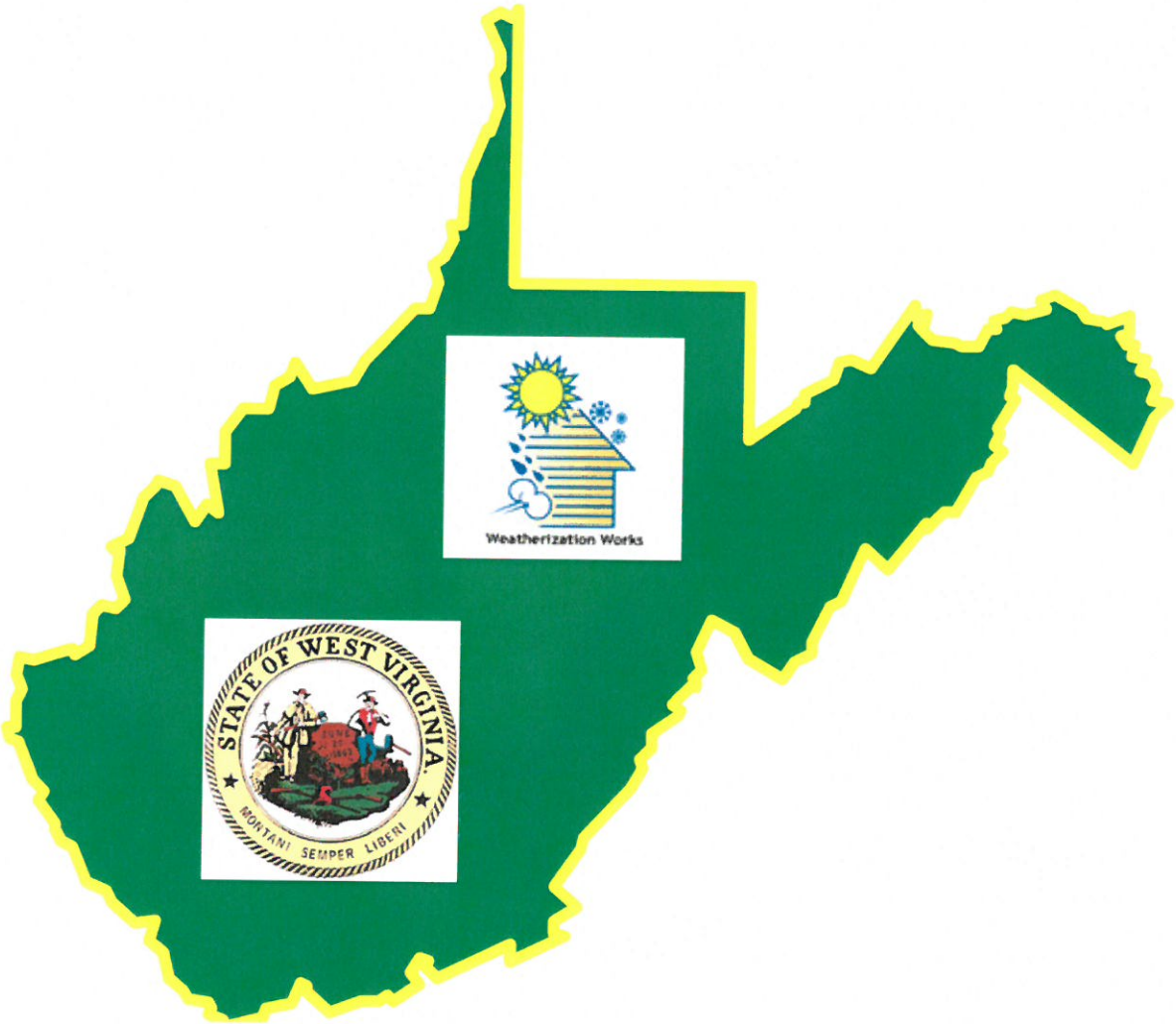
WEST VIRGINIA WEATHERIZATION ASSISTANCE PROGRAM



DOE STATE PLAN

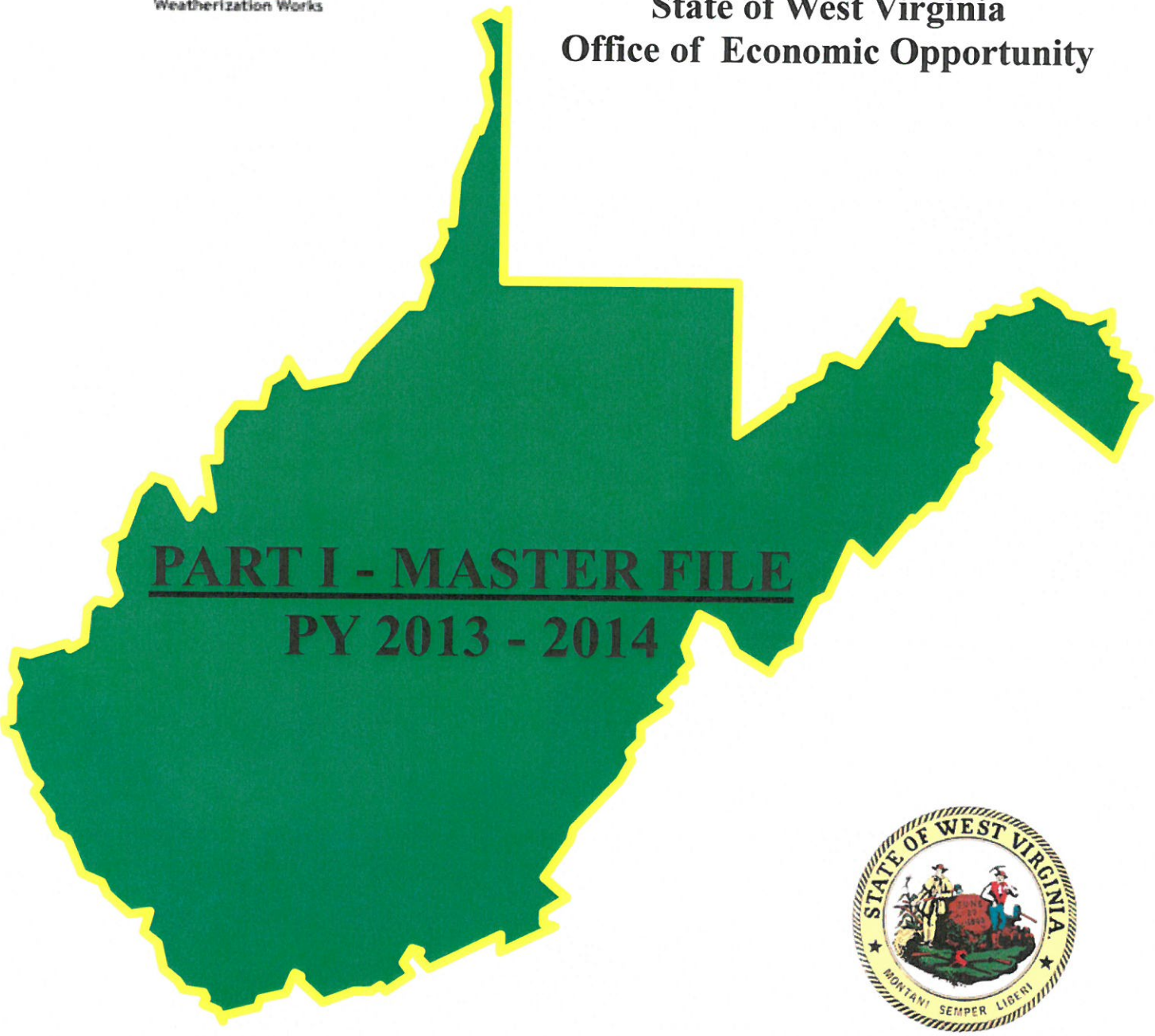
July 1, 2013 — June 30, 2014

State of West Virginia
Office of Economic Opportunity
700 Washington Street East, 4th Floor
Charleston, WV 25301
(304) 558-8860

Weatherization Works

West Virginia Weatherization Assistance Program

State of West Virginia
Office of Economic Opportunity



PART I - MASTER FILE
PY 2013 - 2014

State of West Virginia
Office of Economic Opportunity

U.S. Department of Energy
Program Year: 2013-2014
State Plan Master File

V. MASTER FILE

V.1. Eligibility

V.1.1 Approach to Determining Client Eligibility

Definition of Income Used to Determine Eligibility:

The West Virginia Weatherization Assistance Program (WV WAP) will determine eligibility of a dwelling unit based on the amount of household income and the conformity of that income to criteria established by the Low-Income Home Energy Assistance Act of 1981, 42 U.S.C. 8621. All Sub-grantees in the WV WAP will use 200% of the Office of Management and Budget (OMB) poverty guidelines for determining income eligibility. The WV WAP data management system calculates a twelve month income period needed to create an annualized income equivalent for comparison to the Poverty Income Guidelines. In addition, family units that have received cash assistance payments under Title IV or XVI of the Social Security Act, or applicable State or local law paid during the twelve-month period preceding application, will be eligible for weatherization pursuant to 10 CFR Part 440.22.

Eligibility Basis:

The WV WAP utilizes the US Department of Energy eligibility guidelines (200% poverty level) for the Weatherization Assistance Program. The WV WAP will mirror this eligibility basis for the WV Low Income Home Energy Assistance Program (LIHEAP), as stated in LIHEAP IM 1999-11 Optional Use of DOE Weatherization Rules for LIHEAP Funds Spent on Weatherization Activities.

Eligible Population Including Qualified Aliens:

The State of West Virginia Office of Economic Opportunity (OEO) has established an extensive intake/application process involving obtaining information from prospective program participants before a decision can be made on their eligibility for weatherization assistance. Each applicant must provide all of the items outlined as mandatory data fields in the application process/form. All prospective applicants will be required to identify and provide verification of the amount and source of all their income for their household. Additional data fields included

in the state data management system will require the collection and reporting of household demographic and residence specific information including but not limited to whether the applicant rents or owns his/her home. All applicants will be required to sign their application and certify to the validity of the information provided. Falsification of an application is subject to prosecution. The steps in the application/intake process detailed in this section ensure DOE weatherization services shall only be provided to eligible populations.

V.1.2 Approach to Determining Building Eligibility

Procedures to Determine That Units Weatherized Have Eligibility Documentation

Prior to any weatherization activity, a unit must be evaluated to determine whether previous weatherization services were provided after September 30, 1994. If services have been provided after this date with Department of Energy Federal funds, the unit is not eligible for additional weatherization services.

The following actions must be taken on each unit prior to weatherization services to ensure the homes that have received weatherization services after September 30, 1994 are not re-weatherized:

1. Each client's address must be entered into the data management system to identify whether the client's home has been weatherized during or after 2007 (length of WV WAP historical records with searchable addresses);
2. Each client's name must be entered into the data management system's Old Weatherization Data module, to check if the client has previously been reported as a completion during 1996 to 2007 (length of WV WAP historical records with client names only). If the client's name is found in the data management system as having had weatherization services, the agency will verify with the client if they are living at the same address as when they received weatherization services in the past. If the client verifies that this is the same address, then the dwelling is ineligible for weatherization services.
3. Each client must be asked whether their home has been weatherized after September 30, 1994; and
4. A visual inspection of each home must be performed by an auditor to identify whether previous weatherization measures have been performed. If the home was completed after September 15, 2011, Sub-grantees are required to place standardized tags provided by OEO on specified areas of dwellings after completing the weatherization process. This procedure is outlined in the policy WAP Weatherized Unit Tagging Procedure as Amended February 9, 2012.
5. If there are no documented, verbal, visual, or physical evidence of previous weatherization services, the Sub-grantee may proceed with weatherization services on the unit.
6. Sub-grantees may provide services to a dwelling unit previously weatherized prior to September 30, 1994, as noted in the American Reinvestment and Recovery Act of 2009 and WPN 13-1, section V.1.2. A "Reweatherized" unit falls

into the category of time indicated above and described under 20CFR 440.18(2)(iii). DOE gives Sub-grantees the flexibility to revisit those homes weatherized prior to September 30, 1994 that may not have received the full complement of weatherization services, including the use of an advanced energy audit or addressing health and safety concerns.

7. DOE-issued Weatherization Program Notice 12-7 Disaster Planning and Relief allows additional work to be done on homes due to natural disasters. In the event of a declared Federal or State disaster, weatherization crews may return to a unit reported as a completion to DOE that has been "damaged by fire, or act of God to be re-weatherized, without regard to date of weatherization". 10 CFR 440.18(f)(2)(ii).

Federal law requires every Weatherization Grantee and their Sub-grantees to comply with the National Historic Preservation Act (NHPA) and to maintain a Historic Preservation Review Section 106 Report Inventory as approved by the WV State Historic Preservation Office (SHPO), for all structures weatherized 45 years or older, addressing all historic preservation requirements.

The WV WAP will provide weatherization to rental units including multiple dwelling units. No rented dwelling unit can be weatherized without first obtaining the written permission of the owner of the dwelling unit or agent. If an eligible client lives in a rental unit, completion of the "Owner Agreement of Rental Homes" form will be mandatory, signed by the owner of the dwelling giving permission for the weatherization crew to provide weatherization measures to the building.

Multiple dwelling units are defined as buildings containing 5 units or more can be weatherized if 66% (50% for duplexes and quadraplexes) of the occupants qualify for weatherization assistance pursuant to Federal Regulation 440.22.

