

**The Weatherization Assistance Program  
Policy and Procedures Manual  
December 2016**

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## INTRODUCTION AND OVERVIEW

The Weatherization Assistance Program (WAP) is administered through the state by the Georgia Environmental Finance Authority (GEFA). Funding for the WAP comes from the United States Department of Energy (DOE) and the Department of Health and Human Services (DHHS).

The purpose of the WAP is to assist low-income families who lack resources to invest in energy efficiency. To meet this need, GEFA contracts with local weatherization sub-grantees to provide energy conservation measures. Sub-grantees consist of non-profit Community Action Agencies (CAAs) from around the state. Agencies under contract to provide WAP services may have their own weatherization workers or crews, or they may utilize private contractors. In either case, the local administrator is ultimately responsible for the weatherization services provided.

Each year, GEFA must submit to DOE a State Plan for how the WAP will be administered within Georgia. Prior to being submitted to DOE, the State Plan is reviewed by the Policy Advisory Council, which is made up of representatives from agencies such as the Georgia DHHS and Southface Energy Institute. 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 Georgia is the grantee of the DOE, it has the responsibility to ensure that services across Georgia have uniformity and that an applicant will be treated equitably in any service area.

The system that GEFA employs to ensure quality of service is an extensive training and monitoring plan implemented with GEFA staff. Each individual sub-grantee is regularly monitored for compliance by state monitoring personnel evaluating the agency's performance in the provision of the weatherization program.

## **THE GEORGIA WEATHERIZATION ASSISTANCE PROGRAM POLICIES & PROCEDURES MANUAL**

The Georgia Weatherization Assistance Program (WAP) Policy and Procedures Manual is designed as a comprehensive reference on policies and procedures for the management of the WAP. The manual provides the following:

- Information regarding the WAP policies mandated by the state and federal government
- Procedures necessary for the operation of the WAP
- Instruction for completion of required forms

The Georgia WAP Policies and Procedures Manual is a living document that is reviewed and revised by staff and program users as needed.

## PROGRAM ORGANIZATION

### Federal

The United States Department of Energy (DOE) is responsible for the federal administration of the Weatherization Assistance Program (WAP). The program is administered in accordance with 10 CFR, Part 440, Subpart D, of the DOE regulations.

### State

The Georgia Environmental Finance Authority (GEFA) Division of Energy Resources is the grantee for the state of Georgia and is responsible for statewide coordination of the WAP. Its specific responsibilities are:

- To plan and administer the statewide WAP subject to monitoring by the DOE.
- To negotiate sub-grantee contracts to provide assistance on the local level.
- To transmit program policy and appropriate materials to sub-grantees.
- To provide a monitoring system to regularly evaluate sub-grantee performance.
- To assist sub-grantees in the development of corrective action plans when appropriate.

GEFA will enforce the rules, regulations, and mandates governing the responsibilities of sub-grantees in the operation of the WAP. If a sub-grantee fails to take appropriate corrective action in noted programmatic activities, GEFA reserves the right to take appropriate action.

### Local Agencies

Sub-grantees administer the WAP on the local level. They are the first point of contact for most program participants and are the primary contact for building owners and low-income households. They perform most of the functions necessary to meet program goals and follow procedures to ensure compliance.

Sub-grantees are responsible for ensuring that WAP funds are only expended on eligible activities and on behalf of eligible households. Sub-grantees bear the prime responsibility for meeting the energy conservation and technical performance goals of the program. Together with GEFA and other program partners, such as technical support providers, sub-grantees foster the technical advancement of the program and provide the public “face” of weatherization. Sub-grantees are also responsible for cooperating with GEFA to provide information to DOE, other state agencies, and the public.

Sub-grantees, by contract with GEFA, are responsible for meeting all of the terms and conditions of this manual and other contract documentation. Any sub-grantee with questions on any provision in this manual is encouraged to contact GEFA.

## PROGRAM FUNDING

The Weatherization Assistance Program (WAP) in Georgia has two primary funding sources: the United States Department of Energy (DOE) and the United States Department of Health and Human Services (DHHS). A portion of the state's allocation of the Low Income Home Energy Assistance Program (LIHEAP) funds is used to fund the WAP. This manual also describes the state's response to sub-grantee non-compliance, including recoupment or reduction of funding, sub-grantee probation, and sub-grantee termination.

### DOE Funding

DOE distributes funding to the states based on a formula which takes into account income eligible population and climate conditions. Policies and procedures of the WAP are governed by federal statute and by regulations set forth in Title 10 CFR Parts 440 and 600 as well as periodic grant guidance from DOE.

### DHHS Funding

Additional funds for GEFA for the WAP are provided through the Georgia DHHS which receives an allocation of LIHEAP funds from the U.S. DHHS.

### Funding Formula

The grantee will ensure that funds are allocated to areas based on relative need for the project. GEFA will have direct contracts with Community Action Agencies (CAAs) to implement the WAP. These sub-grantees will ensure that WAP services are available in all 159 of Georgia's counties. Some providers may utilize non-profit partners to carry out the work of the weatherization program.

To form a basis for distributing funds among the sub-grantees, a two-part formula is used for allocating the federal funds used in weatherization. The two-part formula takes into consideration low-income families and geographic area (square miles). The formula uses the county as the basic building block. The data is taken from the U.S. Census. The county data is assembled to reflect the total area served by a sub-grantee which is expressed as V1 and the total number of low-income families served by a sub-grantee which is expressed as V2. To maintain the priority of servicing low-income families, the variables are weighted. Each area receives a weighted value of 0.2, and a weighted value of 0.8 is assigned for the number of low-income families in a given area. The combination of the weighted variable {i.e.  $(V1 \times .2) + (V2 \times .8)$ } yields a "sub-grantee factor." When divided by the summation of the sub-grantee factor, it produces a funding level requirement expressed as a percentage. The percentage is then applied to total estimated funds available, not including carryover, to decide the estimated allocation for each sub-grantee. Allocation of funds to sub-grantees and across budget categories will be based on the base formula and will not require additional public hearings.

### Redistribution Provision

GEFA retains the right to allow for reallocation of funds to sub-grantees and across budget categories using the same formula as originally proposed or any other funding plan that meets the needs of targeted Georgia citizens. This can be done without holding additional public hearings. Active management and reallocation of the grant allows the grant to be fully expended during the budget period. Details about termination and corrective action plans for sub-grantees are described in the Monitoring Section of the State Plan approved by DOE.

## **POLICY ADVISORY COUNCIL AND STATE PLAN**

### **Policy Advisory Council**

As required by federal regulations, a Policy Advisory Council (PAC) assists in the development and implementation of the Weatherization Assistance Program (WAP) and advises the Georgia Environmental Finance Authority (GEFA) on a broad range of issues relating to the WAP. The PAC broadly represents organizations that provide services to low-income persons in Georgia. PAC meetings are held regularly throughout the contract/budget period. Travel by PAC members to PAC meetings is reimbursed by GEFA. GEFA retains the right to remove members from the PAC if they are consistently unable to attend meetings and conference calls.

### **State Plan**

A WAP State Plan is developed annually by GEFA as part of the state's application for federal WAP funds. The State Plan is used as an overall guide for program operation and outlines the state's objectives for the expenditure of funds received from the Department of Energy (DOE) and the Department of Health and Human Services (DHHS). It identifies the local sub-grantees contracted, projects the allocation to be awarded to each local sub-grantee, and lists the number of units expected to be weatherized during the annual budget period.

Before the State Plan is submitted to the DOE for approval, it is reviewed by the PAC. Public hearings are also held to obtain comments on the State Plan. These hearings provide an opportunity for local sub-grantees, communities, and residents to have input regarding current program operations, as well as the identification of needs and potential new WAP service providers. The final State Plan is submitted to the DOE for approval after comments are received. The approved State Plan becomes a part of the WAP contract.

## ADMINISTRATIVE PROCEDURES

### Grant Award

All sub-grantees receiving a grant award from the Georgia Environmental Finance Authority (GEFA) for providing weatherization services are bound by the grant award documents which include the contract, payments, and financial reporting requirements. Specific procedures must be followed to initiate grant activities, to receive payments or reimbursements for expenditures, and to report financial and program activities. The issuance of all grant awards for the weatherization program shall be governed by:

- DOE 10 CFR 440 - Weatherization Assistance for Low-Income Persons/Final Rule
- DOE 2 CFR 200 - Financial Assistance Rules
- DOE 2 CFR 910 to apply to for-profit organizations

When the sub-grantees sign the contract, the terms and conditions become the agreement between the sub-grantee and GEFA. Should a sub-grantee decline a contract or fail to acknowledge acceptance of an award, GEFA shall release the funds obligated for that award. If this should occur, GEFA shall provide the sub-grantee written notice of the intent to release funds. "Release of Funds" is defined as de-obligating the funds from the accounting system in GEFA. After the sub-grantee has been notified, procedures to select a new sub-grantee for that area may be implemented in accordance with GEFA's state plan.

### Contract Management

Annual budgets are based on estimated production of a minimum number of units at the maximum average cost per unit. Department of Energy (DOE) regulations require that reimbursements cannot exceed actual expenditures on weatherized dwelling units. However, any sub-grantee that completes dwelling units at a cost per unit that is less than the average cost per unit in their last approved budget for that budget period must complete additional dwelling units to fully expend the amount budgeted for materials, labor, and program support to be eligible for full reimbursement of these expenditures for that budget period.

Sub-grantees are required to monitor their expenditures and production throughout each budget period and make any adjustments necessary to complete their production goal and fully expend their budget period allocation. Sub-grantees should assess their expenditures and production monthly. This should include expenditures and production to date as well as any anticipated expenditures and production through the end of the budget period. If this assessment shows it is unlikely that the budget will be fully expended or production goals will be completed by the end of the contract period, GEFA should be consulted to determine whether a budget amendment or reduction in allocation for that contract period should be submitted.

Sub-grantees are responsible for the completion of the contract/budget goals regardless of participation in any other projects by the sub-grantee.

### Budget Amendments

GEFA will allow weatherization efforts to be funded by more than one funding source. When homes are dual-funded, they will be reported in the Hancock Energy System (HES) in each of the grants identifying the measures and the amount funded for that particular grant. The budget, budget narrative, and production schedule shall be used as the financial plan to operate the weatherization program. Grant expenditures shall be in accordance with the approved budget and detailed budget narrative. The sub-grantee shall



request a budget amendment for any line item changes. Budget changes must be submitted no later than 60 days prior to the termination of the grant award.

**Note:** The administrative budget line item cannot be exceeded. Administrative costs which exceed the approved percentage of expenditures for administration shall be considered “Unauthorized Costs.”

### **Scope Modifications**

The sub-grantee shall obtain prior approval for any changes to the scope or objectives of the approved project. The sub-grantee must complete the minimum total number of homes required on or before the ending date of the project period. If the sub-grantee cannot complete the minimum production in accordance with the approved production schedule, written communication shall be sent to GEFA stating the reason(s) why production goals cannot be met. Failure to comply may result in withholding of cash payments until the sub-grantee is in compliance with the approved production schedule.

### **Grant Award Payments**

Sub-grantees will be funded in a timely manner to facilitate the purchase of approved materials and qualified labor. GEFA shall use the reimbursement method of payment for costs incurred in providing weatherization services. A cash request for funds must be limited to the immediate cash needs of the recipient. Payments will be made via Electronic Funds Transfer.

### **Working Capital/Advance Payments**

Working Capital Advances (WCA) may be provided to sub-grantees at GEFA’s sole discretion. In order to be considered for a WCA, a sub-grantee must submit a hardship request detailing their current and projected financial position through the contract period of performance. Request for an advance may not exceed the contractor’s planned expenditures. GEFA will only provide enough capital for the contractor to satisfy initial startup costs and other expenses, typically for a one-month period. Written justification and prior approval is required for advance payments exceeding one month’s projected outlays. After all of the required signatures are obtained on contract documents and a hardship request from the sub-grantee is approved, advance payments may be given to the sub-grantee.

Advances must be maintained in a separate interest-bearing checking account. All interest earnings must be reported to GEFA upon receipt of the bank statement, retained as a part of program income, and returned to GEFA. The advance will be redeemed upon submission of the initial month’s expenditure report. Any overage in the advance will be electronically debited from the contractor’s account where funds were initially deposited. Email notification will be sent to the contractor advising the amount to be deducted three business days prior to transaction date. Sub-grantees must submit their request using the Contractor Cash Advance Request Form for the reimbursement invoice and also submit a justification for requesting the additional advance. Additional advances will be approved to meet occasional special needs that require exceptional production demands. Payment is contingent on the date federal funds are received and deposited by GEFA. If federal funds are delayed, sub-grantees shall be notified by GEFA.

### **Procedure for Working Capital/Advance Payments**

Complete and submit to GEFA an advance request using the Contractor Cash Advance Request Form. Advanced funds must be treated in accordance with generally accepted accounting principles, reported as advanced/deferred revenue, and realized only as eligible expenses are recorded. Submit written justification if requesting an advance payment exceeding 10 percent of the total program budget. Sub-grantee files must include the following documentation:

- Copy of the binding agreement
- Original copy of the submitted advance request
- Original copy of the written justification submitted to GEFA if requesting an advance payment exceeding 10 percent of the total program budget
- A monthly report of interest earnings on advanced funds
- Copy of the bank statement and project general ledger to verify cash on hand for the funds previously advanced and recorded expenses
- Actual expenses submitted by each contractor on a monthly or on an as needed basis to verify dollars expended on the program

### **Invoicing/Reimbursements**

Sub-grantees shall report monthly financial and program data to GEFA. Reimbursements may be made for actual expenditures in accordance with the sub-grantee production schedule. Complete and accurate reports must be postmarked by the 10th day of each month or by the first working day thereafter if the 10th day falls on a weekend or holiday. Statewide implementation of the HES enables the state to obtain all the information needed online. On a monthly basis, sub-grantees must submit the following to GEFA:

- Electronic request for a payment & statistical report
- Measure invoice
- Original printed and signed fiscal report
- Electronic Building Weatherization Report (BWR) for completed homes

On an annual basis, within 45 days of the end of the program year, sub-grantees must submit the following to GEFA:

- Electronic final fiscal report
- Yearly equipment inventory (vehicles, equipment)
- Physical inventory report

Reports will account for all funds, property, and other assets. Reports must be originals and contain signatures of all appropriate persons. Information reported must be consistent and relevant throughout all reports submitted. Reports submitted which contain substantial errors or insufficient information shall be returned to the agency for corrections.

### **Electronic Reporting**

Utilization of the electronic reporting system is mandatory for all WAP sub-grantees. Criteria for determining reimbursements include, but are not limited to, the following considerations:

- Agency expenses
- Cash balance at agency and state level
- Homes in progress
- Inventory balance
- Agency request negotiation with agency

A delay in issuing a payment could result from:

- Inaccurate reports
- Untimely reports
- Unsigned reports
- Information submitted on the wrong report form
- Unavailability of federal funds due to drawdown or delay in receiving quarterly allocations

Sub-grantees shall be notified by GEFA weatherization program staff if payments will be delayed or if they will be different from the amounts requested.

### **Davis Bacon Reporting**

Davis Bacon reporting is no longer required with this program.

### **Audits**

All applicable weatherization sub-grantees which expend in excess of \$500,000 from combined federal sources on an annual basis are required to undergo a single audit annually by a licensed Certified Public Accountant. This requirement may be fulfilled by including weatherization grants in the agency-wide audit. The single audit must comply with the OMB Circular A-133 for the cost to be charged to the WAP.

The sub-grantee must submit one copy to:

Georgia Environmental Finance Authority  
Division of Energy Resources  
Weatherization Assistance Program  
233 Peachtree Street  
Harris Tower – Suite 900  
Atlanta, Georgia 30303  
Fax: 404-584-1069  
Email: [accounting@gefafa.ga.gov](mailto:accounting@gefafa.ga.gov)

GEFA fiscal staff will review annual independent audits and communicate request for corrective action plan to resolve any weatherization-related audit findings. DOE will review the audit when its staff monitors the state program.

## **INSURANCE REQUIREMENTS**

The sub-grantee shall purchase and maintain insurance to protect the sub-grantee, with the Georgia Environmental Finance Authority (GEFA) identified as a named insured, from claims set forth below which may arise from the sub-grantee's operations of the work:

- Claims under worker's compensation, disability benefit, and other similar employee benefit acts
- Claims for damages because of bodily injury, occupational sickness or disease, or death of its employees
- Claims for damages because of bodily injury, sickness or disease, or death of any person other than its employees
- Claims for damages insured by personal injury liability coverage which are sustained (a) by any person as a result of an offense directly or indirectly related to the employment of such person by the sub-grantee, or (b) by any other person
- Claims for damages because of injury to or destruction of tangible property, including loss of use
- Claims for damages because of bodily injury or death of any person or property damage arising out of the ownership, maintenance, or use of any motor vehicle
- Claims for damages due to loss of money or other property sustained through any fraudulent acts committed by any board members (officers) or employers

### **Liability Insurance**

Sub-grantees are required to purchase liability insurance in limits of not less than \$3,000,000.00 in the aggregate and \$1,000,000.00 per occurrence to cover general agency liability requirements for the Weatherization Assistance Program. Any deductibles and self-insurance retention may not be greater than \$25,000.00. Liability insurance procurement must be in compliance with applicable OMB Circulars. Subcontractors must provide their own coverage.

