

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
STATE PLAN/MASTER FILE WORKSHEET

(Grant Number: EE0007918, State: IN, Program Year: 2021)

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

V.1 Eligibility

V.1.1 Approach to Determining Client Eligibility

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

The following information is taken from Indiana's Weatherization Policy and Procedures Manual detailing the expectations of sub-grantees as it applies to client income verification and documentation:

INCOME ELIGIBILITY

The Weatherization sub-grantee staff or its subcontractor is obligated to review and determine WAP eligibility status for anyone requesting an application. No unit will be weatherized without documentation that the unit is an eligible unit, as defined as 10 CFR 440.22. The local sub-grantees verify applicant's income during the application process.

Households that are categorically eligible have several of the required items in their EAP file. A client's Energy Programs Application (EAP) must be active at the time the weatherization services are provided and at the time of QC inspection.

The Weatherization sub-grantee's staff or its subcontractor are obligated to review and determine WAP eligibility status for anyone requesting an application. Clients may not be denied the right to submit a WAP application by the Weatherization sub-grantee or its subcontractors.

Per 10 CFR 440.22, a unit shall be eligible for Weatherization assistance if it is occupied by a family unit:

- Whose income is at or below 200 percent of the poverty level determined in accordance with criteria established by the Director of Office of Management and Budget. <https://aspe.hhs.gov/poverty-guidelines>
- Which contains a member who has received cash assistance payments during the twelve-month period under Title IV and Title XVI of the Social Security Act.
- Is eligible for assistance under the Low-Income Home Energy Assistance Act of 1981, provided that such basis is at least 200 percent of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget.

At the beginning of each calendar year, newly approved poverty guidelines for the program year are issued. To be consistent with the Energy Assistance Program (EAP) intake, Weatherization and EAP will both update their income eligibility guidelines annually.

Child Support, Foster Care, and Adoption Assistance

Child Support, Foster Care, and Adoption Assistance payments, whether received by the Payee or paid by the Payor, are not considered Sources of Income to be added to the Payee income or deducted from the Payor income for the purposes of determining applicant eligibility.

1. Payee: Where an applicant receives Child Support from any state program or individual during an applicable tax year, such assistance is not considered income for the purposes of determining eligibility (i.e., where an applicant receives Child Support, he or she does not add that amount to his or her calculation of income for purposes of determining eligibility). This is in line with Indiana's EAP income guidelines.

2. Payor: Where an applicant pays Child Support through a state program and/or to an individual, such assistance is not considered a deduction to Income for the purposes of determining eligibility (i.e., where an applicant pays Child Support, he or she may not deduct said assistance from his or her calculation of income for the purposes of determining eligibility). Indiana's EAP income guidelines are not consistent with this guidance. **Income will need to be re-calculated for clients with this scenario.**

Sub-grantee must clearly document which households receive payment for foster care and/or pay or receive child support. These notes and income recalculation documents must be included in the Weatherization client file. If minor errors are found in the EAP file, the Weatherization sub-grantee should notify the EAP Local Service Provider. Major errors or issues should be brought to the attention of IHEDA.

[WPN 19-3](#)

Approach to Determining Eligibility

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If Weatherization work cannot be completed before the application expires a new application is required to be completed. It is considered best practice in this case to complete work before the application expires. Recertification of eligibility must occur every 12 months. If a job is not completed, i.e. it has not passed QC inspection, and the application has expired, and the client is no longer income eligible, contact IHCDA.

RENTAL ELIGIBILITY

Indiana's policy for the weatherization of rental units complies with 10 CFR 440.16(i), and all other pertinent regulations. Sub-grantees must have written permission from the building owner or his agent before commencing and are required to have and abide by their written policies detailing the terms of the landlord/tenant agreement and any landlord contribution policy the sub-grantee has adopted.

Landlord agreement forms must be included in the files of all weatherized rental units. At a minimum, landlord agreements must state that:

- For a one-year period after the weatherization work on the unit is completed, rent cannot be increased, unless the increase is not related to weatherization services performed, as noted in 10 CFR 440.22(b)(3)(ii).
- Landlord and/or other contributions shall be expended in accordance with the agreement between the landlord and the weatherization sub-grantee, as noted in 10 CFR 440.22 (d).
- Written permission of the landlord, or the landlord's agent, must be obtained prior to the weatherization of the unit.

BUILDING ELIGIBILITY AND DOCUMENTATION

Prior to any weatherization activity, a unit must be evaluated to determine whether previous weatherization services have been provided. **Dwelling units weatherized (including dwelling units partially weatherized) with DOE dollars, or under other Federal programs (including LIHEAP) may not receive further financial assistance for weatherization utilizing DOE funds within 15 years of the completion of the previous weatherization. A home utilizing DOE funds may not be re-weatherized within 15 years of any federally funded weatherization services (WAP Memorandum 075).**

Dwelling units that have previously received weatherization may receive non-weatherization assistance and services under other Federal programs, or may receive weatherization assistance from non-Federal sources.

A building may be determined ineligible for weatherization if its structure would prohibit it from ever being weatherized. Any building that *could be* weatherized after health and safety or other repairs must *not* be considered ineligible. To be eligible for weatherization a building must provide complete independent living facilities for one or more persons including permanent provisions for living, sleeping, eating, cooking and sanitation.

If you cannot make a clear determination based on the information provided in this document, please refer to the 2020 Indiana Residential Code and/or contact INCAA Wx training to assist you in your determination. Please include meaningful photographs of the structure and overall property when determination assistance is requested.

Land Contracts - If a land contract is in place, then it must be recorded with the assessor's office to be considered valid. If valid, then the land contract can be treated as if the client has a mortgage on the home. The client would be considered a homeowner.

In the following circumstances, **exceptions** to the required documentation policy will be permitted:

- **Shelters** –a unit or units whose principal purpose is to house on a **temporary** basis individuals who may or may not be related to one another and who are not living in nursing homes, prisons, or similar institutional care facilities.
- An application and eligibility determination is not required for shelters
- Sub-grantees may weatherize shelters. For the purpose of determining how many units exist in a shelter, a grantee may count each 800 square feet of living space within the shelter as a unit or it may count each floor of the shelter as a unit.
- An individual file must be kept for the shelter project. This file must contain:
 - Shelter's mission statement
 - Occupancy type
 - A National Energy Audit Tool (NEAT) or Multi Family tool for Energy Audits (MulTEA)
 - All other applicable documents
- For IWAP reporting purposes, each completion should be counted as "Data Unavailable" when reporting income categories and demographics. The box "Demographics Not Available" must be checked at the bottom of the IWAP application page.
- IHCDA does not require prior approval to weatherize a shelter
- **Multi-family Buildings** – In the weatherization of multi-unit buildings, DOE regulations require that 66% (50% for duplexes and four-unit buildings) of units in the building must be eligible households or will become eligible within 180 days as referenced in 10 CFR 440.22(b).

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Client Eligibility Documentation

IHCDA requires all sub-grantees ensure client eligibility during the period in which services are delivered. Clients which are deemed categorically eligible as a result of their LIHEAP eligibility will have their most recent application date transferred into their IWAP record. Sub-grantees must ensure services are delivered within one year of the most current application date or the client income must be reverified. Files of clients not categorically eligible through EAP must contain a copy of the application and income documentation. Guidelines for household income calculation are found in the most current version of the Indiana Energy Assistance Program Operations Manual <http://www.in.gov/myihcda/eap.htm> or DOE Weatherization Program Notice 19-3.

Households that are categorically eligible have several of the required items in their EAP file. Information, such as income verification, does not need to be duplicated. During monitoring, IHCDA or any contracted monitoring entity reserves the right to inspect the EAP client income verification to ensure client eligibility.

For homes utilizing LIHEAP funds, sub-grantees may provide weatherization services to a dwelling unit previously

A home that is weatherized while being renovated by a state or local government program must have a client file completed within 60 days of the completion of the work. The file must contain all proper verification documents to ensure that the client meets all eligibility criteria.

The following information is taken from Indiana's Weatherization Policy and Procedures Manual detailing the record keeping responsibilities for the sub-grantees:

Client files must be kept in order to verify the work that has been completed and to track expenditures on each unit. Meaningful photographs must also be required in all client files. Sub-grantees are required to report completions and document all funding sources, including non-Federal funding, which were used on a unit. The documentation must detail the dollar amount of DOE and US Department of Health and Human Services (HHS) (LIHEAP) grant funds spent on each unit per measure.

The file must also contain the paperwork necessary to document that proper procedures were followed in the performance of the work. Some forms, such as the application, are required in all client records. Other documents, such as the rental agreement, will only be contained in the files **where applicable**.

A client's **Energy Assistance Program (EAP) application** must be active at the time weatherization services are provided and at the time of QC inspection. An application is considered active for a twelve-month period starting from the date of the initial approved application, when the client income verification was completed. Before work is started, be sure the income verification on the application is within the allowable twelve-month period. If the version in the EAP database is the most current, no paper copy is required. If a client has an expired application in the EAP database and recently reapplied, a current paper copy is required in the client file. A paper copy may be requested by IHCDA program monitors when reviewing client files. Sub-grantees must utilize the most recent or current approved application. For more information, see WPN 20-1. *Appendix A – Indiana Statewide Energy Assistance Application 2019-2020 Fillable*.

Income documentation verifying total household income for the 3 months prior to application should be available. If categorically eligible under EAP, income information does not need to be copied for the weatherization file. For the purposes of monitoring, EAP files must be made available. Sub-grantees must use a form or method of income calculation that is consistent with guidelines as written in the most current version of the Indiana Low Income Energy Assistance Program Operations Manual (<http://www.in.gov/myihcda/eap.htm>). Because files are subject to review, both by state and Federal agencies, it is imperative that case files accurately reflect the computation of household income.

The **Zero Income Affidavit** must be used to verify zero income for **each** household member, age 18 and over, who claim no income for the 3 months prior to the application date. In addition to a completed form, each zero-income claimant must have an attached **wage inquiry or income summary from the local Workforce Development Office**. This is no longer completed during the EAP application process but is a DOE requirement that must be completed by the Weatherization sub-grantee. *Appendix S – Zero Income Affidavit*

According to the U.S. Department of Energy WPN [19-3](#) under Section D Proof of Eligibility #3 Self Certification, zero income claimants must have a *notarized* affidavit claiming zero income for Low Income Weatherization Assistance. IHCDA requires a notarized Zero Income Claimant Form to be in each client's file who claims zero income. All sub-grantees must use this form for all WAP applications. The form must be notarized in compliance with Indiana Code 33-42-2-2, which requires the presence of the claimant when the form is notarized. The form must be signed by the Zero Income Claimant **or** the person who completes the application on behalf of the household. If the signatory is not the zero-income claimant, the person must be listed as a household member on the EAP application.

During the monitoring process, IHCDA reviews at least 10% of Weatherization client files to ensure that sub-grantees are following all DOE and IHCDA requirements regarding client eligibility.

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Describe what household eligibility basis will be used in the Program

A dwelling unit shall be eligible for Weatherization assistance if it is occupied by a family unit that fits the criteria listed below:

Per 10 CFR 440.22, a unit shall be eligible for Weatherization assistance if it is occupied by a family unit:

- Whose income is at or below 200 percent of the poverty level determined in accordance with criteria established by the Director of Office of Management and Budget. <https://aspe.hhs.gov/poverty-guidelines>
- Which contains a member who has received cash assistance payments during the twelve-month period under Title IV and Title XVI of the Social Security Act.
- Is eligible for assistance under the Low-Income Home Energy Assistance Act of 1981, provided that such basis is at least 200 percent of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget.

LIHEAP WX grant clients must adhere to the HHS requirement of 200% of the current OMB poverty income

Denied EAP applications will be referred for eligibility under 10 CFR 440.22 (a) (1) and (2), as noted above. If client is ineligible under the cited regulation, refer to section 103 of Indiana's Weatherization Policy and Procedures Manual for denial procedures and notice to appeal.

At the beginning of each calendar year, newly approved poverty guidelines for the program year are issued. To be consistent with the Energy Assistance Program (EAP) intake, Weatherization and EAP will both update their income eligibility guidelines annually.

Client must adhere to the HHS requirements of **200%** or below of the current OMB poverty guidelines <https://aspe.hhs.gov/poverty-guidelines>

IHCDA requires all sub-grantees ensure client eligibility during the period in which services are delivered. Clients which are deemed eligible as a result of their LIHEAP eligibility will have their most recent application date transferred into their IWAP record. Sub-grantees must ensure services are delivered within one year of the most current application date or the client income must be reverified. Files of clients not categorically eligible through EAP must contain a copy of the application and income documentation. Guidelines for household income calculation are found in the most current version of the [Indiana Energy Assistance Program Operations Manual](http://www.in.gov/myihcda/eap.htm) <http://www.in.gov/myihcda/eap.htm> or DOE Weatherization Program Notice **19-3**.

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

Indiana's Weatherization Assistance Program will follow the same procedures outlined within Indiana's [LIHEAP EAP Program Operations Manual](#). Indiana's approach to ensuring qualified aliens are eligible for weatherization benefits is as follows:

6.5

Eligible household members must be United States (U.S.) citizens, U.S. Nationals or qualified non-US citizens (aliens) as defined by 8 U.S.C §1641(b). Applicants submitting Social Security Cards (SSNs) will not have to submit any other kind of proof of citizenship or qualified non-US Citizen Status. Persons who are not citizens or qualified non-US citizens are considered to be ineligible household members. Ineligible household members living with eligible household members do not disqualify the family from receiving assistance.

Households with Ineligible Applicants

LSPs should not deter or deny applicants from applying for assistance if they are ineligible or if they reside with ineligible individuals. An applicant must only be eighteen (18) to apply. Accordingly, an applicant can be either an eligible applicant (able to receive EAP benefits) or an ineligible applicant (unable to receive EAP benefits but applying for the eligible members).

In order to calculate the household's eligibility, an LSP should exclude the ineligible household members from the total number of household members (total

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household size) when calculating the benefit amount. However, the income of the ineligible household member should be counted when determining the total household income eligibility. Income of all household members regardless of eligibility must be documented.

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 have been provided. **Dwelling units weatherized (including dwelling units partially weatherized) with DOE dollars, or under other Federal programs (including LIHEAP) may not receive further financial assistance for weatherization utilizing DOE funds within 15 years of the completion of the previous weatherization. A home utilizing DOE funds may not be re-weatherized within 15 years of any federally funded weatherization services ([WAP Memorandum 075](#)).**

Dwelling units that have previously received weatherization may receive non-weatherization assistance and services under other Federal programs, or may receive weatherization assistance from non-Federal sources.

For LIHEAP funded weatherization, a unit may be re-weatherized five years after the end of the grant performance period utilized on the unit.

A building may be determined ineligible for weatherization if its structure would prohibit it from ever being weatherized. Any building that *could be* weatherized after health and safety or other repairs must *not* be considered ineligible. To be eligible for weatherization a building must provide complete independent living facilities for one or more persons including permanent provisions for living, sleeping, eating, cooking and sanitation.

If you cannot make a clear determination based on the information provided in this document, please refer to the 2020 Indiana Residential Code and/or contact INCAA Wx training to assist you in your determination. Please include meaningful photographs of the structure and overall property when determination assistance is requested.

IHCDA requires all sub-grantees ensure client eligibility during the period in which services are delivered. Clients which are deemed eligible as a result of their LIHEAP eligibility will have their most recent application date transferred into their IWAP record. Sub-grantees must ensure services are delivered within one year of the most current application date or the client income must be reverified. Files of clients not categorically eligible through EAP must contain a copy of the application and income documentation. Guidelines for household income calculation are found in the most current version of the [Indiana Energy Assistance Program Operations Manual](#) <http://www.in.gov/myihcda/eap.htm> or DOE Weatherization Program Notice [19-3](#).

Households that are categorically eligible have several of the required items in their EAP file. Information, such as income verification, does not need to be duplicated. During monitoring, IHCDA or any contracted monitoring entity reserves the right to inspect the EAP client income verification to ensure client eligibility.

Land Contracts - If a land contract is in place, then it must be recorded with the assessor's office to be considered valid. If valid, then the land contract can be treated as if the client has a mortgage on the home. The client would be considered a homeowner.

