The Weatherization Assistance Program
Policy and Procedures Manual
2009
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INTRODUCTION AND OVERVIEW

The Weatherization Assistance Program (WAP) is administered through the Community Development Department of the Indiana Housing and Community Development Authority (IHCDA). Funding for the Weatherization Assistance Program comes from both the U.S. Department of Energy (DOE) and the Department of Health and Human Services (HHS). Beginning in 1993, Stripper Well Settlement funds were made available to supplement the services provided in weatherization. These monies were designated as the State Weatherization Efficiency Enhancement Program (SWEEP). It is likely that at the end of the 2009 program year SWEEP funds will run out and will no longer be available for Weatherization.

In 2009, the DOE funding will be coming from two different sources. The first is the annual federal budget allocation, given to Indiana, made available only to Community Action Agencies. The second is funding provided as a part of the American Recovery and Reinvestment Act. This funding is to be a temporary, massive increase in program funding and is available on a competitive basis to non-profit agencies throughout the state. Regulations under which these funds may be used are listed in 10 CFR Part 440. The weatherization funds from HHS are a percentage of the Low-Income Home Energy Assistance Program (LIHEAP) grant.

The purpose of the Weatherization Assistance Program is to provide energy conservation measures to the low-income population. In order to meet this need, the Indiana Housing and Community Development Authority contracts with local Weatherization sub grantees to administer WAP services. Sub grantees consist of non-profits and Community Action Agencies (CAA's) from around the state.

Agencies under contract to provide WAP services may use their own agency crews, or private contractors to provide energy conservation measures. In either case, the local administrator is ultimately responsible for the quality of workmanship and for the effectiveness of services supplied.

Within the framework of the federal regulations and state codes, Indiana has the flexibility to operate the Weatherization Assistance Program in a manner that is best for the low-income families in Indiana. Indiana gives much of that same discretion to sub-grantees administering WAP at the local level.

Each year, IHCDA must submit to DOE a State Plan for how the WAP will be administered within Indiana. The State Plan deals with adherence to federal regulations, production numbers, statistics for elderly and handicapped persons assisted, monitoring plan, budgets, and training and technical assistance dollars.

Since the State of Indiana is the grantee of DOE, it has the responsibility to ensure that services across Indiana have uniformity and that an applicant will be treated equitably in any service area of the state. The system that IHCDA employs to ensure quality of service is an extensive training and monitoring plan implemented with IHCDA staff. Each individual sub grantee is regularly monitored for compliance by a staff of monitoring personnel evaluating the agencies performance in the provision of the weatherization program.

SECTION 100

ELIGIBILITY AND APPLICATION

101 ELIGIBILITY DETERMINATION

The Weatherization Administrator, or its subcontractor, is 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 Administrator or any of its subcontractors.

An individual or family will be eligible for Weatherization assistance under the following definitions:

- A household with an income at or below 200% of the current OMB poverty income guidelines as approved by the Department of Health and Human Services, per 10 CFR 440.22(a)(1).
- A household with a TANF and/or SSI recipient during the twelve month period preceding eligibility determination, per 10 CFR 440.22(a)(2).
- A household that is eligible for assistance under the Low Income Home Energy Assistance Act of 1981, per 10 CFR 440.22 (a)(3).

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 for denial procedures and notice to appeal.

102 DOCUMENTING ELIGIBILITY

IHCDA requires that all sub-grantees maintain current copies of an eligibility determination. The client records must be available to IHCDA for program evaluation and monitoring purposes. Files of clients not categorically eligible through the Energy Assistance Program 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.

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 reserves the right to inspect client income verification to ensure client eligibility. Agencies must place photocopies of the most recent Energy Programs Application from EAP verifying categorical eligibility under 10 CFR 440.22 (a)(3).

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

- An application and eligibility determination is not required for shelters. Agencies should determine the number of countable completions based on shelter regulations detailing that a weatherization provider may count each 800 square feet of the shelter as a dwelling unit or each floor level as one unit, as noted in 10 CFR 440.22(f). An individual file should be kept for the shelter job. For reporting purposes, each completion should be counted as "Data Unavailable" when reporting income categories and demographics.
- In the weatherization of multi-unit buildings, DOE regulations require that 66% (50% for duplexes and four unit buildings) of dwelling units in the building must be eligible households or will become eligible within 180 days as referenced in 10 CFR 440.22(b). An application and eligibility determination are, therefore, not required for non-eligible or empty units. For reporting purposes, each non-eligible or empty unit should be listed as "Data Unavailable" when reporting income categories and demographics. To ensure that the percentage requirement is met, a separate list must be maintained, indicating the eligible and non-eligible or empty units.
- 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.

103 APPEALS PROCEDURE

When a Weatherization Administrator determines that a household is ineligible, the agency must provide a written denial to the client. Within ten working days of the application an ineligible household must be notified of the reason(s) for the denial and advised of their right to appeal the decision to the next level. Weatherization Administrators must retain in the household file a copy of the denial letter with the appeal procedure that was sent to the client.

IHCDA recommends that the "**Applicant Notification"** form found in *Appendix Q* be the basis of any form created by the Weatherization Administrator to notify weatherization clients of their denial for services.

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

1. Local review involves the written policy of each Weatherization Administrator for handling client complaints or appeals of program decisions. The final step in the local process should involve a written determination by the agency Executive Director.
2. State review occurs when a denied weatherization applicant is not satisfied with the local agency determination. The applicant appeal must be made in writing within thirty days of the local denial, to the assigned Weatherization Administrator Monitor and a Community Development Administrator. All pertinent material from the case

will be requested from the Weatherization Administrator by IHCDA personnel in order to make a determination.

3. Formal Appeal is available to an applicant who is dissatisfied with the preceding decisions. The Applicant may submit a written request for a formal hearing, within fifteen days of the date of the state notification. The request, which will be provided with state notification to the applicant, is to be sent to:

Community Development Supervisor
Indiana Housing and Community Development Authority
30 South Meridian, Suite 1000
Indianapolis, IN 46204

The Community Development Supervisor shall designate a hearing officer who has not participated in any prior decision with regard to the applicant.

The hearing officer will provide notice of the date, time and location of the hearing within thirty days of the written request. The hearing may be conducted in person, or by telephone.

The applicant shall have the opportunity to review all documentation submitted to IHCDA.

104 AMERICAN RECOVERY AND REINVESTMENT ACT

All Weatherization program administrators for the ARRA funds will be utilizing the 2008-2009 Energy Assistance Program rosters as their sole source of clients. Community Action Agencies will continue to serve as the intake site for new clients interested in signing up for the Weatherization program as those individuals will be served utilizing non-ARRA Weatherization funding.

SECTION 200

CLIENT FILES

201 REQUIRED FORMS

Client files must be kept in order to verify the work that has been completed and to track expenditures on each house. Agencies will be required to report completions and document which funding sources were used when more than one funding stream is utilized on any one dwelling. The documentation should detail the dollar amount of DOE, LIHEAP, ARRA and/or SWEEP funds spent on each home.

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. Required forms include:

- An approved, signed, and dated **Energy Programs Application** is needed in every weatherization file. The application must be active at the time the weatherization services are provided and at the time of final inspection. An application is considered active for a twelve month period starting from the date of the approved application. *Appendix A.*
- **Income documentation** verifying total household income for the twelve 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. Agencies must use a form or method of income calculation that is consistent with guidelines as written in the most current version of the Indiana Energy Assistance Program Operations Manual. Located in *http://www.in.gov/ihcda, Community Development, Energy Program, EAP Manual.* 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.
- **Appeal Notification** that is given to any deferred client should be noted in each weatherization file. The notification should detail the process described in *Section 103* of the manual.
- **Landlord/Rental Agreement** detailing Weatherization Administrator's rental policy, including minimum landlord contributions. The form must be signed by the landlord, client, and agency personnel.
- **Work Order** must be contained in each case file and must be specific to the housing type. The completed Work Order will contain relevant information about the work that was completed on the home. This **must** include the auditors findings and diagnostics results used to guide weatherization work. There are separate forms for site built homes and mobile homes. *Appendix J.*
- **Final Inspection Form** must contain the following information: the name of the client, the name and original signature of the auditor, the date of the inspection, client

signature, and a statement that the home is passing or failing the inspection. There should also be adequate space for comments on the quality of the work or other aspects of the job. If the client does not sign the final inspection form, the Weatherization Administrator must document the reason for the absence of the client signature. For example, a client who rents a home and moves before the final inspection can be completed and is therefore unavailable to sign the final inspection form. The Weatherization Administrator needs to document three written attempts to reach the client for signature, such as correspondence sent to forwarding address. If the client will not sign due to a lack of satisfaction with the work, the auditor should note client concerns. If work is done in a home and the auditor cannot return to conduct an inspection at any time in the process, the administrator must take the aforementioned steps to contact the client. If the client is unreachable, the administrator must contact the Weatherization Program Administrator at IHCDA and request approval for an alternate final inspection.

- **Smoke Detector Release of Liability** detailing that smoke detectors were in working order when installed. This information has been combined with the Client Release of Liability and must be signed off on before work can begin on the home. *Appendix I.*
- **Heating System Form** should be filled out during the initial inspection of the system on every home. The appropriate document should be utilized depending on heating system type. Forms may be found at www.incap.org/weatherizationforms.html.
- **Furnace Sizing Form** is to determine the proper heat load calculation when a new furnace is to be installed in the home. Also referred to as a Manual J. This form must be completed and placed in every file for a home in which a furnace is replaced. Forms may be found at www.incap.org/weatherizationforms.html.
- **New Furnace Installation Inspection** is to be used only when a new heating system has been installed. The purpose of this tool is for auditors to follow a step by step process to evaluate if the new heating system has been installed properly and is running efficiently. *Appendix H.*
- **Gas Cook Stove Form** documents the working condition of this appliance, if it is present. Any information regarding the appliance condition, operation, or repair should be noted on this form. *Appendix K.*
- **Indiana Wx Gas Appliance Inspection Guide** lists the procedure for surveying all gas appliances in a household for proper venting and combustion levels. This form provides a flow chart process for both the heating technician and inspector to follow. *Appendix L.*
- **Lead Paint Hazards Notification** requires that a weatherization client receive written explanation of the dangers of lead-based paint in the form of the EPA booklet, "Renovate Right: Important Lead Hazard Information for Families, Child Care Providers, and Schools". It is mandatory that the client receives the booklet and initials the form in written acknowledgment of its receipt before weatherization work can begin on the home. This booklet can be found by going to the EPA's website This information is combined with the Client Release of Liability. *Appendix I.*
- **Client Release of Liability** provides a waiver given by the occupant/owner of the dwelling to the local Weatherization Administrator providing weatherization services. All files **must** contain this form and releases for smoke detectors, lead, and mold have been incorporated. *Appendix I.*

- **Indiana Moisture Assessment** lists moisture conditions that exist in the home at the time of initial audit before any weatherization measures were installed. This form must be present in every file in compliance with DOE Program Guidance 05-1. *Appendix M.*
- **Mold Hazards Notification** requires that a weatherization client receive written notification of the potential health risks of mold and high moisture levels in the form of the EPA booklet, "Mold, Moisture, and Your Home". This information has been combined with the Client Release of Liability and this notification must be signed before any work can begin on the home.
- **Refrigerator Protocol Form (ONLY APPLICABLE TO AGENCIES RECEIVING LIHEAP)** requires auditors to test the primary refrigerator in the home for a minimum of two hours and document the consumption. Must be used in determining whether the refrigerator should be a candidate for replacement. Forms may be found at *www.incap.org/weatherizationforms.html*

PLEASE NOTE: If an employee of an administrator is applying for assistance through the Weatherization program, a note must be included in the file indicating that the Executive Director has reviewed and approved their application.

SECTION 300

SERVICE PROVISION

301 CLIENT PRIORITIES

Once eligibility has been determined, the agency client priority policy must be followed. Each Weatherization Administrator will develop written procedures by which it assigns priority to each household. Federal regulation 10 CFR 440.16(b) states that priority should be given to households that contain:

- Elderly (age 60 years and older) or Disabled (as defined in Indiana Energy Assistance Program Operations Manual)
- Children, which Indiana defines as age 18 and under
- High residential energy users or those families with a high energy burden

Agencies are encouraged to use the Energy Assistance Program's designated number of matrix points as a first-level sort for client service. The matrix score already incorporates points for households who meet the "At-Risk" criteria of being Elderly, Disabled, or having Children.

302 REQUIRED ACTIVITIES FOR WEATHERIZATION

Indiana uses priority lists for both site built and mobile homes based on measures specified by the National Energy Audit (NEAT). There are three activities that must be completed on every home weatherized and each is listed below.

1. Health and safety measures must be completed in order to ensure the security of the occupants and of the weatherization personnel working in a home.
2. General heat waste reduction activities in order to increase energy efficiency of the dwelling and to reduce the household energy burden.
3. Client education provides the occupants with the information and tools they need in order to protect the weatherization materials installed. Education also offers clients the ability to actively participate in saving energy in their homes.

Each home must follow the designated measures on the respective priority list unless a NEAT or Mobile Home Energy Audit (MHEA) is run on the home and the measures applied to the home follow the NEAT or MHEA priority.