### **Pollution Occurrence Insurance**

Since regular liability insurance policies do not provide for many health and safety measures such as lead and other pollution occurrence items, the Department of Energy (DOE) strongly recommends Pollution Occurrence Insurance (POI) as a part of, or an addition to, general liability insurance. If a sub-grantee chooses not to obtain POI coverage and damage occurs because of not following all aspects of Lead Safe Weatherization, or there is a disturbance to any other environmental pollutants (i.e. asbestos), the cost of remediation, clean up, relocation, medical expenses, and any other resulting costs may not be charged to DOE weatherization and must be covered by another funding mechanism. GEFA shall authorize payments for the cost incurred by sub-grantees to obtain POI for weatherization projects for personal injury and for property damage. Minimum coverage of pollution liability is \$1,000,000.00 for each pollution condition with the general aggregate limit of \$1,000,000.00.

Certificates of insurance in accordance with the minimum statutory requirements must be on file with GEFA indicating coverage beginning prior to commencement of weatherization work. These certificates shall identify GEFA as the certificate holder and as the additionally insured, contain a provision that the insurer shall give notice that the coverage under the policies will not be canceled, and confirm GEFA's interest will not be affected until at least 30 days prior to written notice given to GEFA.

## **WEATHERIZATION DATA COLLECTION AND REPORTING DATABASE**

The Hancock Energy System (HES) is the sub-grantee's reporting vehicle and payment mechanism. Complete and accurate data for all weatherized buildings and dwelling units must be entered into the HES. Before a building or dwelling unit can be presented to the Georgia Environmental Finance Authority (GEFA) for payment, the sub-grantee must enter data that certifies:

- The building or dwelling unit is eligible to receive assistance.
- The applicable budget period and contract number is correctly entered.
- All work performed on the building or dwelling unit has been completed.
- A post inspection of the work has been conducted.

For specific instructions in using the HES Data Collection and Reporting Database, refer to the HES Weatherization Assistance Program's online user's guide, which is available from GEFA.

## PROGRAM INCOME

The Department of Energy (DOE) defines program income as any funds earned by grantees and/or sub-grantees from non-federal sources during the course of performing DOE weatherization work. The income generated must be used to complete additional dwelling units in accordance with DOE rules. Property owner (i.e. landlord) contributions and leveraged resources (i.e. utility or grantee funds) are not considered to be “program income” for the purposes of the Weatherization Assistance Program (WAP). Program income shall be:

- Retained by the sub-grantee.
- Added to funds committed to the grant.
- Used to further eligible program activities.
- Accounted for separately.
- Used up to ten percent for eligible WAP administration costs.
- Used up to ten percent for training and technical assistance.
- Given interest income to be retained by the sub-grantee and to be used at the discretion of the sub-grantee’s board.
- Reported to the appropriate grant as it is earned and as it is expended on monthly fiscal reports.
- Considered grant carryover if there is any unexpended program income at the end of the program year.

## **LEVERAGED FUNDS**

Funds from non-federal sources which are used in weatherizing eligible homes are considered leveraged funds and should be reported separately in the Hancock Energy System to the state. Leveraged funds may include landlord or owner donations, volunteer labor, or contributions by other non-federal sources.

## TRAINING AND TECHNICAL ASSISTANCE

Training and Technical Assistance (T&TA) activities are intended to maintain or increase the efficiency, quality, and effectiveness of the Weatherization Assistance Program (WAP). The Georgia Environmental Finance Authority (GEFA) offers training throughout the year and through on-site technical assistance on a variety of topics. When topics involve a change in existing WAP policies and procedures (e.g. new database, changes to audit protocols, etc.) or emphasize an important program area, sub-grantee attendance may be mandatory. On-site monitoring by GEFA staff or contactor(s) will provide firsthand, observable evidence for T&TA. When training is mandatory, the sub-grantee is expected to assign the most appropriate person to attend. GEFA may also approve training programs offered by other organizations.

Sub-grantees are expected to have at least one Quality Control Inspector (QCI) on staff. It is allowable to contract with an independent QCI and to share QCI resources between agencies when necessary.

T&TA funds may be used to train sub-grantee employees and contractors. When determining to pay for contractor training, sub-grantees must secure a retention agreement in exchange for training. The contract agreement should stipulate that, at a minimum, employees and contractors will work in the program for 12 months and should align with the cost of the T&TA provided. Examples of contractor/agency agreements can be found at [www.gefa.georgia.gov](http://www.gefa.georgia.gov). The activities listed on the following table can be considered eligible T&TA costs and can also be charged as either administrative costs or as program support costs.

Conferences	Registration, salaries, travel and lodging costs for conferences, seminars, workshops and on-site training
Staff Training	Costs to provide training and professional certification for sub-grantee staff including salaries for the duration of the training
Weatherization Equipment	Purchase of weatherization equipment
Membership and Subscriptions	Membership fees for weatherization-related organizations and subscriptions to trade papers and magazines
Computer/Electronic Media	Purchase of computer/electronic media equipment and cost of training sub-grantee staff to operate this equipment
Data Gathering	Costs directly related to gathering, compiling, or copying information to be used in providing fuel usage and savings analysis data, the cost of devices used to calculate fuel usage, and the cost of inputting data for a historical database to track previously weatherized units
Client Education	Development and distribution of client education materials such as meetings, workshops, presentations, video tapes, etc.

### **BPI Certification Requirements**

GEFA requires that certain sub-grantee personnel be certified by the Building Performance Institute (BPI) in certain professional positions. For further details on mandatory trainings, T&TA assistance, and approved activities, please see the current, approved GEFA State Plan, Master File, Section V.8.4., available at [www.gefa.georgia.org](http://www.gefa.georgia.org). **The cost to sub-grantees for certification may be charged to either, training and technical assistance, or to program support.**



## **PRIOR APPROVALS FOR CERTAIN EXPENDITURES OR WORK**

Prior written approval from the Georgia Environmental Finance Authority (GEFA) is required for the activities listed below:

- Request to purchase a vehicle
- Out-of-state travel by sub-grantee
- Weatherization of a building outside of a sub-grantee's specified service area in a joint venture to complete a building with another sub-grantee
- Purchase of capital equipment
- "Fuel switching" for a heating appliance replacement
- Participation in fee-for-service/Weatherization Assistance Program related initiatives
- Request to lease a vehicle
- Change in multi-family audit priorities
- Replacement windows
- Replacement doors
- Request to exceed the current, approved health and safety limit per home
- Request to exceed the maximum average cost per home set forth by Department of Energy guidelines
- Request for any rework on a home within the one-year warranty period
- Request for weatherization services to be performed on a unit occupied or owned by an employee of the sub-grantee

Failure to produce prior written approval by GEFA's program manager will result in denial of payment.

## ON-SITE FIELD AND FISCAL MONITORING

The purpose of monitoring is to ensure weatherization programs are being managed within federal and state guidelines and that eligible low-income families are receiving high-quality and appropriate weatherization of their homes. To achieve the defined goals listed below based on the guiding principles, GEFA staff will perform periodic monitoring review of the fiscal, programmatic, and field functions of sub-grantees.

### Goals of Monitoring

- Analyze whether the best possible program services are being delivered to the low-income population.
- Assess strengths and weaknesses of all aspects of the local program.
- Determine program compliance and accountability.
- Identify problems, deficiencies, and areas of improvement within sub-grantee operations.
- Advise agencies on how to correct any weaknesses and deficiencies.
- Assist agencies in their program operations and compliance with Department of Energy (DOE) and state regulations.
- Assess the need for training and technical assistance to improve sub-grantee service delivery, cost-effectiveness, and accountability.

### Guiding Principles

- Monitoring is intended to be a constructive process and will be conducted in a professional manner with consistency, fairness, respect, and timeliness.
- The Georgia Environmental Finance Authority (GEFA) Weatherization Assistance Program (WAP) staff is committed to fostering positive, open, and constructive working relationships. Monitoring services is a two-way educational experience that promotes interaction, feedback, and improvements to both the state and local components of the weatherization network.
- The GEFA WAP staff believes that sub-grantee weatherization staff share the same goals of optimizing program funds and resources to best serve the low-income population, striving for program improvement, and providing the most cost-effective and best quality program services.
- The GEFA WAP staff will promote improvement by providing technical assistance, reinforcing strengths, and sharing successes, innovations, best practices, and experiences encountered at other agencies.
- Monitoring reports will be consistent with, and based on, adopted program policies, procedures, and standards.

### Desktop Reviews

GEFA staff will review agency monthly reports and track agency production and expenditures on a monthly basis through the Hancock Energy System. Additionally, weatherization staff will review monthly reports for compliance criteria, including average costs per completed dwelling unit, percentage of production goals achieved, and percentage of grant and each line item expended such as health and safety expenditures. Sub-grantee audit reports will be reviewed annually by GEFA staff. GEFA staff will contact sub-grantees whose audit reports note program findings that will require responses and correction. Depending on the

severity of any problems reported, a sub-grantee may receive a follow-up monitoring review that concentrates on prior deficiencies and required corrective actions.

### **Fiscal Monitoring Visits**

Fiscal monitoring will typically occur once per year per local agency. Fiscal monitoring will be conducted by a designated GEFA fiscal representative. During the visit, the monitor will review all of the fiscal operations of the weatherization program. Functions of the fiscal monitoring includes but are not be limited to:

- Verifying reported expenditures by comparing periodic expenditure reports to sub-grantee records
- Reviewing the documentation of program income and leveraged funds
- Reviewing owner investment account and trial balances
- Reviewing source documentation for purchase of any items charged against the WAP grant
- Reviewing distribution of costs charged to more than one program
- Matching payroll costs for consistency with the latest approved budgets
- Reviewing records to trace material purchases from invoices to inventory, specified jobs, or programmatic reports
- Reviewing bid procedures and records
- Reviewing subcontract agreements, analyzing payment schedules to subcontractors, and verifying payments made to subcontractors
- Reviewing cash balances
- Reviewing the sub-grantee's internal control structure
- Reviewing the sub-grantee's compliance with insurance requirements
- Reviewing and testing the sub-grantee's safeguarding of fixed assets

Each sub-grantee should have certain documents available for the GEFA fiscal representative to review such as:

- The current contract with the latest approved budget and approved budget amendments
- Subcontracts
- Lease agreements
- Bids, solicitations for bid, notifications of bid awards, and vendor lists
- Copies of required reports
- Books of account, including:
  - Cash disbursement
  - Cash receipts
  - Payroll sheets or ledgers
  - General ledger
  - General journal
  - Monthly general ledger trial balances
  - Monthly reconciliation to budget
  - Checking account reconciliations
  - Bank account authorization signature cards
  - A list of all unpaid bills tied to the appropriate budget line item for which the cost was incurred
  - Invoices for purchases made with grant funds, program income, and leveraged funds, if applicable.

Program management monitoring will typically occur once per year per local agency. Program management monitoring will be conducted by GEFA and will be program specific to the WAP. Functions of the program management monitoring will include:

- Reviewing client files
- Reviewing production, expenditures, and related compliance issues
- Reviewing material, tool, equipment, and vehicle property records and inventory
- Reviewing client flow charts and scheduling practices
- Reviewing crew safety policies and practices
- Reviewing insurance policies
- Inspecting warehouses

Field monitoring will be conducted by GEFA and will typically occur twice per year per sub-grantee. Sub-grantees demonstrating very good field work may only be monitored once. Individual job inspections will be performed and recorded using the Job Evaluation Form. Jobs will be inspected for overall effectiveness, workmanship, appearance, and compliance with installation standards. An overall assessment of agency field practices will be performed using the Weatherization Inspection Checklist. This tool will identify major strengths, major field findings, and trends for concern.

Major strengths are areas where field staff performs at a high quality level, including overall effectiveness, workmanship, crew organization and utilization, and teamwork. Major field findings are issues of significant concern and/or contract violations, such as major health and safety problems, potential liability from poor workmanship, consistent omission of required measures, or consistent failure to follow program rules, standards, or specifications. Trends for concern are recurring issues that may be of secondary concern, such as consistent small file omissions (no date on form), procedural items that can be quickly or easily corrected, or a finding in work quality that is easily correctable and does not significantly impact the overall results of work performed (for example, failure to wrap the first five feet of water pipe from the water heater).

### **Monitoring Procedures**

Monitoring visits will be scheduled by GEFA's weatherization and staff and scheduled in advance with the agency. The weatherization program manager will send a memorandum confirming the scheduled visit date.

Upon arrival at the agency, the monitor(s) will meet with the appropriate agency personnel to explain the purpose of the visit, the records and information needed, and the planned timeframe of the visit. **The weatherization coordinator must be available at all times during a monitoring visit at the discretion of the GEFA monitor(s).** At the conclusion of the monitoring visit, an exit interview will be conducted to review the monitoring analysis with the executive director, weatherization coordinator, and other personnel as deemed appropriate. The monitor(s) will provide the agency with a draft outline of concerns and findings observed.

Every effort will be made to mail a final monitoring report to the executive director and weatherization coordinator within 30 days of the monitoring visit. The agency will be given 15 days to respond to the recommendations and/or findings. GEFA will review the response and determine if the actions described

are appropriate and sufficient. GEFA may schedule a follow-up visit to verify agency actions or to further analyze unresolved matters.

### **Local Agency Inspection Responsibilities**

Local agencies are required to inspect all completed units to determine compliance with WAP quality standards and to ensure proper documentation of client information, job measures and costs, and other appropriate information. Inspections must be performed by a person who did not perform the actual work on the job. The thoroughness and effectiveness of agency inspections are considered important evaluation criteria and will be assessed during GEFA field monitoring visits.

### **Findings**

For the purpose of consistency, the following definitions will be used during monitoring visits and subsequent reports. Findings may result in additional training for the sub-grantee personnel.

Major finding: Noncompliance issues that are of significant concern, such as health and safety, eligibility, potential liability, misuse of funds, or consistently failing to follow program rules, standards, or specifications (such as whole house weatherization)

Minor finding: Noncompliance issues that are of secondary concern, such as small file omissions (no date on form), procedural items that can be quickly or easily corrected, or a finding in work quality that is easily corrected and does not significantly impact the overall quality of work performed (for example, failure to wrap the first five feet of hot water pipe from the water heater)

Reminder: Issues that are considered minor and may be communicated verbally to the agency during the monitoring visit (on-site technical assistance) or during the exit interview. These are intended to assist with compliance of program requirements and to improve service.

Findings from the first monitor visit will determine the need for a second visit. Factors influencing the need for a second visit include past monitoring results, the service provider's program funding and production level, and the completeness of the monitoring. During the DOE American Recovery and Reinvestment Act program year, monitoring will take place monthly.

### **High Performance**

During the monitoring review, an agency demonstrates performance standards that meet or exceed those commonly observed in the following areas:

- No more than one (1) health and safety finding as identified in a previous monitoring report
- No more than one (1) procedure findings related to program policies and procedures
- No annual program specific audit findings
- Timely and correct monthly reports
- Comprehensive service utilizing the latest hot climate standards in a cost-effective manner in accordance with GEFA guidelines

### **Standard Performance**

GEFA expects every agency to meet these standards of performance:

- Compliance with major program requirements, such as lead-based paint procedures, cost allocation plan/indirect rate, required contractor information
- No more than one program specific finding in the annual audit
- Well-trained staff in performance and specific job duties
- Complete and organized files
- Complete scope of work
- Use of priority list
- Demonstrated proficiency by staff and contractors in technical applications such as diagnostics
- Maximum of two (2) procedural findings (as related to program policies and procedures) and health and safety findings from previous monitoring report with the severity of such findings
- Compliance with safety rules
- Professional working relationship with GEFA
- Past corrections made and reported in a timely manner
- None of the elements identified in the At-Risk category are present

### **At-Risk Performance**

An agency can be placed on “At-Risk” status for serious management and/or consistent sub-standard field performance, including but not limited to:

- Program goals not being met
- Program resources not accounted for
- Serious indications of misuse of funds, fraud, or theft
- Non-compliance with program policies and procedures
- Severely incomplete and disorganized agency files and records
- Repeated major field findings with minimal or no improvement from previous monitoring visit
- Unresponsiveness to GEFA requests and deadlines

When placing an agency on “At-Risk” status, GEFA will specify improvements that must be made by the agency. The agency will submit a plan to identify the steps and timeframe to make the noted improvements. When appropriate, related training and technical assistance will be provided. GEFA will consider suspension or termination of the weatherization contract unless the specified improvements in management and/or field practices are instituted by the agency in a specified period of time.

### **Appeals of Monitoring Reports**

A sub-grantee may appeal the findings of the monitoring visit to GEFA’s Weatherization Senior Program Manager. This appeal should be sent in writing within 30 working days after receipt of the inspection report. A sub-grantee who does not agree with the initial outcome of the monitoring report appeal may submit a subsequent appeal to GEFA’s Executive Director.

## **TRAINING & CERTIFICATION REQUIREMENTS**

Georgia's Weatherization Assistance Program will follow the Tier 1 and Tier 2 training categories as outlined in the Weatherization Program Notice (WPN) 15-4 Quality Work Plan Section 4 and as required, will meet the National Renewable Energy Laboratory (NREL) Job Task Analysis (JTA). Sub-grantees are encouraged to re-certify their weatherization workers in accordance with this training plan at least six months prior to the expiration of the individual's certification date to ensure an adequate supply of Quality Control Inspectors (QCIs) as well as all other occupational specialties requiring certification.

