

APPLICATION FOR FEDERAL ASSISTANCE SF-424

Version 02

1. Type of Submission:

- ☐ Preapplication
- ☒ Application
- ☐ Changed/Corrected Application

2. Type of Application:

- ☒ New
- ☐ Continuation
- ☐ Revision

If Revision, select appropriate letter(s)

Other (specify):

3. Date Received

07/01/2021

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

DE-SE0001857

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

a. Legal Name: Virginia, Commonwealth of

b. Employer/Taxpayer Identification Number (EIN/TIN):
541083047c. UEI:
Q85SYD73U1A5

d. Address:

Street 1: 600 East Main St., Ste. 300

Street 2:

City: Richmond

County: RICHMOND City

State: VA

Province:

Country: U.S.A.

Zip / Postal Code: 232192430

e. Organizational Unit:

Department Name:

Dept. of Housing & Com Dev

Division Name:

Division of Housing

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Mr First Name: Tim

Middle Name:

Last Name: Pettit

Suffix:

Title: Associate Director of Energy Efficiency

Organizational Affiliation:

Telephone Number: 8045847407

Fax Number:

Email: Tim.Pettit@dhcd.virginia.gov

APPLICATION FOR FEDERAL ASSISTANCE SF-424

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9. Type of Applicant:

A State Government

10. Name of Federal Agency:

U. S. Department of Energy

11. Catalog of Federal Domestic Assistance Number:

81.042

CFDA Title:

Weatherization Assistance Program

12. Funding Opportunity Number:

DE-WAP-0002025

Title:

2025 Weatherization Assistance Program (WAP) Funding

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Commonwealth of Virginia

15. Descriptive Title of Applicant's Project:

PY2025 DOE WAP Funding

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16. Congressional District Of:

a. Applicant: Virginia Congressional District 03

b. Program/Project: VA-Statewide

Attach an additional list of Program/Project Congressional Districts if needed:

17. Proposed Project:

a. Start Date: 07/01/2025

b. End Date: 06/30/2026

18. Estimated Funding (\$):

a. Federal	6,803,840.00
b. Applicant	0.00
c. State	0.00
d. Local	0.00
e. Other	0.00
f. Program Income	0.00
g. TOTAL	6,803,840.00

19. Is Application subject to Review By State Under Executive Order 12372 Process?:

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372

20. Is the applicant Delinquent On Any Federal Debt? (If "Yes", provide explanation)

No

21. By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to

☒ I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency

Authorized Representative:

Prefix: Mr First Name: Tim

Middle Name:

Last Name: Pettit

Suffix:

Title: Associate Director of Energy Efficiency

Telephone Number: 8045847407

Fax Number:

Email: Tim.Pettit@dhcd.virginia.gov

Signature of Authorized Representative: Signed Electronically

Date Signed: 09/26/2025

Authorized for Local Reproduction

Standard Form 424 (Revised 10/2005)
Prescribed by OMB Circular A-102

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. SE0001857		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address Virginia, Commonwealth of 600 East Main St., Ste. 300 Richmond, VA 232192430		4. Program/Project Start Date 07/01/2025	5. Completion Date 06/30/2026

SECTION A - BUDGET SUMMARY

Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. Federal	81.042	\$ 0.00		\$ 6,803,840.00		\$ 6,803,840.00
2.						
3.						
4.						
5. TOTAL		\$ 0.00	\$ 0.00	\$ 6,803,840.00	\$ 0.00	\$ 6,803,840.00

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) GRANTEE ADMINISTRATI ON	(2) SUBGRANTEE ADMINISTRATI ON	(3) GRANTEE T&TA	(4) PROGRAM OPERATIONS	
a. Personnel	\$ 167,800.00	\$ 0.00	\$ 138,000.00	\$ 0.00	\$ 305,800.00
b. Fringe Benefits	\$ 49,333.00	\$ 0.00	\$ 40,572.00	\$ 0.00	\$ 89,905.00
c. Travel	\$ 0.00	\$ 0.00	\$ 75,138.00	\$ 0.00	\$ 75,138.00
d. Equipment	\$ 83,304.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 83,304.00
e. Supplies	\$ 8,980.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 8,980.00
f. Contract	\$ 109,756.00	\$ 510,288.00	\$ 607,596.00	\$ 2,656,980.00	\$ 6,074,664.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
i. Total Direct Charges	\$ 419,173.00	\$ 510,288.00	\$ 861,306.00	\$ 2,656,980.00	\$ 6,637,791.00
j. Indirect Costs	\$ 91,115.00	\$ 0.00	\$ 74,934.00	\$ 0.00	\$ 166,049.00
k. Totals	\$ 510,288.00	\$ 510,288.00	\$ 936,240.00	\$ 2,656,980.00	\$ 6,803,840.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. SE0001857		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address Virginia, Commonwealth of 600 East Main St., Ste. 300 Richmond, VA 232192430		4. Program/Project Start Date 07/01/2025	
		5. Completion Date 06/30/2026	

SECTION A - BUDGET SUMMARY						
Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1.						
2.						
3.						
4.						
5. TOTAL		\$ 0.00	\$ 0.00	\$ 6,803,840.00	\$ 0.00	\$ 6,803,840.00

SECTION B - BUDGET CATEGORIES					
6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) HEALTH AND SAFETY	(2) LIABILITY INSURANCE	(3) FINANCIAL AUDITS	(4) WEATHERIZATI ON READINESS	
a. Personnel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 305,800.00
b. Fringe Benefits	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 89,905.00
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 75,138.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 83,304.00
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 8,980.00
f. Contract	\$ 398,292.00	\$ 30,500.00	\$ 25,501.00	\$ 564,345.00	\$ 6,074,664.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
i. Total Direct Charges	\$ 398,292.00	\$ 30,500.00	\$ 25,501.00	\$ 564,345.00	\$ 6,637,791.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 166,049.00
k. Totals	\$ 398,292.00	\$ 30,500.00	\$ 25,501.00	\$ 564,345.00	\$ 6,803,840.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. SE0001857		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address Virginia, Commonwealth of 600 East Main St., Ste. 300 Richmond, VA 232192430		4. Program/Project Start Date 07/01/2025	
		5. Completion Date 06/30/2026	

SECTION A - BUDGET SUMMARY

Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1.						
2.						
3.						
4.						
5. TOTAL		\$ 0.00	\$ 0.00	\$ 6,803,840.00	\$ 0.00	\$ 6,803,840.00

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) SUBGRANTEE T&TA	(2) ENERGY AUDITS	(3) CLIENT ELIGIBILITY/ INTAKE	(4) FINAL INSPECTION	
a. Personnel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 305,800.00
b. Fringe Benefits	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 89,905.00
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 75,138.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 83,304.00
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 8,980.00
f. Contract	\$ 152,546.00	\$ 445,928.00	\$ 257,819.00	\$ 315,113.00	\$ 6,074,664.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
i. Total Direct Charges	\$ 152,546.00	\$ 445,928.00	\$ 257,819.00	\$ 315,113.00	\$ 6,637,791.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 166,049.00
k. Totals	\$ 152,546.00	\$ 445,928.00	\$ 257,819.00	\$ 315,113.00	\$ 6,803,840.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

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Weatherization Assistance Program (WAP)
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Grant Number: SE0001857, **State:** VA, **Program Year:** 2025
Recipient: Virginia, Commonwealth of

IV.1 Subgrantees

Subgrantee (City)	Planned Funds/Units
Appalachian Community Action Agency (Gate City)	\$174,380.70 10
Bay Aging (Urbanna)	\$216,971.13 15
Central VA AAA (Lynchburg)	\$147,326.09 11
Clinch Valley Community Action (North Tazewell)	\$107,146.24 6
Community Housing Partners Corp. (Christiansburg)	\$2,157,255.60 132
Lynchburg Community Action Group (Lynchburg)	\$115,182.21 7
Mountain Community Action Program (Marion)	\$120,539.36 8
PEOPLE, Inc. (Abingdon)	\$121,343.11 8
Pittsylvania County Community Action Agency (Chatham)	\$155,897.76 9
Project: HOMES (Richmond)	\$1,395,311.92 68
Rooftop of Virginia Community Action Program (Galax)	\$80,895.41 5
Support to Eliminate Poverty (Rocky Mount)	\$104,467.59 8
Total Action Against Poverty (Roanoke)	\$342,734.03 21
Tri-County Community Action (South Boston)	\$117,860.85 4
Total:	\$5,357,312.00 312

IV.2 WAP Production Schedule

Weatherization Plans		Units
Total Units (excluding reweatherized)		312
Rewaterized Units		0
Average Unit Costs, Units subject to DOE Project Rules		
VEHICLE & EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)		
A	Total Vehicles & Equipment (\$5,000 or more) Budget	\$0.00
B	Total Units Weatherized	312
C	Total Units Reweatherized	0
D	Total Dwelling Units to be Weatherized and Reweatherized (B + C)	312
E	Average Vehicles & Equipment Acquisition Cost per Unit (A divided by D)	\$0.00
AVERAGE COST PER DWELLING UNIT (DOE RULES)		

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F	Total Funds for Program Operations	\$2,656,980.00
G	Total Dwelling Units to be Weatherized and Reweatherized (from line D)	312
H	Average Program Operations Costs per Unit (F divided by G)	\$8,515.96
I	Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$0.00
J	Total Average Cost per Dwelling (H plus I)	\$8,515.96

IV.3 Energy Savings

Method used to calculate savings: ☒ WAP algorithm ☐ Other (describe below)				
		Units	Savings Calculator (MBtus)	Energy Savings
	This Year Estimate	312	29.3	9142
	Prior Year Estimate	366	29.3	10724
	Prior Year Actual	614	29.3	17990
Method used to calculate savings description:				

IV.4 DOE-Funded Leveraging Activities

No leveraging funds are planned for this year.
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IV.5 Policy Advisory Council Members

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

Chase Counts	Type of organization: Non-profit (not a financial institution) Contact Name: Chase Counts Phone: 5405054163 Email: aecp@swva.net
Chelsea Hamish	Type of organization: Non-profit (not a financial institution) Contact Name: Phone: 8044648233 Email: info@vaecc.org
Denise Surber	Type of organization: Unit of State Government Contact Name: Denise Surber Phone: 8047267368 Email: Denise.T.Surber@dss.virginia.gov
Erik Johnston	Type of organization: Non-profit (not a financial institution) Contact Name: Erik Johnston Phone: 8046440417 Email: ejohnston@vacap.org
Kathy Miller	Type of organization: Unit of State Government Contact Name: Phone: 8046629341 Email: kathy.miller@dars.virginia.gov
Kelley Marlowe	Type of organization: Utility Contact Name: Kelley Marlowe Phone: 8009564237 Email: kbmarlowe@aep.com
Malesia Taylor	Type of organization: Utility Contact Name: Phone: 8047714406 Email: malesia.a.taylor@dominionenergy.com
Rebecca Glidden	Type of organization: Utility Contact Name: Phone: 8047773077

U.S. Department of Energy
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	Email: cdix@nisource.com
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IV.6 State Plan Hearings (Note: attach notes and transcripts to the SF-424)

Date Held	Newspapers that publicized the hearings and the dates the notice ran
04/08/2025	Bristol Herald Courier (3/29/25) Danville Register & Bee (3/29/25); Fredericksburg Freelance-Star (3/28/25); Richmond Times Dispatch (3/29/25); Roanoke Times (3/28/25);

IV.7 Miscellaneous

Principal Investigator

Sandra Powell
600 East Main Street
Ste 300
Richmond, VA 23219
804-613-8769 Phone
sandra.powell@dhcd.virginia.gov

Business Officer

Tim Pettit
600 East Main Street
Ste 300
Richmond, VA 23219
804-584-7407 Phone
tim.pettit@dhcd.virginia.gov

PAC Member Information:

Denise Surber : Department of Social Services - services low income Virginians and manages Crisis Heating and Cooling programs

Chase Counts: AECF – Association of Energy Conservation Professionals – represents Weatherization and other energy conservation professionals

Chelsea Harnish: VAECC – the Virginia Energy Efficiency Council – a group of businesses, nonprofits, and local governments sharing an energy efficiency goal

Erik Johnson: VACAP – The Virginia Care in Action Partnership. Represents the CAP agencies in the Weatherization network

Kathy Miller: DARS – The Virginia Department for Aging and Rehabilitative Services – represents the elderly and disabled interests

Malesia Taylor: Dominion – The largest energy provider in Virginia. This person represents their weatherization program

Rebecca Glidden: Columbia Gas – the largest gas energy provider in Virginia

Kelley Marlowe: AEP – the second largest energy provider in Virginia. This person represents their weatherization program

WRF Plan

Purpose:

This plan defines the use, expectations, invoicing, reporting, and monitoring procedures for the Weatherization Readiness Fund. Guidelines are in accordance with latest DOE Program notices below.

Background:

The U.S. Department of Energy [WPN 23-4](#) outlines that WRF funding was created to address structural and health and safety (H&S) issues not covered in Virginia's DOE approved WAP State Plan (Section V.7) of homes at risk for deferral. These funds are specifically targeting measures outside of the regular Weatherization scope of work. This is to reduce the frequency of deferred homes. These repairs are to be completed before or in conjunction with weatherization. Prioritization will be given to previously deferred units and units with elderly, disabled, households with children, high energy use and high energy burdened households.

