM NOTICE: 24-8 Revised
DATE ISSUED: September 23, 2024

UPDATE: DOE clarified language under “Weatherization Standards and Energy Audit Procedures” on page 5 to address questions received by the weatherization network.

EXECUTIVE SUMMARY: This guidance, effective immediately, provides updated policy and reporting requirements for U.S. Department of Energy (DOE) Weatherization Assistance Program (WAP) Enhancement and Innovation (E&I) grant recipients. Key updates include:

- Clarification on the applicability of Health and Safety requirements.
- Clarification on the applicability of Energy Audit requirements, including case-by-case reviews of projects.
- Notification of new technical assistance resources available on the Resource Hub.
- Updates to hyperlinks and referenced Weatherization Program Notices (WPNs).

SUBJECT: Weatherization Assistance Program E&I Policy and Reporting

INTENDED AUDIENCE: WAP E&I Grantees, E&I Subgrantees

PURPOSE: Describe applicable E&I policies and reporting requirements for program administration, implementation, and future Grantee monitoring and evaluation.

SUPERSEDES: Weatherization Program Notice 23-5.

SCOPE: The provisions of this Guidance apply to all Grantees awarded financial assistance under DOE WAP E&I grants.

LEGAL AUTHORITY: Title IV, Energy Conservation and Production Act, as amended, authorizes DOE to administer WAP (42 U.S.C. § 6861, *et. seq.*). The E&I Program is authorized by [42 U.S.C. 6861d](#) and is funded by Congress through WAP appropriations. All grant awards made under E&I shall comply with applicable laws and regulations. Although the E&I Program is not included in the [Code of Federal Regulations \(CFR\) Title 10, Chapter II, Subchapter D, Part 440](#), WAP rules apply to E&I. Specific exceptions are included in the Implementation section of this WPN.

BACKGROUND: WAP was created in 1976 to increase the energy efficiency of dwellings owned or occupied by low-income persons. With the advances and evolution of the Program, today WAP aims to provide low-income households with renewable energy systems or technologies while staying true to the original mission of the Program, to reduce the household's total residential expenditures and improve their health and safety, especially low-income persons who are particularly vulnerable such as the elderly, persons with disabilities, and families with children. Within Public Law (P.L.) 116-260, signed December 27, 2020, Congress reauthorized WAP and directed DOE to establish a new competitive program for “WAP Enhancement and Innovation” providing financial assistance to WAP Grantees, Subgrantees, and other non-profit organizations. E&I funding availability is contingent on the total amount of WAP funds appropriated by Congress.

WAP E&I Purpose:

- Expand the number of homes that are weatherization-ready.
- Promote the deployment of renewable energy.
- Ensure healthy indoor environments by enhancing or expanding health and safety measures and resources available.
- Disseminate new methods and best practices among entities providing weatherization assistance.
- Encourage entities providing weatherization assistance to hire and retain employees who are individuals:
 - from the community in which assistance is provided.
 - from communities or groups that are underrepresented in the home energy performance workforce, including religious and ethnic minorities, women, veterans, individuals with disabilities, and individuals who are socioeconomically disadvantaged.

Each round of E&I awards outlines the Program and policy objectives in addition to the E&I purpose, in the Funding Opportunity Announcement (FOA), which DOE may adjust from year to year. E&I Grantees should refer to the applicable FOA to ensure alignment with E&I objectives.

GUIDANCE: E&I Grantees must follow their approved Statement of Project Objectives (SOPO) and the Terms & Conditions of the award. Grantees must notify DOE of any changes to the approved award, including key personnel, recipients, planned performance measures, budgets, etc.

Performance and Accountability for Grants in Energy (PAGE): [PAGE](#) is a DOE cloud-based system that all WAP Grantees are required to use for financial, performance, and quality assurance reporting and monitoring information. Grantees **must use their PAGE account to**

enter the approved budget into the PAGE system. E&I Grantees must upload supporting documents as attachments to the SF-424 section of PAGE. Required supporting documents include the Grantee's SOPO, indirect cost agreements (if applicable), budget justification, subrecipient budget justification(s) (if applicable), single audit statement (if applicable), and pre-award information sheet.

The Terms and Conditions of the award (Budget Changes Term) require E&I Grantees to update information in PAGE and keep points of contact information current to receive notifications throughout the 3-year grant period. Grantees may have questions regarding information posted and reported through PAGE, and should:

- Refer to the Help Menu, contact the PAGE hotline at PAGE-Hotline@ee.doe.gov or 1-866-492-4546.
- Refer to the budget instructions provided by DOE.
- Contact the respective Project Officer (PO) assigned to the Grant for specific questions and/or assistance.