The major objective of Training and Technical Assistance (T&TA) is to provide sub-grantees with the information and training required to administer and comply with Department of Energy (DOE) and state rules and regulations. The majority of the sub-grantees are anticipated to have at least one QCI on staff. Some may use an independent QCI contractor while others may use shared QCI resources from adjacent/network agencies.

### **Tier 1 Training**

Tier 1 training is a comprehensive, occupation specific training which follows a curriculum aligned with the JTA for that occupation. Tier 1 training must be administered by, or in cooperation with, a training program that is accredited by a DOE approved accreditation organization (e.g. Interstate Renewable Energy Council (IREC)). Several Tier 1 IREC accredited training providers are located throughout the country, and training is provided throughout the year and dependent upon the training providers' schedule. Several non-IREC accredited training providers are located throughout the state/country (i.e. state, regional and/or nation meetings/conferences, technical colleges, other for/nonprofit organizations, etc.). Sub-grantees are reminded that any out of state training activities must be approved in advance by GEFA. Tier 1 training courses including but not limited to:

- Home Energy Professional Crew Leader
- Home Energy Professional Energy Auditor
- Home Energy Professional Retrofit Installer
- Home Energy Professional Quality Control Inspector

### **Tier 2 Training**

Tier 2 training is a single issue, short term training addressing acute deficiencies such as dense packing, crawlspace, American Society of Heating, Refrigerating, and Air-Conditioning (ASHRAE) standards, etc. Conference trainings are included in this category. Tier 2 training courses are provided throughout the year and dependent upon the individual training providers' schedule. Sub-grantees are reminded that any out of state training activities must be approved in advance by GEFA. Tier 2 training courses including but not limited to:

- ASHRAE 62.2 (2013) Residential Ventilation
- Audit Assessment
- Blower Door & Duct Testing
- Building Science
- Combustion Appliance Zone (CAZ) Diagnostics

- Client Education
- CPR & Standard First Aid
- Crew Leader
- Dense Pack Walls
- Diagnostics
- Energy Auditor Testing Equipment
- Heating Ventilation and Air Conditioning (HVAC) Fundamentals
- Infrared Thermography
- Lead
- Safe Weatherization
- Manufactured Housing
- Fundamentals
- National Energy Audit Tool (NEAT)/Manufactured Home Energy Audit (MHEA)
- Occupational Safety and Health Administration (OSHA) 10
- Construction
- Renovator
- Initial Course
- Retrofit Installer Technician
- Weatherization Management

Georgia requires successful completion of certification training for all inspectors. Requirements include:

- Quality Control Inspection certification
- Manufactured Housing Inspection training
- Combustion Safety training
- Lead Safe Weatherization training
- OSHA 10 and 30 training

For current certified staff, the use of continuing education credits to maintain certification will be funded through T&TA funds. GEFA allocates T&TA funds to each sub-grantee for the mandated training, as needed.

In accordance with the DOE requirements, GEFA will meet the quality control inspector certification requirements. The sub-grantee assigned QCI will be required to seek training at an IREC accredited training provider.

GEFA management and sub-grantee staff will attend DOE mandated activities/events, National Association for State Community Services Program (NASCSPP) events, state weatherization managers' meetings, national DOE conference, and other staff development trainings as needed or required. The Annual Georgia Weatherization Workshop is a mandatory T&TA activity which includes all fiscal and technical program training. For other trainings and certifications, please see the current approved state plan on [www.gefa.georgia.gov/weatherization-program-documents](http://www.gefa.georgia.gov/weatherization-program-documents).



## REQUIRED FILE DOCUMENTATION

All files presented to the Georgia Environmental Finance Authority (GEFA) field monitor for review must include the following documentation:

- Weatherization Assistance Program (WAP) Application Form completed and signed by the applicant or designee
- Copies of documentation for income or categorical eligibility (**Documentation of client eligibility must be conducted by the sub-grantee prior to an energy audit and the weatherization of any dwelling unit. Multifamily units may not be weatherized until documentation is obtained for all eligible tenant and must be submitted to GEFA for approval.**)
- Client Authorization Form
- Tenant agreement (Authorization Form)
- Owner agreement (Authorization Form)
- Lead and mold pamphlet and signature sheet
- Agency warranty form that guarantees work and materials for one year
- National Energy Audit Tool (NEAT) and/or Manufactured Home Energy Audit (MHEA) when required
- Documentation of notification to owner(s) and client(s)
- Documentation of the initial field assessment/audit with the GEFA WAP Assessment Form
- Final inspection form with client/owner name, signature and date
- Documentation of prior approval waivers
- Refrigerator replacement form (if applicable)
- Required documentation for the Environmental Protection Agency (EPA) Lead Renovation, Repair, and Painting (RRP) Rule and Lead Safe Weatherization (if applicable)
- Combustion Safety Test Sheets (pre, in-progress, post)
- Accurate records of all materials installed
- Invoices for completed WAP work, including all materials purchased and any sub-contracted materials or labor
- Copies of bids and bid summaries for sub-contracted work
- Change orders
- Before and after photos
- Deferral documentation with photos
- ASHRAE 62.2 Ventilation Rate Calculator Worksheet
- Quality Control Inspection Form
- Justification for Heating, Ventilation, Air Conditioning (HVAC) and Domestic Hot Water (DHW) tank replacements
- Sizing calculations for HVAC replacements such as those defined in NEAT, Manual J, or other industry approved methods

## CONFLICT OF INTEREST

Sub-grantee staff acting either as individuals or on behalf of an outside contracting firm may not solicit or provide contractor services to clients who have received or been deemed eligible for Weatherization Assistance Program (WAP) services. Low-income clients seeking work from private contractors should be advised to consult with other sources. Sub-grantee staff who offer other energy or building repair services fees to the general public may not perform these same services for the sub-grantee.

Sub-grantee staff, who originally establishes a relationship with the client as a representative of the WAP, must not transition that relationship to one where they subsequently become a private contractor for the client. Sub-grantee staff engaged in private-contractor work outside of sub-grantee operations are also prohibited from using sub-grantee tools, vehicles, and equipment. They must have their own privately owned tools, vehicles, and any other equipment when doing any contractor work not otherwise prohibited.

Sub-grantees set up to perform services through a fee-for-service arrangement are not prohibited from providing such services as long as the sub-grantee and not an employee acting as an independent contractor is paid for the service in accordance with all appropriate requirements. The following examples illustrate work that may not be undertaken by sub-grantee staff.

### **Example A**

The auditor from sub-grantee A goes to a client's home to perform an inspection before the WAP work has begun. While explaining to the client about what the WAP will provide, the auditor indicates that new prime windows will not be included. The auditor states that he could install new windows, but the cost would have to be paid by the client. The client states they would be willing to pay for new windows installed by the auditor. The auditor returns at a later date and completes this installation as a private contractor.

When a sub-grantee operates a fee-for-service component to their program in accordance with the guidance provided elsewhere in this chapter, they may install windows through a separate agreement, with notification provided to the Division of Housing and Community Renewal (DHCR), but an auditor operating his own business may not contract separately with a client.

### **Example B**

An ad is placed in a newspaper advertising contractor services. The person providing these services is the director of the local WAP sub-grantee that also performs other contracting services on a part-time basis. The ad does not mention the local WAP program. A homeowner seeing the ad is interested in having their roof replaced and calls the contractor. A price is agreed, and while replacing the roof, the contractor mentions that he is also the director of the local WAP. The homeowner has never heard of the program but applies and is deemed eligible and is placed on the waiting list.

The initial agreement to install the roof was not a conflict of interest. But now that this homeowner has become a WAP client, the WAP director can no longer engage in any private contractor work for the homeowner. Since homeowner becomes a WAP client, he should be referred to other contractors for any subsequent service.

### **Example C**

An employee of the sub-grantee also has an automotive repair business. This employee cannot perform automotive repair work for the sub-grantee on WAP vehicles.

**Service to Employees or Relatives**

Sub-grantees should be aware that service to employees and relatives or the units owned by employees or relatives of employees may appear as a conflict of interest. As such, sub-grantees must obtain prior written approval from the Georgia Environmental Finance Authority. Sub-grantees should have written policies outlining how they prioritize and select employees and relatives of employees for service. Board members and senior agency staff may not directly or indirectly receive WAP assistance.

## MAINTAINING THE PRIVACY OF RECIPIENTS OF SERVICES

### **Purpose**

To issue guidance for the Weatherization Assistance Program (WAP) on maintaining the privacy of recipients.

### **Scope**

This guidance is provided to states or other entities, such as recently added territories, named in the Notification of Grant Award as the recipients of financial assistance under the WAP.

### **Legal Authority**

Title IV of the Energy Conservation and Production Act, as amended, authorizes the Department of Energy (DOE) to administer the WAP. All grant awards made under this program shall comply with applicable law including the Energy Policy Act of 2005, the Energy Independence and Security Act of 2007, the American Recovery and Reinvestment Act (ARRA) of 2009 and regulations contained in 10 Code of Federal Regulations (CFR) Part 440, 2 CFR Part 200, and 2 CFR 910 (specific to for-profit organizations and other procedures applicable to this regulation as DOE may, from time-to-time, prescribe for the administration of financial assistance).

### **Background**

States receiving funds under the WAP have been receiving numerous requests for information regarding the implementation of programs. The requests range from informal inquiries by local elected officials and other community leaders to requests for specific information about recipients by local and regional press outlets.

### **Policy**

DOE adheres to the transparency requirements placed on these and other government financial assistance programs. DOE will work diligently with any state WAP or local service provider to gather the required information and provide it to the requestor. However, DOE must comply with all requirements of the government to protect the privacy interests of individuals who participate in these financial assistance programs. In accordance with 20 CFR 2 Retention and access requirements for records, "Unless required by statute, DOE shall place no restrictions on recipients that limit public access to the records of recipients that are pertinent to an award, *except when DOE can demonstrate that such records shall be kept confidential and would have been exempted from disclosure pursuant to the Freedom of Information Act (5 U.S.C. 552) if the records had belonged to DOE.*" DOE would be legally required, pursuant to 5 U.S.C. 552(b)(6), of the Freedom of Information Act, to keep confidential any identifying information related to an individual's eligibility application for WAP, or the individual's participation in WAP, such as name, address, or income information. Thus, states and local service providers should extend that same protection to their client records. States may release information about recipients in the aggregate that does not identify specific individuals. For example, information on the number of recipients in a county, city or a zip code does not compromise the privacy of the recipients.

## **SUB-GRANTEE TERMINATION**

The Georgia Environmental Finance Authority (GEFA) may terminate a sub-grantee for failure to comply with the terms and conditions of their Weatherization Assistance Program (WAP) contract if GEFA determines that the termination would be in the best interest of the state. Reasons for termination include, but are not limited to, the following:

- Failure of work performance to substantially adhere to the requirements of the contract documents
- Refusal to proceed with the work or meet production and spend goals
- Disregard for laws, rules, ordinances, or regulations of the public authority
- Misuse of dedicated account funds, failure to pay vendors, failure to notify GEFA of fraud or the allegation of fraud, embezzlement, misappropriation, or abuse of funds
- Disregard for competitive bidding or other cases of severe conflict of interest

Whenever a GEFA representative uncovers significant problem areas with the work or actions of a sub-grantee, the GEFA representative must document such problem areas and provide a report to GEFA's Weatherization Senior Program Manager. If the problems can be resolved at the local level within 30 calendar days or an acceptable corrective plan is submitted, then no further penalty actions will be taken.

When the problems cannot be resolved at the local level or are not resolved within 30 calendar days, GEFA will transmit a sub-grantee Warning Notice to the sub-grantee board chairperson, weatherization coordinator, and Executive Director. The sub-grantee Warning Notice will cite specific section(s) of the WAP contract where compliance is in question with a requirement that the sub-grantee provide a written plan within 15 calendar days for curing the alleged non-compliance. If no response is received within those 15 calendar days, the plan for resolving the alleged non-compliance is unacceptable to GEFA, or the plan is not followed, a Notice of Default and Intention to Terminate the contract will be transmitted to the sub-grantee board chairperson, weatherization coordinator, and Executive Director. Failure by the sub-grantee to respond to the Notice of Default and Intention to Terminate within 15 calendar days will result in the issuance of a Notice of Termination of the WAP contract. With the Notice of Termination, a public review will be scheduled to inform the public of the termination of the sub-grantee and to identify a new sub-grantee to provide local service.

Notwithstanding any of the above, GEFA may suspend or terminate a contract without prior written notice upon a finding of substantial non-compliance or substantial breach of contract.

### **Appeals Process**

A sub-grantee that receives a Notice of Default and Intention to Terminate may request GEFA to reconsider its findings of default and decision to terminate the contract. The Request for Reconsideration must be in writing and submitted within 15 calendar days of the date of the Notice of Default and Intention to Terminate. The Request for Reconsideration shall include factual and legal arguments in support of reconsideration, any supporting documentation, and express consent for a neutral to be selected to review the Request. The Request must be submitted to the GEFA weatherization coordinator. If a Request for Reconsideration is not received by GEFA within 15 calendar days, GEFA shall issue a Notice of Termination to the sub-grantee.

Upon receipt of a timely Request for Reconsideration, GEFA will select a neutral to conduct an administrative hearing. The neutral may not be a person who generated the notice to terminate or participated in the decision to terminate. GEFA's weatherization program manager will provide the neutral with a copy of the Request for Reconsideration and Notice of Default and Intention to Terminate. Upon receipt of the foregoing materials, the neutral shall notify GEFA and the sub-grantee, in writing, the date, time, and place of the hearing. The neutral will establish a schedule for the exchange of any evidence. Evidence that is not submitted in accordance with the schedule and in advance of the hearing may not be used at the hearing.

At the hearing, each party will be afforded the opportunity to present its arguments and evidence in support of its respective position. The neutral shall set time limits and procedural guidelines for the presentation. The hearing shall be informal in nature, with no formal examination or cross-examination of witnesses. However, the presentation may be recorded at the request of GEFA. Each party has the right to be represented by legal counsel at its own expense. At the conclusion of the hearing, the neutral will issue a written evaluation. No later than 15 calendar days following the date of issuance of the neutral's evaluation, GEFA's Executive Director will review the opinions and recommendations expressed in the evaluation and make a final determination regarding contract termination. The final determination issued by GEFA's Executive Director constitutes the final step in the administrative appeals process.

## COMPLAINTS AND DISPUTES RESOLUTION PROCEDURES

A grievance must be filed in writing using the Client Complaint Form for a local agency to take action, except when a complaint can be resolved quickly.

### Procedure

**Level 1 (Sub-grantee):** Complaints must be in writing to allow the sub-grantee to take action. The client must complete a Client Complaint Form and state what part of the weatherization process was unsatisfactory with sufficient documentation of the problem. Once the Client Complaint Form and any documentation provided by the client have been received, the sub-grantee will:

1. Review the following:
  - a. Client Complaint Form and documentation provided by the client
  - b. Hancock Energy Software (HES) data or notes, household file information, and any other documentation
  - c. Pertinent federal/state rules and Weatherization Assistance Program (WAP) policies
2. Respond in writing within 10 business days to the client.
3. Include in its response the following:
  - a. Statement of the sub-grantee's findings and its conclusion
  - b. Any action the sub-grantee will take to resolve the issue
  - c. Information about additional options the client may have and provide the following information:
    - i. The request to the Georgia Environmental Finance Authority (GEFA) postmarked no more than 10 business days from the sub-grantee's decision.
    - ii. GEFA's address – 233 Peachtree, St NW, Suite 900, Atlanta, GA 30303
    - iii. Name/phone number of GEFA's Senior Weatherization Program Manager

**Level 2 (GEFA):** If the client is not satisfied with the sub-grantee's conclusion or action taken, they may send a written complaint to GEFA, which must be postmarked within 10 business days of the date of the sub-grantee's decision. GEFA will:

1. Notify the sub-grantee that GEFA received the complaint.
2. Request the sub-grantee forward all documents in the household file, including the client's complaint form and the sub-grantee's response. In addition, GEFA will review the most recent HES file data.
3. Review all documents/details relevant to the complaint.
4. Conduct a site visit, if necessary, at GEFA's discretion.
5. Request that the sub-grantee take corrective action, if applicable, in writing.
6. Insure that the sub-grantee will respond in writing to the client with GEFA's conclusion. Include in its response the following:
  - a. Statement of findings and its conclusion
  - b. Any actions that the sub-grantee will take to resolve the issue
  - c. Information about additional options the client may have

**Level 3 (U.S. Department of Energy):** If the client is not satisfied with the weatherization agency's conclusion or action taken, they may send a written complaint to the United States Department of Energy WAP project officer. The client should seek private counsel for additional remedies.

## OUTREACH AND PROMOTION

When promoting the Weatherization Assistance Program (WAP), sub-grantee publications and advertisements must include statements and/or information that the Georgia Environmental Finance Authority (GEFA) is the funding agency.

All sub-grantees must conduct outreach during the contract year. Outreach efforts must be made to provide information regarding the nature and existence of the program, eligibility requirements, making application and accessing the program. Outreach is essential so that all eligible households in their service area, including those with concentrations of minority groups or others that are not likely to apply without targeting outreach, are aware of the program. This may include outreach to neighborhoods or areas other than the one in which the sub-grantee is located. Sub-grantees must have written protocols describing their outreach efforts and client selection process that addresses the demographics of their service area with specific reference to how they identify and serve owners and renters and other populations with special needs.

