

KANSAS HOUSING

State of Kansas Weatherization State Plan Application 2022 Proposed Draft

**Kansas Housing Resources Corporation
611 S. Kansas Avenue, Suite 300
Topeka, KS 66603-3803
(785) 217-2001 / FAX (785) 232-8084
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Application for Federal Assistance SF-424			
*1. Type of Submission: ☐ Preapplication ☒ Application ☐ Changed/Corrected Application		*2. Type of Application: * If Revision, select appropriate letter(s): ☒ New ☐ Continuation *Other (Specify): _____ ☐ Revision	
* 3. Date Received: 12/13/21		4. Applicant Identifier:	
5a. Federal Entity Identifier:		*5b. Federal Award Identifier: DE-EE0007920	
State Use Only:			
6. Date Received by State: 12/13/21		7. State Application Identifier: 2022 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: _____		*First Name: <u>Christine</u>	
Middle Name: _____			
*Last Name: <u>Reimler</u>			
Suffix: _____			
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-0002022

*Title:

2022 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 45 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: 07/01/2022	*b. End Date: 06/30/2023
18. Estimated Funding (\$):	
*a. Federal	\$ \$3,104,047.00
*b. Applicant	\$ _____
*c. State	\$ _____
*d. Local	\$ _____
*e. Other	\$ _____
*f. Program Income	\$ _____
*g. TOTAL	\$ \$3,104,047.00
*19. Is Application Subject to Review by State Under Executive Order 12372 Process? ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on _____ ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review. ☒ c. Program is not covered by E.O. 12372.	
*20. Is the Applicant Delinquent on Any Federal Debt? (If "Yes," provide explanation in attachment.) ☐ Yes ☒ 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) ☒ ** 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: <u>Ryan</u>
Middle Name: _____	
*Last Name: <u>Vincent</u>	
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 2016-2020 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.

The following information is based on the PY21 values and will be updated when PY22 allocations are released.

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	\$278,633	25	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	\$787,728	74	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	\$403,178	38	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	\$1,191,705	112	Dist. 1, 47% Dist. 2, 15% Dist. 4, 38%
TOTAL ESTIMATED COST AND UNITS		2,661,244	249	

IV.2 WAP PRODUCTION SCHEDULE

	Annual Total
Weatherized Units (TOTAL)	249
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	249
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)	249
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	\$1,688,911
G. Total Units to be Weatherized, plus Planned Reweatherized Units from Production Schedule above (total from D above)	249
H. Average Program Operations Costs per Unit (F divided by G)	\$6,798.78
I. Average Vehicles and Equipment Acquisition Cost per unit (total from E)	\$0.00
J. Total Average Cost per Dwelling Unit (H plus I)	\$6,782.78

The PY 2022 average expenditure limit is \$8,009 per Weatherization Program Notice 22-1, effective date of December 13, 2021, and shall be the maximum average expenditure allowed. For planning purposes an average of \$6,800 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 2022. 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	249	(a)
Multiply (a) by 29.3 MBtu for Total Annual Estimated Energy Savings resulting from DOE appropriated funds	7296 MBtu	(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: 2022)

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

Theresa English

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

Beth Pauley

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

Hilary Lukens

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

Faye Kinner and Janell Igoe

Constituent Affiliation – Atmos Energy (utility company, representing energy users)
25090 W 110th Terrace
Olathe, KS 66061

David Carter

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

Jessica Wederski

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

Kara Titus

Constituent Affiliation – Kansas Gas Service (utility company, representing energy users)
5960 Executive Ct.
Manhattan, KS 66503

IV.6 HEARING AND TRANSCRIPTS (PLANNED SCHEDULE)

On February 16, 2022, Weatherization Grantee and Subrecipient Weatherization Directors discussed focus areas of review for the 2022 State Plan Application.

The Kansas Register ran the Notice for Public Hearing on January 27, 2022. On February 2, 2022, a virtual public hearing was held to gather input from the general public on the development of the 2022 State Plan. A video recording of the event is available upon request and no comments were received.

Weatherization Subrecipients and PAC members were emailed the draft proposal on March 11, 2022, and a meeting with these stakeholders was held on April 6, 2022, 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 7, 2022. The Public Hearing will be held on April 20, 2022.

IV.7 MISCELLANEOUS

Search and selection of additional subrecipients:

KHRC began a search for additional weatherization subrecipients during the fall of 2021 in an attempt to help build program capacity. KHRC had been discussing this possibility with our current subrecipient network for years and the global pandemic, continued program growth, and the potential for future growth necessitated that we start the search. An initial Expression of Interest (EOI) letter seeking potentially interested parties for anywhere in the state was released in early October 2021. The announcement was publicly shared on our website, emailed to the general KHRC Constant Contact email list, and directly emailed to statewide partners, subrecipients of other federal programs, current weatherization subrecipients, PAC members, and others. EOI responses were due November 12, 2021. Six agencies provided responses. KHRC and potentially impacted subrecipients evaluated the submissions and identified two submissions, Flint Hills Regional Council (FHRC) and Southeast Kansas Community Action Program (SEKCAP) that showed potential in providing beneficial capacity in geographically beneficial locations. KHRC initiated additional conversations with these entities to provide more information on the program and outline the full proposal and public hearing process. These entities are currently exploring their interest and capacity in submitting a proposal. Full proposals will be evaluated once received and KHRC will host a public hearing pursuant to [§ 440.14\(a\) to receive public comment on the proposal prior to subrecipient selection. A several year ramp up period is anticipated for any new weatherization subrecipient. Additional information is available upon request. State plan revisions will be necessary if any new subrecipient is added during this next program year.](#)

“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.

Applicants receiving LIEAP Utility Assistance from Kansas Department of Children and Families (KDCF) during the current program year will automatically income qualify for weatherization services.

WPN 22-5 extended categorical income eligibility to HUD means-tested programs. WAP subrecipients may certify that applicants have met the income requirements of HUD means-test programs through mechanisms including, but not limited to, applicant documentation, interagency lists of recipients, shared system databases, etc. The method of verification of eligibility will be included in the client file.

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 22-3 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.

Signed permission from the owner, or authorized agent, 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.

Reweatherization:

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 with any federal “weatherization” sources (DOE, LIEAP) in the past rolling 15 years. An exception is allowable for a unit, which has been weatherized in the previous 15 years, 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. Historical WMS and Hancock records will be referenced for previous weatherization activity when determining household eligibility. All reweatherized units must meet current weatherization standards on completion.

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 allowable incidental repairs, 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, or authorized agent, 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:

The term “deferral” describes when an otherwise income eligible client cannot receive weatherization services due to certain occupant issues or dwelling characteristics that are beyond the scope of WAP. 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, any applicable referrals, 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. A copy of the deferral letter must be provided to the client and a copy retained in the client file. All deferred weatherization applications and jobs shall be entered into the Hancock system and the corresponding deferral reason selected from the available options. Deferred clients remain income eligible and do not need to be recertified unless their income certification date lapses. Clients should be provided a list of potential resources or referrals to other programs to assist in correcting the deferral.

*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 significant 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.

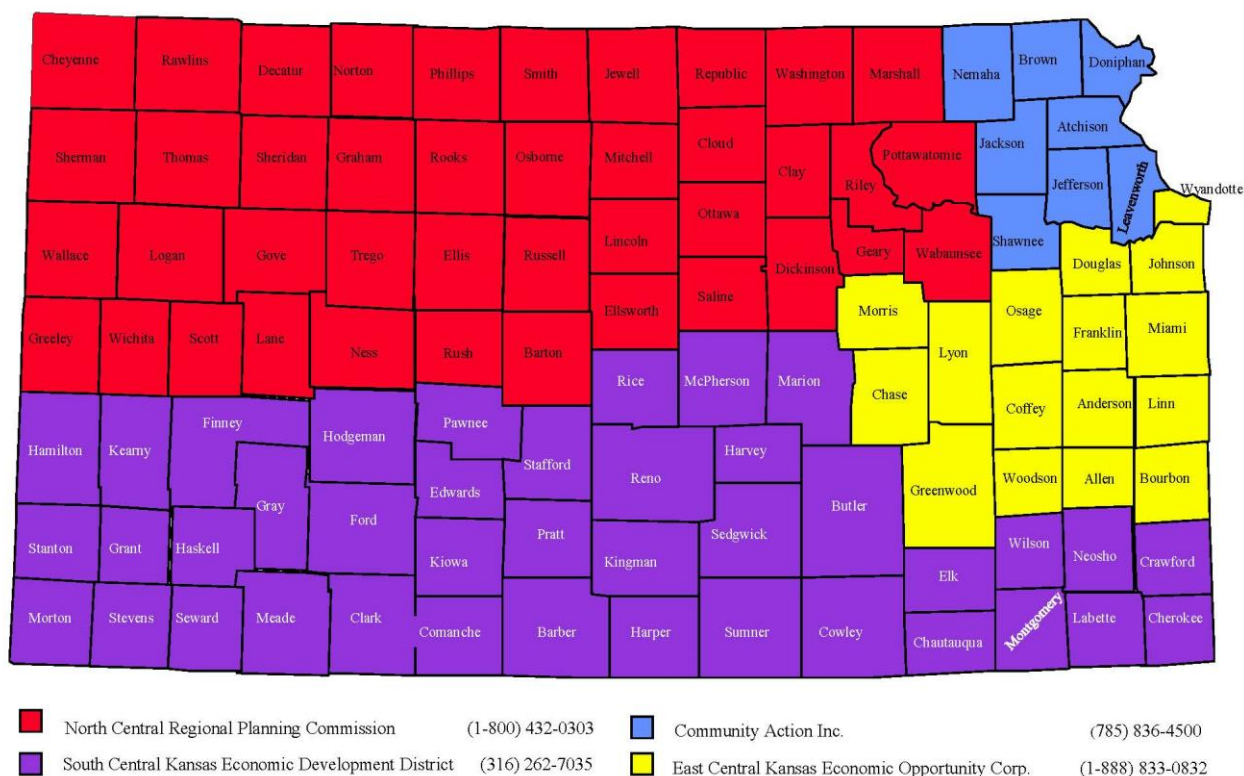
The WAP Subrecipient Procedure Manual describes procedures for the state’s response to Subrecipient noncompliance, including recoupment or reduction of funding, subgrant probation, and subgrant termination.

