

KANSAS HOUSING

State of Kansas Weatherization State Plan Application 2020

**Kansas Housing Resources Corporation
611 S. Kansas Avenue, Suite 300
Topeka, KS 66603-3803
(785) 217-2001 / FAX (785) 232-8084
www.kshousingcorp.org**

Application for Federal Assistance SF-424			
*1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		*2. Type of Application: * If Revision, select appropriate letter(s): <input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation *Other (Specify): _____ <input type="checkbox"/> Revision	
* 3. Date Received: 12/12/19		4. Applicant Identifier:	
5a. Federal Entity Identifier:		*5b. Federal Award Identifier: DE-EE0007920	
State Use Only:			
6. Date Received by State: 12/12/19		7. State Application Identifier: 2020 DOE Grant	
8. APPLICANT INFORMATION:			
*a. Legal Name: KANSAS HOUSING RESOURCES CORPORATION			
*b. Employer/Taxpayer Identification Number (EIN/TIN): 710950729		*c. Organizational DUNS: 137043662	
d. Address:			
*Street 1: _____ 611 S Kansas Avenue _____ Street 2: _____ Suite 300 _____ *City: _____ Topeka _____ County/Parish: _____ Shawnee County _____ *State: _____ Kansas _____ Province: _____ *Country: _____ U.S.A _____ *Zip / Postal Code: _____ 666033803 _____			
e. Organizational Unit:			
Department Name: Community Solutions		Division Name:	
f. Name and contact information of person to be contacted on matters involving this application:			
Prefix: _____ Middle Name: _____ *Last Name: _____ Reimler _____ Suffix: _____		*First Name: _____ Christine _____	
Title: Community Solutions Director			
Organizational Affiliation:			
*Telephone Number: (785) 217-2023		Fax Number: 785-256-9479	
*Email: creimler@kshousingcorp.org			

Application for Federal Assistance SF-424

9. Type of Applicant 1: Select Applicant Type: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

*Other (Specify)

***10 Name of Federal Agency:**

U.S. Department of Energy

11. Catalog of Federal Domestic Assistance Number:

81.042 Weatherization Assistance for Low-Income Persons

CFDA Title:

***12 Funding Opportunity Number:**

DE-WAP-0002020

*Title:

2020 Weatherization Assistance Funding Opportunity

13. Competition Identification Number:

Title:

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

State of Kansas

***15. Descriptive Title of Applicant's Project:**

The Weatherization Assistance Program enables low-income families to permanently reduce their energy bills by making their homes more energy efficient. During the past 43 years, the U.S. Department of Energy's (DOE) Weatherization Assistance Program has provided weatherization services to more than 7.4 million low-income families.

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
*a. Applicant: Kansas Congressional District 02	*b. Program/Project: KS-Statewide
Attach an additional list of Program/Project Congressional Districts if needed.	
17. Proposed Project:	
*a. Start Date: 07/01/2020	*b. End Date: 06/30/2021
18. Estimated Funding (\$):	
*a. Federal	\$ \$3,291,592.00
*b. Applicant	\$ _____
*c. State	\$ _____
*d. Local	\$ _____
*e. Other	\$ _____
*f. Program Income	\$ _____
*g. TOTAL	\$ \$3,291,592.00
*19. Is Application Subject to Review by State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on _____ <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
*20. Is the Applicant Delinquent on Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes", provide explanation and attach.	
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 comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U. S. Code, Title 218, Section 1001) <input checked="" type="checkbox"/> ** 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 specific instructions.	
Authorized Representative:	
Prefix: _____ Mr. _____	*First Name: _____ Ryan _____
Middle Name: _____	
*Last Name: _____ Vincent _____	
Suffix: _____	
*Title: Executive Director	
*Telephone Number: (785)217-2001	Fax Number: (785)232-8084
* Email: rvincent@kshousingcorp.org	
*Signature of Authorized Representative: Signed Electronically	*Date Signed:

IV. WEATHERIZATION ANNUAL FILE

IV.1 SUBRECIPIENTS

Allocation of funds to Subrecipients and across budget categories will be calculated on the base formula as available from KHRC. The base formula is based on the 2014-2018 American Community Survey 5-year Estimates. KHRC retains the right to actively manage the grant and move funds as necessary to fully expend the monies during the budget period.

Subrecipient Agency	Type of Organization	Tentative		Congressional District
		Allocation	Units	
Community Action, Inc. 455 SE Golf Park Blvd Topeka, KS 66605-2862 (Contractors)	Local Community Action Agency	\$314,746	31	Dist. 2, 100%
East Central Ks Economic Opportunity Corporation P.O. Box 40, 1320 S. Ash Street, Ottawa, KS 66067-0040 (Contractors)	Local Community Action Agency	\$864,894	90	Dist. 1, 19% Dist. 2, 62% Dist. 3, 13% Dist. 4, 6%
North Central Regional Planning Commission P.O. Box 565, 109 North Mill Beloit, KS 67420-0565 (Contractors)	Unit of Local Government	\$443,969	45	Dist. 1, 98% Dist. 2, 2%
South Central Ks Economic Development District 9730 E. 50 th St. North Bel Aire, KS 67226 (Contractor and Crew)	Nonprofit Organization	\$1,293,403	134	Dist. 1, 47% Dist. 2, 15% Dist. 4, 38%
TOTAL ESTIMATED COST AND UNITS		\$2,917,012	300	

IV.2 WAP PRODUCTION SCHEDULE

	Annual Total
Weatherized Units (TOTAL)	300
Reweatherized Units	0

Vehicles and Equipment \$5,000 or more Average Cost per Dwelling Unit (DOE Rules)

A. Total of Vehicles and Equipment (\$5,000 or more) Budget	\$0.00
B. Total Units to be Weatherized, from Production Schedule above	300
C. Units to be Reweatherized, from Production Schedule above	0
D. Total Units to be Weatherized, plus Planned Reweatherized Units from Production Schedule above (B plus C)	300
E. Average Vehicles and Equipment Cost per Dwelling Unit (A divided by D).....	\$0.00

Average Cost per Dwelling Unit (DOE Rules)

F. Total of Funds for Program Operation	\$1,979,432
G. Total Units to be Weatherized, plus Planned Reweatherized Units from Production Schedule above (total from D above)	300
H. Average Program Operations Costs per Unit (F divided by G)	\$6,598.11
I. Average Vehicles and Equipment Acquisition Cost per unit (total from E)	\$0.00
J. Total Average Cost per Dwelling Unit (H plus I)	\$6,598.11

The PY 2020 average expenditure limit is \$7,669 per Weatherization Program Notice 20-1, effective date of December 11, 2019 and shall be the maximum average expenditure allowed. For planning purposes an average of \$6,600 will be used which is closer to historical state averages.

IV.3 ENERGY SAVINGS

K-WAP will utilize the DOE algorithm to estimate energy savings for 2020. The DOE algorithm is based on the most recently published evaluation of the Weatherization Assistance Program, specifically the report “Weatherization Works- Summary of Findings from the Retrospective Evaluation of the U.S. Department of Energy’s Weatherization Assistance Program”, ORNL/TM-2014/338, which estimates annual savings of 29.3 MBtu per year for natural gas heated homes. The study includes site-built weatherized homes nationwide (which include single-family homes and buildings with 1-4 units, but excludes mobile homes and large multifamily). This value is representative of the total energy savings expected from weatherization for an average house from the fuel used for space heating (natural gas, propane, fuel oil, and electricity), which may include water heating too, and the source value of the electricity savings for the home (from space heating, space cooling, water heating, lighting, refrigerators, etc.).

DOE Program	Amount	Line
Total Estimated Homes to be Weatherized	300	(a)
Multiply (a) by 29.3 MBtu for Total Annual Estimated Energy Savings resulting from DOE appropriated funds	8790MBtu	(b)

IV.4 DOE-FUNDED LEVERAGING ACTIVITIES

For the current Program Year, KHRC will not be engaging in any DOE funded leveraging activities.

Other Funding Sources

For the current Program Year, KHRC will receive 15 percent of the State of Kansas LIEAP allocation. The LIEAP funds are used according to DOE rules, with the exception of additional measures as identified in the Weatherization Subrecipient’s Procedures Manual. (Revision date: 2020)

IV.5 POLICY ADVISORY COUNCIL

The purpose of the Policy Advisory Council (PAC) is to serve in an advisory capacity to the Kansas Housing Resources Corporation in the administration and development of the Weatherization Assistance Program. PAC members assist the program by bringing special qualifications, professional and personal networking, and sensitivity with respect to solving the problems of low-income persons across the state. Membership can include organizations, agencies, programs, and individuals that broadly represent low-income persons within our target populations.

The K-WAP is assisted by the Kansas Weatherization Policy Advisory Council. The members of the Council are as follows:

Name & Mailing Address

Lynn Retz

Constituent Affiliation – Kansas Corporation
Commission (State Energy Office)
1500 SW Arrowhead Rd
Topeka, KS 66604

Maria Lopez

Constituent Affiliation - Evergy (utility
company, representing energy users)
1200 Main St,
Kansas City, MO 64105

Dorothy Barnett

Constituent Affiliation – Climate + Energy
Project.
P.O. Box 1858
Hutchinson, KS 67504

Kimberly Bailey

Constituent Affiliation – Evergy (utility
company, representing energy users)
818 S. Kansas Ave
Topeka, KS 66612

David Carter

Constituent Affiliation – K-State Engineering
Extension-Kansas Energy Program
2323 Anderson, Suite 300
Manhattan, KS 66502

Scott Anglemeyer

Constituent Affiliation – Representing low to
moderate income families including elderly,
handicapped, and Native Americans.
KACAP
455 SE Golf Park Blvd.
Topeka, KS 66605

Brian Dreiling

Constituent Affiliation –Midwest Energy (utility
company, representing energy users)
1330 Canterbury Dr.
Hays, KS 67601

Hilary Lukens

Constituent Affiliation – Representing low income
families, LIEAP customers.
Kansas Dept. Children and Families
500 SW Van Buren
Topeka, KS 66603

IV.6 HEARING AND TRANSCRIPTS

On January 8, 2020, Weatherization Grantee and Subrecipient Weatherization Directors discussed focus areas of review for the 2020 State Plan Application during a quarterly Weatherization Directors' Meeting.

The Kansas Register ran the Notice for Public Meeting on January 30, 2020. On February 13, 2020, a public hearing was held to gather input from the general public on the development of the 2020 State Plan. The public hearing transcript is attached.

Weatherization Subrecipients and PAC members were emailed the draft proposal on March 24, 2020 and a meeting with these stakeholders was held on April 7, 2020 (PENDING) to discuss the proposed changes to the State Plan and to gather their input.

The Kansas Register ran the Notice for Public Hearing on April 2, 2020. The Public Hearing was held on April 15, 2020 (PENDING). The Public Hearing transcript is attached. No additional comments were received.

IV.7 MISCELLANEOUS

In 2019, DOE WAP utilized the American Customer Satisfaction Index (ACSI) to survey Grantees and Subrecipients. The intent of the survey was to provide the WAP network with a mechanism for improving program management and delivering maximum benefits to WAP clients. KHRC took the results of the ACSI and created a PY2020 ACSI Action Plan. This document will be attached to the SF-424.

“Recipient Business Officer”: Christine Reimler, 785-217-2023, creimler@kshousingcorp.org
“Recipient Principal Investigator”: Scott Kuhn, 785-217-2048, skuhn@kshousingcorp.org

V. WEATHERIZATION MASTER FILE

V.1 ELIGIBILITY

V.1.1 Approach to Determining Client Eligibility

Definition of income used to determine eligibility:

Renters or homeowners whose income is at or below 200 percent of the poverty level, determined in accordance with criteria established by the Director of the Office of Management and Budget, shall be eligible for weatherization assistance in Kansas. In addition, households which contain a member who has received cash assistance payments under Title IV or XVI of the Social Security Act or applicable state or local law during the 12-month period preceding the determination of eligibility for weatherization assistance shall be eligible for weatherization assistance.

Household Eligibility:

A dwelling unit shall be eligible for weatherization assistance if it is occupied by an eligible family unit whose income is at or below 200 percent of the poverty level and the structure is eligible as outlined in V.1.2 Approach to Determining Building Eligibility.

Qualified Aliens Eligibility for Benefits:

Subrecipients shall ensure that DOE weatherization services shall only be provided to eligible populations. All client files will contain an Eligibility Certification statement as found in the Kansas Subrecipient Procedures Manual. Subrecipients are directed to review <https://www.acf.hhs.gov/ocs/resource/liheap-im-hhs-guidance-on-the-use-of-social-security-numbers-ssns-and-citizenship-status-verification>.

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation:

The applicant must provide evidence or income documentation satisfactory to the outreach worker that the household meets the eligibility requirements. The documentation must be maintained in the client file and made available for inspection by the agency employee and state staff. Applicant income must be verified for the one-year period prior to the certification month. Income data for a part of a year may be annualized in order to determine eligibility—for example, by multiplying by four the amount of income received during the most recent three months. The method of calculation is to be determined by the Subrecipient in accordance with WPN 20-3 and the Subrecipient Procedures Manual and should be uniformly applied. Applications on file for one year or more must be recertified for the year prior to pre-inspection. Applicant eligibility verification shall be documented in the file and shall include, as a minimum, (1) which 12-month period was considered, (2) a list of all sources of applicant income, (3) documentation of income from each source for the period(s) being considered, and (4) the date and initials of the agency employee verifying income.