For the technical aspects of each category, as well as the priority lists, please refer to the Indiana Weatherization Field Guide, Chapter 2, Building Model.

303 RENTAL PROCEDURES

The benefits of weatherization to the occupants of rental units are protected in accordance with 10CFR440.22(b)(3). Indiana's policy for the weatherization of rental units complies with 10CFR440.16(i), and all other pertinent regulations.

Sub-grantees are required to have written policies detailing the terms of the landlord/tenant agreement and any landlord contribution policy the agency 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. Furthermore, agencies will ensure that clients realize the primary benefits from the weatherization work.

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 agency, 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.

Landlord contributions are not to be counted as program income, but must be applied to the program in one of two ways.

- 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.
- Agencies that do not require landlord contributions, but receive contributions without stipulations as to their use, must then use those funds to enhance the weatherization program.

Program income or contributions by landlords, utility companies, or other organizations are considered as leveraged resources and must be reported to the Energy Assistance Program for use in completing the leveraging report.

Agencies are required to develop a written appeals process for dealing with rental units. The process should be available to resolve disputes over raising rent following the weatherization process.

The primary purpose of the weatherization program is to lower the total residential energy expenditures of low-income persons. Agencies are to ensure that no undue enhancement shall occur to increase the value of the dwelling units, as noted in 10CFR440.22 (b) (3)(iv).

Agencies 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. Agencies must be aware of the legal protection available and be prepared to make appropriate referrals when necessary.

304 NEW CONSTRUCTION

Under no circumstances should weatherization funds be used on new construction buildings.

305 ENERGY EDUCATION

Client education is a mandatory measure under the audit priority list in Indiana. It is also an opportunity to provide the tools for lasting energy savings. Indiana has a required energy education curriculum and IHCDA provides numerous sources of information to agency personnel, including guides, brochures, and booklets to use as aides while conducting energy education. Auditors should familiarize themselves with the Client Education curriculum provided in Exhibit B and should be providing to clients the forms identified on the release of liability as well as the brochure “Protect Your Family from Lead in Your Home”.

Knowledge about energy use and basic concepts behind energy conservation should be shared with a household during the initial client intake and continue throughout the weatherization process. This continuous process enables occupants to see how their home acts as a system, their effect on that system, and how measures performed will keep them safe and comfortable. Any Weatherization Administrator providing client education for Energy Assistance should be advised that unless the approved weatherization curriculum, “In-Home Energy Guide”, compiled by Kerage, Belshe, and Kloepfer, is used for instruction, the class will not be sufficient for the purposes of energy education for WAP.

306 FINAL AND INTERIM INSPECTIONS

Each sub grantee is required to complete an interim inspection on every home which received mechanical repairs or replacements. An interim inspection is an evaluation of the mechanical work completed. This includes interim inspection includes completing either the New Furnace Installation Inspection form or the post column of the respective Heating System Evaluation form depending on measures performed. This evaluation can either be completed by a trained auditor or BPI certified Heating Technician.

It is recommended that the interim inspection, whenever possible, be done on the last day the mechanical contractor is in the home. This prevents trying to access the home without a contractor present to make any necessary changes or repairs.

Each sub-grantee or its authorized representative is required to complete a pre and post inspection of each unit receiving weatherization measures. A dwelling unit may not be reported as completed until it has passed a final inspection, according to
10 CFR 440.16(g). The final inspection certifies that the work was completed in a competent and professional manner, and in accordance with the approved procedures, that measures installed have yielded diagnostic improvements, and that all materials have been properly installed per 10 CFR 440.21.

In the event that a dwelling cannot be entered for final inspection, the client file must contain documentation of why the final inspection was not completed under normal circumstances and that an alternate final inspection was conducted and approved, in writing, by IHCDA. Multiple documented attempts must be made before the Weatherization Administrator can request an alternate final inspection. At a minimum, three verifiable attempts should be made to schedule a regular final inspection.

An alternate final inspection will be allowable in rare circumstances and only if the Weatherization Administrator can establish a justifiable reason for the request. This alternative may include visual inspection with an infrared camera of the outside of the unit or other techniques as necessary to ensure that measures have been completed properly.

Before a dwelling with an alternate final inspection can be counted as a completion, the Weatherization Administrator must submit a written request for approval to the assigned agency monitor and a Community Development Administrator. The request should detail the specific circumstances relating to the issue and why access to the dwelling has been denied. All appropriate documentation, such as letters to the client, should be included with the request. IHCDA staff will have fifteen business days to respond in writing to approve or deny the request for an alternate final inspection or to request additional information. Until the written approval from IHCDA is received, final claims cannot be submitted for the unit, nor can the dwelling be counted as a completion.

It is recommended that Weatherization Administrators, whenever possible, complete the final inspection process on the last day that contractors or crews will be in the dwelling, as this eliminates the need to gain access to the unit after services have been rendered.

307 REFRIGERATOR PROTOCOL (ONLY APPLICABLE TO AGENCIES RECEIVING LIHEAP)

The weatherization program may replace an inefficient refrigerator in an owner-occupied home or, in limited circumstances, a rental unit. Refrigerators must be metered to determine energy consumption as part of the audit process; replacement units will be provided if metering proves that replacement is cost effective and within the priority system. Weatherization Administrators must consider the Savings to Investment Ratio (SIR) of replacement refrigerators with any utility monies or other funding streams that are available to offset the replacement cost.

Refrigerator replacement for shelters will be considered on a case-by-case basis. The agency must submit a written request to the Weatherization Administrator Monitor with testing data from the shelter units and a written response for approval must be obtained before the refrigerator can be replaced in a shelter.

Any agency wanting to provide refrigerator replacements to renters who own their refrigerators must amend the agency's written rental policy to address this issue. Once the rental policy has been changed to include refrigerator replacement, written approval from the assigned monitor must be received before refrigerators are provided to rental units.

Guidelines for replacement are as follows:

1. The refrigerator to be replaced must be the primary unit used by the household. In homes where more than one refrigerator is used, the Weatherization Administrator or their designated auditor should educate the client about the energy cost involved with the operation of a second refrigerator and encourage the disposal of this second unit.
2. All refrigerators that are removed from the home must be empty and ready for disposal upon delivery of the replacement refrigerator. The old unit must be permanently taken off the grid and disposed of in accordance with The Clean Air Act, USC Title 42, Section 7671(g). Agencies using a private contractor for this process must obtain a copy of the Indiana Department of Environmental Management license to handle refrigerants and must monitor the contractor for compliance.
3. Any replacement refrigerator installed must be Energy Star rated. Agencies may contract with a vendor besides Whirlpool, but the vendor must meet the same specifications for cost, delivery, set-up, removal, and disposal of old refrigerator. Replacement refrigerators may not contain advanced options, such as ice makers.

The protocol form, instructions for determining the Savings to Investment Ratio (SIR), and refrigerator replacement sizing is detailed in the Indiana Weatherization Field Guide, Chapter 2.

308 LEAD-SAFE WORK PRACTICES

IHCDA is committed to ensuring that Indiana's Weatherization Program will:

1. Protect Weatherization Administration employees, their families, and residents of homes being weatherized from lead poisoning;
2. Comply with the new Housing and Urban Development (HUD)[1] and Environmental Protection Agency (EPA) regulations[2] as well as long-standing Occupational Safety and Health Administration (OSHA)[3] and other regulations[4] regarding lead-based paint; and
3. Reduce the likelihood that someone may claim that weatherization work resulted in lead poisoning.

IHCDA believes that this policy will have a minor impact on the extent of weatherization services provided by the agency. Only in unusual situations will a weatherization service that would otherwise be conducted be stopped because of lead-based paint hazards. IHCDA believes that Community Action Agencies can maintain this high level of weatherization service by making extensive and regular use of the x-ray fluorescence (XRF) equipment that IHCDA has provided to each agency. The XRF will allow the Building Analyst to quickly and accurately determine where lead-based paint and lead dust hazards are in the home and design projects to avoid generating problems. By taking time initially to identify the location of lead-based paint and carefully designing the weatherization work, most weatherization projects can continue without the use of extensive and costly lead-safe work practices.

This policy consists of nine parts:

I. Special Requirements for HUD-Assisted Property
II. Project Design
III. Lead-Safe Work Practices
IV. Training
V. Deferral of Weatherization Services
VI. Liability Insurance
VII. Funding Considerations
VIII. XRF Management
IX. Glossary

Appendix A: Sample Hazard Reduction Completion Notice Format
Appendix B: Flow Chart to Make Decisions to Safely Manage Lead-Based Paint Hazards

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[1] 24 CFR Part 35
[2] 40 CFR Part 745
[3] 29 CFR 1926.62. See also 29 CFR Part 1910 Subpart I regarding personal protective equipment.
[4] 327 Indiana Administrative Code 23

Appendix C: Model OSHA Written Compliance Plan for Indiana Weatherization Projects

I. Special Requirements for HUD-Assisted Property

The U.S. Housing and Urban Development (HUD) have adopted residential lead-based poisoning prevention rules. These rules were generally effective on September 15, 2000. However, the latest compliance date was January 10, 2002.

The rules do not apply to weatherization projects when any one of the following six conditions are met:

1) Residences built after 1977;
2) Owner or occupant provides agency with a copy of an inspection report signed by a **lead inspector or risk assessor licensed by the Indiana Department of Environmental Management (IDEM)**[5] that indicates no lead-based paint is present;
3) The amount of disturbed lead-based paint is less than following de minimis thresholds:
   a) For interior surfaces, either two square feet per room or 10% of a small component such as a baseboard, window sill, or window sash;
   b) For exterior surfaces, 20 square feet;
4) Residence is not HUD-assisted housing (including **HUD Section 8** voucher housing);
5) HUD funds are not being used to **weatherize, rehabilitate, or repair** the residence; or
6) Residence is designated exclusively for the elderly or disabled.

If any one of these six conditions is true, then the HUD rule does not apply. The standard requirements described in the other sections of the policy must be followed. In general, for those homes that fall within the HUD rule, the lead-safe work practices described later in this policy will ensure compliance with the HUD rule. However, HUD requires that these additional precautions be taken:

1) **Clearance Examination:** When the weatherization work is completed, the owner and occupants may not reenter the work area until the agency has a clearance report signed by an IDEM-licensed risk assessor or inspector. If the work area includes a bedroom, bathroom, or kitchen, the housing may not be entered until one of the following signs a clearance report:
   a) An Indiana-licensed lead inspector;
   b) An Indiana-licensed risk assessor;

[5] While this policy refers to an IDEM-licensed inspector, risk assessor, supervisor or worker, there are circumstances where an EPA or out-of-state license may be sufficient. The person may have been licensed before Indiana's program was effective on March 1, 1999. If you have questions call IDEM at 800-451-6027 and ask for the lead licensing program.

c) A trained clearance examiner or sampling technician supervised by an Indiana-licensed lead inspector or risk assessor; or
d) A clearance examiner or sampling technician licensed by another state such as New Hampshire.

In interior areas, the clearance exam requires dust wipe samples of window sills and floors for each room disturbed plus adjacent rooms plus at least one blank. Currently, these samples must be sent to an EPA-approved lab for analysis. It often takes two days to get the results back.

2) The inspector or risk assessor must analyze the dust wipe samples with both the NITON XRF to ensure the work was done properly and the EPA-approved lab to comply with HUD regulations. Residents will be allowed to reenter their residence when the NITON XRF dust wipe measurements show that clearance has been achieved. If the lab results later show that clearance was not achieved, the residents must be moved out of the home and the residence recleaned. In this situation, the occupants will not be allowed to reenter until the lab confirms clearance has been achieved. IHCDA encourages Weatherization Administrations to use margin of error when cleaning a unit based on the NITON XRF.

3) **Trained Workers:** All workers on the site must be either:
a) Licensed by IDEM as a worker or supervisor;
b) Supervised by an IDEM-licensed lead supervisor; or
c) Trained at a HUD-approved training course (see training section).

4) **Hazard Reduction Notice:** Occupants must receive a special "Hazard Reduction Activity" notice within 15 days after the work is completed. A sample form is provided in Appendix A of this policy. Community Action Agencies are encouraged to provide this notice on all projects.

II. Project Design

Weatherization Administrators shall consider lead-based paint issues on all weatherization projects. Unless the agency knows that the residence is built after 1978 or knows that lead-based paint is not present in the residence[6], the agency must determine what weatherization services should be provided for a residence in one of two ways: either presume the paint is lead-based paint or test the paint to determine whether it is or is not lead-based paint. While anyone can make the presumption, only an IDEM-licensed inspector or risk assessor[7] may determine whether paint is or is not lead-based paint. The

[6] The only legal method that an agency may know that a residence built before 1978 does not contain lead-based paint is through a report signed by an IDEM-licensed inspector. That report must be provided to the owner and occupant of the residence. The owner must provide future tenants and/or buyers of the residence with a copy of the report.
[7] See footnote #5 above

NITON XRFs provided by IHCDA are the key instrument used to make this determination.