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 2016-2020 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. Funds may be reallocated to those high performing subrecipients that demonstrate a commitment to meeting or exceeding quarterly production and spending targets. 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

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

If applicants are not elderly, disabled, or members of families with children 18 years old or under, they may also be prioritized if they qualify as high residential energy users or a household with a high energy

burden. Clients are given the option, but are not required, to provide energy-related utility bills for intake staff to calculate the household's energy usage and burden.

High energy users are households who's previous 12-month energy use exceeds: 100 MCF of natural gas, 10,000 kWh for electricity, or 800 gallons of propane.

High energy burden households are those households where overall annual energy costs are equal to or greater than 15% of the household's annual income. The same 12-month period for determining income eligibility and annual energy bills will be used when calculating burden.

Weatherization Subrecipients are sensitive to the issues of high-energy burden and high residential fuel usage. The State of Kansas continues to explore ways to establish these categories for use in identifying priorities, however consistently and efficiently obtaining utility bill information from the numerous investor-owned, cooperative, and municipal utilities across the state remains a programmatic barrier and client application hurdle.

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.

V.4 CLIMATIC CONDITIONS

The climatic conditions in Kansas range across the state. The table below show the average heating degree days and the average cooling degree hours for four primary weather stations across the state. These values are from ASHRAE Fundamentals Std 169-2013 and are imbedding in our energy auditing software. The REM/Design audit utilizes the four provided climatic zones to factor in climatic variances within the state and in its analysis of cost effectiveness

Location	HDD, base 65F	CDH, Base 74F
Dodge City	4880	16573
Goodland	5782	12121
Topeka	4929	12924
Wichita	4464	18215

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.

Energy Conservation Measures (ECMs) approved in Kansas, as justified by an individualized REM/Design audit, H&S policy, or GHW list, include:

1. Insulating foundation walls up to R-19
2. Insulating slab edge insulation up to R-10
3. Insulating frame floors over unconditioned areas up to R-30
4. Insulating cantilevered floors over ambient air up to R-30
5. Insulating rim joists up to R-13
6. Insulating side wall cavities (dense pack and/or batt as applicable)
7. Insulating attic knee-walls up to R-19
8. Insulating attic floors up to R-38
9. Dense packing roof slopes cavities
10. Installation of interior or exterior storm windows over single-glazed windows
11. Replacing primary windows
12. Replacing exterior grade doors
13. Measures to reduce air infiltration
14. Insulating ductwork
15. Tuning heating and cooling equipment
16. Replacing fossil fuel fired heating equipment
17. Replacing electric HVAC systems with heat pumps
18. Replacing air conditioner
19. Installation of a smart thermostat
20. Refrigerator replacement
21. Installation of LED lamps and fixtures
22. Diagnostic combustion appliance testing.
23. Necessary health and safety repairs.
24. Necessary repairs or replacement of water heater.
25. Installation of other measures necessary to protect installed weatherization materials.
26. 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.

All weatherization ECM 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 22-4, 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 and manufactured housing is approved for use through June 16, 2026. The approved SWS field guide is also utilized and 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 the following language which clearly communicates the expectation for quality work and the requirement to be in compliance with the Kansas SWS Field Guide: “The Weatherization Assistance Program is dedicated to a high quality of work. To ensure this quality, all work performed by subrecipients, contractors, and subcontractors must meet the desired outcomes, specifications, and objectives found in the Kansas SWS Field Guide. This Agreement constitutes confirmation of receipt and understanding of the expectations of 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 22-1 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 conditionally approved through February 26, 2026. 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, air sealing the attached garage wall, 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. It is not permissible to omit cost justified ‘major measures’ vital to the success of the weatherization job. Major measures are as follows: air sealing, duct sealing of ducts outside the thermal boundary, attic insulation, wall insulation, and floor or belly insulation.

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 Approved by DOE</u>
Single-Family	REM/Design audit (February 26, 2021)
Manufactured Housing	REM/Design audit (February 26, 2021)
Small Multi-Family	REM/Design audit (February 26, 2021)
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 certifies that the 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 contain the QCI's printed name, signature, certification number and date. The inspection must include an assessment of the energy audit that confirms the accuracy of the field site data collection, energy audit software inputs, and 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 Energy Auditing Procedures and Kansas SWS Field Guide. In situations where

inspectors are found not upholding the high quality of work expectations or are approving work, which is not consistent with the Kansas SWS Field Guide, inspectors and subrecipients will be notified in writing. Corrective action plans may be required to be developed and implemented based on the severity and frequency of non-compliance. Increased monitoring may be required. Concerns will be tracked to resolution. Repeat offenders may be suspended or disqualified from conducting final inspections for the K-WAP.

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 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 follow the maximum 15% administrative limit including the flexibility for additional admin for those subrecipients receiving grants less than \$350,000. Not more than 7.5% may be used by KHRC for admin, and not less than 7.5% will be made available to Subrecipients. A direct split is common. To ensure the compliance of the 15 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.

Subrecipients funded at less than \$350,000 of DOE funds, may request and receive up to an additional 5% for administration with written justification, with state approval based on the individual need and justification. The total effect of the additional 5% may result in the State exceeding the 15% administration cap for the award.

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 38% 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, virtual, or hybrid 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 Specialists 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. The client file for monitored homes will have a form added that certifies that the unit was monitored and that all work met the required standards. The form will contain the monitor's printed name, signature, and QCI certification number and date. 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 one- to three-day on-site, virtual, or hybrid 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 2022 program year follows:

<u>Subrecipient</u>	<u>Date</u>
CAI	February 21-23
ECKAN	May 23-25
NCRPC	April 25-27
SCKEDD	March 13-16

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

See attached T&TA plan template.

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 2022 Program Year follow:

First Quarter (July- September):

- Kansas Weatherization Directors' Meeting July 2022
- Kansas Housing Conference August 30-Sept 1, 2022
- NASCSP Annual Conference September 2022
- QCI/Energy Auditor Certification, as needed

Second Quarter (October — December):

- Kansas Weatherization Directors' Meeting October 2022
- 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 2023
- On-site T&TA, as needed
- Kansas State Plan Development Meetings Jan/Feb 2023

Fourth Quarter (April — June):

- PAC Meeting April 2023
- Kansas Weatherization Directors' Meeting April 2023
- On-site T&TA, as needed
- Inspector's Retreat - TBA

Estimated breakdown of activities planned:

Percent of overall training:

- Comprehensive Trainings: 37%
- Specific Trainings: 63%

Breakdown of T&TA training budget:

- Percentage of budget allocated to Auditor/QCI trainings: 53%
- Percentage of budget allocated to Crew/Installer trainings: 16%
- Percentage of budget allocated to Management/Financial trainings: 31%

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, as issued by federal, state, or local officials, offers Subrecipients the opportunity to use existing procedures to prioritize weatherization for income qualified households within the impacted territory. 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, may be prioritized as a second consideration to the priorities set forth in section V.3 Priorities.

During an energy crisis, K-WAP Subrecipients may consider any income qualified 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+.
- 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.

TRAINING AND TECHNICAL ASSISTANCE (T&TA) PLAN TEMPLATE

1.0 – GENERAL INFORMATION

COMMENTS THAT DO NOT GENERALLY FIT INTO THE AVAILABLE TABLES BELOW

ENTER ADDITIONAL H&S INFORMATION HERE

2.0 – OVERALL T&TA PLAN

YOUR OVERALL T&TA PLAN MUST INCORPORATE SUGGESTIONS AND FEEDBACK THE FOLLOWING ELEMENTS.