Funds will be distributed based on the same formula for distribution of WAP annual funds. Agencies will receive the percentage of funds that match the percentage of the state they cover for WAP annual funds.

Allowable Measures:

WRF funding may be used in the following ways before Wx on a unit begins:

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Weatherization Assistance Program (WAP)
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- Roof repair (<100 sqft) and replacement
- Wall repair (interior and exterior)
- Ceiling repair
- Floor repair
- Foundation and subspace repair
- Exterior drainage repair (e.g., landscaping and gutters)
- Plumbing repairs
- Electrical repairs
- Remediation beyond typical scope of WAP including:

- o Lead paint remediation

- o Asbestos remediation (confirmed or suspected, including vermiculite)

- Mold and moisture remediation

Measures other than what is listed above may be installed with WRF funds but may be subjected to further National Environmental Policy Act (NEPA) review.

When selecting a WRF measure the measure comment must contain clarifying comments explaining why these repairs are required to eliminate the deferral in order to weatherize the home.

WRF funding rules

- DOE WPN 23-4 allows the flexibility to spend WRF across different program years but within the same DOE 3-year grant cycle. However, VA DHCD expects all WRF funds to be expended in the same program year they are awarded. Exceptions to this may be considered on a case-by-case basis where there is a strong reason and if we are able to grant an extension.
- WRF funds can be utilized in conjunction with any other funding source but **MUST** result in a DOE completion. DOE completion can either be the annual awarded funds or the IJA funds.
- WRF will have an Average Cost Per Unit of \$15,000 effective for all Program Years of allocation.

Reporting WRF and Invoicing WRF in Hancock:

- WRF is created as a separate fund in Hancock for all sub-grantees. Allowable measures are in Hancock for reporting purposes. See the attached PDF for specific guidance on how WRF measure are to be modeled in the Hancock Energy Audit Tool (HEAT).
- WRF expenses can be invoiced in Hancock prior to the DOE formula funds being submitted but still must result in a DOE completion from the same program year.
- The WRF invoice should only be for the WRF Program Operations and WRF Admin expenses. WRF expenses should be submitted in a separate invoice from the DOE formula fund expenses.
WRF invoices should be submitted in Hancock the same way that all other DOE and LIHEAP invoices are submitted. A job must be attached, and financial supporting documentation must be uploaded with the invoice that matches the Hancock invoice request.
- WRF invoices must be dated on or before DOE or IJA invoices.

Important Reminders:

- The funding is to be used to help prevent a potential weatherization project from deferral or to move a deferred project into weatherization by mitigating measures typically outside the scope of WAP.
- Measures funded by WRF must be installed **BEFORE** or in conjunction with DOE funded measures.
- WRF can be leveraged with other funding sources outside of DOE.
- VA DHCD expects all WRF funds to be expended in the same program year it is awarded. Exceptions to this may be considered on a case-by-case basis when and if we are able to grant an extension. The use of WRF funds must result in the completion of a DOE weatherization unit.
- Hancock reporting includes all listed measures and invoicing mechanism.

Build America/ Buy America (BABA)

The Department of Housing and Community Development will comply with all requirements of Memorandum 104 as apart of the Infrastructure Investment and Jobs Act.

In accordance with the guidance provided by OMB the Buy America Requirement is applicable to Non-Federal Entity prime recipients that are States, Local Governments, Indian Tribes, Territories, Institutions of Higher Education (IHEs), and Non-Profit Organizations. For-Profit Entities are not included in the definition of Non-Federal Entity when applying the statutory Buy America Requirement to prime recipients of Federal awards. Also, Tribal Consultation is required prior to applying the Buy America Requirement to Indian Tribe prime recipients.

However, the Buy America Requirement is applicable to a For-Profit Entity if: (1) it is a sub-recipient or sub-awardee under an award that contains the Buy America Requirement term and condition, or (2) it is the prime recipient that voluntarily chooses to use domestically sourced iron, steel, manufactured products, and constructions materials by stating so in its proposed application containing an infrastructure project. If the For-Profit Entity specifically states that it will comply with the Buy America Requirement in its application and it is selected for award, its award will contain a Buy America Requirement term and condition.

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Grant Number: SE0001857, State: VA, Program Year: 2025
Recipient: Virginia, Commonwealth of

The prime recipient is responsible for flowing the Buy America Requirement down to all sub-awards, all contracts, subcontracts, and purchase orders for work performed under the proposed infrastructure project, including to For-Profit Entities when the For-Profit Entity is a sub-recipient or sub-awardee. DOE prime recipients of awards containing the Buy America Requirement must ensure that absent a waiver none of the funds provided under their award (federal share or recipient cost-share) may be used for a project for infrastructure unless:

1. All iron and steel used in the project is produced in the United States—this means all manufacturing processes, from the initial melting stage through the application of coatings, occurred in the United States;
2. All manufactured products used in the project are produced in the United States—this means the manufactured product was manufactured in the United States; and the cost of the components of the manufactured product that are mined, produced, or manufactured in the United States is greater than 55 percent of the total cost of all components of the manufactured product, unless another standard for determining the minimum amount of domestic content of the manufactured product has been established under applicable law or regulation. The costs of components of a manufactured product are determined in accordance with 2 CFR 184.5; and
3. All construction materials are manufactured in the United States—this means that all manufacturing processes for the construction material occurred in the United States. See 2 CFR 184.6 for the meaning of “all manufacturing processes” for specific construction materials.

The Buy America Requirement only applies to articles, materials, and supplies that are consumed in, incorporated into, or permanently affixed to an infrastructure project. As such, it does not apply to tools, equipment, and supplies, such as temporary scaffolding, brought into the construction site and removed at or before the completion of the infrastructure project. Nor does a Buy America Requirement apply to equipment and furnishings, such as movable chairs, desks, and portable computer equipment, that are used at or within the finished infrastructure project but are not an integral part of the structure or permanently affixed to the infrastructure project.

This requirement must flow down to all sub-awards, all contracts, subcontracts and purchase orders for work performed under the infrastructure project.

Prime recipients must maintain certifications or equivalent documentation for proof of compliance that those articles, materials, and supplies that are consumed in, incorporated into, affixed to, or otherwise used in the infrastructure project, not covered by a DOE waiver or exemption, are produced in the United States. The certification or proof of compliance must be provided by the suppliers or manufacturers of the iron, steel, manufactured products and construction materials and flow up from all sub-awardees, contractors and vendors to the prime recipient. Prime Recipients must keep these certifications with the award/project files and be able to produce them upon request from DOE, auditors or Office of Inspector General.

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Weatherization Assistance Program (WAP)
STATE PLAN / MASTER FILE WORKSHEET
Grant Number: SE0001857, **State:** VA, **Program Year:** 2025
Recipient: Virginia, Commonwealth of

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

V.1 Eligibility

V.1.1 Approach to Determining Client Eligibility

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

In order for a dwelling unit to be eligible for weatherization services, the family unit must meet the income eligibility requirements as defined in 10 CFR 440.22. Virg of the Poverty Level, whichever is greater.

In WPN 24-3 - income eligibility was expanded to include U.S. Department of Housing and Urban Development's (HUD) means-tested programs' income qualific Block Grants (CDBG), HOME Investment Partnerships Program (HOME), Lead Hazard Control & Healthy Homes Program(OLHCHH), etc).

WPN 24-5 - inclusion of USDA properties. After consultation with the Secretary of Agriculture and the Director of the Community Services Block Grant Program categorical income eligibility to USDA means-tested low-income programs of 80% AMI or below.

DOE believes categorical income eligibility is essential to expand the program's reach and simplify the application and verification process for low-income household programs. Eligible programs are those that USDA accepts for households with 80 percent AMI or below, depending on specific program parameters. WAP Grantee eligible for weatherization services through programs including, but not limited to:

- Section 521 Rental Assistance
- Section 502 Direct Home Purchase Program
- Section 533 Housing Preservation Grant Program
- Section 504 Home Repair Program

WAP already has a provision, codified in 10 CFR 440.22(a)(3), to allow inclusion of households that are income eligible for the U.S. Department of Health and Human Services (HHS) categorical eligibility for HUD means-tested programs would be similar to existing eligibility that DOE WAP currently has with Health and Human Services (HHS) L

Income eligibility of applicants for weatherization assistance is determined and verified by the subgrantees and is subject to examination by officials of the Virginia De

Additionally, Income is determined in accordance with DOE program guidance on definition of income. The State provides subgrantees with an operations manual on eligibility for weatherization assistance. Individual subgrantees may expand application forms (for example to accommodate other types of assistance available through must include all the items required by the State.

All applicants are required to identify the amount and source of income for their household. In addition, they have to indicate whether they rent or own their home on application to give authorization for the work. Falsification of an application is subject to prosecution.

When one or more persons residing in the unit receive assistance under Title IV or XVI of the Social Security Act during the preceding twelve month period, categorical Act of 1981, where 60% of state median income is at least 200% of the federal poverty level.

Income eligibility must be recertified after 12 months.

Client eligibility is more fully described in Chapter 1 of the Virginia WAP Program Operations Manual (attachment).

Describe what household eligibility basis will be used in the Program

In order for a dwelling unit to be eligible for weatherization services, the family unit must meet the income eligibility requirements as defined in 10 CFR 440.22. Virg of the Poverty Poverty Guidelines, whichever is greater.

Currently, sixty percent (60%) of SMI is higher for households of 7 or less. For households of 8 or more, 200% of poverty guidelines is greater. Additionally, beginn

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programs accept households using percentages of Area Median Income (AMI) ranging from 30% AMI to 80% AMI, depending on specific program parameters. In counties. The effort explored the overlap in incomes of the different households served through the various programs. The overlap is sufficient to consider "categorical eligibility requirements of another agency's identified program. Additionally, in WPN 25-4 USDA properties became part of the "categorical eligibility." WAP Grants are eligible for weatherization services through programs including, but not limited to: • Section 521 Rental Assistance • Section 502 Direct Home Purchase Program

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

Virginia will follow the policies outlined in the Summary of Immigrant Eligibility Restrictions Under Current Law as of 2/25/2009 in the U.S. Department of Health and Human Services' eligibility of qualified and nonqualified aliens.

Non-citizens, who fail to meet one or more of these criteria, are not eligible to receive Weatherization services.

Applicants denied services for any reason must receive clear written notification that their application for assistance has been denied and the reasons for their denial. The procedure that is clearly stated in the denial notice.

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

Income data is certified and calculated in accordance with DOE program guidance. The State provides subgrantees with an "application for services/eligibility certification" on their eligibility for weatherization assistance. Individual subgrantees may expand or reformat this application (for example, to accommodate other types of assistance) however, a subgrantee must include all the items on the application form provided by the State. All applicants are required to identify the amount and source of income and testify to the correctness of their statements. In rental situations, property owners must sign the application to give authorization for the work. Falsification of an application is prohibited.

Describe Reweathering compliance

Re-weatherization:

Section 1011(h) of the Energy Act of 2020, amended 42 U.S. Code § 6865(c)(2) and removed the re-weatherization date, September 30, 1994, and create a "roll back" provision. Units that have received previous weatherization from receiving assistance and services (including the provision of information and education to assist with energy management) or from receiving non-Federal assistance for weatherization. The inclusion of "other Federal programs" includes all Federal funds including but not limited to those that units have not previously received assistance within the 15 year time frame. DHCD currently uses a web based software system in which subgrantees enter client information.

Disaster Planning and Relief: In the event of a natural disaster (i.e., flood, tornado, or fire) and in accordance with DOE guidance issued in WPN 12-7, the use of WAP funds for disaster planning and relief is allowable.

Allowable expenditures under WAP include: 1) the cost of incidental repairs to an eligible dwelling unit if such repairs are necessary to make the installation of weatherization materials (10 CFR 440.18(d)(9); 10 CFR 440.18(d)(15). To the extent that the services are in support of eligible weatherization work, the cost would be an allowable cost. Debris removal from a dwelling unit that is not to be weatherized would not be an allowable cost.

The average cost per dwelling unit limit applies.

Weatherization personnel can be paid from DOE funds to perform functions related to protecting the DOE investment. Such activities include: securing weatherization materials during the initial phase of the disaster response.

Using DOE funds to pay for weatherization personnel to perform relief work in the community as a result of a disaster is not allowable. Local agencies may use weatherization funds for Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards 2 CFR 200.

Describe what structures are eligible for weatherization

Eligible property types may be single family residences; 2-4 unit buildings; small multifamily buildings (Small multifamily buildings are defined as 3 stories or less, 5-24 units).

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are centrally heated/cooled, done on an as-needed basis with approval from DOE and DHCD); and manufactured housing. All may be owner-occupied or rental units. Virginia allows weatherization of shelters in accordance with DOE regulation in 10 CFR 440 regarding definition of 'shelter' as a dwelling unit or units whose principal use is for sheltering nursing homes, prisons, or similar institutional care facilities. For the purpose of determining how many dwelling units exist in a shelter, a subgrantee may count each shelter as one dwelling unit. A property review including age and historical designation is performed according to the State Historic Preservation Officer Programmatic Agreement. The Agreement is subject to the National Historic Preservation Act.