If the paint is assumed to be lead-based paint, any work that disturbs more than minor (de minimis) amounts of paint must be done using a full-set of lead-safe work practices. If the paint is not lead-based paint, the agency may not be making the most efficient use of weatherization funds or providing all appropriate weatherization services. In practice, the agency will not be able to do any interior work that disturbs lead-based paint.

Weatherization Administrators may choose which approach to take on a particular residence. However, IHCDA strongly encourages the agencies to use the XRFs. In most cases, they will reduce the overall cost of the project by avoiding the unnecessary use of lead-safe work practices. In addition, the owner and occupants, as well as future owners and occupants, will know where the lead-based paint is so they can take appropriate precautions.

When lead-based paint is present, IHCDA has made the following determinations regarding the cost and need for lead-safe work practices:

1) **Minor Paint Disturbance**
Some lead-safe work practices must be used whenever lead-based paint is disturbed. The work practices generally consist of wetting down paint to be disturbed and cleaning up when completed. However, when more than de minimis threshold amounts of lead-based paint are disturbed,[8] a complete set of lead-safe work practices must be used.

2) **Exterior Paint**
Lead-safe work practices on exterior paint should be reasonable and modest as long as a child's regular play area is not near the work. A dust wipe sample is not needed on exterior work and special precautions to protect the floor and furniture are not needed. Because of the likelihood that the paint disturbance will exceed 20 square feet, it is generally better to always plan to use the full set of work practices.[9]

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[8] The de minimis threshold amounts for interior areas are 2 square feet per room or 10% of a single component. When determining how much paint must be disturbed, only the paint that will be chipped, scraped, broken, or removed from the substrate must be considered. However, caution must be used when estimating the amount of paint to be disturbed. More paint may come off than anticipated. If this happens, you may inadvertently violate the HUD rule and you would need to immediately stop the work and upgrade the safe work practices. If the window sash does not have any deteriorated paint, you may presume that replacing a broken window will not exceed the de minimis threshold.

[9] Presume that removing siding will disturb more than 20 square feet of lead-based paint.

3) **Interior Paint**
The full set of lead-safe work practices on interior areas are too costly unless the room is not carpeted and either the furniture can be easily removed or easily covered and cleaned. The potential for water damage and/or extensive clean up is too significant. Often, this limits work to a bathroom, kitchen or hallway. In all cases, the number of rooms and the amount of paint disturbed should be kept to a minimum.

If the agency chooses to use an XRF to identify and safely manage lead-based paint, the agency should use the following procedure to determine how best to provide weatherization services. See Appendix B for a flow chart that provides a graphical representation of these steps and the decisions to be made.

Step 1 Determine If Problem Might be Present

1) Ask if a resident of the home has been identified as being lead poisoned[10] while living in the home. If the answer is yes, proceed with the inspection but coordinate with the local health department before disturbing any paint.[11]
2) Presume that lead-based paint is present unless one of the following conditions apply:
   a) The residence was built after 1977; or
   b) The owner or occupant provides the analyst with a copy of an inspection report signed by a **lead inspector or risk assessor licensed by IDEM** that indicates no lead-based paint is present;
3) If lead-based paint is present or presumed to be present, assess whether the paint is seriously deteriorated (i.e. that a workman's presence just walking around the residence is enough to stir up lead-based paint laden dust residues). The XRF should be used to determine the amount of lead in the dust using a dust wipe sample; and
4) If the lead-based paint is seriously deteriorated, defer all weatherization work, document your decision, recommend that children in the home get a blood lead test, and contact local health department for guidance. Otherwise, go to Step 2.

Step 2 Assess the Extent of the Problem

1) Identify where paint may need to be disturbed;
2) Use an XRF to determine if the paint is lead-based paint;
3) Document results for owner and occupant of residence in a signed inspection report per IDEM requirements; and
4) Decide how to proceed:
   a) If no lead-based paint is found, go to Step 6 item 1) below and continue with full weatherization services; and

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[10] Lead poisoning means the child younger than 7 years old has a blood lead level of more than 10 ug/dL.

[11] You may also choose to perform a full risk assessment to assist the family and the health department. However, weatherization funds may not be used for the extra labor involved.

b) If lead-based paint is found, ensure that work on furnace includes the use of a HEPA vacuum to collect any dust that must be disturbed and that the filter is put in a plastic bag for disposal, then go to Step 3.

Step 3 Avoid Disturbing Any Lead-Based Paint

1) Identify options to provide the service without disturbing lead-based paint;
2) Determine whether an option can achieve the full weatherization benefits with no loss in effectiveness;
3) If a practical option exists, go to Step 6 and implement that option using only those lead-safe work practices that the building analyst who is a licensed risk assessor determines may be needed to avoid disturbing lead-dust; and
4) If a weatherization service cannot practically be done without disturbing lead-based paint, then go to Step 4.

Step 4 Disturb Only Exterior Paint

1) Identify options to provide the service by disturbing only exterior lead-based paint;
2) Determine whether a child's regular play area that consists of a porous surface such as sand, soil, or grass is within five feet of paint to be disturbed;
3) If such a play area is found:
   a) Ensure that the play area is more than five feet from the paint to be disturbed; and
   b) Recommend to the occupants that the play area be moved away from any lead-based paint (whether weatherization work is done or not);
4) Determine whether an option can achieve the full weatherization benefits with no loss in effectiveness;
5) If a practical option exists, go to Step 6 item 1) and implement that option using <u>exterior</u> lead-safe work practices identified in Section III below; and
6) If a weatherization service cannot practically be done without disturbing only exterior lead-based paint, then go to Step 5.

Step 5 Narrow the Scope of Interior Lead-Based Paint Disturbance

1) Identify options to do the project by disturbing:
   a) As little interior lead-based paint as possible – with the goal of getting the disturbance less than two square feet overall and less than 10% of an interior component of interior lead-based paint; and
   b) Interior lead-based paint in uncarpeted rooms that have:
      i) Few items of furniture;
      ii) Furniture that can be easily moved; or
      iii) Furniture that has hard surfaces that can be easily cleaned;
2) Determine whether an option can achieve the full weatherization benefits with no loss in effectiveness;
3) If a practical option exists, go to Step 6 and implement that option using <u>interior</u> l lead-safe work practices identified in Section III below in as few rooms as possible and:
   a) Take and analyze dust wipe samples (and required blanks) from a window sill

and floor in each room where paint is being disturbed and in each adjacent room using EPA procedures; and

4) Providing renovation notice to the owner and occupants as required by EPA (see Step 6, item 2); and
5) If a weatherization service cannot practically be done without disturbing less than two square feet of interior lead-based paint or less than 10% of an interior component in carpeted rooms with many pieces of furniture that cannot be easily moved or cleaned, then do not provide the specific weatherization service.

Step 6 Provide Notices to Owner and Occupant

1) **Lead Inspection Report:** Whenever an XRF is used:
   a) Prepare a lead inspection report summarizing the results of the XRF tests;
   b) Sign the copy (must be done by an IDEM-licensed inspector or risk assessor);
   c) Give a copy of the lead inspection report to the owner and adult occupant of the residence; and
   d) Tell the owner that the owner must provide a copy of the report to future tenants and buyers.
2) **Notice of Renovation**: Whenever more than two square feet of interior painted surface on a single component may be disturbed when providing weatherization services:
   a) Give an EPA Pamphlet entitled *Protect Your Family From Lead In Your Home*, to the owner <u>and</u> adult occupant of the residence by certified mail between 5 and 60 days before the work begins or in person less than 60 days before the work begins;
   b) If the EPA Pamphlet is delivered in person, obtain a written acknowledgement from the owner and adult occupant[12] that each has received the EPA Pamphlet on a form that says:

Acknowledgment of Receipt of EPA Pamphlet

"I have received a copy of the pamphlet, Protect Your Family From Lead In Your Home, informing me of the potential risk of lead hazard exposure from renovation activity to be performed in my dwelling unit. I received this pamphlet before work began.

Address of Unit Undergoing Renovation: _____

_____	_____	_____
Printed Name	*Signature*	*Date*

   c) If lead-based paint in a common area for multiple residences is disturbed:
      i) Provide a notice to each resident describing the:

[12] EPA provides alternatives when an adult occupant is unavailable or refuses to sign. See 40 CFR 745.88. If this occurs on weatherization projects, it is better to work through the issues than proceed without a written acknowledgement from the occupant.

(1) General nature and locations of the planned renovation activities;
(2) Expected starting and ending dates; and
(3) Statement of how the occupant can obtain the EPA Pamphlet, at no charge, from the renovator;

ii) Prepare, sign and date a statement describing the steps taken to notify all occupants and to provide the pamphlet; and

iii) Revise notice if scope, locations or dates change before the changes occur.

d) Prepare an OSHA Compliance Plan using the model in Appendix C.**III.**

Lead-Safe Work Practices

Weatherization Administrators shall use the following lead-safe work practices whenever known or presumed lead-based paint is disturbed. Please note that additional work practices are required when the work is covered by the HUD rule (see Section I for more information). In all cases where lead-based paint is disturbed, an OSHA Compliance Plan for Indiana Weatherization Projects consistent with Appendix C must be prepared and signed. The Building Technician Crew Leader is responsible for ensuring that these work practices are followed:

1) **General:** When any lead-based paint is disturbed:

a) Tell the occupants to stay out of the work area;

b) Ensure that workers can wash their hands and face when leaving work area;

c) Ensure that workers do not smoke, eat, drink, chew tobacco or gum, or apply cosmetics in the work area;

d) Wear a respirator or dust mask[13];

e) Obtain a Ground-Fault Circuit Interrupter (GFCI) if electrical equipment will be used;

f) Do not use any of the following methods to remove the paint:

i) Open-flame burning or torching;

ii) Machine sanding or grinding without high-efficiency particulate air (HEPA) local exhaust control;

iii) Abrasive blasting without HEPA local exhaust control;

iv) Heat guns at temperatures above 1100°F for charring the paint;

v) Dry sanding or dry scraping except:

(1) In conjunction with heat guns (low temperature)
(2) Within 1.0 ft of electrical outlets; or
(3) When treating defective paint spots totaling no more than:

[13] A respirator is not needed to do the work. If one is used it should be a NIOSH-approved half-mask negative pressure air purifying respirators equipped with N100 or P100 (HEPA) filters.

(a) 2 sq. ft. in any one interior room or space or 10% of a small component; or

(b) 20 sq. ft. on exterior surfaces; and

vi) Paint stripping in a poorly ventilated space using a volatile stripper that is a hazardous chemical under OSHA as applicable to the work.

g) Lightly spray the paint with water[14] before disturbing it. Try keep it wet and use wet sanding/scraping methods whenever disturbing the paint;

h) If equipment is going to be reused, wash it thoroughly before leaving residence;

i) Dispose of all lead-based paint, debris, coveralls, and plastic covering in regular trash; and

j) Dispose of all water contaminated with lead-based paint in a sanitary sewer system.[15]

2) **Minor Paint Disturbances:** When less that 2 square feet per room or 10% of an interior component of lead-based paint is disturbed inside or less than 20 square feet of lead-based paint is disturbed outside:

a) Follow general requirements described in item 1) above;

b) Tape a plastic bag or sheeting on the horizontal surface below the paint to collect paint chips and any dust that may be formed; and

c) After work is done, wipe the surface with a baby wipe or towel.

3) **Exterior Paint Disturbances:** To be used when more than 20 square feet of exterior lead-based paint is disturbed. Generally, removing siding from a wall is presumed to disturb more that 20 square feet of lead-based paint unless it is known beforehand that deteriorated lead-based paint and lead dust is not behind the siding.

a) Follow general requirements described in item 1) above;

b) String barrier tape saying “WARNING” or “DANGER” or “DO NOT ENTER” at least five feet beyond area where lead-based paint will be disturbed;

c) Post OSHA warning signs near the exterior work so it can be easily read from 20 feet away from the edge of the exterior worksite.[16]

d) Ensure that everyone who enters the work area wears plastic coveralls, shoe covers, and hair covering and removes them when leaving the work area;

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[14] A material other than water such as shaving cream may be used to control the dust and debris.

[15] While septic systems may be used for the water, it is better to absorb the water onto paper or other adsorbent and dispose of it with the other trash.

[16] The sign must say “WARNING / LEAD WORK AREA / POISON / NO SMOKING OR EATING.” If the occupant’s primary language is not English, the sign must, to the extent practicable, be posted in the occupant’s primary language.

e) Seal any windows, doors, dryer exhausts or other openings in the work area;
f) Either remove or cover any equipment in the work area with plastic sheeting;
g) Place six-mil thick plastic sheeting[17] on wall below the paint to be disturbed and on the eight feet from the wall in a manner that it captures the water (15 feet if disturbed paint is on the second floor);
h) Place a 2" x 4" board or similar device along the outer edges of the plastic to capture water;
i) Wash off any siding that is removed;
j) Repair any deteriorated paint and fix cause of deterioration;
k) Remove plastic, clean-up any debris, and dispose in trash so that no deteriorated paint and visible paint remains.

[17] The sheeting may be porous and allow water but not paint chips to pass through it.

309 HEALTH AND SAFETY

The following is based on the Indiana Health and Safety Plan as detailed in the 2009 DOE State Plan and incorporated here as part of the Policies and Procedures Manual. For the technical aspects of the following policies, please refer to the Indiana Weatherization Field Guide.