In the following circumstances, **exceptions** to the required documentation policy will be permitted:

- **Shelters** –a unit or units whose principal purpose is to house on a **temporary** basis individuals who may or may not be related to one another and who are not living in nursing homes, prisons, or similar institutional care facilities.
- An application and eligibility determination is not required for shelters
- Sub-grantees may weatherize shelters. For the purpose of determining how many units exist in a shelter, a grantee may count each 800 square feet of living space within the shelter as a unit or it may count each floor of the shelter as a unit.
- An individual file must be kept for the shelter project. This file must contain:
 - Shelter's mission statement
 - Occupancy type
 - A National Energy Audit Tool (NEAT) or Multi Family tool for Energy Audits (MulTEA)
 - All other applicable documents
- For IWAP reporting purposes, each completion should be counted as "Data Unavailable" when reporting income categories and demographics. The box "Demographics Not Available" must be checked at the bottom of the IWAP application page.
- IHCDA does not require prior approval to weatherize a shelter

- **Multi-family Buildings** – In the weatherization of multi-unit buildings, DOE regulations require that 66% (50% for duplexes and four-unit buildings) of units in the building must be eligible households or will become eligible within 180 days as referenced in 10 CFR 440.22(b).
 - For more information pertaining to weatherizing multi-family buildings refer to the Multi-family section.

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When determining if a household is eligible for the State EAP benefit, the household must provide proof of homeownership. This documentation must confirm that an individual in the household is listed as the owner of the property. Proof of Homeownership may include:

- * Beacon or County Assessors websites
- * Current Property taxes (Spring and/or Fall)
- * Current mortgage statement
- * Current homeowner Insurance
- * Deed

Indiana's policy for the weatherization of rental units complies with 10CFR440.16(i), and all other pertinent regulations. Sub-grantees must have written permission of the building owner or his agent before commencing, and are required to have and abide by their written policies detailing the terms of the landlord/tenant agreement and any landlord contribution policy the sub-grantee has adopted.

Landlord agreement forms must be included in the files of all weatherized rental units. At a minimum, landlord agreements must state that:

- For a one-year period after the weatherization work on the unit is completed, rent cannot be increased, unless the increase is not related to weatherization services performed, as noted in 10CFR440.22(b)(3)(ii).
- Landlord and/or other contributions shall be expended in accordance with the agreement between the landlord and the weatherization sub-grantee, as noted in 10CFR440.22 (d).
- Written permission of the landlord, or the landlord's agent, must be obtained prior to the weatherization of the dwelling.

Prior to any weatherization activity, a unit must be evaluated to determine whether previous weatherization services have been provided. **Dwelling units weatherized (including dwelling units partially weatherized) with DOE dollars, or under other Federal programs (including LIHEAP) may not receive further financial assistance for weatherization utilizing DOE funds within 15 years of the completion of the previous weatherization. A home utilizing DOE funds may not be re-weatherized within 15 years of any federally funded weatherization services ([WAP Memorandum 075](#)).**

Dwelling units that have previously received weatherization may receive non-weatherization assistance and services under other Federal programs, or may receive weatherization assistance from non-Federal sources.

The following actions must be taken on each DOE unit prior to weatherization services to ensure that homes that have received weatherization services **within 15 years** are not re-weatherized:

- Each client's address must be entered into IWAP to identify whether the home has been weatherized during or after 2000 (length of IWAP historical records);
- Each client must be asked whether their home has been weatherized **withing 15 years**; and
- A visual inspection of each home must be performed by an energy auditor to identify if previous weatherization measures have been performed.

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.

If any of the above actions indicate or suspect that weatherization services have previously been rendered in a unit, the sub-grantee must check with the local agency that has historically provided weatherization services in the area to inquire about any records pertaining to the address.

Sub-grantees may choose to develop a Weatherization application to collect information from potential clients that do not wish to apply for the EAP program, or to collect additional information that the EAP application does not gather. The use of such an application is not required, and any Weatherization application would use the same income eligibility determination as the EAP program.

Describe Reweatherization compliance

IHCDA addresses reweatherization of homes for DOE and LIHEAP in the following manner:

DOE: Prior to any weatherization activity, a unit must be evaluated to determine whether previous weatherization services have been provided. **Dwelling units weatherized (including dwelling units partially weatherized) with DOE dollars, or under other Federal programs (including LIHEAP) may not receive further**

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financial assistance for weatherization utilizing DOE funds within 15 years of the completion of the previous weatherization. A home utilizing DOE funds may not be re-weatherized within 15 years of any federally funded weatherization services ([WAP Memorandum 075](#)).

Dwelling units that have previously received weatherization may receive non-weatherization assistance and services under other Federal programs, or may receive weatherization assistance from non-Federal sources.

The following actions must be taken on each DOE unit prior to weatherization services to ensure that homes that have received weatherization services within 15 years are not re-weatherized:

- Each client's address must be entered into IWAP to identify whether the home has been weatherized during or after 2000 (length of IWAP historical records);
- Each client must be asked whether their home has been weatherized within 15 years; and
- A visual inspection of each home must be performed by an energy auditor to identify if previous weatherization measures have been performed.

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.

If any of the above actions indicate or suspect that weatherization services have previously been rendered in a unit, the sub-grantee must check with the local agency that has historically provided weatherization services in the area to inquire about any records pertaining to the address.

LIHEAP: Prior to any weatherization activity, a unit must be evaluated to determine whether previous weatherization services have been provided. For units utilizing LIHEAP funds, sub-grantees may provide weatherization services to a unit previously weatherized provided that it was at least **5 years** prior to the beginning of the current LIHEAP program year. (Example: Current LIHEAP grant year started 10/1/18; 5 years prior to this date is 10/1/14 – the unit would have to have received weatherization services through LIHEAP prior to 10/1/14 to be eligible for Weatherization services utilizing LIHEAP current year funds.)

The following actions must be taken on each LIHEAP unit prior to weatherization services to ensure that units that have not received weatherization services within the last five years as outlined above:

- Each client's address must be entered into IWAP to identify whether the client's unit has been previously weatherized and determine what the date is;
- Each client must be asked whether their unit has been weatherized previously and when the weatherization took place;
- A visual inspection of each unit must be performed by an auditor to identify whether previous weatherization measures have been performed.

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.

If any of the above actions indicate or suspect that weatherization services have previously been rendered in a unit, the sub-grantee must check with the local agency that has historically provided weatherization services in the area to inquire about any records pertaining to the address.

A "rework" is different from a "re-weatherized unit" and is defined in the Rework Section of this manual.

The above information is located in Indiana's Weatherization Policy and Procedures Manual, Section 4.2.

Describe what structures are eligible for weatherization

Indiana's sub-grantees may weatherize single site built homes, mobile homes (manufactured housing), shelters and multi-unit dwellings. Indiana's sub-grantees may also Weatherize dwellings for both homeowners and renters. The selection process is based upon client eligibility, established priority guidelines, and information gathered during the initial audit.

Once a dwelling is determined to qualify for services, it is up to the Energy Auditor to determine if the dwelling is a candidate to receive weatherization services or if the dwelling should be deferred.

IHCDA holds a programmatic agreement with the Indiana State Historic Preservation Office Regarding EECBG, SEP & WAP undertakings. The original agreement was signed June 2012 but pursuant Fed. Reg. Vo. 78, No. 50 dated March 14, 2013 the agreement was extended through Dec 31, 2030, but IHCDA is waiting for final documentation from the Historic Preservation department of DOE. The agreement and extension notification can be found as an attachment to the SF424.

Please reference V.3 Priorities, Deferral Process, Rental/Multi Family, Audit Procedures and Client Eligibility descriptions within this Master Plan.

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Describe how Rental Units/Multifamily Buildings will be addressed

Multi-Unit Buildings –

The following multi-family policy applies to both DOE and LIHEAP funded weatherization buildings containing five (5) or more units. All multi-family buildings containing five (5) or more units require IHCDA approval. Multi-family buildings less than five (5) units do not require prior IHCDA approval and are not subject to this policy.

Sub-grantees or their contractors are responsible for performing an audit using the multi-family tool MulTEA for buildings containing five (5) or more units. Sub-grantees must contact IHCDA to request access to MulTEA. A NEAT or MulTEA audit must be performed on buildings containing less than five (5) units that are individually heated or cooled. Sub-grantees are responsible for all costs associated with performing this audit.

If the sub-grantee is proposing to weatherize a HUD building, the sub-grantee must refer to [WPN 17-4](#).

Things to Consider Before Starting a Multi-family Project

- Sub-grantee capacity
- Contractor capacity and availability
 - If you only have one contractor available for certain measure, that would be a risk that needs to be considered
- Fiscal capacity of contractor and sub-grantee (all expenses must be fronted)
 - Sub-grantees may run into challenges regarding payment when dealing with contractors. For larger jobs, the contractor would have a lot of work in flux without being able to receive payment until inspections. IHCDA recommends that inspections be staggered so that contractors can submit invoices periodically.
- Adequate grant allocation
- Time of year that work is going to be conducted, particularly regarding when heating or cooling might need to be shut off.
- The property owner must consent to the project and the sub-grantee must have a signed Owner Agreement before any work can begin.

Entities Eligible to Conduct Multi-Family Projects

Agencies on a Quality Improvement Plan (QIP), Modified Quality Improvement Plan (MQIP), or are considered high-risk, as determined by IHCDA, are not eligible to complete multi-family projects.

Certification and Training Requirements

A Building Performance Institute (BPI) Multi-family Building Analyst certification is required for all buildings containing five (5) or more units.

Buildings containing five (5) or more units must always be inspected by an individual who has successfully completed an approved Multi-family Quality Control Inspector (QCI) training course.

Contact INCAA for training updates related to this requirement.

Source: [WPN 15-4](#)

Building Eligibility

66% of units in a multi-family building are required to be income eligible ([10 CFR 440.22b2](#)).

Requirements per Number of Units

Number

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Number of Units	10 CFR 440.22(b)(2) Percent of Required Eligible Clients	State Plan WPN 16-5 FAQ	Heating WPN 19-4 & WPN 16-4 FAQ	WPN 19-4 Audit Runs	WPN 16-6 FAQ Units That Need an Audit	Indiana Auditor Requirement	of Units that Require Quality Control Inspection - WPN 15-4 and 10CFR 440.21
2-4	50%	Pre-Approved by IHCDA	Separate per unit Separate per unit	NEAT MulTEA	All	IN or BPI	All
5 -10	66%	IHCDA's Approval required	Separate per unit with IHCDA approval	MulTEA	All	IN or BPI	All*
11-24			Separate per unit with IHCDA approval	MulTEA	All	Multi-BPI	
25+	66%	DOE Approval Required	Separate per unit	MulTEA	All	Multi-BPI	All*

* WPN 15-4 QCIs working in multifamily buildings attend, and receive a successful evaluation from a training program delivering a curriculum based on the NREL Multifamily Quality Control Inspector JTA.

Note: All common areas of the building within the thermal envelop must receive weatherization and be inspected for health and safety.

Mandatory Reading Requirements

All Executive Directors, Fiscal Directors, Weatherization Managers, Energy Auditors, and QCIs are required to read the following documents and complete the Multi-family Required Readings Form, MF Attachment 3.

- [WPN 15-4](#) Quality Work Plan Requirement Update
- [WPN 16-5](#) Multi-family Weatherization
- [WPN 16-5 FAQs](#) Multi-family Weatherization Frequently Asked Questions
- [WAP Memorandum 035](#) Weatherization Leveraging
- [WPN 16-6](#) Weatherization of Rental Units - Applicable to Single Family and Multi-family Dwelling
- [WPN 16-6 FAQs](#) Weatherization of Rental Units Frequently Asked Questions
- [WPN 17-4](#) Multi-family Housing - Procedure for Certifying Income Eligible HUD Assisted Buildings
- [WPN 18-1](#) Program Year 2018 Weatherization Grant Guidance: Sections 2.6 and 2.7
- [WPN 19-4](#) Revised Energy Audit Approval Procedures, Related Audit, and Material Approvals
- [Weatherization Program and Policies Manual](#) Section 102 - Multi-Unit Buildings

Project Plan

All sub-grantees are required to submit a detailed project plan including a timeline of activities to IHCDA prior to commencing a multi-family project. This shall be submitted as part of the Multi-family Project Development Form, MF Attachment 1.

Please note, sub-grantees are not allowed to begin a multi-family project after the beginning of the last quarter of the grant's program year. For example, all DOE funded multi-family projects must be started *no later than* January 1st unless pre-approved by IHCDA. All work shall be completed by February 1st including QCI inspections to allow enough time for any necessary reworks. All requests for exceptions shall be sent to IWX@ihcda.in.gov. IHCDA's Director of Community Programs will make the final determination regarding exceptions.

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Quality Control Plan

Prior to any work being done, the sub-grantee must have a written Quality Control (QC) Plan approved by IHCDA. Quality Control shall be enforced through the entire course of the multi-family project. The minimum requirements for the QC Plan are:

- Sub-grantee quality assurance file review process
- QCI in-progress site visit schedule
- QCI onsite meeting schedule with contractors, tenants, landlords, maintenance personnel, engineering firms, etc.

Mandatory Pre-Consultation

Sub-grantees considering a multi-family project containing five (5) or more total units, or *any* number of units that share a central heating system, must set up a pre-consultation with IHCDA. To do so, please email IWX@IHCDA.in.gov. IHCDA requires the Multi-family Project Development Form (MF Attachment 1) be submitted to IHCDA prior to the pre-consultation meeting.

Progress Updates

All sub-grantees working on a multi-family project(s) are required to provide IHCDA with written updates at a frequency determined by IHCDA. The sub-grantee must also provide IHCDA with a written update when each benchmark in the proposed timeline has been met. The email update should be sent to the Weatherization Team at IWX@ihcda.in.gov.

Audit Requirements

All units in 2 to 4-unit buildings must be assessed. In buildings with five (5) or more units at least 10% of all units in the building, with no fewer than three (3) units of each floor plan, and not fewer than five (5) units total, must be visited for a complete energy audit during the pre-weatherization building assessment. In addition, at some point during each project, all units must have a documented inspection for possible health and safety concerns, including diagnostics if appropriate, followed by work orders for correction ([WPN 16-5 FAQs](#)).

NOTE: ALL units with a combustion appliance present must receive pre- and post- health and safety diagnostics testing ([WPN 16-5 FAQs](#)).

Blower door testing is required on at least 15% of units of each floor plan or five (5) units of each floor plan, whichever is greater. A minimum of five (5) units must be visited during the audit. Health and safety testing is required in all units and all common areas ([WPN 16-5 FAQs](#)).

The Multi-family Building Analyst and Multi-family trained QCI cannot be the same individual.

Client File Documentation

The WAP file for each building must contain at least the following information from the energy audit:

- The recommended statement of work including the savings-to-investment ratios (SIRs) of each measure and the total project SIR:
 - If any measures were bought down the documentation must show the pre-bought down SIRs of each individual measure and the pre-bought down project SIR;
 - Documentation must include the other sources that funded each bought-down measure;
- Either a printed file showing all of the building audit inputs and outputs or the immediately accessible electronic file that shows all of the audit inputs and outputs;
- Final installed costs of each measure and the total project cost. If the project went through the bidding process all bids must be in the file;
- All specifications defining each measure.

Source: [WPN 16-5](#)

All other standard Weatherization client file documentation, as applicable, is required.

Following multi-family forms are required and must be submitted to IHCDA. Incomplete submissions will be returned to the sub-grantee.

Document Name:	Required by:
Multi-family Project Development Form (MF Attachment 1)	Before Pre-consult
Multi-family Required Readings Form (MF Attachment 3)	Before Pre-consult
Historic Preservation Form/Documentation	Before Pre-consult

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Buy-Down Agreement and/or Landlord Participation Agreement	Before Pre-consult
Multi-family Building Owner Agreement Form (MF Attachment 2)	Before Building Diagnostic Audit
Income Eligibility Documents	Before Building Diagnostic Audit
Demographics of Residents	Before Building Diagnostic Audit
Accrual of Benefits to Tenants	Before Building Diagnostic Audit
Audit Runs	After Building Diagnostic Audit
Multi-family Contractor Information Form (MF Attachment 4)	After Building Diagnostic Audit
Quality Control Plan	After Building Diagnostic Audit

Buy Downs

Upon agreement between the sub-grantee and building owner, building owners may buy down measures typically prioritized as needs, such as furnace or boiler replacements, that do save energy but don't achieve an SIR of 1 or greater as a stand-alone measure. A measure can be bought down only when the overall SIR of the package of measures, including the full cost of the measure that will be bought down, is 1.0 or greater ([WPN 16-5](#)).