Describe how Rental Units/Multifamily Buildings will be addressed

The VA WAP Operations Manual (which is under a redesign) contains the procedures that address protection of renters' rights as specified in §440.22(b)(3) and §440.22(b)(4). The procedures ensure that:

- Written permission of the building owner or his agent before commencing work.
- Benefits of the services accrue primarily to the low-income tenants residing in such units.
- For a reasonable period of time after completion, the household will not be subjected to rent increases. VA's program specifies that no rent increases after WAP weatherization work performed or are documented contractually). The VA WAP Operations Manual requires adequate procedures whereby the state office ensures that no undue or excessive enhancement shall occur to the value of the dwelling unit as a result of WAP activities.
- No undue or excessive enhancement shall occur to the value of the dwelling unit as a result of WAP activities.
- Single family rental units are handled the same as single family owned units. The resident is determined eligible and the owner must sign off for work to be done.

Multifamily Rental and Weatherization:

This process has been developed to provide Subgrantees the ability to independently assess eligibility/feasibility, and to initiate, implement, and complete a multifamily weatherization project.

- Large Multifamily Housing – This housing category consists of buildings containing 5 or more dwelling units that are 4 or more stories above grade, or that contain 5 or more dwelling units per building, no matter the number of stories (e.g., high-rise apartment buildings, hotels, etc.).
- Low-Rise Multifamily – Formerly known as Small Multifamily, this housing category consists of buildings containing 5 or more dwelling units per building, no matter the number of stories (e.g., row houses, townhouses, etc.).
- 2-4 Unit Buildings – These buildings are treated as single-family residences from the perspective of the energy audit procedures, though they are reported as multifamily to DOE.

The Multifamily Weatherization process includes the following:

- Meeting with Owner (feasibility of project, VA-aligned SWS Field Guide standards).
- Tenant Applications, collect hard copy income documentation or a printed list of tenants by unit showing income if property is on HUD list.
- Based on number of eligible units, determine maximum allowable funding.
- Collect utility bills from previous 12 months.
- Completely fill in the required forms and send with all required documents to DHCD Program Administrator. This must be completed by the Subgrantee, not the Owner.
- Perform an audit and develop Scope of Work and send to DHCD. DHCD will approve or deny the Scope of Work. If approved, DHCD will forward to DOE for funding.
- Sign Project Agreement (DHCD template) between Agency and Owner.
- Subgrantee will procure subcontractors to complete work.
- Implementation- timeline, scheduling, order materials, notify residents, complete work, continuous quality control, technical oversight, recycle, storage of materials.
- DHCD reserves the right to inspect when first building is complete. Subgrantee must schedule with DHCD technical monitor.
- Subgrantee must conduct a final inspection on each unit and perform the required blower door and other diagnostic tests.
- Walk-through exit process with Owner.
- Reporting (eligible, non-eligible). Whether applications are used or the HUD list is used, all required demographic information must be collected for reporting.

Multifamily weatherization is also addressed in the Operations Manual.

Describe the deferral Process

Ineligible Properties

Properties occupied by ineligible households are not eligible for weatherization.

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Properties that may be deferred for weatherization include, but are not limited to the following reasons:

1. the building structure is not safe or structurally sound;
2. the sewage system has failed and requires correction prior to installation of weatherization measures;
3. other sanitary factors are present that prohibit the safe, timely and efficient installation of weatherization measures;
4. completion of weatherization work would endanger the client or providers;
5. the property (house) has been condemned or slated for demolition;
6. the presence of actionable levels of lead-based paint that cannot be mitigated by lead-safe weatherization;
7. the presence of severe moisture problems that cause mold that cannot be corrected by installation of weatherization measures;
8. friable asbestos or other asbestos issues exist that cannot be addressed with weatherization funding;
9. property is planned for relocation or sale;
10. planned property rehabilitation that will degrade installed weatherization measures;
11. if the job costs would cause the agency to exceed the maximum average job cost or to exceed maximums established for health and safety
12. the unit has received weatherization services with DOE funds after within fifteen years of prior weatherization services
13. any condition which may endanger the weatherization workers and is beyond the scope of this guidance

Deferrals also may be necessary in situations where:

1. the client has self-declared health conditions that prohibit installation of weatherization materials;
2. the client is uncooperative, abusive or threatening;
3. the illegal presence or use of controlled substances in the home exists during the weatherization process;
4. there are unsecured pets or wildlife that may pose a danger to workers;
5. the client refuses measures or declines services.

DHCD requires subgrantees to have a documented deferral policy. The client must be notified in writing regarding the deferral. The policy should include the following

- Specific reasons for deferral
- Specifics on how clients are notified of deferral
- Appeal procedure
- Template for tracking deferral/referrals

The Subgrantee is also required to develop a referral policy based on the resources available in their service area. The client must be notified in writing regarding the referral should be tracked alongside deferrals.

Grievance and Termination Policy

Any individual receiving assistance must receive written notification of the grantee's grievance policy. Grievance policies must be board-approved and provide specifics on how clients are notified of deferral. The grantee must be prepared to provide documentation of the grievance record for all project participant grantees.

Grantees may terminate assistance to a project participant who violates program requirements and resume assistance to a project participant whose assistance was previously terminated through the due process of law. This process must include at least two-levels. The initial level of the process should be held by the grantee organization wherein the grievance termination decision. Should the client or household disagree with the decision made by the initial reviewer, a second level must be available for an appeal. This two-level process should include: (1) Prompt written notice of the final decision to the project participant; and (2) Prompt written notice of the final decision to the project participant; and (3) Written policy for continuing assistance to surviving family members, not to exceed one year, measured from the date of death of the participant.

Client Complaint Policy

Each service provider must have available a system for a timely and fair administrative hearing of complaints received from clients denied services.

An unreasonable delay in acting on an application for assistance will constitute grounds for a hearing.

At the time of application, the applicant is given a written notice outlining the applicant's rights and the method to file a complaint. All subgrantees are required to advise the applicant of the method to file a complaint with DHCD in writing.

V.1.3 Definition of Children

Definition of children (below age): 19

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V.1.4 Approach to Tribal Organizations

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

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

Low-income members of an Indian tribe will receive benefits equivalent to the assistance provided to other low-income persons within the State.

V.2 Selection of Areas to Be Served

Virginia provides services statewide. All Virginia localities are eligible for assistance and includes cities, counties and towns. The Weatherization subgrantees were s which has, or is currently administering an effective program."

As required, factors considered when selecting a subgrantee include, at a minimum, the extent to which the subgrantee has achieved, or is achieving, weatherization g regulation's requirement for program effectiveness. The State evaluates the ability of each current subgrantee to achieve goals in a timely fashion as demonstrated in tl periods, Virginia DHCD requires the subgrantees to submit a Grant Management Plan (GMP).

The Grant Management Plan (GMP) is intended to foster improved management, communication, planning and accountability across Virginia's Weatherization network.

The three components of the GMP create a more proactive approach by 1) outlining and acknowledging expectations; 2) explaining the basic state of an agency's in program staff the financial staff; and 4) setting a consistent standard for all agencies with regard to contractor and crew management.

The plan was reviewed and developed by the Financial Operations Group (FOG), a working group consisting of DHCD staff and network volunteers.

All subgrantees serve multi-jurisdictional areas. Subgrantees are provided a DOE allocation using a formula that is based on low-income population and square mile: same formula allocation. Subgrantees are encouraged to coordinate with other Federal, State, local, or privately funded programs as required in 440.14, "Minimum p

V.3 Priorities

Priorities:

DOE regulations require agencies to give priority to identifying and providing weatherization assistance to elderly, persons with disabilities, and families with children programmed to manage all required priorities in the client files.

Additionally, DHCD receives client referral lists annually from Virginia Department of Social Services LIHEAP program which includes all fuel assisted clients and a contains an energy burden percentage for each client. Subgrantees reach out to these clients and offers applications to the Weatherization program. DHCD follows th

Fuel Switching:

At this time, DHCD does not allow fuel switching with DOE weatherization funding.

V.4 Climatic Conditions

According to the 2018 International Energy Conservation Code, the entire state of Virginia is classified as Zone 4 (A). The Code also determines the thermal criteri

V.5 Type of Weatherization Work to Be Done

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V.5.1 Technical Guides and Materials

When determining the rules and regulations of technical work, agencies should consider the following the hierarchy of documentation:

1. Latest Weatherization Program Notices (WPN's)
2. Federal DOE Weatherization Regulations
3. Virginia DOE State Weatherization Plan
4. Virginia Operations Manual and other Virginia Publications

All work done is consistent with its DOE-approved energy audit and Appendix A.

Virginia has updated its SWS Field Guide. Subgrantees are able to download copies directly from DHCD's website and are able to receive and email copy upon request.

Virginia modifies its Operations Manual periodically and the 202 version is currently under review.

DHCD includes all technical requirements by its subgrantees and their contractors in the Subgrantee Agreement. The Agreement must be signed before grant funds are released.

Section 4.11 (8)

8) The Subgrantee and Subgrantee's contractors shall perform weatherization services during the Program Year in accordance with the specifications outlined in the Program (WAP) state plan, Virginia's WAP Standard Work Specifications, and other program manuals and policies, as applicable and any amendments thereto. To ensure weatherization staff and sub-contractors receive and review these documents and use them to guide the weatherization work performed in client homes.

Field guide types approval dates

Single-Family: 2/10/2022
Manufactured Housing: 2/10/2022
Multi-Family:

V.5.2 Energy Audit Procedures

Audit Procedures and Dates Most Recently Approved by DOE

Audit Procedure: Single-Family

Audit Name: Other (specify)

All single family homes are audited using Hancock's Home Energy Auditing Tool (HEAT)

Approval Date: 3/24/2022

Audit Procedure: Manufactured Housing

Audit Name: Other (specify)

Manufactured Housing are modeled with Hancock's Home Energy Auditing Tool (HEAT)

Approval Date: 3/24/2022

Audit Procedure: Multi-Family

Audit Name:

Approval Date:

Comments

DHCD utilizes the Standard Work Specifications to weatherize homes. The measures outlined in the Standard Work Specifications have been customized to meet the needs of the home audit/estimation. This includes several diagnostic tests using specialized equipment. A final inspection by a certified Quality Control Inspector is required.

Due to the nature of Virginia's varied area and agency make up, DHCD uses the Grantee-Developed Quality Control Inspection Policy. These guidelines will allow for the audit and the final inspection, their agency will be subjected to a more stringent monitoring process, examining 10% across the agency. If an agency chooses to utilize this policy, it will remain agency-wide no matter if they occasionally choose to separate these roles at the final inspection.

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If the Virginia WAP determines that a local QCI fails to inspect to the field guide, Virginia will issue a finding and recommend/provide additional technical assistance probationary status or termination.

Language referencing the specifications for work and requiring inspection by QCI on every completed Weatherization job will be incorporated into each subgrantee

Single family

The HEAT audit is used for single family homes; manufactured housing; and multifamily residences up to 4 units, such as duplexes, triplexes, and quadplexes.

All Virginia subgrantees have been trained in the use of the latest version of HEAT and will periodically receive additional training as newer versions are made available. DHCD, and a HEAT audit must be completed and documented in the project file. These audits must be maintained in the file. Subgrantees inspect, review and approve

Multifamily

Low-rise multifamily buildings are defined as buildings with three stories or less and individually heated and cooled (not inclusive of duplexes, triplexes, or quadplexes). Multifamily projects will be considered on a case-by-case, as-needed basis, and a DOE Project Officer must grant approval on the project. VA does have an approval to DHCD for review and approval.

V.5.3 Final Inspection

Subgrantees are required to perform a final inspection of all weatherization measures (including any mechanical work performed) of each dwelling unit before the job inspection must be signed and dated by the qualified Quality Control Inspector. The date and name of the QCI inspector are required on the Job Report for each weatherization job. The Standard Work Specifications. Virginia DHCD has created a standardized form that will ensure SWS compliance on these final inspections. In order to be eligible for final inspection, extensions with a stated reason and a plan for prompt QCI beyond the 30 days of final weatherization installation.

In situations where a subcontractor is used to perform a portion or all of the weatherization work, DHCD holds the subgrantee contractually responsible for inspection. Subgrantees must be made aware of these requirements. A signed contractor agreement will be filed by the subgrantee proving these requirements have been outlined to the subcontractor.

Virginia is fortunate to have an IREC-accredited training center (WTC) in Christiansburg VA that is a national leader in implementing weatherization training programs. The Virginia WAP network currently employs or contracts one or more QCIs. Training and testing is available at the WTC to ensure agencies have access to sufficient training to pass the QCI certification, but is still eligible for re-testing. If a subgrantee does not have a QCI on staff, they must contract with another agency, the WTC, or some other qualified entity.

If a subgrantee chooses to use the same worker to conduct the initial Energy Audit and Quality Control Inspection, 10% of DOE jobs will be monitored by the Grant Officer.

If a subgrantee chooses to use separate workers to conduct the initial Energy Audit and Quality Control Inspection, 5% of DOE jobs will be monitored by the Grant Officer.