Grantee Health and Safety

Agencies performing weatherization services will be cognizant of the possible dangers within a home. All agencies performing weatherization services must include in their written weatherization policy and procedure how the agency will address health and safety issues. The energy auditors will identify any hazards present in a home. The energy auditor will determine whether the contaminant poses a health danger to occupants, crews, or contractors. If not, the contaminant may be addressed as necessary minor incidental repairs. If the contaminant does pose a danger, the energy auditor will defer any weatherization measures until such time that the danger is eliminated. The agency will develop a reporting mechanism to ensure that the contaminant is reported to the appropriate agency.

Agency and IHCDA staff that go into client homes as part of their work responsibilities receive necessary training on health and safety issues that may affect them and the individuals and families that they are serving. Staff will be equipped with appropriate diagnostic tools to determine what conditions may be present and what may pose potential health and safety risks. Costs of training will be charged to state administrative or training and technical assistance line items.

Crew and/or Contractor Health and Safety

Local agencies will comply with all OSHA requirements in any weatherization activity. Detailed specifications regarding worker health and safety are found in OSHA 29 CFR 1926/1910 published by the U.S. Department of Labor. All Weatherization crews and contractors will utilize personal safety equipment and follow safety precautions as taught by INCAA, IVY Tech, and AC/C Tech. Each of these respective instruction groups covers: what safety equipment is necessary, how to utilize safety equipment, and the use of related equipment including, but not limited to ladders, respirators, and diagnostic gauges. In addition, courses for agency staff and contractors are available on a quarterly basis covering the topics of CPR and First Aid and Safety Management Programs covering OSHA guidelines and safety equipment.

Sub grantees, their delegates, and contractors are expected to comply with OSHA standards and costs associated with compliance should be included in the job cost.

Client Health and Safety

As homes are weatherized and made tighter, the problems associated with indoor air quality increase. Problems with indoor air pollutants, such as molds, exacerbate. Tightening a home can be especially dangerous if combustion appliances are improperly working or installed. For these reasons, the Indiana Weatherization Program is committed to ensuring the health and safety of all clients whose homes are weatherized. To accomplish this, a health and safety evaluation is required on each home prior to any work being started. The health and safety budget category can be charged to complete the evaluation and costs associated with eliminating energy related health and safety hazards. LIHEAP and SWEEP funding can also be used to eliminate Health and Safety hazards prior to beginning energy efficiency upgrades.

Weatherization activities will be done in a manner that will not subject staff or clients to health and safety risks. The Indiana Weatherization Field Guide, provided to all agencies, describes detailed instructions that must be followed in conducting health and safety inspections and testing.

Potential Hazard Considerations

The Indiana Weatherization Field Guide describes policies and procedures for remediation of potential hazard conditions.

Biologicals

The removal of biologicals, such as mold, vermin, and unsanitary conditions is not generally an allowed activity under the Weatherization Assistance Program. DOE program funds up to $500 for incidental repairs may be used to correct energy-related conditions to allow effective weatherization work and/or assure the immediate or future health of workers and clients.

Moisture and high indoor humidity can encourage the growth of many biologicals. Local agencies must ensure appropriate indoor humidity levels and inspect for potential sources of excess moisture. Identified problems and sources are documented on the Moisture Assessment Findings form that is signed by the building auditor, shell crew, client and/or landlord. Solutions and educational talking points are discussed with homeowner and/or occupants to determine roles in elimination of problems and/or mitigation. Occupants are given a copy of the Environmental Protection Agency (EPA) brochure, "A Brief Guide to Mold, Moisture, and Your Home" as part of the client education process. Staff will also ensure that the work scope development addresses and mitigates identified moisture related issues and that the appropriate funding source is being charged for such activity.

Effective 4/1/05, all CAAs are required to include a Client Consent Form with Release of Liability and Waiver of Claims in all client files. This notice explains to the client that the health and safety of the building, the occupants, or the weatherization staff shall not be compromised by any retrofit material, technique, or practice. To ensure health and safety, relevant assessments will be conducted as part of all building analysis and notification to the client that some weatherization measures may create dust or airborne

particles, including but not limited to: insulation, mold, or lead. Weatherization measures installed will either alleviate or not promote the growth of new airborne particles.

Mold awareness and assessment is a specific class and is a component of the following classes offered on a quarterly basis by Indiana Community Action Association (INCAA) to local agency staff and contractors:

Air Sealing for Building Technicians
Insulating Site Built and Mobile Homes for Building Technicians
Basic Heating Systems for Heating Technicians
Intermediate Heating Systems for Heating Systems
Advanced Heating Systems for Heating Technicians
Worst Case Draft for Building Analysts and Heating Technicians
Daily Safety Test Out Procedures
Oil Furnace Training
Boiler Inspection
Whole House Heat Load Calculations
Introduction to Infrared Thermography
Lead Safe Work Practices
Mold Awareness
Optimizing Weatherization Program Resources
Introduction to NEAT Software

IHCDA provides sub-grantees with training on moisture, ventilation, and indoor air quality issues. Client education is also used to address occupant's role in moisture problems. If necessary, WAP services may be delayed until the problem can be referred to another agency that can take remedial action (see Deferral Standards).

The Weatherization Assistance Program is not a mold remediation program. The use of DOE funds for removal of mold and other related biological substances is not an allowable weatherization expense. DOE funds should not be used to test, abate, remediate, purchase insurance, or alleviate existing mold conditions identified during the audit, the work performance period, or the quality control inspection.

Combustion Appliances and Combustion Gases
Health and safety activities are defined as activities that eliminate hazards aggravated or caused by the installation of weatherization measures. These activities include all combustion appliances in a home. Combustion appliances and combustion gases, as noted by DOE in Weatherization Program Notice 02-5, "pose the most serious hazard found in homes." Dealing with combustion gases in the home may require changing or repairing the venting on the appliance, or replacement of the cooking stove, water heater, furnace or space heater. Agency personnel receive extensive training in the evaluation of combustion appliances as well as air quality hazards. Evaluation forms are required to be on file. Measurement and careful consideration of the air leakage rate of the dwelling unit prior to, and during the course of air sealing, are important steps in this process. Agencies must consider the costs associated with eliminating health and safety hazards,

keeping in mind that the primary focus of weatherization activities must remain energy conservation.

The health and safety inspection includes the following items:

1. The rated and measured BTU input of each gas furnace;
2. The fuse size and type;
3. An inspection for gas leaks on all gas appliances
4. An inspection for spillage and a reading of the draft of furnaces and water heaters
5. A visual check for flame interference;
6. A test of the setting and operation of the limit control switch
7. An evaluation of the adequacy of combustion air for combustion appliances
8. A check that there are no open return air ducts in the furnace room
9. Carbon monoxide testing of all gas appliances;
10. Check for a properly installed temperature and pressure relief valve on the water heater
11. A measurement and adjustment, if needed, of the water temperature;
12. An inspection, and replacement if necessary, of the furnace filter;
13. A "worst case draft test",
14. Treatment of minor biological hazards in order to insure the health and safety of the Weatherization employees and clients. Examples:
    a. Mold and mildew
    b. Unsanitary conditions
    c. Rotting wood
    d. Water damage or leaking pipes.

Agencies will be allowed to replace water heaters, furnaces or space heaters as a DOE program expense in certain circumstances, and with certain restrictions as follows:

A verifiable condition must exist that allows combustion gases to enter the living environment. Such a condition would include a breach in the heat exchanger that allows the combustion gases to mix with the air in the ductwork.

An improper application of a non-sealed combustion furnace, installed in a mobile home. Mobile homes are required to have furnaces that draw their exhaust make-up air from outside the carriage. The installation of a furnace intended for use in site built homes could cause serious concentrations of combustion gases in the living environment by causing the furnace to back-draft.

The sub-grantee will determine whether repairs can effectively be made on the stove, water heater, or furnace, to enable them to operate safely, rather than require a replacement.

The agency must not continue with weatherization work, particularly air sealing the structure, until the combustion gases have been appropriately vented away from the

living area. In the case of a plugged or non-functioning vent on a combustion appliance, appropriate steps would be taken to repair, or replace, the vent.

Before a furnace is installed in a weatherization dwelling unit, the proper size of the furnace must be determined. Agencies will determine the most effective output size of the replacement furnace using Manual J heat load calculations or other appropriate methods.

Replacement of cooking stoves, which are creating a health hazard, is allowed as a health and safety measure, but must be paid for out of LIHEAP or SWEEP funds. For those agencies with only ARRA funds, repairs may be made to cooking stoves using Health and Safety funds, but they cannot be replaced using ARRA funding.

As with any unit weatherized, a final inspection must be performed to assure that the unit meets all of the requirements, as stated in CFR 440.16 (g).

IHCDA, in accordance with the provisions of Weatherization Program Notice 02-5, will allow smoke alarms to be purchased and installed as a health and safety abatement measure. Each home weatherized will be required to be equipped with working smoke detectors at the conclusion of the weatherization process. The home will be provided with one smoke detector for each occupied floor. This includes a smoke detector for all finished
basements. Since many homes already have smoke detectors, the agency's expense in many cases will be limited to the purchase and installation of batteries.

Fire Hazards
Prior to the commencement of building performance work, a visual inspection of potential fire hazards will be conducted. All building performance retrofit units will have appropriately placed smoke detectors. The identification of fire hazards will include, but not be limited to:

-Fuel/gas leaks; combustibles in the immediate vicinity of combustion appliances
-Unsafe or inadequate venting systems
-Combustion appliances failing to meet code standards/clearances

-Frayed electrical wiring/aluminum wiring
-Overloaded or misused electrical wiring
-Assessment of smoke detector adequacy
-Development of strategy to mitigate identified hazards

-Description of mitigation procedures to be conducted by building performance crew

Health and safety funds may be used to perform limited electrical repairs to eliminate fire and safety hazards; clean and repair flues, chimneys, and appliance venting to abate dangerous conditions; and repair the shell of unit to eliminate potential hazards.

Electrical Issues

Household electrical systems will be inspected for potential hazards prior to the commencement of building performance retrofit work. While electrical wiring problems are not generally an allowable measure, identification and inspection will include:

-Check for proper sizing of fuses/breakers to wiring size in circuit panel boxes
-Identify any wiring in the circuit panel box that is aluminum except for main service connections
-Inspect panel box for multiple circuits connected to individual breakers or fuses. Inspect for disconnected or lose wiring inside the box
-Ensure that panel/fuse box has a secure cover
-Identify any knob and tube wiring found in the dwelling. Test to see if live. If spliced into conventional circuitry note breakers or fuses controlling the circuit. Building performance retrofits must conform to NEC or local code
-Test all outlets for proper grounding. Identify circuits that contain non-grounding devices
-Inspect for GFI devices in bath, laundry, and pool areas. Test for proper GFI functioning
-Inspect for frayed wiring, improper splicing, and lack of junction boxes or covers
-Record problems found on a building analysis
-Identify appliances posing electrical shock hazard

To the extent that these problems prevent adequate weatherization, the agency should consider repairing them on a case-by-case basis or, if too costly, deferring the property until the electrical problem is repaired. Any remedial electrical work, including that associated with furnace installations, completed on a dwelling must be conducted by a licensed, bonded, and insured electrician and will comply with all local and state codes.

Building Structure

Building rehabilitation is beyond the scope of the Weatherization Assistance Program. Homes whose structural integrity is in question should be referred to a housing rehabilitation program, such as Owner-Occupied Rehabilitation Program offered by Rural Development, or the local housing authority. Incidental repairs necessary for the effective performance or preservation of weatherization materials is allowed. Weatherization services should not be performed on dwellings where the structural integrity would pose a safety hazard to weatherization workers.

Weatherization services may need to be delayed until the dwelling can be made safe for crews and occupants (see Deferral Standards).

Indoor Air Quality

Asbestos
Asbestos removal is not an allowable activity under the program. Local agencies are provided training on safe work practices and identification of asbestos hazards. As part of the standard health and safety testing, assessment of friable asbestos conditions is identified. Where permitted by code or EPA regulations, less costly measures that fall short of asbestos removal, such as encapsulation, may be used. Removal and replacement of asbestos siding for purposes of wall cavity insulation is permissible if allowed by local and state codes. Crews
must take all precautions to ensure that no inhalation of dust takes place. Safety equipment must be worn at all times during the handling of asbestos materials.

Radon
Radon abatement is not an allowable activity under the program. Where there is a previously identified radon problem in a home, work that could exacerbate the problem is limited. Major radon problems are referred to the appropriate local environmental agency.

Volatile Organic Compounds (VOC)
Remedying VOC problems is not a weatherization responsibility. As part of the health and safety inspection, identification of VOCs in the building is conducted. VOCs are considered when determining air tightness of dwellings and if ventilation is needed.