For example, in the first case below the replacement windows would be eligible for a buy-down in WAP; the replacement windows with a full-cost measure SIR = 0.8 could be bought down so the after-buy-down DOE *measure* cost would have an SIR of at least 1.0 (and of course the post-buy-down DOE package SIR would increase).

In the second case the replacement windows would not be eligible for a buy-down in WAP because the pre-buy-down *package* SIR is below 1.0.

From WPN 16-5

Please consult with IHCDCA before buying down measures. For more information regarding buying down measures, see [WPN 16-5](#).

Owner Contribution/Landlord Participation

Every sub-grantee is required to have an Owner Contribution/Landlord Participation policy in place. Prior to commencing a multi-family project, the sub-grantee must also have a multi-family specific Owner Contribution/Landlord Participation policy in place. IHCDCA has provided an optional Multi-family Owner Contribution Form as part of the Multi-family Project Development Form (MF Attachment 1) for sub-grantee convenience.

Owner Contribution/Landlord Participation are separate from the monies used to buy down measures. If the owner is required to contribute and is not willing, the project cannot move forward.

Source: [WPN 16-5](#)

Utilities Included in Rent

When performing Weatherization services of any rental property, including multi-family, when tenants do not directly pay for their own utilities, i.e. utilities included in rent, the sub-grantee administering the program must demonstrate the benefits to the low-income tenants (10 CFR 440.22(b)(3)(i)). Sub-grantees must have a policy or procedure in place to property document this. For examples, see [WPN 16-5](#) table 2, Accrual of Benefits.

Monitoring

All multi-family projects will be monitored; a minimum of 10% of units will be monitored.

Sub-grantees should follow WPN 16-5 for guidance and utilize INCAA and IHCDCA for technical support. More information for weatherizing multi-family dwelling is located within DOE regulations on WAPTAC, in 10 CFR 440 (Federal Regulations) and Weatherization Program Notice (WPN) 16-5.

Shelters

- Shelters –a unit or units whose principal purpose is to house on a **temporary** basis individuals who may or may not be related to one another and who are not living in nursing homes, prisons, or similar institutional care facilities.
- An application and eligibility determination is not required for shelters
- Sub-grantees may weatherize shelters. For the purpose of determining how many units exist in a shelter, a grantee may count each 800 square feet of living space within the shelter as a unit or it may count each floor of the shelter as a unit.
- An individual file must be kept for the shelter project. This file must contain:
 - Shelter's mission statement

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- Occupancy type
- A National Energy Audit Tool (NEAT) or Multi Family tool for Energy Audits (MulTEA)
- All other applicable documents
- For IWAP reporting purposes, each completion should be counted as “Data Unavailable” when reporting income categories and demographics. The box “Demographics Not Available” must be checked at the bottom of the IWAP application page.
- IHEDA does not require prior approval to weatherize a shelter

Rental Procedures

The benefits of weatherization to occupants of rental units are the same as home owners per 10 CFR 440.22(b)(3). 10 CFR 440.3 defines a rental unit as a unit occupied by a person who pays rent for the use of the unit.

Sub-grantees must have the following policy and procedures in place before proceeding with weatherization of a rental unit:

- Written permission from the building owner or his/her legal managing agent before commencing;
- Benefits of the services accrue primarily to the low income tenants residing in such units;
- For 12 months after completion, a landlord must agree the household will not be subject to a rent increase due to weatherization;
- No undue or excessive enhancements shall occur to the value of the unit;
- A landlord agreement/affidavit as required by the sub-grantee;
- Documentation supporting monthly rental amount, such as being included in the Landlord agreement, a recent cancelled check made payable to the landlord or the amount included on the landlord affidavit

Sub-grantees are required to have and abide by their written policies detailing the terms of the landlord/tenant agreement and any landlord contribution policy the sub-grantee has adopted.

Landlords may be required to contribute financially toward the cost of completing a unit, and/or to complete specific work on the unit. In cases where the landlord meets the definition of low income and is eligible for services, the sub-grantee cannot require financial participation on the part of the landlord. Sub-grantees will ensure that clients realize the benefits from the weatherization work. Sub-grantees may also include in their landlord policy a provision that does not require a landlord contribution if the landlord is a 501(c)3 non-profit organization.

Landlord agreement forms must be included in the files of all weatherized rental units. At a minimum, landlord agreements must state that:

- For a one-year period after weatherization work on the unit is completed, rent cannot be increased, unless the increase is not related to weatherization services performed, as noted in 10CFR440.22(b)(3)(ii).
- Landlord and/or other contributions shall be expended in accordance with the agreement between the landlord and the weatherization sub-grantee, as noted in 10CFR440.22 (d).
- Written permission from the owner, or his/her legal agent,

Landlord contributions are not to be counted as program income and must be applied to the weatherized unit.

Agencies that require landlord contributions must use a net system when charging weatherization. As an example, if the cost of the work is \$4,000.00, and the landlord contributes 50%, or \$2,000.00, weatherization may be charged for only the remaining \$2,000.00.

Sub-grantees are required to develop a written appeals process for dealing with rental units. The process must include a method by which tenants may file complaints and owners in response to such complaints, must demonstrate that the rent increase concerned is related to matters other than the weatherization work.

The primary purpose of the weatherization program is to lower the total residential energy expenditures of low-income persons. Sub-grantees are to ensure that no undue enhancement shall occur to increase the value of the units, as noted in 10CFR440.22 (b)(3)(iv). Undue enhancement is defined by DOE as any improvement to the property that goes beyond the scope of energy conservation work.

Sub-grantees are not required to place liens on rental property that has been weatherized but must ensure protection of the low-income household from improper eviction or sale of property. Sub-grantees must be aware of the legal protection available and be prepared to make appropriate referrals when necessary.

Procedure for Certifying Income-Eligible HUD Assisted Buildings

Prior to 2017, HUD provided lists of HUD Multi-family Property Listings Eligible for Weatherization Assistance to DOE for posting on DOE's website; however, the previously-published lists of eligible buildings expired on December 31st, 2016. New building lists will be provided by HUD using the new procedure outlined in this guidance.

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HUD has developed an income certification process for individual properties that relies on certified annual income records and building information maintained by the property owner pursuant to Federal requirements. This process has been determined to comply with the requirements of the January 25th, 2010 rule. Owners or managers of HUD Qualified Assisted Buildings seeking WAP funds may continue to use this Property Certification Procedure for individual properties, as outlined below.

Following [WPN 17-4](#), to ensure that a multifamily building meets the income eligibility requirements set by DOE pursuant to the certification process established by HUD, property owners and managers shall submit two documents to HUD: 1) a **Property Self-Certification** form that specifies that the building in question meets DOE's income eligibility requirements and, 2) a **Property Occupancy Report** from current property records that confirm compliance with DOE's income eligibility requirements.

I. Property Certification

The property owner or authorized agent of the property must sign a Self-Certification form attesting that:

1. The property owner or authorized agent maintains certified income records for households residing at the property.
2. The property owner or authorized agent has reviewed its current certified income records.
3. The property owner or authorized agent has determined that at least 66 percent of the units in each building (or at least 50 percent of the units for 2- and 4-unit buildings) have certified incomes that are at or below 200 percent of the current federal poverty level based on household size.
4. The property owner or authorized agent certifies that all the information provided with the certification request is true and accurate.

A multifamily property certification form is attached for use by property owners or authorized agents.

II. Property Occupancy Report

The property owner or authorized agent must also complete and submit an Occupancy Report for the property.

A **Multifamily Occupancy Report** worksheet file is attached for completion by property owners or authorized agents. The file contains a **Property Information** worksheet and **Building-Unit** worksheets that must be completed for each building. The income information requested should be available from standard occupancy reports prepared for the property.

Required property information includes: property name, HUD contract number, contract expiration date, other property identification number (if applicable), property address and the number of buildings and units that are at the property and that meet DOE's income requirements.

Required building-unit information includes a listing of all units and information for each units including: building identification, building address, certified annual income, household size, and whether the household income was certified in the last year.

Upon completion of the **Property Certification** and the **Multifamily Occupancy Report**, the property owner (or property owner's representative) will submit both files to HUD at energyaction@hud.gov and to DOE at Derek.Schroeder@ee.doe.gov.

III. HUD Review

1. HUD will review the certification and accompanying documentation for completeness. If the documentation submitted by the property owner is insufficient for HUD to complete its review, HUD will notify the property owner via e-mail that the request cannot be approved based on the information submitted.
2. HUD will review the household and property information provided under the self-certification process with records maintained by HUD, and may request additional occupancy information subject to Federal requirements.
3. If the documentation is complete and one or more of the buildings at the property meet DOE's income eligibility requirements, HUD will designate the property or list of qualified buildings as income qualified properties/buildings, and will notify Derek Schroeder at DOE and the building owner.
4. HUD will at the same time provide DOE with a list of the income-certified buildings pursuant to the above procedures; DOE will post these lists on its web site as required by 10 CFR 440.22 (b)(1), 440.22 (b)(2), and 440.22(b)(3).
5. Buildings determined by HUD to be eligible for WAP assistance will be posted on one of two lists:
 - a. List 1 – Public housing buildings or privately-owned buildings with three or more years remaining on their affordability contracts with HUD are included on this list. As outlined in the January 2010 Final Rule, inclusion on List 1 demonstrates compliance with the following three WAP multifamily program requirements: (1) DOE's income requirements; (2) protection against rent increases; and (3) protection against undue enhancement of the weatherized building.
 - b. List 2 – Buildings on this list have less than three years remaining on their Housing Assistance Payments (HAP) contract with HUD. As outlined in the January 2010 Final Rule, inclusion on List 2 demonstrates compliance with only the following two multifamily program requirements: (1) DOE's income requirements; and (2) protection against undue enhancement of the weatherized building. Buildings on this list must separately comply with the WAP program requirement for protection against rent increases.

U.S. Department of Agriculture (USDA) and Low Income Housing Tax Credit (LIHTC) Properties

The certification procedures outlined in this Guidance do not apply to LIHTC properties, or for properties with USDA guaranteed loans. The LIHTC and USDA lists of income-eligible properties are no longer valid and will no longer be updated; WAP providers should follow standard procedures for verifying individual resident incomes for USDA and LIHTC properties.

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Describe the deferral Process

Although a client may meet eligibility requirements for weatherization, the sub-grantee may defer the unit for weatherization services as a result of the home not being suitable for weatherization services. A deferral may occur due to problems that are beyond the scope of weatherization such as condition of the structure, area is slated for redevelopment or health and safety reasons.

Deferrals can take place during any phase of the weatherization process. This includes, but is not limited to the following:

- Pre-audit inspection
- During the energy audit
- During HVAC work
- During SHELL work
- During the quality control inspection
- Any other time during the course of Weatherization

A pre-audit inspector, energy auditor, HVAC professional, Crew Leader, Quality Control Inspector have the authority to initiate the deferral process. All deferral initiations must be reported to the Program Manager. Any time a home visit is conducted that results in a deferral, a formal written deferral letter, as described below, must be submitted to the client.

All Weatherization work must be postponed until the deferral issues have been remedied by the client and/or by an alternate funding source. Below is a non-comprehensive list of possible justification for deferral:

- Client refuses a Health and Safety Measure
- Client refuses a Major Measure, as described in Attachment 8 of [WPN 19-4](#)

- Client or client family/friends in the home are uncooperative, abusive, threatening, engaged in illegal activities
- Signs of illegal activities in the home, i.e., hypodermic needles, drug paraphernalia, unsecured firearms and/or weapons, etc.
- Moisture issues
- Raw sewage or other sanitary issues
- Pests, insects, vermin, and/or rodents
- Unit is for sale, foreclosed, and/or owner will not be residing in the home throughout the weatherization process
- Applicant is deceased
- Lead based paint conditions that could endanger the health of the occupants or workers
- Unit has been condemned
- Unit has structures issues that could endanger the occupants or workers
- Unit is under construction or being remodeled
- Application parameters do not reflect current household
- All other conditions that could endanger or compromise the well-being of the occupants and/or Weatherization professionals

At any point when a unit is deferred, the client must be provided with written notification of the deferral. The written notice must be in compliance with WPN 17-7 and IHCD State Plan. A copy of the written notification of deferral to the client must be placed in the client file. The client must also be given a copy of the signed and dated Moisture Assessment form. A copy of this form must also be in the client file. For each deferral issue within the home, there must be a meaningful corresponding photograph of the issue(s) in the client file. The deferral notification to the client must include the instructions for pursuing an appeal to the deferral. This appeal must follow established protocol outlined in the Appeals Procedure section of this manual.

The deferral notification must be sent to the client in writing and must include the following:

- A signed Moisture and Home Assessment Form
- Reason(s) for deferral
- Actions and timeline required by client to receive Weatherization services
- Appeal process

When a deferral occurs once the weatherization process has commenced, all work is required to be completed and pass a QC inspection by a QCI within 12 months of the application date in order to be counted as a completion. If this is not possible, the sub-grantee must submit the following documentation to IHCD with the following information for a Provisional Closeout, which may be approved by IHCD, but will not count as a completion:

- Meaningful photographs of the cause(s) for deferral

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- Moisture Assessment Form
- Documentation of client education as required per [WPN 17-7](#)
- Client Health Screening, when applicable
- Concise timeline beginning with approved application date, date of pre-audit (when applicable) date of audit, date of HVAC, date of SHELL, date all deferrals
- Justification stating the reason work could not be completed in a timely manner
- All other documentation as requested by IHCDCA

The cost associated with deferred units are an allowable charge under Base Program Operations. Sub-grantees must document on the deferred invoice that the charge was for a deferred home and it not attributed to any particular completion. All costs must be reported in IWAP

All agencies will pursue alternative funding resources to reduce the occurrence of deferral. Agencies should establish lines of communication with other funding sources so that referrals can occur in an efficient manner. The following is a list of potential funding sources to help remedy situations in a home:

- U.S. Department of Housing and Urban Development (HUD) - HOME Program
- HUD - Community Development Block Grant
- U.S. Department of Health and Human Services - Community Services Block Grant
- U.S. Department of Agriculture - Rural Economic Community Development
- State-funded housing and rehabilitation programs
- Low-income program funds provided by local utilities
- City-funded housing and rehabilitation programs
- Donations or financial participation from landlords
- Donations from local churches or community groups
- State Deferral funds as outlined in the Deferral Program section of this manual

In addition to the possibilities mentioned above, IHCDCA has made available State LIHEAP funds to be used to address deferral issues to move homes from deferral to weatherization ready. The guidelines for these funds are contained in Section 10 of IHCDCA's Weatherization Policy and Procedures Manual. Section 10 is attached to the SF-424.

All clients who are deferred must receive a letter outlining the reason(s) for the deferral.

A copy of the deferral letter must be placed in the client file. The deferral letter must be specific as to the reason(s) for the deferral, outline next steps for the client, and provide a timeline for action.

Indiana's Weatherization Policy and Procedures Manual outlines the client appeal process as follows:

Appeals Procedure

When a Weatherization sub-grantee determines that a household is ineligible, the sub-grantee, within ten (10) working days, must provide a written denial to the client detailing the reason(s) for the denial and advising them of their right to appeal the decision. Weatherization sub-grantees must retain in the client file a copy of the denial letter with the appeal procedure that was sent to the client.

Pictures must be taken to document the conditions leading to deferral and must be placed in the client file.

IHCDCA strongly recommends that the **Applicant Notification Form** found in *Appendix R* be the basis of any form created by the Weatherization sub-grantee to notify weatherization clients of their denial of services.

Applicants may appeal a denial. Allowing a client to appeal a sub-grantee's decision is mandatory for the Weatherization Assistance Program. The appeals procedure must be communicated to households whose assistance has been denied. When the sub-grantee provides written notification of denial to an applicant, the notification must include the household's right to appeal that determination.