Tax forms may be used to verify income only if the certification period is from January through December. Certification of self-employed individuals will include the use of a notarized statement

declaring their income for the previous 12 months. Applicants who have undocumented or zero income must provide a notarized statement declaring their income, or lack thereof, for the previous 12 months.

Reweatheringization:

No dwelling unit may be weatherized (1) which is designated for acquisition or clearance by a federal, state or local program within 12 months from the date weatherization would be scheduled to be completed; or (2) which has been weatherized since September 30, 1994. An exception is allowable for a unit, which has been weatherized since September 30, 1994, if it has been damaged by fire, flood or act of God and repair of the damage to weatherization materials was not covered by insurance.

Dwelling units partially weatherized under this program or under other federal programs during the period September 30, 1975 through September 30, 1994 may receive further assistance for weatherization. Homes which are eligible for reweatherization under 10 CFR 440.18(e) (2) may be reweatherized at the discretion of the Subrecipient weatherization director. Subrecipients are instructed not to repeat weatherization measures which were previously completed unless those measures are no longer effective. All reweatherized units must meet current weatherization standards on completion. The state will assure through monthly review of production that reweatherizations do not exceed ten percent of the state's completed dwelling units. Reweatheringizations have averaged less than one percent over the past three years.

In the event of a natural disaster which results in damage to low-income homes, Subrecipient and state staff will evaluate the damage to determine the appropriate role for the Weatherization Assistance Program in relief efforts. See section V.8.

During scheduled on-site monitoring visits, K-WAP staff reviews a sample of client files to assure they were eligible for weatherization. In addition, K-WAP staff reviews annual Subrecipient CPA reports for findings related to ineligible units. In each case, the K-WAP recoups weatherization funding for ineligible units.

Eligible Structures:

Every dwelling weatherized must meet both the client eligibility and the building eligibility requirements. Eligible structure types include: single family, manufactured housing, multifamily buildings, and shelters.

Structures are ineligible for weatherization grant funds if they are condemned, scheduled for demolition, or designated for acquisition or clearance by a Federal, State, or local program within twelve months from the date of weatherization scheduled completion.

Structures will be assessed for compliance with the State Historic Preservation Office (SHPO) Programmatic Agreement (PA). Weatherization services or select measures may not be eligible on certain homes as identified by a Section 106 review.

Structures will be assessed to ensure that weatherization measures will be effective. The expected lifetime of measures and their benefit will be taken into consideration when assessing structure eligibility. Conditions which constitute such limitations may include, but are not limited to:

- If remodeling or rehabilitation of the property (either planned or in progress) is substantial enough to degrade the effectiveness of weatherization.
- If the conditions of structural or mechanical systems of the home are such that it is not safe and possible to install or complete core measures; i.e., furnace safety and efficiency inspections and repair, blower door guided envelope air sealing, insulation.
- If it is not possible to improve the condition of the structure sufficiently to allow the installation of the core measures with the maximum \$500 for incidental repair, or with coordinated rehabilitation funding.
- If, at a minimum, health and safety items cannot be addressed.

If conditions exist which preclude the weatherization of the structure, a brief written description of the conditions should be supplied to the client. This notification should be coupled with the notification that weatherization assistance is postponed or deferred until such time that the problem conditions have been resolved. The agency should inform the client of a “reasonable” amount of time for the resolution of the problem conditions. The client will also be informed of their right to appeal the deferral. See Deferral Standards.

Subrecipients will exercise caution in dealing with non-traditional type dwelling units to ensure that they meet program regulations on whether the unit is, in fact, eligible. The weatherization of non-stationary campers and trailers that do not have a mailing address associated with the eligible applicant is not allowed. The use of a post office box for non-stationary campers or trailers does not meet this requirement.

Rental Units:

Renter occupied housing units are eligible for weatherization services if they meet all other eligibility requirements. Signed permission from the owner of each eligible dwelling unit must be obtained and documented in the client file prior to performing any inspections, tests, or weatherization measures on a dwelling. Rent to own and contract for deed arrangements shall be considered rental properties.

K-WAP does not require landlord contributions to provide weatherization services. However, funding restrictions (i.e. excessive health and safety or incidental repairs, or other funding limitations) may require a landlord contribution to allow comprehensive weatherization work to proceed. Landlord contributions should be sought for the weatherization of multifamily complexes to maximize the benefits to the low-income clients and to stretch limited WAP funding, when feasible.

In compliance with 10 CFR 440.22, the following procedures shall be used in the weatherization of rental dwellings:

1. Subrecipients shall use the financial assistance guidelines for dwelling units to determine eligibility.

2. Subrecipients shall obtain a signed agreement (Landlord Rental Agreement) from the owner/landlord of the building or his designated agent authorizing the work to be done and, if applicable, agreeing to the landlord's financial participation in weatherization costs. Subrecipients should develop a detailed description of the weatherization measures authorized and costs assigned to the landlord and the agency. Rents shall not be raised solely due to the weatherization assistance provided under this part. The agreement shall include a provision that the landlord agrees not to raise the rent for at least one year from the time the work is completed, unless raising the rent is based on factors unrelated to the weatherization improvements. The client shall be provided a copy of the signed agreement. The K-WAP will not use a lien on landlord property.
3. In order to weatherize an entire multi-family building, the building must have at least 66 percent program eligibility rate (50 percent duplex or four-plex) including those units that will become eligible within 180 days under a federal, state or local government program for rehabilitating the building or making similar improvements to the building. On a case-by-case basis, with prior approval from DOE, certain eligible types of large multi-family buildings may be eligible for weatherization if as few as 50 percent of the units were certified as eligible for weatherization. This exception applies only to those large multi-family buildings where an investment of DOE funds would result in significant energy-efficiency improvement because of the upgrades to equipment, energy systems, common space, or the building shell.
4. The maximum amount of grant funds which can be spent for multifamily weatherization is determined the same way as in single-family owner-occupied units, which is by managing the average cost per unit. For reporting purposes, all units receiving weatherization must be reported as "completed units."
5. Approved measures that are applicable to multi-family units should be assessed, prioritized and implemented in an energy savings/cost effective manner appropriate to the particular building.
6. A building which is totally vacant may be weatherized only in conjunction with a federally funded rehabilitation project, and with the assurance that at least 66 percent of the units will be leased to income eligible tenants. If the building is partially occupied, vacant units may be weatherized if 66 percent of the total units are occupied by eligible tenants.
7. No undue or excessive enhancements shall accrue to the value of weatherized dwelling units in Kansas. Weatherization measures to be completed on rental units, as on owner units, must be cost-effective, as determined by an individualized REM/Design audit. The state may recoup costs of excessive weatherization measures.
8. Subrecipients shall document how the benefits of weatherization services accrue primarily to the low-income tenants residing in the rental unit if the tenants do not directly pay their own primary heating bill. Examples and guidance can be found in WPN 16-5.
9. Subrecipients shall include in their rental agreements the address and telephone number of the Legal Aid Society office(s) serving their areas, as well as a statement that Legal Aid is responsible for arbitrating landlord-tenant disagreements arising from weatherization activities completed on the units.

10. Shelters are eligible for weatherization activities, as follows:

- a. “Shelter” is defined as a dwelling unit or units whose principal purpose is to house on a temporary basis individuals who may or may not be related to one another and who are not living in nursing homes, prisons or similar institutional care facilities.
- b. For the purpose of determining how many dwelling units exist in a shelter, the minimum size for each dwelling unit within the shelter shall be 800 square feet of living space, or each floor of the shelter may be counted as a dwelling unit.

Deferral Standards:

Deferral may be necessary if health and safety issues cannot be adequately addressed through this guidance. The decision to defer work in a dwelling is difficult but necessary in some cases. This does not mean that assistance will never be available, but that work must be postponed until the problems can be resolved and/or alternative sources of help are found. In the judgment of the Subrecipients, which include crews and contractors, any conditions that exist, which may endanger the health and/or safety of the workers or occupants, should be deferred until the conditions are corrected. Deferral may also be necessary where occupants are uncooperative, abusive, or threatening. Crews and contractors are expected to pursue all reasonable options on behalf of the client.

Subrecipients will develop guidelines and a standardized form for such situations.* The form will include the client’s name and address, dates of the audit/assessment and when the client was informed, a clear description of the problem, conditions under which weatherization could continue, the responsibility of all parties involved, and the client(s) signature(s) indicating that they understand and have been informed of their rights and options and have the opportunity to appeal. All deferred weatherization applications and jobs shall be entered into the Hancock system and the corresponding deferral reason selected from the available options.

*Disclaimer notices are currently in place for lead paint, mold, asbestos, hazard identification, occupant pre-existing or potential health conditions, and radon.

Deferral conditions may include:

1. The client has known health conditions that prohibit the installation of insulation and other weatherization materials.
2. The building structure or its mechanical systems, including electrical and plumbing, are in such a state of disrepair that failure is imminent and the conditions cannot be resolved cost-effectively.
3. The house has sewage or other sanitary problems that would further endanger the client and weatherization installers if weatherization work were performed.
4. The house has been condemned or electrical, heating, plumbing, or other equipment has been “red tagged” by local or state building officials or utilities and cannot be remedied by weatherization funds.
5. Moisture problems have developed signs of mold.

6. Dangerous conditions exist due to high carbon monoxide levels in combustion appliances, and cannot be resolved under existing health and safety measures.
7. The client is uncooperative, abusive, or threatening to the crew, subcontractors, auditors, inspectors, or others who must work on or visit the house.
8. The extent and condition of lead-based paint in the house would potentially create further health and safety hazards.
9. If, in the judgment of the energy auditor, any condition exists which may endanger the health and/or safety of the work crew or subcontractor, the work should not proceed until the condition is corrected.
10. The property has vermiculite insulation that will be disturbed.
11. The property has suspected asbestos containing materials in less than good condition or where the material is non-intact or where the material may be disturbed.
12. The utilities to the property have been disconnected by the utility company.
13. The combined price of required H&S measures exceeds the average H&S expenditure to the extent that the agency cannot balance the expenditure to maintain the required H&S percentage. In this instance, the agency may defer the home until additional funds are located to lower the expenditure to within the average.
14. The property is currently listed for sale and/or the eligible occupant will be moving.
15. The property has a significant remodel in progress.

V.1.3 Definition of Children

The State of Kansas has defined “children,” in terms of prioritizing households including children, as those 18 years old and under. Data are compiled in age groups of 0-2, 3-5, 5 and under, and 6-18 years of age.

V.1.4 Approach to Tribal Organizations

In accordance with federal rule, the State of Kansas recommends that tribal organizations not be treated as local applicants eligible to submit an application to operate a Weatherization Assistance Program. Native Americans will receive assistance as eligible individual applicants under program guidelines.

V.2 SELECTION OF AREAS TO BE SERVED

Each Subrecipient listed in this application is a public or private nonprofit agency, including Community Action Agencies (CAAs), units of local government, and an economic development district.

Each existing Subrecipient was selected initially by criteria set forth in 10 CFR 440.15. (See map of areas attached.) Every year an analysis is completed on each Subrecipient's performance, including the review of monitoring visits and resolution of findings, production reports, expenditures in relationship to units completed, the quality of weatherization services provided, annual CPA audit reports, and general staff observations from interactions with Subrecipient staff and clients. On the basis of each Subrecipient's performance, a written closeout report is issued each year, requiring responses to noncompliance issues.

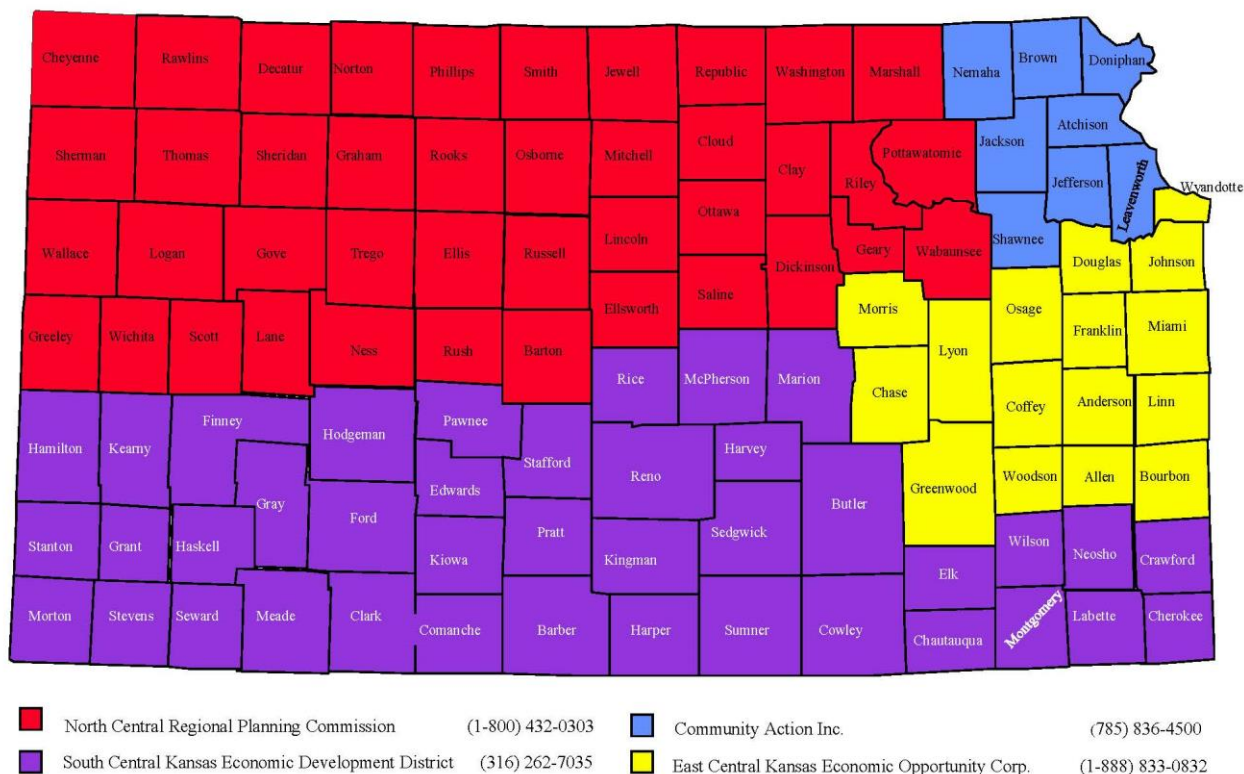
The WAP Subrecipient Procedure Manual describes procedures for the state's response to Subrecipient noncompliance, including recoupment or reduction of funding, subgrant probation, and subgrant termination.