The WV WAP developed and implemented a "Deferral Policy" on August 21, 2012 to assist in the decision to defer weatherization assistance on an eligible dwelling in attempts to standardize the procedure throughout West Virginia. As per the policy, a deferral does not mean that weatherization assistance will never be available, but that work must be proposed until the problems at the home can be resolved.

After an on-site visit has been conducted, if conditions warrant, and the Sub-grantee determines that the home meets one or more of the deferral conditions, as outlined in the policy, a letter must be sent to the client outlining the conditions present at the dwelling and the justification for deferral.

The WV WAP Sub-grantees are to be diligent in their following of the extensive in-take/application process outlined in the *Eligible Population Including Qualified Aliens* section. The eligibility documentation is maintained in the database management system and may be supplemented with a physical client file. All eligibility documentation in physical client files and/or eligibility documentation entered in the database management system is to be

reviewed for compliance by the Sub-grantee prior to weatherization services being provided. In the event that six (6) months or more has lapsed between the date of application and the date weatherization services is scheduled to begin on a particular job, the income of that client must be re-verified as per WV WAP requirements. OEO provides a secondary review of eligibility documentation and process selecting a sample of weatherization dwellings during the monitoring process.

Reweatherization Compliance

Prior to any weatherization activity, a unit must be evaluated to determine whether previous weatherization services were provided after ***September 30, 1994***. If services have been provided *after this date* with Department of Energy federal funds, the unit is not eligible for additional weatherization services.

The following actions must be taken on each unit prior to weatherization services to ensure the homes that have received weatherization services after September 30, 1994 are not re-weatherized:

1. Each client's address must be entered into the data management system to identify whether the client's home has been weatherized during or after 2007 (length of WV WAP historical records with searchable addresses);
2. Each client's name must be entered into the data management system's Old Weatherization Data module, to check if the client has previously been reported as a completion during 1996 to 2007 (length of WV WAP historical records with client names only). If the client's name is found in the data management system as having had weatherization services, the agency will verify with the client if they are living at the same address as when they received weatherization services in the past. If the client verifies that this is the same address, then the dwelling is ineligible for weatherization services.
3. Each client must be asked whether their home has been weatherized after September 30, 1994; and
4. A visual inspection of each home must be performed by an auditor to identify whether previous weatherization measures have been performed. If the home was completed after September 15, 2011, Sub-grantees are required to place standardized tags provided by OEO on specified areas of dwellings after completing the Weatherization process. This procedure is outlined in the policy *WAP Weatherized Unit Tagging Procedure as Amended February 9, 2012*.
5. If there are no documented, verbal, visual, or physical evidence of previous weatherization services, the Sub-grantee may proceed with weatherization services on the unit.
6. Sub-grantees may provide services to a dwelling unit previously weatherized ***prior to September 30, 1994***, as noted in the American Reinvestment and Recovery Act of 2009 and WPN 13-1, section V.1.2. A "Reweatherized" unit falls into the category of time indicated above and described under 20CFR 440.18(e)(2)(iii). DOE gives Sub-grantees the flexibility to revisit those homes weatherized prior to September 30, 1994 that may

not have received the full complement of Weatherization services, including the use of an advanced energy audit or addressing health and safety concerns.

7. DOE-issued *Weatherization Program Notice 12-7 Disaster Planning and Relief* allows additional work to be done on homes due to natural disasters. In the event of a declared Federal or State disaster, allowable expenditures under WAP include:

    - The cost of incidental repairs to an eligible dwelling unit if such repairs are necessary to make the installation of weatherization materials effective.
    - The cost of eliminating health and safety hazards, elimination of which is necessary before the installation of weatherization materials (10 CFR 440.18(d)(9); 10 CFR 440.18(d)(15).
    - To the extent that the services are in support of eligible weatherization (or permissible re-weatherization) work, such expenditure would be allowable.

    In the event of a declared Federal or State disaster, weatherization crews may return to a unit reported as a completion to DOE that has been "damaged by fire, or act of God to be re-weatherized, without regard to date of weatherization", 10 CFR 440.18(f)(2)(ii). Local authorities must deem the dwelling unit(s) salvageable as well as habitable and if the damage to the materials is not covered by insurance or other form of compensation.

    - Debris removal from a dwelling unit that is not to be weatherized would not be an allowable cost.
    - 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 by WAP is reimbursed according to the DOE Financial Assistance Regulations 10 CFR Part 600.

    WAP rules require that priority be given to identifying and providing weatherization assistance to elderly persons, persons with disabilities, families with children, high residential energy users, and households with high energy burdens (10 CFR 440.16(b)). However, it would be permissible to consider in households located in the disaster area, as a priority as long as the households are eligible and 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.

OEO developed and implemented a "Weatherized Unit Tagging Procedure" policy on September 15, 2011 (amended on February 9, 2012) to maintain compliance with DOE's "Reweatherization" Policy. WV WAP's "Weatherized Unit Tagging Procedure" requires the placement of a permanent, standardized, tag on each completed dwelling unit including the following information:

a. Sub-grantee Name

b. WV Weatherization Assistance Program

c. Sequential Number

d. "DO NOT REMOVE" indication

e. Initials of Sub-grantee Quality Control Inspector and date of Quality Control Inspection (indicated in permanent marker)

There are specific locations in the dwelling outlined in the policy where the Sub-grantees are to attach the tags in an effort to make them as permanent as possible. The Sub-grantee is to attach two tags in different locations to each home in the case that one would become detached. The Sub-grantee must also maintain a picture of the tag and its location in the dwelling unit in the physical client file or as a Portable Document Format (PDF) in the data management system. Failure to adhere to the policy could result in the dwelling unit not being deemed as a "Completion" and in turn all associated costs could be disallowed. This policy allows all weatherized dwellings to be identified as such in the field and/or in the data management system to maintain DOE "Reweatherization" Policy compliance. The procedure implemented also maintains sufficient accountability of the Sub-grantee (and specific Quality Control Inspector) providing the weatherization services on a particular dwelling.

For information on Disaster Planning and Relief, refer to *Section V.9 – Energy Crisis and Disaster Response Plan.*

Structures Eligible for Weatherization

Sub-grantees shall ensure that weatherization services are being provided to low-income persons that live in standard types of housing (i.e. single family, rentals, manufactured housing, and multi-family buildings). Sub-grantees will exercise caution when approaching non-traditional type dwelling units including but not limited to shelters and apartments over businesses. For procedures regarding structures that require deferral of services due to the structure being deemed at least temporarily ineligible, refer to the *Deferral Process Section.*

Rental Units/Multifamily Buildings

The WV WAP will provide weatherization to rental units including multiple dwelling units. Multiple dwelling units are defined as buildings containing 5 units or more can be weatherized if 66% (50% for duplexes and quadraplexes) of the occupants qualify for weatherization assistance pursuant to Federal Regulation 440.22; however, no rented dwelling unit can be weatherized without first obtaining the written permission of the owner of the dwelling unit or agent. Completion of the "Owner Agreement of Rental Homes" form will be mandatory for rental units.

The "Owner Agreement of Rental Homes" form is designed to assure the following:

1. That the benefits of weatherization assistance shall reside primarily with the low income tenants;

2. That rent shall not be raised because of the increased value of dwelling unit(s) due solely to weatherization assistance provided under this program;

3. That no undue or excessive enhancement shall occur to the value of the dwelling unit; and

4. That the landlord understands the requirements set forth by the "Financial Participation Policy for Rental Units" that requires a landlord with income outside of the poverty guidelines of the WV WAP program contributes a percentage of the costs of the various weatherization measures.

In the event that all possible negotiations with the landlord have been attempted yet the landlord refuses contribution, the dwelling may still be weatherized with proper documentation and approval from the OEO.

All Multifamily units will follow the established client prioritization protocols as established in single-family weatherization, unless otherwise determined by the OEO. Weatherization services provided to multifamily dwelling units will also be supported by OEO "Multiple Dwelling Unit Policy and Guidance" implemented in February 25, 2011 detailing the process, procedures, and requirements in detail.

Deferral Process

The WV WAP developed and implemented a "Deferral Policy" on August 21, 2012 to assist in the decision to defer weatherization assistance on an eligible dwelling in attempts to standardize the procedure throughout West Virginia. As per the policy, a deferral does not mean that weatherization assistance will never be available, but that work must be proposed until the problems at the home can be resolved. Sub-grantee crews and contractors are expected to pursue all reasonable options on behalf of the client, within program guidelines. After an on-site visit has been conducted, if conditions warrant, and the Sub-grantee determines that the home meets one or more of the following deferral conditions, a letter must be sent to the client outlining the conditions present at the dwelling and the justification for deferral.

Possible deferral conditions include but may not be limited to the following:

a. Structurally unsound dwelling that is not suitable and adaptable to Weatherization, and Weatherization Program does not have the resources to do necessary repairs.

b. Electrical or plumbing hazards that cannot be resolved prior to or as part of Weatherization services.

c. The presence of raw sewage around or in any part of the dwelling.

d. The presence of a dead animal, or animal feces, in an area where program staff must install weatherization measures.

e. Excessive debris and clutter around the dwelling that limits access to the dwelling.

f. Pets unchained or running loose that would be distracting or unsafe to program staff.

g. The client is uncooperative, abusive, or threatening to the crew, or there is an apparent threat of violence or abuse to any program worker, or any household member, during the weatherization process.

h. The presence or use of any controlled substance in the dwelling during the Weatherization process.

i. Environmental hazards, such as serious moisture problem, known excessive radon, friable asbestos, excessive lead paint, or other environmental hazards that cannot be resolved prior to or as part of the Weatherization services.

j. Evidence of substantial infestation of rodents, insects, bats, or other harmful/objectionable animals that are difficult to control.

k. Major remodeling is in progress, limiting the proper installation of weatherization measures.

l. Substantial standing water in or around the crawl space or basement area limiting the proper completion of Weatherization measures.

m. Dwelling resident has a medical condition that prohibits the installation if insulation and/or other weatherization measures.

n. No cost-effective or appropriate health and safety measures can be done to the house resulting in minimal energy savings.

o. Customer in arrears with utility vendor, gas service has been shut off, or electric service has been shut off.

p. Client refusal of primary energy conservation measure (SIR $\geq$ 2).

q. Client refusal of Health & Safety measure necessary for client safety.

r. Income verification needed.

s. Updated utility information needed.

t. Other conditions not listed above that prohibit complete weatherization.

There are several steps detailed in the WV WAP "Deferral Policy" outlining the Sub-grantee and/or client's responsibilities after the aforementioned deferral letter is generated in order to possibly complete weatherization for a client that was originally deferred. These steps involve allowing the client to correct the identified issues or barriers to weatherization and provide the Sub-grantee with documentation that issues have been addressed. There is also a procedure in place in the event that issues are not addressed or no response is received from the client. All applicable steps must be followed and all required documentation retained.

V.1.3 Definition of Children

In terms of prioritizing households including children, the State of West Virginia has defined "children" as those 18 years old and under.

V.1.4 Approach to Tribal Organizations

In accordance with federal rule, the State of West Virginia recommend that tribal organizations not be treated as local applicants eligible to submit an application to operate a Weatherization Assistance Program. In accordance with 10 CFR 440.16(f), low-income Native Americans will receive benefits equivalent to assistance provided to other low-income persons within the state as eligible individual applicants under program guidelines.

V.2 Selection of Areas to be Served

The method used to select each area to be served by a weatherization project will be as follows:

1. All 55 counties in West Virginia will be served by the WV WAP.

2. Selection of weatherization Sub-grantees or qualified entities is made pursuant to 10 CFR 440.15.

3. Sub-grantee's in the state operate the Weatherization Assistance Program in service areas designated by specific counties, barring any unforeseen circumstances in which this service area would need to be altered. Sub-grantees may contract with one another in efforts to more efficiently and effectively provide weatherization services to all counties within a Sub-grantee's service area.

4. In the event that OEO determines that a Sub-grantee fails to meet WV WAP grant agreement requirements, options include (but are not limited to) allocating the funds to other eligible Sub-grantees or qualified entities in the state.

V.3 Priorities for Service Delivery

The WV WAP will give priority to identifying and providing weatherization assistance to elderly persons (60 years of age or older), persons with disabilities, and households with children (18 years of age or younger). Priority can also be given to households with a high energy burden defined by the WV WAP as 20 percent or more of the household income is utilized to pay for energy usage. Another factor considered when prioritizing clients is the time spent on the wait list.

The State is also exploring means of identifying and targeting high energy users (i.e. energy usage is above average as a result of household composition and/or unusual needs for energy) as a priority group, in collaboration with WV WAP utility partners.

The State has developed a point system to rank clients using the aforementioned prioritization criteria in the data management system that tracks all clients, dwellings and weatherization work. The WV WAP Sub-grantees must adhere to this prioritization list and point system within the data management system unless otherwise directed or approved by OEO.

The OEO may modify the prioritization system throughout the program year within the parameters of the program. The intent will be to conserve the maximum amount of energy possible while serving the needs of each community. Sub-grantees do not have the ability to manipulate or alter the prioritization system or criteria without written approval from the OEO.

Sub-grantees shall ensure that weatherization services are being provided to low-income persons that live in standard types of housing (i.e. single family, rentals, manufactured housing, and multi-family buildings). Housing type is not a recognized priority.