FEEDBACK FROM INTERNAL AND EXTERNAL REVIEWS, EXAMPLES INCLUDE:

- FEEDBACK FROM DEPARTMENT OF ENERGY (DOE) PROJECT OFFICER (PO) MONITORING VISITS
- INTERNAL STATE AUDITS
- GRANTEE MONITORING OF THE SUBGRANTEES
- OFFICE OF INSPECTOR GENERAL (OIG) REPORTS
- AMERICAN CUSTOMER SATISFACTION INDEX FEEDBACK, AND
- OTHER. EXAMPLES INCLUDE:
 - TRAINING FEEDBACK
 - TRAINING RETENTION ACTIVITIES

KWAP incorporates the following suggestions and feedback when developing the statewide T&TA Plan:

- Grant requirements
- Feedback from Department of Energy (DOE) Project Officers (PO) and monitoring reports
- Grantee Monitoring Reports of the Subrecipients
- Subrecipients submitted questions and training requests
- Quarterly Weatherization Director's meetings
- Annual inspector retreat
- Subrecipient feedback
- American Customer Satisfaction Index survey feedback
- Public Comment received during the Public Comment period for the DOE State Plan
- WAP PAC feedback

EXISTING OR PLANNED ACCREDITED TRAINING CENTER PARTNERSHIP OR WORKING RELATIONSHIP.

KHRC and Subrecipients have historically partnered with Santa Fe Community College's EnergySmart Academy (SFCCEA) to provide IREC accredited comprehensive trainings. Additionally, SFCCEA has helped KHRC with the recent development of SWS field guide.

PREPARATIONS FOR FUTURE/UPCOMING PROGRAM REQUIREMENTS, EXAMPLES INCLUDE:

- **UPDATED STANDARD WORK SPECIFICATIONS (SWS)**
- **MIGRATION TO ONLINE WEATHERIZATION ASSISTANT**
- **INCLUSION OF SPECIFIC LANGUAGE FROM WEATHERIZATION PROGRAM NOTICES (WPN)**

The Kansas SWS Field Guide was updated and became effective on July 1, 2021. Although the field guide was recently updated, a list of wanted additions have been and will continue to be compiled for future editions. KHRC includes specific updated language from Weatherization Program Notices (WPNs) on an as-needed basis and as released.
WHAT PROTOCOLS ARE IN PLACE WHICH ENSURE UNTRAINED STAFF ARE NOT LEFT WITHOUT SUPERVISIONS DURING FIELD OPERATIONS?
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. 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.
PARTNERSHIPS WITH THE STATEWIDE HOME PERFORMANCE INDUSTRY ON TRAINING ISSUES; IF APPLICABLE.
KHRC does not currently partner with any statewide home performance industries.
HOW DOES ANALYSIS CONDUCTED, AS DETAILED IN SECTION V.6 OF THE ANNUAL APPLICATION, INFLUENCE THE DEVELOPMENT OF T&TA ACTIVITIES AND PRIORITIES?
T&TA activities and priorities are influenced and directed by multiple measures. Onsite and desktop monitoring 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 reviews 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, high level, desk top review of reported jobs enables the grantee to analyze Subrecipient performance and productivity and can help identify T&TA needs. Annually, KWAP does an analysis of air sealing effectiveness based on 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. The annual T&TA report and Subrecipient monitoring analysis overview also provides a mechanism to identify strengths, weaknesses, and T&TA needs.

3.0 – WORKFORCE CREDENTIALS

DESCRIBE THE FOLLOWING ASPECTS OF YOUR T&TA PLAN RELATED TO WORKFORCE CREDENTIALS.

FEDERALLY REQUIRED CREDENTIALS. EXAMPLES INCLUDE:

- ENVIRONMENTAL PROTECTION AGENCY LEAD RENOVATION, REPAIR, AND PAINTING PROGRAM
- HOME ENERGY PROFESSIONALS’ QUALITY CONTROL INSPECTOR CERTIFICATION

Federally Required Credentials:

• Kansas Department of Health and Environment (KDHE) Lead Renovator Certification (RRP). KDHE standards are more stringent than the EPA standards. • Home Energy Professionals Quality Control Inspector (QCI) certification for all final inspectors. • Home Energy Professionals Energy Auditor (EA) certification is required for all final inspectors and energy auditors after an initial probationary period.
GRANTEE/STATE REQUIRED CREDENTIALS. EXAMPLES INCLUDE: • BUILDING PERFORMANCE INSTITUTE BUILDING ANALYST • GRANTEE-DEVELOPED CERTIFICATIONS
KWAP Certification: Since 1995, the Kansas Weatherization Assistance Program has maintained an inspector training and certification program for all individuals who conduct pre- or post-weatherization inspections. Beginning in 2018, a multitrack, tiered training and certification scheme was introduced. Comprehensive training for auditors and inspectors is essential for sound decision-making in the field. Training is provided through a combination of field, classroom, and online training. Competency is assessed through written and field testing and the obtaining, and maintaining, of industry certifications. Upon successful completion of the training components, auditor candidates are required to submit three probationary weatherization audits to KHRC for review. Upon successful completion of the three sample audits, auditor candidates complete an infield evaluation to demonstrate competency in the entire weatherization auditing process ranging from client interview to the final results of the REM/Design energy audit and weatherization work order. Successful candidates receive an 18-month probationary certification allowing them to conduct initial energy audits independently. Within 18- months individuals must obtain full certification status by obtaining the BPI HEP Energy Auditor Certification.
SUBGRANTEE/LOCAL REQUIRED CREDENTIALS. EXAMPLES INCLUDE: • CONTRACTOR LICENSING
Subrecipient/Local required credentials: • State Contractor Licensing for required services, i.e., HVAC, plumbing, electrical, etc., where applicable • Worker safety training, such as OSHA 10 Construction Safety Course.
INDUSTRY REQUIRED CREDENTIALS. EXAMPLES INCLUDE: • EQUIPMENT/MATERIAL MANUFACTURE CERTIFICATION • VENDOR CERTIFICATION (E.G. EQUIPMENT/MATERIAL MANUFACTURE CERTIFICATION, VENDOR CERTIFICATION)
NA
PROCESS FOR MAINTAINING WORKFORCE CREDENTIALS
KWAP auditors are required to obtain, and maintain, their BPI Energy Auditor Certification and receive comprehensive JTA aligned training. Comprehensive training will be closely aligned with credentialing requirements for the given task (i.e., energy auditor or QCI). Auditor and inspector training is 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 timetable is consistent and conducive to receiving intensive training in anticipation of re-certifications exams. In addition to the BPI certifications, individuals are required to maintain their Kansas Weatherization Assistance Program (KWAP) Certification. This certification will be based on a three-year cycle and will be awarded after individuals receive their first BPI HEP certification (either Energy Auditor or QCI). The KWAP Certification allows individuals to work independently within the Kansas Weatherization Program. The KWAP certification will be suspended or terminated when individuals lapse in either their comprehensive training plans or BPI HEP certifications. KWAP certification may be suspended or terminated if state specified mandatory trainings are not completed.

KDHE RRP certifications are valid for 5 years.

HOW CREDENTIALS ARE TRACKED

KHRC tracks credentials during annual Programmatic Monitoring.

4.0 – TRAINING

GRANTEES HAVE TWO OPTIONS TO DESCRIBE THEIR TRAINING.

- A) USE THE EMBEDDED SPREADSHEET* TO IDENTIFY AND DESCRIBE THE TRAINING SCHEDULE FOR GRANTEE AND SUBGRANTEE STAFF. INCLUDE TECHNICAL AND NON-TECHNICAL TRAINING.
- B) OR USE THE FIELDS BELOW TO IDENTIFY AND DESCRIBE THE TRAINING SCHEDULE FOR GRANTEE AND SUBGRANTEE STAFF. INCLUDE TECHNICAL AND NON-TECHNICAL TRAINING.

GRANTEE'S ARE TO INCLUDE THE FOLLOWING IN THEIR DESCRIPTIONS REGARDLESS OF WHAT OPTION IS BEING USED TO DESCRIBE THEIR TRAINING PLAN:

- SPECIFY WHETHER ATTENDANCE IS MANDATORY, AND THE RAMIFICATIONS FOR NON-COMPLIANCE.
- SPECIFY IF THE T&TA PLAN SPANS MULTIPLE PROGRAM YEARS (PY), INDICATE WHICH TRAININGS ARE INTENDED IN THE CURRENT PY AND WHICH ARE PLANNED FOR FUTURE PYs.

* THE EMBEDDED SPREADSHEET, IF COMPLETED AT THE END OF THE YEAR TO RECORD DELIVERED TRAINING, CAN BE USED AS DOCUMENTATION FOR THE REQUIRED ANNUAL T&TA REPORT. DOUBLE CLICK TO OPEN SPREADSHEET. ENTER INFORMATION AND CLOSE. IT WILL AUTOMATICALLY SAVE YOUR INFORMATION



TTA Planning and Reporting Template F

PROGRAMMATIC/ADMINISTRATION TRAINING

- FINANCIAL (I.E., 2 CFR 200)
- MANAGEMENT (I.E., 10 CFR 440)
-

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.