The entire geographical area of the Grantee shall be served by the Weatherization Assistance Program. This requirement will be accomplished with a combination of DOE and other funds, as available, and may require multiple program years.

Allocation of funds to Subrecipients and across budget categories will be based on the base formula as available from KHRC. The base formula is based on the 2014-2018 American Community Survey 5-year Estimates.

Redistribution Provision: If Subrecipients are unable to expend their funds in a timely manner, KHRC/K-WAP retains the right to allow for re-allocation of funds to Subrecipients and across budget categories using the same formula as originally proposed or any other funding plan that meets the needs of targeted Kansas citizens without holding additional public hearings. Active management and re-allocation of the grant allows the grant to be fully expended during the budget period.

Counties Served by Kansas Weatherization Assistance Program



V.3 PRIORITIES

K-WAP and Kansas weatherization Subrecipients give priority to three groups of households: those with low-income elderly clients, those with low-income clients who have disabilities, and those with low-income families with children 18 years of age or under. The weatherization Subrecipients seek actively and aggressively to identify the households, which include these priority groups. Their outreach methods include media advertising, networking with Area Agencies on Aging, the Kansas Department of Children and Families, homeless shelters, public housing authorities, other providers, and word of mouth. Subrecipients market their services in key locations where low-income residents are provided services.

Subrecipients have developed procedures for serving clients by priority. These priorities include:

1. Elderly persons (age 60 or over)
2. Persons with disabilities (any individual who has a physical or mental disability which constitutes or results in a substantial handicap to the individual's employment; or a person who has a record of having, or is regarded as having, a physical or mental impairment which substantially limits one or more of the individual's major life activities; or someone who has a disability which would make the individual eligible to receive disability insurance benefits or

supplemental security income from the Social Security Administration or developmentally disabled assistance from the Department of Health and Human Services)

3. Families with children 18 years old or under

Emergencies may take precedence over all other priorities. Emergencies are defined as life-threatening housing conditions, and they shall be documented as such in client files.

The timing of service to an applicant that is in a priority category may be set so services can be coordinated with another funding source.

Taking into consideration the above priority groups, subrecipients are encouraged to direct services to those geographic regions that did not receive weatherization benefits in the previous program year.

Weatherization Subrecipients are sensitive to the issues of high-energy burden and high residential fuel usage. The State of Kansas is working with other agencies to establish these categories for use in identifying priorities. Until a uniform standard is developed, high energy burden and high energy users will not be a priority for eligibility.

V.4 CLIMATIC CONDITIONS

The National Oceanic and Atmospheric Administration's account of climatic conditions from the National Climatic Data Center reported that Kansas' 30-year average (1981-2010) heating degree days was 5,159 and its average cooling degree days was 1,359. The data file is attached for four representative weather stations. Based on the cooling degree-days, the state has approved specific cooling measures which are determined cost-effective by the REM/Design audit. The REM/Design audit utilizes the four provided climatic zones across Kansas to factor in climatic variances within the state.

V.5 TYPE OF WEATHERIZATION WORK TO BE DONE

V.5.1 Technical Guides and Materials

Prioritization of weatherization measures to be performed on a dwelling unit have been established according to 10 CFR 440.21, Standards and Techniques for Weatherization. Energy audits will be conducted on each dwelling unit covered by the state's weatherization program.

Weatherization measures approved in Kansas, as justified by an individualized REM/Design audit, H&S policy, or GHW list, include:

1. Diagnostic combustion appliance testing.
2. Measures to reduce infiltration.
3. General heat waste measures: water heater tank wrap, water heater pipe insulation on the first six feet, water pipe insulation in unconditioned areas, low-flow faucet aerators, low flow showerheads, replacement of furnace or air conditioner filters, and duct sealing and insulation when located outside the thermal boundary.
4. Installation of a smart thermostat.
5. Necessary repairs or replacement of primary heating unit.

6. Installation of attic insulation up to R-38.
7. Installation of dense-pack wall insulation.
8. Installation of floor insulation up to R-30.
9. Installation of interior or exterior storm windows over single-glazed, loose fitting primary windows.
10. Installation of wire or fabric sunscreen.
11. General cooling measures; including, air conditioning replacement.
12. Installation of other measures necessary to protect installed weatherization materials.
13. Necessary health and safety repairs.
14. Installation of LED lamps and fixtures
15. Refrigerator replacement.
16. Installation of primary windows and exterior grade doors.
17. Necessary repairs or replacement of water heater.
18. Installation of foundation wall and rim and band insulation up to R-19.
19. Slab edge insulation up to R-10.

All weatherization materials must meet the latest standards for weatherization as published in 10 CFR 440 Appendix A. Additional materials that are approved for use that are not included in Appendix A are LED lamps and fixtures and refrigerators. Subrecipients shall give preference in their purchases to products containing the highest level of recovered or recycled materials practicable.

In accordance with WPN 15-4, all measures installed will meet the objectives and desired outcomes of the Standard Work Specification as adopted and outlined in the Kansas SWS Field Guide and accompanying Supplemental Specifications for Manufactured Housing. All work must also be performed in accordance to the DOE approved energy audit procedures and 10 CFR 400 Appendix A.

The current SWS field guide for single family structures is approved for use through June 21, 2021. The supplemental guide for manufactured housing is approved for use through December 10, 2022. KHRC will update and align the single-family field guide with the current SWS standards for this housing type during PY2020. The updated Kansas SWS Field Guide will be submitted to DOE for review and acceptance during the first few months of 2021. The SWS field guide for single family structures is followed for small multifamily projects.

These documents currently contain the language for all the desired outcomes, specifications, and objectives required to complete weatherization work on single family and manufactured homes. These standards shall also apply to the small garden style multifamily buildings common to the state. A digital, dated version of the field guide and supplement has been provided to all Subrecipients and is available for all contractors and the public on the KHRC Weatherization Website: <https://kshousingcorp.org/forms>

Supporting photographs and how-to practices for specifications will be updated on an ongoing process and provided as new dated versions of the guide on the website.

Proposed changes and clarifications should be submitted to KHRC. All SWS primary language updates will be reviewed and incorporated on an annual basis. Annual and critical updates will be communicated with an effective date to all Subrecipients for distribution to crews and contractors.

All Grantee and Subrecipient agreements and vendor contracts will contain language which clearly communicates the expectation for quality work and the requirement to be in compliance with the Kansas SWS Field Guide. A signed contract that includes confirmation of receipt and understanding shall be sufficient and binding.

Activities or projects not included in the list of Categorical Exclusion activities in Section 2.9 of WPN 20-1 will require a NEPA environmental questionnaire submission for review.

V.5.2 Energy Audit Procedures

K-WAP has received DOE's (5) year audit approval and it is valid through February 26, 2021. To allow time for the development, submission, and approval, KHRC has begun work to update energy audit procedures to align with WPN 19-4. The target date for submitting updated procedures to DOE for review and acceptance is August 1st, 2020.

In no case may a weatherization energy conservation measure (ECM) be installed that shows an SIR of less than 1.0, with the sole exceptions of top plane air sealing and or manufactured home duct boot and trunk sealing which will be eligible if the cumulative house SIR package is equal to or greater than 1.0. Subrecipients must also demonstrate good judgment in determining the appropriateness of some measures that show an SIR of 1.0 or above, assuring they manage to the average cost per unit, and balancing between providing more services to fewer households and providing appropriate services to more households.

Multi-family units comprise a smaller percentage of eligible units within Kansas, with the majority of these units being small complexes. Small multi-family buildings are buildings with 25 dwellings or fewer per building and units must be individually heated and/or cooled. These individually heated units will be modeled in REM/Design as individual units using the same field auditing and modeling procedures as detached single-family units. Large multifamily buildings (26+ units) or those buildings with a shared heating/cool systems may be weatherized on a case-by-case approval by DOE. The audit and assessment procedures must be appropriate to the dwelling type and each audit and all supporting documentation will be submitted to the DOE Project Officer for pre-approval.

<u>Unit Types</u>	<u>Audit Procedures and Dates Most Recently Approved by DOE</u>
Single-Family	REM/Design audit (February 26, 2016)
Manufactured Housing	REM/Design audit (February 26, 2016)
Small Multi-Family	REM/Design audit (February 26, 2016)
High Rise/Large Multi-Family	On a case by case DOE approval basis

V.5.3 Final Inspection

No dwelling unit may be reported to the Department of Energy as completed until the Subrecipient, or its authorized representative, has conducted a final inspection and certified that applicable work has been completed in a professional manner and in accordance with the priority determined by the audit procedures. Final inspections shall include post-weatherization blower door tests, mechanical inspections, and worst-case draft tests.

Every DOE WAP unit reported as a completed unit must receive a final inspection ensuring that all work meets the minimum specifications as outlined in the Kansas SWS Field Guide. The individual

who performs this final inspection shall be a certified Home Energy Professional Quality Control Inspector (QCI). Every client file must have a form that certifies that the unit had a final inspection and that all work met the required standards. The form must be signed by a certified QCI. The inspection must include an assessment of the original audit and confirm that the measures called for on the work order were appropriate and in accordance with K-WAP procedures.

To meet the Quality Work Plan inspection requirement, every agency shall have on staff a certified QCI. Additional WAP inspection staff are encouraged to work towards QCI certification. Where or when an agency does not have a certified QCI on staff to meet the requirement or inspection demands, a contracted certified QCI may be used with the written approval from KHRC. This contracted QCI may be an independent contractor or an arrangement with a network certified QCI may be established. All certified QCI inspectors working within K-WAP must maintain a valid copy of their certification with KHRC.

Due to the size of many Subrecipient agencies, the desire to have a completely independent QCI may not be realistic. It will be acceptable to have the same individual conduct the audit and perform the final inspection. However, the final inspector shall not be involved in any of the actual work on the home. Because this model does not allow for an independent review of the audit on every home, the percentage of monitoring shall be at least 10 percent.

A part of monitoring will be to ensure that final inspectors are QCI certified and are inspecting to the Kansas SWS Field Guide. Inspectors found not upholding the high quality of work expectations and standards will be written up. Corrective action plans will be required to be developed and implemented and will be tracked to resolution.

V.6 WEATHERIZATION ANALYSIS OF EFFECTIVENESS

Subrecipient effectiveness is assessed through multiple measures. Onsite monitoring requirements, as described in V.7.3 Monitoring Activities, provide ideal conditions during which Subrecipients may be evaluated and areas in need of improvement can be identified. In addition to the formal monitoring reporting that tracks deficiencies and findings and outlines how to make improvements, monitoring visits allow for a comprehensive review of the agency. Such review may include technical and financial systems and procedures, follow up on previous training outcomes and identification of future training needs, and the sharing of “Best Practices” at all levels of operation.

Monthly desk top budgetary reviews enable the grantee to analyze Subrecipient performance and productivity on an ongoing basis.

The K-WAP air sealing effectiveness is calculated using data provided from pre- and post-blower door measurements. This analysis provides K-WAP with information on each agency and weatherization auditor which allows staff to identify significantly high and/or significantly low performers. K-WAP staff analyzes the data for T&TA purposes that allows them to compare effectiveness within a Subrecipient’s area and between Subrecipients. The need for additional T&TA may be identified through these comparisons.

T&TA funds are made available and utilized throughout the K-WAP network to allow for continuous improvement. For current certified inspection staff, the use of continuing education units (CEUs) are used to maintain certification and to ensure on-going acquisition of knowledge and information about

new procedures, materials, and trends. The specific certification will dictate the CEU requirements (i.e. BPI Energy Auditor requires 24 CEUs over 3 years).