V.4 Climatic Conditions

West Virginia climatic data is compiled from the record the National Oceanic & Atmospheric Administration (NOAA) from weather data collected from 103 sites in West Virginia.

The 1971 – 2000 Climatography of the United States No. 81, Monthly Heating and Cooling Degree Days reports the following averages from 80 stations around the state of West Virginia:

Cooling Degree-days (CDD)	656.7
Heating Degree-days (HDD)	5635.2

The National Oceanic and Atmospheric Administration's account of climatic conditions indicated the national medians were 5,429.9 heating degree-days and 867.3 cooling degree-days. Based on the cooling degree-days, the state has not approved specific cooling measures under health and safety. However, the WV WAP may pursue funds outside of standard federal weatherization funds to address cooling measures that compliment and supplement WV WAP.

V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials

The West Virginia Weatherization Field Standards (2009) outline procedures for common weatherization measures, and establishes standards for installation. The West Virginia Weatherization Field Guide (2009) is an in-field instructional reference guide for program supervisors and technicians. Together, the Field Standards and Field Guide create a logical and practical means of addressing the energy conservation needs of the state's dwelling units.

The West Virginia Finance and Administrative Guide (2005) outlines procedures and requirements for overall WV WAP program management.

OEO develops and distributes West Virginia Weatherization Program Notices (WV WPN) and West Virginia Weatherization Bulletins (WV WXBulletin) to provide additional guidance on specific requirements and major program updates and/or changes. These notices are in supplement to DOE Weatherization Program Notices.

All work is being performed in accordance to the DOE approved energy audit procedures and 10 CFR 440 Appendix A.

OEO is working on updating the new requirements of Standard Work Specifications (SWS) for both the West Virginia Weatherization Field Standards and Field Guide. OEO has also started the update process for the West Virginia Finance and Administrative Guide.

V.5.2 Energy Audit Procedures

Unit Types	Audit Procedures and Dates Most Recently Approved by DOE
Single-Family	NEAT, 2011
Multi-Family	NEAT, 2011 - In Multi-family weatherization, until the Weatherization Assistant MDU module is fully developed and implemented, WV WAP will

	continue to utilize a previously approved Priority List (2011) which only applies to dwellings that are 1-5 units that are individually heated or cooled; garden style apartments that are 3 stories or less. Buildings that do not meet this criterion must use the NEAT audit to determine appropriate, cost effective weatherization services. A minimum 25% audit sampling must be completed on apartments with different configurations and heat loss characteristics for each building to be weatherized.
Mobile Home	MHEA, 2011

WV WAP uses the Weatherization Assistant software as its energy audit tool. The Weatherization Assistant energy audit software was developed by Oak Ridge National Laboratory specifically for the use for the Weatherization Assistance Program. There are two components to the Weatherization Assistant software: the National Energy Audit Tool (NEAT) for single family houses and the Manufactured Home Energy Audit (MHEA) for mobile homes.

NEAT and MHEA should also be used to analyze refrigerator replacements and to perform heating system replacement sizing calculations. Each Sub-grantee must have at a minimum one certified energy auditor with a good working knowledge of NEAT and MHEA or an approved contract in effect with another Sub-grantee to perform energy audits.

V.5.3 Final Inspection

Sub-grantee Quality Control Inspectors (QCI) are required to perform a final inspection of each dwelling unit before it can be reported as a completion. The final inspection must be performed by the certified QCI using the WV WAP mandated "QCI/Quality Assurance" form and certify that the work has been completed in a professional manner and is in accordance with the priority determined by the audit procedures required by 10 CFR 440.21. Unless authorized by the OEO, the QCI will not have worked on the dwelling unit being inspected.

As of September 15, 2011, OEO implemented a "QCI/Quality Assurance" form and associated policy. The standardized form was based off of DOE's example of a quality assurance document, modified to meet the needs of the WV WAP. The form and the associated policy provide uniform guidelines and practices for final inspections of units at the Sub-grantee level, to ensure such are performed correctly and thoroughly prior to being submitted as a completed unit.

V.6 Weatherization Analysis of Effectiveness

Program production, goal attainment, and expenditure rates are tracked on a monthly basis for each Sub-grantee at the State level on a statistical analysis tool. These statistics are analyzed periodically, and the appropriate technical assistance is provided to those agencies not meeting goals or benchmarks. The Sub-grantees use the same statistical analysis tool for tracking their

own production and expenditures to further ensure routine evaluation of local programs and reevaluation of goals when necessary. OEO will also establish production and expenditure benchmarks that will be included in the Sub-grantee Grant Agreements to increase accountability and ensure proper program management.

The WV WAP utilizes the database management system to track all weatherization work performed on any dwelling. The database management system coupled with the aforementioned statistical analysis tool will facilitate a review/analysis process essential for program management and oversight. The review process will serve as a routine procedure to ensure compliance, as well as an initial monitoring process to confirm that measures are performed and tracked according to program standards, and that diagnostic and health and safety tests are performed and documented correctly. This process allows for the identification of trends that may convey a training or technical assistance need, or specific jobs that may need to be monitored due to documentation of measures.

As mentioned in the State Plan Annual File, the state is developing a system to track and compare projected energy savings with actual energy savings as per 440.14(c)(4). The process will entail utilizing data from the "Weatherization Assistant Recommended Measures Output Report" coupled with data analysis on energy savings for specific measures provided by a utility company. After a comparison of energy savings projections and actual energy savings data across the state, the WV WAP can then compare productivity and associated energy savings data from the individual Sub-grantees.

As stated in section *V.8.3 Monitoring Activities*, OEO also tracks the most significant deficiencies of Sub-grantees (findings and trends for concern) in a "Root Cause Analysis" spreadsheet to evaluate and analyze trends of the Sub-grantees' performance over a period of several years. This analysis is another contributing factor to the identification of training and technical assistance activities and priorities. The collection and analysis of the data keeps OEO on a path of continuous improvement with regards to support, guidance, and oversight which in turn will keep the Sub-grantees on the same path regarding the weatherization services provided and management of the program.

V.7 Health And Safety

Introduction

The primary goal for the WV WAP is to implement cost-effective weatherization procedures to conserve energy and to assess and correct related health and safety hazards for the well-being of clients, their dwellings, and weatherization personnel.

With more advanced diagnostics and installation techniques utilized in the WV WAP, it is increasingly necessary to take steps to ensure that program measures do not cause or exacerbate health and safety problems for workers or clients.

Each home weatherized must be individually assessed to determine the existence of potential hazards to weatherization personnel or clients. When conditions within the home are such that the health and safety of the client, crew, or subcontractor will be jeopardized prior to providing assistance, weatherization must not proceed until such problems are remedied. In some cases, mitigation of problems may be beyond the scope of the weatherization program. In these instances, the client must be notified in writing and referred to alternative resources for resolution of the problem.

In those instances where the existing conditions are perceived to pose a threat to the crew or contractor's health and safety, the WV WAP allows for deferral of weatherization work until the identified condition is made acceptable.

Budgeting

The WV WAP will budget Health and Safety in a separate category and thereby exclude such costs from the average unit cost calculations. This separate category will also allow these costs to be isolated from energy efficiency costs in program evaluation.

Incidental Repairs

Incidental Repairs means those repairs necessary for the effective performance or preservation of weatherization materials. Such repairs include, but are not limited to, minor roof repair, framing or repairing windows and doors which could not otherwise be caulked or weather-stripped, and providing protective materials, such as paint, used to seal materials installed under this program. Incidental repairs will be capped at $500 on a per job basis. The WV WAP has developed a spreadsheet identifying allowable measures to be installed under health and safety and allowable measures to be installed as incidental repairs.

Health and Safety Expenditure Limits

For the 2013 – 2014 Program Year, West Virginia would request to utilize up to 17% of our 2013 award for Health and Safety Expenditures. The estimation process that was followed to reach the percentage was based on "Health and Safety Training for Programmatic Staff" provided by DOE via the Weatherization Assistance Program Technical Assistance Center (WAPTAC) site. OEO reviewed the health and safety measures performed during the previous Program Year. The measures were grouped into 5 major Health and Safety Measure Categories. OEO reviewed the previous Program Year's health and safety expenditure data and calculated the average cost for those measures as well as the frequency the measures were performed. The average costs were multiplied by the frequencies to get a total, and the totals were summed to calculate an average health and safety cost per job. This amount was multiplied by the projected number of DOE completions and divided by the Program Operations amount to calculate the Health and Safety percentage. The chart below displays the process:

Allowed Measure	Average Cost	Frequency	Total
Mold & Moisture	$153	85%	$130
Venting	$545	65%	$354
Furnace Repair/Replace	$1,383	25%	$345
Lead Safe	$160	5%	$8
CO/Smoke Detectors	$136	100%	$136
Total	$2,377		$973

Based on the analysis presented above, the maximum health and safety expenditures for any one home should not exceed $2,377 (unless approved by OEO due to extenuating circumstances) with $973 as the average amount spent per home on health and safety. Any home that is estimated through the WV WAP audit process to need more than $1,675 in health and safety expenditures must have OEO approval prior to the work being completed, or the job will not be allowable to be turned in as a completion for reimbursement.

These costs are recorded in the data management system and tracked separately at the Sub-grantee level for accounting purposes, as well as on the Residential Audit Form and reported as a separate line item on the Monthly Progress Report. A list of materials that are allowable charges to Health and Safety has been developed. Sub-grantees cannot add additional materials to this list. In this way, OEO can monitor the Health and Safety cost on each job. Each month, the H&S costs are reported to OEO on the Sub-grantee Monthly Progress Report. These costs are reviewed monthly and OEO works with the Sub-grantee to bring them into compliance.

OEO is pursuing using utility funds to cover some of the Health and Safety costs, to lessen the burden on the DOE funds. However, at this time, most of the utility partnerships do not allow for Health and Safety costs in their programs.

Procedure for Indentifying Occupant Health Concerns

- When a person's health may be at risk and/or the work activities could constitute a health and safety hazard, the occupant at risk will be required to take appropriate action based on the severity of the risk.
- The at-risk occupant should reveal they have known or suspected health concerns during the initial application for weatherization services.

- The at-risk occupant should be provided with known risks of the weatherization process.
- Sub-grantee contact information should be provided to the occupant so that occupant can easily provide information about health issues or concerns.
- Failure or the inability to take appropriate actions must result in deferral of the weatherization work.

Documentation for identifying occupant health concerns will include:

- Client's name and address
- Dates of the audit/assessment and when the client was informed of a potential health and safety issue
- Clear description of the problem
- Statement indicating if, or when weatherization could continue
- Client(s) signature(s) indicating that they understand and have been informed of their rights and options.

Healthy Homes/Weatherization Plus Health

The WV WAP anticipates the incorporation of elements of the Healthy Homes and Weatherization Plus Health initiatives to help West Virginia's most vulnerable families and make their homes energy efficient, safe, and healthy. The WV WAP aims to develop a comprehensive, holistic approach coupled with Weatherization to help combat disease and injury in the home linking substandard housing and poor health. This method will allow the WV WAP to possibly address a wide array of health and safety issues, including lead poisoning, asthma (exacerbated by moisture, mold, and pests), exposure to radon and other toxic chemicals, and injury caused by old or dilapidated housing, among a myriad of others. The WV WAP plans to fund these efforts utilizing all available funding streams, collaborating with both federal and nonfederal partners. It is a goal of OEO to develop Healthy Homes guidance and policy for the WV WAP Sub-grantees to provide detailed information regarding proper practices, allowable measures, documentation, and the appropriate funding sources to utilize.

Potential Hazard Considerations

1. ***Biological and Unsanitary Conditions***

   The detection and remediation of mold, odors, viruses, bacteria, unsanitary conditions, and rotting wood is often beyond the scope of the Weatherization Assistance Program, and may be a reason for deferral. Since workers often encounter these conditions, they try to remedy the situation if possible and take precaution to not exacerbate any potential problem. Factors such as cleaning agents, paints and turpentine, gasoline, sewage, animal waste, and excessive dust can sometimes be addressed to allow weatherization work to occur. Auditors will inform the client of observed conditions.

- **Mold and Moisture** - The Weatherization Assistance Program is not a mold remediation program. The use of DOE funds for the removal of mold and other related biological substances is not an allowable weatherization expense. Mold testing is not an allowable cost. If necessary, Weatherization Assistance Program services may need to be deferred until the existing mold problem can be corrected or referred to another program for funding of remedial action.

All homes will be inspected for previous and existing moisture problems using the OEO Mold Procedure/Checklist Form to document existing mold and moisture related problems in homes. Moisture, mold, and mildew can seriously affect the health and safety of the client and crew. Steps must be taken to alleviate moisture problems. The WV WAP will ensure that regular weatherization work is performed in a manner that doesn't contribute to the increase of any mold problems, and when the work is performed properly, can alleviate many mold conditions.

- **Drainage -** Auditors will conduct a visual inspection. Major drainage issues are beyond the scope of the Weatherization Assistance Program. Homes with conditions that may create a serious health concern that require more than incidental repair should be deferred.

2. ***Combustion Appliances and Combustion Gases*** - Proper venting to the outside for combustion appliances, including gas dryers is required. Correction of venting is allowed when testing indicates a problem.

   Sub-grantees will conduct combustion safety testing and is required when combustion appliances are present.