K-WAP staff will attend DOE mandated activities/events, NASCSP events, State Weatherization Directors' meetings, national DOE sponsored conferences, OMB/Wipfli trainings, and other staff development trainings as needed or required. Continuing education and conference attendance ensure Grantee effectiveness in administering and implementing the grant.

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.

COMPREHENSIVE TECHNICAL TRAINING ALIGNED TO THE JOB TASK ANALYSIS (IDENTIFY AT WHAT INTERVALS WORKERS WILL RECEIVE REGULAR, COMPREHENSIVE TRAINING AS REQUIRED BY WEATHERIZATION PROGRAM NOTICE (WPN) 15-4)

- QUALITY CONTROL INSPECTOR
- ENERGY AUDITOR
- CREW LEAD
- RETROFIT INSTALLER/TECHNICIAN

In accordance with WPN 22-4, T&TA activities for WAP field staff are to be designed as Comprehensive or Specific training. Comprehensive training is occupation specific training which is part of an overall curriculum aligned with the topics within the given JTA being trained. Comprehensive training must be administered by, or in cooperation with, a training program that is IREC accredited. Specific training is single issue or issue specific, short-term trainings to address specific skills or knowledge gaps. Conference trainings and any training not aligned with a JTA are included in this category.

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 training will be closely aligned with credentialing requirements for the given task (i.e., energy auditor, QCI, multifamily 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 timetable is consistent and conducive to receiving intensive training in anticipation of re-certifications exams. Comprehensive 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 training will be obtained on an as-needed basis and on a rolling basis to fulfill certification CEU requirements.

Comprehensive 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 and can be a hybrid of distance learning and/or 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 training.

Attendance in training is mandatory as announced. Non-compliance may result in elevated risk status, state certification suspension, or contract termination.

SPECIFIC TECHNICAL TRAINING

- TOPICS IDENTIFIED DURING MONITORING VISIT(S)
- ENERGY MODELING
- HEALTH & SAFETY. ALL H&S TOPICS IN WPN 22-7 REQUIRE SOME LEVEL OF TRAINING FOR ALL AFFECTED WORKERS, THE FREQUENCY OF THIS TRAINING IS A GRANTEE DECISION. EXAMPLES INCLUDE:
 - AIR CONDITIONING AND HEATING SYSTEMS
 - ASBESTOS
 - BIOLOGICALS AND UNSANITARY CONDITIONS
 - BUILDING STRUCTURE AND ROOFING

- CODE COMPLIANCE
- COMBUSTION GASES
- ELECTRICAL
- FORMALDEHYDE, VOLATILE ORGANIC COMPOUNDS (VOCs), FLAMMABLE LIQUIDS, AND OTHER AIR POLLUTANTS
- FUEL LEAKS
- GAS RANGE/OVENS
- HAZARDOUS MATERIALS DISPOSAL
- INJURY PREVENTION OF OCCUPANTS AND WEATHERIZATION WORKERS
- LEAD BASED PAINT
- EPA’S LEAD RENOVATION, REPAIR & PAINTING PROGRAM (RRP)MOLD/MOISTURE
- PESTS
- RADON
- SAFETY DEVICES
- VENTILATION AND INDOOR AIR QUALITY
 - AMERICAN SOCIETY OF HEATING REFRIGERATION AND AIR-CONDITIONING ENGINEERS (ASHRAE)
- WINDOW REPAIR, DOOR REPAIR
- WORKER SAFETY
 - OSHA
- ADDITIONAL TOPICS AS DESCRIBED IN HEALTH & SAFETY PLAN
- CLIENT EDUCATION (TRAINING WORKERS TO CONDUCT CLIENT EDUCATION). EXAMPLES INCLUDE:
 - ENERGY SAVINGS STRATEGIES
 - PROGRAM-SPECIFIC INFORMATION. EXAMPLES INCLUDE:
 - WHAT TO EXPECT
 - ADDITIONAL RESOURCES
 - HEALTH & SAFETY ISSUES

Specific T&TA is provided as a regular component of fiscal, programmatic, and technical monitoring.

Quarterly weatherization directors’ meetings and annual inspector retreats are preferred mechanism to address areas of common concern with regard to training and policy for current initiatives and future program requirements. Additional T&TA needs will be identified through feedback from these events.

Annual updates to the State Plan and Subrecipient Procedure Manual provide opportunities to gather network staff and provide specific training and program updates. Mandatory trainings are provided when technical guides (i.e., SWS) and policies and procedures are updated (i.e., H&S policy, energy audit procedures).

Additional, specific training will be provided on an as-needed basis. The specific need and technical expertise required will determine the training provider. State technical staff, state and national training providers, or network partners 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.

CONFERENCES. EXAMPLES INCLUDE:

- ENERGY OUTWEST
- BUILDING PERFORMANCE ASSOCIATION
- NATIONAL ASSOCIATION FOR STATE AND COMMUNITY SERVICE PROVIDERS
- COMMUNITY ACTION PARTNERSHIP

K-WAP staff will attend DOE mandated activities/events, NASCSP events, State Weatherization Directors’ meetings, national DOE sponsored conferences, OMB/Wipfli trainings, and other staff development trainings as

needed or required. Continuing education and conference attendance ensure Grantee effectiveness in administering and implementing the grant.

OTHER, PLEASE SPECIFY:

5.0 – TECHNICAL ASSISTANCE

DESCRIBE THE TECHNICAL ASSISTANCE ACTIVITIES INCLUDED IN THE T&TA BUDGET CATEGORY.

PROGRAMMATIC/ADMINISTRATION SUPPORT

Programmatic and administrative support is readily available through onsite, written, and telephone communication with Subrecipient staff as requested.

KHRC meets with subrecipients quarterly to discuss emergent issues. This type of communication helps maintain consistency in the services provided throughout the state. Each of these meetings will serve a core group of the weatherization workforce, in addition to including a gathering of program directors to discuss the program. These meetings include a Program Director and, when necessary, staff discussion covering a specific topic, including fiscal, administrative, and technical issues.

TECHNICAL SUPPORT

Technical Support is readily available and provided to subrecipient staff through the following methods:

- Questions and/or technical assistance is continuously available for all subrecipient staff with a simple phone call. Discussions are followed up with an email that summarizes the discussion as necessary. Questions asked on multiple occurrences may require an addition to the SharePoint frequently asked question (FAQ) section.
- Virtual support is provided utilizing platforms such as Microsoft Teams, FaceTime, etc.
- Subrecipient onsite or network trainings
- KHRC maintains a SharePoint site for technical resources, templates, training videos, and FAQs.

Additional technical support methods are created/utilized on an as-needed basis to improve program administration, effectiveness, and delivery of services.

HEALTH & SAFETY SUPPORT ACTIVITIES

H&S support is readily available and provided to subrecipients staff through the following methods:

- Questions and/or technical assistance is continuously available for all subrecipients with a simple phone call. Discussions are followed up with an email that summarizes the discussion, as needed. Questions asked on multiple occurrences may require an addition to the SharePoint frequently asked questions (FAQ) section.
- Virtual support is provided utilizing platforms such as Microsoft Teams, FaceTime, etc.
- Subrecipient onsite or network trainings
- KHRC maintains a SharePoint site for technical resources, templates, training videos, and FAQs.

MONITORING

WHAT PERCENTAGE OF T&TA FUNDING IS ALLOCATED TO MONITORING? (IF DEFINED IN SECTION B OF THE BUDGET DETAILS WITHIN THE ANNUAL APPLICATION, INCLUDE THAT WITHIN YOUR DESCRIPTION BELOW.)

Approximately 38% of the Grantee T&TA funds will be allocated for program oversight and travel by state monitors.

OTHER, PLEASE SPECIFY

6.0 CLIENT EDUCATION

DESCRIBE WHAT CURRENT AND PLANNED CLIENT EDUCATION MATERIALS AND/OR ACTIVITIES ARE INCLUDED IN THE T&TA BUDGET CATEGORY. ONLY THOSE PAID FOR WITH T&TA FUNDS NEED TO BE MENTIONED.

NOTE: THIS DOES NOT INCLUDE TRAINING WORKERS TO DELIVER CLIENT EDUCATION. THIS SHOULD BE DESCRIBED IN THE TRAINING SECTION, ABOVE.

CLIENT EDUCATION ACTIVITIES PRIOR TO, DURING AND AFTER WEATHERIZATION WHICH ADDRESS THE WEATHERIZATION PROCESS AND ENERGY SAVINGS DETAILS

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. At the post inspection clients receive and sign a Weatherization Maintenance Recommendations and Client Education Form that provides general education and maintenance recommendations for items in their home. 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.

KHRC and subrecipients also try to participate in state energy expos or outreach events in which client education is provided.