The "right to appeal" information provided to any denied household must contain the following two processes:

1. **Local Review:**

The client must send their written appeal to the local sub-grantees Weatherization Manager or Executive Director within thirty (30) calendar days of receipt of the denial. The sub-grantees Executive Director or Weatherization Manager determines the applicant's eligibility on review within ten (10) business days of receipt of the applicant's written appeal. All appeal documentation must be saved in the client file and IHCDCA's Community Programs Manager - Weatherization must be notified of denied appeals. The final determination for the appeal must be sent to the client in writing by the sub-grantee's Executive Director.

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2. State Review:

If the client is not satisfied with the sub-grantee's determination, they may request formal review by the State, but it must be submitted in writing. This request is made by submitting the appeal to IHCDA's Director of Community Programs. The sub-grantee may submit this appeal on behalf of the client or the client may submit it directly to IHCDA. This request for formal review must be made within thirty (30) calendar days of receipt of the sub-grantee's appeal determination.

The appeal must include the stated reasons for the Client's objection to the decision, reasons must be based solely upon evidence supporting one (1) of the following circumstances:

- Clear and substantial error or misstated facts which were relied on in making the decision being challenged/appealed;
- Unfair competition or conflict of interest in the decision-making process;
- An illegal, unethical or improper act; or
- Other legal basis that may substantially alter the decision.

The appeal must be made in writing and received by the Indiana Housing and Community Development Authority (IHCDA) within thirty (30) days of receipt of the sub-grantee's final decision. The appeal is to be sent to the IHCDA's Director of Community Programs who, will make the final determination.

The client will receive written acknowledgement of receipt of the appeal by the Director of Community Programs within five (5) business days, noting the day the appeal was received. All pertinent material from the case will be requested from the Weatherization sub-grantee by IHCDA in order to make a determination. The applicant, as deemed appropriate, shall have the opportunity to review all documentation submitted to IHCDA.

The Director of Community Programs will have thirty (30) days from IHCDA's receipt of the written request for appeal to review the file and make a determination. The decision of the Director of Community Programs is final.

This appeals policy also applies to clients who may be dissatisfied with the weatherization work after it occurs, within the one-year warranty period. The client must send their written appeal to the local sub-grantees Weatherization Manager or Executive Director within thirty (30) calendar days of receipt of the denial. The sub-grantee must then follow the right to appeal process detailed above.

The costs associated with deferred audits are an allowable charge under Base Program Operations. Those agencies using contractors must be able to document on the deferral invoice that the charge was for a deferred home and is not attributable to any particular completion. Pictures documenting the conditions leading to deferral must be placed in the client file.

When possible, IHCDA monitoring staff reviews at least two deferred client files during monitoring.

V.1.3 Definition of Children

Definition of children (below age): **18**

V.1.4 Approach to Tribal Organizations

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

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

Native Americans are served in the general population and will be eligible to receive benefits equivalent to the assistance provided to other low-income persons living in Indiana.

V.2 Selection of Areas to Be Served

Selection of sub-grantees to implement the Weatherization Assistance Program is made in accordance with 440.15(a)(d). 440.15(a) - Preference is given to any sub-grantee that has administered, or is currently administrating, an effective program, with program effectiveness evaluated by consideration of factors including, but not limited to:

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- Demonstrated ability to achieve projected goals and objectives,
- Quality of weatherization work as demonstrated by past program performance,
- Ability to staff program with qualified, trained, and experienced employees,
- Previous program experience, both in weatherization and other low-income program, and
- Ability to fulfill procedures for fiscal record keeping under Indiana and Federal codes.

IHCDA contracts with twenty-one (21) sub-grantees to cover Indiana's 92 counties. Of the 21 sub-grantees, 19 are Community Action Agencies, People Working Cooperatively is a non-profit agency, and JobSource (DBA Central Indiana Community Action Program), is a unit of local government.

In August 2013, IHCDA reassigned three counties of service territory from NWICA to NCCAA. This reassignment was originally temporary in nature. During the 2016-2017 funding cycle NCCAA was awarded 3 counties previously assigned to NWICA. Reassignment of these three counties did not affect the number of sub-grantees, as the counties were transferred from an existing sub-grantee to another existing Subgrantee.

In December 2016, IHCDA decided to RFP Area V's service territory consisting of Cass, Miami, Wabash, Howard, and Tipton counties. A public RFP was posted in the 1st Quarter of 2017. In April 2017, these territories were reassigned to the following agencies: Brightpoint now services Miami and Wabash counties; NCCAA now services Cass county; JobSource now services Howard and Tipton counties.

In March 2017, HSI voluntarily relinquished its service territory consisting of Bartholomew, Decatur, Jackson, Johnson, and Shelby counties. A public RFP was posted in July 2017. In September 2017, these territories were reassigned to the following agencies: OVO now services Bartholomew, Jackson, and Decatur counties; ICAP now services Johnson and Shelby counties.

If one of the current 21 sub-grantees is unable to administer the Weatherization Program in their respective county or counties, or if their program is cited for non-compliance, corrective actions will be taken. With support from IHCDA and the awarded technical assistance provider, the Subgrantee in question will:

- Be placed on a 120-day Quality Improvement Plan (QIP). A QIP is prescribed to sub-grantees with a significant number of technical findings and/or program deficiencies. The QIP process includes drafting a remediation plan, assigning responsibilities for resolving findings, and fully participating in monthly monitoring visits.
- IHCDA also may implement a modified QIP. A modified QIP is prescribed to sub-grantees with less dire, but still numerous, findings and concerns. The modified QIP process includes drafting a remediation plan, assigning responsibilities for resolving findings, and quarterly monitoring visits.

If the QIP does not result in the correction of all issues in question, IHCDA has the option to either extend the QIP period or remove the Weatherization Assistance Program from the sub-grantee. If the State chooses to remove the weatherization program from the sub-grantee, IHCDA will go through the following actions to ensure continued service in the sub-grantee's service area:

- Removal of the program from the sub-grantee will typically not be done until a suitable organization can be found to administer the program, either on a temporary or permanent basis. Under certain circumstances, it may be necessary to remove the Weatherization Assistance Program (WAP) from a sub-grantee immediately if the territory is not being serviced by the sub-grantee, or if a sub-grantee is not operating under an active Weatherization Assistance Program (WAP) contract. Under these conditions, IHCDA will follow the Request for Qualifications (RFQ) and Request for Proposals (RFP) processes outlined below immediately following this process.
- If funding is removed in part from a particular sub-grantee, IHCDA will exercise discretion in either redistributing that funding to existing sub-grantees or new sub-grantee(s) using the RFP method identified below, or awarding funding to those sub-grantees meeting qualifications under 440.15(a) and are capable of handling additional funds, as evidenced by their grant spending in conjunction with production benchmarks.
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Reallocation of Funds

Sub-grantees failing to spend at least 80% of their awarded grant funds could be subject to funding allocation reduction or redistribution at IHCDA's discretion. Sub-grantees eligible for redistributed funds will be determined based on, but not limited to, the following criteria:

- Current level of expenditures for all active weatherization related programs.
- Timely and accurate submission of claims.
- Depth of existing waiting list.
- Timely and accurate submission of past closeouts.
- Financial and program management capacity.

IHCDA will desktop monitor sub-grantee production, expenditure rates, and average cost per home throughout the life of each DOE or LIHEAP grant. This desktop monitoring will occur in accordance with the funding benchmarks as established by the sub-grantee on the appropriate DOE or LIHEAP budget form. In cooperation with meeting production and expenditure benchmarks, sub-grantees must maintain the appropriate average cost per home of each DOE and LIHEAP Weatherization grant. Failure of the sub-grantee to maintain funding benchmarks, production levels, expenditure rates and/or the appropriate average cost per home may result in IHCDA reallocating funds. Any reallocation will be in an attempt to ensure proper utilization of Weatherization funds.

This desktop monitoring will consist of, at a minimum, a comparison of production as recorded in IWAP and the amount of grant funds claimed through IHCDAonline.

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This information will be used to track whether or not sub-grantees are maintaining the proper Average Cost Per Home for both DOE and LIHEAP as referenced and required above.

Please reference the IHCD grant agreements in Section 3, Specific Terms, Letter O (for DOE) and Letter L (for LIHEAP) and Section 4, Administration of Funds (both DOE & LIHEAP) for additional information and guidance regarding the Average Cost Per Home and administration of Weatherization grant funds.

Tiered Allocation

At IHCD's discretion, sub-grantees who have failed to meet program expenditure benchmarks across multiple program years, who are experiencing financial difficulty, or appear to have a lack of proper programmatic oversight may be placed on a tiered funding agreement. While on a tiered funding agreement, sub-grantees must expend funds according to a structured schedule. The performance benchmarks, or expenditure percentages, when possible, are based on the sub-grantee's performance in prior years. Failure to meet expenditure benchmarks will result in a reduction in funding with unspent funds to be redistributed to other eligible sub-grantees.

Tiered funding agreements will be included as part of the sub-grantee grant agreement where applicable.

Sub-grantees placed on a Tiered Allocation should anticipate an increased level of claim review by IHCD's Community Programs staff.

Reduction of Funds

A sub-grantee may receive a reduction in funding if one of the following conditions is present.

- A sub-grantee voluntarily returns one or more counties within its service territory.
- A sub-grantee returns substantial amounts of allocated funds over multiple years.
- A sub-grantee fails to complete a QIP within two consecutive program years.
- A sub-grantee fails to meet the expenditure benchmarks, as outlined in the grant agreements and budget forms, for multiple years.
- A sub-grantee is experiencing financial difficulties.

Request for Qualifications and Request for Proposals

The state may post a request for qualifications (RFQ) to identify organizations with qualifications suitable to provide service delivery within a particular service territory. The RFQ is designed to increase the service capacity of that local area and provide additional service opportunities to the program beneficiaries. A sub-grantee will be notified if an RFQ is posted for additional capacity provided within its service territory.

The goal is to find the most qualified service provider within a prescribed service territory. Therefore, it is important to note that RFQs are open to the general public as well as the community action network. Eligible applicants will be determined based upon the federal regulations for the program. IHCD will make a reasonable effort to assess if there is an adjacent, existing sub-grantee to support service delivery. Using an adjacent sub-grantee will be determined on a case by case basis.

Following a request for qualifications (RFQ) a request for proposals (RFP) will be issued as IHCD deems it necessary.

The RFP may also be posted for the following reasons:

- The primary sub-grantee has been on a QIP for more than two consecutive program years.
- Failure to meet expenditure benchmarks for more than two consecutive program years.
- Sub-grantee continues to demonstrate program deficiencies during monitoring visits for multiple program years.
- The primary sub-grantee voluntarily forfeits one or more counties within its service territory.
- IHCD has removed one or more counties from a sub-grantee due to performance issues.
- If a sub-grantee is involuntarily removed from a particular area due to fraudulent or major misappropriation of funds, legal action has been taken against the sub-grantee, or the sub-grantee dissolves.
- The territory is not being serviced by the sub-grantee.
- The sub-grantee is not currently operating under an active Weatherization Assistance Program (WAP) contract.

Like RFQs, the goal of the RFP is to find the most qualified service provider within a prescribed service territory. Therefore, it is important to note that RFPs are open to the general public as well as the community action network. Eligible applicants will be determined based upon the federal regulations for the program. IHCD will make a reasonable effort to assess if there is an adjacent, existing sub-grantee to support service delivery. Using an adjacent sub-grantee will be determined on a case by case basis.

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V.3 Priorities

Once eligibility has been determined, the sub-grantee must follow its client priority policy. Each sub-grantee will develop written procedures by which it assigns priority eligible households. In accordance with 10 CFR 440.16, priority must be given in identifying and providing weatherization assistance to households where one or more of the following exist:

1. High energy usage
2. High energy burden
3. Elderly household member(s) (60 years or over)
4. Disabled household member(s)
5. Household member(s) under the age of 18

Households who do not meet at least one of the priority categories may only be served if all eligible priority households in the Service Provider's territory have been served. Within the above listed priority, sub-grantees may choose the order in which households are served. Priority systems must be applied equally to both renter and owner occupied dwellings and applied equitably to all areas of the sub-grantee's territory.

Sub-grantees may choose to consider using the oldest application approval date for positioning applicants with priority points. An application with at least one priority point may be moved up on the list when working in the same area to save travel time.

Agencies that choose to develop their own methods for prioritizing clients must still adhere to federal regulation 10 CFR 440.16(b), develop written procedures, and seek approval of the methodology from IHCD. Each sub-grantee must develop a client-facing priority policy so that clients are able to understand the selection process. This policy will be reviewed during monitoring.

V.4 Climatic Conditions

Indiana's climatic data is compiled from the records of the National Oceanic and Atmospheric Administration (NOAA) from weather data collected from 150 sites in Indiana. Each sub-grantee has a unique average of heating degree days (HDD) that is determined by the weather data collected over the past 30 years from the counties the sub-grantee serves. For counties that did not have data collection sites, an average HDD was computed using data from adjoining counties. This step also ensures that sub-grantee service areas are in the same heat zone.

Indiana has two heat zones, which are divided based on average HDD by the U.S. Energy Information Administration. The upper two-thirds of the counties in the state are in Zone 2, which means they have between 5,500-7,000 HDD, while the lower one-third of the counties in the state are in Zone 3, which means they have between 4,000-5,499 HDD. In conducting tests for the waiver audit, homes are sampled from both climate zones. The formula used to calculate HDDs is as follows:

- Take the base temperature of 65 degrees and subtract the average daily temperature for a given calendar day to equal the heating degree days (example: 65-55=10 HDDs);
- Only days with average temperatures lower than the base temperature will be counted as HDDs;
- Repeat this process for each day of the year; and
- Add together the total HDDs for a sub-grantee's HDD's sum.

V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials

IHCD will ensure maximum energy savings by making certain that homes weatherized in Indiana receive the highest quality of work. The Indiana Weatherization Program accomplishes this by maintaining highly qualified monitors and a progressive training facility. To ensure that procedures are being properly applied, sub-grantees receive specific technical training along with field visits and enhanced training at the field site.

To meet requirements within WPN 15-4 IHCD added the following language to their sub-grantee contracts:

Sub-grantees shall perform weatherization services during the Term in accordance with the U.S. Department of Energy Weatherization Assistance Program State Plan for the State of Indiana, the Indiana Weatherization Field Guide, the Indiana Weatherization Policy and Procedures Manual, other State Weatherization directives as applicable, and any amendments thereto (collectively "State Weatherization Plan and Directives"). Upon completion of the document aligning Indiana's Weatherization Field Guide and DOE's Standard

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Work Specifications (SWS), sub-grantees shall abide by and perform all work in accordance with said document. The sub-grantees's signature on this agreement signifies its responsibility to follow all work standards as outlined in the documents referenced in this paragraph.

Additional language was added as follows:

Sub-grantees shall ensure that all Weatherization staff and sub-contractors who perform or provide Weatherization services to client homes receive and adhere to all standards as outlined in Indiana's Weatherization Field Guide, Indiana's Weatherization Policy and Procedures Manual, the Department of Energy Weatherization Assistance Program State Plan for Indiana and other State Weatherization directives as applicable. Upon completion of the document aligning Indiana's Weatherization Field Guide and DOE's Standard Work Specifications (SWS), sub-grantees shall abide by and perform all work in accordance with said document. The sub-grantees's signature on this agreement signifies its responsibility to follow all work standards as outlined in the documents referenced in this paragraph as well as its responsibility to ensure that its Weatherization staff and sub-contractors receive and review these documents and use them to guide the Weatherization work performed in client homes by them.

IHCDA utilizes the Indiana Weatherization Policy and Procedures Manual and the Indiana Weatherization Field Guide aligned with DOE's Standard Work Specifications to regulate the Weatherization services provided throughout the State of Indiana.

All WAP services provided by Indiana's Weatherization sub-grantees must be performed in compliance with either the DOE approved Site-Built/Mobile Home priority list, or a properly completed NEAT/MHEA run. All WAP services must also meet or exceed the expectations of Indiana's field guide/SWS and the requirements of 10 CFR 440, Appendix A.

Pursuant to WPN 15-4, Indiana partnered with the Indiana Community Action Association (INCAA) (Indiana's IREC Accredited WX Training Center) and Saturn Management Resources (Mr. John Krigger) to align Indiana's Field Guide with DOE's Standard Work Specifications in 2017. The most recent field guide and variances were approved by the DOE in June 2018. A 3-yr renewal will be required by June 2021.

The Field Guide also includes information and forms specific to Indiana's WAP.