Failure to utilize a certified Quality Control Inspector on the final inspection of each weatherized unit will result in non-payment of that particular dwelling.

Quality Control Inspectors – Corrective Action for Inadequate Inspections

1st offense – Warning and Corrective Action

- The first time a QCI is determined by the Virginia Weatherization Program Technical Inspector to have passed work not in compliance, the QCI (with copy to the subgrantee) will be warned that the work was not in compliance and that the QCI must correct the measure at the agency's cost.

2nd offense – Additional Training and Field Mentor Shadow on Live Job (after training)

- The second time the QCI is found to have passed work not in compliance; the QCI will need to receive additional QCI training from a qualified trainer per the Standard Work Specifications. The QCI must perform a proper QCI, documented by written verification by the trainer. The Agency will be required to coordinate and pay for cost of training.

3rd offense – Loss of QCI privilege in the network.

- The third time a QCI is found to have passed work not in compliance; the QCI will forfeit their ability to QCI jobs in the Virginia WAP network. Suspended for 90 days.

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NOTE:

This will apply to both agency employed QCI's and contracted QCI's. Agencies who subcontract QCI services must ensure that these conditions are stated in the contract.

Above are the program minimum standards. Agencies have the option to follow more stringent actions if they so desire.

Specific language that will be inserted into sub-grantee and contractor agreements that indicates the signatory's responsibility to perform work to the specifications of the program.

The subgrantee and subgrantee's contractors shall perform weatherization services during the Program Year in accordance with the specifications of the Weatherization Assistance Program (WAP) state plan, Virginia's WAP Standard Work Specifications, and other program manuals and policies, as well as the responsibility to follow all work standards, to ensure weatherization staff and subcontractors receive and review these documents and use them accordingly.

V.6 Weatherization Analysis of Effectiveness

July 1 - June 30 is the normal period of performance in the weatherization contract between DHCD and the subgrantee. DHCD analysis of individual subgrantees, and the results of the monitoring visits, to determine subgrantees' willingness and ability to produce completed units, while coordinating with and utilizing multiple funding sources.

Monitoring of production and expenditure rates is ongoing and tied to the performance period in the contract between the Subgrantee and DHCD. DHCD shares general information provided as part of the "Summary Analysis" prepared with each invoice payment. Subgrantees are required to submit a Grant Management Plan in advance of the July 1 to track their expenditures and an effective way to evaluate quarterly progress. On-site financial and administrative monitoring visits are conducted annually and subgrantee performance is monitored and universally, to provide accurate historical data on subgrantee performance.

Future training and technical assistance are determined from subgrantee feedback and the results of the monitoring visits. DHCD coordinates with VA's IREC-certified weatherization technique is consistently found to need improvement, the Training Center can also be brought in to provide on-site support, so the correct work (Tier 2) options, for ongoing professional development. Finally, DHCD utilizes a network-wide training tracking system for all in-house crew and subcontractors, to ensure quality and consistency.

1) The PAC has since grown from 5 to 8 very active members and met in April 2021 of the last program year and April 2022. (We aim to meet 3 times a year with subgrantees to know exactly what is or is not different.

2) Monitoring and Corrective Action:

Proposed Actions:

- Increase timeliness of feedback from monitoring
- Revamp monitoring letter format with more focus on major issues

DHCD has significantly improved its timeliness of monitoring responses for the administrative and programmatic monitoring. Previous delays had been a result of limited staff resources.

V.7 Health and Safety

Weatherization Grantee Health

☒ **Policy Submitted with**

1.0 – General Information

Grantees are encouraged to enter additional information here that does not fit neatly in one of the other sections of this document.

2.0 – Budgeting

Grantees are encouraged to budget Health & Safety (H&S) costs as a separate category and, thereby, exclude such costs from the average cost per unit cost (ACPU) limitation. This separate category also excludes operations category rather than the H&S category, the related H&S costs must be included in the calculation of the ACPU and cost-justified through the approved energy audit.

Select which option is used by the grantee:

Separate Health and Safety Budget ☒

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3.0 – Health and Safety Expenses

Pursuant to [10 CFR 440.16\(d\)](#), Grantees must set H&S expenditure limits for their Program, providing justification by explaining the basis for setting these limits and providing related historical experience.

Low percentages should include a statement of what other funding is being used to support H&S costs, while larger percentages will require greater justification and relevant historical support. It is possible ACPU is \$5,000, then an average expenditure of \$750 per dwelling would equal 15 percent expenditures for H&S.

DHCD maintains a overall expenditure cap of 15% of Program Operations. However, 15 percent is not a limit on H&S expenditures, at the subgrantee level, but exceeding this amount will require ample justification and are not calculated into the per-house limitation. DOE strongly encourages using the table below in developing justification for the requested H&S budget amount. Each H&S measure the Grantee anticipates over the total production for the year.

It is also recommend reviewing recent budget requests, versus expenditures to see if previous budget estimates have been accurate. The resulting "Total Average H&S Cost per Unit" multiplied by the Grantee

Should a Grantee request to have more than 15 percent of Program Operations used for health and safety purposes, DOE will conduct a secondary level of review. DOE strongly encourages use of this H&S table

4.0 – Incidental Repair Measures

If Grantees choose to identify any H&S measures as incidental repair measures (IRMs), they must be implemented as such under the Grantee's weatherization program in all cases – meaning, they can never be a separate measure;

Incidental Repairs means those repairs necessary for the effective performance or preservation of weatherization materials. Such repairs include, but are not limited to, framing or repairing windows and doors. ("Definitions")

- o Window and door replacements are allowable as an Incidental Repair measure but must first be modeled as an energy savings measure. Auditor must clearly document
- o If the measure does not receive a SIR of 1.0 or greater a copy of the Hancock Energy savings report and audit tool input report must be saved in the client file
- o If the individual measure(s) or job saving to investments ratio falls below the 1.0 threshold then replacement is not permitted.
 - o If co-funding DOE funds must stop at the overall cost effectiveness of the job and/or measure.

5.0 – Deferral/Referral

Deferral of services may be necessary if H&S issues cannot be adequately addressed according to WPN 22-07 guidance. The decision to defer work in a dwelling is difficult but necessary in some cases. This judgment of the auditor, any conditions exist which may endanger the health and/or safety of the workers or occupants, the unit should be deferred until the conditions are corrected. Deferral may also be necessary if the client is uncooperative, abusive or threatening. Grantees must also provide a process for the client to appeal the deferral decision to a higher level in the organization.

Deferral may be necessary in the following situations:

- The client has known health conditions that prohibit the installation of weatherization materials.
- The building structure or components are in such a state of disrepair that failure is imminent and the conditions cannot be resolved cost-effectively.
- The house has sewage or other sanitary problems that would further endanger the client and installers if weatherization work is performed.
- The house has been condemned.
- Moisture problems are beyond the scope of this guidance.
- The client is uncooperative, abusive or threatening.
- Any condition which may endanger the weatherization workers and is beyond the scope of this guidance.

The Subgrantee is required to develop a deferral policy. The client must be notified in writing regarding the deferral. The Subgrantee is also required to develop a referral policy. The referral policy must include the reason for referral and contact information of the agency receiving the referral.

Yes ☒ No ☐

Where can this deferral/referral policy be accessed?

- o Virginia WAP Program Operations Manual

6.0 – Hazard Identification and Notification

Documentation forms must be developed that include at a minimum: the client's name and address, dates of the audit assessment and when the client was informed of a potential H&S issue, a clear description of the hazard, and the client's rights and options.

Documentation Form(s) have been developed and used

Yes ☒ No ☐

7.0 – Health and Safety Categories

For each of the following H&S categories identified by DOE:

- Explain whether you concur with existing guidance from WPN 22-07 and how that guidance will be implemented in your Program, if you are proposing an alternative action/allowability, or if the identified category will not be addressed and will always result in deferral. Alternatives must be comprehensively explained and meet the intent of DOE guidance.
- Where an Action/Allowability or Testing is "required" or "not allowed" through WPN 22-07, Grantees must concur, or choose to defer all units where the specific category is encountered.

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- "Allowable" items under WPN 22-07 leave room for Grantees to determine if the category, or testing, will be addressed and in what circumstances.
- In accordance with WPN 22-07, DHCD will produce an occupant pre-existing or potential health condition screening form to be used during client intake.
- Declare whether DOE funds or alternate funding source(s) will be used to address the particular category.
- Describe the explicit methods to remedy the specific category.
- Describe what testing protocols (if any) will be used.
- Define minimum thresholds that determine minor and major repairs
- Identify minimum documentation requirements for at-risk occupants
- Discuss what explicit steps will be taken to educate the client, if any, on the specific category if this is not explained elsewhere in the Plan. Some categories, like mold and moisture, require client education.
- Discuss how training and certification requirements will be provided for the specific category. Some categories, like Lead Based Paint, require training.
- Describe how occupant health and safety concerns and conditions will be solicited and documented

Grantees may include additional H&S categories for their particular Programs. Additional categories must include, at a minimum, all of the same data fields as the DOE-provided categories. Two additional tables have been created to utilize.

7.1 – Air Conditioning and Heating Systems

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☒ Alternative Guidance ☐ Results in Deferral ☐
Air Conditioning Unallowable Measure ☐ Heating Unallowable Measure ☐

Funding

DOE ☒ LIHEAP ☐ State ☐ Utility ☐ Other ☐

How do you address unsafe or non-functioning primary heating/cooling systems?

Definitions

- **Primary Heat Source:** The primary system is generally understood to be the unit (or system of units) most relied upon to provide heating throughout the season. These systems may or may not be centralized but do provide the majority of the heating for the home.
- **Secondary Heat Source:** Secondary systems or unit are employed only in extreme weather or

as backup to the primary system and do not provide heat to the entire dwelling.

Action/Allowability

Category Decisions: Perform a full DOE-approved energy audit prior to deciding how to categorize the cost of heating/cooling system repair or replacement. If the measure is an approved WAP expenditure and the audit justifies the costs with a Savings to Investment (SIR) equal to or greater than 1.0, the measure must be performed, and costs charged as an Energy Conservation Measure (ECM) or Energy Savings (ES) measure. If the measure is not an

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eligible ECM or ES, the measure may be charged as a Health and Safety (H&S) measure if there is a documentable imminent threat.

When a primary space conditioning system does not qualify as an ECM\ES and will be considered for replacement, repair, or installation with H&S funds. Follow the Building Performance Institutes (BPI) protocols for combustion safety testing. Every combustion appliance must receive a combustion test under worst case

Required:

- Replace, repair, or install primary heating systems when existing primary heating systems are unsafe, inoperable, or nonexistent. **No home may be left without a safe primary heating system(s).**
- **No DOE-funded weatherization work is permitted if the completed dwelling unit will be heated with an unvented combustion space heater as the primary heat source.** The primary heat source must be replaced with a vented unit prior to or by weatherization. The replacement unit must be sized to heat the entire dwelling unit.
- Sub-grantees must comply with the Manufactured Home Construction and Safety Standards which mandates that:
 - All fuel-burning appliances in manufactured homes except: ranges, ovens, illuminating appliances, clothes dryers, solid fuel-burning fireplaces and solid fuel- burning stoves, must be installed to provide for the complete separation of the combustion system from the interior atmosphere of the manufactured home (i.e., to draw their combustion air from outside), and be vented to outside the dwelling.
 - All appliances installed by weatherization in manufactured homes must meet these standards, including secondary heating sources. **No unvented fuel-burning space heating appliances may remain in a MH after weatherization under any circumstances.** If an occupant will not allow the removal of an unsafe combustion appliance from the home, deferral is required.
 - Repair or replace combustion gas venting to ensure proper combustion gas venting to outside the dwelling for all combustion appliances, including but not limited to gas dryers and refrigerators, furnaces, vented space heaters, and water heaters
- If weatherization installs an appliance that is vented into a masonry chimney, the chimney must be lined in compliance with the International Fuel Gas Code (IFGC) or local AHJ if more stringent.
- Install adequate combustion air for all combustion appliances left after weatherization.
- If permits are required for heating/cooling system work, they must be secured. Copies of the inspection reports must be in the client file. If a locality does not require a permit for installing a heating or cooling system subgrantees must document this in the client file. Examples of acceptable documentation when a permit is not required by a locality are emails or written letter/statement from the locality.
- If unsafe conditions relating to existing combustion appliances require remediation to safely perform weatherization and cannot be remedied by repair or tuning, replacement is an allowable H&S measure unless prevented by other guidance herein.
- Documentation justifying the replacement with a cost comparison between replacement and repair must be maintained in the client file.

Allowable:

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- Repair, removal, and replacement of unsafe primary solid fuel heating appliances.

How do you address unsafe or non-functioning secondary heating systems, Including unvented secondary space heaters?

Required:

Unsafe secondary units, including space heaters, must be repaired, or removed and disposed of, or deferral is required. Secondary unvented space heaters are considered unsafe if they:

- are not listed and labeled as meeting ANSI Z21.11.2;
- have an input rating of more than 40,000 BTU/hour;
- are in a bedroom and have an input rating of more than 10,000 BTU/hour;
- are in a bathroom and have an input rating of more than 6,000 BTU/hour;
- are operating in an unsafe manner (e.g., high carbon monoxide (CO) readings, too close to combustible materials, lack sufficient combustion air volume);
- or are not permitted by the Authority Having Jurisdiction (AHJ).