Lead Paint Hazards

In response to DOE's actions in adopting the EPA's revised lead protocols, Indiana is undergoing a number of steps in order to adhere to the new EPA standards effective in April of 2010. Once the standards are finalized, Indiana will take all steps nescessary to be compliant by the April 2010 implementation date. The steps ar outlined below:

- IHCDA has contracted with EMI to produce a training program which will ensure at least one certified Lead Renovator at every agency.
- As of January 2009, all 24 subgrantees will have at least one Niton brand XRF 300 analyzer.
- A meeting with the PAC has been set for January to discuss which organizations need to obtain "Firm" status.
- Monitoring has included an LSW component which reviews practices, inventory, and reporting.

The purpose of the review of LSW is to strengthen implementation and quality control of LSW, provide a framework for dust sampling and laboratory review for homes built prior to 1979 with children 6 or under, and comply with any requests for pre and post sampling for a control group of homes.

Indiana has implemented a policy regarding lead based paint procedures on homes being weatherized. This policy includes providing clients with the pamphlet "Renovate Right". In addition agency building technicians are trained on how to work in a safe lead environment to ensure adherence to EPA, OSHA Rule 29 CFR 1926 as well as to HUD's Lead Paint Hazard Control, 24 CFR 35 (Part 35). All agencies performing weatherization services are required to obtain Pollution Occurrence Insurance.

New employees are trained on safe work practices within the first twelve months of employment to protect employees from the hazards of lead during weatherization work, to limit worker exposure to airborne lead during weatherization, and to ensure that employers such as CAA's communicate the hazards of all hazardous chemicals in the workplace by

1. Labeling all containers of hazardous chemicals,
2. Having a written hazard communication program
3. Providing material safety data sheets, including on lead
4. Training workers on safe chemical practices during normal and emergency actions.

What must agencies do?

1. Provide the Lead Paint form to all clients and landlords.
2. Use XRF machine to determine levels of lead in work areas as well as in individual components that might be disturbed when completing weatherization work.
3. After assessment, do not disturb areas where lead based paint is known or assumed to exist.
4. Protect occupants' belongings from contamination.
5. Prevent unauthorized entry to work site until work is completed.
6. Cover surfaces below work area to contain dust and debris and prevent release of leaded dust.
7. Use suitable work practices to prevent the creation, spread, inhalation, and ingestion of lead dust.
8. Conduct interim controls to reduce the production of lead dust or perform necessary weatherization work.
9. Arrange for clearance testing when necessary.
10. Properly manage and dispose of contaminated protective clothing and other debris.
11. Wash hands and face; be aware of personal hygiene when leaving the workplace.
12. Use of these safe work practices on all weatherization projects.
13. When working in areas known to contain lead, develop Action levels to permissible exposure limit.

Agencies will adhere to the following guidelines when determining the need for lead safe work practices:

1) Ask if a resident of the home has been identified as being lead poisoned while living in the home. If the answer is yes, proceed with the inspection but coordinate with the local health department before disturbing any paint.
2) Presume that lead-based paint is present unless one of the following conditions apply:
   a) The residence was built after 1977; or
   b) The owner or occupant provides the analyst with a copy of an inspection report signed by a lead inspector or risk assessor licensed by the Indiana State Department of Health that indicates no lead-based paint is present;
3) If lead-based paint is present or presumed to be present, assess whether the paint is seriously deteriorated (i.e. that a workman's presence just walking around the residence is enough to stir up lead-based paint laden dust residues). The XRF should be used to determine the amount of lead in the dust using a dust wipe sample; and
4) If the lead-based paint is seriously deteriorated, defer all weatherization work, document your decision, and recommend that children in the home get a blood lead test. Contact the local health department for guidance.

Community Action Agencies shall use the following lead-safe work practices whenever known or presumed lead-based paint is disturbed. Please note that additional work practices are required when the work is covered by the HUD rule (see Section I for more information). In all cases where lead-based paint is disturbed, an OSHA Compliance Plan for Indiana Weatherization Projects consistent with Appendix C must be prepared and signed. The Building Technician Crew Leader is responsible for ensuring that these work practices are followed:

1) General: When any lead-based paint is disturbed:
   a) Tell the occupants to stay out of the work area
   b) Ensure that workers can wash their hands and face when leaving work area
   c) Ensure that workers do not smoke, eat, drink, chew tobacco or gum, or apply cosmetics in the work area
   d) If desired wear a respirator or dust mask;
   e) Obtain a Ground-Fault Circuit Interrupter (GFCI) if electrical equipment will be used
2) Do not use any of the following methods to remove the paint:
   a) Open-flame burning or torching;
   b) Machine sanding or grinding without high-efficiency particulate air (HEPA) local exhaust control
   c) Abrasive blasting without HEPA local exhaust control;
   d) Heat guns at temperatures above 1100oF or charring the paint
   e) Dry sanding or dry scraping except:
      (i) In conjunction with heat guns (low temperature)

(ii) Within 1.0 ft of electrical outlets; or

(iii) When treating defective paint spots totaling no more than:

(iv) 2 sq. ft. in any one interior room or space or 10% of a small component; or

(v) 20 sq. ft. on exterior surfaces; and

vi) Paint stripping in a poorly ventilated space using a volatile stripper that is a hazardous chemical under OSHA as applicable to the work.

f) Lightly spray the paint with water before disturbing it and try keep it wet and use wet sanding/scraping methods whenever disturbing the paint;

g) If equipment is going to be reused, wash it thoroughly before leaving residence

h) Dispose of all lead-based paint, debris, coveralls, and plastic covering in regular trash; and

i) Dispose of all water contaminated with lead-based paint in a sanitary sewer system.

3) Minor Paint Disturbances: When less that 2 square feet per room or 10% of an interior component of lead-based paint is disturbed inside or less than 20 square feet of lead-based paint is disturbed outside:

a) Follow general requirements described in item 1) above

b) Tape a plastic bag or sheeting on the horizontal surface below the paint to collect paint chips and any dust that may be formed; and

c) After work is done, wipe the surface with a baby wipe or towel.

4) Exterior Paint Disturbances: To be used when more than 20 square feet of exterior lead-based paint is disturbed. Generally, removing siding from a wall is presumed to disturb more that 20 square feet of lead-based paint unless it is known beforehand that deteriorated lead-based paint and lead dust is not behind the siding.

a) Follow general requirements described in item 1 above

b) String barrier tape saying "WARNING" or "DANGER" or "DO NOT ENTER" at least five feet beyond area where lead-based paint will be disturbed

c) Post OSHA warning signs near the exterior work so it can be easily read from 20 feet away from the edge of the exterior worksite.

d) Ensure that everyone who enters the work area wears plastic coveralls, shoe covers, and hair covering and removes them when leaving the work area;

e) Seal any windows, doors, dryer exhausts or other openings in the work area

f) Remove or cover any equipment in the work area with plastic sheeting

g) Place six-mil thick plastic sheeting on wall below the paint to be disturbed and on the eight feet from the wall in a manner that it captures the water (15 feet if disturbed paint is on the second floor);

h) Place a 2" x 4" board or similar device along the outer edges of the plastic to capture water

i) Wash off any siding that is removed

j) Repair any deteriorated paint and fix cause of deterioration

k) Remove plastic, clean up any debris, and dispose in trash so that no deteriorated paint and visible paint remains.

5) Interior Areas:

a) Follow general requirements described in item 1) above

b) Ensure that the occupant has received the EPA Pamphlet Protect Your Family From Lead In Your Home

c) Post OSHA warning signs at the main and secondary entryways to the building.

d) Ensure that everyone who enters the work area wears plastic coveralls, shoe covers, and hair covering and removes them when leaving the work area;

e) Remove throw rugs and other furniture that can be removed.

f) Cover remaining furniture and horizontal surfaces with plastic sheeting extending the sheeting on the floor up the wall about 18";

g) Seal any air supply or return into the work area

h) Repair any deteriorated paint and fix cause of deterioration

i) Remove plastic, clean-up any debris and dispose in trash so that no deteriorated paint and visible paint remains;

j) Wipe walls and horizontal surfaces to remove dust

k) Arrange to have dust wipe samples taken and assayed using the NITON XRF by an Indiana State Department of Health-licensed risk assessor or inspector before residents reenter the work area and ensure that:

i) Dust levels have not increased from the pre-work levels; and

ii) Where possible, EPA dust clearance standards of 40: g/ft2 on the floor and 250: g/ft2 on the window sill are met for the room where the interior paint is disturbed;

iii) Report summarizing the results signed by the risk assessor or inspector are given to the owner and occupant; and

iv) Owner is told that the report must be provided to future owners and occupants.

Training will be provided to all Weatherization Building Technicians as part of the certification process.

In cases where agencies must work in homes are considered to be in danger of lead based paint contamination, agencies will complete as many of the measures as possible to ensure energy savings without disturbing the existing paint in the home. Those homes that are found to be contaminated must be referred to HUD or other appropriate agencies for abatement or control of the lead paint hazard prior to performing weatherization work that disturbs the paint.

Agencies will evaluate the Indoor Air Quality of all homes before any weatherization measures may be performed. Air quality issues include the presence or suspected presence of asbestos, radon gas, formaldehyde and other volatile compounds. The presence or suspected presence must be reported to the county health department for

evaluation. If the above contaminants are confirmed, weatherization services will be deferred until such time as the hazard has been abated.

Agencies will ensure that electrical system does not pose a danger to the residents and or the weatherization crew. Agency energy auditors will identify potential electrical hazards that exist in a home. Minor problems may be corrected as other necessary incidental minor repairs. Live knob and tube wiring will not be covered by insulation. Major problems requiring extensive labor and material costs will be deferred until such time as the problem has been abated.

Indiana will not refuse weatherization services to any client. The state will defer weatherization services to clients whose home where an identified health and safety issue exists until such hazards are eliminated. Hazards include but are not limited to the following:

1. Homes with known environmentally causes health issues such as lead poisoning
2. Homes with existing structural problems that are beyond the scope of weatherization services that render the structure unsafe
3. Homes with sanitary problems that poses a danger to weatherization crews or contractors
4. Homes with excessive moisture problems.
5. Homes where the client is uncooperative, threatening towards weatherization staff or contractors
6. Homes with pre-existing conditions that endangers the health or safety of weatherization crews or contractors.

Refrigerants

Refrigeration appliances that are replaced must be disposed of according to the environmental standards in the Clean Air Act (1990), Section 608, as amended by Final Rule, 40 CFR82, May 14, 1993. The local agency, appliance vendor, demanufacturing center, or other entity recovering the refrigerant must possess an EPA-approved section 608 type I license or an approved universal certification.

Existing Occupant Health Problems

Before beginning work on a home, local agencies will take into consideration, the health concerns of each occupant, condition of dwelling, and possible effects the work performed will have on the health or medical condition of the occupants. Sub grantees will establish procedures to identify preexisting health conditions and address problems before they occur. Agency staff and contractors will protect clients from the hazards of airborne particles and fumes during weatherization work. Containment strategies and client relocation plans will comply with the lead paint policy when an existing occupant health problem is identified. (See Lead Paint Policy for work area containment requirements and client relocation standards.)

Code Compliance Issues

In accordance with the 2006 Indiana Policy and Procedures Manual, Section 311, all weatherization service providers and their crews and subcontractors are required to weatherize homes in compliance with relevant local building, plumbing, and electric codes. These local codes are to be considered during both the audit protocol and the service delivery to the home. As part of routine monitoring, Indiana State staff review customer files and note when local code compliance activities were recorded.

Deferral Standards

Some weatherization activities must be deferred due to problems that are beyond the scope of weatherization. Deferrals may take place during any phase of the weatherization process, including but not limited to: during or after the energy audit, the work performance phase, or immediately following the identification of a health and safety risk to the occupants or to crew and contractors. Postponement of work is advisable until problems can be resolved and/or alternative sources of assistance are identified. Existing conditions under which a dwelling unit can be deferred until certain corrective actions occur include, but may not be limited to, the following:

- Elevated carbon monoxide levels where abatement is not possible using WAP funds
- Existing moisture problems that cannot be resolved under the health and safety limits.
- House with sewage or other sanitary problems that not only endangers the customers but the workers who will perform the weatherization work.
- Occupant's health condition
- Building structure or its mechanical systems, including electrical and plumbing, are in such a state of disrepair that failure is imminent and these conditions cannot be resolved in a cost effective manner
- Customer is uncooperative, abusive, or threatening to crew, subcontractors, auditors, inspectors, or others who must work on or visit the house
- Extent and condition of lead-based paint in the house would potentially create further health and safety hazards
- Any existing condition that could endanger the health and/or safety of the work crew or subcontractor and cannot be safely abated within the scope of WAP

All agencies will pursue alternative funding 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

Any client who has received a deferral by a local agency must be allowed to pursue an appeal. The appeal will follow the established procedure set forth in the Section 103 of the "Weatherization Assistance Program Policy and Procedures Manual", which states:

> When a CAA determines that a household is ineligible or deferred pending remedial action, the agency must provide a written denial or deferral to the client. Within ten working days of the application an ineligible or deferred household must be notified of the reason(s) for the denial or deferral and advised of their right to appeal the decision to the next level. CAAs must retain in the household file a copy of the denial/deferral letter with the appeal procedure that was sent to the client.
>
> IHCDA recommends that the "**Applicant Notification"** form for EAP denials be the basis of any form created by the CAAs to notify weatherization clients of their denial/deferral for services.