Each Subrecipient is provided an annual award closeout report that is an analysis of their performance and effectiveness. The report may include the review of monitoring visits and resolution of findings, production reports, expenditures in relationship to units completed, the quality of weatherization services provided, annual CPA audit reports, general staff observations from interactions with Subrecipient staff and clients, the number of counties served, and agency average cost expenditures as compared to entire state averages. This annual review allows Grantee staff to review and compare Subrecipients' productivity and effectiveness.

Success Stories - Each agency will be expected to develop a total of two "success stories" that occurred throughout the Program Year. The story should be accompanied with pictures of the dwelling or work in progress and if at all possible the unit's resident. KHRC can be contacted for the appropriate consent forms for potential written publication and use of the picture(s).

V.7 HEALTH AND SAFETY

See attached health and safety plan template.

V.8 PROGRAM MANAGEMENT

V.8.1 Overview and Organization

In 1992, the Kansas Weatherization Assistance Program was located in the Housing Development Division, of the Kansas Department of Commerce & Housing. In 2003, the State of Kansas Governor's Executive Reorganization Order created a stand-alone agency. The agency is now the Kansas Housing Resources Corporation (KHRC), effective July 1, 2003. A KHRC organization chart is attached.

As well as the Weatherization Assistance Program, the KHRC administers the HOME, Community Services Block Grant (CSBG), Emergency Solutions Grant (ESG), and Low Income Housing Tax Credit (LIHTC); Section 8 Housing projects, and the State Housing Trust Fund. The K-WAP has developed mutually beneficial relationships with HOME program modules, ESG, and LIHTC.

The K-WAP also obtains client information and shares data with the Low-Income Energy Assistance Program (LIEAP), located in the Kansas Department of Children and Families, in an effort to target the users who utilize the utility assistance program. A distinct agency, the Kansas Corporation Commission, houses the Energy Division, funded by the State Energy Program.

V.8.2 Administrative Expenditure Limits

The State of Kansas shall not exceed the ten percent maximum administrative allocation. The K-WAP shall not exceed the five percent maximum and its Subrecipient agencies shall not exceed the remaining five percent administrative allocation. To ensure the compliance of the 10 percent maximum federal mandate, K-WAP has written policies and procedures which require that K-WAP costs are monitored and maintained against the approved agency budget. All costs are reviewed and

approved by the program director or fiscal officer prior to authorization to expend funds. Subrecipient administrative costs are controlled by the approved budget and narrative, which is a part of the signed grant agreement. All administrative costs which are determined unallowable, as a result of a resolved agency or CPA audit, shall be recouped by the K-WAP.

An exception to exceed the ten percent total administrative requirement shall apply to Subrecipients funded at less than \$350,000 of DOE funds. Subrecipient agencies are required to submit justification for administrative funds in excess of five percent of the total grant, with state approval based on the individual Subrecipient needs.

V.8.3 Monitoring Activities

In accordance with 10 CFR 440, K-WAP has the responsibility to perform monitoring and oversight of the program implementation and work performed by all its Subrecipients. This responsibility includes ensuring that grant funds are expended in accordance with applicable law, including regulations contained in 10 CFR 440; applicable OMB circulars, Financial Assistance regulations 2 CFR 200 and 2 CFR 910; Weatherization Program Notices, and other procedures that DOE may issue. The purpose of monitoring will be to assure weatherization programs are being managed within federal and state guidelines and that eligible low-income families are receiving high-quality and appropriate weatherization of their homes. Approximately 35% of the Grantee T&TA funds will be allocated for program oversight and travel by state monitors. The remaining T&TA budget will be used for onsite training, mandatory trainings, trainers, or passed down to Subrecipients for approved individual T&TA activities. Additional funding sources may be utilized for special T&TA or monitoring activities as needed.

To fulfill this requirement K-WAP will conduct comprehensive monitoring of each Subrecipient at least once a year, utilizing the following approach:

A. Approach:

1. Programmatic and Management Monitoring

- a. K-WAP staff will conduct a programmatic and management review during annual one to three-day on-site compliance monitoring visits utilizing the Programmatic and Management Compliance Monitoring Instrument found in the WAP Subrecipient Procedure Manual. Monitoring will be completed by the Weatherization Program Manager or Field Specialist.
- b. Training and Technical Assistance will be provided as identified as needed or as requested during this monitoring visit.

2. Subrecipient Production Monitoring

- a. Subrecipient and home inspection monitoring will be conducted during one- to four-day on-site visits by the Weatherization Field Specialist or Program Manager. All grantee field monitoring will be performed by a certified Quality Control Inspector (QCI). For larger subrecipients several visits may be needed. K-WAP will inspect a minimum of ten percent of completed homes, filling out a Home Inspection Monitoring Instrument

(see WAP Subrecipient Procedure Manual) for all homes inspected. Monitoring forms will certify that all work met the required standards and will be signed by the QCI. A signed and dated form stating the above will be made part of the permanent client file. In progress units will be monitored annually.

- b. The effectiveness, safety, workmanship, overall appearance, and compliance with field standards will be evaluated during the monitoring visit.
- c. Dwelling units inspected will be selected from a list of reported projects that will allow a comprehensive sample.
- d. Inspection visits may focus on problem areas identified in previous monitoring reports to ensure that problems have been corrected.
- e. Units which demonstrate satisfactory completion of weatherization measures and compliance with the SWS specifications will be identified as “Pass” units; those units in which weatherization measures were completed but could have benefitted by “Best Practices” or other recommendations will be identified as “Pass with Comments” and T&TA or suggestions for the future will be made. Units on which weatherization measures either were not completed, were completed unsatisfactorily, or not in compliance with the SWS specifications will be identified as “Rework” units. If significant deficiencies are discovered, such as health and safety violations, poor quality installation of materials, or major measures missed, the Subrecipient will be required to take appropriate corrective action to resolve the outstanding issues in a timely manner. As a general rule, no additional DOE WAP funds can be charged for “Reworks” on homes that have already been reported to DOE as completed, weatherized units. “Reworks” identified on units that are reported as completed to DOE will be addressed on a case by case basis in accordance with WPN 11-3. Corrective action may require the removal of that unit from submitted reports or the use of non-DOE funds to correct the issue.
- f. Noncompliance items or issues not resolved may result in K-WAP’s recoupment of funds.
- g. Subrecipients receiving a high number of “Reworks” will be monitored more frequently and will have a higher percentage of homes examined until the Grantee can be assured that all deficiencies are resolved. Once procedures are in place to prevent reoccurrences, typical monitoring will resume.
- h. Contractors found to be repeatedly failing to perform adequately may be disqualified from future work if additional worker training fails to correct issues and concerns. Subrecipients will first contact underperforming contractors by telephone to try to resolve concerns. If concerns continue, the Subrecipient will initiate a written request for corrective action. Persistent concerns or deviations from specified requirements may result in withheld payments, contract probation, or contract termination.
- i. Training and Technical Assistance will be provided as identified as needed or as requested during this monitoring visit.

3. Financial Monitoring

- a. K-WAP staff will conduct a fiscal review during annual two- to three-day on-site compliance monitoring visits by the Fiscal Monitor, utilizing the Fiscal Monitoring Tool and the accompanying Fiscal Monitoring Guide as found in the Subrecipient Procedures Manual.
- b. Sensitive or significant noncompliance findings, such as waste, fraud, or abuse will be reported to DOE immediately.
- c. Issues not resolved may result in disciplinary action, included recoupment of disallowed costs, grant probation, or grant termination. See Subrecipient Procedures Manual: High Risk.
- d. Training and Technical Assistance will be provided as identified as needed or as requested during this monitoring visit.

4. K-WAP staff will review monthly financial and production reports for each agency.

- a. If irregularities or deviations from planned activities are found, K-WAP staff will contact Subrecipient agency staff for an explanation or correction. This contact will usually be by telephone or email first; if not resolved by telephone or email, K-WAP will initiate a written request for action.
- b. If irregularities or deviations occur over several months, K-WAP may withhold payments until they are corrected. Long-term irregularities or deviations from planned activities may result in grant probation and grant termination. See Subrecipient Procedures Manual: High Risk.
- c. Sensitive or significant noncompliance findings, such as waste, fraud, or abuse will be reported to DOE immediately.

5. K-WAP staff will review the latest financial audit of agency financial activities by the close of the program year.

- a. If the reports note program findings, K-WAP will require responses and, if appropriate, corrective action.
- b. Depending on the severity of any problems reported, a Subrecipient may receive a follow-up monitoring review, concentrating on prior deficiencies and required corrective actions.
- c. Issues not resolved in a timely manner may result in recoupment of disallowed costs, grant probation, and grant termination. See Subrecipient Procedures Manual: High Risk

- d. Sensitive or significant noncompliance findings, such as waste, fraud, or abuse will be reported to DOE immediately.

B. Exemplary Agencies. Previous guidance suspended the designation of “Exemplary” Subrecipients so this status will not be utilized.

C. Visit. Monitoring visits will be scheduled at the convenience of KHRC and the Subrecipient through written correspondence. After the monitoring review is complete, the monitor will brief the Subrecipient, usually through an exit briefing, on the observations and monitoring assessments generated by the monitoring visit. Any issues that present imminent danger to people will be discussed and must be resolved immediately.

Sensitive or significant noncompliance findings, such as waste, fraud, or abuse will be reported to DOE immediately.

Within 30 days after each visit, a written report will be prepared for the Subrecipient that describes the current monitoring assessment (identifying any findings, concerns, recommendations, commendations, and best practices) and any corrective actions, if applicable. The Subrecipient has the right to respond in writing and present additional supporting documentation, clarification, and information as to why a particular finding(s) should be waived. If necessary, the Subrecipient will have 35 calendar days to respond with an acceptable corrective action plan.

Subrecipient noncompliance or repeated unresolved findings may result in disciplinary action, including recoupment of disallowed costs, grant probation, or grant terminations. See Subrecipient Procedures Manual: High Risk. Noncompliance and unresolved findings will be reported to the DOE Project Officer.

D. Tracking and Analysis. Tracking and analysis of monitoring visiting will be conducted to ensure resolution and improvement. All corrective action items will be tracked to completion and will conclude with a close out letter.

Annually, K-WAP staff will summarize each of its Subrecipients’ reviews and monitoring reports to identify each Subrecipient’s needs, strengths, and weaknesses. The results of this monitoring analysis will be considered during annual planning and assessment of T&TA needs. An annual risk assessment of each Subrecipient will also be included the analysis.

E. Reporting. A narrative report including successes and significant problems will be reported to DOE in the T&TA, Monitoring, and Leveraging Report. This report will include at a minimum: the Subrecipients monitored, and major findings (waste, fraud, and abuse) and resolutions, trends with respect to findings, concerns, or other issues, needed T&TA, Subrecipients that are considered high risk and a corrective action plan, and outcome activities involving T&TA and monitoring training.

Monitoring Activities planned for the Program Year

A tentative monitoring schedule for the 2020 program year follows:

<u>Subrecipient</u>	<u>Date</u>
CAI	April 6-7
ECKAN	April 20-22s
NCRPC	May 4-5
SCKEDD	May 17-20

V.8.4 Training and Technical Assistance (T&TA)

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

T&TA funding will be available for Grantee and Subrecipient use. Funds may be used to pay salary, travel, and operational and contractual costs for monitoring, obtaining and maintain certifications, training, training support, and providing or receiving programmatic and technical assistance. T&TA funds may also be used to train contractors participating in the program provided a retention agreement is obtained.

The K-WAP will use the following methods to provide T&TA:

1. K-WAP staff will provide T&TA through onsite, written, and telephone communication with Subrecipient staff.
2. Staff will provide specific T&TA on automated audit inspection procedures as a regular component of the on-site Programmatic and Management and production monitoring visits.
3. K-WAP staff or contractor(s) will provide on-site or offsite T&TA as needed. Need may be identified by the Subrecipient staff, Grantee monitoring visits, QA review visits, DOE Project Officer monitoring visits, internal state audits, IG reports, or by K-WAP staff as the result of observation for resolution of problems, or to meet updates required by DOE.
4. K-WAP and Subrecipient staff will participate in national activities as they are planned. K-WAP will assure staff are able to attend these meetings and will encourage Subrecipient staff to take advantage of training opportunities by funding Subrecipient attendance with T&TA funds available to the K-WAP.
5. K-WAP staff will attend DOE mandated activities/events, NASCSP events, State Weatherization Directors' meetings, national DOE sponsored conferences, and other staff development trainings as needed or required. Continuing education and conference attendance ensure Grantee effectiveness in administering and implementing the grant.