Allowable:

- Repair or removal of secondary solid fuel heating appliances.

Prohibited:

- Using DOE WAP H&S funds for replacement or installation of secondary heat sources.
- Repairs to electric space heaters are not permitted

Indicate Documentation Required for At-Risk Occupants

Allowable:

Replace, repair, or install primary air conditioning in homes where current occupants are considered “*at-risk*”.

- At risk occupants are defined as
 - Elderly (60 years or older)
 - Children (Under the age of 6)
 - Documentation from a medical professional indicating an occupant requires air conditioning.

Testing Protocols

Required:

- Verify that primary heating systems are present, operable, and performing correctly.
- Conduct a visual inspection of all combustion appliances and their related venting
- Conduct combustion appliance testing of all gas and liquid-fueled combustion appliances.
- **Depressurization and spillage testing is required for all combustion appliances pre-weatherization, post- weatherization and before leaving the home on any day when work has been done that could affect draft (e.g., air or duct sealing, adding exhaust ventilation). Documentation must be retained in the client/job file.**
- CO testing is required for all gas and liquid-fueled combustion appliances, regardless of venting type.
- Verify proper clearances for all combustion venting types
- Visually inspect the entirety of solid fuel-fired appliance installations (e.g., wood stoves, coal stoves, pellet stoves, fireplaces) including the venting system to ensure it adheres to the applicable code or local authority having jurisdiction. Appliances must be inspected pre- and post-weatherization and any safety issues found should be included in the client H&S notification form.
- Conduct pre- and post- weatherization worst case CAZ depressurization testing in spaces having a fireplace or woodstove. Since there is no consensus method for verifying safe operation of fireplaces

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and woodstoves, Venting must meet national or local codes whichever is more stringent, or the home cannot be weatherized.

- Safety inspections related to space heaters, fireplaces, and woodstoves must include, but not be limited to, verification of adequate floor protection, and code-compliant clearances to walls and other combustible materials.
-

Client Education

Required:

- Appropriate use and maintenance of units.
- Provide all paperwork, warranty information and manuals for any equipment installed by weatherization.
- Discuss and provide information on proper disposal of bulk fuel tanks when not removed as part of the weatherization work.

Where combustion equipment is present, provide combustion safety and hazards information including how to recognize depressurization, dangers of CO poisoning, and fire risks associated with combustion appliance use

○

Training

- WAP H&S policy training on allowable activities.
- Licensing and/or certification for HVAC installers as required by authority having jurisdiction (AHJ).
- CAZ depressurization test and inspection training.

7.2 - Asbestos - All

What is the blower door testing policy when suspected Asbestos Containing Material (ACM) is identified?

Action/Allowability

Required:

- When suspected friable Asbestos Containing Materials (ACM) are present, including vermiculite, assume they contain asbestos and take precautionary measures to prevent disturbing it during the audit and work unless testing determines otherwise.
- Friable is defined as a material that can be crumbled or powdered by hand.
- Blower door testing is not permitted if friable asbestos is present or assumed.

Allowable:

- Temporary removal and reinstallation of ACM siding to perform an ECM (e.g., wall insulation).
- Limited encapsulation or removal of suspected ACM on small surfaces (pipes, ductwork, furnaces, other small, covered surfaces, etc.) by an appropriately trained asbestos control professional if necessary to safely weatherize the dwelling.
 - Limited is defined as work less than \$1000

Prohibited:

- Using DOE WAP H&S funds for general abatement/removal/or replacement of asbestos siding, thermal system insulation (TSI) or Transite, or vermiculite.

Testing/Inspection

Required:

- Visually inspect all surfaces (i.e., walls, floors, ceilings, roofs) for suspected ACM prior to drilling or cutting.

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- Assume asbestos is present in suspect materials unless testing reveals otherwise.

Allowable:

- Sample collection and testing of suspected ACM conducted by an Asbestos Hazard Emergency Response Act of 1986 (AHERA) certified tester.
- Baseline indoor environmental asbestos sampling.

Occupant Education

Required:

- Formally notify the occupant, and landlord if applicable, in writing:
 - of suspected ACMs that are present and what precautions will be taken to ensure the occupants' and workers' safety during weatherization;
 - of results if testing was performed;
 - not to disturb suspected ACM;

When deferral is necessary due to asbestos, occupant, or landlord if applicable, must provide documentation that a certified professional performed the remediation before work continues.

7.2a – Asbestos - in siding, walls, ceilings, etc.

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☒ Alternative Guidance ☐ Results in Deferral ☐

Funding

DOE ☒ LIHEAP ☐ State ☐ Utility ☐ Other ☐

How do you address suspected ACM's in siding, walls, or ceilings that will be disturbed through the course of weatherization work?

See asbestos all section

◦

Testing Protocols

◦

Client Education

Training and Certification Requirements

◦

7.2b – Asbestos - in vermiculite

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☒ Alternative Guidance ☐ Results in Deferral ☐

Funding

DOE ☒ LIHEAP ☐ State ☐ Utility ☐ Other ☐

How do you address suspected ACM's in vermiculite that will be disturbed through the course of weatherization work?

See asbestos all section

◦ .

Testing Protocols

Client Education

◦ \

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Training and Certification Requirements

o

7.2c – Asbestos - on pipes, furnaces, other small covered surfaces

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☒ Alternative Guidance ☐ Results in Deferral ☐

Funding

DOE ☒ LIHEAP ☐ State ☐ Utility ☐ Other ☐

How do you address suspected ACM's (e.g., pipes, furnaces, other small surfaces) that will be disturbed through the course of weatherization work?

See asbestos all section

o .

Testing Protocols

o

Client Education

o

Training and Certification Requirements

o

7.5 – Biologicals and Unsanitary Conditions

(odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.)

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☒ Alternative Guidance ☐ Results in Deferral ☐
Unallowable Measure ☐

Funding

DOE ☒ LIHEAP ☐ State ☐ Utility ☐ Other ☐

What guidance do you provide Subgrantees for dealing with biological and/or unsanitary conditions in homes slated for weatherization?

Action/Allowability

Required:

- Deferral where conditions (odors, bacteria, raw sewage, rotting wood, etc.) in the home pose a health risk to occupants and/or weatherization workers or may be worsened by weatherization activities (e.g., air sealing) and will not be resolved by weatherization.

Allowable:

- Limited remediation of conditions that may lead to or promote biological concerns and unsanitary conditions (e.g., repairing leaking sewage pipe).
 - o Limited remediation is defined as repairs less the \$1000.
- Limited cleaning of the workspace to protect the health and safety of workers and occupants.
 - o Limited cleaning is defined as cleaning less than \$1000.

o

Testing Protocols

Required:

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- Sensory inspection of interior, exterior, attics, and subspaces of the dwelling.

Prohibited:

- Using DOE WAP H&S funds for testing of materials for biological contaminants.
-

Client Education

Required:

- Inform occupant in writing of observed biological and unsanitary conditions.
-

Training

- How to recognize unsafe conditions and when to defer
- Safe work practices when encountering such conditions

7.6 – Building Structure and Roofing

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☒ Alternative Guidance ☐ Results in Deferral ☐

Funding

DOE ☒ LIHEAP ☐ State ☐ Utility ☐ Other ☐

What guidance do you provide Subgrantees for dealing with structural issues (e.g., roofing, wall, foundation) in homes slated for weatherization?

Action /Allowability

Allowable:

- **Minor repairs to building structure or roofs.**
- ***Structure repairs including roofing repairs must not exceed 100sqft in total repairs***

Prohibited:

- Using DOE WAP H&S funds for **major repairs.**
- Major structure and roofing repairs is defined as repairs larger than 100sqft
- Using DOE WAP H&S funds for building rehabilitation.

Testing/Inspection

Required:

- **Visual inspection of building structure and roofing for damages that compromise building durability and to verify that portions of the home where weatherization will occur are safe for entry and performance of assessments, work, and inspections.**

Prohibited:

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- Using DOE WAP H&S funds for any testing/evaluation of structural materials by a third- party.

○

How do you define “minor” or allowable structure and roofing repairs, and at what point are repairs considered beyond the scope of weatherization?

- Minor roofing repairs are small repairs that do not require a permit (<100 sq ft)
- Roofing repairs will only be allowed as an incidental measure to protect installed weatherization measures.

If priority lists are used, and these repairs are designated as Incidental Repairs, at what point is a site-specific audit required?

N/A

Client Education

Required:

- Notify occupant in writing of structurally compromised areas.

○

Training

How to identify structural and roofing issues

7.7 – Code Compliance

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☒ Alternative Guidance ☐ Results in Deferral ☐

Funding

DOE ☒ LIHEAP ☐ State ☐ Utility ☐ Other ☐

What guidance do you provide Subgrantees for dealing with code compliance issues in homes receiving weatherization measures?

Action/Allowability

Allowable:

- Correction of preexisting code compliance issues triggered by weatherization measures being installed in a specific room or area of the home. If the installation of a weatherization measure triggers the correction of a preexisting code compliance issue, and is paid for with WAP funds, the specific code requirements with reference to the weatherization measure(s) that triggered the code compliance issue must be documented in the occupant file.

Prohibited:

- Using DOE WAP H&S funds for correction of preexisting code compliance issues not directly related to the installation of specific weatherization measures in the home.
- Using DOE WAP funds for work on condemned properties and properties where H&S
- conditions exist that cannot be corrected under this guidance.

Testing/Inspection

Required:

- Visual inspection.

What specific situations commonly trigger code compliance work requirements for your network? How are they addressed?

- When correction of preexisting code compliance issues is triggered and paid for with WAP funds, cite

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specific code requirements with reference to the weatherization measure(s) that triggered the code compliance issue in the client file.

Client Education

Required:

- o Inform occupant in writing of observed code compliance issues when it results in a deferral.

Training

- o How to determine what code compliance may be required.
- o Knowledge of state and local codes.

7.8 – Combustion Gases

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☒ Alternative Guidance ☐ Results in Deferral ☐

Funding

DOE ☒ LIHEAP ☐ State ☐ Utility ☐ Other ☐

Testing Protocols

- o Combustion safety testing is required when combustion appliances are present.
- o Test naturally drafting appliances for spillage and CO during CAZ depressurization testing pre and post-weatherization and before leaving the home on *any* day when work has been done that could affect draft (e.g., tightening the home, adding exhaust, etc.)
- o Inspect venting of combustion appliances and confirm adequate clearances.
- o Check DOE-approved audit to determine if the appliance can be justified as an ECM prior to replacement as an H&S measure.

How are crews instructed to handle problems discovered during testing, and what are the specific protocols for addressing hazards that require an immediate response?

- o Proper venting to the outside for combustion appliances, including gas dryers and refrigerators, furnaces, vented space heaters, and water heaters is required.
- o Correct venting when testing indicates a problem.
- o If unsafe conditions whose remediation is necessary to perform weatherization cannot be remedied by repair or tuning, replacement is an allowable H&S measure unless prevented by any guidance herein.
- o Maintain documentation in justifying the replacement with a cost comparison between replacement and repair in the client file.
- o Replacement units must meet safety guidelines as determined in the Grantee plan or technical field guide.
- o See Air-Conditioning and Heating Systems section and Attachment A for more information

Client Education

- o Provide client with combustion safety hazards information.

Training

- o How to perform appropriate testing, determine when a building is excessively depressurized, and the difference between air free and as-measured CO.
- o CO action levels.

7.9 – Electrical

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☒ Alternative Guidance ☐ Results in Deferral ☐

Funding

DOE ☒ LIHEAP ☐ State ☐ Utility ☐ Other ☐

What guidance do you provide Subgrantees for dealing with electrical hazards, including knob & tube wiring, in homes slated for weatherization?

Action/Allowability

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Weatherization Assistance Program (WAP)
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Required:

- Provide sufficient over-current protection and damming prior to insulating building components containing knob and tube wiring, as required by the AHJ.

Allowable:

- Minor electrical repairs (e.g., junction box covers, improper splices) to protect the occupant or workers from electrical hazards within the living area or in the immediate area where weatherization activities will occur. Documentation of the needed repairs must be retained in the client/job file.
 - Minor electrical repairs are repairs that do not exceed \$1000.

Prohibited:

- Using DOE WAP H&S funds for major electrical repairs.
 - Major electrical repairs are electrical repairs that exceed \$1000 that are also required to safely install weatherization measure.

Testing/Inspection

Required:

- Visual inspection for presence and condition of knob-and-tube wiring.
- Evaluate knob-and-tube wiring for safety prior to work.
- Check for alterations that may create an electrical hazard.

Allowable:

- Voltage drop and voltage detection testing.

How do you define “minor” or allowable electrical repairs, and at what point are repairs considered beyond the scope of weatherization?

Prohibited:

- Using DOE WAP H&S funds for major electrical repairs.
- Major electrical repairs are electrical repairs that exceed \$1000 that are also required to safely install weatherization measure.
 - .