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

1. Local review involves the written policy of each CAA for handling client complaints or appeals of program decisions. The final step in the local process should involve a written determination by the agency Executive Director.

State review occurs when a denied/deferred weatherization applicant is not satisfied with the local agency determination. The applicant appeal must be made in writing within thirty days of the local denial/deferral, to the Indiana Housing and Community Development Authority Supervisor and a Community Development Administrator. All pertinent material to the case will be requested from the CAA by IHCDA in order to make a determination.

310 REWORK POLICY

A “rework” is defined as any unit which meets all of the following four criteria:

- The unit has already been claimed as a completion and funds have been claimed from IHCDA.
- The unit was claimed as a completion in prior, closed grant year.
- The unit requires additional measures outside the scope of the original audit.
- Measures needed are considered an allowable cost under respective DOE, LIHEAP, and SWEEP grant regulations.

Measures performed under the rework designation cannot be claimed as a completion and must be drawn against current grant funds. Reworks must also be claimed using the same funding sources as originally used in the dwelling. Reworks must be clearly identified

with “rework” written on the front of any claim or invoice submitted to IHCDA for payment are subject to annual monitoring during both the technical and program reviews. Reworks are limited to the eighteen months following the original completion date.

Examples:

1. During monitoring of last year’s grant, it is discovered that a knee wall attic was missed during the initial audit. The attic will require insulation and air sealing not identified on the original work order. The Weatherization Administrator may complete the necessary work and pay for these activities using weatherization funds, but they will not be able to claim these activities or this home as a completion.
2. A client had a furnace installed with LIHEAP Mechanical funds with a completion date of August 12, 2006. The client calls back in December of 2006 with furnace issues. The Weatherization Administrator may go back to the home and address the furnace issue using current LIHEAP Mechanical funds. However, the household may not be claimed as another completion, but must be marked as a rework.

311 DEFERRAL STANDARDS

Some weatherization activities must be deferred due to problems that are beyond the scope of weatherization. Deferrals may take place during any phase of the weatherization process, including but not limited to: during or after the energy audit, the work performance phase, or immediately following the identification of a health and safety risk to the occupants or to crew and contractors and must be in writing. Postponement of work is advisable until problems can be resolved and/or alternative sources of assistance are identified. Existing conditions under which a dwelling unit can be deferred until certain corrective actions occur include, but may not be limited to, the following:

- Elevated carbon monoxide levels where abatement is not possible using WAP funds
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- Customer is uncooperative, abusive, or threatening to crew, subcontractors, auditors, inspectors, or others who must work on or visit the house
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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
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- City-funded housing and rehabilitation programs
- Donations or financial participation from landlords
- Donations from local churches or community groups

Any client who has received a deferral by a local agency must be allowed to pursue an appeal. The appeal will follow the established procedure set forth in the Section 103 of this manual.

SECTION 400

BUDGETS, REPORTS, AND CLAIMS

401 BUDGET FORMS

The Weatherization Assistance Program utilizes four different funding sources in the delivery of services. For each funding source, the Weatherization Administrator must complete and return to the Community Development Administrator a separate budget form prior to the beginning of each program year. Any Weatherization Administrator that does not have approved budgets by the start of the program year will have all weatherization claims held by the Community Development Administrator until receipt of the budget form. In general, the forms should be used to assist a Weatherization Administrator in planning production and budget targets for the grant period.

Requests for budget proposals will be sent to each Weatherization Administrator at approximately the same time as the contracts are mailed to the Weatherization Administrators for signature. *Sample budget forms and definitions are in Appendix C.*

The funding source close-out report will be considered the final budget, provided that no individual line item has exceeded the limitations for that cost category. IHCDA will not load specific dollar amounts into the claims system on a line by line basis. If an agency claims more than the amount budgeted for a particular category, no red-lining will occur. Each Weatherization Administrator will be responsible for limiting expenses to the amounts allowed for in the budget line items.

In no instance will a sub-grantee be permitted to exceed the total award for a funding period.

402 PROGRAM INCOME

Program income is defined as payments for services rendered using Weatherization funds, as noted in 10CFR600. It is required that income earned from activities supported by a grant or sub-grant must be reported as program income. Sources of income to be reported include:

- Income from payments of principal and interest
- Income from fees or services provided
- Income from the use of rental or real property acquired with grant funds
- Income from the sale of commodities or items fabricated under a grant agreement.

Program income is to be treated as an addition to program funds and monies generated are to be used to complete additional dwelling units in the twelve month cycle immediately

following the end of the contract year in which the program income was earned. An annual report stating the amount of program income received will be detailed by the Weatherization Administrator on the funding source close-out report.

403 QUARTERLY REPORTS

Information for the quarterly reports is to be entered into the weatherization software by the tenth day after the end of each quarter. Timely entry of all weatherization information ensures that current data is relayed to the appropriate federal funding source and in turn is used by the federal government to justify future appropriations. Quarterly Production Reports are also used in the closeout and agency reconciliation process. The Community Development Administrator will pull reports from the IWAP database for all production information from the local Weatherization Administrators. *Appendix D shows a sample Quarterly Report from the IWAP database (page 1 of 5).*

404 SPENDING BENCHMARKS

IHCDA's goal is to expend the total amount of allocated funding for each funding source. Spending benchmarks and dates will be established for each funding source will be included in all grant agreements starting in 2009 and later. Quarterly requests for progress will be made by the Contract and Fund Management Specialist. For Weatherization Administrators who are substantially underspent, a request may be made for a meeting and/or conference call with the Program Manager, Financial Services Director, Community Services Manager and/or Executive Director to discuss progress on the program. Additionally, IHCDA may require additional planning documentation and reporting. Under circumstances where the Weatherization Administrator fails to display adequate progress and/or fails to provide a definitive plan for the remaining of the grant period, IHCDA reserves the right to decrease the amount of the grant and reallocate funds to another Weatherization Administrator.

405 FUNDING SOURCE CLOSE-OUT REPORTS

Year-end reports are due to the Community Development Administrator within sixty days of the end of the program year. Close-out reports should accurately reflect the total dollar claimed for each line item after the final claim has been paid by IHCDA. The reports are used to reconcile IHCDA and Weatherization Administrator records regarding payments and claims. Close-out reports are also cross-referenced with the IWAP database to ensure the Weatherization Administrator compliance with program guidelines. Weatherization Administrators are required to submit an original, signed, and complete closeout report that meets all program requirements to the Community Development Administrator by the due date. Outstanding weatherization claims will not be forwarded for payment until receipt of the report and the Weatherization Administrator will not be eligible for the incentive pool allocation (DOE and LIHEAP funded programs only). Emailed or faxed copies will not be sufficient for closeout reports and incentive pool consideration. *Appendix E shows a Close Out Report for the DOE program.*

406 CLAIM PROCESSING

Weatherization Administrators shall submit to the IHCDA, at least monthly, properly completed claims for reimbursement of costs incurred during the prior month. Claims shall be submitted on forms provided by IHCDA and pursuant to instructions issued by IHCDA. *See Appendix F for a sample IHCDA Claim Form for DOE.*

Weatherization Administrators may claim on incurred (accrued/obligated) material expenses. This is intended as "just in time" funding. Only material expenses that are expected to be due within ten days of the receipt of the claim may be submitted to IHCDA. No subcontractor of a Weatherization Administrator shall be paid for labor costs until such time as the Weatherization Administrator has inspected the work and has determined that any such work has been performed in a satisfactory manner. Where subcontractors are utilized, the cost of materials shall be separated from the cost of installation in billings submitted by the subcontractor.

All final claims and reports must be submitted to IHCDA within sixty calendar days after the end of the program year or IHCDA shall deny payment. Weatherization Administrators must liquidate all outstanding obligations properly incurred during the term of the agreement no later than sixty calendar days after the termination of the program year.

407 ADMINISTRATION OF FUNDS

Funding shall be provided to Weatherization Administrators as a reimbursement for authorized expenditures incurred for the Weatherization Assistance Program (WAP), in accordance with the fiscal policies and procedures of IHCDA and the State of Indiana. Weatherization Administrators must maintain and implement written procedures to minimize the time elapsing between the transfer of funds to the Weatherization Administrator and the Weatherization Administrator's issuance of payment to subcontractors for program purposes. Weatherization Administrators will have a total of sixty days from the receipt of subcontractor invoice, to check issuance, to the funds being withdrawn from agency account.

408 BID PROCEDURE FOR PURCHASES

Weatherization specific equipment with a unit cost of greater than $5,000.00, such as vehicles, may be purchased with the Equipment line item. Equipment requires prior written approval from IHCDA before the purchase is made. All requests must follow IHCDA bid procedure to be considered for approval.

Bid procedure:

1. Bid Specifications
    - Write specifics for the item you are requesting to purchase – make, model, features, year, new/used, etc.
    - Specifications should be specific to the organization's needs but not so specific as to pin point an already selected item.

2. Solicit Bids
    - Mail, email or deliver bid specifications to local dealers or companies to solicit bids
    - A minimum of three bids must be solicited and submitted.
    - If you do not receive three bids or the bids did not meet the specifics, a bids may be selected based on a similar make and model. This is only true for unique items.
3. Bid Selection
    - Review and select a bid that meets your bid specifications.
    - If this bid is not the lowest bid, please specify why it was chosen.
    - Priority should be given to bids meeting the specific bid description.
4. Requesting approval from IHCDA
    - Mail or email a letter with an authorized signature to the IHCDA Contract and Fund Management Specialist.
    - The letter should describe: your bid process, your selected bid and the reason for your choice.
    - Attachments should include: your bid specification, a list of companies or dealers solicited and three bids meeting your specifications.
5. IHCDA Approval
    - If your request is complete, a letter will be sent via email approving your purchase.
    - Incomplete requests will delay approval and may require rebidding for valid bids.
    - IHCDA will respond within five business days with questions or approval.

409 EQUIPMENT INVENTORY AND VEHICLE TITLES

Weatherization Administrators is required to compile, on an annual basis, an inventory of all capital equipment (including vehicles) in Weatherization Administrators' possession purchased with federal or IHCDA funds. An inventory must be maintained at the Weatherization Administrators office and provided to IHCDA upon request. The inventory will include:

1. A brief description of the property;
2. A manufacturer's serial number, model number, federal stock number, national stock number, or other identification number of the property;
3. The source of the property, including the award number;
4. Whether the Weatherization Administrators, IHCDA or federal government holds the title;
5. The acquisition date (or date received, if the equipment was furnished by the federal government);
6. Information from which one can calculate the percentage of federal participation in the cost of the equipment (not applicable to equipment furnished by the federal government);
7. The location and condition of the property and date the information was reported;

8. Unit acquisition cost; and
9. Ultimate disposition data including the date of disposal and sales price.

Weatherization Administrators will be required to submit all relevant depreciation schedules applicable to the audit period at the time its independent audit report is submitted. Weatherization Administrators further agrees to comply with any additional requirements that IHCDA may deem necessary with respect to the management and distribution of equipment purchased. Weatherization Administrators may not purchase or maintain inventory which exceeds an amount necessary for the performance of this agreement.

When purchasing a new vehicle with federal grant funds, the title will list, Indiana Housing and Community Development Authority (IHCDA), as the lien holder. The title must be mailed to IHCDA to the attention of the Contract and Fund Management Specialist. All titles will be held at the IHCDA office. If a vehicle is to be traded in, IHCDA needs to receive a formal written request to release the title of any vehicle. Any trade-in value must be identified and credited toward the purchase of new vehicles prior to the release of any titles.

SECTION 500

FUNDING

501 ALLOCATIONS

Starting with the 2007 program year, 85% of Weatherization Administrator contracted funds will be distributed using the historical allocation formula. The remaining 15% will be set aside and contracted out to only those Weatherization Administrators meeting all of following criteria:

A. 95% or more of the prior program year contract total must have been expended.
B. Original, signed, contract closeout reports must be submitted on time (60 days after the program year ends), be accurate upon receipt (meaning IHCDA REPSS and agency closeout match exactly when final claims are processed), and all line items and averages within allowable limits (meaning production as shown in IWAP and expenditures as shown on closeout and REPSS are identical and within program limits). Claims, closeout reports, and production must all be on-time, accurate, and allowable in order to meet this criteria for the incentive pool.
C. Weatherization Administrators must demonstrate at yearly monitoring that a sampling of contractors or vendors are issued payment and that payment is utilized within the 60 days of invoice.
D. Certifications for all Weatherization Administrator and contractor staff are current and active throughout the previous contract year.
E. A 15% average energy savings as determined by PRISM analysis of local agency production.

No Weatherization Administrator operating under a 120-day Quality Improvement Plan (QIP), not including the one-time certification extension, will be permitted to be included in the incentive pool during the QIP period.

502 DOE

All DOE completions are counted as Base Program completions. The maximum allowable average cost per home in DOE, effective April 1, 2009 is $5,000.

In order for a home to be counted as a DOE completion:

- At least $100.00 in labor and materials must have been used. To count any units with less than $100.00 in labor and materials requires prior written approval from IHCDA.
- Weatherization work must be completed on the shell. This includes, but is not limited to air sealing, insulation of the walls and attic, perimeter, foundation,

or floor preparation and insulation, and up to $500.00 in materials for incidental repairs.