The sub-grantee outreach should ensure that information on the WAP is readily available at all local human services and governmental agencies serving low-income persons and that the staff of those agencies are familiar with the WAP. Sub-grantees need to have an adequate number of clients available in order to provide WAP services to the number of dwelling units projected for any given year. In areas of the state where sub-grantees have a difficult time obtaining enough clients to fulfill their contractual commitment to GEFA, outreach for clients will play an essential role in the continuation of a separate WAP contract for that service area. In cases where outreach fails to produce an adequate number of clients, GEFA is committed to working with the sub-grantee and adjoining sub-grantees to consider the consolidation of service areas or to make other arrangements to provide services in that area.

Outreach efforts should be aimed at other public and private organizations providing similar services as well as directly to the public through various types of public service announcements.



## PRIORITY CLIENT GROUPS

Service to eligible clients must be provided on a first-come, first-serve basis in most cases. However, applications should be assessed with a number of priorities. Priority is given to program eligible disabled, elderly, elderly handicapped, households with children, and households with high heating utility bills. Preference points determine client position on the waiting list. The person with the most points will be placed at the top of the waiting list. Unsigned applications will be assigned zero points.

Category	Priority Points																					
<b>Age</b>	<p>4 points if the household contains any member under age 18 years or age 60 years or over.</p> <p>0 points if the household does not contain any members in those age groups.</p>																					
<b>Disability</b>	1 point for family member with a disability.																					
<b>Waiting Time</b>	<table border="1" style="width: 100%; border-collapse: collapse; margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: center;">Waiting Time (Months)</th> <th style="text-align: center;">Point(s)</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Less than 3</td> <td style="text-align: center;">1</td> </tr> <tr> <td style="text-align: center;">3 – 5</td> <td style="text-align: center;">2</td> </tr> <tr> <td style="text-align: center;">6 – 8</td> <td style="text-align: center;">3</td> </tr> <tr> <td style="text-align: center;">9 – 11</td> <td style="text-align: center;">4</td> </tr> <tr> <td style="text-align: center;">12 or more</td> <td style="text-align: center;">5</td> </tr> </tbody> </table>	Waiting Time (Months)	Point(s)	Less than 3	1	3 – 5	2	6 – 8	3	9 – 11	4	12 or more	5									
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12 or more	5																					
<b>High Energy Use/ High Energy Burden</b>	<p>High Energy Use/High Energy Burden are households with high energy bills. Calculate by using the <i>Current Monthly Household Energy Cost divided by Current Monthly Household Income = Percentage of Energy Burden</i>.</p> <p>Example:            Current Monthly Cost of Energy: \$100            Current Monthly Household Income: \$1000            100 divided by 1000 = 10% <i>Energy Burden</i></p> <table border="1" style="width: 100%; border-collapse: collapse; margin-left: auto; margin-right: auto;"> <thead> <tr> <th style="text-align: center;">Priority Group</th> <th style="text-align: center;">Energy Burden</th> <th style="text-align: center;">Point(s) Assigned</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td style="text-align: center;">35.1 - 50%</td> <td style="text-align: center;">6</td> </tr> <tr> <td style="text-align: center;">2</td> <td style="text-align: center;">25.1 – 35%</td> <td style="text-align: center;">5</td> </tr> <tr> <td style="text-align: center;">3</td> <td style="text-align: center;">15.1% - 25%</td> <td style="text-align: center;">4</td> </tr> <tr> <td style="text-align: center;">4</td> <td style="text-align: center;">10.1% - 15%</td> <td style="text-align: center;">3</td> </tr> <tr> <td style="text-align: center;">5</td> <td style="text-align: center;">5.1% - 10%</td> <td style="text-align: center;">2</td> </tr> <tr> <td style="text-align: center;">6</td> <td style="text-align: center;">0 - 5%</td> <td style="text-align: center;">1</td> </tr> </tbody> </table> <p>From the example above, the household has a 10% Energy Burden. Therefore, it would be assigned 2 points.</p>	Priority Group	Energy Burden	Point(s) Assigned	1	35.1 - 50%	6	2	25.1 – 35%	5	3	15.1% - 25%	4	4	10.1% - 15%	3	5	5.1% - 10%	2	6	0 - 5%	1
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1	35.1 - 50%	6																				
2	25.1 – 35%	5																				
3	15.1% - 25%	4																				
4	10.1% - 15%	3																				
5	5.1% - 10%	2																				
6	0 - 5%	1																				

### **Additional Priority Groups (when applicable)**

Sub-grantees may give priority to clients who fall into the following categories:

Emergency: When a genuine emergency exists which poses an imminent threat to the life, health or property of the client and when that emergency situation can be corrected by Weatherization Assistance Program services and when other options to correct or alleviate the threat are unavailable or impractical.

Elderly, Chronically Ill, Children: A priority exists when the household includes members who are elderly, chronically ill, or have children under 18.

State or Federal Declaration of a Disaster: In accordance with Weatherization Program Notice (WPN) 12-7 and in such instances that warrant a designation of an area or areas as a disaster area, clients identified in these areas may be offered general or specific services on a priority basis.

**If there is a situation where the sub-grantee is aware of an emergency of an unusual nature not covered above, the sub-grantee should call the Georgia Environmental Finance Authority (GEFA) for a case-by-case status determination.**

## CLIENT ELIGIBILITY AND INCOME CRITERIA

The Weatherization Assistance Program (WAP) is designed to benefit low-income persons, particularly the elderly, disabled, and families with young children. Under the Department of Energy (DOE) regulations, states or grantees must set eligibility requirements for participation in the WAP at 200 percent of the Federal Office of Management and Budget poverty level.

A determination of client eligibility will remain in effect, and no new documentation will be required for one year from the initial date of determination, unless the sub-grantee receives information that the client is no longer eligible. Household eligibility must be determined using the Priority for Service Delivery outlined in the approved State Plan. No other method is allowed. If it is established that the client intentionally provided false information regarding eligibility, all WAP work must be stopped and closed out at the cost incurred. The applicant must reapply for WAP services every 12 months. A household unit shall be eligible for the Weatherization Assistance Program (WAP) as follows:

- **Categorical eligibility** applies when one or more persons living in the unit has received cash assistance payments under Title IV or XVI of the Social Security Act or applicable state or local law at any time during the 12 month period preceding the determination of eligibility for weatherization assistance; or one or more persons in the unit is eligible for assistance under the Low Income Home Energy Assistance Act of 1981, provided that such basis is at least 200 percent of the federal poverty level.
- **Traditional eligibility** applies to any household whose income is at or below 200 percent of the poverty level determined in accordance with criteria established by the director of the Office of Management and Budget for the 12 months preceding application.

Federal poverty levels and definition of income is provided annually by DOE. Determination of income eligibility shall be based on the total income of all adult members residing in a dwelling unit. Income should be verified for a period of 12 months preceding the date of application. In accordance with DOE Weatherization Program Notice (WPN) 15-03, income data for a part of a year may be annualized in order to determine eligibility.

### Income Inclusions

Money, wages, and salaries earned or received by the applicant before taxes during the applicable tax year(s) or before any deductions; net receipts from non-farm or farm self-employment (receipts from a person's own business or from an owned or rented farm after deductions for business or farm expenses); income also includes regular payments from Social Security, railroad retirement, unemployment compensation, strike benefits from union funds, worker's compensation, veteran's payments, training stipends, alimony, military family allotments, private pensions, government employee pensions (including military retirement pay), regular insurance or annuity payments; dividends, interest, net rental income, net royalties, periodic receipts from estates or trusts, net gambling or lottery winnings.

### Income Exclusions

Capital gains; any assets drawn down as withdrawals from a bank; money from the sale of a property, house or car; one-time payments from a welfare agency to a family or person who is in temporary financial difficulty; tax refunds, gifts, loans or lump-sum inheritances; one-time insurance payments, or compensation for injury; non-cash benefits, such as the employer-paid or union-paid portion of health

insurance; employee fringe benefits, food or housing received in lieu of wages; the value of food and fuel produced and consumed on farms; the imputed value of rent from owner-occupied nonfarm or farm housing; depreciation for farm or business assets; federal noncash benefit programs as Medicare, Medicaid, food stamps, school lunches and housing assistance; combat zone pay to the military; child support; reverse mortgages; payment for care of foster children and college scholarships.

### **Proof of Eligibility**

Proof of income eligibility and associated documentation should be included in the client file. Each client file must contain an application from the client that contains the required demographics and income for the entire family living in the residence. The file must also contain evidence provided by the sub-grantee that the client is eligible to receive WAP services. Proof of eligibility can be determined by:

- **Outside Agency/Program:** If income eligibility is determined by an outside agency or program, i.e. Low-Income Home Energy Assistance Program (LIHEAP) or the U.S. Department of Housing and Urban Development (HUD), then copies of the eligibility documentation (can be a statement of LIHEAP eligibility or a copy of the HUD building list) are to be included in the client file.
- **Self-Certification:** After all avenues of documenting income eligibility are exhausted, self-certification is allowable, but evidence of the various attempts at proving eligibility must be contained in the client file, including a notarized statement signed by the applicant indicating that he or she has no other proof of income.

### **Child Support**

Child support payments from any state program or individual during an applicable tax year received or paid out are not considered sources of income for determining eligibility. When an applicant pays child support through a state program and/or to an individual, it cannot be deducted from the calculation for determining eligibility.

### **Annualization of Income**

Where an applicant receives income for a part of the applicable tax year, their partial income may be annualized to determine eligibility.

### **Example**

An applicant receives the following income: January (\$1,200), February (\$1,200) and March (\$1,200). The method of applying annualizing income to determine eligibility would be to multiply the total earnings for those months by four ( $3 \times 4 = 12$ ; 12 months/yr.). This would be the annualized income for the year:  $\$1,200 + \$1,200 + \$1,200 = \$3,600$ .  $\$3,600 \times 4 = \$14,400$ .

### **Limitations on Dwelling Eligibility**

A dwelling does not become eligible for additional weatherization if the occupancy of the dwelling unit changes to another low-income family, if a federal, state, or local program has designated the dwelling for acquisition or clearance within 12 months from the date of scheduled completion of the dwelling unit, or if the dwelling was previously weatherized with WAP funds, unless:

- The dwelling has been damaged by fire, flood, or natural disaster, and repair of the damage to weatherization materials is not covered by insurance.

- The original work was prior to September 30, 1994.

### **Limitation on Multi-Family Unit Eligibility**

*For information on limitations on eligibility of multifamily rental units, see current State Plan.*

### **Limitation on Single Family Rental Unit Eligibility**

In order to be weatherized, a single family rental unit must:

- Be occupied by an eligible household prior to the start of any weatherization activities.
- Have not been previously weatherized.
- Have written permission from the owner/landlord prior to the start of any weatherization activities, including the energy audit or initial assessment.

### **Recertification of Eligibility**

If there is reason to believe the eligibility of a household has changed since the Weatherization Services Application form was completed, re-certify the household. For households that have applied for weatherization services, work must be completed within one year of the date of application. If weatherization work is not completed within one year, the household must be re-certified.

### **Client Files and Records**

The applicant must provide the necessary evidence and income documentation to the intake worker to prove that the household meets the eligibility requirements. The documentation must be maintained in the client file and made available for inspection when being monitored. The following client eligibility documentation shall be included in the client file:

- The 12-month period that was considered
- A list of all sources of client income for each household member during the year prior to the certification month and for the period(s) being considered
- The date and initials of an agency employee verifying income

## SERVICE PROVISIONS

### Client Priorities

Once eligibility has been determined, the client priority policy must be followed. The 10 Code of Federal Regulation (CFR) 440.16(b) states that priority should be given to households that contain:

- Elderly (age 60 years and older) or disabled
- Children age 18 and under
- High residential energy users or those families with a high energy burden

### Owner Permission

Signed permission from the owner of each eligible dwelling unit must be obtained and documented in the client file prior to performing any inspections, tests, or weatherization measures on a dwelling.

### Required Activities for Weatherization

Georgia uses a priority list for both site built and manufactured homes based on measures specified by the approved priority list or the National Energy Audit (NEAT) or the Manufactured Housing Energy Audit (MHEA). There are three activities that must be completed on every weatherized home:

- Health and Safety Measures: To ensure the health and safety of the occupant(s) and the weatherization persons working in the home.
- General waste heat: To increase energy efficiency of the dwelling and to reduce the household energy burden.
- Client education: To provide the occupant(s) with the information and tools they need to protect the weatherization materials installed and to encourage clients to actively participate in saving energy.

Each home must follow the designated measures on the respective priority list unless a NEAT or MHEA is run on the home and followed accordingly. See the Georgia Weatherization Field Guides (Single Family Homes and Manufactured Housing) for further detail.

### Disallowed Expenditures

No weatherization grant funds shall be used:

- To weatherize a dwelling unit which is designated for acquisition or clearance by a federal, state, or local program within 12 months from the scheduled or completed weatherization date.
- To install or otherwise provide weatherization materials for a dwelling unit previously weatherized with grant funds under paragraph 440.18(a) of this section, except:
  - A dwelling unit has been damaged by fire, flood, or other natural disaster, and repair of this damage to weatherization materials is not paid for by insurance.
  - Dwelling units partially weatherized under this part or under other federal programs between September 30, 1975 and September 30, 1994 may receive further financial assistance for weatherization (re-weatherization).

### Allowable Weatherization Measures

The Weatherization Assistance Program (WAP) is designed to reduce energy consumption of dwellings by installing energy conservation measures based on their savings to investment ratio or cost-effectiveness.

Additional measures are approved and selected as incidental repairs necessary for the safe and effective installation of energy conservation measures. The methodologies used to accomplish these measures are based on the condition and design of the dwelling. These methodologies are further directed on individual dwelling units through blower door guided air-sealing and analysis and inspection of the heating system.

## **Weatherization Services**

1. **Energy Audit:** Each dwelling unit will receive a site specific energy audit following procedures established under the NEAT or MHEA or the approved Weatherization Priority List. Measures identified by the audit as having a positive savings-to-investment ratio ( $\geq 1.0$ ) will be considered to adequately weatherize the dwelling unit. The pre and post audits will include a blower door test and combustion safety testing to determine potential health and safety concerns unless it is not possible due to existing dwelling conditions. All findings are to be placed in the client file.
2. **Measure Selection:** Weatherization measures to be installed must be based upon the Single Family or Manufactured Housing Priority List or from the NEAT or MHEA.
3. **Client Education:** Material examples that can be included are video tapes, DVDs, CDs, coloring books, calendars, pamphlets, and other low cost/no cost items. Other components include:
  - Explaining the weatherization treatments and how to use and maintain them properly to maximize savings
  - Motivating client participation in conserving energy
  - Informing residents of other energy savings behaviors not directly related to the weatherization measures installed, e.g., thermostat setting/manual setback, energy efficient lighting, water conservation, etc.
4. **Incidental Repairs:** These are repairs necessary for the effective performance or preservation of weatherization materials. These costs are included in the average cost per house for weatherization efforts.
5. **Health and Safety Measures:** Weatherization should be provided in a manner that minimizes risk to workers and clients. Although the WAP cannot provide solutions to all health and safety issues, awareness of potential hazards is essential to providing quality services. Procedures to address potential health and safety issues include, but are not limited to, the following:
  - Each dwelling must be individually assessed to determine the existence of potential hazards to workers and clients.
  - Sub-grantees and their representatives should take reasonable precautions against performing work on dwellings that exposes the client to health and safety risks. In cases where work activities would constitute a health and safety hazard, action is required to limit or avoid particular risks. If a health and safety problem cannot be abated, the home should be deferred from weatherization services.
  - The agency staff must maintain awareness of potential immediate and long term hazards associated with the weatherization process. Specifications regarding the health and safety of

workers in the construction industry can be found in Construction Industry OSHA Safety and Health Standards (29 CFR 1926/1910), available from the US Department of Labor.

- Technical waivers will be allowed for non-performance of audit, installations, and/or inspections if, in the agency's best judgment, such action will expose workers to unsafe or unhealthy conditions.
- Health and Safety measures to be addressed either by the client prior to, or by the agency as part of the weatherization service will include:
  - Fire hazard
  - Carbon monoxide
  - Indoor air quality
  - Asbestos
  - Moisture problems/mold
  - Biological contaminant problems
  - Lead based paint
- Additional program requirements concerning Health and Safety are addressed in the Georgia Weatherization Assistance Program Health & Safety Plan and the Single Family and Manufactured Housing Field Guides.
- Costs will be those material and labor costs neither supported by energy savings of a weatherization measure(s) nor expended for incidental repairs.

**6. Final Inspection:** A sub-grantee representative will inspect the completed work and obtain a completion satisfaction verification signature from the client. This verification will become part of the permanent client file record. Also included is verification that the installed measures were explained to the occupant and that client education was provided. Quality Control Inspections must be performed by a certified Quality Control Inspector (QCI) who cannot be involved in the actual installation of weatherization measures. The GEFA Quality Control Inspection form must be filled in completely and be maintained in the client file. No dwelling unit may be reported to GEFA as completed until it has received a satisfactory Quality Control Inspection from a certified QCI person. In the event that a quality control inspection and/or client sign-off cannot be performed due to an uncooperative client, attempts to secure these documents must be thoroughly documented and maintained in the client file. A letter shall be sent indicating the client has 10 days to contact the sub-grantee. If there is no response within the 10 days, the job will be closed, and no further action will be taken on behalf of the client.