CLIENT EDUCATION ACTIVITIES REGARDING H&S ISSUES AS INDICATED IN WPN 22-7

- AIR CONDITIONING AND HEATING SYSTEMS
- ASBESTOS
- BIOLOGICALS AND UNSANITARY CONDITIONS
- BUILDING STRUCTURE AND ROOFING
- CODE COMPLIANCE
- COMBUSTION GASES
- ELECTRICAL
- FORMALDEHYDE, VOLATILE ORGANIC COMPOUNDS (VOCs), FLAMMABLE LIQUIDS, AND OTHER AIR POLLUTANTS
- FUEL LEAKS
- GAS RANGE/OVENS
- HAZARDOUS MATERIALS DISPOSAL
- INJURY PREVENTION OF OCCUPANTS AND WEATHERIZATION WORKERS
- LEAD BASED PAINT
- EPA'S LEAD RENOVATION, REPAIR & PAINTING PROGRAM (RRP)MOLD/MOISTURE
- PESTS
- RADON
- SAFETY DEVICES
- VENTILATION AND INDOOR AIR QUALITY
 - AMERICAN SOCIETY OF HEATING REFRIGERATION AND AIR-CONDITIONING ENGINEERS (ASHRAE)
- WINDOW REPAIR, DOOR REPAIR
- WORKER SAFETY
 - OSHA
- ADDITIONAL TOPICS AS DESCRIBED IN HEALTH & SAFETY PLAN

Health and safety client education is provided by intake staff, energy auditor, contractors, and final inspectors as questions and topics are address throughout service delivery. Client are required to review and sign the Occupant Pre-existing or Potential Health Condition Screening form, the Hazard Identification Notification form, the Radon Informed Consent Form, and the Lead Safe RRP Pamphlet. The following additional topics may also be covered as applicable:

- Appropriate use and maintenance of HVAC units.

- Hazards of disturbing suspect asbestos containing materials
- Any combustion safety concerns, including carbon monoxide and gas leaks
- Mold and moisture issues
- Proper use and requirements of ASHRAE ventilation.

DRAFT

Weatherization Grantee Health and Safety (H&S) Plan- *Optional Template*

Grantee Name

1.0 – GENERAL INFORMATION

Additional information that does not fit neatly in one of the other sections of this document.

Enter Additional H&S Information Here

2.0 – BUDGETING

Grantees are encouraged to budget H&S costs as a separate category and, thereby, exclude such costs from the Average Cost Per Unit (ACPU) cost limitation. This separate category also allows these costs to be isolated from energy efficiency costs in program evaluations. H&S costs that 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 Grantee's Department of Energy (DOE)-approved energy audit tool.

Select which option used below.

Separate H&S Budget ☒

Contained in Program Operations ☐

3.0 – H&S EXPENDITURE LIMITS

Pursuant to [10 CFR 440.16\(h\)](#), Grantees must establish H&S expenditure limits for their Program and provide justification for those limits by explaining the basis and related historical H&S expenditures. DOE acknowledges that it may be necessary for Grantees to deviate from historical expenditures when certain circumstances arise (e.g., funding source changes).

[10 CFR 440.16\(h\)\(2\)](#) dictates that these limits must be expressed as a percentage of the ACPU. To calculate this percentage, use the following formula:

$$\text{Total Average H\&S Cost per Unit} = \frac{\text{H\&S budget amount}}{\text{Program Operations budget amount}}$$

For example, if the ACPU is \$5,000 and a Grantee's Program expends an average of \$750 per dwelling on energy-related H&S measures, the Total Average H&S Cost per Unit would equal 15 percent. DOE acknowledges that this percentage may vary significantly between Grantees due to different geographical areas and depending upon the availability of other funding sources, resource availability, etc. Low percentages should include a statement of what other funding supports H&S costs, while larger percentages will require greater justification and relevant historical support.

15 percent is not a maximum limit on H&S expenditures. DOE will conduct a secondary level of review on H&S Plans with a Grantee request of more than 15 percent of Program Operations used for H&S purposes. **DOE strongly encourages using the table below in developing justification for the requested H&S budget amount.** In accordance with [10 CFR 440.18\(d\)\(15\)](#), these funds are to be expended by the Program in direct weatherization activities, "of which is necessary before, or because of, installation of weatherization materials." This same section of the regulation excludes the H&S costs from the ACPU limitation if H&S costs are budgeted separately.

DOE recommends reviewing recent budget requests and compare those to actual H&S 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 annual plan.

H&S expenditure limits and justification explaining the basis for setting the limits.

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 low. However, the demand for those more flexible, non-federals has shifted from covering H&S expenses to being needed to help address major deferral issues, such as roof repairs. As such, DOE's share of H&S costs, as well as an overall increase in H&S costs, is increasing the need to budget a higher H&S budget.

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 PY22 and supports a H&S budget near 20%.

Utilizing the spreadsheet embedded below, provide a full list of H&S measures using historical data from your program, including average cost, and frequency rate. If installing more than a single instance of one measure in a unit (e.g. multiple CO alarms), Grantees may aggregate costs so that frequency does not exceed 100%, or enter a justification into the measure column, which explains why that measure has a frequency rate of over 100%. The spreadsheet will auto calculate your expected Total Average H&S Cost per Unit.

Instructions: Double-click icon directly below to open, view and edit Measure Matrix Spreadsheet. Complete the spreadsheet by entering the required information. To save, close the spreadsheet and it will save to this document.



Measure Matrix
Final.xlsx

4.0 – INCIDENTAL REPAIR MEASURES

Any measures that could potentially be identified as H&S, but the Grantee chooses to instead identify and treat those measures as incidental repair measures (IRMs), must be implemented consistently throughout the Grantee's weatherization program. The measure must fit the regulatory definition of an IRM and be cost justified along with the associated energy conservation measure and/or package of measures. [10 CFR 440.3](#) defines Incidental Repairs as, "those repairs necessary for the effective performance or preservation of weatherization materials."

H&S measures identified and treated as IRMs within your Program.

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 following IRM rules when the cost is associated with the ECM.

5.0 – OCCUPANT PRE-EXISTING OR POTENTIAL HEALTH CONDITIONS AND HAZARD IDENTIFICATION AND NOTIFICATION FORM(S)

Grantees must develop a written policy that includes, at a minimum, the following documentation relating to H&S Plan implementation and maintain signed copies in each client file. Each notification must include the occupant(s) (and landlord if applicable) name and address, be signed and dated by the occupant (and landlord if applicable) indicating that they understand and have been informed of their rights and options and signed by the Subgrantee personnel collecting the information.

Required topics are:

▪ **Occupant Pre-existing or Potential Health Condition Screening**

- Provides documentation that allows occupant(s) to self-report known or suspected health concerns as part of initial application for weatherization, during the energy audit, or other part of the weatherization process as specified. Must minimally contain the following:
 - Any known risks associated with the measures and materials being installed
 - Subgrantee point of contact information for occupant(s)
 - Date of screening

▪ **Hazard Identification Notification**

- Provides documentation that the occupant and landlord (if applicable), have been informed of any potential hazards identified during the energy audit or intake process. Must minimally contain the following:
 - Date(s) of the energy audit/assessment and when the occupant(s) (and landlord, if applicable) was informed of a potential H&S issue
 - A clear description of the problem, including any testing results
 - A statement indicating if, or when weatherization could continue

Radon Informed Consent Form

- Provides documentation that the occupant(s) (and landlord if applicable) have been informed of any potential hazards associated with radon in weatherized dwellings. The form must minimally contain the following:
 - An explanation on the potential small risk of increasing radon levels when building tightness is improved. This is based on the results of the [Buildings Assessment of Radon Reduction Interventions with Energy retrofits Expansion Study \(The BEX Study\)](#)
 - A list of precautionary measures WAP will install based on [EPA Healthy Indoor Environment Protocols](#).
 - Some of the benefits of Weatherization including energy savings, energy cost savings, improved home comfort, and increased safety.

Procedure for soliciting occupants' health and safety concerns related to components of their homes

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.

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.

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.

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.

Procedure for determining whether occupants suffer from health conditions which may be negatively impacted by the act of weatherizing their dwelling

See above.

Procedure for addressing potential health concerns including pre-existing health conditions when they are identified

See above

Location where forms have been uploaded/submitted

Separate attachment to SF424 ☒

Separate attachment to H&S Plan ☐

6.0 – HEALTH AND SAFETY CATEGORIES

For each of the following H&S categories identified by DOE in the following tables, follow the directions below.

- Any section that is “Required” below must be explicitly detailed in the H&S Plan regardless of funding source used. If the Grantee checks the box for “Concurrence with DOE Guidance” the contents of the box may be left as it exists or reference the section/location within Grantee Policy and Procedure manual that contains language or insert Grantee specific language. If the “Alternative Guidance” box is checked, the Grantee must provide that alternative guidance in the box.
 - If a Grantee is proposing an alternative action/allowability for a “Required” item, the alternative requires comprehensive explanation of how it meets the intent of the DOE program notice.
 - If a “Required” item/category will not be addressed with any funding source and will always result in deferral, the H&S Plan must state that.
- Any section that is “Allowable” below must be detailed only if DOE WAP funds are used to implement the measures. If the Grantee uses DOE funds for any “Allowable” activities from the Table of Issues then they must be described here in detail, including defining “minor”, “major”, “limited”, “case-by-case”, and “at-risk” if the term is applied. If you only check the box “Allowed with Alternative Funds” then no additional information is required.
- Any section that is “Prohibited” below may not be addressed with DOE WAP H&S funds and does not need to be specifically addressed in the H&S Plan. The Grantee simply needs to check the “Concur with DOE guidance” box and indicate if the condition will result in deferral/referral.
- The Grantee H&S Plan may address additional H&S hazards specific to their program that are not included in the Table of Issues. If a Grantee chooses to include additional measures as DOE WAP funded H&S costs, the H&S Plan must include details pertaining to the measures allowed, testing required, and client education for these specific hazards.
- All required “Testing/Inspection” related items must be documented in the client file to verify completion and results.