Agencies are required to complete appropriate base load measures on all homes completed in weatherization. Those measures include, but are not limited to:

- Faucet aerators
- Low flow showerheads
- Water heater blankets;
- Pipe insulation
- Air sealing
- Duct sealing
- Compact fluorescent light bulbs.

DOE funds used to abate health and safety problems, as defined in Section 309, are to be tracked as a separate line item. These costs are not to be included in the average cost per home. IHCDA limits expenditures in Health and Safety budget line to 15% percent of total Program Operations expenditures (total agency allocation minus administrative costs, audits, and insurance). All health and safety measures must be charged within the allowable 15% Health and Safety line item.

Repair or replacement of the cooking stove may not be charged to DOE but must be paid for with LIHEAP or SWEEP funds.

Furnaces may be replaced for energy efficiency. However, agencies must use NEAT to calculate the savings-to-investment ratio. A SIR of greater than one must be obtained to justify this expense under DOE.

Program Expenditure Limits for DOE

Budget categories for DOE include:

- .1 Administration – Sub-grantees with initial awards of $350,000.00 or more may use no more than 5% of total expenditures for administrative purposes. Sub-grantees with awards of less than $350,000.00 may use no more than 10% of total expenditures in this budget line. If an award increases during a program year to more than $350.000.00, the amount over $350,000.00 will be held to the 5% limit.
- .2 Liability Insurance – Actual costs, per agency cost allocation plan, attributable to the weatherization program for liability insurance. Liability insurance must also include a Pollution Occurrence Rider.
- .3 Fiscal Audits – Actual costs, per agency cost allocation plan, attributable to the weatherization program for independent fiscal audits

Total Program Operations is computed by deducting the costs for Administration (budget line .1), Liability Insurance (budget line .2), and Fiscal Audits (budget line .3) from the total DOE grant. It includes the following categories:

- .4 Base Program Operations – The cost of weatherizing the house. Agencies may not exceed an average cost per home of $5,000 in Base Program Operations.
- .5 Health and Safety – The cost for the evaluation, repairs, and/or replacement of water heating or space heating systems. This category represents an additional 15% of program operation expenditures and is not included in the average cost per home.

Sub-grantees may provide services to a dwelling unit previously weatherized prior to September 30, 1994, as noted in the American Reinvestment and Recovery Act of 2009.

503 LIHEAP

Homes may be counted as completions based on three sub-program categories within LIHEAP.

1. Base Program completion occurs when at least $100.00 in labor and materials have been used. The maximum allowable average effective October 1, 2009 is $3,000.

2. Mechanical Program is to be used in conjunction with DOE completions that require extensive work on the mechanical systems including the addition of mechanical ventilation to a dwelling. Under LIHEAP, work on the mechanical systems may be completed for health and safety and/or energy conservation reasons. The minimum amount to count a home, as a Mechanical Program completion, is $300.00 spent on the mechanical system. The DOE Base completion that **must** be paired with a Mechanical completion has to be finished by the end of the LIHEAP program year in order to count a dwelling under this sub-program. The maximum average of LIHEAP Mechanical Program homes is $3,000.00.

3. Capital Intensive Program is a completion that charges both the Base work and the Mechanical work to LIHEAP. At least $300.00 must be expended on the mechanical system and $100 in Base measures. Work on the mechanical systems may be completed for both health and safety and energy conservation. Capital Intensive costs cannot exceed the maximum average cost per home that is the total of Base Program and Mechanical Program. The current maximum average amount is $6,000.00. (Effective October 1, 2009)

A home may be counted as a completion under only one LIHEAP sub-program. Under no circumstances may a completion be counted as both a Base and a Mechanical completion within the LIHEAP program. A home may not be counted as both a DOE and a LIHEAP Base completion.

If both the Base work and the Mechanical work are completed under LIHEAP, the home may be charged to the Base Program or Capital Intensive if there is at least $300.00 of work to the mechanical systems.

IHCDA allows, as a LIHEAP program expense, the costs of eliminating energy related health and safety hazards prior to installation of weatherization materials. The replacement of gas cook stoves will be allowed with LIHEAP and SWEEP funds as a health and safety measure. Health and safety is not a separate budget line item in LIHEAP and therefore is included in the average cost per home.

Sub-grantees may provide weatherization services to a dwelling unit previously weatherized at least **five years** prior to the beginning of the current LIHEAP program year.

Program Expenditure Limits for LIHEAP

Budget Categories for LIHEAP include:

- .1 Administration – Costs associated with administration include fiscal, executive, support operations, rent, utilities, supplies, etc. Total claimed may not exceed 6.753% of the total LIHEAP expenditures.
- .2 Liability Insurance – Actual costs attributable to the weatherization program, per agency cost allocation plan. Liability insurance must also include a pollution occurrence rider.
- .3 Supplies – Actual costs of weatherization specific supplies with a unit cost of less than $5,000.00. Examples include blower doors, draft gauges, and combustion analyzers.
- .4 Equipment - Weatherization specific equipment with a unit cost of greater than $5,000.00, such as vehicles, may be purchased with this line item. Equipment requires prior written approval from IHCDA before purchase.
- .5 Base Program Operations – Actual costs for performance of necessary weatherization measures as determined by the energy audit with a minimum of $100.00 in labor and material. Work may include, but are not limited to, air sealing, insulation, and base load measures involved in weatherizing the house. Health and safety costs are included in this category.
- .6 Mechanical Operations - Costs in this item include, but are not limited to, testing and evaluation of combustion appliances up to the maximum average of $3,000.00 The minimum mechanical cost for a unit to be counted as a Mechanical Operations completion is $300.00.
- .7 Capital Intensive Operations - Costs that combine those associated with Base and Mechanical Operations. A minimum of $300 must be spent on mechanical repairs and at least $100 in labor and material on the Base in order to claim under the capital intensive line item.
- .8 Refrigerators – Costs associated with testing, scheduling replacement, removal of old unit and secondary refrigerators, and actual costs of replacements. All replacements must be Energy Star rated.

504 SWEEP

SWEEP program expenses are those associated with the costs of eliminating energy related health and safety hazards prior to installation of weatherization materials. These funds should not be used for refrigerator replacement, testing, removal, or recycling.

SWEEP benefits include, but are not limited to, extensive evaluation, repair and/or replacement of the mechanical systems (i.e. furnace, water heater, and gas cooking stove). The underlying rationale for the expenditures of these funds is to ensure the delivery of a consistently high level of energy conservation services to low-income clients.

The following activities may take place under SWEEP:

- Furnace replacement/repairs
- Water heater replacement/repairs
- Gas cooking stove replacement/repairs
- Dehumidifiers to alleviate severe moisture problems
- Sump pumps to alleviate severe moisture problems
- Repairs to guttering to alleviate severe moisture problems
- Repairs to electrical hazards for health and safety reasons
- Sewage problem repairs
- Fumigation due to insect infestation

SWEEP funds may also be used as a stand-alone program to alleviate combustion appliance emergencies under the following stipulations:

1. The household is without heat due to an inoperable heating source
2. The combustion appliance has been red tagged
3. The combustion appliance is causing a health and safety hazard

A home which was originally provided stand alone SWEEP measures on a combustion appliance may not have SWEEP funds used later in the provision of weatherization services. In addition, if the home was originally weatherized and SWEEP funds were used in conjunction with the weatherization work, and the mechanical system fails at a later date, the agency may not complete the repair or replacement for the former WAP client with SWEEP funds. Agencies may submit a written request for approval to complete additional and necessary repairs that are beyond the scope of the regular SWEEP funding and are necessary for the home to be weatherized.

Program Expenditure Limits for SWEEP

Budget Categories for SWEEP include:

- .1 Administration - Costs associated with administration include fiscal, executive, support operations, rent, utilities, supplies, etc. Total claimed may not exceed 6.753% of the total SWEEP expenditures.
- .2 Liability Insurance - Actual costs attributable to the weatherization program, per agency cost allocation plan.
- .3 Fiscal Audit - Actual costs, per agency cost allocation plan, attributable to the weatherization program for independent fiscal audits.
- .4 Program Operations – Actual costs associated with providing a high level of energy conservation. The current maximum allowed is $2,800 per home.

505 ARRA

Program Expenditure Limits for ARRA

.1 Administration Costs: An Weatherization Administrator may use up to 5 percent of the total program operations expenditures for contract of $350,000.00 or more or 10 percent of the total program operations expenditures of contracts of less than $350,000.00. Costs associated with administration include fiscal, executive, support operations, rent and utilities, supplies etc. This applies to staff engaged in program administration.

.2 Liability Insurance: Insurance coverage of $500,000.00 covering the risks related to the property and personal liability claims of other parties against the insured party. Liability insurance must include Pollution Occurrence Rider.

.3 Fiscal Audit: The cost of obtaining a independent fiscal audit. The amount charged is based upon agency cost allocation plan.

Total Program Operations is computed by deducting the costs for Administration (budget line .1), Liability Insurance (budget line .2), and Fiscal Audits (budget line .3) from the total DOE grant. It includes the following categories:

- .4 Base Program Operations – The cost of weatherizing the house. Agencies may not exceed an average cost per home of $5,000 in Base Program Operations.
- .5 Health and Safety – The cost for the evaluation, repairs, and/or replacement of water heating or space heating systems. This category represents an additional 15% of program operation expenditures and is not included in the average cost per home.

ARRA funds may be combined with LIHEAP or SWEEP funds but all costs must tracked separately and only two sources of funding may be used on any given home .

506 FUNDING SOURCE COMBINATIONS

Weatherization Administrators are expected to utilize any and all utility program funds on every eligible weatherization job. Those Weatherization Administrators who service territory is covered by a DSM Program should charge eligible costs and measures to the utility funds first. This policy will maximize funds for service delivery throughout the state.

The funding sources for weatherization and their sub-programs may be combined on any one weatherization job, in order to provide flexibility and to ensure that an individual dwelling can receive all appropriate measures as determined by the energy audit. The following are the allowable funding source combinations:

1. DOE Base + SWEEP
2. DOE Base + LIHEAP Mechanical
3. LIHEAP Base + SWEEP
4. LIHEAP Capitol Intensive + SWEEP
5. ARRA Base + SWEEP
6. ARRA Base + LIHEAP Mechanical

Please note that the maximum number of state and federal funding streams that can be combined on any one dwelling is two and any one unit can only be counted as a completion in two funding sources. The only instance where three state funding sources are allowable is when using LIHEAP dollars for refrigerator replacement and testing.

Examples of how to combine various funding streams are given below.

- A home is weatherized under DOE Base Program. The Mechanical work, totaling $600.00 is completed under the LIHEAP Mechanical Program. The Base work would be charged to DOE, including all related labor. The Mechanical work, including labor, would be charged to LIHEAP. This would be a completion under the DOE Base Program and also under the LIHEAP Mechanical Program.
- The home is weatherized, however the mechanical costs are $275.00. The Base work may be completed under either the DOE or LIHEAP Base Program. The costs for the mechanical work can be charged as health and safety costs which are not included in the average cost per home for DOE, or in the average cost per home within the LIHEAP Base Program. Another option would be to charge the mechanical work to SWEEP. Since the cost for the mechanical work is less than $300.00 this work can not be charged to the LIHEAP Mechanical Program, or to LIHEAP Capital Intensive.
- The Base work was completed under LIHEAP, however the home required $2,000.00 in mechanical work. The mechanical work could be completed under SWEEP. This would be a completion under LIHEAP Base Program and under SWEEP.
- The same home in the previous example could be completed as a LIHEAP Capital Intensive unit and counted once as such. Or the Base work could be completed under DOE and the Mechanical work under LIHEAP Mechanical and counted as a completion under both programs.

SECTION 600

TRAINING AND CERTIFICATION

601 IMPORTANCE OF TRAINING

Due to the technical and changing nature of the Weatherization Assistance Program, a high priority has been placed on the training aspect of the program. In Indiana, the training center is operated by the Indiana Community Action Association (INCAA) under contract with IHCDA. Agencies are encouraged to send appropriate staff to training as it is scheduled. Classes combine lecture with applied field demonstrations of the concepts discussed in the classroom in order to provide theory and application to weatherization staff and contractors.

Technical assistance on particular problems in the field is a strong component of WAP. INCAA training staff are available for technical assistance in the field, as well as, IHCDA Monitors. It is often very productive for IHCDA staff to be in the field at the time of INCAA Technical Assistance visits. In this manner, all involved parties are able to see the results of the weatherization measures provided.

Agencies are strongly encouraged to take full advantage of the opportunities available to them for program enhancement and improvement through the training center. IHCDA has taken a strong position that the Weatherization Assistance Program will maintain its level of technical expertise only through the continued emphasis on its Training and Technical Assistance component.

Training and monitoring are the tools that IHCDA uses to ensure that weatherization measures are applied consistently, and that Indiana maintains a high standard of work. Along with increasing flexibility in combining funds, IHCDA has implemented training requirements to help ensure that the additional monies provided are used on weatherization measures that will guarantee energy savings. By including all staff and contractors in this process, it will assure organizational performance while providing the means for evaluating our achievements, as well as developing plans to improve upon our successes.