To help prepare Indiana's Weatherization Network for the implementation of the updated field guide and SWS alignment, INCAA, in conjunction with IHCDA, will utilize Semi-Annual Technical Trainings and Semi-Annual Manager's Meetings to expose the network to the guides and remind them of implementation timelines. In addition to this training, INCAA will also perform T&TA visits to individual sub-grantees to assist them with understanding and using the aligned document.

IHCDA has received DOE approval for Indiana's SWS/Field Guide, IHCDA has made the document available to Indiana's Weatherization Network. Indiana's sub-grantees are required to implement and adhere to the aligned document. The links are also available on IHCDA's website and on the training center's website and identified within the IHCDA Weatherization Policy and Procedures Manual.

Indiana's Weatherization Policy and Procedures Manual contains requirements that sub-grantees follow, among other regulations, Indiana's aligned Field Guide and SWS. Every Subgrantee Weatherization Program Manager must sign a form indicating that they have received the Policy and Procedures Manual and realize that they are required to follow its guidance in implementing Indiana's Weatherization Assistance Program.

Indiana's Weatherization Policy and Procedures Manual is updated annually at the start of the DOE funding cycle. The major goal in updating the policy manual is to ensure that Indiana's sub-grantees have up-to-date guidance for properly managing Indiana's WAP. IHCDA ensures that the information in the policy manual is consistent with Indiana's aligned Field Guide and SWS as well as DOE, HHS, EPA and HUD guidelines where applicable. The policy manual also contains all required forms utilized within Indiana's WAP. The most recent update of Indiana's Policy and Procedures Manual was completed in January 2021. This updated manual was supplied to Indiana's Weatherization sub-grantees and INCAA as well as being posted on IHCDA's website. IHCDA will highlight the updates to the 2021 manual during two Semi-Annual Manager Meetings (SAMMs) conducted in the spring and fall of 2021.

In addition to the above information, IHCDA regularly encourages their sub-grantees to reference the wealth of Weatherization related knowledge contained on the NASCSP and DOE websites.

IHCDA also considers the training staff at INCAA and the contracted monitor(s) as technical guides and resources. These individuals are available by phone, email, and when possible, local visits. The combined years of Weatherization experience of these individuals make them a valuable resource to Indiana's WAP network.

Field guide types approval dates

Single-Family: 6/28/2018
Manufactured Housing: 6/28/2018
Multi-Family: 6/28/2018

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V.5.2 Energy Audit Procedures

Audit Procedures and Dates Most Recently Approved by DOE

Audit Procedure: Single-Family
Audit Name: Other (specify)
Indiana uses a DOE approved priority list or NEAT for site-built homes. Specific details for use of the priority lists as well as NEAT are outlined in the comments section below as well as IHCDAs Policy and Procedures Manual. Approved September 12, 2016.
Approval Date: 9/12/2016

Audit Procedure: Manufactured Housing
Audit Name: Other (specify)
Indiana uses a DOE approved priority list or MHEA for manufactured housing. Specific details for use of the priority lists and MHEA are outlined in the comments section below as well as IHCDAs Policy and Procedures Manual. Approved September 12, 2016.
Approval Date: 9/12/2016

Audit Procedure: Multi-Family
Audit Name: Other (specify)
Handled on a case-by-case basis per DOE multi-family regulations. Sub-grantees must submit a plan to IHCDAs prior to starting process. Specific details are contained in the comments section below as well as IHCDAs Policy and Procedures Manual.
Approval Date:

Comments

<p>Indiana's utilizes NEAT or MHEA audits for all weatherization work performed in the State.</p> <p>Smart thermostats are considered on all homes and audits. WPN 16-7 allows for replacement of incandescent bulbs with light-emitting diode (LED) and compact fluorescent (CFL) bulbs. They are targeted for areas where lights are left on for at least two hours a day. Subsequent to DOE's last approval of Indiana's energy auditing procedures for site-built and manufactured homes on September 12, 2016, Indiana requested that DOE allow light emitting diode lighting (LEDs) as an energy conservation measure to replace existing lighting. Indiana's request and associated submittals were reviewed in accordance with WPN 16-7 and 16-8 and was found to comply with §440.21(b) of the final rule. Indiana received approval from DOE on April 6, 2017 to use LEDs in WAP, and to replace 'CFL' with 'LED', provided that LEDs will be Energy Star qualified or of equal or better quality and efficiency.</p> <p>Refrigerator replacement is an allowable DOE and LIHEAP cost. Indiana requires comprehensive metering of the existing unit, and a NEAT or MHEA audit must be performed.</p> <p>Indiana's audit procedures:</p> <p>Subgrantee auditors conduct a whole-home audit and work is completed based on what the results of the audit specify is required to make the home more energy efficient. All homes being weatherized are treated with the whole-home system approach, with the goal of aligning thermal and pressure boundaries on every home. Additionally, as part of the whole home audit, extensive testing of combustion appliances is conducted to ensure client and worker health and safety. After the initial audit is completed, Subgrantee crews or contractors may then complete the weatherization work based on a site specific audit using NEAT or MHEA.</p> <p>The use of either a NEAT/MHEA Audit ensures that all completed work meets DOE and IHCDAs expectations for quality and effectiveness. Beginning April 1, 2021, sub-grantees must complete NEAT/MHEA audits on 100% of units.</p> <p>Incidental Repairs</p> <p>In NEAT/MHEA, (following DOE guidance) an Incidental Repair Measure (IRM) needs to be associated legitimately with an Energy Conservation Measure (ECM). The cost for the IRM is not tied to the Savings to Investment Ratio (SIR) for that ECM but is included in the calculation for the overall job SIR. An IRM or multiple IRMs may be performed as long as the overall job SIR is 1 or greater.</p> <p>The energy audit approval dated 9/12/2016 applies specifically to small multifamily buildings (between 5 & 25 units) which have individually heated, cooled domestic hot water (DHW) systems using NEAT. Buildings beyond that scope are handled on a case-by-case basis and require MulTEA to be used to perform the audit.</p> <p>Pursuant to 5 U.S.C. 552(b)(6) of the Freedom of Information Act, Subgrantees eligible to participate in utility programs, or participate in a state or regional-level study, are required to keep confidential any specifically identifying information related to an individual's eligibility application for WAP, or the individual's</p>

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participation in WAP, such as their name, address, or income information. IHCD and Subgrantees States may release information about recipients in the aggregate and which does not identify specific individuals (For example, information on the number of recipients in a county, city or a zip code does not compromise the privacy of the recipients). Subgrantees interested in participating in utility programs or studies must submit requests to IHCD for approval before entering into any third-party agreements.

V.5.3 Final Inspection

Each sub-grantee, or its authorized representative, is required to complete a pre- and post-inspection of each unit weatherized.

Initial Audits

Prior to any weatherization activities, each eligible unit must undergo a whole-home audit by a trained energy auditor (as defined in the Training Section of this manual. Audits are conducted according to either the DOE-approved waiver audit priority list or by performing a NEAT/MHEA/MulTEA audit.

Interim Inspections

An Interim Inspection is required on all units, except 100% electric without fireplaces. The purpose is to evaluate work performed on the mechanical systems to evaluate all health and safety issues that could be created or made worse by Weatherization measures. Interim inspections must be performed by an Energy Auditor, Quality Control Inspector, Retrofit Installer Mechanical, or HVAC Professional. IHCD prohibits anyone inspecting their own work that results in payment from the sub-grantee. Interim inspector must complete, sign, and date the appropriate form(s). Additionally, the interim inspector must include applicable notes and notate if the inspection passes or fails.

If work cannot be inspected within 45 days of invoice, an interim inspection must be performed to verify that the heating work is done correctly insuring payment can meet per the required 45-day deadline.

Quality Control Inspections

All units are required to receive a quality control inspection by a BPI Quality Control Inspector, as outlined in the Training Section of this manual and WPN 15-4.

All quality control inspections must be performed in accordance with 10 CFR 440.16(g) and [WAP Memorandum 010](#). The minimum requirements are:

- All applicable forms signed by QC inspector (with name printed also).
 - Date the QC inspection was completed.
 - Sign off by the QC inspector verifying the scope of work and it is in the file.
 - Identify corrections necessary (and full cycle of verification).
 - Review/verify all appropriate measures were on work order.
 - Identify/verify documentation and justification for any measures not installed are in the file.
 - Diagnostics at Inspection.
 - Sign off by the QC inspector verifying bid(s) against invoices; audit cost inputs against invoice actuals and make note of any areas where there is deviation from bid/audit input.
 - Client Signature – sign off the work was accomplished
-
- All materials have been properly installed.

Per DOE WPN 11-03, paying for additional work on homes that have already been reported to DOE is not a permissible use of DOE WAP funds. IHCD procedures state that a dwelling unit may not be reported as completed until a final inspection has been performed in accordance with 440.16(g), it has been certified that the work has been completed in a workmanlike manner and in accordance with approved procedures in 440.21, and all materials have been properly installed.

Following WPN 15-4, every completed home in Indiana must be inspected by a BPI Certified Quality Control Inspector.

IHCD ensures compliance with 440.16 (g) and WPN 15-4 by monitoring at least 10% of client files and at least 5% of homes completed by each Subgrantee to adjust for QCI/auditor combo.

IHCD will allow two options for meeting the Quality Control Inspection requirement. Sub-grantees must apply to IHCD in order to be able to utilize the Energy Auditor as the QCI option, and must indicate their intended method to IHCD for consideration. Sub-grantees that are unable to meet the deadline, or do not submit a plan to IHCD will be required to utilize an Independent QCI.

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Independent QCI

The QCI is an individual that has no involvement in the prior work on the home, either as the auditor or as a member of the crew. If this method is utilized, IHCDCA will monitor a minimum of 5% of DOE completions.

Energy Auditor / QCI

A. The auditor performs the audit, creates the work order, and performs the final quality control inspection. The auditor is not involved in any of the actual work on the home. Because this model does not allow for an independent review of the audit on every home, IHCDCA is required to increase the percentage of quality assurance reviews to ensure that audits are being performed consistently and correctly. IHCDCA will monitor a minimum of 10% of DOE completions.

B. Inspectors shall not participate in professional activities involving a conflict of interest. A conflict of interest occurs when an inspector is inappropriately motivated by any financial, personal, or professional incentive other than the production of a professional report that clearly, completely, and usefully reflects the conditions observed during the audit. Inspectors shall avoid, whenever possible, even the appearance of a conflict of interest and shall disclose all potentially questionable associations and relationships in advance to IHCDCA.

C. Inspectors shall not inspect work performed by organizations under arrangements whereby any compensation or future referrals to the inspector depend on or are influenced by the findings of the report. Compensation includes direct and indirect remuneration as well as substantial gifts and favors. Inspectors shall not accept any form of compensation for recommending products or services to clients or other parties having an interest in the inspected work.

D. Additional documentation may be required by IHCDCA if necessary, including:

- Documentation of the independent status of the Quality Control Inspector
- Documentation outlining any involvement of the QCI in the audit process

E. Quality control inspections are subject to IHCDCA assessment of effectiveness and compliance with program inspection policies and monitoring will include documentation of any findings related to the quality of the inspection and impartiality of the inspection process.

F. IHCDCA will maintain tracking of all sub-grantee QCI activities to include all aspects of the sub-grantee-developed QCI process, subsequent corrective actions, and final outcomes. The QCI auditor can not be the manager.

G. If QCIs are found to be out of compliance, remedial training may be required for the QCI, the installation contractor, and/or sub-grantee staff. Limited remedial training may be provided by IHCDCA staff on-site at the time of the monitoring, or more extensively through the training facility at INCAA if necessary. Alternatively, IHCDCA staff may provide more comprehensive training at a later date. Repeated non-compliance issues after remedial training may result in the agency being placed on QIP, or a reduction in funding. All compliance issues found with QCIs are subject to IHCDCA review, and may result in the QCI not allowed to perform inspections for Indiana WAP.

J. Sub-grantees may not be considered if one or more of the following program deficiencies are identified:

- General Administrative Deficiencies that include late interim or closeout reports, late completion reporting (data entry), lack of procurement policies, outdated cost allocation plans.
- Fiscal Reporting issues that include failure to claim expenses on a monthly basis, repeated occurrences where expenses are submitted more than 45 days after the invoice or purchase order date, contractors paid beyond the 45 day requirement.
- Staff or contractors fail to receive proper certifications.
- Average cost per home exceeds cost guidelines set forth by DOE or HHS (LIHEAP) funding.
- At least 25 percent of client files reviewed are deemed ineligible.
- High risk outcome on the Risk Assessment.

Sub-grantees are required to ensure that each weatherization completion receives an appropriate and properly executed final inspection. This inspection must be performed by a BPI-certified Quality Control Inspector (QCI). IHCDCA, as part of their regular monitoring procedures, will review final inspection forms, sub-grantee inspection processes and completed homes to ensure the inspections are being performed correctly and in a manner that meets DOE expectations as outlined in WPN 15-4. Failure by the sub-grantee to utilize the QCI process correctly may result in the associated completion(s) being considered unallowable, and all associated cost being returned to IHCDCA. Should multiple instances of poorly performed inspections be found, IHCDCA will, at the very minimum, place the sub-grantee on a Quality Improvement Plan (QIP). Should the QIP fail to correct the issues, IHCDCA will pursue further remedies for noncompliance as allowed in their Weatherization Policy and Procedures Manual and the sub-grantee grant agreement (contract).

Homes that have had a QCI conducted but the client has not signed off on the work, as long as three verifiable attempts have been made and recorded, that home can be counted as a completion, upon approval by IHCDCA.

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Monitoring Appeals Procedure

If the sub-grantee informally appeals (disagrees with) any item on the WAP Monitoring Report, the sub-grantee must send an informal appeal (email) to **IHCDA's Program Monitor** within ten (10) calendar days of the receipt of the monitoring report.

- IHCDA will respond within ten (10) calendar days of receipt of sub-grantee's Informal Appeal to the Monitoring Report.
 - If IHCDA agrees with all items identified in the sub-grantee's **Informal Appeal**, the sub-grantee will receive a revised monitoring report that will be used to ensure all actionable items are completed.
 - If IHCDA does not agree (in-full or in-part) with the sub-grantee's **Informal Appeal**, the sub-grantee will receive an **IHCDA Informal Appeal reply**.
- The sub-grantee will provide a **second response** within ten (10) calendar days. (If applicable)
 - If the sub-grantee agrees with the reasons described for not changing items identified in the informal appeal, the sub-grantee's second response is to be sent to the IHCDA.
 - If the sub-grantee disagrees (in-full or in-part) with IHCDA's **Informal Appeal** response, the sub-grantee may submit a **Formal Appeal** in writing to the Director of Community Programs. The Director of Community Programs will review the formal appeal and provide a written decision within thirty (30) calendar days. This decision will be final.

Terms and Conditions for Return of Funds in Monitoring

A return of funds transaction is initiated when paid grant funds need to be returned due to a monitoring or financial audit issue. A return of funds must be paid out of private agency funds. These funds will show on the claim summary but will not be returned to the sub-grantee's available budget. The state will reuse these funds in future allocations.

Some examples of disallowed costs might include, but are not limited to:

- Exceeding 20% of total expended funds on Health & Safety measures.
- Exceeding the current average cost per home.
- Interest expenses paid with DOE funds.
- Rework expenses except when specifically authorized by IHCDA.
- Disallowed equipment and vehicle purchases with DOE funds.
- Any measure not cost-justified.
- Any repair that exceeds the incidental repair measure limit for materials and labor.
- Expenditures incurred for the installation of measures on a completed unit outside of the client's eligibility period.
- Expenditures incurred for the installation of measures on a completed unit outside the contract period.
- If IHCDA cannot determine an expenditure is allowable because of inadequate records or documentation, IHCDA will request documentation. If documentation cannot be produced, the costs will be disallowed.

Sub-grantees are required to correct any deficient work identified by the Quality Control Inspector before the work is submitted for reimbursement. As a result of technical monitoring inspections, sub-grantees with incomplete work and workmanship issues will be allowed to rectify the problem before disallowances are levied. Sub-grantees will be asked to reverse or repay costs that are determined to be unallowable. If questioned costs are significant, an investigation may be performed, and the sub-grantee may be subject to additional review.