Financial Management and Procurement: As noted in the award Terms and Conditions, E&I Grantees are subject to [2 CFR 200 Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards](#), which establishes uniform policies and procedures for the award and administration of Federal grants and subawards. Of specific note:

- **Indirect Costs and Modified Total Direct Costs (MTDC)** – Non-Federal entities may use either a federally negotiated indirect cost rate or a de minimis rate of 10% of the MTDC, in the absence of a Negotiated Indirect Cost Rate Agreement (NICRA). The E&I Program statute limits all planning, management, and administrative costs to 15% of the total award ([42 U.S.C. 6864d](#)).
- **Procurement Standards** – Non-Federal entities must have documented procurement procedures, consistent with State, local, and Tribal laws and regulations for the acquisition of property or services required under a Federal award or subaward ([2 CFR 200.317-327](#)).
- **Subrecipients and Contracts** – E&I Grantees should refer to [2 CFR 200.331](#) for more information on subrecipient and contractor (also referred to as vendor) determinations, which may vary based on the Grantee Plan. All applicable grant requirements and policy provisions should be included in subrecipient or contractor awards.
- **Vehicles and Equipment** – Grantees must follow the process, including Federal approval of purchases, outlined in [WPN 24-6: Vehicle and Equipment Purchases and Disposition Using Weatherization Assistance Program Funds](#).
- **Cost Principles** – See [2 CFR 200 Subpart E](#) for detailed information on allowable costs with Federal funds.

WAP has created Procurement Resources to assist WAP organizations in meeting the goals of the Program, which are available in the [WAP Resource Hub](#). Procurement Resources provide examples, for illustrative purposes only, for Grantees in purchasing services and/or materials. Required Federal regulations contained in 2 CFR 200 establish procurement standards and each Grantee will have their own set of requirements based on their state laws and agency practices. The Grantee must incorporate how the organization procures goods and/or services. For additional technical assistance, please contact your PO listed on your Award's Assistance Agreement and in PAGE.

IMPLEMENTATION: WAP's aim is to expand the reach of E&I funds and maximize the benefits of the Program with a goal of at least a 2:1 ratio of leveraged resources to DOE awarded funds, which may include Federal funds (non-DOE funds) and/or leveraged non-Federal funding, financial contributions, volunteer labor, in-kind donations, and other resources provided by partner organizations.

The E&I authorizing statute permits recipients of E&I funds to use those funds in conjunction with standard weatherization funds received via WAP. For example, providers with E&I funds may make a particular dwelling weatherization-ready, followed by utilization of the annual or Bipartisan Infrastructure Law (BIL) weatherization funds to implement weatherization measures in the same dwelling. Recipient concerns or questions regarding the braiding of E&I funds with annual or BIL funds, may be answered in [WPN 22-9: Managing Multiple Funding Streams within the Weatherization Assistance Program](#) or by contacting their PO.

E&I Grantees must follow their approved SOPO and certain applicable WAP regulations, including compliance with applicable Federal statutes and rules, not limited to [42 USC 6864](#) and [2 CFR 200](#). Although the E&I statute has not been codified in [10 CFR 440](#), WAP rules apply with some exceptions as outlined in the E&I FOA, including:

- **Average Cost Per Unit (ACPU):** E&I funds are **not subject to WAP** ACPU requirements.
- **Reweathering:** All work performed in homes using E&I awarded funds is **not** subject to the 15-year "reweathering" requirement outlined in Section 1011(h) of the Energy Act of 2020. Dwelling units previously weatherized by WAP, U.S. Department of Health and Human Services (HHS) Low-Income Home Energy Assistance Program (LIHEAP), U.S. Department of Housing and Urban Development (HUD), or U.S. Department of Agriculture (USDA) are eligible for E&I-related activities.
- **Savings-to-Investment Ratio (SIR):** E&I measures are **not** subject to SIR requirements; however, inclusion of E&I funds does not absolve other funding sources from following their own requirements (e.g., all funds from DOE annual and BIL formula awards remain subject to SIR requirements, LIHEAP funds must follow the LIHEAP state plan and policies, etc.) in the installation of measures. While E&I funded measures do not require an SIR of 1.0 or greater, Grantees should include components outlined in the Technical

Description of the award application outlining the methods for estimating and measuring non-energy impacts and community benefits.