If priority lists are used, and these repairs are designated as Incidental Repairs, at what point is a site-specific audit required?

N/A

Client Education

Required:

- Provide occupant with written documentation of any electrical hazards identified that will not be addressed by weatherization
- Provide information to occupant on over-current protection, overloading circuits, and basic electrical safety/risks if conditions warrant.

Training

- How to identify electrical hazards.
- Local (or AHJ) code compliance.

**7.10 – Formaldehyde, Volatile Organic Compounds (VOCs),
Flammable Liquids, and other Air Pollutants**

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Concurrence, Alternative, or Deferral

Concurrence with Guidance ☒ Alternative Guidance ☐ Results in Deferral ☐

Funding

DOE ☒ LIHEAP ☐ State ☐ Utility ☐ Other ☐

What guidance do you provide Subgrantees for dealing with formaldehyde, VOCs, flammable liquids, and other air pollutants identified in homes slated for weatherization?

- o Removal of pollutants is allowed and is required if they pose a risk to workers.
- o If pollutants pose a risk to workers and removal cannot be performed or is not allowed by the client, the unit must be deferred.

Testing Protocols

- o Sensory inspection

Client Education

- o Inform the client in writing of observed hazardous condition and associated risks.
- o Provide client written materials on safety issues and proper disposal of household pollutants.
- o When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

Training

- o How to recognize potential hazards and when removal is necessary.

7.11 – Fuel Leaks

(please indicate specific fuel type if policy differs by type)

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☒ Alternative Guidance ☐ Results in Deferral ☐

Funding

DOE ☒ LIHEAP ☐ State ☐ Utility ☐ Other ☐

Remediation Protocols

Action/Allowability

Required:

- When a gas leak is found on the utility side of service, the utility service must be contacted, work must be temporarily halted, and the leak must be repaired before work may proceed.
- Fuel leaks that are the responsibility of the occupant (vs. the utility) must be repaired before installing weatherization measures in the home.

Allowable:

- Replacement or repair of leaking bulk fuel tanks and/or lines if connected systems will remain after weatherization.
- Replacement of flexible appliance gas connectors that are not compliant with current fuel gas codes.

Prohibited:

- Using DOE WAP H&S funds to repair leaks that are the responsibility of the utility to correct.
- Environmental cleanup resulting from bulk fuel leaks using DOE WAP H&S funds.

Testing/Inspection

Required:

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- Test all exposed gas lines, fittings, valves, and connections for fuel leaks from utility connection to the appliance throughout the home.
- Test all gas appliances for fuel leaks at all connections, valves, fittings, and burners.
- Conduct sensory inspection of all bulk fuels lines and storage tanks to determine if leaks exist.

Prohibited:

- Using DOE WAP H&S funds for environmental testing of soil or water.
-

How do you define allowable fuel leak repairs, and at what point are repairs considered beyond the scope of weatherization?

- Repairs are allowed where health and safety of the occupant is at risk. Subgrantees have the ability to control costs per job as long as the Average Job Cost remains under the state average.

Client Education

Required:

- Inform occupants in writing of fuel leak testing results, including specific location if fuel leaks are detected.
-

Training

- Fuel leak testing

7.12 – Gas Ovens / Stove-tops / Ranges

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☒ Alternative Guidance ☐ Results in Deferral ☐

Funding

DOE ☒ LIHEAP ☐ State ☐ Utility ☐ Other ☐

What guidance do you provide Subgrantees for addressing unsafe gas ovens/stoves/ranges in homes slated for weatherization?

Action/Allowability

Allowable:

- Gas cooking appliance(s) producing actionable levels of carbon Monoxide (>225ppm) must receive a clean and tune. If a clean and tune does not lower the CO levels below the actionable threshold the unit may be replaced.
- If a clean and tune is not reasonable due to the existing unit's condition this must be clearly documented in client file. Written approval from DHCD must be obtained and placed in client records ahead of installation.

Required:

- If WAP funds are used to install a new gas cooking appliance subgrantees are also required to install spot ventilation that vents to outdoors.
- If a home is configured in a way that prohibits the installation of a spot ventilation fan. Subgrantees must get written permission to install the cooking appliance without spot ventilation from DHCD or the job must be deferred. This document must be placed in the client file.
-

Testing Protocols

Required:

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- Test gas ovens for CO.
- Visually inspect cooking burners and ovens for operability and flame quality.

Client Education

Required:

- Inform occupants of the importance of using exhaust ventilation when cooking and the importance of keeping burners and broilers clean to limit the production of CO.
-

Training

- Testing techniques
- CO action levels

7.13 – Hazardous Materials Disposal

[Lead, Refrigerant, Asbestos, Mercury (including CFLs/fluorescents), etc.]

(please indicate material where policy differs by material)

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☒ Alternative Guidance ☐ Results in Deferral ☐

Funding

DOE ☒ LIHEAP ☐ State ☐ Utility ☐ Other ☐

Action/Allowability

Required:

- Hazardous Waste Materials generated by weatherization work (e.g., refrigerant, asbestos, lead, mercury, CFL lighting bulb/ballasts, etc.) must be disposed of according to all local and federal laws, regulations, and guidelines, as applicable. Costs specifically related to disposal may be charged as a H&S expense.
- Subgrantees must document disposal requirements in contract language with the responsible party.
- Limited removal of pollutants that pose a risk to workers is required (e.g., flammable liquids, hazardous chemicals, and other air pollutants).
 - Reasonable actions such as removing gas cans or other items that can be handled by an individual may be removed. If handling of a hazardous material poses a risk and/or if the removal of the hazardous material will exceed \$1000 then the job must be deferred.
 - **Caution!!!!!! Do not handle unknown and/or potentially hazardous materials!**
- If removal cannot be performed or is not allowed by the occupant, the unit must be deferred.

Allowable:

- Limited removal of pollutants that pose a risk to the occupant.
- Reasonable actions such as removing gas cans or other items that can be handled by an individual may be removed. If handling of a hazardous material poses a risk and/or if the removal of the hazardous material will exceed \$1000 then the job must be deferred.
 - Caution!!!!!! Do not handle unknown and potentially hazardous materials!

Prohibited:

- Using DOE WAP H&S funds for Lead, Asbestos, and Radon abatement.

Testing/Inspection

Required:

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- Sensory inspection.

Prohibited:

- Using DOE WAP H&S funds for any testing for hazardous materials other than that specifically permitted in the asbestos, lead, and radon sections of this document.

Client Education

Required:

- Inform occupant in writing of hazards associated with hazardous waste materials being generated/handled in the home.
- Inform occupant in writing of observed hazardous condition and associated risks.
- Provide occupant written materials on safety issues and proper disposal of household pollutants.
-

Training

- Appropriate Personal Protective Equipment (PPE) for working with hazardous waste materials.
- Disposal requirements and locations.
- Health and environmental risks related to hazardous materials.

Disposal Procedures and Documentation Requirements

- Hazardous Waste Materials generated in the course of weatherization work shall be disposed of according to all local laws, regulations, and/or Federal guidelines, as applicable.
- Document proper disposal requirements in contract language with responsible party.
- Refer to Lead and Asbestos sections for more information on those topics.

7.14 – Injury Prevention of Occupants and Weatherization Workers

(Measures such as repairing stairs and replacing handrails)

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☒ Alternative Guidance ☐ Results in Deferral ☐

Funding

DOE ☒ LIHEAP ☐ State ☐ Utility ☐ Other ☐

What guidance do you provide Subgrantees regarding allowable injury-related repairs (e.g., stairs, handrails, porch deck board)?

Action/Allowability

Allowable:

- Minor repairs and installations (e.g., repairing stairs, replacing handrails, etc.).
 - Minor repairs are repairs that do not exceed \$1000.

Prohibited:

- Using DOE WAP H&S funds for major repairs.
 - Major repairs are repairs that exceed \$1000

Testing/Inspection

Required:

- Visually inspect for dangers that would prevent weatherization.

Occupant Education

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Required:

- If identified hazardous conditions will not be corrected during weatherization, inform occupant in writing of observed hazards and associated risks utilizing the “Hazard Identification Notification Form” required by [WPN 22-7](#).

How do you define “minor” or allowable injury prevention measures, and at what point are repairs considered beyond the scope of weatherization? Quantify “minor” or allowable injury prevention measures.

- Minor repairs are repairs that do not exceed \$1000
-
-

Training

- Hazard Identification

7.15 – Lead Based Paint

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☒ Alternative Guidance ☒ Results in Deferral ☐

Funding

DOE ☒ LIHEAP ☐ State ☐ Utility ☐ Other ☐

Safe Work Protocols

Action/Allowability

Required:

- Subgrantees must comply with EPA's Lead; Renovation, Repair and Painting Program (RRP) rules when working in pre-1978 housing unless testing confirms the work area to be lead free. This includes, but is not limited to:
 - **Client file documentation including the Certified Renovator's certification; any training provided on-site; description of specific actions taken; lead testing and assessment documentation; and photos of site and containment set up. Include the location of photos referenced if not in file.**
 - Certification and training requirements of the RRP rule.
 - Job site set up and cleaning verification by a Certified Renovator.
- Only those costs directly associated with lead safe work practices for surfaces directly disturbed during weatherization activities are allowable WAP H&S expenses.

Prohibited:

- Using DOE WAP H&S funds for lead abatement.
- Using DOE WAP H&S funds for purchase, resourcing, or maintenance of X-ray Fluorescence (XRF) devices.

Testing Protocols

Allowable:

- Testing to determine the presence of lead on surfaces that will be disturbed by WAP measure installation is allowed with EPA-approved testing methods.
- Alternatively, if EPA-approved testing is not conducted, the Subgrantee may assume lead is present and work in compliance with EPA RRP rules.

Client Education

Required:

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- o Follow pre-renovation education requirements per EPA RRP rules.

Training and Certification Requirements

- o All workers in job roles defined by VA WAP Information Notice 02-2024 are required to obtain Lead Safe Weatherization certification.
- o All employees and contractors working on pre-1978 homes must receive training to install measures in a lead-safe manner in accordance with the SWS and EPA protocols, and installation must be overseen by an EPA Certified Renovator.
- o Grantee Monitors and Inspectors must be Certified Renovators.

Documentation Requirements

- o Deferral is required when the extent and condition of lead-based paint in the house would potentially create further H&S hazards.
- o Only those costs directly associated with the testing and lead safe practices for surfaces directly disturbed during the weatherization activities are allowable.
- o Documentation in the client file must include Certified Renovator certification; any training provided on-site; description of specific actions taken; lead testing and assessment documentation; and, photos of site and containment set up. Include the location of photos referenced if not in the file.

7.16 – Mold and Moisture

(Including but not limited to: drainage, gutters, down spouts, extensions, flashing, sump pumps, dehumidifiers, landscape, vapor retarders, moisture barriers, etc.)

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☒ Alternative Guidance ☐ Results in Deferral ☐

Funding

DOE ☒ LIHEAP ☐ State ☐ Utility ☐ Other ☐

What guidance do you provide Subgrantees for dealing with moisture related issues (e.g., drainage, gutters, down spouts, moisture barriers, dehumidifiers, vapor barrier on bare earth floors) in homes slated for weatherization?

Action/Allowability

Allowable:

- Limited water damage repairs that can be addressed by weatherization workers are allowed when necessary to weatherize the home and to ensure the long-term stability and durability of the measures.
 - o Water damage repairs cannot exceed \$1000.
- Source control (i.e., correction of moisture and mold creating conditions) when necessary, to weatherize the home and to ensure the long-term stability and durability of the measures. Source control is independent of latent damage and related repairs. Source control includes, but is not limited to site drainage, gutters, down spouts, extensions, flashing, sump pumps, dehumidifiers, landscape, leaking roofs, vapor retarders, moisture barriers, etc.
 - o Source control measures must not exceed \$1000.
- Window and door repairs are allowed with H&S funds to resolve a bulk water intrusion issue that is the cause of visible biological growth and in compliance with the most current Incidental Repair program notice (WPN 19-5 at the time of this guidance).

Prohibited:

- Using DOE WAP H&S funds for mold cleanup.
- Using DOE WAP H&S funds for window and door replacements.

Testing/Inspection

Required:

- Visual assessment for moisture or mold damage including exterior drainage.

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Allowable:

- Diagnostics such as material moisture content, or relative humidity measurements at the audit and/or final inspection.

Prohibited:

- Using DOE WAP H&S funds for mold testing of any type.

How do you define “minor” or allowable moisture-related measures, and at what point is work considered beyond the scope of weatherization?

- Minor repairs are repairs that do not exceed \$1000.
- Where severe mold and moisture issues cannot be addressed, deferral is required.
- Mold cleanup is not an allowable H&S cost.
- Surface preparation where weatherization measures are being installed (e.g., cleaning mold off window trim in order to apply caulk) must be charged as part of the ECM, not to the H&S budget category.

Client Education

Occupant Education

Required:

- Provide occupant written notification of identified mold/moisture hazards and information regarding the associated hazard.

Training

- National curriculum on mold and moisture or equivalent.
- How to recognize drainage issues.