When deficiencies are identified, sub-grantees may be required to submit a corrective action plan within 30 days of receipt of the Technical Monitoring Report. The submission must include a description of the corrective actions to be taken as well as a timeline for implementation of those actions. The Corrective Action Plan will be submitted to IHCDA's Program Manager for review and approval.

When deficiencies persist, IHCDA may take any of the following actions: place the agency on a Quality Improvement Plan, designate the sub-grantee as high-risk, place the sub-grantee on a watch list, or suspend the sub-grantee's weatherization program in response to recurring major findings or persistent noncompliance with IHCDA and/or DOE WAP policy.

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A sub-grantee may appeal a return of funds or repayment following the monitoring appeals policy. Until further notice, all return of funds and repayments will be considered by the Director of Community Programs before being issued to sub-grantees.

IHCDA, in cooperation with INCAA developed a standardized final inspection form to be used by Indiana's sub-grantees and technical monitor. IHCDA has attached a copy of this QCI form to the SF-424. To meet the Quality Control Inspector (QCI) requirement as outlined in WPN 15-4 Indiana currently has 65 certified QCIs in place. All 21 of Indiana's sub-grantees either have a certified QCI on staff, or have made contractual arrangements to meet the requirements outlined in WPN 15-4. IHCDA will continue to provide testing opportunities within INCAA's Technical and Training Assistance contract to provide an ongoing opportunity for ongoing QCI testing. IHCDA hopes to continue adding QCI certified individuals throughout the 2019 Program Year.

In addition to the QCIs mentioned above, three trainers from INCAA have achieved the QCI certification.

Currently, IHCDA only pays for the first QCI testing attempt. If the candidate fails the first attempt the subsequent attempts are paid for either by the sub-grantee or the contractor. To facilitate the additional testing, INCAA incorporates test dates within their training schedule.

IHCDA's Weatherization sub-grantees are required to track and document all training and certifications of both Weatherization staff and sub-contractors. IHCDA reviews this information during monitoring to ensure that all requirements are being met. Tracking the QCI certifications and qualifications at each sub-grantee is a part of this monitoring process.

Indiana, in cooperation with INCAA, provides the opportunity for individuals to test for DOE's national Energy Auditor Certification through BPI. IHCDA is encouraging their network to test for this certification. Indiana currently has thirty-four (34) individuals who have successfully obtained the DOE/BPI Energy Auditor Certification.

V.6 Weatherization Analysis of Effectiveness

Energy Saving Effectiveness:

Starting in 2010, IHCDA and INCAA transitioned their method of assessment of weatherization effectiveness from Princeton Score keeping Method (PRISM) to work in conjunction with the Building Energy Analysis of Consumption (BEACon) system. This combination allows IHCDA to review a larger selection of homes for energy efficiency improvements, produces better electric savings information, and cuts down on administration costs in the long run since information can be gathered electronically. The BEACon reports were sent to each sub-grantee for them to review and use to measure their energy savings progress. Additionally, training was provided to the Indiana Weatherization Network during INCAA's annual CAP conference in July 2019. This training taught the attendees how to read and use these reports.

When available, the reports generated by the BEACon system provide results that are both based upon state wide averages as well as individual sub-grantees. These results are shared with each sub-grantee so that they know how they are performing. The information not only provides overall energy savings but provides indicators as to how each energy auditor, crew and contractor are performing. IHCDA strongly encourages each sub-grantee to utilize the information as a tool to identify where program improvements are needed.

IHCDA reviews the reports generated by the BEACon system to assess incentive pool participation, to gauge performance of sub-grantees in relation to energy savings, to gauge success of Indiana's WAP as a whole and project future needs.

Indiana may opt to utilize an incentive pool process in conjunction with issuing funding allocations that promotes energy savings and sound program management. DOE and LIHEAP allocations are distributed using the census-based allocation formula for 85% of Weatherization sub-grantees contracted funds. The remaining 15% of the allocation is distributed out to those Weatherization sub-grantees who meet all of the following criteria:

1. 95% or more of the prior program year contract total must have been expended.
2. Close Out Reports must be submitted and approved on time (within 45 days after the program year ends). IHCDA DMS, IWAP Quarterly, Job Expense and sub-grantee Close Out report must match exactly when final claims are processed, with all line items and averages being within allowable limits.
3. A 20% average energy savings as determined by PRISM/BEACon analysis of local sub-grantee production.
4. No Weatherization sub-grantee operating under a 120-day or modified Quality Improvement Plan (QIP) will be included in the incentive pool.
5. Weatherization sub-grantees must demonstrate regular use of the XRF for lead based paint testing.
6. Sub-grantee must meet the 45 day requirement for vendor and sub-contractor payments.

Sub-grantee Effectiveness:

To assess sub-grantees' procedural effectiveness, IHCDA monitors use a combination of monitoring and T&TA. Sub-grantees with deficiencies may be required to attend training specific to the sub-grantee's needs. Sub-grantee deficiencies and subsequent training include but are not limited to: lack of managerial oversight, inadequate technical, fiscal and database management, and client education procedures.

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In addition, IHCD and sub-grantee personnel continuously evaluate the effectiveness of training provided through IHCD and the technical assistance provider's (INCAA) training program. This is done through a combination of monitoring of sub-grantees, feedback at Semi-Annual Managers Meetings, and meetings with Indiana's Weatherization Training Center (INCAA).

IHCD reviews all reports prepared by the monitor(s) and IHCD's contracted monitoring team prior to monitoring reports being sent to the sub-grantees. This review allows IHCD to stay current on the issues being faced by each sub-grantee and work toward resolution of problem or weak areas.

During the 2017-2018 DOE funding cycle, IHCD and INCAA performed Optimizing Weatherization Resources Training. This training was targeted for Executive Directors, Fiscal Managers, and Weatherization Managers, and was intended to ensure that staff was aware of not only the federal guidelines regulating the use of Weatherization funds, but understand how to best use them in gaining enhanced energy efficiency for the clients we serve.

During the 2019-2020 DOE funding cycle, IHCD hosted SAMM's with specific fiscal and Executive Director break out sessions to ensure that staff was aware of not only the federal guidelines regulating the use of Weatherization funds, but understand how to best use them in gaining enhanced energy efficiency for the clients we serve.

V.7 Health and Safety

Please see the attachment 2021 Indiana Health and Safety Plan Draft, which is in the Optional Template format. Guidance from WPN 17-7 is addressed therein.

The Health and Safety expenditures are limited to 20% of Indiana's average cost per dwelling unit (ACPU) resulting in a Health and Safety average of \$1,339.60 per dwelling.

V.8 Program Management

V.8.1 Overview and Organization

The Indiana Weatherization Assistance Program is administered by the Indiana Housing and Community Development Authority (IHCD). IHCD is a quasi-governmental agency that administers numerous programs including the Low-Income Housing Tax Credit program, First-Time Home Buyer Assistance, Community Development Block Grant, HOME Investment Partnership funds, Emergency Shelter Grant, Low-Income Household Energy Assistance Program, Community Services Block Grant, and Neighborhood Stabilization Program, among others. IHCD is located within the Family of Business of the Indiana Lieutenant Governor's Office. IHCD is located in Indianapolis, IN.

IHCD staff responsible for the oversight of the Weatherization Assistance Program in Indiana are Chief of Staff and Chief Operating Officer Kyleen Welling, Director of Community Programs Emily Krauser, Community Programs Manager - Weatherization Carlos Bogue, and Community Programs Weatherization Analyst Desirea Island. The primary point of contact for Indiana's WAP is Emily Krauser.

IHCD utilizes the Indiana Community Action Association (INCAA) as the Weatherization Training Center for Indiana. INCAA is IREC accredited in all four of DOE's Job Task Analyses and has three IREC Certified Master Trainers. INCAA is located in Indianapolis, IN.

Colleen Hutson, of Hutson Homes, has provided programmatic monitoring for all twenty one (21) Weatherization Subgrantees in program year 2020-2021. Colleen Hutson will continue to perform the programmatic monitoring in program year 2021-2022. IHCD will review reports before they are distributed to Subgrantees.

Rob Durham, of The Inspector Inc. has provided technical monitoring for all twenty one (21) WEatherization Subgrantees in program year 2020-2021. Rob Durham will continue to perform the technical monitoring in program year 2021-2022. IHCD will review reports before they are distributed to Subgrantees.

Indiana utilizes twenty-one (21) sub-grantees to administer the Weatherization Assistance Program (WAP). Nineteen (19) sub-grantees are Community Action Agencies; one (1), People Working Cooperatively, is a nonprofit agency, and one (1), Job Source,(DBA CICAP) is a unit of local government.

V.8.2 Administrative Expenditure Limits

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Indiana's Weatherization Policy and Procedures Manual addresses the administrative limits for DOE funds as follows:

Administration – Actual costs, associated with administration include *fiscal, executive, support operations, rent and utilities, supplies, copying, etc.* This applies to staff engaged in program administration.

Indiana's sub-grantees may spend up to 10% of their total non-TTA award on administrative costs for PY 2021-2022. IHCDCA will retain 4.5% for Grantee use.

V.8.3 Monitoring Activities

Please Refer to section 8.7 Compliance (below) from the Policy and Procedure Manual

Colleen Hutson, of Hutson Homes, has provided programmatic monitoring for all of the Weatherization sub-grantees in program year 2020-2021. Colleen Hutson is formerly of the Subgrantee NCCAA and has extensive technical and programmatic experience, and is BPI QCI Certified. Hutson Homes will continue to be the contracted programmatic monitor for Weatherization program year 2021-2022. IHCDCA will review reports before they are distributed to sub-grantees.

Rob Durham, of The Inspector Inc. has provided technical monitoring for all of the Weatherization sub-grantees in program year 2020-2021. Rob Durham is formerly an independent Quality Control Inspector in Indiana and is BPI QCI Certified. The Inspector Inc. will continue to be the contracted technical monitor for Weatherization program year 2021-2022. IHCDCA will review reports before they are distributed to sub-grantees.

This monitoring expense is covered completely with T&TA funds. A draft monitoring schedule as well as document templates will be attached to the SF-424 section of this application when the final version is submitted. The monitoring expense is included in the budget.

IHCDCA, by using a combination of the monitoring entities mentioned above, visits each sub-grantee for programmatic, fiscal and technical reviews at least once per program year. All monitoring is performed in real-time, meaning that monitoring will keep pace with sub-grantee production during the course of a grant year. IHCDCA's technical monitoring process includes, when feasible, performing in-progress site visits. The primary purpose of monitoring visits are to assist the sub-grantees in providing high quality energy conservation services to low income homes.

The following information is taken from Section 8, Monitoring, of Indiana's Weatherization Policy and Procedures Manual detailing sub-grantee monitoring procedures in Indiana.

8.1 QUALITY ASSURANCE

The primary purpose of monitoring visits is to assist the Weatherization sub-grantee in providing high quality energy conservation services to low-income people. Monitoring also provides compliance review and information sharing to Weatherization sub-grantees to ensure:

- High quality, comprehensive weatherization services are provided consistently throughout the state
- Healthy, safe, and energy efficient housing improvements are provided to low-income households
- Program accountability and efficiencies are in effect and verifiable
- Federal, State and IHCDCA standards and regulations are followed

8.2 STANDARDS AND PRACTICES

IHCDCA will conduct fiscal, technical, file, and program monitoring annually. IHCDCA will review reports before they are distributed to sub-grantees.

Program Monitoring

The program monitoring includes a review of Program Administration, Procurement, Training, Competencies and Certifications, Database Input, Fiscal Information and Client File Review. At least 10% of completed DOE client files will be reviewed. Each area of the Program Review is explained in more detail below:

- **Program Administration** – IHCDCA will review agency policies as they apply to awarding priority, wait list maintenance, rental policies, and client redetermination.
- **Procurement** – This section covers materials procurement and selection; contractor selection procurement, and evaluation; price lists and written procurement standards. Reference the procurement section in this manual for additional information.
- **Training, Competency and Certification** - IHCDCA monitors will review whether the Weatherization Program Manager is using appropriately

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trained/competent staff to perform various job functions. The use of subcontractors will be reviewed to determine compliance with job function training requirements as outlined in this manual. Monitors will also review contractors for compliance with local licensing standards. Sub-grantee lead based paint practices and compliance with EPA and HUD regulations will also be reviewed.

- **Database Input** – A selection of the client files are checked to ensure information from the client files is reported in the IWAP database accurately and completely.
- **Fiscal** – IHCDCA will perform financial monitoring for their Weatherization sub-grantees. The financial monitoring will occur in conjunction with the Weatherization Program/File Monitoring. IHCDCA will check for appropriate payment processing as specified in this manual. The monitor will review the following:
 - Grant utilization to ensure funding is utilized in allowable combinations
 - Sub-grantees have properly tracked and utilized Program Income
 - Contractors are paid within 45 days
 - Back-up documentation provided with claims is appropriate
- **Client File Review** – Files will be pulled at random from completions entered into the IWAP database. A minimum of 10% of all completed DOE client files will be reviewed. A copy of the Program Monitoring Tool utilized by monitors can be found at <http://www.in.gov/myihcda/weatherization.htm> *Appendix F - Monitoring Tool 2020-2021 templet*. These files will be reviewed for:
 - Correct forms
 - Accurate information
 - Work processes
 - Eligibility verification
 - Appropriate documentation and allowability of deferrals
- **Training and Technical Assistance (T&TA)** – The purpose of T&TA is to provide sub-grantees with assistance in the technical aspects of the weatherization program. IHCDCA monitors will provide consultation while on site. If sub-grantee personnel feel it necessary, and time allows, IHCDCA monitoring personnel may be available for T&TA visits to the sub-grantee.

Technical Monitoring

IHCDCA will perform real-time Technical Monitoring for each Weatherization sub-grantee annually. The purpose of this monitoring is to ensure that weatherization services are provided in a professional manner in compliance with all standards, regulations and policies set forth by DOE, HHS and IHCDCA. The sub-grantee is responsible for quality control on all completed units and must ensure that the QC inspection completed by the QCI attests to the level of quality, professionalism, and appropriateness of all measures performed. Technical Monitoring will also review and inspect invoiced materials, justification for the number of labor hours charged, initial and final audit detail, and adherence to technical standards and accuracy of sub-grantee diagnostic testing.

Monitors will use the current QC Inspection Form. A minimum of 5% of all DOE completed homes will be monitored for those sub-grantees utilizing an Independent QCI, and a minimum of 10% of all DOE completed homes will be monitored for those sub-grantees with an Energy Auditor/QCI. IHCDCA reserves the right to monitor any unit including Capital Intensive unit(s).

Sub-grantee responses to technical findings must include documentation verifying that all findings and concerns have been corrected. IHCDCA when possible, will incorporate in-progress visits to client homes. IHCDCA's Technical Monitoring visits will include an evaluation of the Quality Control Inspector's process to ensure compliance with WPN 15-4.

Sub-grantees are required to ensure that each Weatherization completion receives an appropriate and properly executed QC inspection. This inspection will be performed by a BPI certified QCI. Failure by the sub-grantee to utilize the QCI process correctly may result in the affected completion(s) being considered unallowable and all associated cost being returned to IHCDCA. Should multiple instances of poorly performed inspections be found, IHCDCA will, at the very minimum, place the sub-grantee on a Quality Improvement Plan (QIP). Further action will be taken should the QIP fail to improve performance.

- **Field Inspections** (See Technical Monitoring below) – IHCDCA will conduct on-site inspections of a sample of units pulled from the file review or at random from the IWAP database. The purpose of this monitoring is to ensure that weatherization services are provided in a professional manner in compliance with all standards, regulations and policies set forth by DOE, HHS and IHCDCA. The local sub-grantee is responsible for quality control on all completed units and must ensure that the QC inspection completed by the BPI certified Quality Control Inspector (QCI) attests to the level of quality, professionalism, and appropriateness of all measures performed. The field inspection will cover the appropriateness of Base Load, Shell, and Health and Safety measures. During the field inspection, IHCDCA staff will be checking for all invoiced materials, justification for the number of labor hours charged, initial and final audit detail, adherence to technical standards, and accuracy of sub-grantee diagnostic testing.

8.3 MONITORING PROCESS

IHCDCA staff and contracted monitors prepare the monitoring schedule and contact each sub-grantee to schedule the appointments.