6.1 – Air-Conditioning, Heating Systems, and Combustion Appliances

Required Actions

Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☒	Alternative Funds ☒	

- Replace, repair, or install primary heating systems when existing primary heating systems are unsafe, inoperable, or nonexistent. No home may be left without a safe primary heating system after weatherization where climate conditions require heating (i.e., all climate zones except zone 1 as defined by ASHRAE). If unable to meet this requirement, deferral is required.
- No DOE-funded weatherization work is permitted if the completed dwelling unit will be heated with an unvented combustion space heater as the primary heat source. The primary heat source must be replaced with a vented unit prior to or by weatherization. The replacement unit must be sized to heat the entire dwelling unit.
- Unsafe secondary units, including space heaters, must be repaired, or removed and disposed of, or deferral is required. Secondary unvented space heaters are considered unsafe if they:
 - are not listed and labeled as meeting ANSI Z21.11.2;
 - have an input rating of more than 40,000 BTU/hour;
 - are in a bedroom and have an input rating of more than 10,000 BTU/hour;
 - are in a bathroom and have an input rating of more than 6,000 BTU/hour;
 - are operating in an unsafe manner (e.g., high carbon monoxide (CO) readings, too close to combustible materials, lack sufficient combustion air volume);
 - or are not permitted by the Authority Having Jurisdiction (AHJ).
- DOE WAP Grantees must comply with the Manufactured Home Construction and Safety Standards which mandates that:
 - All fuel-burning appliances in manufactured homes except: ranges, ovens, illuminating appliances, clothes dryers, solid fuel-burning fireplaces and solid fuel-burning stoves, must be installed to provide for the complete separation of the combustion system from the interior atmosphere of the manufactured home (i.e., to draw their combustion air from outside), and be vented to outside the dwelling.
 - All appliances installed by or left in place after weatherization in manufactured homes must meet these standards, including secondary heating sources. If an occupant will not allow the removal of an unsafe combustion appliance from the home, deferral is required.
 - Repair or replace combustion gas venting to ensure proper combustion gas venting to outside the dwelling for all combustion appliances, including but not limited to gas dryers and refrigerators, furnaces, vented space heaters, and water heaters.
- If weatherization installs an appliance that is vented into a masonry chimney, the chimney must be lined in compliance with the International Fuel Gas Code (IFGC) or local AHJ if more stringent.
- Install adequate combustion air for all combustion appliances left after weatherization.
- If permits are required for heating/cooling system work, they must be secured and are a program operation cost if the installation is an ECM or may be included in the H&S cost if installed as a H&S measure.
- If unsafe conditions relating to existing combustion appliances require remediation to safely perform weatherization and cannot be remedied by repair or tuning, replacement is an allowable H&S measure unless prevented by other guidance herein.
- Documentation justifying the replacement with a cost comparison between replacement and repair must be maintained in the client file.

Allowable Actions

Allowed with DOE WAP H&S Funds ☒	Allowed with Alternative Funds ☒
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- 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. KHRC will require the review of pre-inspection and energy audit documents to evaluate if case by case H&S measures are appropriate and allowable for program expenditures.
- 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.
- Repair or removal of unsafe primary and secondary solid fuel heating appliances.

Prohibited Actions

Concur with DOE Guidance ☒

Using DOE WAP H&S funds for replacement or installation of secondary heat sources is prohibited.

Required Testing/Inspection

Concur with DOE Guidance ☐

Alternative Guidance ☒

- 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. 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.
- 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.
- Primary solid fuel-fired heating sources will be inspected using the appropriate mechanical inspection form. Visually inspect the entirety of solid fuel- fired appliance installations including the venting system to ensure it adheres to the applicable code or local authority having jurisdiction. Safety inspection should include, but are not limited to, verification of adequate floor protection, code-compliant clearances to walls and other combustible materials, and looking for visual evidence of soot on the walls, mantel or ceiling, or creosote staining near the flue pipe.
- 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.

- **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.

Grantee Combustion Testing Action Levels

Worst case depressurization and spillage testing is required for all atmospherically drafting appliances pre and post weatherization using the appropriate and required Kansas mechanical inspection form. Draft testing is also part of our procedures and is compared to minimum draft required (Temp/40)-2.75. Both warm and cold vented appliances must stop spillage within 2 minutes, meet or exceed the minimum draft requirements, and have passing CO measurements (200 PPM AF for water heaters, 400 PPM AF for furnaces, 450 for ovens).

Grantee Woodstove & Fireplace inspection/testing policy including actions/limits

Concur with DOE Guidance ☐

Alternative Guidance ☒

Venting on fireplaces or woodstoves used as primary heating sources that are left operational after weatherization must meet current local or national standards or the home must be deferred.

Required Occupant Education

Concur with DOE Guidance ☒

Alternative Guidance ☐

- Appropriate use and maintenance of units.
- Provide all paperwork and manuals for any equipment installed by weatherization.
- Discuss and provide information on proper disposal of bulk fuel tanks when not removed as part of the weatherization work.
- Where combustion equipment is present, provide combustion safety and hazards information including how to recognize depressurization, dangers of CO poisoning, and fire risks associated with combustion appliance use.

6.2 – Asbestos (Confirmed and/or Presumed Asbestos Containing Material)

Required Actions

Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☒	Alternative Funds ☒	
- When suspected friable Asbestos Containing Materials (ACM) are present, including vermiculite, assume they contain asbestos and take precautionary measures to prevent disturbing it during the audit and work unless testing determines otherwise. - Grantees must have written policy included in their H&S plan for: - Identifying and managing suspected ACM that provides for reasonable and necessary precautions to prevent asbestos contamination in the home. - Addressing blower door testing where suspected friable ACM is present (as defined by EPA), including vermiculite.		
Grantee ACM policy		
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. In siding, walls, ceiling, etc: 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. On pipes, furnaces, other small covered surfaces: 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 funds may be used for limited (<\$1000) testing, encapsulation, or removal of suspected ACM on small surfaces (pipes, ductwork, furnaces, other small covered surfaces, etc) by an appropriately licensed asbestos control professional if necessary to safely weatherize the dwelling. Testing is not required, and encapsulation and removal may occur of suspected ACMs. In vermiculite: 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. 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.		
Grantee Blower Door Testing Policy When Suspected ACM Exists		
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.		
Allowable Actions		
Allowed with DOE WAP H&S Funds ☒	Allowed with Alternative Funds ☒	

- Temporary removal and reinstallation of ACM siding to perform an ECM (e.g., wall insulation). - Limited (<\$1000) testing, encapsulation, or removal of suspected ACM on small surfaces (pipes, ductwork, furnaces, other small covered surfaces, etc) by an appropriately licensed asbestos control professional if necessary to safely weatherize the dwelling. Testing is not required, and encapsulation and removal may occur of suspected ACMs.		
Prohibited Actions		
Concur with DOE Guidance ☒		
Using DOE WAP H&S funds for general abatement/removal/or replacement of asbestos siding, thermal system insulation (TSI) or Transite, or vermiculite is prohibited.		
Required Testing/Inspection		
Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☒		Alternative Funds ☒
- Visually inspect all surfaces (i.e., walls, floors, ceilings, roofs) for suspected ACM prior to drilling or cutting. - Assume asbestos is present in suspect materials unless testing reveals otherwise.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds ☒		Allowed with Alternative Funds ☒
Limited (<\$1000) testing, encapsulation, or removal of suspected ACM on small surfaces (pipes, ductwork, furnaces, other small covered surfaces, etc) by an appropriately licensed asbestos control professional if necessary to safely weatherize the dwelling. Testing is not required, and encapsulation and removal may occur of suspected ACMs.		
Required Occupant Education		
Concur with DOE Guidance ☒		Alternative Guidance ☐
- Formally notify the occupant, and landlord if applicable, in writing: - of suspected ACMs that are present and what precautions will be taken to ensure the occupants' and workers' safety during weatherization; - of results if testing was performed; - not to disturb suspected ACM; - When deferral is necessary due to asbestos, occupant, or landlord if applicable, must provide documentation that a certified professional performed the remediation before work continues.		