**Reporting a Completed Unit:** Sub-grantees are required to inspect 100% of completed units to determine compliance with the WAP including Georgia Weatherization Program Notices, DOE Weatherization Program Notices, the Georgia WAP State Plan, the Georgia WAP Health & Safety Plan, the DOE Contract, the DHS-HHS Contract, the Single Family Homes Field Guide and the Manufactured Housing Field Guide.

**8. Crew/Contractor Labor:** Weatherization services may be performed by in-house weatherization persons and/or contractors.

**9. Budgetary and Per-Unit Expenditure Limitations:** See funding source contract.



## ALLOWABLE EXPENDITURES

The Georgia Weatherization Assistance Program (WAP) sub-grantee agencies shall report Department of Energy (DOE) and Low Income Home Energy Assistance Program (LIHEAP) Department of Health and Human Services (HHS) funds for allowable costs listed below.

### **Allowable Expenditures**

“Allowable expenditures” shall mean the total of all expenditures qualifying as “allowable expenditures” in accordance with the terms and conditions of the DOE rules published at 10 Code of Federal Regulation (CFR) 440 and at 2 CFR 200 and with all other pertinent guidance from DOE and the Georgia Environmental Finance Authority (GEFA), including this manual. All expenditures must be properly documented as costs on eligible dwelling units in the sub-grantee’s books and records.

### **Administrative Costs**

“Administrative costs” shall mean those costs which a sub-grantee incurs that are not in direct support of individual WAP projects but are necessary to operate the WAP. Typical expenditures found in this category are wages and fringe benefits for executive, accounting, and administrative personnel working on the program. Other typical administration cost category expenditures are the payroll processing costs, health insurance program costs, data processing costs, indirect costs, and bank service fees. GEFA shall authorize payments for only these items listed below and in accordance with the approved budget and detailed narratives submitted by the sub-grantee agency.

### **Indirect Costs**

These payments are based on an indirect cost rate approved by a federal agency. The approved allocation plan shall be available to the state, on request.

### **Direct Costs**

Salaries and wages: These are payments of a fixed compensation for agency administrative, financial, and accounting personnel (see the salaries and wages section under program support for exceptions).

Space, utility, and telephone: These are payments made in accordance with approved budget for positions listed in direct salaries and wages.

Travel: These are payments for mileage, per diem, and subsistence for positions listed in direct salaries and wages. All travel and subsistence payments shall be made in accordance with the sub-grantee agency travel policy.

Copier, postage, and computer: These payments shall be made in accordance with appropriate cost allocation plan or approved indirect cost for positions listed above. Computer costs may include, but not limited to, on-line services, computer supplies, and maintenance agreements.

Audit costs: These costs are made in accordance and compliance with the provisions of the Office of Management and Budget (OMB) Circular A-133 and are allowable charges to DOE and other federal assistance programs. These charges may be considered a direct cost or an allocated indirect cost. The percentage of costs charged to federal assistance programs for a single audit shall not exceed the

percentage of federal funds expended to total funds expended by the sub-grantee during the fiscal year. Other costs: Other costs are those not included in the material or program support budget line items that are direct program costs.

### **Program Support Costs**

Allowable program support expenditures are directly attributable to program support personnel. GEFA shall authorize payments for only those items listed below and in accordance with the approved budget. Program support category costs exclude the labor category. Direct program costs include:

Transportation: All costs incurred for transporting materials, tools, equipment, and work crews to a storage site and weatherization work site shall be supported by a vehicle mileage log. Payment for all other travel and subsistence costs shall be made in accordance with sub-grantee travel policy. **NOTE**: The cost of transporting materials to a storage site and to the weatherization work site is also allowable under the weatherization materials category.

Maintenance and Repairs: Cost of tools and vehicles used.

Purchase of Tools: Sub-grantees must receive prior written approval from GEFA for tool purchases with a unit acquisition cost of \$5,000 or more which must include:

- Brief narrative and description of item
- List of similar equipment currently on hand and condition of each item
- Purpose and benefits for weatherization program
- Copies of invitations for bids and responses

Vehicles & Capital Equipment: All purchases or leases of vehicles require prior approval from GEFA and DOE which must include:

- Name of requesting local agency
- Where the equipment will be used and how it will be used—specify full or part time use
- A statement of whether this is a replacement vehicle. If this is a replacement, how is the trade-in being addressed?
- Brief description of how the procurement will be done and confirmation that agency, state and federal procurement guidelines will be met
- 2 CFR 225 (former OMB Circular A-87)—Cost Principles for State, Local, and Indian Tribal Governments
- 2 CFR 230 (former OMB Circular A-122)—Cost Principles for Non-Profit Organizations
- What the funding source(s) will be (e.g., DOE Weatherization Program Operations funds). Sub-grantee T&TA funds are not an allowable option.
- Copies of bid specs (vehicle description with options requested) and bids received
- Statement that lowest bid will be selected or a sufficient justification of the “best value selection” if lowest bid not recommended for DOE approval

Vehicle Insurance and Title Requirements: Any vehicle purchased or leased with weatherization funds shall carry at least the minimum amount of liability insurance as required by state statute and complete physical

damage coverage to protect vehicles aged five years or newer. **NOTE:** In the case a vehicle is leased, the leaser may have insurance requirements which exceed those required by state statute. Older vehicles may carry complete physical damage coverage at the discretion of the sub-grantee. All weatherization vehicles purchased with weatherization funds shall be titled to the weatherization sub-grantee agency. The state of Georgia WAP is to be shown as the first lien holder on all titles. Copies of the titles shall be sent to GEFA as soon as new titles are returned from the Department of Motor Vehicles.

Salaries and Wages: This item, including fringe benefits for program support staff, may be charged for the portion of time related to program support activities, except when the position is included in an indirect cost rate or cost allocation plan which identifies the position as administrative. **NOTE:** Inspectors, on-site supervisors, and clerical support related to program support activities are generally positions which perform program support functions. If any agency position is classified as an administrative position and is not a part of an indirect cost pool and performs program support activities, the time performing those activities may be charged as a direct cost to program support. Detailed time records shall be maintained and will be reviewed by monitors and auditors of the weatherization program.

Space, Utilities, and Telephone Supplies: Payments shall be made for the costs associated with approved program support positions. Costs are to be allocated in accordance with a cost allocation basis as identified in the appropriate OMB Circular A-133.

### **Labor**

GEFA shall authorize payments for only those items below and as approved in the sub-grantees' budget and detailed budget narrative:

- Payments to supplement wages paid to training participants
- Crew worker expenditures for installing materials
- Employment of on-site supervisory personnel installing materials
- Subcontract labor costs to install weatherization materials which are in accordance with all appropriate federal and state procurement and contracting rules and regulations

**NOTE:** Labor costs associated with the WAP, DOE, LIHEAP and utility funding, are not subject to Davis-Bacon prevailing wage requirements.

### **Liability Insurance**

GEFA shall authorize payments for costs incurred by sub-grantees for liability, points of impact, and workers compensation insurance for personal injury and property damage. GEFA requires sub-grantees to carry completed operations coverage.

### **Materials**

All weatherization materials must meet the latest standards as published in 10 CFR 440, revised Appendix A. Materials listed in 10 CFR 440, revised Appendix A, and identified as cost effective by the accepted

program energy audit. Weatherization agencies must keep current Material Safety Data Sheets (MSDS) for each material item purchased. Allowable material costs include:

- The cost of purchase and delivery of materials
- The cost of transportation to a storage site and to the site of the weatherization work
- The cost of storage of weatherization materials
- The cost of incidental repair materials
- Sub-grantees shall give preference in their purchases to products containing the highest level of recovered or recycled materials practicable.

### **Incidental Repairs**

Incidental repair costs may be included but not to exceed 10% of the total material cost of the unit. However, the 10% limit may be exceeded with an approved waiver from GEFA. DOE homes must maintain an overall Savings-to-Investment Ratio of one point zero (SIR 1.0) or higher. Repair materials are to protect or aid in the installation of weatherization materials and are part of the total allowable expenditure.

### **Health and Safety**

The cost of materials and labor to abate health and safety hazards (which are not required to be cost-justified) before, or because of, installation of weatherization materials or to comply with OSHA requirements are allowable charges as follows:

- Repair of combustible gas leaks inside a dwelling unit, including the installation of the appropriate type of gas line piping
- Repair of combustion appliance vent systems to ensure adequate draft, provide required clearances to combustible materials, and comply with applicable building codes
- Mitigation of indoor air quality problems that may be made worse by air sealing, especially those problems related to excessive humidity. This includes installing/providing additional combustion air and/or ventilation fans.
- Removal of an unvented primary heating source and installation of a replacement heat source, if necessary, by extending a heating duct from a forced air system or installing a vented space heater
- Installation of one smoke detector per sleeping area which does not have an operable, existing smoke detector as required by GEFA
- Installation of carbon monoxide alarm per in dwellings which do not have an operable, existing detectors as required by GEFA
- Smoke detector in a living space that is attached to a garage

### **Training and Technical Assistance (T&TA)**

T&TA costs are allowable for three types of activities:

- State staff monitoring/T&TA including salaries, travel, and other operating expenses
- Sub-grantee costs to attend approved T&TA activities
- Other contracted T&TA costs

## PROCUREMENT PRACTICES

### **Standards**

Sub-grantees are required to comply with federal standards in the purchase of supplies, expendable property, equipment, and services. The purpose of the standards is to ensure that all procurement is practical, open, and free competition and also that materials and services are obtained in the most economical and practical manner. These procurement standards must be in compliance with federal statutes and executive orders.

### **Required Georgia Environmental Finance Authority (GEFA) Validation**

At the beginning of each Department of Energy (DOE) weatherization program year, sub-grantees are required to engage in a solicitation for bid and submit to GEFA a detailed proposed bid for approval. Grant funds will not be reimbursed unless procurement pre-approval has been received by the sub-grantee.

### **Procurement/Bidding Requirements**

All procurement of goods and services with Weatherization funds will be made in accordance with 2 Code of Federal Regulations (CFR) 200.317-326 and Office of Management and Budget (OMB) Circular A-133 for non-profits. Procurement by states will follow the same policies and procedures it uses for procurements from its non-federal funds and OMB Circular A-102 and as directed by DOE. Contracts require specific clauses which are contained in Appendix II of 2 CFR Part 200. These regulations are available through [www.waptac.org](http://www.waptac.org). More stringent local purchasing policies may apply. Sub-grantees will establish and maintain written procurement procedures which reflect applicable state and local laws and regulations provided that the procurement conforms to the applicable federal regulations identified above and the standards identified in part D of this section. Sub-grantees will maintain a contract administration system that documents and evaluates contractors' performance in accordance with the terms, conditions, and specifications of their contracts or purchase orders.

### **Code of Conduct**

Sub-grantees will maintain a written code of conduct governing the performance of their employees engaged in the award and administration of contracts. No employee, officer, or agent of the sub-grantee shall participate in the selection, award, or administration of a contract supported by federal funds if there is a conflict of interest. Such a conflict would arise when the employee, officer, agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the above has a financial or other interest in the firm selected for award. The sub-grantee's officers, employees, or agents will neither solicit nor accept gratuities, favors, or anything of monetary value from contractors or potential contractors. To the extent permitted by state or local law or regulations, such standards of conduct will provide for penalties, sanctions, or other disciplinary actions for violations.

### **Materials Standards**

The minimum requirements are set forth in the DOE 10 CFR Part 440, Appendix A-Standards for Weatherization Materials. These standards are produced by the Consumer Products Safety Commission and are published in Title 16 of the CFR.

## **Procurement Standards**

Sub-grantees will make awards only to contractors who can perform successfully under the terms and conditions of a proposed procurement. Consideration will be determined by contractor integrity, compliance with public policy, record of past performance, and financial and technical resources. The sub-grantee will maintain records sufficient to detail the history of a procurement. These records will include, but are not limited to the following: rationale for the method of procurement, selection of contractor and contract type, justification for lack of competition when competitive bids or offers are not obtained, and basis for the contract price.

Awards shall be made to the bidder/offeree whose bid or offer is most advantageous to the sub-grantee, considering price, quality, and other factors. Solicitations shall clearly set forth all requirements the bidder or offerer must fulfill in order for the bid or offer to be evaluated by the sub-grantee. Any bids or offers may be rejected if it is in the sub-grantee's interest to do so.

All procurement transactions will be provide full and open competition. Full and open procurement procedures require that advertisements be placed in local newspapers or that documented telephone or written price quotes are obtained before purchase of goods or services is completed. Annual advertisement about the intent to purchase goods or procure services is acceptable; however, additional solicitation may be required if procurement is necessary outside the scope of any completed advertisements. When conducting a procurement transaction, agencies should be cautious of situations that may restrict free and open competition. Some of the situations considered to be restrictive of competition include, but are not limited to:

- Placing unreasonable requirements on firms for them to qualify to do business
  - Requiring unnecessary experience and excessive bonding
  - Noncompetitive pricing practices between firms or between affiliated companies
  - Noncompetitive awards to consultants that are on retainer contracts
  - Organizational conflicts of interest
  - Specifying only a "brand name" product instead of allowing "an equal" product to be offered and describing the performance of other relevant requirements of the procurement
- Any arbitrary action in the procurement process

Sub-grantees will have written procedures for all procurement transactions. These procedures shall ensure that all solicitations incorporate a clear and accurate description of the technical requirements for the material, product, or service. Such description shall not, in competitive procurements, contain features which unduly restrict competition. Detailed product specifications should be avoided if at all possible. When it is impractical or uneconomical to make a clear and accurate description of the technical requirements, a "brand name or equal" description may be used as a means to define the performance or other salient requirements of a procurement.

Some form of cost analysis, evaluation of each element of cost to determine reasonableness and allowableness, shall be made and documented in the procurement files in connection with every procurement action. Price analysis may be accomplished in various ways such as the comparison of price quotations submitted.

Contracts in excess of the small purchase threshold (over \$5,000) shall contain contractual conditions that allow for administrative, contractual, or legal remedies if a contractor violates the contract terms and provide for remedial actions as may be appropriate.

### **Types of Procurement**

Procurement by small purchase procedures: Small purchase procedures are relatively simple and informal procurement methods for securing services, supplies, or other property that do not cost more than \$5,000 over the term of the contract. If small purchase procedures are used, price or rate quotations shall be obtained and documented from an adequate number of qualified sources. At a minimum, documentation must include the name of the bidder/offerer, description of product or services, date of solicitation, quantity, and per unit and aggregate cost. Procurement of equipment in excess of \$5,000 must have the prior approval.

Procurement by sealed bids (formal advertising) for goods or services over \$25,000: Bids are publicly solicited, and a firm fixed-price contract (lump sum or unit price is awarded to the bidder whose bid follows all material terms and conditions and is the lowest price. In order for sealed bidding to be feasible, the following conditions should be present:

- A complete, adequate, and realistic specification or purchase description is available.
- Two or more responsible bidders are willing and able to compete for the business.
- The procurement lends itself to a firm fixed-price contract and the selection of the successful bidder can be made principally on the basis of price.

If sealed bids are used, the following requirements apply:

- The invitation for bids will be publicly advertised, and bids shall be solicited from an adequate number of known suppliers, providing them sufficient time for response prior to the date set for opening the bids.
- The invitation for bids, which will include any specifications and pertinent attachments, shall define all items or services.
- All bids will be publicly opened at the time and place prescribed in the invitation for bids.
- A firm fixed-price contract award will be made in writing to the lowest, responsible bidder. Factors such as discounts, transportation cost, and life cycle costs shall be considered in determining which bid is lowest. Payment discounts will only be used to determine the low bid when prior experience indicates that such discounts are usually taken advantage of.
- Any or all bids may be rejected if there is a sound documented reason.

Procurement by competitive proposals: The technique of competitive proposals is normally conducted with more than one source submitting an offer, and either a fixed-price or cost- reimbursement type contract is awarded. It is generally used when conditions are not appropriate for the use of sealed bids. If this method is used, the following requirements apply:

- Requests for proposals will be publicized and identify all evaluation factors and their relative importance. Any response to publicized requests for proposals shall be honored to the maximum extent practical.
- Proposals will be solicited from an adequate number of qualified sources.
- Sub-grantees will have a method for conducting technical evaluations of the proposals received and for selecting awardees.
- Awards will be made to the responsible firm(s) whose proposal is most advantageous to the program, with price and other factors considered.

Procurement by noncompetitive proposals: Procurement through solicitation of a proposal from only one source, or after solicitation of a number of sources, is determined to be inadequate. Procurement by noncompetitive proposals may be used only when the award of a contract is infeasible under small purchase procedures, sealed bids, or competitive proposals and one of the following circumstances applies:

- The item is available only from a single source.
- The public exigency or emergency for the requirement will not permit a delay resulting from competitive solicitation.
- The awarding sub-grantee authorizes noncompetitive proposals.
- After solicitation of a number of sources, competition is determined inadequate.
- Cost analysis is required.

The type of procurement used shall be determined by the sub-grantee but shall be appropriate for the particular procurement and for promoting the best interest of the program or project involved. (The “cost plus percentage of cost” or “percentage of construction cost” methods of contracting shall not be used.)