Upon completion of the monitoring, the monitor(s) will perform an exit conference to summarize issues found during monitoring, as well as to offer best practice recommendations. For Technical Monitoring visits, an exit conference may be delayed, conducted via telephone, webinars, etc.

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Program Monitoring Specific

Notification for program monitoring will include client files, financial information, procurement, training, etc.

Technical Monitoring Specific

Requests for Technical Monitoring include a list of units to visit as well as alternates when clients are unavailable.

Sub-grantees are prohibited from revisiting client homes chosen by IHCD for Technical Monitoring. Homes that are found to have been "revisited" prior to the Technical Monitoring visit will result in at least one additional home being selected for monitoring. IHCD may, at its discretion, require a Return of Funds for all expenses associated with the revisited home thereby removing it as a completed unit.

IHCD monitoring staff may use alternate procedures or request additional information to verify compliance when it is necessary or deemed appropriate.

8.4 LIHEAP PROGRAM AND TECHNICAL MONITORING

Monitoring for LIHEAP and Deferral Funds will be performed in conjunction with DOE monitoring and/or as deemed necessary by IHCD. LIHEAP and Deferral Program monitoring practices will be the same as outlined above for DOE.

For homes utilizing both DOE and LIHEAP the monitored process is outlined above. IHCD estimates that approximately 70% of Weatherization completions in Indiana utilize both DOE and LIHEAP funding.

8.5 MONITORING REPORTING PROCESS

Monitoring Report

Each sub-Grantee will receive a copy of the monitoring report within thirty (30) calendar days from completion of the exit conference. The report will identify such areas as training and technical assistance recommendations, summary of program /technical and client file/QCI findings and concerns, funding utilization per client, and NEAT/MHEA review.

- **Findings** should be classified as critical in nature and may require immediate corrective action by the sub-grantee (e.g. Health and Safety issue).
- **Concern** do not require immediate action by the sub-grantee and in many cases may not require action at all. These tend to be low to medium intensity issues.

The level of severity (classification as a finding/concern) may be based upon conditions in the field at the time of monitoring.

Findings and Concerns will be noted as:

- **Incomplete Work:**
 - Concern: Incomplete work that is minor, that has little or no cost, does not pose a health and safety issue and is not part of past trends for the agency, and depending on the circumstance may not be required to be repaired.
 - Finding: Incomplete work that includes past trend(s), is associated with a noteworthy cost, may affect the potential energy savings, or is a health and safety issue. These will require remediation.
- **Questioned Costs:**
 - Questioned costs are clarified with the sub-grantee. When deemed unallowable, they **will** be required to be returned or removed from DOE funding. Questioned costs are subject to additional review.
- **Client complaints**
 - When clients complain at the field monitoring, each complaint will be reviewed for validity.
- **Major Workmanship Issues**
 - Finding: Major workmanship issues must be resolved by the sub-grantee.
- **Minor Workmanship Issues**
 - Concern: If the minor workmanship issue is part of past trends, then it is treated as a major workmanship issue.

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Monitoring Report Response

The sub-grantee must either **Accept** the submitted report or provide an **Informal Appeal** (see Monitoring Appeal Process) to specific findings and concerns. The sub-grantee will have ten (10) calendar days from the receipt of the monitoring report to submit a written response per the monitoring report.

Any corrective action taken by the sub-grantee is considered an acknowledgment of the finding or concern. Failure by the sub-grantee to respond in writing to the monitoring report by the established deadline may result in claims being held by IHCDA until the proper response is received.

Monitoring Appeals Process (Informal or Formal)

If the sub-grantee informally appeals (disagrees with) any item on the WAP Monitoring Report, the sub-grantee must send an informal appeal (email) to IHCDA's Program Monitor within ten (10) calendar days of the receipt of the monitoring report.

- IHCDA will respond within ten (10) calendar days of receipt of sub-grantee's Informal Appeal to the Monitoring Report.
 - If IHCDA agrees with all items identified in the sub-grantee's **Informal Appeal**, the sub-grantee will receive a revised monitoring report that will be used to ensure all actionable items are completed.
 - If IHCDA does not agree (in-full or in-part) with the sub-grantee's **Informal Appeal**, the sub-grantee will receive an **IHCDA Informal Appeal reply**. The response will acknowledge which findings and/or concerns have been approved or still stand as identified.
- The sub-grantee will provide a **second response** within ten (10) calendar days. (If applicable)
 - If the sub-grantee agrees with the reasons described for not changing items identified in the informal appeal, the sub-grantee's second response is to be sent to the IHCDA.
 - If the sub-grantee disagrees (in-full or in-part) with IHCDA's **Informal Appeal** response, the sub-grantee may submit a **Formal Appeal** in writing to the Director of Community Programs. The Director of Community Programs will review the formal appeal and provide a written decision within thirty (30) calendar days. This decision will be final.

Monitoring Completion

Once all parties are in agreement with all the findings and concerns, the sub-grantee will have thirty (30) calendar days to close out the monitoring session. The sub-grantee will receive a Monitoring Completion Letter after all completed corrective actions and/or copies of checks paid to IHCDA have been submitted.

8.6 RETURN OF FUNDS (IN MONITORING)

A return of funds transaction is initiated when paid grant funds need to be returned due to a monitoring or financial audit issue. A return of funds must be paid out of private agency funds. These funds will show on the claim summary but will not be returned to the sub-grantee's available budget.

Examples of disallowed costs include, but are not limited to:

- Exceeding 20% of total expended funds on Health & Safety measures
- Exceeding the current average cost per home
- Interest expenses paid with DOE funds
- Rework expenses when job has been closed, except when specifically authorized by IHCDA
- Disallowed equipment and vehicle purchases with DOE funds
- Any measure not cost justified.
- Any repair that exceeds the incidental repair measure limit for materials and labor
- Expenditures incurred for the installation of measures on a completed unit outside the contract period.
- If IHCDA cannot determine an expenditure is allowable because of inadequate records or documentation, IHCDA will request additional documentation. If documentation cannot be produced, the costs will be disallowed.

8.7 COMPLIANCE

Compliance is essential in assuring overall program success. Sub-grantees are monitored to determine whether they have continuously met the established program guidelines, government legislation, IHCDA contract, the IHCDA provided Program Manual, and IHCDA Information Memoranda. Failure to meet the minimum monitoring standards will result in corrective action.

Quality Improvement Plan (QIP)

Monitoring visits where serious, numerous, or recurring findings may result in the sub-grantee being placed on a QIP. The intent of the QIP is to help the sub-grantee improve the areas of deficiency. As part of the QIP, IHCDA monitors will make additional visits to the sub-grantee to ensure changes are being

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implemented and all noted deficiencies are being resolved. The QIP may be modified as deemed necessary by IHCDCA to accomplish the needed sub-grantee improvement.

Modified Quality Improvement Plan (MQIP)

Similar to a Quality Improvement Plan, a MQIP requires less oversight and time frame to accomplish the stated compliance objectives.

Program Monitoring

A sub-grantee may be placed on a QIP if one or more of the following program deficiencies are identified:

- General Administrative Deficiencies that include late interim or closeout reports, late completion reporting (data entry), lack of procurement policies, outdated cost allocation plans
- Fiscal Reporting issues that include failure to claim expenses on a monthly basis, repeated occurrences where expenses are submitted more than 45 days after the invoice or purchase order date, contractors paid beyond the 45 day requirement
- Staff or contractors fail to receive proper certifications.
- Average cost per home exceeds cost guidelines set forth by DOE or HHS (LIHEAP) funding
- At least 25 percent of client files reviewed are deemed ineligible (*DOE funding may not be used for ineligible homes)

Sub-grantees who have been placed on a QIP will receive additional oversight, including increased monitoring site visits.

Technical Monitoring

A sub-grantee may be placed on QIP when excessive findings and/or repetitive findings/concerns are identified.

Monitoring Notes

IHCDA reserves the right to question all associated costs and may require that the sub-grantee repay grant funds to IHCDCA out of private agency funds or non-federal dollars. Examples for repayment are the following: insufficient justification for work performed, insufficient documentation, ineligible clients, lack of adherence to policy or Federal guidelines, or evidence of negligence resulting in a dangerous condition for a client. IHCDCA monitoring staff may use alternate procedures or request additional information to verify compliance when it is necessary or deemed appropriate.

Failure by the sub-grantee to respond in writing to the monitoring report by the established deadline may result in claims being held by IHCDCA until the proper response is received. IHCDCA regularly tracks DOE, LIHEAP and State LIHEAP expenditures, production and average cost per home. IHCDCA may, at their discretion, reallocate funding during the grant cycle should grant tracking reveal low sub-grantee expenditure or production rates as well as issues with their average cost per home.

IHCDA has implemented benchmarks of 15% DOE production by the end of the 1st Quarter (July 1, 2021), 40% DOE production by the end of the 2nd Quarter (October 1, 2021), and 80% by February 1, 2022 for all sub-grantees. IHCDCA will use these benchmarks to track sub-grantee progress with Weatherization funding.

Sub-grantees failing to spend at least 80% of their awarded grant funds could be subject to funding allocation reduction or redistribution at IHCDCA's discretion.

IHCDA may, at their discretion, reallocate funding during the grant cycle should grant tracking reveal low sub-grantee expenditure or production rates. Sub-grantees eligible for redistributed funds will be determined based on, but not limited to, the following criteria:

- Current level of expenditures for all active weatherization related programs
- Timely and accurate submission of claims
- Depth of existing waiting list
- Met self-imposed benchmarks
- Financial and program management capacity

IHCDA will devote a portion of Indiana's T&TA funds toward salary and travel expense associated with monitoring of their sub-grantees. These amounts are broken down within the budget portion of this application.

The following is IHCDCA's proposed Technical Monitoring Schedule for Program Year 2021-2022:

July 2021 - NCCAA, SIEOC, NWICA

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August 2021 - CAGI, CANI, COWI, WICAA
September 2021 - Real Services, CFS, Area IV

October 2021 – OVO, Jobsource/CICAP, PWC
November 2021 – CASI

December 2021 – TRI-CAP
January 2022 – CAPE, LHDC

February 2022 – HUEDC, ICAP, PACE, SCCAP

March 2022 - (Available for necessary adjustments to schedule)

IHCDA annually prepares a spreadsheet detailing the number of client files and homes to be monitored at each sub-grantee and will include the spreadsheet as an attachment to the SF-424 section of this application when the final version is submitted in February 2021. This is a draft schedule and is subject to change.

A copy of the Program Monitoring Tool for program year 2021-2022 will be uploaded to the IHCDA Weatherization sub-grantee website prior to the start of monitoring.

A copy of the Technical Monitoring Tool for program year 2021-2022 will be uploaded to the IHCDA Weatherization sub-grantee website prior to the start of monitoring.

Section 8 of Indiana's Weatherization Policy and Procedures Manual covers the monitoring practices and requirements followed by IHCDA. A copy of Indiana's Weatherization Policy and Procedures Manual will be attached to the SF - 424.

Additional information regarding the potential removal of a Subgrantee is contained within Indiana's grant agreements with each Subgrantee. Below is the language from the DOE grant agreements between IHCDA and their Subgrantees regarding possible suspension and termination.

SUSPENSION AND TERMINATION

1. If either party has failed to comply with the terms of this Agreement, the other party may, upon written notice to the party in breach, suspend services or payment in whole or in part or terminate this Agreement. The notice of suspension or termination shall state the reasons for the suspension or termination, any corrective action required of the party in breach, and the effective date. Notice shall be provided by certified or overnight mail.
2. If IHCDA determines that any breach of this Agreement by Sub-grantee endangers the life, health, or safety of its employees or agents, or applicants for or recipients of services under this Agreement, IHCDA may terminate this Agreement by orally notifying Sub-grantee of the termination, followed by the mailing of written notification thereof within three (3) business days specifying the reasons for the termination. Termination pursuant to this paragraph shall become effective at the time of the oral notification.
3. When the Executive Director of IHCDA makes a written determination that funds are not appropriated or otherwise available to support continuation of performance of this Agreement, the Agreement shall be canceled. Such determination by the Executive Director that funds are not appropriated or otherwise available shall be final and conclusive.
4. Sub-grantee agrees that IHCDA may terminate this Agreement if Sub-grantee ceases doing business for any reason. IHCDA will notify Sub-grantee of the termination, in writing, by overnight, registered or certified mail. The termination shall be effective from the date Sub-grantee ceases doing business.
5. The parties acknowledge and agree that this Agreement may be terminated immediately by either party should the other party attempt to assign, transfer, convey, or encumber this Agreement in any way. Any notice of termination pursuant to this paragraph shall be provided in writing to the other party, by overnight, registered or certified mail.
6. This Agreement may be suspended and/or terminated immediately if Sub-grantee has committed fraud or has misused or misappropriated funds received under this Agreement or another agreement between the Sub-grantee and the IHCDA. In this event IHCDA may de-obligate and/or re-distribute all or any portion of this award to another Sub-grantee. Further, Sub-grantee's breach or default with respect to other agreements or obligations related to WAP shall constitute a material breach of this Agreement.
7. This Agreement may be terminated, in whole or in part, by the IHCDA whenever, for any reason, the IHCDA determines that such termination is in the best interest of the IHCDA. Termination shall be effected by delivery to the Sub-grantee of a Termination Notice, specifying the extent to which such termination becomes effective. The Sub-grantee shall be compensated for completion of the services or activities properly performed prior to the effective date of termination. The IHCDA will not be liable for activities or services performed after the effective date of termination.
8. Sub-grantee shall provide written notice to IHCDA of any change in Sub-grantee's address, legal name, or legal status including, but not limited to, a sale or dissolution of Sub-grantee's business. IHCDA reserves the right to terminate this Agreement should Sub-grantee's legal status change in any way. Termination pursuant to this paragraph shall be effective from the date of the change in Sub-grantee's legal status. Notice shall be provided by certified or overnight mail.
9. If this Agreement is terminated pursuant to any paragraph in this section, Sub-grantee shall remit to IHCDA, within forty-five (45) days of such termination, any unexpended funds and such other payments received by Sub-grantee determined to be due IHCDA. The action of IHCDA in accepting any such amount shall not constitute a waiver of any claim that IHCDA may otherwise have arising out of this Agreement.
10. Upon expiration of any fiscal year period specified in Attachment A, or termination of this Agreement, IHCDA may require that all documents including, but not limited to, client files, data, studies, and reports prepared by Sub-grantee pursuant to this Agreement, and all property purchased by Sub-grantee

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with IHCD, state, or Federal funds under this Agreement, be delivered to IHCD. IHCD may require the transfer of records or property to its own offices or to a designated successor.

11. IHCD shall provide a full and detailed accounting of any property or records taken from Sub-grantee and shall make any records available to Sub-grantee as necessary for subsequent audit. IHCD and Sub-grantee may negotiate amounts of reimbursement related to Sub-grantee's expenses for a period of closeout. In no event, however, shall IHCD reimburse Sub-grantee an amount exceeding the Total Grant Amount set forth in Attachment A of this Agreement.
12. If this Agreement is terminated for any reason, IHCD shall only be liable for payment for services properly provided prior to the effective date of termination. IHCD shall not be liable for any costs incurred by Sub-grantee in reliance upon this Agreement subsequent to the effective date of termination.
13. Sub-grantee acknowledges and agrees that due to programmatic changes required in the WAP by IHCD, the United States Department of Energy, and/or Health and Human Services, IHCD may terminate this Agreement at the end of any fiscal year period specified on Attachment A upon sixty (60) days written notice to Sub-grantee specifying the reasons for termination.
14. In the event this Agreement is terminated pursuant to this section, the Sub-grantee shall cooperate with IHCD to ensure a smooth transition of services to recipients of the WAP.

Should a sub-grantee need to be suspended or their agreement terminated, IHCD will not do so until every effort has been made to locate another weatherization provider for the affected area so that clients may continue to receive services. In the event that finding a replacement provider is necessary, IHCD will follow the guidelines for weatherization sub-grantees detailed in 10 CFR 440 as well as any applicable DOE and IHCD regulations.

Single Audits: Currently the single audit reports for Indiana's Weatherization Subgrantees are reviewed by IHCD's Financial Operations Department. Any issues or concerns that are Weatherization specific are brought to the attention of IHCD's Director of Community Programs to determine if the response supplied by the sub-grantee is sufficient or if IHCD will require additional information or response.