   Sub-grantees will conduct inspection of venting of combustion appliances and confirm adequate clearances and test naturally drafting appliances for draft and spillage under worst case conditions before and after air tightening and inspect cooking burners for operability and flame quality.

   Sub-grantees will provide the client with combustion safety and hazards information, including the importance of using exhaust ventilation when cooking and the importance of keeping burners clean to limit the production of Carbon Monoxide (CO).

   - **Air Conditioning and Heating Systems -** Air conditioning system replacement, repair, or installation is not an allowed health and safety cost. Replacement or repair must be justified as an energy conservation measure.

   Heating system repair, replacement, or installation is allowed of red-tagged, inoperable, or nonexistent heating systems where climate conditions warrant. Repair and replacement of inoperable or unsafe combustion appliances is allowed, including the installation of direct

vent-sealed combustion appliances. Repair and cleaning must be considered before replacement. Correction of venting is allowed when testing indicates a problem.

- **Appliances and Water Heaters -** Poorly functioning water heaters that may pose a health concern may be replaced on a case-by-case basis. Installation of one water heater per dwelling is allowed. Documentation must be maintained to justify replacement of water heaters. Replacement and installation of other appliances for health and safety reasons is not allowed. Repair and cleaning for other appliances is allowed.

- **Smoke, Carbon Monoxide Detectors, and Fire Extinguishers -** If smoke alarms are inoperable or non-existent, at least one alarm must be installed in each weatherized dwelling on each floor. Follow the manufacturer's recommendations for locating and installing the alarm(s). Typically, alarms are installed where the clients spend the most time, such as near bedrooms. If an entire multi-family building is to receive weatherization services, a CO alarm should be installed in each unit of the complex. If existing hard-wired smoke alarms are inoperable or broken, they must be replaced with comparable units. Replacement of operative smoke alarms is not an allowable expense.

Providing fire extinguishers is allowable only when solid fuel is present. Sub- grantees will provide the client with verbal and written information on use of smoke/CO detectors and fire extinguishers where allowed.

3. *Other Heating Sources*

- **Solid Fuel Heating -** Maintenance, repair, and replacement of primary indoor heating units is allowed where occupant health and safety is a concern. Maintenance and repair of secondary heating units is allowed.

  The WV WAP utilizes a "Solid Fuel Appliance Checklist" which addresses safety issues, including fire hazards, from wood and coal stoves. Issues relating to the stove, stove pipe, and chimney are also addressed. The auditor is required to inspect the chimney and flue and combustion appliance zone depressurization.

- **Space Heaters, Stand Alone Electric -** Repair, replacement, or installation of stand-alone electric space heaters is not allowed. Adhere to the following procedures:

  1. Check the electrical circuitry to ensure adequate power for existing space heaters.

2. Inform client of the hazards of use and have client sign a waiver if removal is not allowed by the client.
3. Removal is recommended. Stand-alone electric space heaters may be used as a temporary heat source during weatherization if the primary heating system is disabled.

- **Space Heaters, Unvented Combustion -** Removal is required, except as a secondary heat where the unit conforms to ANSI Z21.11.2. Units that do not meet ANSI Z21.11.2 must be removed prior to weatherization but may remain until a replacement heating system is in place. Testing for air-free carbon monoxide (CO) is allowed. Units must be checked for the ANSI Z21.11.2 label. Clients will be informed of the dangers of unvented space heaters. CO, moisture, and Nitrogen Dioxide (NO2) can be dangerous even if the CO alarm does not sound.

- **Space Heaters, Vented Combustion -** Vented space heaters will be treated as furnaces. Venting will be tested consistent with furnaces. Proper testing methods for safe operation (draft and CO) will be conducted and for steady state efficiency if possible.

4. ***Fire Hazards*** - Correction of fire hazards is allowed when necessary to safely perform weatherization. The auditor will visually inspect the dwelling during the audit and crews will inspect while performing weatherization.

5. ***Occupant Pre-existing or Potential Health Conditions*** - The WV WAP and Sub-grantees are required to take all reasonable precautions against performing work on dwellings that will subject clients to health and safety risks. Before beginning work on the dwelling, the agency 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. When a person's health is fragile and/or the work activities would constitute a health or safety hazard, the occupants at risk will be required to leave the home during these work activities.

   When a person's health may be at risk and/or the work activities could constitute a health or safety hazard, the occupant at risk will be required to take appropriate action as previously identified, based on severity of risk. Temporary relocation of at-risk occupants may be allowed on a case by case basis. Failure or the inability to take appropriate actions must result in deferral.

6. ***Indoor Air Quality***

a. Asbestos – General asbestos removal is not approved as a health and safety weatherization cost. Major asbestos problems will be referred to the appropriate state agency and/or Environmental Protection Agency (EPA).

- **In siding, walls, ceilings, etc. -** Removal of siding is allowed to perform energy conservation measures. All precautions must be taken not to damage siding. Asbestos siding should never be cut or drilled. It is recommended where possible to insulate through home interior. The client will be informed that suspected asbestos siding is present and how precautions will be taken.

- **In vermiculite -** When vermiculite insulation is found in an attic, unless testing proves otherwise, take precautionary measures as if the vermiculite contains asbestos. Encapsulation by an appropriately trained asbestos control professional is allowed. Removal is not permitted. Blower door testing should be done with pressurization rather than depressurization.

  Assess whether vermiculite is present. Asbestos Hazard Emergency Response Act of 1986 (AHERA) certified prescriptive sampling is allowed by a certified tester.

  Clients should be instructed not to disturb suspected asbestos containing material.

- **On pipes, furnaces, other small covered surfaces -** Sub-grantees will assume asbestos is present in covering materials. Encapsulation is allowed by an AHERA asbestos control professional and should be conducted prior to blower door testing. Removal may be allowed by an AHERA asbestos control professional on a case-by-case basis. AHERA testing is allowed by a certified tester. Clients should be instructed not to disturb suspected asbestos containing material.

b. Spray Polyurethane Foam (SPF) - Spray polyurethane foam is a widely used and highly-effective insulator and sealant; however, eye, skin, and inhalation exposures to its key ingredients can cause asthma, lung damage, other respiratory problems, skin and eye irritation, and other adverse health effects.

- When working within the thermal enclosure with spray urethane foam, follow the EPA guidelines or manufacturer's guidelines (available online at: http://www.epa.gov/dfe/pubs/projects/spf/spray_polyurethane_foam.html)
- When using spray urethane foam outdoors, isolate the area where the foam will be applied, take precautions to ensure the fumes will not be transferred to the indoor living area.
- Make sure all State and local fire codes are followed when spray polyurethane foam is used indoors.
- Sub-Grantees are required to have MSDS sheets in each weatherization vehicle with easy access to every employee.

- Auditors notify the client of the plans to use two-part foam and the precautions that may be necessary.

c. Radon - In homes where radon may be present:

- Provide the client with EPA's consumer guide to radon.
- Whenever conditions permit, exposed dirt must be covered with a vapor permeable ground cover.
- In dwellings where radon may be present, precautions should be taken to reduce the likeliness of making radon concentrations higher.
- Radon testing is an allowable DOE expense in locations with high radon potential.
- Radon abatement is not an allowable activity with DOE funds; major radon problems are deferred and referred to the appropriate local environmental agency.

d. Volatile Organic Compounds (VOCs) - Crew awareness of potential problems with formaldehyde and volatile organic compounds is important when addressing air sealing. Crews are instructed to remove any VOCs when possible and to give client education regarding the potential dangers. If removal cannot be performed or is not allowed by the client, the unit must be deferred.

7. *Lead Paint – Lead Safe Work*

Sub-Grantees or contractors will follow EPA's Lead; Renovation, Repair and Painting Program (RRP). In addition to RRP, weatherization requires all weatherization crews working in pre-1978 housing to be trained in Lead Safe Weatherization (LSW). Deferral is required when the extent and condition of lead-based paint in the house would potentially create further health and safety hazards.

Testing is allowed. Job site setup and cleaning verification is required by a Certified Renovator.

Each Sub-grantee or contractor must give notification to the occupants of homes to be weatherized regarding the potential hazards of lead paint and lead paint dust if the home was built prior to 1978. EPA's publication "Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools" must be given to an adult occupant of the affected home prior to beginning weatherization. For occupied homes, the weatherization staff, crew, or contractor must have an adult tenant or homeowner sign an acknowledgement after receiving the pamphlet. As an alternative to delivery in person, you may mail the lead hazard information pamphlet to the owner and/or tenant. Pamphlet must be mailed at least seven days before renovation. Mailing must be documented by a certificate of mailing from the post office.

OEO has developed and implemented a "Lead Safe Work Policy" on July 27, 2012 including standardized forms and processes to supplement information available from DOE and the Environmental Protection Agency (EPA). The policy provides additional information and guidance on LSW, proper practices, and documentation requirements.

LSW includes weatherization worker protection, general LSW work practice standards, and lead dust containment standards.

1. Level 1 Containment.

    a. Level 1 containment is required in pre-1978 homes when less than 6 ft2 of interior painted surface per room or 20 ft2 of exterior painted surface will be disturbed.
    b. Level 1 containment consists of methods that prevent dust generation and contains all debris generated during the work process. The containment establishes the work area which must be kept secure.
    c. Measures that may fall within this guideline include:
        i. Installing or replacing a thermostat.
        ii. Drilling and patching test holes.
        iii. Replacing HEPA filters and cleaning HEPA vacuums.
        iv. Changing furnace filter.
        v. Removing caulk or window putty (interior).
        vi. Removing caulk or window putty (exterior).
        vii. Removing weather-stripping.

2. Level 2 Containment.

    a. Level 2 containment is required when weatherization activities will disturb more than 6 ft2 of interior surface per room or 20 ft2 of exterior surfaces in homes built prior to 1978. Level 2 containment consists of methods that define a work area that will not allow any dust or debris from work area to spread. Level 2 containment requires the covering of all horizontal surfaces, constructing barrier walls, sealing doorways, covering HVAC registers with approved materials, and closing windows to prevent the spread of dust and debris.
    b. Measures requiring level 2 containment may include:
        i. Drilling holes in interior walls.
        ii. Drilling holes in exterior walls, removing painted siding.
        iii. Cutting attic access into ceiling or knee walls.
        iv. Plane a door in place.
        v. Replacing door jambs and thresholds.
        vi. Replacing windows or doors.

vii. Furnace replacements.

c. Additionally, Level 2 containment must ALWAYS be used where any of the following is conducted (even if the activities will disturb less than the hazard levels within the Level 1 category):
   i. Window replacement.
   ii. Demolition of painted surface areas.
   iii. Using any of the following: Open-flame burning or torching; machines to remove paint through high-speed operation without HEPA exhaust control; or operating a heat gun at temperatures at or above 1100 FO. Note that the use of a drill, reciprocating saw, or other power tool is considered a "machine" for removing paint. As examples: Cutting an hatch inside the dwelling or interior drilling of holes for the installation of insulation require level two containment.

3. There must be adequate documentation in the client file to demonstrate that lead safe weatherization measures were performed when necessary. Documentation should include photos of the site and containment set up, as well as a listing of materials used and measures taken. Post Work Inspector must also certify that LSW procedures were used and properly implemented.

4. WV WAP will adhere to EPA lead safe rules as written in the "Lead; Renovation, Repair, and Painting Program" Final Rule (LRRPP Final Rule), as directed by DOE.

5. Weatherization of HUD program housing stock, including HUD Section 8, is infrequent in West Virginia. These units will only be weatherized if the owner provides a Certificate of Lead-Based Paint Compliance (copy must be in client file) that documents abatement or control of any lead paint hazard has been addressed, and will agree that the local Sub-grantee will not be liable for any lead hazards, provided the safe work practices generally outlined above are employed.

6. In cases where the Sub-grantee cannot safely weatherize a home due to lead paint hazards, the Sub-grantee may defer the work. Such deferral will be considered by the state on a case-by-case basis. Sub-grantees may not weatherize dwellings where there are cases of documented or suspected lead poisoning. Additionally, they will not weatherize homes where there is an extraordinary lead paint hazard with no means to abate the hazard, including insufficient funds or insufficient training to properly address the hazard.

8. ***Building Structures and Roofing*** - WV WAP crews often encounter homes in poor structural condition. In some cases, Weatherization Assistance Program services have to be deferred until the dwelling is made safe and able to weatherize. When possible,

Sub-grantees coordinate their efforts with other programs to enable and enhance services. Homes with conditions that require more than incidental repair should be deferred.

The Auditor will perform a visual inspection to ensure that access to areas necessary for weatherization is safe for entry and performance of assessment, work, and inspection. The client will be notified of structurally compromised areas.

9. ***Electrical Issues***

- **Electrical – other than Knob-and Tube Wiring** - Minor electrical repairs are allowed where health and safety of the occupant is at risk. Upgrades and repairs are allowed when necessary to perform specific weatherization measures.

  Auditors will perform a visual inspection. Voltage drop and voltage detection testing are allowed.

- **Electrical – Knob-and Tube Wiring** - Minor upgrades and repairs necessary for weatherization measures and where the health or safety of the occupant is at risk are allowed.