6. Quarterly Weatherization Directors' Meetings will be scheduled to address areas of common concern with regard to training and policy for current initiatives and future program requirements. T&TA needs will be identified through feedback from the Subrecipients.
7. Annual subrecipient closeout reports compare subrecipient production numbers, expenditures, average cost per unit expenses, and H&S expenses to statewide averages. Unusually high or low expenditures will receive further review and may identify additional T&TA needs.
8. The K-WAP air sealing effectiveness is calculated using data provided from pre- and post-blower door measurements. This analysis provides K-WAP with information on each agency and weatherization auditor which allows staff to identify significantly high and/or significantly low performers. K-WAP staff analyzes the data for T&TA purposes that allows them to compare effectiveness within a Subrecipient's area and between Subrecipients. The need for additional T&TA may be identified through these comparisons.
9. Kansas requires successful completion of its certification training for all auditors and inspectors. The state allocates T&TA funds to each Subrecipient for the mandated trainings as needed. When a Subrecipient agency is unable to hire a certified weatherization auditor, the state will allow an on-boarding period, during which the new hire must complete his/her auditor certification requirements. See the Subrecipient Procedures Manual for more information. During the on-boarding period, all audits and inspections must be supervised by a certified weatherization auditor/inspector until training and certification requirements are met. Alternatively, an agency without a certified auditor/inspector may subcontract with a certified auditor/inspector. For current certified staff, use of continuing education credits to maintain BPI certification will be funded through T&TA funds.
10. Effectiveness of T&TA activities will be evaluated by formal evaluation forms completed by participants to statewide training workshops, state monitoring staff's observation and reporting of improvement in work standards and reporting, informal comments by workshop participants, agency directors, and others, and by disbursement of surveys to Subrecipients and contractors.
11. Annual training is provided on a variety of topics for the K-WAP network. Training is mandatory as announced. Annual training typically includes fiscal and technical training and may include training tracks at the annual Kansas Housing Conference. See below for additional annual activities.

In accordance with WPN 15-4 and Memorandum 034, T&TA activities for WAP field staff are to be designed as Comprehensive (Tier 1) or Specific (Tier 2) training. Comprehensive (Tier 1) training is comprehensive, occupation specific training which follows the curriculum aligned with the Job Task Analysis (JTA) for that occupation. Specific (Tier 2) training is issue specific, short-term trainings to address specific skills or tasks.

WAP field staff are only those technical staff members directly employed by Grantee and Subrecipient agencies, such as auditors, agency crew members, and inspectors. Contractors and contract auditors and inspectors are not explicitly included, but may be eligible for T&TA funded training as long as a retention agreement is obtained. Contracted installers are not to be considered part of WAP field staff for the purpose of targeted T&TA activities.

Comprehensive (Tier 1) training will be closely aligned with credentialing requirements for the given task (i.e. energy auditor or QCI). Auditor and QCI training will be based on a three-year training

cycle. Individualized training plans will be allowed to be structured in the manner best suited for each agency, but most plans will focus on receiving intensive 1-2 week trainings every three years. This time table is consistent and conducive to receiving intensive training in anticipation of recertifications exams. Comprehensive, (Tier 1) training for crew based Retrofit Installer/Technician and Crew Leaders will be provided to agency employed crew members within 18 months of hire and within every 5 years thereafter. There are no Retrofit Install/Technician or Crew Leader testing or certification requirements at this time. Specific (Tier 2) training will be obtained on an as-needed basis and on a rolling basis to fulfill certification CEU requirements.

Comprehensive (Tier 1) training must be provided by a DOE approved accredited training program. Currently, IREC accredited training centers are the only training centers that meet this requirement. Training will be provided by the contracted training provider in the manner best suited for the situation but will primarily be a hybrid of distance learning and in person training. Santa Fe Community College has become a valued IREC accredited training provider for the QCI certification and will be a K-WAP recommendation for Comprehensive (Tier 1) training.

Specific (Tier 2) training will be provided on an as-needed basis. The specific need and technical expertise required will determine the training provider. State technical staff or network partners such as the Kansas Building Science Institute (KBSI) can provide specialized and short-term training. Attendance in specialized training is mandatory as announced. Non-compliance may result in elevated risk status, state certification suspension, or contract termination.

Client education has been provided over the years by different methods in each area of the state, ranging from detailed discussions with clients during pre- and post-inspections to access to program-related publications and handouts. As the program has become more technology-oriented, state staff encourages Subrecipient staff to use the technology to demonstrate energy-saving techniques and to explain the outcome of poor energy habits and bad energy decisions. Training related to lead-based paint hazards and radon will be on-going to meet DOE requirements. A quarterly module-training format has worked well for Kansas's T&TA activities. The state will continue to build its training plan in quarter modules, with efforts to avoid major disruptions during peak production months.

Tentative activities planned for the 2020 Program Year follow:

First Quarter (July- September):

- | | |
|---|------------------------------|
| • Kansas Weatherization Directors' Meeting | July 22, 2020 |
| • Kansas Housing Conference | August 26-28, 2020 |
| • NASCSP Annual Conference | September 28-October 2, 2020 |
| • QCI/Energy Auditor Certification, as needed | |

Second Quarter (October — December):

- | | |
|--|------------------|
| • Kansas Weatherization Directors' Meeting | October 21, 2020 |
| • On-site T&TA, as needed | |
| • Inspector's Retreat | TBA |
| • Retrofit/Installer Training, as needed | TBA |

Third Quarter (January — March):

- NASCSP Winter Conference TBA
- Kansas Weatherization Directors' Meeting January 13, 2021
- On-site T&TA, as needed
- Kansas State Plan Development Meetings Jan/Feb 2021
-

Fourth Quarter (April — June):

- PAC Meeting April 2021
- Kansas Weatherization Directors' Meeting April 2021
- On-site T&TA, as needed
- Inspector's Retreat - May 2021

Estimated breakdown of activities planned:

Percent of overall training:

- Comprehensive Trainings: 32% Pending Updates
- Specific Trainings: 68%

Breakdown of T&TA training budget:

- Percentage of budget allocated to Auditor/QCI trainings: 57%
- Percentage of budget allocated to Crew/Installer trainings: 11%
- Percentage of budget allocated to Management/Financial trainings: 32%

V.9 ENERGY CRISIS AND DISASTER RESPONSE PLAN

The K-WAP allows a great deal of flexibility in its program under normal operation. An energy crisis offers Subrecipients the opportunity to use existing procedures to prioritize weatherization for households with no heating unit, households with unusually high energy costs, households with certain health and safety problems, or households with other emergencies such as extremely leaky homes.

During an energy crisis, K-WAP Subrecipients may consider any household an emergency that has no working furnace or whose furnace is tested unsafe, or that demonstrates its energy costs constitute a high burden, or whose energy consumption is unusually high. Classification as an emergency enables a Subrecipient to place that household at the top of the list for weatherization services.

As an emergency, the K-WAP Subrecipient may make emergency repairs, including furnace replacement and repair of serious air leaks, and schedule other needed repairs at a later date. If at all possible, the Subrecipient should complete the emergency units within the current program year. If it is not possible, however, the state will work with the Subrecipient agency to assure the work can be completed during the following program year.

The state will allow Subrecipients to purchase or lease temporary heating sources for use in energy crises. Subrecipients may use program funds for storage of the units and to increase liability insurance, as needed. Subrecipients will be responsible for maintaining the safety of the units.

As needed, the state may redirect funds from T&TA to provide additional allowable measures required to meet an energy crisis.

Kansas General Disaster Response Plan (Reference WPN 12-7):

Policy: For weatherization purposes, a disaster is determined by a Presidential or Gubernatorial order declaring either a Federal or State Emergency. The crisis may be naturally occurring or man-made and generally will involve at least three phases: the crisis itself, the clean-up, and the rebuilding of the affected area. It is not uncommon for weatherization work to be suspended during the crisis and early clean-up phase until basic community services such as electricity, water, food and medical supply activities can be returned closer to normal.

The disaster time period may be from several days to a month or more and this period can have a critical impact on program operations.

This “General Disaster Response Plan” addresses the needs of the affected low-income clients and also takes into consideration the limited funds available in weatherization.

Procedures:

- 1. General Disaster Response Plan:** A General Disaster Response Plan will include:
 - a. contact and coordination with the appropriate disaster site leadership in charge to explain the role and resources that weatherization can provide;
 - b. availability and use of grantee and/or local agency staff, equipment and resources;
 - c. consideration for the preservation of local agency (Subrecipient) weatherization files, records, materials and equipment if they would be at risk.
- 2. Notify A DOE Project Officer As Soon As Possible Regarding the Disaster:** Contact DOE staff by telephone, then provide a follow-up in writing (email is fine). Discussion by telephone allows DOE staff to explore ideas and options that may be available using weatherization resources and begin to explore whether the currently approved state plan adequately addresses the circumstances and possible proposed actions.
- 3. Assess Circumstances And Determine The Need To Develop And Submit An Event-Specific Disaster Response Plan:** Assess the needs of the affected Subrecipients, and identify potential assistance available from other Subrecipients in the network that may be willing to volunteer assistance.

Verbal agreements within the scope of the grant can be made to clarify details and expedite early action during the disaster and early stages of clean-up. The grantee shall follow-up with DOE staff on verbal understandings and agreements in writing (email) promptly afterward.

Event Specific Disaster Response Plan

The “Event Specific Disaster Response Plan” will provide as much of the applicable reporting element information upfront as available and establish the estimated timeframe and end-date for DOE assistance.

It will clearly specify when the reporting will be provided to DOE as part of the proposed disaster plan (i.e., 30 days after the approved end-date for DOE weatherization assistance.) If an extension of the end-date is requested, the request will indicate the circumstances and provide updated reporting information.

Examples of Eligible Activities:

- a. **Reweatherization** - The Program Regulation allows any previously weatherized home “damaged by fire, flood or act of God” to be re-weatherized, without regard to date of weatherization, where local authorities deem the dwelling salvageable as well as habitable and if the damage to materials is not covered by insurance or some other form of compensation.
- b. **Health and Safety** - In the normal course of weatherization or re-weatherization, the cost of eliminating health and safety hazards, elimination of which is necessary before the installation of weatherization materials or the result of weatherization activities, is allowable. To the extent that the services are in support of eligible weatherization work, such expenditure would be allowable. For example, debris removal at a dwelling unit so that the unit can be weatherized would be an allowable cost. Please note that the average cost per dwelling unit limit continues to apply.
- c. **Incidental Repairs** – In the normal course of weatherization or re-weatherization, the cost of incidental repair costs to protect or aid in the installation of weatherization materials and are part of the total allowable expenditure. All incidental repair costs shall be documented as such in the client files and be tied to an energy conservation measure or group of measures. The overall cost must receive and SIR of 1+. Incidental repair costs may not exceed a maximum of \$500 per dwelling unit for labor and materials. The Subrecipients may exceed the \$500 limit, if certain requirements are met, by submitting a written waiver request to the KHRC/WAP staff for written approval. The written request must include the total amount to be expended and must include the REM/Design audit to ensure that the overall group of measures receives and SIR of 1+. The written request for a waiver can be submitted by e-mail as long as all pertinent information is submitted to KHRC/WAP staff for approval.
- d. **Protection of DOE investment**- Weatherization personnel can be paid from DOE funds to perform functions related to protecting the DOE investment. Such activities include: securing weatherization materials, tools, equipment, weatherization vehicles, or protection of local agency weatherization files, records and the like during the initial phase of the disaster response. Using 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 vehicles and/or equipment to help assist in disaster relief provided the WAP is reimbursed according to the Financial Assistance Regulations 2 CFR 200.

- e. **Priority** – It would be permissible to consider households located in the disaster area, as a priority as long as the households are eligible and meet one of the priorities established in regulation and are free and clear of any insurance claim or other form of compensation resulting from damage incurred from the disaster. Inclusion of these households as a priority must be outlined in the Disaster Response Plan.

Summary Statement

Planning and Reporting Elements: If the General Disaster Response Plan is utilized and/or an Event-Specific Disaster Response Plan is approved, the grantee will report to the DOE Project Officer on the use of Weatherization resources and the DOE grant will include, at a minimum:

- a. A description of the disaster including the counties/local weatherization agencies affected. It will include the state emergency management website that tracks disasters;
- b. A description of the types of DOE weatherization assistance, the scope and costs of weatherization activities performed.
- c. The timeframe of the disaster. The date it started, when it was declared a disaster, and the (proposed or approved) end-date for DOE weatherization assistance;
- d. An explanation of how disaster-related costs are being tracked by type of activity and summary of DOE disaster-related expenditures and programmatic reporting information. For example, the number of homes and persons assisted under the Disaster Response Plan provisions;
- e. Any other applicable items as determined by KHRC or DOE.

Reporting will be sent to the DOE Project Officer by email.

Weatherization Grantee Health and Safety Plan

Optional Template

☒ POLICY SUBMITTED WITH PLAN

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.

In PY2017, Kansas began using a new reporting management tool that is providing additional insight into the H&S expenditures on homes at the state level. In tracking additional H&S measures individually instead of in aggregate, the new system allows for a better perspective on how different funding sources supplement DOE's H&S budget. In recent years, Kansas has been fortunate to have other, non-federal, funding that has helped both to increase the H&S measures possible under the weatherization umbrella and also cover some H&S expenditures to keep DOE's portion near 17%.

The attached PDF shows the accrued H&S expenditures for recently weatherized DOE homes. This data should be a valid representation of anticipated H&S expenses and installation frequency for DOE PY20 and supports a H&S budget near 17%

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 allows these costs to be isolated from energy efficiency costs in program evaluations. Grantees are reminded that, if H&S costs are budgeted and reported under the program 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 below.

Separate Health and Safety Budget ☒

Contained in Program Operations ☐

3.0 – HEALTH AND SAFETY EXPENDITURE LIMITS

Pursuant to [10 CFR 440.16\(h\)](#), 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 that these limits may vary depending upon conditions found in different geographical areas. These limits must be expressed as a percentage of the ACPU. For example, if the ACPU is \$5,000, then an average expenditure of \$750 per dwelling would equal 15 percent expenditures for H&S.