V.8.4 Training and Technical Assistance Approach and Activities

Indiana utilizes T&TA to properly train all Weatherization Program Managers, Energy Auditors, Quality Control Inspectors, Crew Leaders, Retrofit Installers-SHELL/HVAC, and appropriate Grantee Staff. Training includes those who are in-house personnel and subcontractors working for the Grantee and Subgrantees. The T&TA training also trains and teaches on Monitoring practices.

Indiana's Weatherization Training Center is the Indiana Community Action Association (INCAA). INCAA is an IREC Accredited organization covering all four DOE Job Task Analyses (Energy Auditor, Quality Control Inspector, Crew Leader and Retrofit Installer Shell). INCAA received their 5 year re-accreditation on January 17, 2019.

T&TA is also utilized to provide sub-grantees with additional technical assistance in the technical and administrative aspects of Indiana's Weatherization Assistance Program. IHCD's Weatherization Manager is available daily via phone and/or email to answer programmatic questions. Sub-grantees with more serious needs may schedule/request an on-site visit from IHCD or INCAA training staff.

IHCD and INCAA work together closely to ensure that Indiana's Weatherization Assistance Network receives the necessary training to meet DOE and IHCD requirements. Adjustments are made throughout the funding cycle as necessary to meet the T&TA needs of Indiana's Weatherization Network.

Sub-grantees will be allotted a \$2,000 base award with an additional \$500 for every county serviced by the sub-grantee per grant cycle for the purpose of providing Training and Technical Assistance for sub-grantee staff and contractors interested in performing weatherization work for the Sub-grantee. These funds may be used to cover only those expenses related to weatherization training, including:

- Class Fees
- Material Fees
- Written / Field Testing
- CEU Events
- Wage / Time reimbursement
- Travel Expenses (excluding meals)
- Lodging
- Providing reasonable meals at annual contractor trainings

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Contractors must demonstrate their commitment to providing weatherization services for the Sub-grantee by having an active contract with the Sub-grantee before being considered for the stipend. Requests for stipends to reimburse contractors without an active contract must be reviewed by IHCDCA.

Sub-grantees that use a stipend for contractors and staff must provide training documentation to IHCDCA upon submitting claims for the stipend. Training records must contain clear documentation and verification that the required and appropriate training was attended and completed. Examples of this documentation include copies of training certificates, sign-in sheets, and BPI student portal information.

Examples of allowable courses are listed on INCAA's website, as well as those outlined in policy manual section 8. Sub-grantees must have approval from IHCDCA for classes not listed prior to attending if the stipend will be used. Other associated costs related to training not listed above must first be approved by IHCDCA. Requests for additional funds will be submitted to IHCDCA for review.

Indiana addresses client energy education within the courses taught at INCAA. Comprehensive client education is provided to the Weatherization program through INCAA's Client Education course, however, client education components are also covered in the Energy Auditor, Quality Control Inspector, Retrofit Installer Shell and also Mechanical, and the ASHRAE 62.2 courses. Several additional courses taught at INCAA also have components of Client Education embedded into those curriculums. Indiana believes that establishing a solid foundation in client education is paramount to attaining optimal energy savings, to ensuring the durability of measures installed, for improvement in indoor air quality, and for building positive relationships between the clients and the WAP personnel. All persons involved in the Indiana WAP play a vital role in establishing effective client energy education.

INCAA has available the following classes for the 2021-2022 DOE funding cycle:

Retrofit Installer Shell

Retrofit Installer Mechanical

Energy Auditor

Crew Leader

BPI Quality Control Inspector

Zone Pressure Diagnostics

High Performance Insulation

Daily Safety Test Out Procedures

Mobile Home Weatherization

Carbon Monoxide and Combustion Analysis

Electric Furnace & Heat Pump Inspections for Auditors/QCI's

Electric Furnace & Heat Pump Inspections for HVAC Professionals

Oil Furnace Training

Vent Systems & Combustion Air Requirements

Heating System Airflow Diagnostics

Mechanical Systems for Auditors

CAZ Pressure Diagnostics for Auditors and Heating Techs

NEAT/MHEA

New Furnace Installation Inspections

Applying The ASHRAE 62.2

Global Worker Safety

DOE Health & Safety Policy

Healthy Homes Evaluator

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Communication in Weatherization

Water Heater Inspection

Client Education

SWS for Shell Professionals

SWS for Energy Auditors/QCI

SWS for HVAC Professionals

Lead Safe Weatherization

Moisture Assessment

Testing for DOE's QCI and Energy Auditor Certifications

Multi-Family QCI Training for QC

Multi-Family Training Building Analyst for Energy Auditors

Optimizing Weatherization Program Resources

OSHA 10

SHPO Training

Indiana currently requires competency testing for all individuals performing work as an Energy Auditor, Quality Control Inspector, MF Building Analyst, and MF QCI, Retrofit Installer Shell, Retrofit Installer Mechanical and Crew Leader-Shell. The requirements and timelines for these competencies are contained in Section 8 of Indiana's Weatherization Policy and Procedures Manual. Section 8 will be included in the Policy and Procedures Manual attached to the SF-424.

Sub-grantees are required to ensure that all staff and contractors meet IHCD and applicable DOE training requirements and properly track training documentation. IHCD reviews the training documentation and tracking during their monitoring process to ensure compliance.

Time Limits for becoming Indiana Weatherization Competent:

- All Sub-grantee staff/contractor new employees will have nine (9) months commencing 45 days from their date of hire to become Indiana Weatherization Competent in the categories of Energy Auditor, Retrofit Installer (Shell and/or Mechanical) and Crew Leader.
- All Sub-grantee staff/contractor new employees will have nine (9) months commencing 45 days from their date of start in specific training for BPI QCI to obtain BPI QCI Certification.
- Sub-grantees are allowed to enroll new staff/contractor employees in training prior to the expiration of the 45 days if they choose to do so. This decision should be based upon the expectation that the new staff/contractor employee will be retained in their new position.
- Sub-grantees may shorten the 45 day grace period to 30 days provided this shortened time period is approved by IHCD and included in the Sub-grantee's policy and human resources manuals.

Each IHCD sub-grantee is responsible for accurately tracking all staff and/or contractor competencies and certifications.

This tracking must include the following information:

- Individual name and competency(s) and/or BPI certifications held
- Date competencies and/or BPI certifications expire
- Hire date
- Attendance at Annual Competency Maintenance Training
- Current BPI/INCAA Certifications where applicable
- Record of training for 16 hours of CEUs
 - IHCD will verify training records and qualifications of all sub-grantee staff, crew members and contractors annually near the end of March. Sub-grantees must be prepared to provide training documentation whenever it is requested by IHCD. Training records must contain clear documentation and verification that the required and appropriate training was attended and completed. Examples of this documentation include copies of training certificates, sign-in sheets (conferences for example), and BPI student portal information. IHCD may, at their discretion, monitor the tracking and completion of the required training at times other than listed in the bullet point above.

All sub-grantee staff/contractor new employees will have nine months commencing 45 days from their date of hire to become Indiana Weatherization Competent in the categories of Energy Auditor, Retrofit Installer (Shell and/or Mechanical) and Crew Leader. All Indiana Weatherization Competent, QCI and

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BPI certified individuals are required to attend an Annual Competency Maintenance Training in years two and three of their competency(s) or BPI Certification.

. Comprehensive client education is provided to the Weatherization program through INCAA's Client Education course, however, client education components are also covered in the Energy Auditor, Quality Control Inspector, Retrofit Installer Shell and also Mechanical, and the ASHRAE 62.2 courses. Several additional courses taught at INCAA also have components of Client Education embedded into those curriculums.

T&TA Activities anticipated to take place during the 2021-2022 DOE Funding Cycle include, but are not limited to the following:

Continued testing for BPI QCI and DOE/BPI Energy Auditor Certification

Testing for BPI Crew Leader Certification

Testing for BPI Healthy Home Evaluator Certification

Continued participation and attendance to NASCSP Conferences
Continued training and testing for Indiana's competencies

Work with Sub-grantees and INCAA training staff to develop quarterly "Best Practice" T&TA meetings that allow

Weatherization staff to share successful processes and practices
Provide Optimizing Weatherization Resources Training for Sub-grantee Executive Directors & financial staff
Provide RRP initial and refresher training for Indiana's Weatherization Network
Provide OSHA 10-hour training opportunities
Provide Multi-family Building Analyst and QC training

Enhanced focus on NEAT and MHEA training and use within Indiana's Weatherization Network
Research and Development by INCAA on improving forms, researching current practices, etc.
Provide MulTEA training for Multi-Family audits

In 2019, Indiana received the energy savings results from PRISM/BEAcon to evaluate energy savings at each sub-grantee. This program was used to evaluate one year pre- and post-weatherization utility usage of metered fuels. These results are shared with sub-grantees revealing their individual results along with the state averages. Each sub-grantee is encouraged to evaluate the savings information to see how they performed individually and in comparison to the state average. The information shared from PRISM / BEAcon also breaks down the performance of each contractor and energy auditor. Sub-grantees are also encouraged to look at this information to identify top performers and those who may need additional training or oversight.

In the past, savings information was utilized as part of Indiana's incentive pool for future and active funding opportunities. **In PY2021-2022 IHCD does not plan to use the incentive pool, because the energy savings data is not available from the previous program year.**

Below is the incentive pool guidelines if IHCD opts to use:

DOE and LIHEAP allocations are distributed using the census-based allocation formula for 80% of Weatherization Sub-grantees contracted funds. The remaining 20% of the allocation is distributed out to those Weatherization Sub-grantees who meet all of following criteria:

1. 95% or more of the prior program year contract total must have been expended.
2. Close Out Reports must be submitted and approved on time (within 45 days after the program year ends). IHCD DMS, IWAP Quarterly, Job Expense and Sub-grantee Close Out report must match exactly when final claims are processed, with all line items and averages being within allowable limits.
3. A 15% average energy savings as determined by PRISM/BEAcon analysis of local Sub-grantee production.
 - Effective April 1, 2017, the savings benchmark for consideration for inclusion in the incentive pool will raise to 20%, if IHCD uses an incentive pool
4. No Weatherization Sub-grantee operating under a 120-day or modified Quality Improvement Plan (QIP) will be included in the incentive pool.
5. Weatherization sub-grantees must demonstrate regular use of the XRF for lead based paint testing.
6. Sub-grantee must meet the 45 day requirement for vendor and sub-contractor payments.

No Weatherization sub-grantee operating under a 120-day or modified Quality Improvement Plan (QIP) will be permitted to be included in the incentive pool during the QIP period. No Weatherization sub-grantee operating under a Tiered Funding Agreement will be permitted to be included in the incentive pool.

Indiana uses the above process to promote full grant expenditure, quality program management and performance, and demonstrated energy savings.

IHCD will utilize T&TA funds as outlined above to ensure compliance with all of DOE's deadlines regarding final inspections, the QCI Certification and alignment of Indiana's Weatherization Field Guide with DOE's Standard Work Specifications.

Indiana does not foresee any difficulties being able to provide the required Tier 1 and or Tier 2 training as required per DOE WPN 15-4, through the use of INCAA for the Weatherization Training Indiana provides.

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To meet requirements within WPN 15-4 IHCD added the following language to their Sub-grantee contracts:

Sub-grantee shall perform weatherization services during the Term in accordance with the U.S. Department of Energy Weatherization Assistance Program State Plan for the State of Indiana, the Indiana Weatherization Field Guide, the Indiana Weatherization Policy and Procedures Manual, other State Weatherization directives as applicable, and any amendments thereto (collectively "State Weatherization Plan and Directives"). Upon completion of the document aligning Indiana's Weatherization Field Guide and DOE's Standard Work Specifications (SWS), Sub-grantee shall abide by and perform all work in accordance with said document. The Sub-grantee's signature on this agreement signifies its responsibility to follow all work standards as outlined in the documents referenced in this paragraph.

Additional language was added as follows:

Sub-grantee shall ensure that all Weatherization staff and sub-contractors who perform or provide Weatherization services to client homes receive and adhere to all standards as outlined in Indiana's Weatherization Field Guide, Indiana's Weatherization Policy and Procedures Manual, the Department of Energy Weatherization Assistance Program State Plan for Indiana and other State Weatherization directives as applicable. Upon completion of the document aligning Indiana's Weatherization Field Guide and DOE's Standard Work Specifications (SWS), sub-grantee shall abide by and perform all work in accordance with said document. The sub-grantee's signature on this agreement signifies its responsibility to follow all work standards as outlined in the documents referenced in this paragraph as well as its responsibility to ensure that its Weatherization staff and sub-contractors receive and review these documents and use them to guide the Weatherization work performed in client homes by them.

Prior to issuing the 2021-2022 DOE Grant Agreements, IHCD ensure the above language is included to indicate that all work performed will meet or exceed Indiana's Weatherization Field Guide/SWS aligned document.

Tier 1 and Tier 2 Training:

Indiana will continue to work with INCAA to provide the needed Tier 1 and Tier 2 training as required by WPN 15-4. INCAA continues to offer training for Quality Control Inspector, Energy Auditor, Retrofit Installer Shell and Crew Leader.

For Tier 2 training, INCAA continues to offer the following, but are limited to the following training opportunities: Moisture Assessment, Daily Safety Test Out, Retrofit Installer Mechanical, Lead Safe Work Practices, Applying ASHRAE 62.2 - 2016, Optimizing Weatherization Resources, Program Management, SWS (for all certifications), Client Education, CAZ Pressure Diagnostics, NEAT / MHEA training, Mechanical Systems for Auditors, Electric Furnace and Heat Pump Inspections, Vent Systems and Combustion Air Requirements, Boiler Inspections, Carbon Monoxide and Combustion Analysis, Oil Furnace Training, and New Furnace Installation Inspections.

INCAA's class registration system is capable of placing students on a waiting list if a class is full at the time of registration. By utilizing the waiting list, INCAA, in cooperation with IHCD, can monitor the need for classes and change the schedule as necessary. INCAA utilizes this information to populate the classes as they move forward through the grant cycle.

IHCD recognizes that the primary focus for Tier 1 training during the 2020-21 Program Year to be on all Tier 1 training, including Quality Control Inspector, Energy Auditor, Retrofit Installer Shell and Crew Leader. Additionally, INCAA will be working throughout the year to develop a BPI Multifamily QC course. IHCD understands the importance of ensuring that the new information contained within WPN 17-7 Health and Safety guidance, as well as Indiana's updated SWS-aligned Field Guide, is fully realized and understood by all sub-grantees and contractors within the Weatherization network as well as by IHCD WAP technical staff. IHCD will continue to support efforts to position Indiana's WX Network to test for the national Energy Auditor Certification. INCAA has incorporated all components of WPN 17-7 into the Client Education course in addition to periodically offering a training course DOE WPN 17-7. Additionally, INCAA provides three SWS courses-SWS for Auditors/QCI, SWS for SHELL, and SWS for HVAC. The Semi-Annual Technical Trainings, Competency Maintenance Refresher, Semi-Annual Managers meetings courses are designed to specifically include addressing updates or changes in DOE, IHCD, SWS, Code, etc throughout each FY.

Percent of overall trainings

Comprehensive Trainings:	48.0
Specific Trainings:	52.0

Breakdown of T&TA training budget

Percent of budget allocated to Auditor/QCI trainings:	40.0
Percent of budget allocated to Crew/Installer trainings:	40.0
Percent of budget allocated to Management/Financial trainings:	20.0

V.9 Energy Crisis and Disaster Plan

IHCD will follow the guidance for Energy Crisis and Disaster Plan as outlined in WPN 12-07.

The primary allowance of this program notice would allow IHCD to install incidental repair measures as deemed necessary and in accordance with IHCD and DOE policy, appropriate and associated health and safety cost necessary for weatherization to continue, the ability to perform reweatherization without regard to the date of weatherization, and paying weatherization personnel to perform duties such as 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. However, using DOE funds to pay for weatherization personnel to perform relief work in the community as a result of a disaster is not allowable.

Incidental and health and safety related expenses are required to meet both DOE and IHCD guidelines. Incidental repair costs as outlined in NEAT/MHEA must be followed if the NEAT/MHEA audit is utilized.

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All actions taken in response to an energy crisis would be governed by WPN 12-07, 10 CFR 440.18 and require approval from IHEDA prior to engaging in any disaster related activity.