  Where live knob-and-tube wiring exists, the following conditions must be met in order to install attic insulation:

  a. Wiring insulation must be intact and complete with no exposed areas and connections.
  b. S-type fuses that match the size of the wiring must be installed if they do not already exist. Any modification of the electrical panel must have prior written permission from the client. The Sub-grantee may wish to contract with a licensed electrician where questionable safety conditions exist.
  c. When installing cellulose or fiberglass, there must be a minimum of 1-inch clearance from the wiring. Precaution must be taken to prevent the possible drifting of the product, which could result in contact with the wiring.

  The presence of knob-and-tube wiring, overloaded circuits, live bare wires, asbestos siding, or untreatable moisture in the wall cavities will be allowable reasons for not insulating exterior walls. If the problems can be corrected within reasonable means, the walls may be insulated.

10. ***Refrigerant Issues*** – Sub-grantees may reclaim refrigerant per the Clean Air Act of 1990, Section 608, as amended by 40 CFR 82, 5/14/1993. Qualified personnel use EPA testing protocols. Clients are instructed not to disturb refrigerants. Qualified personnel are trained on the EPA-approved section 608 type I or universal certification.

11. ***Code Compliance*** - The correction of preexisting code compliance issues is not an allowable cost other than where weatherization measures are being conducted. State and local (or jurisdiction having authority) codes must be followed while installing weatherization measures. Condemned properties and properties where "red tagged" health and safety conditions exist that cannot be corrected under this guidance should be deferred. The client will be informed of observed compliance issues.

12. ***Pests*** - In dwellings were pests are detected:

    1. Pest removal is cause for deferral unless other funds are available or the cost is considered when running NEAT or MHEA. Screening of windows and points of access is allowed to prevent pest intrusion.
    2. Auditors will assess the presence and degree of infestation and risk to workers.
    3. Auditors will inform clients of the observed condition and associated risks.

13. ***Ventilation*** - A complete review of the ASHRAE 62.2-2013 minimum ventilation standards was completed during the last program year. During this review stage OEO evaluated the most effective methods for full compliance to ASHRAE 62.2-2013. Sub-grantees key personnel received training at the West Virginia Community and Technical College in August 2013.

    Weatherization trained personnel will calculate the ventilation requirements for each home utilizing a ASHRAE 62.2-2013 spreadsheet to ensure adequate indoor air quality. Continuous and/or intermittent ventilation fans will be installed based upon spreadsheet calculations. The ASHRAE 62.2-2013 standard was implemented December 1, 2013 and is monitored by the Office of Economic Opportunity field monitors.

    For homes that require added ventilation, agencies must implement a ventilation strategy that meets the requirements of ASHRAE 62.2-2013. Agencies are required to evaluate any preexisting mold and moisture conditions, potential spot ventilation needs and pre and post fan flow rates. The agency Quality Control Inspector will verify that fan flow rates have been met based on design requirements.

    Implementing ASHRAE 62.2-2013 will not be required where acceptable indoor air quality already exists. Existing ventilation systems will not be updated if found to be adequate and in good operating condition.

    Sub-grantees will provide clients with information on function, use, and maintenance of ventilation system and components. Sub-grantees will provide a disclaimer that ASHRAE 62.2-2013 does not account for high polluting sources or guarantee indoor air quality.

14. ***Window and Door Replacement, Window Guards*** - Replacement, repair or installation of windows or doors is not an allowable health and safety cost, but may be allowed as an efficiency measure if justified by the NEAT or MHEA audit.

15. ***Injury Prevention of Occupants and Weatherization Workers*** - Minor repairs may be done when weatherizing a home in order to prevent injury to weatherization workers and to occupants. These repairs may only be done to the extent of ensuring safety.

16. ***Occupational Safety and Health Administration (OSHA) and Crew Safety*** - Weatherization personnel must follow OSHA standards and Material Safety Data Sheets (MSDS) and take precautions to ensure the health and safety of themselves and other personnel. MSDS must be posted wherever workers may be exposed to hazardous materials.

    Sub-grantees must perform assessments to determine if crews are practicing and utilizing safe work practices.

    1. Sub-Grantees are also required to have bi-monthly safety meetings.
    2. All auditors, crews, and contractors must use and understand the importance of personal protection equipment (PPE).
    3. OSHA 10 training is required for all current weatherization personnel. OSHA training for new crew members or contractors must be completed no later than one year from the date of hire.
    4. OSHA 30 training is required for all crew leaders, either hired-in or promoted, within one year of hire or promotion.

V.8 Program Management

V.8.1 Overview and Organization

The WV WAP is administered by the Office of Economic Opportunity (OEO). The OEO also administers the Community Services Block Grant (CSBG), Emergency Solutions Grant, Housing Opportunities for Persons with AIDS (HOPWA), and Low-Income Home Energy Assistance Program (LIHEAP) (Application Intake).

V.8.2 Administration Expenditure Limits

For PY 2013 – 2014, the statutory 10% of administrative funds will be divided equally between the Sub-grantees and OEO. The State will retain 5% of the grant for their administrative costs and 5% will be made available to program Sub-grantees, as per DOE guidance in WPN 12-01.

As per DOE WPN 13-01: *"A Grantee may provide for Sub-grantees who receive less than $350,000 of new DOE appropriated funds with permission, to use up to an additional 5 percent of their sub-grants for administration if the Grantee has determined that such Sub-grantee requires the additional amount to effectively implement the administrative requirements of the Program."*

A separate budget category is permitted by DOE for financial audits. The cost of these audits was previously charged to the already over-burdened administrative cost category and sometimes resulted in financial audits of less than adequate quality. The OEO is providing some relief to the Sub-grantees by allowing these charges to come off the top of the grant, if the Sub-grantees meet the threshold contained in A-133. These costs will be actual costs of the weatherization portion of the audit.

V.8.3 Monitoring Activities

Introduction

Monitoring is one of the most significant and intricate procedures undertaken by OEO. OEO must adhere to multiple funding bodies' guidelines as well as construct and adhere to state-specific guidelines and protocols structured in a way to facilitate successful and functional program management throughout the state of West Virginia. Monitoring is one of the many tools utilized by OEO in an effort to continually improve the capabilities and effectiveness of the various Sub-grantees. Monitoring is a systematic process of gathering and evaluating information, as well the physical visitation of sites, in order to support and assess the Sub-grantees and their programs in terms of performance and capacity. As a facilitator of federal dollars, OEO ensures that grant funds are expended in accordance with applicable law, including regulations contained in 10 CFR part 440; applicable OMB circulars; DOE Financial Assistance Rule (10 CFR part 600); WPNs, and other policies and procedures that DOE may issue. The WV WAP Monitoring Plan will include the following areas:

Approach

OEO will conduct a monitoring of each Sub-grantee at least once a year, provide a written report to the Sub-grantee within thirty (30) days, and maintain a file related to monitoring which is accessible by DOE during its monitoring visits. The monitoring tools utilized by OEO are based off of tools and templates provided by DOE through *WPN 12-5 Updated Weatherization Assistance Program Monitoring Guidance* and *WPN 12-4 Weatherization Assistance Program Financial Management Training Toolkit.* OEO will also conduct periodic desk-monitoring utilizing the database management system used to track all weatherization work, at times coupled with the statistical management system used for production and expenditure tracking. This process will serve as a pre-monitoring activity as well as a process facilitating routine review and proper oversight as needed. The desk-monitoring activity is utilized to confirm that measures are performed and tracked according to program standards, and that diagnostic and health and safety tests are performed and documented correctly. This process allows for the identification of trends that may convey

a training need, or specific jobs that may need to be monitored due to documentation of measures. For PY 2013-2014, OEO will increase its desktop monitoring capabilities to increase efficiency and effectiveness as well as to reduce expenses in light of decreased funding.

The monitoring performed by OEO will be broken down into three components which may be performed at different times and may have differing frequency depending on quality of agency performance in each focus area. The monitoring will include the following focus areas and details:

Programmatic and Management Monitoring

- Sub-grantee Production Analysis and Review (ensuring benchmark and yearly goal completion)
- Financial/Administrative Components
- Inventory (Equipment and Materials)
- Warehouse
- Rolling Stock
- Eligibility processes and compliance
- Rental unit documentation and process compliance
- Reporting and funding requests
- Client Files and related documentation
- Energy Audit documentation
- Health & Safety Components (Respirator tests/Safety meetings/LSW documentation/Warehouse & Vehicle Safety/Health and Safety percentage)
- Compliance with all OEO mandated forms, processes, and policies (Audit form, PWI form, etc.)
- Energy Education
- Training & Technical Assistance
- Procurement Practices
- Client Prioritization methods
- Utility (leveraged) fund usage, documentation, and reporting
- Insurance
- Agency personnel qualifications/certifications and associated work performed
- Internal corrective action procedures (for reduction of deficiencies)

Field Monitoring

- Program Overview (Client File Review, Work Orders, documentation of measures etc.)
- Energy Audits
- Weatherization of Units (all work performed on dwellings)
- Health & Safety (HVAC, LSW compliance, mold/moisture, electrical etc.)

- Final Inspections
- Client interaction

Field monitoring will incorporate all new DOE mandated regulations including ASHRAE 62.2-2013 (and any applicable updates when implemented), Zonal Pressure Diagnostic standards, and Combustion Appliance Zone testing compliance.

Fiscal Monitoring

- Financial Policies and Procedures
- Cash Management
- Procurement policies and practices
- Audits
- Financial management of Material Inventory
- Financial management of Property and Equipment
- Contracts/Sub-awards
- Payables/Receivables/Expenses Management
- Invoicing and Reporting accuracy
- Review of Funding Requests and specific line items/expenses for accuracy and proper documentation
- Bank records and reconciliation
- Financial Statements
- Lines of Credit
- Financial Management of utility (leveraged) funds

A-133 Financial Audits

Agency A-133 audits are due to OEO within 9 months of the end of the Agency's fiscal year. If the deadline is not met, OEO sends the agency a reminder notice via email using the Audit Extension Request Language for Email and the Audit Extension Request Form. Once an agency submits an extension request using the Audit Extension Request Form, OEO will review for approval or disapproval. This form will be signed by an OEO authorized employee and emailed to the Agency Executive Director.

OEO will verify when the audit was submitted to the Federal Clearinghouse, and note this on the Annual Audit Chart, maintained by the Fiscal Division of OEO.

The Fiscal Division will review all audits within 90 days of receipt using the OEO Grantee Audit Review Checklist. A Grantee Audit Review Summary is completed for the audit, and maintained on the shared drive. Depending on the results of the review, OEO forwards to the agency either (1) Letter indicating no findings or (2) Letter requesting a Corrective Action Plan (CAP). The Agency has six weeks to submit their CAP to OEO.

If an agency has not submitted the CAP within the deadline, the CAP Reminder Email will be forwarded to the Executive Director. Upon receipt of the CAP, OEO will review and forward to the agency either the (1) CAP Acceptance Email or (2) another correspondence requesting modification to the CAP.

Monitoring Staff

Monitoring will be performed by several OEO staff members with differing credentials and areas of expertise to effectively monitor all of the various components of the WV WAP as outlined above. Monitoring staff members may monitor more than one component. The current OEO monitors are as follows:

Programmatic and Management Monitors (Administrative Monitors):

- 1 Weatherization Administrator
- 1 Weatherization Assistant Administrator
- 1 Weatherization Systems Specialist
- 1 Programmatic Specialist

Qualifications: The qualifications of the Programmatic and Management Monitors (Administrative Monitors) include extensive experience with the weatherization program (both at the Grantee level and Sub-grantee level) as well as certifications and education that benefit the monitoring team as they oversee and evaluate the Sub-grantee management of the weatherization program. The staff members have experience in management and finance/accounting. The certifications range from Building Performance Institute (BPI) certifications, Results Oriented Management and Accountability (ROMA) certification, Masters of Business Administration (MBA), and multiple WV WAP specific certifications (e.g. Quality Assurance Inspector Certification, HVAC Systems Inspection Certification, Weatherization Assistant Training Certificate) as well as attendance to regional and national energy conferences.

Field Monitors (Technical Monitors):

- 3 Field Specialists

Qualifications: The qualifications of the Field Monitors (Technical Monitors) include extensive experience with the weatherization program as well as extensive building science knowledge. The Field/Technical monitors have several BPI certifications, Weatherization Assistant Training Certificate, as well as multiple WV WAP specific certifications (Energy Auditor, Quality Control Inspector, multiple HVAC certifications) as well as attendance to regional and national energy conferences as well as participation in the conducting of workshops.

Fiscal/Financial Monitors:

- 1 Weatherization Assistant Administrator
- 1 Programmatic Specialist

- 1 Program Support Coordinator

Qualifications: The qualifications of the Fiscal/Financial Monitors include education (bachelor's and master's level) and experience in the accounting, finance, and management fields, as well as knowledge of federal financial requirements. Some of the monitoring staff experience is specifically with the Weatherization Assistance Program both on the Grantee and Sub-grantee level. The Fiscal/Financial monitors will also utilize OEO's CFO and experienced accounting staff as additional resources during the monitoring activities as needed.

OEO will pursue additional certifications as identified and/or needed as the Program Year progresses.

Monitoring Expenditures:

The Monitoring staff members will be paid out of the T&TA budget category. The estimated percentage of T&TA funds directed toward monitoring is 25%. OEO has budgeted $5,520 for travel expenses related to monitoring activities. These funds will be supplemented by Department of Health and Human Resources (DHHR)/LIHEAP funds.