15 percent is not a limit on H&S expenditures but exceeding this amount will require ample justification. These funds are to be expended by the Program in direct weatherization activities. While required as a percentage of the ACPU, if budgeted separately, the H&S costs 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 addressing with H&S funds should be listed along with an associated cost for each measure, and by using historical data the estimated frequency that each measure is installed 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's production estimate in the Annual File should correlate to the H&S budget amount listed in the Grantee's state plan.

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 template and matrix to help expedite this process.

[illegible]

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 applied to the H&S budget category. In order to be considered IRMs, the measure must fit the following definition and be cost justified along with the associated efficiency 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 which could not otherwise be caulked or weather-stripped and providing protective materials, such as paint, used to seal materials installed under this program. (10 CFR 440 "Definitions")

Incidental repairs are those repairs necessary for the effective performance or preservation of weatherization materials and are not Health and Safety measures and accordingly would not be charged as such.

Minor wall or roof repairs to preserve installed insulation shall be deemed an IRM, and not H&S. Minor repairs are those that can be corrected with \$500 or less.

5.0 – DEFERRAL/REFERRAL POLICY

Deferral of services may be necessary if H&S issues cannot be adequately addressed according to WPN 17-06 guidance. The decision to defer work in a dwelling is difficult but necessary in some cases. This does not mean that assistance will never be available, but that work must be postponed until the problems can be resolved and/or alternative sources of help are found. If, in the 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 where occupants are uncooperative, abusive, or threatening. Grantees must be specific in their approach and provide the process for clients to be notified in writing of the deferral and what conditions must be met for weatherization to continue. Grantees must also provide a process for the client to appeal the deferral decision to a higher level in the organization.

Grantee has developed a comprehensive written deferral/referral policy that covers both H&S, and other deferral reasons?

Yes ☒ No ☐

Where can this deferral/referral policy be accessed?

Section V.1.2 of State Plan.

6.0 – HAZARD IDENTIFICATION AND NOTIFICATION FORM(s)

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 problem, a statement indicating if, or when weatherization could continue, and the client(s) signature(s) indicating that they understand and have been informed of their rights and options.

Documentation Form(s) have been developed and comply with guidance?

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 17-06 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 17-06, Grantees must concur, or choose to defer all units where the specific category is encountered.
- “Allowable” items under WPN 17-06 leave room for Grantees to determine if the category, or testing, will be addressed and in what circumstances.
- 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?

Unsafe primary heating units must be repaired or replaced before weatherization can proceed, or deferral is required. Unsafe primary units must be proposed for replacement in the energy audit to determine if the system can be replaced as an ECM prior to repair or H&S replacement. If the unit does not qualify as an ECM, the unit will be assessed for repair or H&S replacement. If the estimated cost of repairs exceeds 50% of the estimated replacement cost, the piece of equipment shall be replaced.

Non-functioning primary heating systems will be inspected to the extent possible for H&S issues and possible repair items. Before any repair, non-functioning units will be proposed for replacement in the energy audit to determine if the system can be replaced as an ECM. The name plate efficiency rating shall be used in the audit tool. This logic potentially allows an inefficient, albeit inoperable, unit to be replaced as an EMC before any repair costs are incurred. If the unit does not qualify as an ECM, the unit will be assessed for repair or H&S replacement. If the estimated cost of repairs exceeds 50% of the estimated replacement cost, the piece of equipment shall be replaced.

Homes without any heating systems will be reviewed on a case by case basis by contacting KHRC before weatherization services begin.

Cooling system shall only be replaced as an ECM. No H&S cooling systems are permitted.

Electric space heaters are not considered unvented heaters nor are they considered unsafe heating sources for H&S weatherization purposes. No weatherization funds shall be used for the repair or replacement of electric resistance heaters. Electric resistance heating sources, both forced air and space heaters, should be proposed for ECM replacement with electric heat pumps.

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

Unsafe or non-functioning secondary heating systems, including unvented space heaters must be repaired, removed, or rendered inoperable, or deferral is required. Replacement or installation of secondary units is not allowed.

Homes heated by unvented combustion space heaters are considered unsafe and shall not be weatherized unless the heaters are removed from the premises, vented to the outside, or replaced with an appropriate primary heating unit. A secondary or backup unvented heater may be allowed to remain in place and operable as long as it is labeled as conforming with ANSI Z21.11.2. These secondary units should be tested for high levels of CO and client education on their risk and hazards must be provided. Electric space heaters are not considered unvented heaters.

Indicate Documentation Required for At-Risk Occupants

NA

Testing Protocols

All mechanical systems will be assessed at both the initial audit and at the post inspection. The most recently approved mechanical inspection forms will be utilized to record and document the results.

Separate mechanical inspections forms will be used for pre- and post-inspections. Separate mechanical forms will be used for each mechanical system.

Mechanical inspection forms will clearly identify the individual conducting the inspection and the date it was performed.

Mechanical equipment forms will collect brand, model, and serial number of equipment. Equipment shall be modeled to reflect published efficiency usage as identified by the model number when available. When published data is unavailable the estimates and assumptions in the Subrecipient Procedures Manual must be used.

Mechanical systems must be deemed safe before weatherization measures are installed and must be documented as safe at the completion of the weatherization work. This requirement applies year-round regardless of whether the equipment is in use.

For solid fuel appliances, look for visual evidence of soot on the walls, mantel or ceiling, or creosote staining near the flue pipe.

Client Education

When deferral is necessary, the client will be informed in writing of the observed condition triggering the deferral and the actions necessary in order for weatherization to commence.

Clients shall be instructed in the operation and maintenance of new equipment.

Paperwork and manuals for new equipment will be left at the residence with either the client or near or on the equipment.

Training

All auditors/inspectors are trained to test heating systems to determine proper operating performance and H&S concerns. Training on allowable activities is provided.

HVAC installers will be licensed as required by the authority having jurisdiction and will obtain all required permits.

7.2 - Asbestos - All

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

Where suspected Asbestos Containing Material (ACM) is identified precautions must be taken not to disturb the material. The suspected ACM's overall condition and potential for disturbing the material will be evaluated. Where the material condition is good and intact at time of inspection and there is no risk of disturbing the material, a blower test can be conducted. Where the material is in less than good condition, the material is non-intact, or the material may be disturbed, the home will be deferred until the material is deemed non-asbestos containing, removed, or encapsulated by a certified asbestos professional.

The exception to the above approach is vermiculite. No blower door test will occur, and the home will be deferred until the removal of vermiculite by a certified asbestos professional is completed.

General blower door testing is allowed with slate siding.

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?

Where suspected ACM's will be disturbed, the home will be deferred until the suspected material is deemed non-asbestos containing, removed, or encapsulated by a certified asbestos professional. The exception is slate type siding. Slate type sliding may be removed and reinstalled in order to install sidewall insulation and where the associated costs are charged as part of the ECM. All precautions must be taken not to damage the siding. Slate type siding should not be cut or drilled. Where possible, insulate through home interior.

Testing Protocols

Visually inspect exterior wall surfaces, floors, walls, and ceilings for suspected ACM prior to drilling or cutting. DOE/LIEAP funds cannot be used for removal, encapsulation, or testing.

Client Education

Clients and workers will be instructed not to disturb any suspected ACMs.

When deferral is necessary, the client will be informed in writing of the observed condition triggering the deferral and the actions necessary in order for weatherization to commence.

Training and Certification Requirements

Workers are instructed not to disturb any suspected ACMs and to take all precautions to not damage slate type siding. The use of PPEs and safe practices when working around suspected ACMs as outline in the SWS's are recommended.

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?

NA- When vermiculite is present, the home will be deferred until the removal of vermiculite by a certified asbestos professional is completed. DOE funds cannot be used for removal.
Testing Protocols
NA
Client Education
Clients will be instructed to not disturb the vermiculite and asbestos safety information will be provided. The deferral language will provide information in writing describing that in order for weatherization to proceed there must be documentation that a licensed professional removed the vermiculite.
Training and Certification Requirements
Auditors will receive training on how to recognize vermiculite and to not disturb it.

7.2c – Asbestos - on pipes, furnaces, other small covered surfaces
Concurrence, Alternative, or Deferral
Concurrence with Guidance <input type="checkbox"/> Alternative Guidance <input checked="" type="checkbox"/> Results in Deferral <input type="checkbox"/>
Suspected asbestos containing material present on pipes, furnaces, or other small covered surfaces, shall be assumed to contain asbestos, unless testing determines otherwise. The material's overall condition and the potential for disturbing the material will be evaluated. Where the material condition is good and intact at time of inspection and there is no risk of disturbing the material, weatherization work should proceed. Clients and workers will be instructed not to disturb the material. Where the material is in less than good condition, the material is non-intact, or the material may be disturbed, the home will be deferred until the material is deemed non-asbestos containing, removed, or encapsulated by a certified asbestos professional. DOE/LIEAP funds cannot be used for removal, encapsulation, or testing.
Funding
DOE <input type="checkbox"/> LIHEAP <input type="checkbox"/> State <input checked="" type="checkbox"/> Utility <input type="checkbox"/> Other <input type="checkbox"/>
How do you address suspected ACM's (e.g., pipes, furnaces, other small surfaces) that will be disturbed through the course of weatherization work?
Where suspected ACM's are present that will be disturbed through the course of weatherization, the home will be deferred until the material is deemed non-asbestos containing or is removed or encapsulated by a certified asbestos professional.
Testing Protocols
Auditors will assess whether suspected ACMs are present. DOE/LIEAP funds cannot be used for removal, encapsulation, or testing.
Client Education
Clients will be instructed to not disturb the suspected ACMs and asbestos safety information will be provided. When non-federal funds are used for testing, the test results will be shared in writing with the client.
When deferral is necessary, the client will be informed in writing of the observed condition triggering the deferral and the actions necessary in order for weatherization to commence.
Training and Certification Requirements
Auditors will receive training on how to recognize suspected ACMs.

7.5 – Biologicals and Unsanitary Conditions (odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.)

Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Unallowable Measure <input checked="" type="checkbox"/>				
Funding				
DOE <input type="checkbox"/>	LIHEAP <input type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
What guidance do you provide Subgrantees for dealing with biological and/or unsanitary conditions in homes slated for weatherization?				
<p>Removal of mold, odors, viruses, bacteria, unsanitary conditions (including raw sewage), and rotting wood is not a Weatherization responsibility; however, program workers frequently encounter these conditions. DOE funds may not be used to correct the condition and the home may need to be deferred in cases where conditions in the home pose a health risk to occupants and/or weatherization workers. Caution should be taken when selecting air ventilation rates for dwellings with these problems. Since some of these conditions are related to moisture, procedures that allow local agencies to assess moisture conditions as a part of the initial audit procedure and treat them as part of the weatherization work have been established; see Mold and Moisture. If necessary, weatherization services may need to be delayed until the problem can be referred to another agency that can take remedial action.</p>				
Testing Protocols				
Sensory inspection.				
Client Education				
When deferral is necessary, the client will be informed in writing of the observed condition triggering the deferral and the actions necessary in order for weatherization to commence.				
Training				
Auditors will receive training and instruction on how to recognize unsafe conditions, when to defer, and safe work practices when encountering such conditions.				

7.6 – Building Structure and Roofing				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input checked="" type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
What guidance do you provide Subgrantees for dealing with structural issues (e.g., roofing, wall, foundation) in homes slated for weatherization?				
<p>Building rehabilitation is beyond the scope of the Weatherization Assistance Program; however, program workers frequently encounter homes in poor structural condition. Dwellings whose structural integrity is in question should be referred to housing rehabilitation programs where appropriate. Weatherization services may need to be delayed until the dwelling can be made safe for crews and occupants. Incidental repairs necessary for the effective performance or preservation of weatherization materials are allowed. Examples of these limited repairs include sealing minor roof leaks to preserve new attic insulation and repairing water-damaged flooring as part of replacing a water heater.</p>				
How do you define “minor” or allowable structure and roofing repairs, and at what point are repairs considered beyond the scope of weatherization?				
<p>Minor repairs are those repairs that can be corrected with a maximum \$500 incidental repair. All minor repairs must meet and follow the definition and requirement of incidental repairs.</p>				

If priority lists are used, and these repairs are designated as Incidental Repairs, at what point is a site-specific audit required?
NA
Client Education
When deferral is necessary, the client will be informed in writing of the observed condition triggering the deferral and the actions necessary in order for weatherization to commence.
Training
Auditors will receive basic information on how to identify structural issues that pose a risk to occupants and/or weatherization workers. Roofing will be inspected for active roof leaks.