### **Subcontracting Procedures**

Subcontracting for weatherization and/or heating system services is subject to all appropriate procurement policies provided in 2 CFR 200. Since procurement by sealed bids (formal advertising) may not be appropriate due to the need to procure these services on an on-going and timely basis and when more than one qualified contractor is necessary to meet the production needs of the sub-grantee, procurement through competitive proposals is also an allowable means to secure these services. Subcontract agreements must clearly state appropriate program policy, federal and state regulations, and the rights and obligations of each party.

After determining what items or services are to be subcontracted, the sub-grantee must develop a list of specifications for the items/services to be procured along with some form of cost analysis using historical data, commercial pricing, and sales information sufficient to enable the sub-grantee to verify the reasonableness of the price.

A Request for Proposal (RFP) must be developed to include the scope of work, job specifications with an itemized price list, necessary contractor requirements and qualifications, and sub-grantee expectations.



Women business enterprises, small businesses, and minority-owned firms are encouraged to apply. Notice of the RFP's availability should be placed in all appropriate newspapers and also be provided directly to companies that sub-grantees have researched and feel have the qualifications to meet the needs of the program. The sub-grantee must develop written rating standards to certify a contractor as eligible to participate in the program. This rating system must provide for a consistent and objective evaluation of the potential contractors.

Upon review and determination of eligibility, written notification should be sent to all bidding contractors indicating their acceptance or rejection to the RFP. The number of contractor(s) determined eligible shall be based on their overall rating. In addition, the sub-grantee's production needs and adequate coverage for the service area should be considered when selecting the number of eligible contractors. The sub-grantee may, at their discretion and depending on the reason for rejection, afford the contractor opportunity to revise their proposal to meet the requirements of the RFP. A notice of rejection should include a protest/appeal procedure with a cutoff date for those contractors not meeting the eligibility criteria. Notice of acceptance to qualifying contractors should indicate a date and time of an initial subcontractors meeting which should include, but is not necessarily limited to, review of:

- Program description
- Anticipated production
- Content and requirements of the subcontract agreement
- Obligations of the sub-grantee and the subcontractor
- Scope of work/job specifications and technical requirements of the program
- Scheduling of work, issuance of work orders, provisions for issuing and documenting change orders
- Clearance testing, quality inspection, callback procedures, and final signoff
- Invoicing and payment procedures

At this time, or at a subsequent meeting, the price lists submitted by contractors for the items identified in the RFP will be reviewed and compared to the sub-grantee's cost analysis. The list will be negotiated as necessary to arrive at a fixed price for services to be provided to the subcontractors. Once contractors have agreed to the terms and conditions set forth by the sub-grantee, a subcontract agreement may be executed. They should also be provided with any additional procedural or technical information and any required forms which are necessary to fulfill the terms of the contract, including a copy of the *Georgia Weatherization Procedures Manual* and the *Georgia Weatherization Field Guide*.

If, after a sub-grantee has fulfilled all the requirements of a competitive bid process, either through sealed bids (formal advertising) or competitive proposal/negotiation, and there is insufficient competition (i.e. no or only one bidder), the sub-grantee may secure services through noncompetitive procurement. In this case, it is required that a cost analysis be conducted to determine the reasonableness of compensation requested by a contractor. Noncompetitive procurement, other than small purchases (less than \$5,000 over the life of the contract), must have prior approval of GEFA.

## **Inventory Control Forms**

Property and Equipment Inventory: Send copy to GEFA by the 10th day of each month. Record all property, equipment, and tools with an acquisition cost over \$300.

Material Inventory Report: Send copy to GEFA at the end of contract, annually. Material inventory will provide an audit trail from purchase to installation as well as material on hand.

Daily Material Sign-out Sheet: Document removals from storage/warehouse, usage on jobs, and returns on a daily basis. A physical count of equipment and materials is to be performed on a regular basis, no less than quarterly. Discrepancies between the recorded and actual amounts must be documented, reconciled, and signed off by the supervisor.

## STATISTICAL REPORTING AND PAYMENT REQUESTS

The sub-grantee's production activity and expenditure report submittal to the Georgia Environmental Finance Authority (GEFA) is the basis for determining the amount of reimbursement paid to the sub-grantee. The monthly invoice should be submitted to the state via the Hancock Energy System (HES) by the 10<sup>th</sup> day of each month. The HES User's Guide describes the process that must be followed to enter an invoice and assign jobs and the period end date for the units being presented for certification. Repeated failure to invoice GEFA by the 10<sup>th</sup> day of each month could result in the reduction of funding. Please refer to chapter eight of this manual for further details on the invoicing process.

### **Electronic Payments**

The Georgia Environmental Finance Authority (GEFA) requires each sub-grantee to take the necessary steps to receive payment directly by automated clearing house (ACH) transfer. GEFA has issued guidelines for electronic payments. As part of the guidelines, only one bank account may be designated for receipt of funds. Copies of the guidelines may be obtained from the assigned GEFA fiscal representative.

### **Monthly Payment Requests**

A payment request must be submitted on a monthly basis. If an invoice is not submitted within 60 days of the previous month's due date, a letter may be sent to the sub-grantee executive director informing that all future reports will require a fiscal review by GEFA until the sub-grantee can comply with all reporting requirements, or else payment may be suspended. Follow the instructions for the submission of the monthly report section of the HES User's Guide.

## REIMBURSEMENTS

When the request for payment is received by the Georgia Environmental Finance Authority (GEFA), it will be reviewed for completeness, accuracy, desk audited against the terms of the contract, and adjusted, based on the field visit findings of the GEFA monitor or fiscal representative. In addition, the sub-grantee's production will be evaluated against its production schedule, and the level of payment may be adjusted accordingly. Please refer to the allowable expenditures section of this chapter for a description of expenditures chargeable to this contract.

### **Payment Adjustments**

GEFA reserves the right to make payment adjustments in accordance with Appendix C of the weatherization contract.

### **Withholding Payment**

GEFA reserves the right to withhold payments in accordance with the weatherization contract.

### **Cash Balance Review**

GEFA reserves the right to periodically review contractor's actual cash balance of funds received pursuant to this manual, to evaluate such cash balances in accordance with 2 Code of Federal Regulations (CFR) 200., and to take such remedial action as reasonably necessary, which may include reducing payments due.

### **Disallowed Program Income Expenditures**

Program income expended in any manner which is inconsistent with the policies and procedures shall be disallowed. GEFA reserves the right to deduct any disallowed program income expended from any payments.

### **Non-Reimbursement**

GEFA shall not reimburse for any claimed expenditures for third party claims against the contractor and/or any of its subcontractors, suppliers, their agents or employees, or for any claims by subcontractors or suppliers against GEFA for labor, materials, or equipment furnished to the contractor. GEFA shall not reimburse for any claimed expenditures based on a misrepresentation of material fact including, without limitation, work not in fact performed or materials not in fact supplied or incorporated in the work. Such misrepresentation is an event of breach in the contract between GEFA and the sub-grantee. GEFA shall also not reimburse for any claimed expenditures for work performed in less than a workmanlike manner, for materials installed which do not conform with the materials specifications set forth in 10 CFR 440, Appendix A, or otherwise defective or substandard work that is not replaced or repaired within a reasonable period of time after receiving a written notice from GEFA.

## MULTI-UNIT/MULTI-FAMILY BUILDING ELIGIBILITY REQUIREMENTS

In the weatherization of multi-unit/multi-family buildings, Department of Energy (DOE) regulations require that 66% (50% for duplexes and four unit buildings) of dwelling units in the building must be eligible or will become eligible within 180 days as referenced in 10 CFR 440.22(b). Within the constraints of the program, a sub-grantee shall provide services to rental dwelling units occupied by eligible program participants or units that are expected to be occupied by eligible program participants within 180 days of completion of the weatherization work. A sub-grantee shall weatherize the entire multi-family building when the building is eligible. A National Energy Audit Tool (NEAT) is required for these projects to cost justify all measures. Preapproval from the Georgia Environmental Finance Authority (GEFA) is required for all projects requiring the NEAT audit in Georgia.

### Procedure

1. Sub-grantees shall use the financial assistance guidelines for dwelling units to determine eligibility.
2. Rental buildings should be treated the same as owner-occupied buildings in determining appropriate measures to be performed.
3. Multi-family buildings which include duplexes and buildings with three or more dwelling units are eligible to receive weatherization services in Georgia. The NEAT audit must be utilized. A priority list does not exist for multi-unit buildings.
4. Sub-grantees shall obtain a signed agreement (Landlord Rental Agreement) from the owner/landlord of the building or his designated agent authorizing the work to be done and agreeing to the landlord's financial participation in weatherization costs. Sub-grantees should develop a detailed description of the weatherization measures authorized and costs assigned to the landlord and the agency. Rent shall not be raised because of the increased value of dwelling units due solely to weatherization assistance. The agreement shall include a provision that the landlord agrees not to raise the rent for at least two years from the time the work is completed, unless raising the rent is based on factors unrelated to the weatherization improvements. The client shall be provided a copy of the signed agreement.
5. In order to weatherize an entire multi-family building, the building must have at least 66 percent program eligibility rate (50 percent duplex or four-plex) including those units that will become eligible within 180 days under a federal, state, or local government program for making improvements to the building. If the entire building is not eligible for weatherization because there are not enough units occupied by eligible families, service to the entire building shall be denied.
6. The maximum amount of grant funds that can be spent for weatherization for the entire building is determined by the number of units within that building occupied by eligible families/tenants, multiplied by the average cost per home. For reporting purposes, all units receiving weatherization may be reported as "completed units."
7. Approved measures (10 CFR 440, Revised Appendix A) that are applicable to multi-family units should be assessed, prioritized, and implemented in an energy savings/cost effective manner appropriate to the particular building.
8. Because the Weatherization Assistance Program (WAP) operates on the holistic building-as-a-system model, only whole-building weatherization is allowed; separate weatherization of individual units is not permitted by DOE. If each dwelling unit in a multi-family building is separately owned and occupied by the owner, and the building meets the income eligibility threshold stated above, then the entire building and all units and common areas within the building will be weatherized as

determined by the energy audit. All units in the building, income-eligible and non-income-eligible, will be reported to DOE as completed units.

9. If a building contains one or more dwelling units and is also used for commercial purposes, only the part of the building occupied by an eligible household may be received. Sub-grantees may not weatherize commercial property. As described in 10 CFR 440.22, an eligible multi-family dwelling unit applies to rental units containing commercial property. The commercial property cannot be counted as a unit when determining the number of units in the building. The sub-grantee shall charge the portion of the eligible unit to the program and charge the portion of the commercial area to the property owner depending where a measure will need to be installed. The amount charged to the property owner may not be counted toward the owner contribution if an owner contribution is required under 10 CFR 440.22(d). If the property owner declines the measure or declines to pay the portion associated with the commercial area, the dwelling unit must be denied.
10. No undue or excessive enhancements shall accrue to the value of weatherized dwelling units. Weatherization measures to be completed on rental units, as on owner units, must be cost-effective, as determined by approved unit profiles or by an individualized NEAT audit. The state may recoup costs of excessive weatherization measures.
11. The benefits of weatherization services shall accrue primarily to the low-income tenants.
12. Sub-grantees must receive written permission from the owner (or authorized representative) to weatherize the building. Sub-grantees are required to use the WAP Rental Work Agreement for each rental weatherization project. This agreement is used on single family, duplexes, 4 units, and multi-family rental units. The document can be found on GEFA's website [www.gefa.org](http://www.gefa.org).
13. Agencies working on 1-4 unit rentals must follow these steps prior to performing weatherization work:
  - a. Tenants are notified that rent cannot be increased per item (10) above.
  - b. Tenants are informed of owner contributions in the form of rebates and rent reductions, when required.
  - c. Tenants are notified in writing of the formal complaint process.
14. Execute the Property Owner Agreement. In rental dwelling units where owners are responsible for paying heating costs or multi-family units that are master-metered, owners may be required to make a contribution up to 15 percent of the total cost of the weatherization work. If heating/cooling system replacements are involved, the landlord must contribute 25 percent of that cost. When the tenant is responsible for paying heating costs, the owners are required to make a contribution up to 10 percent of the total cost of the weatherization work.
15. An exception is made for owners who are themselves eligible for weatherization services. These owners are not required to make contributions. The owner may meet the owner contribution requirement in any of the following ways:
  - a. Cash contribution
  - b. Rebate or rent reduction (the rebate period cannot exceed two years)
  - c. Weatherization materials donated

### **Multi-family Housing Weatherization Plan and Permission**

A sub-grantee shall submit a multi-family housing weatherization project plan and gain permission from GEFA before weatherization of any multi-family dwelling units and must comply with the approved plan thereafter. Sub-grantees must use the Multi-Family Preliminary Application Form provided by GEFA and all required information must be completed. Sub-grantees are advised to follow these steps when submitting paperwork to GEFA for approval:

1. Tenant Issues
  - Cover letter with how tenants will be notified of the WAP and the Health and Safety requirements (i.e., lead and mold information)
  - Evidence that the owner understands they will not raise rent(s) for a period of two years because of the increased value of the dwelling unit(s) when the value is increased solely because of the weatherization work
  - Notification to affected households that rent cannot be increased per item (4) above
  - Notification to tenants of owner contributions in the form of rebates and rent reductions
  - Notification to tenants in writing of formal complaint process
2. Property Documents
  - Preliminary application
  - Detailed scope of work highlighting the proposed weatherization measures and any energy problem areas
  - Matching funds – description if owner is using other programs for other repair and/or renovations (i.e., low-income housing tax credits, etc.)
  - Letter of commitment from owner outlining their contribution
  - Project schedule
  - Net energy savings/benefit potential

GEFA will review the above documents for accuracy and approval/disapproval. Upon approval for the preliminary phase, the sub-grantee can move forward with the final application and landlord agreement.

### **Final Application**

Sub-grantee submits all supplement/final applications and landlord agreement to GEFA along with a final project budget and scope. Upon review, GEFA will submit the entire package to DOE for approval. Upon DOE approval, GEFA will issue an approval/disapproval letter. Work cannot start on a multi-family project unless a sub-grantee has received the final approval letter from GEFA.

### **Multi-Family/Rental Weatherization Complaint Procedures**

1. Tenant or property owner should contact sub-grantee to log a complaint.
2. Sub-grantee will instruct tenant or property owner to complete a formal written complaint.
3. Tenant or property owner submit a written rebuttal.
4. Sub-grantee will determine if the complaint is legitimate. If the complaint is legitimate (violates agreement), sub-grantee will write a letter to the property owner or tenant giving them a 30-day notification to remedy the problem and submit documented proof or face penalties and/or legal action.
5. If not remedied locally, escalate to GEFA WAP with all written documentation. The written request for investigation should be sent to: Weatherization Assistance Program, Division of Energy Resources, 233 Peachtree St NE, Suite 900, Atlanta, GA 30303
6. GEFA will write letter to property owner or tenant with a 30-day remedy period. GEFA to copy all other funding agencies involved in the property.
7. If no remedy, refer to Georgia Department of Law.

### **Multifamily Housing – US Department of Housing and Urban Development (HUD) Lists**

Beginning in the calendar year 2017, the U.S. Department of Housing and Urban Development (HUD) will no longer be updating the lists on buildings that meet certain income eligibility requirements. Therefore, WAP will no longer use them (WAP regulations at 10 CFR 440.22(b)(4)(iii)). At that point, HUD will qualify multi-family buildings on a case-by-case basis, as requested. Grantees wishing to qualify a building should make the request through their respective DOE Project Officer. Income eligibility can be made on an individual basis by the local WAP service provider based on information supplied by property owners and the families. The rule indicates that income qualified public housing, assisted housing, and LIHTC properties may be eligible recipients of WAP funds even if they are not on the list(s). The rule does not, however, require grantees or local WAP service providers to set aside WAP funds for these properties. The grantee and/or the local service provider retain the authority to set priorities for the use of WAP funds in their service areas. Funding for individual projects remains a function of grantee or local program priorities and funding availability.



## DEFERRAL/DENIAL OF ASSISTANCE – WHEN NOT TO WEATHERIZE

### Deferral Policy

The Georgia Weatherization Assistance Program (WAP) may elect to defer a home from receiving weatherization services where health and safety hazards exist for WAP staff, contractors, and clients that prevent the safe and effective implementation of weatherization measures. The decision to defer work in a dwelling, or in extreme cases, provide no weatherization services, is difficult but necessary in some cases. This does not mean that assistance will never be available but that work must be postponed until the problem can be resolved. Information for making this determination may become evident during the eligibility process, during the audit, or after work has started.

### Causes for Deferral

Conditions which may cause a home to be deferred include, but are not limited to the following:

- Weatherization of home after September 30, 1994 (this pertains to the use of the Department of Energy (DOE) and non-DOE funds)
- Structurally unsound dwellings
- Vacant dwelling (Exception: multifamily units using DOE funds and the 50% or 66% client eligibility rule)
- Standing water, mold, or other moisture issues that cannot be addressed with weatherization funding
- Evidence of substantial and persistent infestations of rodents, insects, and other vermin
- Electrical or plumbing hazards that cannot be resolved prior to or as a part of weatherization services
- Improperly stored chemicals, combustible materials, or other fire hazards
- The presence of sewage in any part of the dwelling unit, basement, or crawl space
- Environmental hazards such as serious moisture problems, carbon monoxide, gas leaks, friable asbestos, or other hazardous materials
- Deteriorated lead based paint surfaces that could lead to other health hazards
- The presence of animal feces in any area of the dwelling unit where program staff must perform weatherization measures
- Excessive clutter in and around the dwelling unit which limits the program staff's access to the dwelling and encourages pest infestations
- Maintenance and housekeeping practices that are negligent to the point of limiting the access of program staff to the dwelling or creating an unsafe working environment
- An overt threat of violence to any program staff member or any household member during the weatherization process
- Unsecured pets
- The presence and/or use of any controlled substance in the dwelling unit during the weatherization process
- Major remodeling in progress which limits the proper completion of weatherization measures
- Home listed for sale
- Uncooperative client—client refuses major weatherization measure or refuses to make modifications necessary to permit completion of required measures

It is the homeowner's responsibility to correct the above conditions(s) for weatherization services to proceed. When the conditions causing the deferral have been addressed, homeowners are to contact the weatherization sub-grantee to reevaluate the home. When possible, weatherization sub-grantees are encouraged to make referrals or collaborate with programs including utility sponsored weatherization, Healthy Homes program, home repair programs, and other local resources to best serve the customer.