Monitoring Schedule:

The monitoring schedule will follow a basic plan of one programmatic, field, and fiscal monitoring performed each month for the 12 Sub-grantees. This plan is only tentative as visits to a Sub-grantee could increase if there are serious deficiencies identified. The scheduling of the Sub-grantees will depend in part of when their last visit occurred as well as reasonably taking into consideration geographic location and time of the year. Also, any Sub-grantees that had major deficiencies identified from the PY 2012-2013 monitoring process and have not had a follow-up visit (due to deficiencies being identified toward the end of PY 2012-2013); these Sub-grantees will be first priority in PY 2013-2014, with additional reviews scheduled as necessary until deficiencies are corrected.

Visit

OEO will complete a review of at least 5 percent of each Sub-grantee's completed DOE weatherized units. OEO will also review units "in progress" beyond the 5 percent completed units, in order to assess: quality and compliance; appropriate and allowable materials; appropriateness and accuracy of energy audits; final inspections; safe work practices, such as lead safe weatherization protocols; and other factors that are relevant to on-site work.

An important continued focus of WV WAP sub-grantee monitoring for the PY 2013-2014, will be the supplemental components to the Weatherization Program, including but not limited to the utility partnership programs, the Energy Crisis Intervention Program, the Electrical Upgrade Component, and the Weatherization Related Home Repair Component. These projects provide additional funding for the WV WAP, enable additional work to be done on a large percentage of

weatherized homes, and make possible the weatherization of some homes that may have had to be deferred because of necessary repairs that are outside the scope of the DOE WAP. Monitoring of the supplemental components will be part of the standard monitoring process (unless determined necessary to do otherwise) focusing on the correct utilization, tracking, and accountability of the supplemental component funds.

Upon the completion of each monitoring visit of any of the three components, an exit conference is held between the members of the Sub-grantee (as selected by the Sub-grantee management) and the monitoring team to discuss strengths, weaknesses, findings, trends for concern, and monitor recommendations. As per DOE WPN 12-5, within 30 days after each visit, the OEO will prepare a written report for the Sub-grantee that describes the current monitoring assessment (identify any findings, concerns, recommendations, commendations, and best practices) and any corrective actions as part of a Quality Improvement Plan, if applicable.

OEO has a system in place to review each Quality Improvement Plan provided by the Sub-grantees either approving of the plans made or requiring additional information or actions. Regardless of monitoring focus, OEO follows up with each Sub-grantee to ensure that the corrective actions outlined in the plan have been implemented either through a subsequent monitoring visit or requiring the submission of documentation confirming the corrections.

OEO increases visits (both the number of units reviewed and the frequency of monitoring visits) to the Sub-grantee until it can be assured deficiencies are resolved. If Health and Safety issues that present imminent danger to people in the house are found during a visit, OEO requires the Sub-grantee to immediately resolve the issues. Sub-grantee noncompliance or repeated unresolved findings (based on a minimum of 2 monitoring visits at a Sub-grantee) will be reported to the DOE Project Officer. Sensitive or significant noncompliance findings, such as waste, fraud, or abuse must be reported to DOE immediately, by OEO.

Once the deficiencies are corrected and procedures are put in place to prevent reoccurrence, the OEO will resume the 5 percent sampling of the Sub-grantee's work in subsequent monitoring visits. A letter from OEO confirming the lowering of the monitoring sample will be provided to the Sub-grantee.

Tracking & Analysis

The Sub-grantee monitoring process from notification to final approval and confirmation of corrective actions are tracked by OEO to final resolution in a Monitoring Log. OEO also tracks the most significant deficiencies (findings and trends for concern) in a Root Cause Analysis spread sheet to evaluate and analyze trends of the Sub-grantees' performance. This process allows for the identification of training and technical assistance needs and is an evaluative tool used to keep both OEO and the Sub-grantees on a path of continuous improvement.

V.8.4 Training and Technical Assistance Approach and Activities

The state's Training and Technical Assistance (T&TA) funding is used to pay salary, travel, and operational costs for OEO staff to provide monitoring/T&TA to Sub-grantees. Sub-grantee expenses for participation in T&TA activities (including special conference attendance) will be funded from DOE T&TA and/or other funds. The OEO T&TA activities T&TA activities are intended to maintain or increase the efficiency, quality, and effectiveness of the Weatherization Program at all levels and are designed to maximize energy savings, minimize production costs, improve program management and crew/contractor "quality of work," and/or reduce the potential for waste, fraud, abuse, and mismanagement.

The state assesses training needs regularly as part a constant process as the Program Year progresses. This process and the related training plan are flexible and OEO incorporates information from the process into the training plan as needed. OEO assesses T&TA needs of its Sub-grantees through:

- Grantee Monitoring efforts
- Internal Trend analysis
- Communication with national experts regarding new technologies and/or standards/practices
- Guidance as provided by the Department of Energy (DOE) including industry-wide initiatives and future program requirements (certifications, health and safety implementation).
- Monitoring visits from DOE or OIG

Training

The WV WAP has made an important transition with regards to trainings provided to the Sub-grantee network over the last Program Year. Trainings and certifications will be provided by either the West Virginia Community and Technical College System (WV CTC) or by an accredited and certified Weatherization Training Center within close proximity to WV.

Training will be presented in various venues and settings including traditional classroom settings, on-site/hands-on opportunities, and online/web based sessions.

Credentials/Certifications

OEO places great emphasis on maintaining workforce credentials for both Grantee and Sub-grantee staff and build upon such credentials. Credentials, certifications, and certificates are all tracked for Grantee and Sub-grantee staff in the database management system. Credentials,

certifications, and certificates are reviewed and training, continuing education, re-testing etc. is planned and performed as necessary to ensure Grantee and Sub-grantee staff maintain all necessary credentials.

OEO Program Specialists must maintain proficiency on new methods and techniques pertinent to the Weatherization Program. The OEO Program Specialist field staff must maintain levels of knowledge aligned with the Weatherization Standardized Curricula as developed by a WV CTC and are also furnished with all State and Federal regulations as they are released. At this time, OEO Field Specialist staff have BPI Certifications. Additional BPI certification will be pursued by OEO staff as identified and/or needed.

The WV WAP understands the direction that the weatherization program is moving with regards to the requiring of national certifications. The WV WAP participated in the BPI Pilot program that was implemented in partnership with WAP and DOE. The WV WAP had workers tested or Energy Auditor Certifications as well as Quality Control Inspector Certifications. As funding allows, the WV WAP will continue to pursue BPI certifications for our Sub-grantee workers as the incorporation of DOE WAP curricula, certifications, and standards continues to be incorporated into BPI certifications. OEO feels the partnership between DOE/WAP and BPI is a great step toward standardization of the weatherization and energy efficacy industries

Due to funding and time constraints, OEO understands that it may not be possible to get all Sub–grantee staff certified by BPI. As another option, there are also defined certification processes through the WV CTC system, developed in conjunction with OEO, for Sub-grantee staff specific to their position. In order to be certified at a particular position, the person must attend the certification training and be able to pass the written test and field test. The following are the current defined certifications:

1. Energy Auditor Certification
2. Quality Control Inspector (QCI) Certification
3. Energy (Client) Educator Certification
4. Lead Renovator Certification
5. HVAC Technician Certification

When the WV WAP Standardized Curricula is fully implemented and available through the WV CTC system and the West Virginia Weatherization Training Center (WV WTC), the following certifications will be required for the respective weatherization staff positions in addition to the certifications listed above:

1. Crew Technician
2. Crew Leader (Chief/Supervisor) Certification

In addition to the WV WAP Standardized Curricula level certifications, the WV WAP/WV CTC system will periodically offer licensing testing through the State Fire Marshal's Office and EPA certifications testing for the following:

1. HVAC Electrician License
2. Single Family Dwelling Electrician License
3. EPA Section 608 Refrigerant Technician Certification
4. EPA Lead Renovator Certification

Special projects are constantly being undertaken to ensure that the WV WAP keeps up with state-of-the-art energy conservation and management techniques. The following are other additional trainings that will be offered throughout the year as needed, especially with regards to the implementation of the WV WAP Health and Safety Plan:

1. ASHRAE 62.2 -2013 (and any updated versions as implemented) and Combustion Appliance Zone (CAZ) training
2. Lead Safe Work Practices Training
3. Healthy Homes Training
4. Weatherization Assistant Training
5. Infrared Camera Training

There are certain trainings that are mandatory in order to be in compliance with rules and regulations in performance of the weatherization program. Each sub-grantee must have a certified Energy Auditor and Quality Control Inspector in order to perform those functions. If an agency does not have such due to losing an employee or another circumstance, then attending one of those trainings would be mandatory or the functions must be contracted out to a Sub-grantee with certified staff. There is also a requirement that each Sub-grantee has a certified EPA Lead Renovator on staff as well as periodic mandatory trainings regarding new requirements with health and safety related measures (ASHRAE/CAZ etc.) Also, HVAC work should not be performed by Sub-grantee staff that does not have the proper HVAC certification.

Non-compliance with regards to any mandatory trainings without the written approval from OEO due to extenuating circumstances could result in a Sub-grantee not able to perform certain functions with their staff until the requirements are met.

There are no certification requirements imposed by OEO of Sub-grantee staff prior to hire. However, all weatherization technicians must have OSHA 10 certification and all Crew Supervisor's and Coordinators must have OSHA 30 certification. These trainings must be obtained by the Sub-grantee within a reasonable amount of time from the date of hire. Also, if a new hire is to perform any functions that require a certification (QCI, Energy Auditor, HVAC) then the certification must be obtained before any work is performed.

Client Education

Energy Education is one of the most important post-weatherization processes to ensure the maximum effectiveness of the weatherization measures. Each Sub-grantee has identified at least one Energy Educator, who attends training and certification, provided by the WV CTC

system. Such training utilizes role-playing, participation, and discussions to acquire the adult education skills to establish an effective means of communication between the Energy Educator and the client. After passing a certification test, the Energy Educator will work with clients to affect change in poor energy conservation habits.

The Energy Educator utilizes a tabletop easel with energy saving tips and maintenance tips for weatherization measures. The process is intended to be interactive between the Energy Educator and client. A key element of the process is a "contract" called the Energy Savers Partnership Plan, where the client agrees to do certain actions to conserve energy in their home. WV WAP has also received materials and guidance from utilities partners to improve the client energy education process.

Technical Assistance

The WV WAP will continue to utilize the traditional approaches of on-site program, administrative, fiscal, and in-field technical assistance based on monitoring findings and/or needs of particular Sub-grantees.

Technical assistance will continue at this time to be provided by State Weatherization Program Specialists. The Program Specialists also perform Sub-grantee monitoring, so their familiarity with each Sub-grantee's operations enables focused attention to specific technical assistance needs of each agency. Compilation of monitoring report findings, discussions at staff meetings, peer exchanges, Sub-grantee feedback, and research of state-of-the-art energy conservation techniques all help determine the focus of the technical assistance.

Energy Savings:

As mentioned in the State Plan Annual File, the state is developing a system to track and compare projected energy savings with actual energy savings as per 440.14(c)(4). The process will entail utilizing data from the "Weatherization Assistant Recommended Measures Output Report" coupled with data analysis on energy savings for specific measures provided by a utility company. After a comparison of energy savings projections and actual energy savings data across the state, the WV WAP can then compare productivity and associated energy savings data from the individual Sub-grantees. This data will contribute to identifying areas of training or technical assistance needed for the work being performed in the field.

Grantee Assessment:

Training needs have been identified and are continuously evaluated. The first priority is providing trainings to be in compliance with any new DOE regulations or guidance. After that is met, then trainings are scheduled by the greatest need; i.e. the number of Sub-grantees that need a particular training. At the same time, OEO will evaluate how many BPI certifications have been obtained and how many more need to be obtained along with funding that can be

utilized for such. OEO will assess on a quarterly basis both the needs of the Sub-grantees as well as funds that are available to meet those needs and will plan accordingly.

V.9 Energy Crisis and Disaster Response Plan

V.9.1 Energy Crisis

The WV WAP utilizes LIHEAP WAP funds to operate the Energy Crisis Intervention Program (ECIP). The intent of ECIP is to provide emergency heat for no-heat (based on inoperable or malfunctioning equipment) households during the winter heating season. The program addresses non-operable or severely malfunctioning and unsafe heating systems. Any household that is eligible for WAP is eligible for ECIP services. Any household that receives the emergency heating system repairs or replacements from ECIP must apply for regular WAP services. ECIP provides emergency assistance within 72 hours to insure the household will have heat. WAP services will typically be provided by the end of the program year, unless conditions exist that deems the dwelling ineligible for weatherization services at that time.

V.9.2 Disaster Response Plan

DOE-issued *Weatherization Program Notice 12-7 Disaster Planning and Relief* allows additional work to be done on homes due to natural disasters. In the event of a declared Federal or State disaster, allowable expenditures under WAP include:

- The cost of incidental repairs to an eligible dwelling unit if such repairs are necessary to make the installation of weatherization materials effective.
- The cost of eliminating health and safety hazards, elimination of which is necessary before the installation of weatherization materials (10 CFR 440.18(d)(9); 10 CFR 440.18(d)(15).
- To the extent that the services are in support of eligible weatherization (or permissible re-weatherization) work, such expenditure would be allowable.