7.17 – Pests

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☒ Alternative Guidance ☐ Results in Deferral ☐

Funding

DOE ☒ LIHEAP ☐ State ☐ Utility ☐ Other ☐

What guidance do you provide Subgrantees for dealing with pests and pest intrusion prevention in homes slated for weatherization?

Action/Allowability

Required:

- Deferral of homes where infestation of pests cannot be reasonably removed or poses H&S concern for workers.

Allowable:

- Limited pest removal is allowed only where infestation would prevent weatherization.
 - Limited pest control is defined as pest control that does not exceed \$1000.
- Screening of windows and points of access and incorporating pest exclusion into air sealing
- practices to prevent intrusion.

Define Pest Infestation Thresholds, Beyond Which Weatherization Is Deferred

- Infestation of pests may be the cause for deferral where it cannot be reasonably removed or poses H&S concern for workers.
- Pest control that exceeds \$1000 is beyond the scope of WAP

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Testing Protocols

Testing/Inspection

Allowable:

- Visual assessment of presence and degree of infestation and risk to worker.

Client Education

Required:

- Inform occupant in writing of observed conditions and associated risks.

○

Training

- How to assess presence and degree of infestation, associated risks, and deferral policy.

7.18 – Radon

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☒ Alternative Guidance ☐ Results in Deferral ☐

Funding

DOE ☒ LIHEAP ☐ State ☐ Utility ☐ Other ☐

What guidance do you provide Subgrantees around radon?

Action/Allowability

Required (when applicable):

- Cover exposed dirt floors within the pressure/thermal boundary with a sealed soil gas retarder
- Cover sump well/pits with airtight covers
- Implement ventilation as required by ASHRAE 62.2-2016

Allowable:

- In homes where radon may be present, work scope may include additional precautionary measures based on EPA Healthy Indoor Environment Protocols for Home Energy Upgrades.
- Other precautions may include, but are not limited to, sealing any observed floor and/or foundation penetrations, isolating the basement from the conditioned space, and ensuring crawl space venting is installed and operable.
- Minor repairs of existing radon mitigation systems that does not exceed \$1000.
 - All radon mitigation system repairs must be approved by DHCD.
 - Additional license(s) and certification(s) may be required to service radon mitigation systems in Virginia

Prohibited:

- Using DOE WAP H&S funds to install new radon mitigation.

○

Testing Protocols

Prohibited:

- The use of DOE WAP H&S funds for radon testing.

Client Education

Occupant Education

U.S. Department of Energy
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Required:

- Provide all occupants EPA's A Citizen's Guide to Radon and inform them of radon related risks.
- Occupants must sign an informed consent form prior to receiving weatherization services.
- While radon testing is not an allowable expense subgrantees must notify the homeowner(s) and/or occupant(s) about the low-cost radon tests kits available from the Virginia Department of Health, <https://www.vdhradon.org/>

○

Training and Certification Requirements

- Auditors, assessors and inspectors must have knowledge of radon, what it is and how it occurs including what factors may make radon worse and precautionary measures that may be helpful.
- Workers must be trained in proper vapor retarder installation.

Documentation Requirements

7.19 – Safety Devices: Smoke and Carbon Monoxide Alarms, Fire Extinguishers

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☒ Alternative Guidance ☐ Results in Deferral ☐

Funding

DOE ☒ LIHEAP ☐ State ☐ Utility ☐ Other ☐

What is your policy for installation or replacement of the following:

Action/Allowability

Required:

- Install CO alarms in every home where alarms are not present or are inoperable in compliance with ASHRAE 62.2-2016 which references NFPA 720 (note: NFPA 720 has been incorporated into NFPA 72).

Allowable:

- Install smoke alarms where the AHJ requires them if alarms are not present or are inoperable.
- Replace functional smoke alarms and carbon monoxide alarms if they are beyond the manufacturer's stated lifetime (usually 10 years).
- Replace functional smoke or CO alarms batteries if designed to be replaceable.
- Provide fire extinguishers where solid fuel burning equipment is present.
- CO and smoke alarms with strobe lights or other features are allowable for client with documented disabilities.

Prohibited:

- Using DOE WAP H&S funds for replacement of functional smoke or CO alarms that are not beyond the manufacturer's stated lifetime.

Testing Protocols

Required:

- Verify operation and age of installed alarms.
-

Client Education

Required:

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- Provide occupant with verbal and written information on use of newly installed devices and the potential risks of not properly maintaining these devices.

○

Training

- Where to install alarms.
- Local code compliance.

7.20 – Occupant Health and Safety Concerns and Conditions

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☒ Alternative Guidance ☐ Results in Deferral ☐

Funding

DOE ☒ LIHEAP ☐ State ☐ Utility ☐ Other ☐

What guidance do you provide Subgrantees for soliciting the occupants' health and safety concerns related to components of their homes?

Action/Allowability

Required:

- When a person's health may be at risk and/or WAP work activities could constitute an H&S hazard, the occupant is required to take appropriate action based on severity of risk.
- Deferral, if occupant risk cannot be mitigated.

Allowable:

- Occupant temporary relocation costs on a *case-by-case* basis.
- Subgrantees must obtain written permission from DHCD prior to relocating occupant.
- Occupant(s) must have medically documented health risk.
- Up to 3 nights in a hotel/motel at the GSA per diem rate
- Meals for three days for occupant(s) at the GSA approved rate.
- Subgrantees are required to submit receipts to DHCD.

Testing/Inspection

Required:

- Screen occupants for known or suspected health concerns either as part of initial application for weatherization, during the audit, or both.

o This is done utilizing the “Occupant Pre-existing or Potential Health Condition Screening

Form” required by [WPN 22-7](#).

○

What guidance do you provide Subgrantees for determining whether occupants suffer from health conditions that may be negatively affected by the act of weatherizing their home?

- When a person's health may be at risk and/or WAP work activities could constitute an H&S hazard, the occupant will be required to take appropriate action based on severity of risk.
- Failure or the inability to take appropriate actions must result in a deferral.

What guidance do you provide Subgrantees for dealing with potential health concerns when they are identified?

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- How to assess occupant preexisting conditions and determine what action to take if the home is not deferred.
- Awareness of potential hazards.

Client Education

Required:

- Inform occupant in writing of any known risks and provide pre-weatherization screening form.
- Provide occupant with Subgrantee point of contact information in writing.

○

Documentation Form(s) have been developed and comply with guidance? Yes ☐ No ☒

7.21 – Ventilation and Indoor Air Quality

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☒ Alternative Guidance ☐ Results in Deferral ☐

Funding

DOE ☒ LIHEAP ☐ State ☐ Utility ☐ Other ☐

Identify the Most Recent Version of ASHRAE 62.2 Implemented (optional: identify Addenda used)

Action/Allowability

Required:

- Install ventilation as required by ASHRAE 62.2 - 2016. If occupant refuses ventilation as required by ASHRAE 62.2, the home must be deferred.

○ .

Testing and Final Verification Protocols

Required:

- ASHRAE 62.2 evaluation to determine required post-weatherization ventilation.
- Measure fan flow of existing fans and of installed equipment to verify performance
-

Client Education

Required:

- Provide occupant with information on function, use, and maintenance (including location of service switch and cleaning instructions) of ventilation system and components.
- Provide occupant with equipment manuals for installed equipment.
- Include disclaimer that ASHRAE 62.2 does not account for high polluting sources or guarantee indoor air quality.

○

Training

- ASHRAE 62.2 training, including proper sizing, evaluation of existing and new systems.

7.22 – Window and Door Replacement, Window Guards

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☒ Alternative Guidance ☐ Results in Deferral ☐

Funding

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DOE ☒ LIHEAP ☐ State ☐ Utility ☐ Other ☐

What guidance do you provide to Subgrantees regarding window and door replacement and window guards?

- o Window and door replacements are **not** an allowable H&S expense.
- o Window or door repairs **are** an allowable H&S expense **If** the measure meets the following:
 - o The measure resolves a bulk water intrusion that is actively causing visible signs of biological growth.
 - Clear written explanation of the repair must be in the energy audit.
 - Clear before and after photos must be retained in the client file.
- o Window or door repairs must be considered ancillary or Incidental Repairs if they do not meet these requirements. (See WPN 19-5 for the definition of both “Ancillary” and “Incidental” measures.)

Testing Protocols

N/A

Client Education

- o Provide written information on lead risks whenever issues are identified.

Training

- o Awareness of guidance

7.23 – Worker Safety (OSHA, etc.)

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☒ Alternative Guidance ☐ Results in Deferral ☐

Funding

DOE ☒ LIHEAP ☐ State ☐ Utility ☐ Other ☐

How do you verify safe work practices? What is your policy for in-progress monitoring?

Action/Allowability

Required:

- Adherence to all federal, state, and local worker safety regulations (e.g., OSHA, EPA).

Allowable:

- *Minor* repairs and installations (e.g., repairing stairs, replacing handrails, etc.).
- Equipment purchases to protect the health and safety of the worker (e.g., Personal Protective Equipment (PPE), jobsite cleaning supplies)
 - Minor repairs are those that do not exceed \$1000

Prohibited:

- Using DOE WAP H&S funds for *major* repairs.
- Testing/Inspection

Allowable:

- Environmental and surveillance testing required by OSHA regulation.

Occupant Education

- Not applicable.

Training and Certification Requirements

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- Use and importance of PPE
- Safety training appropriate for job requirements, OSHA 10 hour training meets this requirement.
- Ongoing training as required in Hazard Communication Program.

7.24 –

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☐ Alternative Guidance ☐ Results in Deferral ☐

Funding

DOE ☒ LIHEAP ☐ State ☐ Utility ☐ Other ☐

Remediation Protocols

Action/Allowability

Allowable:

- *Limited case-by-case* replacement of water heaters if the water heater poses a life-safety risk to occupants (e.g., leaking primary tank, high CO measurements).
- *Minor* safety repairs of water heaters (e.g., T&P valve piping, backflow prevention devices, expansion tanks).
 - Minor repairs must not exceed \$1000
- Replace, repair, or install primary water heater heaters when existing primary water heater is unsafe, inoperable, or nonexistent.

Testing Protocols

Required:

- Visual inspection of all water heaters and related piping for safety and leaks
- See *Combustion Appliances* section for related combustion safety testing requirements.

Client Education

Required:

- Appropriate use and maintenance of units.
- Provide all paperwork and manuals for any installed equipment.
- Where combustion equipment is present, provide combustion safety and hazards information including how to recognize depressurization, dangers of CO poisoning, and fire risks associated with combustion appliance use.

Training

7.24 –

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☐ Alternative Guidance ☐ Results in Deferral ☐

Funding

DOE ☐ LIHEAP ☐ State ☐ Utility ☐ Other ☐

Remediation Protocols

Testing Protocols

Client Education

Training

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V.8.1 Overview and Organization

DHCD falls under the Secretary of Commerce and Trade. The Department has a Director, a Chief Deputy Director, Seven Deputy Directors for the following divisions: Eviction Building and Fire Regulations, Economic Development and Community Vitality, Broadband, and Community Development and Housing. Additionally, the department has an

The Division of Community Development and Housing has five units: Community Development, Homeless and Special Needs Housing; Energy Efficiency; Outreach, Planning; and Efficiency division.

Nine full-time staff are assigned to the WAP with the intention of expanding that number. A small number of other permanent and non-permanent positions provide administrative support depending on the DOE and LIHEAP allocation.

V.8.2 Administrative Expenditure Limits

Policy on Administrative Expenditure Limits

In accordance with WPN 25-1, DHCD allocates at least 7.5% of the 15% administrative funds from DOE to the subgrantees based on budget requests from the agencies. If the request for funding on the agencies' requirement for administrative funds. Once budgets are received, the percentages that were derived from the allocation formula (based on a grant of less than \$350,000.00, DHCD will allow requests for administrative funds up to the 15% maximum for the grant.

Approval of additional administrative funds (over the typical 7.5%) would be based on an agency (subgrantee) submitting an official letter signed by the Executive Director stating the need for less than \$350,000 to use up to an additional 5 percent of such grants for administration if the State has determined that such recipient requires such additional amount for

NOTE: The result of approval of additional administrative funds would put the state overall above the 15% administration threshold as the State would retain its 7.5% share of

Program Income

Any program income earned must be used to complete additional units. Property owner contributions (landlords) and leveraged resources (utility or state funds) are not considered program income, in which case they could be added to the total appropriated funds to determine overall administrative costs. DOE defines program income as any funds earned by the program that must be used to complete additional dwelling units in conformance with DOE rules, regulations, and guidance.

V.8.3 Monitoring Activities

Technical monitors are completing in person monitoring. Financial & Administrative monitoring will be completed by DHCD Housing Program Analyst and/or the Weatherization Field Monitor, who is also a certified Quality Control Inspector. Seven percent of the T&TA budget is dedicated to salary and fringe for our Technical Monitor and administrative support category primarily through the personnel and travel budget sections.