## **Deferral Procedures and Contractor Payment**

### Deferrals during audit

If an auditor arrives at a home, begins to review the home, and determines it should be deferred prior to concluding the audit, the auditor shall immediately contact the sub-grantee Weatherization Director to describe the situation and ask for guidance. If the auditor feels the house should be deferred for a problem likely to be fixed and/or easily fixed—and that the home will eventually be weatherized—the audit may continue; however, the auditor shall immediately contact the sub-grantee Weatherization Director to describe the situation and ask for guidance. If possible, the Weatherization Director (or his/her assignee) may want to meet the auditor in the field to discuss the situation further and brainstorm ideas to allow the audit to continue and avoid deferral. No home may be deferred without approval from the sub-grantee Weatherization Director. If possible, all areas of the home should be inspected to identify all deferral issues in order to avoid multiple deferrals. Photos of all deferral conditions should be taken and included in the client file. If the home must be deferred, the auditor shall have the homeowner sign a deferral form that includes the reasons for deferral. If deferral occurs before the audit is completed, the unit is eligible for payment as an audit cut short for a deferral reason. If the cause of the deferral is resolved, the sub-grantee shall assign the same auditor to the unit to conclude the audit. If a home is deferred after the audit is completed, payment may not be made unless and until the "Administrative procedures to be followed for deferred units" below is concluded.

### Deferral at time of measure installation

Any crew or contractor who arrives on site and discovers a cause for deferral shall immediately contact the Weatherization Director to discuss the situation and determine a course of action. No work shall be done on the home. If the unit is deferred, the contractor shall fill out a deferral form on site listing the reasons for deferral and obtain the client's signature before departing the home. The contractor shall then be entitled to payment for work completed prior to the deferral.

### Administrative procedures to be followed for deferred units

Once a unit has been deferred, the sub-grantee shall make every effort to bring homeowners back into the program. The sub-grantee shall:

1. Direct a letter to the homeowner informing them the home has been deferred and asking them to correct the deferral conditions and contact the agency when the work is complete. The agency should give the client 15 days or a reasonable amount of time to correct the issues. The letter should refer the client to any resources that may assist with the deferral conditions.
2. If no action is taken by the homeowner, a second letter will be sent to the client by certified mail, informing them that they must contact the sub-grantee within 10 days to be eligible for weatherization.
3. If no response is received to the certified letter, the unit is removed from further consideration by the WAP.

4. If at any time the homeowner states that they cannot or will not make the needed repairs, a final letter shall be sent to the homeowner informing them that they have been removed from the program and that they may not participate in WAP in the future.
5. All letters and documentation of efforts to contact or help the homeowner shall be kept in the clients file by the sub-grantee.
6. Removal from the program will track with the unit owner at the time of initial WAP visit. Should the owner re-apply or purchase or otherwise occupy another dwelling and wish to receive weatherization services, they shall be placed on the waiting list.

### **Notification and Appeal**

Households shall be informed in writing by the sub-grantee when services are denied or withdrawn based on the deferral guidelines above. The denial notice will include instructions for appeal based on the "Complaints & Dispute Resolution" detailed in Chapter 4 of the Weatherization Procedures Manual.

If obvious discrepancies are found between the information supplied by the client on the application and observed conditions at the time of weatherization, the sub-grantee must resolve these questions prior to weatherization. Some examples of discrepancies are an obvious change in the client's income, e.g., an unemployed client who is now back to work, a difference in the number of persons living in the dwelling unit, (fewer persons than listed, a person or persons not accounted for who may have income), evidence of business being conducted in the unit, etc.

In unusual situations not covered above or where other problems of a unique nature exist, the Georgia Environmental Finance Authority (GEFA) should be consulted.

## REWEATHERIZATION

Georgia has adopted the reweatherization date of September 30, 1994. All dwelling units completed prior to September 30, 1994 must be addressed using the Department of Energy (DOE) approved priority list, or have a DOE approved energy audit (such as National Energy Audit Tool (NEAT) and Manufactured Home Energy Audit (MHEA)) to justify the cost of the measures being installed.

However, there may be a need for reweatherization under certain special circumstances. Units that were originally weatherized prior to September 30, 1994 or units damaged by fire, flood, or an act of God and require additional weatherization services may be reweatherized at the discretion of the sub-grantee and is subject to prior approval by the Georgia Environmental Finance Authority (GEFA). Reweatherization requires a new application, including all documentation requirements (e.g., income/categorical eligibility, energy audit, energy information, Owner's Agreement, etc.). In all cases, reweatherization is subject to prior approval by the GEFA.

When a previously weatherized unit is damaged by fire, flood, or an act of God, (e.g., tornado, earthquake, lightning, or other natural disaster), the unit may be reweatherized if the owner has no insurance to cover the damage. An Affidavit of Damage must be completed, listing the date and type of occurrence that caused the damage, including the owner's signature attesting to the lack of insurance. This form must be included in the job file for the unit. Only those materials and labor costs considered allowable under Weatherization Assistance Program (WAP) guidelines will be allowed.

Previously weatherized units may receive additional services subsequent to completion of the weatherization if those other services are considered part of a coordinated activity project, and there is no additional cost to the WAP contract.

## LEAD-SAFE WEATHERIZATION

In WPN 09-6, issued January 2009, WPN 08-6, issued in September 2008, and in earlier guidance, the Department of Energy (DOE) requires that all Weatherization Assistance Program (WAP) funded work be conducted in a lead-safe manner. The U.S. Environmental Protection Agency (EPA) published the Lead Renovation, Repair and Painting Program final rule in 2008. To ensure compliance with this rule, all sub-grantees should receive training in lead-safe weatherization (LSW) practices. The Georgia Environmental Finance Authority (GEFA) requires sub-grantees to attend Lead Renovation, Repair and Painting training to ensure that crews and subcontractors are knowledgeable in current requirements. The rule also requires that each sub-grantee is certified by EPA as a Certified Renovation firm. Therefore, Certified Renovators must be onboard with sub-grantee crews or contractors and performing all the EPA required functions on all pre-1978 housing that has not been determined as exempt by state-approved protocols. The rule also has provisions on worker protections, client notification, client health and safety, and documentation of lead-safe work. The following requirements apply.

### Lead Paint Hazard Control Procedures

DOE requires that all work performed on homes built before 1978 be completed using LSW practices unless the building is exempt, pursuant to DOE notice WPN 09-6. Sub-grantees must adopt basic safety precautions and must follow the specified EPA requirements with regard to worker protection. GEFA requires sub-grantees to follow the specified EPA and OSHA standards for worker safety as well as all state and local requirements.

GEFA requires all sub-grantees and their subcontractors to carry pollution occurrence insurance (POI). If the sub-grantee or subcontractor does not have POI, they must defer all work that may bring them in contact with lead paint or dust until they have secured the proper insurance. **Note: Certificates of insurance must be submitted to GEFA for approval prior to commencing any work that may bring sub-grantees or subcontractors in contact with lead paint or dust.** The certificates must identify GEFA as certificate holder and additional insured parties and must contain a provision that coverage afforded under the policies will not be cancelled or that GEFA's interest will not be otherwise affected unless at least 30-day prior notice has been given to GEFA.

To ensure client health and safety, sub-grantees must ensure that residents and pets do not have access to the work area. Sub-grantee staff and subcontractors must make every effort to contain the work area and eliminate tracking any dust or materials throughout the house (or exposing residents and pets to any contaminants). If containment cannot be achieved, and there is risk of traffic through the work area (e.g., work will take several days involving kitchens, bathrooms, or bedrooms), agencies are advised to defer the work until other resources can be secured to offset relocation expense for the residents and pets (see section on deferral, below).

GEFA policy requires owners to address lead hazards in a unit that are not related to the weatherization work. The policy advises that when there are lead paint hazards in the premises, and the weatherization work would pose a threat to the residents and the workers, the sub-grantee must defer the weatherization work until the problem has been corrected so the weatherization work can be safely performed. The agreement between the owner and the sub-grantee requires the owner to remediate any lead-based paint hazard in the premises. The sub-grantee must not start the weatherization work until the owner has completed his/her portion of the work.

## **Client Notification**

GEFA requires sub-grantees to follow the EPA requirements related to notification. Owners and occupants of a dwelling built before 1978 must receive the EPA's new publication *Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools* must be used. The following link is the link for the publication. <http://www.epa.gov/lead/pubs/renovaterightbrochure.pdf>

## **When to Defer Work due to Lead Hazards**

Compliance with LSW requirements may mean that some weatherization work must be deferred until the sub-grantee can ensure that no lead paint hazards will be created by the work or until another agency has corrected the problem so that weatherization work can be safely performed. Weatherization work should not be deferred solely because there is lead based paint in the home. The sub-grantee must follow LSW practices in all units that are not specifically exempted to ensure that hazards in a unit do not pose a threat to the residents or the workers. In determining whether or not to defer weatherization work, the sub-grantee should consider the following:

- Is the sub-grantee adequately prepared to work with lead-based paint? (i.e., have workers received training in lead safe work practices; does the sub-grantee have the necessary personal protective equipment such as protective suits and respirators; and does the sub-grantee have the necessary equipment and materials to follow lead safe work practices such as a HEPA vacuum and plastic)
- What is the condition of the painted surfaces inside and outside of the house? (i.e., are they seriously deteriorated such that a workman's just walking around the house, drilling holes in sidewalls, installing weather stripping, etc. could be enough to stir up lead-based paint dust residues and thus pose a threat to the clients and to the workers themselves)
- What is the extent to which the specific energy efficiency measures determined by the energy audit will disturb painted surfaces? (i.e., will the disturbance generate dust in excess of the OSHA minimums)
- Will the cost of doing LSW represent a disproportionately large portion of the total unit cost?

Based on these factors, the sub-grantee should determine whether to:

1. Proceed with lead-safe weatherization work.
2. Do some weatherization measures and defer others measures.
3. Defer all of the weatherization work until work can be performed by trained personnel who can follow LSW practices or defer all work until another agency has corrected the problem such that weatherization can be safely performed.

## **Lead-Safe Weatherization Practices**

All sub-grantees shall use the following LSW practices whenever known or presumed lead-based paint is disturbed.

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 the 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.
- 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
  - 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 before disturbing it. Try to keep it wet and use wet sanding/scraping methods whenever disturbing the paint.
- H. If equipment is going to be reused, wash it thoroughly.
- I. Dispose of all lead-based paint, debris, coveralls, and plastic covering in regular trash.
- J. Dispose of all water contaminated with lead-based paint in a sanitary sewer system.

Minor paint disturbances: When less than two 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 the general requirements described above.
- B. Tape a plastic bag or sheeting on the horizontal surface below the paint to collect paint chip sand any dust that may be formed.
- C. After work is done, wipe the surface with a baby wipe or towel.

Exterior Paint Disturbances: When more than 20 square feet of exterior lead-based paint is disturbed. Generally, removing siding from a wall is presumed to disturb more than 20 square feet of lead-based paint unless it is known before-hand that deteriorated lead-based paint and lead dust is not behind the siding:

- A. Follow the general requirements described 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, door, dryer exhaust, 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 on wall below the paint to be disturbed and on the eight feet from the wall so 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 remain.

## MOLD AND MILDEW

Over the past few years, health professionals and building scientists have become increasingly concerned with the presence of mold and mold-like conditions in and around the home and the health effects on building occupants. The Weatherization Assistance Program (WAP) has paid close attention to the role of moisture and ventilation as variables affecting the quality of the living environment. Although weatherization funds cannot be spent to mitigate mold, sub-grantees must be aware of the conditions in and around the dwelling unit that can cause or worsen mold and mold-like conditions.

When performing the initial walkthrough and energy audit of the dwelling unit, it is very important that the energy auditor and/or inspector assess the property and speak with the client to determine the presence of mold or building and environmental conditions that can produce mold or exacerbate existing mold conditions.

Although mold can appear in any part of the house, it is most often associated with bathrooms, basements, and crawlspaces. Mold-producing conditions can result from any type of water leak, water damage, or flooding. Mold can also result if the basement or any other area in the home gets damp and wet. Water collecting around the perimeter of the dwelling from improper drainage, underground water supplies lack of proper gutters, roof leaks, excessive condensation, and numerous other conditions can also contribute to the growth of mold. Mold will not grow if moisture is absent.

Sub-grantees must incorporate a thorough mold inspection protocol as part of their routine reweatherization assessment of the dwelling. If mold is found during the inspection process:

- Document the mold with photos.
- Determine what may be causing the problem.
- If the exposed surface area of the mold is less than two square feet, you may consider proceeding if addressing the measure will stop the moisture problem. It is highly recommended that photo documentation of before and after work is taken and placed in the client file.
- **If more than two square feet of mold or moisture present, and it is determined that the work would probably not stop the water intrusion or the scope of work required is beyond allowable measures, a Deferral of Services situation exists.**

The presence of mold should be documented in writing on the assessment form and in pictures in the client file. All visible signs of mold should be cleaned by the client before any work is begun. Weatherization funds cannot be used for this activity. The presence of more than two square feet of visible mold that cannot be cleaned may warrant a referral to the county health department. Likewise, if during the client interview, the client indicates that a household member has experienced unusual itchy eyes, sneezing, coughing, rash, flu-like symptoms, itchy skin, etc. and the visible signs of mold are present, a referral to the local health department may be warranted. In such cases, weatherization should be deferred pending a determination on how to proceed.

Sub-grantees are encouraged to proceed with caution when considering dwelling units for weatherization where the presence of mold has been discovered. In the vast majority of cases, the cleaning and removal



of mold coupled with activities designed to alleviate the original causes of the mold, i.e., improved ventilation, addition of a bathroom or kitchen fan, a change in client behavior, etc. may be all that is necessary to effectively address the situation. Refer the client to the EPA's 'A Brief Guide to Mold, Moisture and Your Home' as to how to proceed with cleanup.

However, the sub-grantee may encounter a situation where the presence of mold is more than 10 square feet and where the conditions that produced the original mold are not easily corrected or are beyond the scope of what weatherization can handle (i.e. the dwelling unit is constructed over or near a stream that permeates through the dirt floor crawl space or cellar, or the dwelling unit has been constructed in an area with a high water table and poor drainage making the presence of ground water a consistent variable that must be taken into account). In such cases, weatherization may not have to be deferred.

Instead of tightening the building, performing air sealing, installing insulation, and doing other conventional measures, the energy auditor and weatherization coordinator may have to consider ground water and its ramifications for the structure to prevent or reduce moisture penetration into the basement and crawlspace. This includes dehumidifying, adding mechanical ventilation, removing standing water from the perimeter of the dwelling, and spending as much time as possible with the client to explain the dynamics underlying the energy performance of their home, it's location in relation to the moisture source, and how this effects the structure and its energy system. Before completing the work scope, the sub-grantee must consider whether performing air sealing, insulating, adding mechanical ventilation/dehumidification, performing heating system work, and the other weatherization protocols will make the mold conditions worse, the same, or improve. Sub-grantees are encouraged to thoroughly document the conditions of the dwelling unit and the surrounding areas with pictures and relevant data. In some cases, it may be best to advise the client that energy savings from weatherization will be relatively modest because the work is aimed at measures to prevent further moisture penetration and damage to the building. Energy savings may be more attributable to various base load measures related to lighting, refrigeration, and other related control devices.

As with other potential problems, the presence of mold is best handled through a "whole house approach." However, it is best to approach the presence of the mold as a condition that requires additional work to determine the cause(s) of the mold and the likely ramifications, if any, as a result of performing traditional "whole house" weatherization protocols.

## ASBESTOS POLICY

In general, asbestos removal is not an approved health and safety weatherization cost. Asbestos should not be disturbed if at all possible. The guidelines are:

- Removal is allowed and may be necessary when the measure will provide a cost effective savings-to-investment ratio, normally true of large, multifamily heating systems.
- Removal and replacement of asbestos siding for purposes of wall cavity insulation is permissible if allowed by state and local codes. Sub-grantees are required to contact the local building codes department to determine the correct course of action.
- When permitted by code or Environmental Protection Administration (EPA) regulations, encapsulation (usually less costly measures that fall short of asbestos removal) may be used.
- Weatherization Assistance Program sub-grantees encountering an asbestos situation should contact the Georgia Environmental Finance Authority (GEFA) for direction before proceeding when blower door testing or work is performed.