Permissible re-weatherization – In the event of a declared Federal State disaster, weatherization crews may return to a unit reported as a completion to DOE that has been "damaged by fire, or act of God to be re-weatherized, without regard to date of weatherization", 10 CFR 440.18(f)(2)(ii). Local authorities must deem the dwelling unit(s) salvageable as well as habitable and if the damage to the materials is not covered by insurance or other form of compensation.

- Debris removal from a dwelling unit that is not to be weatherized would not be an allowable cost.
- 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.

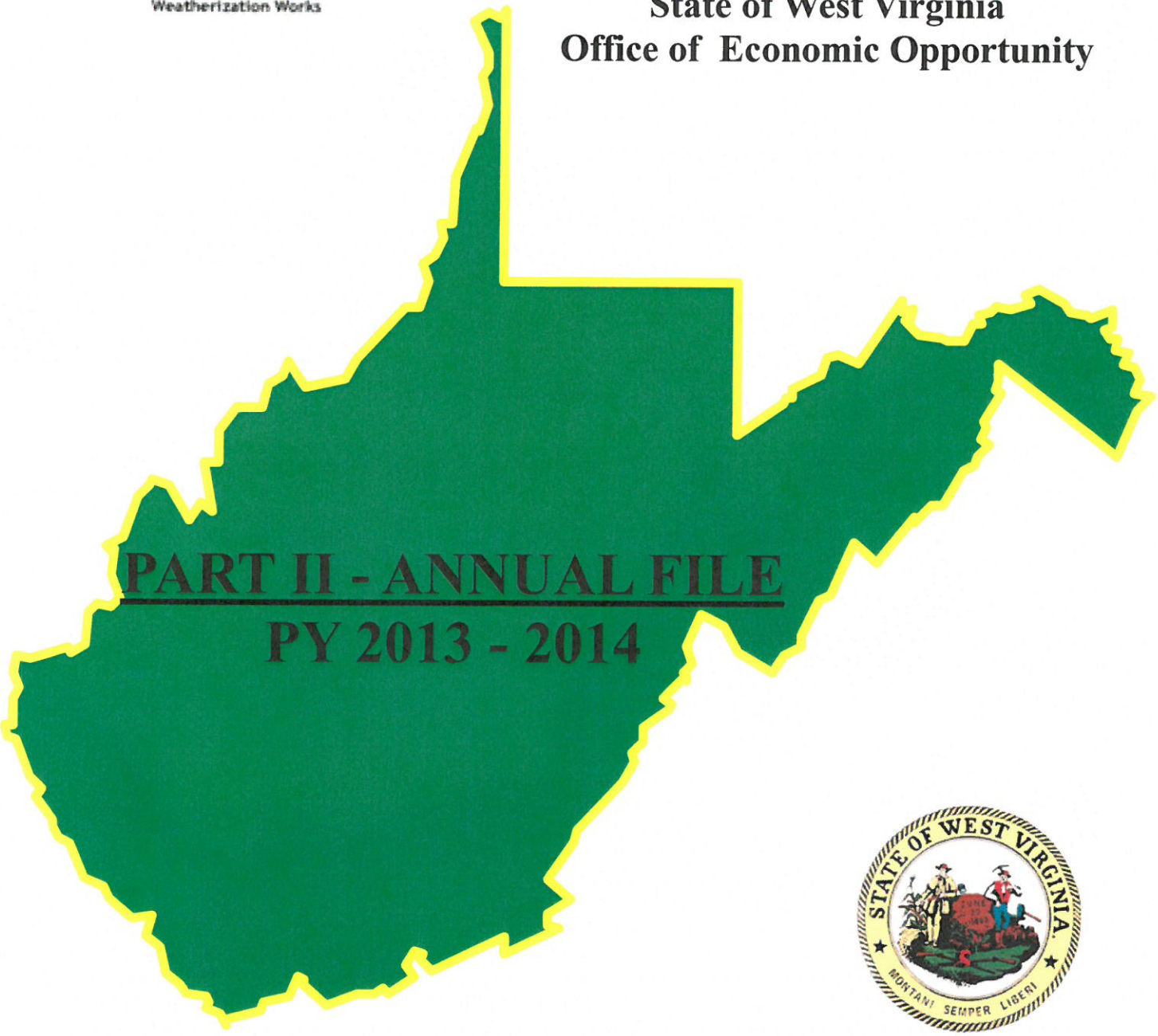
- Using DOE funds to pay for weatherization personnel to perform relief work in the community as a result of a disaster is not allowable.
- Local agencies may use weatherization vehicles and/or equipment to help assist in disaster relief provided by WAP is reimbursed according to the DOE Financial Assistance Regulations 10 CFR Part 600.

Reprioritization of weatherization requests coming from the disaster area

WAP rules require that priority be given to identifying and providing weatherization assistance to elderly persons, persons with disabilities, families with children, high residential energy users, and households with high energy burdens (10 CFR 440.16(b)). However, it would be permissible to consider in households located in the disaster area, as a priority as long as the households are eligible and 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.

West Virginia Weatherization Assistance Program

State of West Virginia
Office of Economic Opportunity



PART II - ANNUAL FILE
PY 2013 - 2014

State of West Virginia
Office of Economic Opportunity

U.S. Department of Energy
Program Year: 2013 - 2014
State Plan Annual File

IV.1 SUB-GRANTEES

		Tentative	
Grantee	**City**	**Funding**	**Units**
CHANGE, Incorporated	Weirton	$124,005	17
Coalfield CAP	Williamson	$253,392	34
Community Action of South Eastern West Virginia	Bluefield	$210,119	28
Community Resources, Incorporated	Parkersburg	$269,753	36
Council of the Southern Mountains	Welch	$44,564	6
Eastern West Virginia Community Action Agency	Moorefield	$222,606	30
Mountain CAP of West Virginia, Incorporated	Buckhannon	$104,198	14
MountainHeart Community Services	Oceana	$93,434	12
Nicholas Community Action Partnership	Summersville	$36,600	5
North Central West Virginia Community Action Association, Incorporated	Fairmont	$466,094	62
PRIDE Community Services	Logan	$50,807	7
Southwestern Community Action Council	Huntington	$277,288	37
TOTALS		$2,152,860	288

IV.2 WAP Production Schedule:

Total Units (excluding re-weatherized): **285**

Re-weatherized Units: **3**

Average Unit Costs, including Re-weatherization, Subject to DOE Program Rules	
VEHICLE & EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)	
A. Total Vehicles & Equipment ($5,000 or more) Budget	$0
B. Total Units Weatherized	285
C. Total Units Re-weatherized	3
D Total Dwelling Units to be Weatherized and Re-weatherized (B+C)	288
E. Average Vehicles & Equipment Acquisition Cost per Unit (A divided by D)	$0
AVERAGE COST PER DWELLING UNIT (DOE RULES)	
F. Total Funds for program Operations	$1,592,662
G. Total Dwelling Units to be Weatherized and Re-weatherized (from line D)	288
H. Average Program Operations Costs per Unit (F divided by G)	$5,530.08
I. Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	$0
J. Total Average Cost per Dwelling (H plus I)	$5,530.08

IV.3 ENERGY SAVINGS

The West Virginia Weatherization Assistance Program (WV WAP) will utilize the WAP algorithm to calculate projected energy savings. The estimated energy savings for PY 2013-2014 is 8,784 MBtu. The state is developing a system to track and compare projected energy savings with actual energy savings as per 440.14(c)(4). The process will entail utilizing data from the Weatherization Assistant Recommended Measures Output Report coupled with data analysis on energy savings for specific measures provided by a utility company.

Energy Savings		
DOE Program	**Amount**	**Line**
Total DOE State Weatherization Allocation	$2,520,169	(a)
Total Cost associated with Administration, T&TA, Financial Audits, and Insurance	$927,507	(b)
Subtract the amount entered in line (b) from line (a), for a total Federal (DOE) funds available to weatherize homes	$1,592,662	(c)
State Average Cost per Home	$5,530	(d)
Divide the amount entered on line (c) by the amount entered on line (d), for Total Estimated Homes to be Weatherized	288	(e)
Multiply (e) by 30.5 MBTU for Total Annual Estimated Energy Savings resulting from DOE appropriated funds	8,784	(f)

The PY2013 energy saving calculations uses the most recent Metaevaluation of the National Weatherization Assistance Program (ORNL/CON-493).

IV.4 DOE-Funded Leveraging Activities:

WV WAP plans to continue to actively pursue non-Federal resources to supplement the Program, especially with post-ARRA funding reductions, through the development of leveraging projects and partnerships. The WV WAP expects at least a dollar return for every dollar invested in leveraging project activity. Weatherization leveraging activities in WV WAP since 2002 have consistently and successfully produced a greater number of dollars leveraged than expended every year on leveraging activities.

OEO will have a staff member that will continue to oversee leveraging activities. For PY 2013-2014, OEO plans to utilize **0.82% ($20,669)** of the annual formula DOE allocation for leveraging activities.

Planned activities will include the following objectives to increase the scope of weatherization services to low-income West Virginia households:

- Continued facilitation in the development of utility/WAP projects and partnerships, including representation as needed with activities in the West Virginia Public Service Commission. OEO staff will continue to be involved in technical assistance, planning, and rules development of any negotiated projects or partnerships. Expansion or altering of certain weatherization-utility partnership activity may be negotiated between the utility companies and the local weatherization providers, with OEO made fully aware of any changes made in this manner.

- Continued facilitation of the expansion of Sub-grantee leveraging activities by:
    - Assisting Sub-grantees and West Virginia Community Action Partnership (WVCAP) through the negotiation of partnerships, agreements, and other arrangements;
    - Presentation of arguments and associated activities before state or local agencies, as contained under Section 142 of the Energy Policy Act of 1992 (amended in 2005) and providing training and technical assistance support to WVCAP and Sub-grantees as part of their active participation in utility rate proceedings and process in West Virginia; and
    - Continued contact with both the utility industry and the private energy service company network

- Continue to provide support and leadership to Sub-grantees and WVCAP to provide tools and resources to assist in weatherization outreach, possibly including fall Energy Awareness activities. Such activities involve:
    - Support in holding leveraging-related meetings;
    - Preparation of statewide weatherization statistical documents;
    - Preparation of public information/energy efficiency data; and

- Technical assistance in the organization of weatherization site demonstrations at the local sub-grantee level to illustrate program technology for policymakers and other partners.

It is anticipated that continued leveraging activities will enable the WV WAP to enhance and expand comprehensive low-income weatherization services and be viewed as a leader in energy conservation technology and a viable partner in conservation projects.

Listed below are the identified funding sources outside of DOE funding for the WV WAP at this time. However, it is a goal of the WV WAP to continue to aggressively pursue all funding possible to support and build upon the weatherization program in the state of West Virginia. This pursuit may include but not be limited to grants, foundation funds, and other non-federal partnerships.

Low-Income Home Energy Assistance Program (LIHEAP): The WV WAP will continue to utilize Low-Income Home Energy Assistance Program (LIHEAP) funds in the operation of the program. LIHEAP funds are used in accordance with DOE rules with a few exceptions, most notably the three Supplemental Components: Electrical Upgrade, Weatherization Related Home Repair, and the Energy Crisis Intervention Program (ECIP) upon approval of the Department of Health and Human Resources (DHHR)/LIHEAP Work Plan.

OEO worked with DHHR to expand upon the aforementioned components to allow for more versatility in the usage of the funds. The expansion included an amount of DHHR funds to be utilized for Training and Technical Assistance.

Through participation of rate-case energy advocacy intervention activity at the Public Service Commission of West Virginia, the WVCAP continues to work and advocate for utility-weatherization leveraging partnership initiatives such as the following:

Dominion Hope Gas: In spring of 2009, WVCAP had intervened in a Dominion Hope Gas Company rate increase case in northern West Virginia. This case became complicated as the Company was also put up for sale in an acquisition case, in which negotiations became very complex. Although a new low-income weatherization program was agreed to in negotiations, the sale of the Company fell through and all proceedings were tabled. However, communication was reestablished with Dominion Hope and the Company provided $300,000 for a low-income weatherization partnership for the Company's low-income rate payers. This partnership will be continued in PY 2013-2014.

AEP dba Appalachian Power Company and Wheeling Power Company: In early 2009, WVCAP had intervened in an Appalachian Power Company/Wheeling Power Company filing at the Public Service Commission of West Virginia, in a rate increase request. Through various meetings and proceedings over a period of 18 months, in the fall of 2010 the PSC of WV ruled that the Companies would offer various Demand Side Management (DSM) programs for a two year period of time. A Low-Income Weatherization DSM Program was approved, for gross costs

of $367,050 in year one, and $489,400 in year two. There were lengthy contract negotiations and development that occurred between AEP and OEO. A contract was finalized, implementing the DSM program in April of 2012. After one year, the contract and program scope were revised for improvement. The contract and scope was agreed upon by both OEO and AEP and the contract and program was extended through March 23, 2014.

FirstEnergy Corporation dba Mon Power Company and Potomac Edison Company: As of February 25, 2011, Allegheny Energy and its subsidiaries, merged and became part of the FirstEnergy family of companies headquartered in Akron, Ohio. In West Virginia, FirstEnergy will continue to utilize Potomac Edison Company for the service area in the eastern panhandle, and the Mon Power Company in the north-central service area of the state. From this point forward, the former Allegheny Power programs will be FirstEnergy programs.