602 MINIMUM TRAINING HOURS

Due to the varied job functions of weatherization employees throughout the State, training/certification requirements will be based on the specific duties of the employee and not on the job title. Training requirements are as follows:

- IHCDA monitors responsible for evaluation of the Weatherization Administrators will complete at least forty hours of training per year, twenty of which must be weatherization technical preparation.

- Program Managers responsible for the administration of the weatherization program at the agency level are required to attend a minimum of twenty hours per year of administrative classes. Attendance at Semi-Annual Managers Meeting (SAMM), fiscal, computer classes, or other administrative offerings provided by IHCDA will count towards this requirement. Each Weatherization Administrator will ensure that the Program Manager or his/her designee will attend all SAMMs.
- Each agency or organization will be required to send field staff and/or contractor personnel to all Semi-Annual Technical Trainings (SATT).
- Building Technicians responsible for completing shell work on the home under a crew leader, newly hired, and have not passed certification will be required to attend the following six classes within the first year of employment:

    1. Basic Weatherization Skills
    2. Air Sealing with the Blower Door
    3. Daily Safety Test Out
    4. High Density Wall Insulation
    5. Lead Safe Work Practices
    6. Mold and Moisture Assessments.

Certified technicians including building analyst, building technician crew leader, building technician crew, and heating technicians will be required to attend one regional refresher course per year.

As a reminder all staff and/or contractors must attend Lead-safe Work Practices and Mold and Moisture Assessment as required by DOE.

Minimum training hours and/or certification testing is not required for the following job functions:

- Clerical staff and intake workers
- Heating System Installers who are **not** performing diagnostics on furnaces, but responsible solely for the installation of new furnaces
- Furnace crew technicians assisting the lead furnace technician
- Additional workers who are performing other work as necessary (electricians, appliance installers, plumbers, boiler specialists, and exterminators).

603 CERTIFICATION CLASSIFICATIONS

Several job classifications are required to pass certification within the first year of employment. Each individual needing certification must take the Building Performance Institute (BPI) field test and written examine during the first twelve months of employment in the weatherization program. If the individual is not successful at certification and has taken the test on or before the twelve month certification period, the Weatherization Administrator may request a 120 day extension for certification from IHCDA. The one-time 120 day extension per individual certification classification must be submitted in writing to a Community Development Administrator and a Monitor. The

request must include a work plan from the Weatherization Administrator detailing how the individual(s) will come into full compliance during the 120 day extension period. If the extension policy is followed by the Weatherization Administrator and granted by IHCDA, the non-compliance policy detailed in Section 604 of this manual will not be enforced for the extension period.

It will be the responsibility of the Weatherization Administrator to ensure that classes needed to pass competency testing are attended by appropriate personnel. Weatherization Administrators working with contractors and staff that are new and in the process of being certified, should make sure that technicians have the proper training prior to working on homes and furnaces.

The State of Indiana requires that certification through the Building Performance Institute (BPI) be obtained within the first year of employment in the following three areas:

1. **Building Analyst (BA) for Auditors -** all Weatherization Administrator auditors who perform initial, final, and new furnace installation inspections are required to pass the BPI BA test.
2. **Building Technician (BT) for Crew -** crew person (agency staff or contractor) performing shell work, air sealing, and insulation work is required to pass the BPI BT test.
3. **Heating Technician (HT) for Furnace Technicians –** a Heating Technician is defined as the individual actually conducting the cleaning, tuning, along with performing diagnostics (as to heat rise, carbon monoxide, draft under worst case, heat exchanger integrity, limit switches working properly, etc.) to ensure that all combustion appliances are properly performing, that adequate materials were used on repairs and equipment is operating as safely as possible. Individuals conducting the cleaning and tuning, along with diagnostics, and testing of the heating equipment are required to pass the BPI HT test. **If the Heating Technician is also the Building Analyst, then the BA must pass the BPI HT test in addition to the BA test.**

Weatherization Administrators must track the dates of hire for those employees and contractors who begin working after April 1, 2001 to ensure that those individuals meet their required training and/or certification. It is an unallowable program expense for agencies to submit claims for work that was completed by uncertified staff or contractor personnel, unless the twelve month grace period or extension period is in effect.

Monitors will review agency compliance through the reporting software, files, and the training report. In addition, it is the responsibility of the agency to identify within the client file each individual who completed the shell and furnace work, completed diagnostics of the home, and who evaluated the combustion appliances.

Certification and re-certification assessments for all classifications will be offered on a quarterly basis. Those individuals who do not pass competency testing will be offered a personal de-briefing to determine areas of weakness per feedback from BPI. An action

plan will be formulated to provide the training required to prepare the candidate for another attempt at certification. Re-enrollment in certification should be made at the next certification opportunity.

Weatherization Administrator staff certification is valid for three years and re-certification must occur prior to expiration. Weatherization Administrators are responsible for tracking testing and due dates for re-certifying staff and should begin the process of re-certifying staff and contractors at least six months before the expiration of the initial certification. This will allow for staff that may be unsuccessful on their first attempt, to attend classes that will help them with re-certifying in their field of expertise.

604 COMPLIANCE ISSUES

If an agency fails to meet training and certification requirements during the twelve month or extension periods, a work plan must be submitted to IHCDA detailing timelines for when and how the agency will come into compliance. Until certification and training specifications are met, the Weatherization Administrator will only be allowed to claim 5% of their total expenditures in administrative costs for the year. This will be effective for DOE, LIHEAP, and SWEEP programs.

Payment on all weatherization claims will be stopped for Weatherization Administrators that have not submitted a work plan within thirty days of non-compliance. In addition, if an agency has not met the work plan by the end of 120 days, the State will begin the process of transferring the weatherization program to another Weatherization Administrator. The transfer of the program will be for one year for each funding source in weatherization.

605 SUGGESTED COURSES BY JOB TYPE

The following is a list of suggested trainings for different job functions. All classes marked with an asterisk (*) indicate that Certification Lab components are offered. On the job experience is critical to performing well on certification testing and the indicated classes are the minimum needed to pass competency evaluations.

Job Classifications and Suggested Training

Building Technicians (BT):

- Basic Weatherization Skills *
- Best Approaches for Mobile Home Weatherization
- Daily Safety Test-Out Procedures *
- Red Cross CPR and First Aid
- Air Sealing with the Blower Door *
- Duct Diagnostics and Repair
- High Density Sidewall Insulation *
- Applying Pressure Differential
- Lead Based Paint *

Building Analyst (BA):

- Basic Weatherization Skills *
- Residential Energy Auditing *
- Best Approaches for Mobile Home Weatherization
- Introduction to Infrared Thermography
- Gas Heating Systems for Auditors *
- Water Heater Safety and Rehabilitation
- Wood Stove Safety Seminar
- Weatherization Client Education
- Daily Safety Test-Out Procedures *
- Red Cross CPR and First Aid
- Safety Program Management
- Gas Range Testing and Repair *
- Furnace Replacement and Sizing Criteria
- Venting Problems and Sizing Seminar
- Oil Furnace Training
- Air Sealing with the Blower Door *
- Duct Diagnostics and Repair *
- High Density Sidewall Insulation
- Electric Furnace Inspection and Repair
- Applying Pressure Differential *
- Lead Based Paint

Heating Technicians (HT):

- Gas Heating System Inspection for Technicians *
- Gas Range Testing and Repair
- Basic Gas Furnace Electrical Training
- Furnace Replacement and Sizing Criteria *
- Carbon Monoxide Mitigation
- Venting Problems and Sizing Seminar
- Oil Furnace Training *
- Duct Diagnostics and Repair *
- Electric Furnace Inspection and Repair

Additional Training Hour Credits

Conferences serve to expand the base knowledge of staff and in some cases provide a different training perspective. Participation at DOE regional and national conferences, as well as, Affordable Comfort will count as training hours. The formula used to determine the number of hours that will be applied for attending conferences is based on the number of hours for the core conference, the number of sessions available, and the level of technical information provided. In addition, those attending training outside of INCAA may submit verification of that training to the Monitor assigned to your agency for review. These classes will be added to training hours, as appropriate.

Weatherization Administrators must maintain documentation of training for each staff person, contractor, or auditor who works directly on Weatherization Assistance Program (WAP) homes. It will be the Weatherization Administrators' responsibility to ensure that contractors meet the training/certification requirements, and that contractors are advised of these requirements prior to procuring services with them. **Sales meetings will not count as training.**

SECTION 700

MONITORING

701 QUALITY ASSURANCE

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

- 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
- Innovative technological advances are promoted.

702 STANDARDS AND PRACTICES

The following describes the practices of the IHCDA monitoring staff in reviewing the appropriate documentation to determine local agency compliance. IHCDA staff may use alternate procedures or request additional information to verify compliance when it is necessary or appropriate. Full copies of the monitoring tools used by IHCDA staff can be found in the rear of this manual *Appendix G*.

- **Program Administration –** IHCDA 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.
- **Training and Licensing -** IHCDA monitors will review whether the Weatherization Administrator is using appropriately trained/certified staff to perform various job functions. The use of subcontractors will be reviewed to determine compliance with job function training requirements as outlined in Section 600 of this manual. Monitors will also review contractors for compliance with local licensing standards. Agency lead based paint practices will also be reviewed.
- **Database Input –** A selection of the client files are checked to ensure information from the client files is getting entered into the weatherization software accurately and completely.
- **Fiscal –** IHCDA will be checking for appropriate payment processing as specified in Section 501 of this manual. Monitors will also be looking at grant utilization to make sure funding is utilized in allowable combinations, that Weatherization Administrators have made use of all utility dollars first, and that the back-up documentation provided with claims is appropriate to the claim made.

- **Client File Review –** Files will be pulled at random from completions entered into the weatherization software. These files will be checked for correct forms, accurate information, appropriate work processes, and eligibility verification. Monitors will also request a sampling of deferred files to review for appropriate documentation and appropriate deferral.
- **Field Inspections –** IHCDA staff will conduct on-site inspections of a sample of dwellings pulled from the file review. 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 IHCDA. The local agency is responsible for quality control on all completed units and the final inspection completed by certified staff or contractors attests to the level of quality, professionalism, and appropriateness of all measures performed. The field inspection will cover appropriateness of: Base Load, Shell, and Health and Safety measures. During the field inspection, IHCDA staff will be checking for all invoiced materials, justification for the number of labor hours charged, initial and final audit detail, and accuracy of agency diagnostics. The monitor will provide guidance for improving procedures in the delivery of services.
- **Training and Technical Assistance (T&TA) –** Agencies will receive T&TA primarily through the Indiana Community Action Association. The purpose of T&TA is to provide agencies with assistance in the technical aspects of the weatherization program. IHCDA monitors are available for consultation via the phone or email on a daily basis, but on-site visits will need to be coordinated with INCAA training personnel. If agency personnel feel it necessary, and time allows, IHCDA monitoring personnel may be available for T&TA visits on a limited basis.
- **Quality Improvement Plan –** Program and/or Technical Monitoring visits uncovering serious, numerous or recurring findings may result in the agency being placed on a 120-day Quality Improvement Plan [QIP]. The intent of the QIP is to help the agency improve the areas of deficiency. As part of the QIP, IHCDA monitors will make additional visits to the agency during the 120-day period to ensure changes are being implemented and all noted findings are being resolved. IHCDA also reserves the right to issue a modified QIP, which could encompass fewer visits or a modified timetable.

An exit conference will be held with program and agency management at the end of each weatherization monitoring visit. For technical monitoring visits, an exit conference may be delayed, conducted via telephone or other means as situations permit and the parties agree. Exit conferences will summarize findings and concerns that were discovered during the review. Suggestions for improvement may be offered and if necessary, required follow-up actions will be stated. The exit conference allows agency staff and the monitor(s) to discuss informally what will be included in the monitoring report.

The visit will be followed by a written report due to the Weatherization Administrator within thirty days of the exit interview. Weatherization Administrator's will have forty-five days to respond in writing to the monitoring report. Failure by the Weatherization Administrator to respond in writing to the monitoring report during the forty-five day period may result in claims being held by IHCDA until receipt of response.

IHCDA reserves the right to question all associated costs and require that the Weatherization Administrator repay misspent grant funds to IHCDA out of private agency funds or federal dollars. Repayment will be required if charges are found to be fraudulent, insufficient justification for work done, or gross negligence is evident, resulting in a dangerous condition for a client.

703 American Recovery and Reinvestment Act of 2009 [ARRA]

- All sub-grantees working in conjunction with IHCDA to provide services through the Weatherization Assistance Program [WAP] or the Home Energy Conservation Program [HEC Program] shall be held accountable to all monitoring requirements outlined above.
- IHCDA will, as necessary, utilize third party agencies to perform quality assurance monitoring for sub-grantee work performed with WAP or ARRA funding.
    - IHCDA, through a third party monitoring agency, will monitor 10% of all client files and 10% of completed homes.
- IHCDA staff will be re-inspecting 10% of all third-party inspections, thus agencies can expect that roughly 1% of all units completed will receive two inspections by monitoring staff.