7.7 – Code Compliance				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input checked="" type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
What guidance do you provide Subgrantees for dealing with code compliance issues in homes receiving weatherization measures?				
<p>The correction of preexisting code compliance issues is not an allowable cost unless triggered by weatherization measures being installed in a specific room or area of the home. When correction of preexisting code compliance issues is triggered and paid for with WAP funds, cite specific code requirements with reference to the weatherization measure(s) that triggered the code compliance issue in the client file. State and local (or jurisdiction having authority) codes must be followed while installing weatherization measures. Condemned properties and properties where “red tagged” or health and safety conditions exist that cannot be corrected under this guidance must be deferred.</p>				
What specific situations commonly trigger code compliance work requirements for your network? How are they addressed?				
<p>Flue liners or resizing of water heater flues when a weatherization installed furnace orphans the water heater. Flue liners and flue corrections are allowable H&S items.</p> <p>Federal Pacific breaker boxes are present in Kansas homes and where mechanical equipment replacements are required, this unsafe breaker box must be replaced. This is an allowable H&S expense, but typically will require additional non-federal funding.</p> <p>The correction of all mechanical code violations may be required when pulling a mechanical permit for the installation of new mechanical equipment. This may include installing a gas line drip leg on water heaters when installing in a new furnace. The correction of code issues when required, is an allowable H&S expense.</p> <p>Electrical code compliance work is allowed when required when installing new ventilation equipment.</p>				
Client Education				
When deferral is necessary, the client will be informed in writing of the observed condition triggering the deferral and the actions necessary in order for weatherization to commence.				
Training				
Auditors will receive basic information from their agencies on what code compliance may be required in their counties and localities.				

7.8 – Combustion Gases				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input checked="" type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
Testing Protocols				

All combustion space and water heating appliances will be assessed at both the initial audit and at the post inspection. The most recently approved mechanical inspection forms available will be utilized to record and document the results. Separate mechanical inspections forms will be used for pre- and post-inspections.

Separate mechanical forms will be used for each mechanical system.

Proper venting to the outside for combustion appliances, including gas dryers and refrigerators, furnaces, vented space heaters, and water heaters is required. Also see Gas Ovens, Stovetops, Ranges.

When testing indicates a performance problem, venting corrections will be made. Prescriptive correction of preexisting venting code compliance issues, or combustion air calculations, are not eligible H&S measures unless triggered by code compliance requirements. When correction of preexisting code compliance issues is triggered and paid for with WAP funds, cite the specific code requirements with reference to the weatherization measure(s) that triggered the code compliance issue in the client file.

Follow the Kansas SWS Field Guide for testing procedures and action levels.

Follow the Subrecipient Procedures Manual, section Mechanical Systems, to assess combustion equipment and determine repair or replacement procedures.

Combustion appliances must be deemed safe before weatherization measures are installed and must be documented as safe at the completion of the weatherization work. This requirement applies year-round regardless of whether the equipment is in use.

All naturally drafting combustion equipment within the home's pressure boundary will be tested with the Combustion Appliance Zone (CAZ) in the worst-case depressurization state. This is required at the initial audit and final inspection.

Fireplaces can present special hazards that may be affected by weatherization. Fireplaces, as well as all solid fuel appliances, should be inspected for visual evidence of soot on the walls, mantel, or ceiling, or creosote staining near the chimney/flue pipe. These can indicate combustion/drafting issues. Assess whether the fireplace is a primary heating source, a backup heating source, or merely decorative in nature. Operational fireplaces used for primary heating should have the CAZ zone tested under worst case conditions. CAZ depressurization exceeding 5 pascals in the space having the fireplace should have pressure imbalances corrected, additional combustion air added, or the fireplace disabled.

When a fireplace is used for primary heating, other combustion appliances, such as gas water heaters, should be tested under simulated worst-case conditions. A blower door can be set to run at 300 CFM (depressurization) to mimic the airflow dynamics likely when the fireplace is in use.

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

Daily Test Out Procedures for Crew Based Weatherization:

Any time the air seal/insulation crew performs work on a home, the crew will utilize a smoke pencil or mirror to conduct testing for spillage of any atmospheric draft appliance and measure ambient CO level present in the home prior to leaving the home. This testing will be conducted with all exhaust appliances running. In the event an appliance spills for more than 2 minutes, the appliance will be turned off, allowed to cool, and re-tested under natural conditions. If the appliance fails spillage under natural conditions, or if at any time the ambient CO level in the home exceeds 35 ppm during testing, the appliance will be turned off and the client will be instructed not to operate the appliance until it has been serviced and re-tested by HVAC or authorized personnel and found to be operating safely. Crews will notify HVAC or other authorized personnel that the home needs immediate attention.

Appliances that fail under CAZ worst-case depressurization but pass at natural are not necessarily immediate hazards but will be addressed before the final inspection. HVAC or other authorized personnel will be notified to schedule servicing. Residents will be instructed to avoid the conditions causing CAZ depressurization until repairs are completed.

Crew HVAC personnel will test any equipment they service or install. They will also conduct spillage, draft, flue CO, and ambient CO testing on any atmospheric drafting appliances during CAZ worst-case depressurization prior to leaving the home. Testing will follow the same procedures as auditors and inspectors. Hazards that require an immediate response will be addressed during the visit. If unable to correct the issue prior to leaving, the client will be instructed not to operate the appliance until it has been serviced and re-tested by HVAC personnel and found to be operating safely.

Client Education

Clients will be instructed on the use of new combustion equipment and provided combustion safety and hazards information.

Training

As part of initial, and on-going training, auditors are trained on how to perform appropriate combustion appliance testing, CAZ depressurization hazards and corrections, and 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?

The two primary energy-related health and safety electrical concerns are insulating homes that contain knob-and-tube wiring and identifying overloaded electrical circuits. Knob-and-tube wiring located in a wall cavity or exposed on an attic floor was intended by code to have free air movement to cool the wire when it is carrying an electric current. Laboratory tests have shown that retrofitting thermal insulation around electric wiring can cause it to overheat, resulting in a fire hazard. For this reason, the installation of insulation around live knob and tube wiring should not be performed. Sidewalls that contain live knob and tube wiring are not to be blown with insulation. In attics, a reasonable cost of rewiring live knob and tube should be included in the cost of the attic insulation for audit approval. The cost of rewiring will be charged with the cost of the energy conservation measure of attic insulation if audit approved. If the cost of rewiring is prohibitive, the cost of attic insulation shall be run independently and should be valleyed or dammed to prevent covering live knob and tube. Subrecipients are to abide by more stringent applicable codes in jurisdictions where the work is being performed.

Voltage detection testing is required on knob and tube wiring.

Serious electrical hazards exist when gross overloads are present. Should auditors and crews find such existing problems, they should notify the owner. Weatherization measures that involve the installation of new equipment such as air conditioners, heat pumps, ventilation systems, or electric water heaters can exacerbate previously marginal overload problems to hazardous levels. The problem should also be noted in the client file. To the extent that these problems prevent adequate weatherization, the agency should consider repairing them on a case-by-case basis. Deferral may be necessary.

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

When the H&S of the occupant or worker(s) is at risk, minor repairs are allowed when necessary for weatherization measures. Minor repairs are those repairs that can be corrected with a maximum \$500 repair. Electrical upgrades or repairs which are a direct component of an energy conservation measure must be charged as part of the energy conservation measure and cannot be charged to the health and safety budget category. Electrical upgrades or repairs which are part of a H&S furnace, H&S water heater, or H&S ventilation system (ASHRAE) must be charged as part of the associated H&S measure.

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

NA

Client Education

When deferral is necessary, the client will be informed in writing of the observed condition triggering the deferral and the actions necessary in order for weatherization to commence.

Training

As part of initial training, auditors are trained on how to identify and test knob and tube wiring. OSHA training can provide additional electrical safety training.

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

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?
Formaldehyde vapors may be slowly released by some new carpets, waferboard, plywood, etc. VOCs are also emitted by some household cleaning agents. Ventilation rates will be taken into consideration in dwellings with VOC or other air pollutant issues.
Removal of pollutants is allowed and is required if they pose a risk to workers. 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
Sensory inspection.
Client Education
When deferral is necessary, the client will be informed in writing of the observed condition triggering the deferral and the actions necessary in order for weatherization to commence.
Training
EPA's information on indoor air quality will assist auditors on how to recognize potential hazards and when removal is necessary.

7.11 – Fuel Leaks <i>(please indicate specific fuel type if policy differs by type)</i>				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input checked="" type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
Remediation Protocols				
Exposed gas lines will be inspected using an electronic combustion gas detector from the utility coupling into and throughout the home. Gas leaks should be verified with a soap solution and marked for repair. When a gas leak is found on the utility side of service, the client must contact the utility service before work may proceed. Fuel leaks that are the responsibility of the client must be repaired before weatherizing the unit. Fixing minor fuel leaks inside the home are allowable H&S expenses.				
How do you define allowable fuel leak repairs, and at what point are repairs considered beyond the scope of weatherization?				
Minor gas leak repairs are allowable weatherization H&S measures. Minor repairs are those that can be corrected with \$500 or less.				
Client Education				
Clients will be notified in writing if fuel leaks are detected.				
Training				
As part of initial training, auditors are trained on how to conduct fuel leak testing.				

7.12 – Gas Ovens / Stovetops / Ranges				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input checked="" type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>

What guidance do you provide Subgrantees for addressing unsafe gas ovens/stoves/ranges in homes slated for weatherization?
Replacement of gas ovens, stovetops, and ranges is not allowed.
Gas ovens will be tested for CO following BPI's test procedures. If units exceed 450 ppm air-free at steady state, a clean and tune will be conducted. Clients will be notified if units do not improve after cleaning and tuning and a CO alarm will be installed.
Gas ranges will be visually inspected. Clients will be notified that a clean and tune or repair is recommended if the flame has any discoloration, flame impingement, an irregular pattern, or if the burners are visibly dirty, corroded, or bent.
Client education will be provided on how to minimize CO exposure such as running exhaust fans when cooking and the importance of keeping the oven and burners clean.
Testing Protocols
See above
Client Education
See above
Training
Oven and range inspection procedures and CO action levels will be part of comprehensive training for auditors.

7.13 – Hazardous Materials Disposal [Lead, Refrigerant, Asbestos, Mercury (including CFLs/fluorescents), etc.] <i>(please indicate material where policy differs by material)</i>				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input checked="" type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
Client Education				
All clients will receive a pre-renovation lead pamphlet.				
Clients will be instructed to not disturb suspected asbestos containing material and asbestos safety information will be provided in writing if suspected ACM's are present.				
Clients will be informed in writing of hazards associated with hazardous waste materials being handled in the home.				
Training				
Appropriate PPE will be used for working with hazardous waste materials and weatherization staff will be reminded of the health and environmental risks related to hazardous materials and the requirement for proper disposal.				
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. Contract language will reflect this requirement.				

7.14 – Injury Prevention of Occupants and Weatherization Workers (Measures such as repairing stairs and replacing handrails)				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>		Results in Deferral <input type="checkbox"/>	
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input checked="" type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
What guidance do you provide Subgrantees regarding allowable injury-related repairs (e.g., stairs, handrails, porch deck board)?				
<p>Minor repairs to stairs, steps, railings, etc., are allowed incidental repairs under the program if necessary to complete the weatherization work. For example, broken steps to the basement where the furnace is located may be repaired if necessary in order to complete furnace work. Items not necessary for the installation of a weatherization measure are not allowed. Minor repairs made to remedy the issues must meet the definition of incidental repairs and will be charged as incidental repairs rather than H&S.</p> <p>Necessary repairs beyond the scope of the program will result in a deferral. When deferral is necessary, the client will be informed in writing of the observed condition triggering the deferral and the actions necessary in order for weatherization to commence.</p>				
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 to this section will follow the incidental repair policy which outlines a \$500 cap.				
Training				
Auditors will be trained on the use of the hazard identification form.				

7.15 – Lead Based Paint				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>		Results in Deferral <input type="checkbox"/>	
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input checked="" type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
Safe Work Protocols				

All weatherization auditors, inspectors, field monitors, agency crew members, general weatherization contractors and their crew members must attend and successfully complete a Kansas Department of Health and Environment (KDHE) approved Lead Safe Work Practice Training course and fulfill KDHE requirements to become Certified Renovators. Work must follow KDHE's Renovation, Repair, and Painting Program (RRP) when working in pre-1978 housing unless KHDE approved testing confirms the work area to be lead free.

All general weatherization contractors and agency crews will be responsible for complying with the Lead Based Paint Renovation, Repair, and Painting Rule (RRP) as enforced by KDHE in Kansas. Weatherization contractors and agencies with crews must be KDHE Licensed Renovation Firms.

RRP and Kansas weatherization requires all licensed firms to employ a Certified Renovator who is registered with the KDHE. Weatherization jobs will have a designated Certified Renovator on each job site at all times during weatherization activities. The Certified Renovator will document that RRP requirements were followed. Agency crews will include this documentation in the client file. Contractors are responsible to KDHE for completing and retaining proper documentation. Contractors, and agency crews, will provide a signed Lead Safe Work Practices Declaration form with the certified renovator's signature for the client file for all weatherization jobs. A copy of this documentation is required in the client file.

Only those costs directly associated with the lead safe practices for surfaces directly disturbed during weatherization activities are allowable H&S expenditures.

Testing Protocols

See above

Client Education

Clients will receive a pre-renovation lead pamphlet.

When deferral is necessary, the client will be informed in writing of the observed condition triggering the deferral and the actions necessary in order for weatherization to commence.

Training and Certification Requirements

See above

Documentation Requirements

All client files will have a lead pamphlet delivery declaration. The Lead Safe Work Practices Declaration form with the certified renovator's signature is also required in the client 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?

Limited water damage repairs that can be addressed by weatherization workers are allowed when necessary in order to weatherize the home and to ensure the long-term stability and durability of the measure. Repairs not directly necessary for the installation of an ECM or H&S item are not allowed. Repair costs must be included with the associated weatherization measure.