In a rate case settlement with Allegheny Energy in the summer of 2010, the Company agreed to continue funding an Electric Efficiency Partnership (EEP), with the same program design as the previous EEP, which ran from July 2007 thru June 2010, for $250,000 per year. FirstEnergy has sustained this commitment after the merger with Allegheny Energy. Thus currently through the OEO and WVCAP weatherization delivery network, FirstEnergy will continue to provide $250,000 per year to the WV WAP for the continuation of an energy efficiency program.

As a result of a negotiated settlement in 2009 for a new 500 kV transmission line that would be run through part of West Virginia, OEO, in partnership with Allegheny Energy, agreed to a new "TrAILCo" (Trans-Allegheny Interstate Line Company) Electric Efficiency Partnership 'Plus' program. The TrAILCo EEP+ was designed to enhance the existing low-income Weatherization Assistance Program and what was known at the time as the Allegheny Energy EEP by expanding comprehensive energy efficiency services to low-income Allegheny Energy customers in the six county area that the TrAILCo transmission corridor passes through; North Central West Virginia Community Action Association serves Monongalia, Preston, and Tucker counties and Eastern West Virginia Community Action Agency serves Grant, Hardy, and Hampshire counties. TrAILCo EEP+ participation was restricted to those low-income customers who qualified for DOE Weatherization and are customers of FirstEnergy in the six county high transmission line corridor. The PY 2013-2014 will be the fourth year of an agreed upon five-year settlement of $500,000 per year.

FirstEnergy Corporation has also developed and had approved a Low-Income Check-Up Audit Program allowing the WV WAP Sub-grantees to perform "walk-thru" audits for low-income customers and address some basic baseload needs, as a complement to the WV WAP. This program was implemented in May 2012. This program will continue through PY 2013-2014. This program will differ than the others as the funds will not be administered by OEO or WVCAP; it is a contract between the utility company, its contracted entities, and the Sub-grantees. The program has been approved for five years, for a total of $2,785,919. The funding amount provided by FirstEnergy Corporation for year two of the program is $499,995.

The Policy Advisory Council (PAC) typically meets once a year with periodic updates sent to members. The last meeting took place on April 23, 2013.

Policy Advisory Council Members:

NAME	***ORGANIZATION***	***CONTACT INFORMATION***	***REPRESENTING***
Vacant Position	Representative from the WV Weatherization Coordinators		Weatherization Program Coordinators
Gaylene Miller	Senior State Director, AARP	GMiller@aarp.org	Elderly
Mary Chipps	Executive Director, WV Community Action Partnership	mchipps@suddenlinkmail.com	Community Action Partnerships
Jacqueline Roberts	Public Service Commission; Consumer Advocate Division	jroberts@cad.state.wv.us	Consumers in West Virginia
Rachael Coffman	Dollar Energy - Utility Assistance Fund	rcoffman@dollarenergy.org	Low-Income

The WV WAP PAC was reorganized in 2011. The PAC works to advise state weatherization staff on issues, challenges, and future direction of the program. The council is composed of members of associations and organizations serving the citizens of West Virginia. PAC members, by their leadership roles in the larger community, bring added value from an outside perspective to the program. The committee can also be an advocate for the general public about the Weatherization Assistance Program, low-income energy needs, and energy efficiency. The PAC will advise WAP staff on policy, based on their knowledge, perspective, and sensitivity to their particular constituency.

The PAC meets once a year or on an as needed basis to discuss pertinent issues and recommend broad policy implementation to insure an efficient program.

IV.6 State Plan Hearings:

A conference call with the Policy Advisory Council was held on April 23, 2013, for their input in the PY2013 DOE State Plan.

A conference call to review, discuss, and receive input from the Executive Directors and staff on the PY2013 DOE State Plan, was held on April 25, 2013.

The Public Hearing for the PY2013 DOE State Plan was held April 29, 2013, 11:00 am, at OEO Office, 700 Washington Street, East, 2nd Floor Conference Room. A transcript of the hearing is attached.

IV.7 Miscellaneous:

Historic Preservation

As noted in DOE Weatherization Program Notice 10-012, DOE in coordination with the Advisory Council on Historic Preservation (ACHP) and the National Conference of State Historic Preservation Officers (NCSHPO), has developed a Prototype Programmatic Agreement to address historic preservation requirements for the WAP. Our program is evaluating all section 106 reviews utilizing guidelines set forth in a Letter of Understanding with the WV Division of Culture and History State Historic Preservation Office (SHPO). All measures that fall outside the Weatherization Assistance Program exempt from weatherization Section 106 review are being approved by WV SHPO.

Our intention is to work very closely with our State SHPO office and to utilize the Prototype Programmatic Agreement (PA) to overcome the challenges before us while still meeting all guidelines of the Act as outline by NHPA. This will not only build a strong partnership that will prove advantageous to our respective organizations but also to the West Virginia families that we strive to serve.

West Virginia's State Energy Program (SEP) Office has not been able to negotiate a SHPO PA and consequently our state does not have an official DOE Historic Preservation PA. As a result, beginning in PY2010, our state Weatherization Program Office worked with WV SHPO to negotiate, draft and agree to a one year Letter of Understanding for Historic Preservation Section 106 review compliance for 2011 weatherization activities. This year, we have a two year Letter of Understanding with WV SHPO, through December 10, 2014.

Healthy Homes/Weatherization Plus Health

The WV WAP anticipates the incorporation of elements of the Healthy Homes and Weatherization Plus Health initiatives to help West Virginia's most vulnerable families and make their homes energy efficient, safe, and healthy. The WV WAP aims to develop a comprehensive, holistic approach coupled with Weatherization to help combat disease and injury in the home linking substandard housing and poor health. This method will allow the WV WAP to possibly address a wide array of health and safety issues, including lead poisoning, asthma (exacerbated by moisture, mold, and pests), exposure to radon and other toxic chemicals, and injury caused by old or dilapidated housing, among a myriad of others. The WV WAP plans to fund these efforts utilizing all available funding streams, collaborating with both federal and nonfederal partners. It is a goal of OEO to develop Healthy Homes guidance

and policy for the WV WAP Sub-grantees to provide detailed information about proper practices, allowable measures, documentation, and the appropriate funding sources to utilize.

Renewable Energy Systems:
Assistance under the WAP may be provided for renewable energy systems. Any renewable energy system measures implemented by a Sub-grantee must have OEO written approval prior to work being performed.

10 CFR §440.18 (Allowable Expenditures) incorporates the renewable energy system provisions and specifies a ceiling of $3000 per dwelling for labor, weatherization materials, and related matters, subject to annual adjustments. As per DOE WPN 13-1 Section 1.1, the current adjusted value is **$3,377** for renewable energy systems.

The adjusted average for renewable energy measures is not a separate average, but part of the overall adjusted average expenditure limit of $6,904.

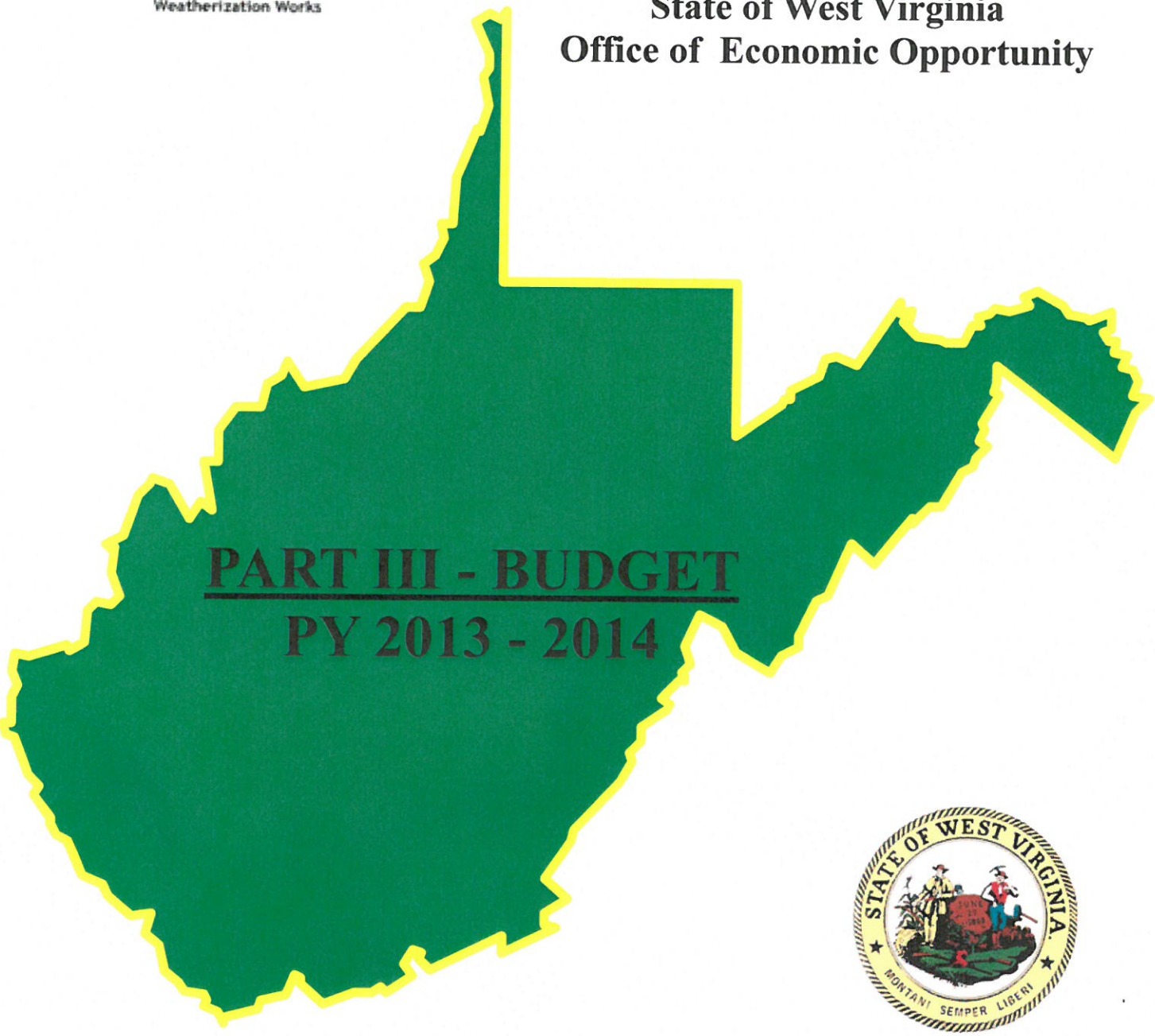
Because the total average cost per unit exceeds the renewable measures allowance, the major effects of the regulation are to provide criteria and a procedure for integrating renewables into the WAP, and to establish a process for evaluating petitions to use new or innovative renewable energy systems in the WAP.

Section 440.21(c)(1) specifies performance and quality standards criteria for renewable energy systems. Paragraph (c)(2) establishes a procedure for submission and action on petitions by manufacturers requesting the Secretary of Energy to certify a new technology or system as an eligible renewable energy system.

Approved renewable energy systems will be listed in Appendix A of Part 440, Standards for Weatherization Materials.

West Virginia Weatherization Assistance Program

State of West Virginia
Office of Economic Opportunity



PART III - BUDGET
PY 2013 - 2014

Budget Information
West Virginia Office of Economic Opportunity
Weatherization Assistance Program
Funded by US Department of Energy
Program Year: July 1, 2013 - June 30, 2014

SECTION A - BUDGET SUMMARY						
		Estimated Unobligated Funds		New or Revised Budget		
Grant Program Function or Activity (a)	Federal Catalog No. (b)	Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. DOE Annual Grant	81.042	$0		$2,520,169		$2,520,169
2. STATE			$0		$0	$0
3						
4						
5. TOTAL		$0	$0	$2,520,169	$0	$2,520,169

SECTION B - BUDGET CATEGORIES									
	Grant Program, Function or Activity								
6. Object Class Categories	(1) GRANTEE ADMINISTRATION	(2) SUBGRANTEE ADMINISTRATION	(3) GRANTEE T&TA	(4) LEVERAGING	(5) PROGRAM OPERATIONS	(6) LIABILITY INSURANCE	(7) HEALTH AND SAFETY	(8) FINANCIAL AUDITS	(9) TOTAL
a. Personnel	$49,235	$0	$92,504	$11,906	$0	$0	$0	$0	$153,645
b. Benefits	$19,694	$0	$37,001	$4,763	$0	$0	$0	$0	$61,458
c. Travel	$10,730	$0	$24,448	$0	$0	$0	$0	$0	$35,178
d. Equipment	$0	$0	$0	$0	$0	$0	$0	$0	$0
e. Supplies	$0	$0	$4,418	$0	$0	$0	$0	$0	$4,418
f. Contract	$4,332	$154,381	$20,000	$4,000	$1,592,662	$86,115	$276,645	$43,057	$2,181,192
g. Construction	$0	$0	$0	$0	$0	$0	$0	$0	$0
h. Other	$13,645	$0	$70,633	$0	$0	$0	$0	$0	$84,278
i. Total	$97,636	$154,381	$249,004	$20,669	$1,592,662	$86,115	$276,645	$43,057	$2,520,169
j. Indirect	$0	$0	$0	$0	$0	$0	$0	$0	$0
k. Totals	$97,636	$154,381	$249,004	$20,669	$1,592,662	$86,115	$276,645	$43,057	$2,520,169
7. Program Income	$0	$0	$0	$0	$0	$0	$0	$0	$0