- **Health and Safety (H&S):** E&I funds used for health and safety measures are **not** subject to the cost restrictions outlined in WAP annual formula-funded program ([WPN 22-7](#)).

The following guidelines are applicable to E&I projects. WAP policies and procedures are referenced, where appropriate.

- **Administrative Costs:** As noted in the FOA and per [42 USC 6864d\(b\)\(8\)](#), up to 15% of the E&I award may be used for planning, management, and administration.
- **Ensuring Priority of Service ([10 CFR 440.16\(b\)](#)):** In selecting projects, E&I Grantees must ensure WAP priority categories are included in the selection criteria of recipients. Consideration of “high residential energy users” and “households with a high energy burden” (as defined in [10 CFR 440.3](#)) may be in combination with other priority categories of elderly, persons with disabilities, or families with children. (Additional information and resources can be found in [Weatherization Memorandum 094: Reminder of Client Priority – High Energy Burden in Weatherization Assistance Program](#).)
 - One objective of WAP E&I is to deliver at least 40% of investments and benefits to disadvantaged communities. The following resources may assist E&I Grantees in efforts to target disadvantaged communities – DOE’s [Justice40 Initiative](#), the [Energy Justice Mapping Tool - Disadvantaged Communities Reporter](#), and the [Climate & Economic Justice Screening Tool \(CEJST\)](#).
- **Weatherization Standards and Energy Audit Procedures:**
 - Prior to commencement of E&I field work, all energy conservation measures (ECMs) planned for installation with E&I funds must be modeled with a DOE approved energy audit tool or priority list. When feasible, all planned work including E&I and DOE WAP-funded measures shall be included in the energy audit model and scope of work assessment to analyze cost saving potential. DOE may request to review audits on a case-by-case basis depending on the E&I project scope and planned activities (e.g., fuel-switching of HVAC systems or hot water heaters, and activities that could potentially increase household energy burden).
 - E&I-funded completions must also receive a whole-house energy efficiency retrofit aligned with WAP rules and guidance. The retrofit may occur prior to, concurrent with, or as soon as possible after the E&I investment, depending on the project plan.
 - This whole-house energy efficiency retrofit must meet annual or BIL requirements related to cost-effectiveness (excluding E&I measures) and use of a DOE-approved energy audit tool or priority list. For additional details see the most recent energy auditing and priority list guidance outlined in [WPN 23-6: Revised Energy Audit Approval Procedures](#),

Related Audit, and Material Approvals and [WPN 22-8: Streamlining the Energy Audit Process—Optional Regional Weatherization Priority Lists](#).

- All work performed in homes using WAP E&I and WAP formula awarded funds must align with the [Standard Work Specifications](#) (SWS) or a DOE-approved Field Guide, and applicable State and local codes.
- **Health and Safety:** The following requirements from [WPN 22-7](#) and related attachments apply to E&I projects:
 - Workers must follow, and Grantees must verify compliance with, all applicable safety standards (Occupational Health and Safety Administration (OSHA), U.S. Environmental Protection Agency (EPA), etc.) and adhere to all worker safety regulations in the local jurisdiction where required.
 - Grantees must provide and sign a notification to occupants (and landlord if applicable) informing occupants of and confirming an understanding of their rights and options. Required topics include (see [WPN 22-7](#) for additional information):
 - Occupant pre-existing or potential health screening.
 - Hazard identification notification.
 - Radon informed consent.
 - Grantees must follow all “*Required*” guidance in the WPN 22-7 [Table of Issues](#). Contact your PO with questions about the applicability of the Table of Issues guidance to your E&I project.
- **Performing Final Inspections ([10 CFR 440.16\(g\)](#)):** E&I Grantees are responsible for inspections on 100% of completed E&I work. Trained Final Inspectors must have applicable state/local credentialing. DOE strongly recommends but does not require Home Energy Professional (HEP) Quality Control Inspector (QCI) certification.
 - A unit is not complete until the E&I Grantee, or authorized representatives, has performed a final inspection to ensure compliance and quality of installation. Every client file must have a form that certifies that the unit had a final inspection and that all work met the required standards. The E&I Grantee must maintain these Records and have the Records available at the request of DOE.
 - The same individual who completes the WAP annual or BIL final inspection may complete the WAP E&I final inspection. DOE encourages streamlining processes and minimizing trips to client homes when feasible. However, depending on the sequence of E&I project plans, it is allowable to complete an inspection of E&I work independent of (prior to or after) the WAP Final Inspection. Grantees should consult with their PO on project-specific questions related to final inspections.
- **Client Eligibility and WAP Subgrantee Coordination:** Grantees must verify client eligibility according to the policies and procedures described in an approved WAP Grantee Plan. E&I Grantees shall work with the relevant state weatherization agency to

ensure compliance with WAP Grantee policies and procedures. E&I Grantees, if qualifying clients directly, should be aware of the following related guidance documents:

- **Income Eligibility:** [WPN 24-3](#), *Federal Poverty Guidelines and Definition of Income* includes current income eligibility. Grantees should use these income levels in the Program from the effective date of this Guidance until updated in subsequent policy documents. Poverty income guidelines will be updated annually on the [WAP website](#).
- **Categorical Eligibility:** [WPN 22-5](#), *Expansion of Client Eligibility in the Weatherization Assistance Program*. In addition to eligibility outlined in [WPN 22-3](#), WAP includes provisions to allow categorical approval for applicants eligible for HHS LIHEAP, HUD means-tested programs, and USDA buildings as outlined in [WAP Memo 099](#).
- **Client Release:** E&I Grantee must confirm a signed client release prior to sharing any sensitive information.
- **Building Eligibility:** E&I Grantees shall comply with the following policies related to building eligibility requirements:
 - **Dwelling Unit:** A unit means a house, including a stationary manufactured home, an apartment, a group of rooms, or a single room occupied as separate living quarters ([10 CFR 440.3](#)).
 - **Single Family Buildings:** Rental or owner-occupied buildings with 1 to 4 units.
 - In 2-to-4-unit buildings, at least 50% of the dwelling units must be occupied by income-eligible households. The units are reported in the “2-4 Units” category on the reporting form.
 - **Multifamily Weatherization:** Multifamily buildings are defined as rental or owner-occupied buildings with 5 or more units. DOE policy allows for treatment of the full building as long as 66% of the units are occupied by income-eligible households. Certain types of large multifamily buildings may be eligible if 50% of the households are income eligible. For additional details on multifamily building eligibility see [WPN 22-12: Multifamily Weatherization](#) and Grantees should consult with their PO.
 - **Renter-Occupied Units:** The E&I Grantee must establish procedures for renter-occupied units to ensure that the benefits of weatherization accrue primarily to the low-income households occupying the building, protect against displacement of low-income households, and require the building owner or representative to sign a detailed work agreement prior to installation of any WAP or E&I measures. For additional information see [WPN 22-13: Weatherization of Rental Units](#).
- **Davis Bacon Act (DBA):** DBA applies to work performed on multifamily buildings with not fewer than 5 units using BIL funding. DOE has procured LCPtracker software to assist in streamlining DBA compliance. All BIL-funded E&I projects must use this system to comply with DBA requirements. See [WPN BIL-6: Applicability of Davis-Bacon Act](#)

Prevailing Wage Requirements to WAP BIL - REVISED for additional information and requirements.

- **Build America, Buy America (BABA):** All E&I projects are subject to BABA requirements; however, only weatherization on public housing, or privately owned buildings that serve a public function, must comply with BABA requirements. Absent a site-specific waiver, DOE-funded projects should ensure BABA requirements flow down to all sub-awards, contracts, subcontracts, and purchase orders for articles, materials, and supplies. See [WAP Memorandum 104: Weatherization Assistance Program "Build America, Buy America" Requirement - REVISED](#) for additional information and requirements.
- **Training and Technical Assistance:** E&I Grantees shall train individuals to implement E&I services in accordance with all applicable Federal rules and DOE procedures. Training shall align with WAP installation standards and Program requirements (e.g., SWS, Energy Audit Procedures). For additional details see [WPN 22-4: Quality Work Plan Requirement Update](#).
 - Training shall follow the [Guidelines for Home Energy Professionals](#) or other industry standards such as registered apprenticeships.
 - Coordinating with an accredited training provider is optional for E&I training but preferred. Grantees must follow project plans and notify DOE of any changes in training providers.
 - Accredited training providers can be found utilizing the following link: [Credential Holder Registry - Interstate Renewable Energy Council \(IREC\) \(irecusa.org\)](#)
- **DOE Monitoring:** DOE performs desktop reviews and onsite visits. Per the FOA requirements, DOE's authorized representatives must review project accomplishments and management control systems and, if needed, provide technical assistance. DOE will perform monitoring in a manner that does not unduly interfere with or delay the work. Please see [WPN 23-9: Weatherization Assistance Program Enhancement and Innovation Monitoring](#) including an onsite monitoring checklist.
 - **E&I Grantee Monitoring of Subrecipients:** Grantees are responsible for quality assurance and oversight of subrecipients and contractors. Grantees must assure compliance with applicable laws and rules, quality workmanship, appropriate assignment of work, and tracking of financial resources.
- **Evaluation:** DOE will require E&I Grantees to participate in DOE-funded E&I evaluations to assess project outcomes, community benefits, and inform the future design and management of both E&I grants and WAP. DOE will provide detailed plans surrounding the studies/assessments in future communications with the E&I Grantees.
 - DOE encourages E&I Grantees and Subgrantees to participate in evaluations/studies related to weatherization programs. While national-level studies allow DOE to see macro elements, Grantee participation in regional, state,