Source control (i.e. correction of moisture and mold creating conditions) is allowed when necessary in order to weatherize the home and to ensure the long-term stability and durability of the measure. Source control is independent of latent damage and related repairs. Source control includes but is not limited to: gutters, down spouts, extensions, flashing, sump pumps, minor dirt work for drainage, and landscaping. The installation of dehumidifiers is typically beyond the scope of weatherization and requires a field waiver from the grantee. Major drainage issues are beyond the scope of the program. Source control is allowable only as they relate to mold and moisture creating conditions.

Ground moisture barriers will be installed in accordance with the approved Kansas SWS Field Guide. Ground moisture barriers will be installed over exposed soil in crawl spaces and basement where 2/3 or more of the area is accessible AND the installed portion can be adequately sealed to the adjacent foundation walls. Accessibility is to be determined by the initial auditor. Ground moisture barriers will not be installed where bulk water intrusion/standing water is a concern.

Mold cleanup or testing is not an allowable Health and Safety 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 and cannot be charged to the H&S budget category.

Where severe mold and moisture issues cannot be addressed, deferral is required.

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 those that can be corrected with \$500 or less.

Client Education

Auditors will complete a mold assessment and release form for each home. Where mold or moisture issues are identified, clients will receive information concerning the issue and will sign the release form.

When deferral is necessary, the client will be informed in writing of the observed condition triggering the deferral and the actions necessary in order for weatherization to commence.

When source moisture problems are identified, clients will be provided information on them. For example, the importance of cleaning and maintaining drainage systems such as gutters, or how proper landscape design and site drainage impacts moisture control.

Training

During initial training, auditors will be provided the following resources:

- EPA Handout: A Brief Guide to Mold, Moisture, and Your Home
- DOE Energy-Related Mold and Moisture Training:
https://www.youtube.com/playlist?list=PL9LTtgvpB4EP_Cbx26KsVtjAzUupC8gf
- WxTV Mold and Moisture Issue: <http://wxtvonline.org/2011/01/mold/>

7.17 – Pests

Concurrence, Alternative, or Deferral

Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>
Funding		
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input checked="" type="checkbox"/> Utility <input type="checkbox"/> Other <input type="checkbox"/>
What guidance do you provide Subgrantees for dealing with pests and pest intrusion prevention in homes slated for weatherization?		
Pest removal is allowed only where infestation would prevent weatherization. Infestation of pests may be cause for deferral where it cannot be reasonably removed or poses health and safety concern for workers. Screening of windows and points of access is allowed to prevent intrusion. Incorporating pest exclusion into air sealing practices to prevent intrusion is allowed as part of the air sealing ECM. The use of harsh chemicals is to be avoided.		
Define Pest Infestation Thresholds, Beyond Which Weatherization Is Deferred		
Discretion to defer homes based on pests is left up to the individual auditor and work crews. Unsafe or unsanitary conditions are allowable deferral conditions.		
Testing Protocols		
Sensory inspection.		
Client Education		
When deferral is necessary, the client will be informed in writing of the observed condition triggering the deferral and the actions necessary in order for weatherization to commence.		
Training		
Auditors are instructed to assess the presence and degree of infestation and associated risks.		

7.18 – Radon		
Concurrence, Alternative, or Deferral		
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>
Funding		
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input checked="" type="checkbox"/> Utility <input type="checkbox"/> Other <input type="checkbox"/>
What guidance do you provide Subgrantees around radon?		
Radon testing and mitigation is not an allowable activity under the weatherization program. However, since radon may be present in all Kansas homes, precautionary measures to reduce the possibility of making radon issues worse are allowable H&S expenditures. Whenever site conditions permit, exposed dirt floors within the pressure/thermal boundary must be covered with an appropriately installed and sealed vapor barrier. Other precautions may include, but are not limited to, sealing any observed floor and/or foundation penetrations, installing a cover over open sump pits, or air sealing unconditioned cellars or crude basements to minimize connection with the living space.		
Testing Protocols		
Radon testing is not an allowable weatherization measure.		
Client Education		
All clients will be provided EPA's <i>A Citizen's Guide to Radon</i> and will be required to sign off on a Radon Informed Consent Form.		
Training and Certification Requirements		
Auditors, assessors, and inspectors will be familiar with the EPA's <i>A Citizen's Guide to Radon</i> and will be able to discuss it with clients. They will also know the precautionary measures that may be helpful.		
Documentation Requirements		

All client files will have a signed Radon Informed Consent Form. A sample of this form is available on the WAP Sharepoint site.

7.19 – Safety Devices: Smoke and Carbon Monoxide Alarms, Fire Extinguishers				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>		Results in Deferral <input type="checkbox"/>	
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input checked="" type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
What is your policy for installation or replacement of the following:				
Smoke Alarms: Where alarms are not present or are inoperable, one UL-217 listed smoke alarm will be installed outside sleeping areas and on each habitable floor within every weatherized home. Alarms shall have non-removable, non-replaceable 10-year lithium batteries.				
Carbon Monoxide Alarms: Where alarms are not present or are inoperable, one CO alarm will be installed outside the primary sleeping area and on each habitable floor within every weatherized home. Alarms shall be sealed lithium battery unit.				
Fire Extinguishers: Fire extinguishers are not an allowable H&S measure.				
Testing Protocols				
Existing alarms will be tested for operation and checked for remaining life. New installed alarms will be tested to verify operation.				
Client Education				
Where alarms are installed, clients will be provided with verbal and written information on the use of the devices.				
Training				
The Kansas SWS Field Guide provides instruction on alarm installation.				

7.20 – Occupant Health and Safety Concerns and Conditions				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>		Results in Deferral <input type="checkbox"/>	
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input checked="" type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
What guidance do you provide Subgrantees for soliciting the occupants' health and safety concerns related to components of their homes?				

<p>K-WAP staff and contractors will be required to take all reasonable precautions against performing work on homes that will subject workers or clients to health and safety risks.</p> <p>Before work begins on the residence, the agency/contractor must take into consideration the health concerns of each occupant, the condition of the dwelling, and the possible effect of work to be performed on any particular health or medical condition of the occupants.</p> <p>Subrecipients will provide a “Occupant Pre-Existing or Potential Health Conditions” form to the client which explains that some weatherization measures create dust, smells, or other conditions that may aggravate certain health conditions in some individuals. The client will then have the opportunity to self-identify any pre-existing or potential health concerns that may be aggravated by weatherization services.</p> <p>Agencies, and contractors, are to take into account the client’s concerns to the extent feasible to minimize health risks, such as scheduling weatherization work when the at-risk occupants aren’t present. It is the responsibility of the occupants to take the appropriate safety precautions to protect themselves and notify weatherization workers in advance of any health risks they may have. Clients will be provided a point of contact, in writing, so that the client can inform the subrecipient of any new or developing health conditions. Failure or the inability to take appropriate actions must result in deferral.</p>
<p>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?</p>
<p>Same as above</p>
<p>What guidance do you provide Subgrantees for dealing with potential health concerns when they are identified?</p>
<p>See above</p>
<p>Client Education</p>
<p>See above.</p> <p>Clients will be provided a point of contact in writing so that the client can inform the subgrantee of any new or developing health condition.</p> <p>When deferral is necessary, the client will be informed in writing of the observed condition triggering the deferral and the actions necessary in order for weatherization to commence.</p>
<p>Documentation Form(s) have been developed and comply with guidance? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>A sample of this form is available on the WAP Sharepoint site.</p>

7.21 – Ventilation and Indoor Air Quality				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input checked="" type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
Identify the Most Recent Version of ASHRAE 62.2 Implemented (optional: identify Addenda used)				
ASHRAE 62.2-2016, appendix A utilized.				
Testing and Final Verification Protocols				

For all DOE funded homes, ASHRAE 62.2-2016 minimum ventilation standards are required to be met to the fullest extent possible and are allowable Health and Safety costs. Weatherization auditors/inspectors are required to receive training on ASHRAE 62.2 evaluation, fan flow, and post weatherization testing to ensure compliance. Additional ventilation will be added, or existing ventilation modified where required. When installing a new fan to meet whole-house ventilation requirements, actions will be taken to prevent zonal pressure differences greater than 3 pascals across the closed door. The KHRC provided ASHRAE 62.2-2016 spreadsheet or the ASHRAE 62.2-2016 calculator from the Residential Energy Dynamics (RED) website will be utilized. Client files will contain ASHRAE testing and verification records.

Client Education

Clients will be provided information on the function, use, and maintenance (including location of service switch and cleaning instructions) of ventilation systems and components. Equipment manuals will be left with the client. Clients will receive a disclaimer that ASHRAE 62.2 does not account for high polluting sources or guarantee indoor air quality.

Training

ASHRAE 62.2 training will be provided as part of initial and on-going comprehensive training for auditors and inspectors.

7.22 – Window and Door Replacement, Window Guards

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☒ Alternative Guidance ☐ Results in Deferral ☐

Funding

DOE ☐ LIHEAP ☐ State ☐ Utility ☐ Other ☐

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

Replacement, repair, or installation is not an allowable Health and Safety cost but may be allowed as an incidental repair or an efficiency measure if cost justified.

Testing Protocols

NA

Client Education

Clients are provided written information on lead risks wherever issues are identified.

Training

Auditor and inspectors are made aware of this 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?

Local agencies and contractors must comply with Occupational Safety and Health Administration (OSHA) requirements in all weatherization activities. Costs for subrecipients to comply with OSHA requirements may be charged to program support as tools and equipment. Safe work practices are verified during in-progress monitoring. In-progress monitoring will occur annually.

Training and Certification Requirements
Because of the wide range of activities involved in weatherizing a house, ensuring crew health and safety requires a broad knowledge of the appropriate safety requirements. Some of these requirements include, but are not limited to: respirator protection, techniques for safely lifting heavy objects, electrical equipment safety, ladder safety, and general worker protection. OSHA standards should be consulted for further details.

7.24 – <Add in Topic>				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input type="checkbox"/>	LIHEAP <input type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
Remediation Protocols				
Testing Protocols				
Client Education				
Training				

H&S Job Cost Report- DOE19 YTD

Report Created: 3/17/2020

Total Billed Jobs:	147.		
Budget Type: Health & Safety			
Measure	Measure Average Cost	Percentage	Total Average Cost
DWH Flue Liner (H&S)	\$379.8	2.72%	\$10.33
DWH Flue Repairs (H&S)	\$153.23	9.52%	\$14.59
DWH Flue Replacement (H&S)	\$245.9	1.36%	\$3.35
Flex Dryer Hose (H&S)	\$22.45	3.40%	\$0.76
H&S Furnace Flue Repair	\$194.61	1.36%	\$2.65
H&S Furnace Gas Line Repair/Replacement	\$66.78	0.68%	\$0.45
H&S Furnace Replacement - Gas 92%+ AFUE	\$2,284.11	14.29%	\$326.3
H&S Furnace Replacement - Gas Console/Wall Unit	\$2,239.62	3.40%	\$76.18
H&S Furnace Replacement - Gas Package Unit	\$3,792.6	0.68%	\$25.8
Hard Pipe Dryer Hose (H&S)	\$84.	0.68%	\$0.57
Install CO Detector (Battery) (H&S)	\$88.84	18.37%	\$16.32
Install Combustion Grill (Wall or Door) (H&S)	\$128.79	3.40%	\$4.38
Install Dryer Vent Kit w/ Flapper - Install New (H&S)	\$86.4	14.29%	\$12.34
Install Dryer Vent Kit w/ Flapper - Replace Existing (H&S)	\$43.82	6.80%	\$2.98
Install Ductwork (Repair)- Insulated Rigid Duct R-8 (H&S)	\$92.6	1.36%	\$1.26
Install Smoke Detector (Battery) (H&S)	\$53.16	12.24%	\$6.51
Install Smoke/CO Combo Detector (Battery)	\$85.82	42.18%	\$36.2
Lead Safe Work - Wall Work (H&S)	\$273.28	6.12%	\$16.73
Lead Safe Work - Window Work (H&S)	\$227.5	1.36%	\$3.1
Mechanical Ventilation - Caulk and Vent Existing Fan to Exterior (H&S)	\$218.1	23.81%	\$51.93
Mechanical Ventilation - Install New Exhaust Fan (complete install) (H&S)	\$646.78	40.82%	\$263.99
Mechanical Ventilation - Install Roof Termination Kit for existing fan (H&S)	\$350.	0.68%	\$2.38
Modify Duct System (H&S)	\$143.11	4.08%	\$5.84
Other Work Not Specified (H&S)	\$326.3	15.65%	\$51.05
Oven/Range Clean and Tune (H&S)	\$245.	1.36%	\$3.33
Remove Unvented Heater- Cap Gas Line (H&S)	\$220.5	0.68%	\$1.5
Vapor Barrier (H&S)	\$393.14	6.12%	\$24.07
Total Average H&S Cost Per Unit			\$964.89
PY2020 Estimated Average H&S Cost Per Unit			\$1,122.00
Estimated Production			300
Estimated Program Operations Budget			\$1,979,432.00
H&S Budget (Total H&S cost per unit x production)			\$336,600.00
Requested H&S percentage per unit (H&S budget/Program Operations)			Should be 17.0% based on a \$6600 ACPU