6.3 – Biologicals and Unsanitary Conditions		
Required Actions		
Concur with DOE Guidance ☒	Alternative Guidance ☒	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☐		Alternative Funds ☐
Deferral where conditions (odors, bacteria, raw sewage, rotting wood, etc.) in the home pose a health risk to occupants and/or weatherization workers or may be worsened by weatherization activities (e.g., air sealing) and will not be resolved by weatherization.		
Allowed Actions		
Allowed with DOE WAP H&S Funds ☒		Allowed with Alternative Funds ☒
DOE funds may be used for limited (<\$1,000) remediation of conditions that may lead to or promote biological concerns and unsanitary conditions (e.g., repairing leaking sewage pipe).		
Required Testing/Inspection		
Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☒		Alternative Funds ☒
Sensory inspection of interior, exterior, attics, and subspaces of the dwelling.		
Prohibited Testing/Inspection		
Concur with DOE Guidance ☒		
DOE WAP H&S funds may not be used for testing of materials for biological contaminants.		

Required Occupant Education	
Concur with DOE Guidance ☒	Alternative Guidance ☐
Inform occupant in writing of observed biological and unsanitary conditions.	

6.4 – Building Structure and Roofing (e.g., roofing, wall, foundation)		
Allowable Actions		
Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☒	
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. All minor repairs must meet and follow the definition and requirement of incidental repairs.		
Prohibited Actions		
Concur with DOE Guidance ☒		
Using DOE WAP H&S funds for building rehabilitation.		
Define “major” repairs		
NA- H&S funds not allowed for major repairs.		
Required Testing/Inspection		
Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☒	Alternative Funds ☒	
Visual inspection of building structure and roofing for damages that compromise building durability and to verify that portions of the home where weatherization will occur are safe for entry and performance of assessments, work, and inspections.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☒	
If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.		
Prohibited Testing/Inspection		
Concur with DOE Guidance ☒		
Using DOE WAP H&S funds for any testing/evaluation of structural materials by a third-party is prohibited.		
Required Occupant Education		
Concur with DOE Guidance ☒	Alternative Guidance ☐	
Notify occupant in writing of structurally compromised areas.		

6.5 – Code Compliance	
Allowable Actions	
Allowed with DOE WAP H&S Funds ☒	Allowed with Alternative Funds ☒

- 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.

Common allowable code compliance situations:

- 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.
- 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.
- 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.
- Electrical code compliance work is allowed when required when installing new ventilation equipment.

Prohibited Actions

Concur with DOE Guidance ☒

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

Required Testing/Inspection

Concur with DOE Guidance ☒

Alternative Guidance ☐

Results in Deferral/Referral ☐

DOE WAP H&S Funds ☒

Alternative Funds ☒

Visual inspection.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds ☒

Allowed with Alternative Funds ☒

If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.

Required Occupant Education

Concur with DOE Guidance ☒

Alternative Guidance ☐

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

6.6 – Electrical

Required Actions

Concur with DOE Guidance ☐

Alternative Guidance ☒

Results in Deferral/Referral ☐

DOE WAP H&S Funds ☒

Alternative Funds ☒

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.

Allowable Actions		
Allowed with DOE WAP H&S Funds ☒	Allowed with Alternative Funds ☒	
Minor electrical repairs (e.g., junction box covers improper splices) to protect the occupant or workers from electrical hazards within the living area or in the immediate area where weatherization activities will occur.		
Prohibited Actions		
Concur with DOE Guidance ☒		
Using DOE WAP H&S funds for <i>major</i> electrical repairs as defined by the Grantee's H&S plan is prohibited		
Define "major" repairs		
Major electrical repairs are those over \$1,000.		
Required Testing/Inspection		
Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☒	Alternative Funds ☒	
- Visual inspection for presence and condition of knob-and-tube wiring. - Evaluate knob-and-tube wiring for safety prior to work. - Check for alterations that may create an electrical hazard.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☒	
Not applicable with DOE H&S funds		
Required Occupant Education		
Concur with DOE Guidance ☒	Alternative Guidance ☐	
- Provide occupant with written documentation of any electrical hazards identified that will not be addressed by weatherization - Provide information to occupant on over-current protection, overloading circuits, and basic electrical safety/risks if conditions warrant.		

6.7 – Fuel Leaks
Required Actions

Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☒	Alternative Funds ☒	
- When a gas leak is found on the utility side of service, the utility service must be contacted, work must be temporarily halted, and the leak must be repaired before work may proceed. - Fuel leaks that are the responsibility of the occupant (vs. the utility) must be repaired before installing weatherization measures in the home.		
Allowable Actions		
Allowed with DOE WAP H&S Funds ☒	Allowed with Alternative Funds ☒	
- 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. Fixing fuel leaks inside the home are allowable H&S expenses but may be assigned as a responsibility of the client. - Replacement or repair of leaking bulk fuel tanks and /or lines if connected systems will remain after weatherization. - Replacement of flexible appliance gas connectors that are not compliant with current fuel gas codes. Allowable but not required.		
Prohibited Actions		
Concur with DOE Guidance ☒		
- Using DOE WAP H&S funds to repair leaks that are the responsibility of the utility to correct is prohibited. - Using DOE WAP H&S funds for environmental cleanup resulting from bulk fuel leaks is prohibited		
Required Testing/Inspection		
Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☒	Alternative Funds ☒	
- Test all exposed gas lines, fittings, valves, and connections for fuel leaks from utility connection to the appliance throughout the home. - Test all gas appliances for fuel leaks at all connections, valves, fittings, and burners. - Conduct sensory inspection of all bulk fuels lines and storage tanks to determine if leaks exist.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☒	
No additional allowable activities.		
Prohibited Testing/Inspection		
Concur with DOE Guidance ☒		
Using DOE WAP H&S funds for environmental testing of soil or water is prohibited.		
Required Occupant Education		
Concur with DOE Guidance ☒	Alternative Guidance ☐	
Inform occupants in writing of fuel leak testing results, including specific location if fuel leaks are detected.		

6.8 – Gas Ovens/Stovetops/Ranges

Allowable Actions	
Allowed with DOE WAP H&S Funds ☒	Allowed with Alternative Funds ☐

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 and client will be informed of the importance of using exhaust ventilation when cooking and the importance of keeping burners and broilers clean to limit the production of CO.

Gas ranges will be visually inspected for operability and flame quality. 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.

Prohibited Actions

Concur with DOE Guidance ☒

Using DOE WAP H&S funds for replacement of gas ovens/ranges/stovetops is prohibited.

Required Testing/Inspection

Concur with DOE Guidance ☒

Alternative Guidance ☐

Results in Deferral/Referral ☐

DOE WAP H&S Funds ☒

Alternative Funds ☒

See above

Define action levels for oven CO testing and resulting actions

See above

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds ☒

Allowed with Alternative Funds ☒

See above

Required Occupant Education

Concur with DOE Guidance ☒

Alternative Guidance ☐

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

6.9 – Hazardous Materials

Required Actions

Concur with DOE Guidance ☒

Alternative Guidance ☐

Results in Deferral/Referral ☐

DOE WAP H&S Funds ☒

Alternative Funds ☒

- Hazardous Waste Materials generated by weatherization work (e.g., refrigerant, asbestos, lead, mercury, CFL lighting bulb/ballasts, etc.) must be disposed of according to all local and federal laws, regulations, and guidelines, as applicable. Costs specifically related to disposal may be charged as a H&S expense.
- Subgrantees must document disposal requirements in contract language with the responsible party.
- Limited** removal of pollutants that pose a risk to workers is required (e.g., flammable liquids, hazardous chemicals, and other air pollutants) as defined the Grantee's H&S Plan.
- If removal cannot be performed or is not allowed by the occupant, the unit must be deferred.

Define "limited" removal of pollutants

Limited removal is limited to \$1,000

Allowable Actions

Allowed with DOE WAP H&S Funds ☐

Allowed with Alternative Funds ☒

No additional allowable actions

Prohibited Actions

Concur with DOE Guidance ☒		
Using DOE WAP H&S funds for Lead, Asbestos, and Radon abatement is prohibited.		
Required Testing/Inspection		
Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☒	Alternative Funds ☒	
Sensory inspection.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☒	
No additional allowable testing		
Prohibited Testing/Inspection		
Concur with DOE Guidance ☒		
Using DOE WAP H&S funds for any testing for hazardous materials other than that specifically permitted in the asbestos, lead, and radon sections of this document is prohibited.		
Required Occupant Education		
Concur with DOE Guidance ☒	Alternative Guidance ☐	
• Inform occupant in writing of hazards associated with hazardous waste materials being generated/handled in the home. • Inform occupant in writing of observed hazardous condition and associated risks. • Provide occupant written materials on safety issues and proper disposal of household pollutants.		

6.10 - Injury Prevention of Occupants		
Allowable Actions		
Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☒	
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. 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.		
Prohibited Actions		
Concur with DOE Guidance ☒		
Using DOE WAP H&S funds for <i>major</i> repairs, as defined by the Grantee's H&S Plan is prohibited		
Define "major" repairs		
No H&S repairs allowed.		
Required Testing/Inspection		
Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☒	Alternative Funds ☒	
Visually inspect for dangers that would prevent weatherization.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☒	
No additional allowable inspection allowed		
Required Occupant Education		

Concur with DOE Guidance ☒	Alternative Guidance ☐
If identified hazardous conditions will not be corrected during weatherization, inform occupant in writing of observed hazards and associated risks utilizing the "Hazard Identification Notification Form" required by WPN 22-7.	