The comprehensive monitoring will include the following areas and details:

Technical Monitoring

- Program Overview (Client File Review, Work Orders, etc.)
- Equipment/Inventory/Materials
- Eligibility
- Rental Units
- Client Feedback
- Energy Audits

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- Field Work
- Health & Safety
- Quality Assurance
- Training & Technical Assistance
- Qualifications & Training
- Weatherization of Unit
- Final Inspections

Financial and Administrative Monitoring

- Financial Management/Accounting Systems and Operations
- Client File Review/ Eligibility
- Administrative Management
- Single Audits
- Payroll/Personnel
 - Timesheets
 - Signed Job Descriptions
- License Review
 - Agency Contractors License
 - RBEA License
- Other Programs' Monitoring Reports
- Program Policies
 - Utility programs
 - Deferral/denial/referral policies
- Insurance Policies
- Lease Agreements
- Vehicle Mileage Logs
- Board Overview
 - Board Bylaws
 - List of Board Members
 - Board Meeting Minutes
- Contractor Management

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- Contractor List
- Solicitation of Contractors
- RFP Review
- Contractors' License Certifications
- Agreements
- Financial Policies and Procedures Manual (With special attention to the following:)
 - Property Management
 - Records Retention
 - Conflict of Interest
 - Procurement
 - Indirect Cost Rate/Cost Allocation Plan
 - Debarment and Suspension
- Bank Account Signature Cards
- Credit Card Statements
- Detailed Expense Reports

DHCD will complete reviews based on the method of QCI implementation the subgrantee selects. This would be either 5% or 10% of each subgrantee's completed permits, in order to assess: quality and compliance; appropriate and allowable materials; appropriateness and accuracy of energy audits (no missed opportunities); and factors that are relevant to onsite work.

If significant deficiencies are discovered, such as health and safety violations, poor quality installation of materials, major measures missed, DHCD will require the subgrantee to provide additional training to augment potential weak areas discovered in subgrantee monitoring. When a subgrantee has significant deficiencies, the Program may make monitoring more frequent.

Quality Work Plan (WPN 22-4 Requirements)

Virginia administers the requirements of the Quality Work Plan by utilizing the Grantee-Developed QCI policy. Each subgrantee will have the option to utilize the same person as the Auditor/QCI to perform weatherization work on the dwelling. Each subgrantee will select their method prior to beginning of the Program Year.

If the subgrantee selects to utilize the same person as the Auditor/QCI for any amount of jobs, 10% of their jobs will be monitored by the State. If the subgrantee chooses the Independent option, 10% of their jobs will be monitored by the State.

If at some point, if the Independent option is not feasible, the agency will be categorized in the 10% category for monitoring purposes. An agency may select to move to the 5% category if independent inspection cannot be performed. Virginia has worked with several states/training centers to align our field guide with the standard work specifications (SWS) in an impartial manner and in accordance with the QCI requirement.

Tracking and Analysis

All the results of subgrantee monitoring, including, financial reviews, will be tracked by DHCD to final resolution. The tracking record will include: findings, concerns, and resolutions. Annually, DHCD will summarize each financial review, program monitoring reports, and any outstanding issues and develop a subgrantee monitoring summary. The summary must be considered during annual planning and will be available for the PO to review during Grantee on-site monitoring visits.

DHCD utilizes a standardized QCI final inspection checklist that aligns with the Standard Work Specifications. This checklist is providing opportunities to evaluate the same QCI form on monitoring inspections to provide accurate and timely feedback to the subgrantees in a impartial and complete manner. DHCD has coordinated a compliance with the monitoring amounts.

Exit Interview

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After the monitoring review is completed, DHCD will brief the subgrantee on the observations and findings generated by the monitoring visit through an exit briefing. Subgrantee to immediately resolve the issues. Sensitive or significant noncompliance findings, such as waste, fraud, or abuse will be reported to DOE immediately. In subgrantee that describes the current monitoring assessment (identify any findings, concerns, recommendations, commendations, and best practices) and any correcti visits at a subgrantee) will be reported immediately to the PO.

Compliance Report

A Monitoring report will be completed and submitted to the agency's Executive Director within thirty days after the visit, and a copy will be forwarded to the Weatl corrections.

Risk Assessment

In the fall of 2017, in accordance with 2 CFR 200, DHCD implemented a department-wide Risk Assessment process for all federally funded programs.

Prior to each monitoring visit, a risk assessment is performed by DHCD personnel to determine the potential risk to the program, as well as the department. During t timeframe the subgrantee is required to receive technical and training assistance and/or a monitoring visit by DHCD standards. There are four levels of risk determin most severe level of risk requires monitoring as soon as possible, and no later than six months; immediate technical assistance is necessary. All WAP subgrantees an

V.8.4 Training and Technical Assistance Approach and Activities

Training and Technical Assistance (T&TA) Activities: T&TA activities are intended to maintain or increase the efficiency, quality and effectiveness of the Weatl

Training plan:

DHCD is proactive in responding to recommendations from all levels of monitoring to include DOE, State audits and contracted QA reviews. DHCD has implemente interchange in the summer of 2025. The training center constantly has in-person and online Weatherization courses and provides on site technical assistance at the sta staff will also continue.

Maintaining workforce credentials:

DHCD utilizes Energy Solutions, a nationally-accredited IREC training center that DHCD has partnered with and funded for years. Energy Solutions tracks credentia requirements.

DHCD currently offers all levels of training for technical staff through Energy Solutions, Virginia's WTC, the following is the required training based on the employee

The Quality Control Inspector must hold and maintain the Quality control Inspector certification form the date of hire. The QCI certification must be renewed every

Required for WAP Retrofit Installer Technicians (Crew Workers) (required within 6 months of date of hire):**

- HEP* Retrofit Installer Technician (RIT) course
- Lead Safe Weatherization (LSW) course
- OSHA 10 or 30 or equivalent safety course

Required for WAP Crew Leaders (required within 9 months of date of hire):**

- HEP* Retrofit Installer Technician (RIT) course
- Lead Safe Weatherization (LSW) course
- OSHA 30 or equivalent safety course
- HVAC Fundamentals course
- HEP* Crew Leader course

Required for WAP Energy Auditors (required within 12 months of date of hire):**

- HEP* Retrofit Installer Technician (RIT) course
- Lead Safe Weatherization (LSW) course
- OSHA 10 or OSHA 30 equivalent safety course

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- HVAC Fundamentals course
- ASHRAE 62.2 course
- HEAT software course
- HEP* Energy Auditor course

Required for WAP Quality Control Inspectors:

- Lead Safe Weatherization (LSW) course
- OSHA 10 or OSHA 30 equivalent safety course
- HEP* Quality Control Inspector certification

Required Lead training:

- Lead Safe Weatherization (LSW). DOE's WPN 17-7 mentions Lead Safe Weatherization (LSW) is no longer required to comply with DOE. However, Virginia requires training.
 - Weatherization crewmember and subcontractors operating in one of the aforementioned job roles modifying any of the following will be subject to LSW: doors, door trim, floors, fireplaces, radiators and other heating units, shelves, shelf supports, stair treads, stair risers, stair stringers, newel posts, railing columns, beams, bathroom vanities, counter tops, and air conditioners; and exterior components such as: painted roofing, chimneys, flashing, gutters and downspouts, lattice work, railings and railing caps, siding, handrails, stair risers and treads, stair stringers, columns, balustrades, windowsills or stools and troughs, caulking.
 - Subcontractors performing duties not related to job roles are not be required to attend LSW training but must be supervised by the subgrantee's EPA I
 - Renovation, Repair and Painting (EPA RRP rule). At least one WAP crew worker, crew leader and/or sub-contractors working on Weatherization or LIHEAP jobs must be certified to prevent work stoppage due to lack of compliance. This person must be physically present at the work site when signs are posted, while work is being performed.
- (ii) On or after April 22, 2010, no firm may perform, offer, or claim to perform renovations without certification from EPA under §745.89 in target housing or child-care facilities.
- (3) Individuals . On or after April 22, 2010, all renovations must be directed by renovators certified in accordance with §745.90(a) and performed by certified renovators. A renovation qualifies for one of the exceptions identified in §745.82(a) or (c).

Visit <http://www.epa.gov/lead/pubs/renovation.htm#contractors> for details.

Required OSHA training:

- All WAP employees and subcontractors working on Weatherization and LIHEAP jobs must provide proof of OSHA or OSHA-equivalent training.***

Required Licensing & Credentialing:

- All WAP Energy Auditors must be individually licensed by the Virginia Department of Professional and Occupational Regulation (VADPOR) as Residential Building Energy Analysts.
- Licensed Energy Auditors must work for firms registered with VADPOR to conduct Residential Building Energy Analysis OR hold \$100,000 in general liability insurance that must be renewed in accordance with DPOR regulations.
- All WAP Quality Control Inspectors (QCI) must hold a valid BPI HEP QCI certification as of July 1, 2015. The license must be renewed in accordance with BPI regulations.
- Agencies must have a Master HVAC-licensed individual on staff or utilize a subcontractor with this license when repairing or replacing heating and cooling systems.
- WAP Energy Auditors must hold a BPI Multifamily Building Analyst certification in order to audit large multifamily projects (4 stories+). The license must be renewed in accordance with BPI regulations.

*HEP stands for Home Energy Professional. These courses meet the Job Task Analysis (JTA's) for the specific job roles being performed and are accredited by the National Home Energy Rating Council (NHERC).

**Timeframe allowed for training is reduced when employee is elevated to higher classification. (i.e. Trained Crew Worker promoted to Crew Leader will be given 6 months of training).

***OSHA-equivalent training will be approved by DHCD on a case-by-case basis. It is the responsibility of the subgrantee to provide proof of equivalency i.e. certification from OSHA or OSHA-equivalent training.

Visit <https://www1.eere.energy.gov/wip/guidelines.html> for details.

Currently DHCD utilizes the financial/administrative monitoring to assess the technical assistance needs of the financial and administrative staff and provides that training to the network. (See schedule)

Peer Exchanges are held by the Association of Energy Conservation Professionals.
Interchanges are held by DHCD.

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Weatherization Assistance Program (WAP)
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Grant Number: SE0001857, **State:** VA, **Program Year:** 2025
Recipient: Virginia, Commonwealth of

Additionally, DHCD has contracted the Virginia Community Action Partnership (VACAP) to hold a Weatherization Program Management summit in February of 2025:

2025:

- February Program Management Summit with VACAP
- June Technical Interchange
- Fall Peer Exchange with AECF
- Ongoing Individual Program Management Mentoring through VACAP

2026:

- February Program Management Summit with VACAP
- June Technical Interchange
- Fall Peer Exchange with AECF
- Ongoing Individual Program Management Mentoring through VACAP
-

Other meetings are scheduled as needed.

DHCD analyzes the effectiveness of each subgrantee during all levels of monitoring and looks at the energy savings each year using DOE's energy savings calculation information. Client education is a part of the curriculum required for all staff members working on jobs.

Contractor Training Stipend

- Licensed contractors interested in providing Weatherization services through sub-grantees, are eligible for a travel and training stipend of \$100.00 per day per
- Sub-grantees are responsible for submitting invoices for sub-contractor training and travel stipends
- Sub-grantees are responsible for retaining stipend receiving sub-contractors for a period of one year after training is provided at a service value equal to cumul

Percent of overall trainings

Comprehensive Trainings:	80.0
Specific Trainings:	20.0

Breakdown of T&TA training budget

Percent of budget allocated to Auditor/QCI trainings:	70.0
Percent of budget allocated to Crew/Installer trainings:	25.0
Percent of budget allocated to Management/Financial trainings:	5.0

V.9 Energy Crisis and Disaster Plan

Participation in the LIHEAP CRISIS Program is encouraged. Approximately one-third of the subgrantees currently participate on a regular basis, through contracts or referrals.

Disaster Relief (in accordance with Program Notice 12-7)

The use of DOE WAP funds is limited to eligible weatherization activities and the purchase and delivery of weatherization materials.

Use of DOE WAP Funds to address disaster related hazards

Allowable expenditures under WAP include the following:

- 1) the cost of incidental repairs to an eligible dwelling unit if such repairs are necessary to make the installation of weatherization materials effective and,
- 2) the cost of eliminating health and safety hazards, elimination of which is necessary before the installation of weatherization materials (10 CFR 440.18(d)(9); 10 CFR 440.

To the extent that the services are in support of eligible weatherization (or permissible re-weatherization¹) work, such expenditure would be allowable. For example, debris not to be weatherized would not be an allowable cost.

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Weatherization personnel can be paid from DOE funds to perform functions related to protecting the DOE investment. Such activities include securing weatherization materials in the initial phase of the disaster response.

Using DOE funds to pay for weatherization personnel to perform relief work in the community as a result of a disaster is not allowable. Local agencies may use weatherization Assistance Regulations 10 CFR Part 600.

In the event of a declared Federal or State disaster, weatherization crews may return to a unit reported as a completion to DOE that has been "damaged by fire, flood or act of God to be re-weatherized, without regard to date of weatherization". 10 CFR 440.18(f)(2)(ii). Local authority or other form of compensation.

Reprioritization of weatherization requests coming from the disaster area WAP rules require that priority be given to identifying and providing weatherization assistance to the most vulnerable households (10 CFR 440.16(b)). However, it would be permissible to consider in households located in the disaster area, as a priority as long as the households are eligible and the assistance is needed as a result of damage incurred from the disaster.