or local evaluations/studies, provides more clarity on the impact specific protocols have on the energy savings and other benefits garnered through WAP. DOE urges Grantees to establish a protocol for participation in an evaluation or study.

Grantee policies should include information about the purpose of the study and ensure privacy of recipients. Information requests range from informal inquiries by local elected officials and other community leaders to requests for specific information about recipients from local and regional press outlets. If a Grantee receives a data or evaluation request from an organization other than the DOE WAP, the Grantee must notify the PO prior to participation.

- **Record Retention and Client Files:** Record retention requirements are outlined in the Terms and Conditions of the E&I award and in [2 CFR 200.334](#). Grantees reporting completed E&I units shall keep a file for each client or building with all applicable records and make files available to DOE on request. An optional client file checklist template is available on the [WAP Resource Hub](#). Grantees must have a system in place to safeguard protected personally identifiable information (PII) and other sensitive information in records and client files, which includes redacting PII from documents when sharing client files with DOE ([2 CFR 200.303](#) Internal Controls). Information related to an individual's eligibility and participation in WAP, such as name, address, social security number, and other identification or income information must be confidential.
- **Grant Reporting:** DOE required E&I Grantees to submit reports through PAGE, on time, in accordance with the Terms and Conditions of the grant. Technical assistance with grant reporting is available via your PO.
 - **E&I Quarterly Program Report (QPR):** The QPR captures outlays, production, and performance measures. DOE requires E&I Grantees to report total outlays and production, and the outlays and production in disadvantaged communities (DAC) based on the DAC definition in the approved SOPO. E&I Grantees should review the QPR instructions carefully prior to PAGE submission to ensure timely acceptance.
 - Final inspections of E&I measures must be complete prior reporting E&I units to DOE.
 - Reporting units braided with E&I funds and annual or BIL funds must be in both the WAP QPR and E&I QPR following completion of each project type. Reporting unit completions in the same quarter or program year is not necessary.
 - E&I Grantees without production in their work plans (e.g., workforce development) will leave the production portion of QPR blank.
 - **E&I Annual Report:** The Annual Report encompasses activities completed during the previous year, including successes, challenges, lessons learned, SOPO tasks and milestones, training & technical assistance, monitoring, leveraged

funds, Diversity, Equity, and Inclusion, and Justice⁴⁰. Grantees should review the Annual Report instructions carefully to ensure timely acceptance.

- **National Environmental Policy Act (NEPA) and Historic Preservation Reporting:** Grantees are required to complete an Annual Historic Preservation Report. In addition, some E&I grants will require quarterly NEPA logs. See E&I award Terms and Conditions for details. General information is available on the NEPA site [here](#). DOE will provide additional training and technical assistance.

DOE will publish additional guidance for closeout of the E&I grants and final reports, during the final year of the grant period.

CONCLUSION: In addition to creating new opportunity for enhancing benefits realized in disadvantaged communities, the E&I grants will also evaluate varying approaches, aiming to identify where DOE can continue to improve and explore additional flexibilities that would benefit the national WAP.

WAP has evolved and continuously improved over the years; however, “...to aid those persons least able to afford higher utility costs and to conserve needed energy.” remains constant since the inception of the Program in WAP’s enabling statutory language. Thank you for contributing to this purpose. DOE looks forward to continuing to work with the WAP E&I Grantees.

DAVID
GIPSON

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GIPSON
Date: 2024.09.23
16:18:23 -04'00'

David Gipson
Deputy Director
Office of State and Community Energy Programs