6.11 – Lead-Based Surface Coverings (Paint, Varnishes, Roofing, etc.)

Required Actions	
Concur with DOE Guidance ☐	Alternative Guidance ☒
DOE WAP H&S Funds ☒	Alternative Funds ☒
Weatherization 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 weatherization auditors, inspectors, field monitors, and agency 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. 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.	
Allowable Actions	
Allowed with DOE WAP H&S Funds ☒	Allowed with Alternative Funds ☒
See above	
Prohibited Actions	
Concur with DOE Guidance ☒	
- Using DOE WAP H&S funds for lead abatement is prohibited. - Using DOE WAP H&S funds for purchase, resourcing, or maintenance of X-ray Fluorescence (XRF) devices is prohibited.	
Allowable Testing/Inspection	
Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☒
See above.	
Required Occupant Education	
Concur with DOE Guidance ☐	Alternative Guidance ☒
Follow pre-renovation education requirements per KDHE RRP rules.	

6.12 – Mold and Moisture

Allowable Actions	
Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☒

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 weatherization 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.

Prohibited Actions

Concur with DOE Guidance ☒

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

Required Testing/Inspection

Concur with DOE Guidance ☒ Alternative Guidance ☐ Results in Deferral/Referral ☐

DOE WAP H&S Funds ☒ Alternative Funds ☒

Visual assessment for moisture or mold damage including exterior drainage.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds ☒ Allowed with Alternative Funds ☒

Allowable, but not required activities include diagnostics such as material moisture content, ore relative humidity measurements at the audit and/or final inspection.

Prohibited Testing/Inspection

Concur with DOE Guidance ☒

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

Required Occupant Education

Concur with DOE Guidance ☒ Alternative Guidance ☐

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

6.13 - Occupant Pre-existing or Potential Health Conditions

Required Actions

Concur with DOE Guidance ☒ Alternative Guidance ☐ Results in Deferral/Referral ☐

DOE WAP H&S Funds ☒ Alternative Funds ☒

- When a person's health may be at risk and/or WAP work activities could constitute an H&S hazard, the occupant is required to take appropriate action based on severity of risk. - Deferral, if occupant risk cannot be mitigated.		
Allowable Actions		
Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☒	
No additional allowable action with DOE H&S funds.		
Required Testing/Inspection		
Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☒	Alternative Funds ☒	
- Screen occupants for known or suspected health concerns either as part of initial application for weatherization, during the audit, or both. - This is done utilizing the "Occupant Pre-existing or Potential Health Condition Screening Form" required by WPN 22-7.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☒	
No additional allowable action with DOE H&S funds.		
Required Occupant Education		
Concur with DOE Guidance ☒	Alternative Guidance ☐	
- Inform occupant in writing of any known risks and provide pre-weatherization screening form. - Provide occupant with Subgrantee point of contact information in writing.		

6.14 – Pests		
Required Actions		
Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☒	Alternative Funds ☒	
Deferral of homes where infestation of pests cannot be reasonably removed or poses H&S concern for workers.		
Allowable Actions		
Allowed with DOE WAP H&S Funds ☒	Allowed with Alternative Funds ☐	
Limited pest removal is allowed only where infestation would prevent weatherization. Limited is defined as one or two treatments and recurring treatment plans are not allowed. Infestation of pests may be cause for deferral where it cannot be reasonably removed or poses health and safety concern for workers. 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. 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.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds ☒	Allowed with Alternative Funds ☐	
Visual assessment of presence and degree of infestation and risk to workers.		
Required Occupant Education		
Concur with DOE Guidance ☒	Alternative Guidance ☐	
Inform occupant in writing of observed conditions and associated risks.		

6.15 – Radon		
Required Actions		
Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☒	Alternative Funds ☒	

• Cover exposed dirt floors within the pressure/thermal boundary with a sealed soil gas retarder • Cover sump well/pits with airtight covers • Implement ventilation as required by ASHRAE 62.2-2016	
Allowable Actions	
Allowed with DOE WAP H&S Funds ☒	Allowed with Alternative Funds ☐
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 (e.g., no flooding), exposed dirt floors within the pressure/thermal boundary must be covered with an appropriately installed and sealed soil gas/vapor retarder (aka ground moisture barrier). Sump pump wells/pits must also be covered with airtight covers if within the pressure/thermal boundary. ASHRAE 62.2-2016 will also be applied, as required. Other precautions may include, but are not limited to, sealing any observed floor and/or foundation penetrations, isolating the basement from the conditioned space, or air sealing unconditioned cellars or crude basements to minimize connection with the living space.	
Prohibited Actions	
Concur with DOE Guidance ☒	
Using DOE WAP H&S funds for radon mitigation is prohibited.	
Allowable Testing/Inspection	
Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐
Radon testing is not allowed with DOE H&S funds.	
Required Occupant Education	
Concur with DOE Guidance ☒	Alternative Guidance ☐
• Provide all occupants EPA's A Citizen's Guide to Radon and inform them of radon related risks. • Occupants must sign an informed consent form prior to receiving weatherization services.	

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

Required Actions		
Concur with DOE Guidance ☐	Alternative Guidance ☒	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☒	Alternative Funds ☒	
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.		
Allowable Actions		
Allowed with DOE WAP H&S Funds ☒	Allowed with Alternative Funds ☐	
See above		
Prohibited Actions		
Concur with DOE Guidance ☒		
Using DOE WAP H&S funds for replacement of functional smoke or CO alarms that are not beyond the manufacturer's stated lifetime is prohibited.		
Required Testing/Inspection		
Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☒	Alternative Funds ☒	
Verify operation and age of installed alarms.		

Allowable Testing/Inspection	
Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐
No additional allowable testing.	
Required Occupant Education	
Concur with DOE Guidance ☒	Alternative Guidance ☐
Provide occupant with verbal and written information on use of newly installed devices and the potential risks of not properly maintaining these devices.	

6.17 – Ventilation and Indoor Air Quality		
Required Actions		
Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☐	Alternative Funds ☒	
Install ventilation as required by ASHRAE 62.2 - 2016. If occupant refuses ventilation as required by ASHRAE 62.2, the home must be deferred.		
Allowable Actions		
Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐	
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 H&S costs. 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 minimize 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.		
Required Testing/Inspection		
Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☒	Alternative Funds ☒	
- ASHRAE 62.2 evaluation to determine required post-weatherization ventilation. - Measure fan flow of existing fans and of installed equipment to verify performance.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐	
No additional actions		
Required Occupant Education		
Concur with DOE Guidance ☒	Alternative Guidance ☐	
- Provide occupant with information on function, use, and maintenance (including location of service switch and cleaning instructions) of ventilation system and components. - Provide occupant with equipment manuals for installed equipment. - Include disclaimer that ASHRAE 62.2 does not account for high polluting sources or guarantee indoor air quality.		

6.18 – Water Heaters	
<i>(see Combustion Appliances for combustion related requirements)</i>	
Allowable Actions	
Allowed with DOE WAP H&S Funds ☒	Allowed with Alternative Funds ☒

Water heating systems, i.e., water heaters, can be replaced using H&S funding if one of the following circumstances exists:

- Leaking AND would prohibit the installation of an approved measure or for the protection of a weatherization measure.
- Producing a high concentration of CO
- Installation of an on demand, direct vent, or fan assisted water heater is allowed if the required draft cannot be established after all other considerations. Fuel switching to an electric tank may also be considered but requires a field waiver from KHRC.

Required Testing/Inspection

Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☒	Alternative Funds ☒	

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

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds ☒	Allowed with Alternative Funds ☐
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Visual and combustion testing as required per KWAP mechanical inspection forms.

Required Occupant Education

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

6.19 – Worker Safety

Required Actions

Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☒	Alternative Funds ☒	

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

Allowable Actions

Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☒
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Costs for subrecipients to comply with general OSHA requirements may be charged to program support as tools and equipment.

Prohibited Actions

Concur with DOE Guidance ☒

Using DOE WAP H&S funds for *major* repairs as defined by the Grantee's H&S Plan is prohibited.

Define "major" repairs

Not applicable

Allowable Testing

Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐
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Not applicable

6.X – (Insert Additional H&S Items for Use of DOE WAP H&S funds)

Required Actions

Concur with DOE Guidance ☐	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☐	Alternative Funds ☐	

Insert required item text

Allowable Actions

Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐
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If DOE WAP H&S Funds are used for any “allowable” actions, detail them here.

Prohibited Actions

Concur with DOE Guidance ☐

What is prohibited

Required Testing/Inspection

Concur with DOE Guidance ☐	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☐	Alternative Funds ☐	

Insert required item text

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐
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If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.

Prohibited Testing/Inspection

Concur with DOE Guidance ☐

What is prohibited

Required Occupant Education

Concur with DOE Guidance ☐	Alternative Guidance ☐
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Insert required item text