**Note: Refer major asbestos problems to the Georgia Department of Environmental Protection Division (EPD) and/or the EPA.**

## **NATIONAL HISTORIC PRESERVATION (SHPO)**

The projects funded are subject to review under Section 106 of the National Historic Preservation Act, 16 U.S. C 470F (NHPA) and its implementing regulations at 36 CFR part 800 which include rehabilitation, energy efficiency retrofits, renewables, and weatherization undertakings. The Advisory Council on Historic Preservation issued a program comment in March 2013 which extends the existing agreements based on the Department of Energy prototype for the Weatherization Assistance Program (WAP), State Energy Program (SEP), and Energy Efficiency and Conservation Block Grant (EECBG) until December 21, 2020. Refer to the comment for more details.

<http://www.achp.gov/docs/Federal%20Register%20Announcement%20of%20Issuance%20of%20DOE%20Program%20Comment%203-14-2013.pdf>

## **COORDINATION WITH OTHER NON-PROFITS AND AFFORDABLE HOUSING PROGRAMS**

The Georgia Environmental Finance Authority (GEFA) encourages sub-grantees to work with local housing agencies to coordinate the Weatherization Assistance Program (WAP) resources. GEFA requires the sub-grantee to conduct an energy audit on the assisted project early in the partnering process. The energy audit must comply with federal requirements of the program and provide a comprehensive analysis of the energy systems providing heat, hot water, air conditioning, and lighting to the building's heated envelope. The results of the energy audit should be included in the overall scope of the program. Strong communication is needed between the partners to ensure the following core program principles are maintained:

- Clients must be eligible under WAP rules.
- There must be a WAP energy audit with a concern for health and safety that documents the scope of the work the WAP is funding.
- Materials and installation standards must meet WAP requirements.

GEFA recommends that sub-grantees and local housing agencies initiate a dialogue early in the process to coordinate program resources. Understanding each program's mission is fundamental in knowing what can be accomplished by each program and in knowing the limitations and opportunities inherent in coordination. GEFA staff is available to assist sub-grantees who are interested in establishing contacts with their local counterparts. GEFA is committed to an open and flexible approach to facilitate coordination between sub-grantees and local housing agencies. Affordable housing is often made possible when resources from various programs are brought together to produce a result far greater than any one program was capable of achieving by itself. With limited resources and mounting energy costs, we strongly believe that coordination of resources is essential to provide the greatest benefits to those who need our services.

## QUALITY CONTROL AND QUALITY ASSURANCE FOR WEATHERIZATION UNITS

### Energy Audits and Inspections

Georgia uses the Weatherization Assistant software, which includes the National Energy Audit Tool (NEAT) and Mobile Home Energy Audit (MHEA), to assess buildings when repair costs will add to the installation costs of that measure, when option measures are to be installed, or when mechanical systems must be replaced. This audit may also be employed when electrical baseload measures (i.e., lighting or refrigerator appliance replacements) are considered. All refrigerator replacements must show documentation in the client file that the appliance was metered for at least two hours, and the Savings to Investment ratio (SIR) is equal to or greater than one.

For single family and manufactured homes (mobile homes), work shall be done according to the priority list of measures. The Weatherization Assistant software (NEAT/MHEA) must be used when completing work outside the parameters of the priority list. It is the responsibility of the sub-grantee's energy auditor to assess the existing conditions of the dwelling unit/structure and record the information. An energy audit must be completed before the commencement of any work. The energy audit must include each of the following diagnostic measures:

- Blower door test for air infiltration/exfiltration (manometer in calibration)
- Combustion safety testing (combustion analyzer in calibration)
- ASHRAE 62.2 (current WAP calculator)
- Efficiency test of heating distribution system and related controls
- Inspection of moisture problems and presence of mold or mildew
- Inspection for potential lead based paint hazards
- Determination of condition and effectiveness of previous weatherization measures, if any
- Indoor air quality tests where applicable
- Assessment of overall condition of structure, including the proper identification of the building envelope
- Evaluation of client HVAC system usage/operation
- Assessment of ventilation/venting systems
- Pressure pan testing/duct testing (target 1 Pascal or less)
- Base load usage analysis (refrigerator/DWH replacement-NEAT/MHEA-WAPTAC ([http://waptac.org/data/files/Website\\_docs/Training/Standardized\\_Curricula/Curricula\\_Resources/Refrigerator\\_Info\\_Toolkit.pdf](http://waptac.org/data/files/Website_docs/Training/Standardized_Curricula/Curricula_Resources/Refrigerator_Info_Toolkit.pdf)))
- Determination of any other health and safety issues

### Repairs and Replacement

Certain repairs may be completed in the course of providing Weatherization Assistance Program (WAP) assistance. However, sub-grantees are reminded that the overall goals of the WAP are to reduce energy use and heating and cooling costs by improving energy efficiency and ensuring health and safety. All repairs provided under the program must be incidental and consistent with the mission of the program. The following energy related repairs may be permitted, when necessary:

- Ventilation may be installed in situations to mitigate health and safety or moisture problems encountered in a dwelling unit including proper ventilation of combustion appliances.

- Heating and cooling system repair or replacement is permitted to increase efficiency or useful life of the system or to provide for the proper distribution of heat to occupied areas. Replacement must be based on Health and Safety and/or NEAT/MHEA justified energy conservation measure (ECM) with a savings to investment ratio (SIR) of one (1.0) or above.
- Chimneys may be relined or repaired when the existing chimney condition creates an unsafe or inefficient condition during the operation of the primary heating appliance. In situations where an existing chimney is inadequate for the proper venting of combustion appliances other than the primary heating appliance, alternative cost effective methods of venting those appliances should be explored, and the most cost effective measure must be utilized.
- Hardwired lighting fixtures may be replaced to accommodate more energy efficient lighting or when existing fixtures are unsafe. Ground fault circuit interrupters (GFCI) may only be installed in areas to ensure safe installation of an ECM measure.
- A roof may be repaired as an incidental repair measure (IRM) only when it is necessary to protect insulation that has previously been installed or is proposed as part of the work scope for the unit.
- Electrical circuits may be upgraded as an IRM only in conjunction with the installation of a weatherization measure. For example, the installation of a new heating appliance, hardwiring for smoke alarms, or ventilation appliance requires a circuit that is not currently present or adequate.
- High efficiency heating appliances should always be considered over standard efficiency appliances if supplemental utility funds are available. However, if supplemental funds are not available, a standard efficiency unit may be installed.
- Installation of atmospheric heating appliances is not allowed.

### **Final Inspection**

The Department of Energy (DOE) requires that Quality Control Inspectors (QCIs) working for the WAP possess the knowledge, skills, and abilities in the National Renewable Energy Laboratory (NREL) Job Task Analysis for Quality Control Inspectors. This requirement applies to all individuals who perform an evaluation and approve work performed in homes including final inspectors and state monitoring staff.

The Georgia Environmental Finance Authority (GEFA) will ensure that QCI competency is demonstrated by mandating certification as a Home Energy Professional Quality Control Inspector (HEP QCI). GEFA will require that each state program monitor become certified as a HEP QCI. The GEFA QCI will perform quality assurance reviews on at least 10 percent of all completed units. GEFA may also hire a third party contractor with the HEP QCI credentials. Each sub-grantee will employ or contract with a certified HEP QCI. Because GEFA is ultimately responsible for ensuring that every unit reported to DOE meets the work quality guidelines required by the WAP Quality Work Program (QWP), sub-grantees must submit the credentials of all staff employed as a QCI and of any third party organizations engaged. Each sub-grantee will nominate the individual selected to be their QCI and register them with the state. GEFA will implement policies and procedures to address situations when the QCI is not inspecting units using the standards adopted by the state and consistent with Standard Work Specifications (SWS). This policy will include remedial action that will result in the denial of the unit for reimbursement until the final inspection is conducted by a QCI and additional monitoring to ensure that state protocols are consistently followed. If state protocols are not consistently followed, the sub-grantee risks the state reducing their funding allocation and using the funds to hire a third party QCI or having funds reallocated to another sub-grantee.

GEFA will require that every DOE WAP unit reported as a "completed unit" must receive a final inspection by a certified QCI, ensuring that all work meets the minimum specifications outlined in the SWS in

accordance with 10 CFR 440. Every client file will have a QCI form that certifies that the unit had a final inspection and that all work met the required standards. If a unit has received a final inspection and has been monitored by the state, two certification forms will be available in the client file, one for each inspection. The QCI certification form will require the QCI certification status and certification number. The inspection will include an assessment of the original audit and confirm that the measures called for on the work order were appropriate and in accordance with the state audit procedures and protocols approved by DOE.

Training & Technical Assistance activity is driven by identification of problems and issues in the field and through interviews with the crew and supervisors. Additionally, during the annual network meeting for all weatherization sub-grantees, training needs are discussed, and a plan for the year is produced from input of sub-grantees. GEFA created a WAP tracking database in iGEFA that allows us to track and assess agency monitoring results and is reviewed monthly to track improvements. Agencies are ranked 1) At-Risk, 2) Standard and 3) High Performing. GEFA prioritizes efforts with at-risk agencies to get them back to standard classification.

On-site monitoring provide ideal conditions during which sub-grantees may be evaluated and areas in need of improvement can be identified. In addition to the formal monitoring reporting that tracks deficiencies and findings and outlines how to make improvements, monitoring visits allow for a comprehensive review of the agency. On-site monitoring includes at least 10 percent of completed homes and includes a thorough client interview to determine outcomes, crew behavior, energy use reduction and overall impressions. Such review may include technical and financial systems and procedure, follow up on previous training outcomes and identification of future training needs and the sharing of "Best Practices" at all levels of operation.

Monthly budgetary reviews enable the grantee to analyze sub-grantee performance and productivity. GEFA has created a tracking sheet in iGEFA that easily helps track spend by agency by contract. This is updated by a GEFA program manager every month. If production and/or expenditures are deemed insufficient, GEFA may recapture and redistribute funds to other sub-grantees that are meeting or exceeding production and quality work standards, without having a public hearing. GEFA will offer assistance, as resources allow, helping sub-grantees increase production to successful performance levels. This assistance may include special technical or administrative training of sub-grantee staff.

In an effort to make improvements, GEFA has expanded the monthly T&TA calls with the agencies. GEFA will now cover the monthly invoices, production, and spend on the calls. If an agency is behind or having trouble, we hope that other agencies might be able to offer assistance.

Each agency is to use the pre and post weatherization pictures to verify conditions at the time of final inspection for each dwelling unit. Each final inspection is to have pictures included as a representative sample of the major work that has been performed on the unit. The pictures are to be included with every client file that has had a completed final inspection.

In order to calculate the most accurate energy savings, sub-grantees are required, when possible, to obtain 12 months' prior energy usage of metered energy sources for each dwelling to be weatherized.

Each agency will be expected to collect success stories that have occurred throughout the program year. We are constantly exploring ways to make the program more accountable and to adopt systems that improve service delivery.

## MONITORING ACTIVITIES

Georgia has elected to implement one of the Department of Energy (DOE) standard options for the administering quality control inspections Independent Auditor/QCI. The auditor performs the audit, creates the work order, and performs the final quality control inspections. The auditor will not be involved in any of the actual work on the home. Each sub-grantee must have a certified QCI on staff or must have a third party certified QCI perform final inspections on each unit as a "completed unit" to the Georgia Environmental Finance Authority (GEFA).

The GEFA QCI will perform quality assurance reviews on at least 10 percent of all completed units. In accordance with 10 CFR 440 and WPN 16-4, GEFA, as the grantee of the DOE Weatherization Assistance Program (WAP), has an established monitoring system for evaluating sub-grantee performance regardless of funding source.

Monitoring functions will be the state's principal method for determining sub-grantee compliance with the regulations contained in 10 CFR 440, applicable OMB circulars, DOE Assistance Rule 10 CFR 600, Weatherization Program Notices and any other procedures that DOE may issue. Additionally, monitoring activities will ensure the evaluation of actual accomplishments against planned activities and determining the effectiveness of WAP policy. Monitoring also provides objective reporting to and from sub-grantees and makes recommendations to address program and administrative deficiencies and needs. To fulfill this requirement, GEFA will conduct comprehensive monitoring of each sub-grantee at least once a year.

Each sub-grantee will be visited by a technical field representative at least once a year to review no less than 10 percent of completed units. Each sub-grantee may be visited by an administrative representative at least once per year and undergo remote desk monitoring, to review no less than 10 percent of the completed units' files. Program year is defined as April 1 through March 31.

The steps outlined in the GEFA Monitoring Protocol will be followed regarding the reports and any possible follow-up actions. Monitoring reports include a reminder that suspension of funding is possible if a sub-grantee fails to respond within the allowable time frame.

A monthly desk review for each sub-grantee must be performed. Budget category expenditures and completion rates will be compared to planned rates (as outlined in DOE grant application request). Minimum and maximum cost averages for total dwelling, Regular Weatherization and Health and Safety expenditures will be monitored for compliance with WAP guidelines and contract limitations. Materials, labor, and program support cost averages will be monitored to ensure they are maintained at acceptable program levels. Additionally, GEFA weatherization staff will review invoices for timeliness of submission and compliance with Weatherization Program Policy.

In an effort to validate compliance, GEFA staff will perform impromptu checks of sub-grantee weatherization programs to ensure a continual high performance level on the part of weatherization staff. During these visits, client files and onsite reviews will be conducted to capture the sub-grantee's day-to-day activities.

### **Administrative/Fiscal Review**

This review is primarily concerned with the contractual, administrative and accounting aspects of the program operations and does not include a field review. GEFA fiscal staff schedule the reviews



independently based on GEFA accounting procedures, and while some areas will overlap, this form of monitoring is not the same as a monitoring visit based largely on field work evaluation. The following areas will be the primary focus of the administrative/fiscal review:

- A review of sub-grantee's A133 audit each year
- The cost or purchase and delivery of weatherization materials (10 CFR section 440.18(2)(1). Funds may only be expended on weatherization materials in Appendix A of 10 CFR part 440 or as approved by DOE
- Labor costs in accordance with CFR section 440.19
- Purchase or annual lease of tools, equipment and/or vehicles, except that any purchase of vehicles must be referred to DOE for prior approval in every instance (10 CFR section 440.18(c) (6)).
- The costs of incidental repairs to make the installation of weatherization materials effective (10 CFR section 440.18(c) (9))
- The costs of liability insurance for weatherization projects for personal injury and property damage (10 CFR section 440 .18(c) (10))
- The cost of carrying out low cost/no cost weatherization assistance (10 CFR section 440.20).
- The cost of WAP financial audits in accordance with 10 CFR section 440.23
- Administrative costs (10 CFR section 440.18(c) (13))
- The costs of eliminating health hazards necessary to ensure the safe installation of weatherization materials (10 CFR section 440.18(c) (15))

### **Technical Monitoring**

GEFA has the responsibility for on-site monitoring of all WAP sub-grantee agencies. The weatherization staff's monitoring activities include:

- Monitoring 10% of the completed units. GEFA has a planned monitoring schedule
- Please see the attached Technical Monitoring Document for details on eligibility, rental, field work and client file data
- Inspecting a sample of the dwellings completed by the sub-grantee for each funding source (Regular DOE and DHS-HHS)
- Reviewing program operations to ensure proper administration of allocated funds
- Evaluating sub-grantee for achieving performance standards based on criteria set forth by GEFA
- Determining training and technical assistance needs to push Tier 1 and Tier II training

### **Phase I**

GEFA representative will notify the sub-grantee of upcoming monitoring visit and make available all the necessary forms for completion. The sub-grantee will supply the GEFA representative a list of completed projects for the period to be monitored. The sub-grantee will complete and return the Pre-Monitoring Questionnaire by pre-determined date.

### **Phase II**

The GEFA representative will randomly select the units to be inspected. The GEFA representative will randomly select onsite files to be reviewed.

### **Phase III**

On-site monitoring will attempt to focus on inspections, since desk monitoring will try to satisfy most administrative reviews, including financial examination. A key component of on-site monitoring will be to provide timely training and technical assistance during the course of on-site monitoring.

Combustion Safety Monitoring will be performed on-site. Units that are completed or in-progress will be monitored. Workers, assessors and inspectors and all combustion safety related work will be specifically reviewed for program adherence to all combustion safety related guidance, guidelines and standards.

Diagnostic testing is performed, including blower-door tests, combustion safety tests, and pressure differential tests. The test results are compared with those noted in the client file.

Client interviews will be performed to assess worker behavior, workmanship and client satisfaction.

Inspection of completed units, with the sub-grantee auditor/inspector, provides an opportunity to provide on-site technical assistance. Various installation techniques, quality control issues or test procedures may be discussed during the course of performing the inspection.

The set-up values of the NEAT/MHEA audit tool are checked to ensure they are current and accurate, that sub-grantee staff is proficient in the use of the NEAT/MHEA audit tool, and that the audit tool is used as directed by GEFA.

Exemplary practices, successful approaches or creative ideas in the operation of the local program will be identified and noted.

Crew Health and Safety procedures will be checked for compliance with the GEFA Health and Safety Plan as contained in the DOE State Plan, and OSHA standards.

An exit interview with the sub-grantee's executive director, weatherization director/coordinator and other appropriate staff will be held at the conclusion of the monitoring visit to present and discuss preliminary findings, observations and recommendations.

A final written monitoring report to the sub-grantee will be issued within 30 days of any completed monitoring visit. The report will contain a description of the monitor's findings, observations and recommendations for corrective action. The sub-grantee will submit a written response within 30 days of the receipt of the monitoring report, providing assurance that identified problems are resolved in a timely manner and documented. The executive director's signing and returning the monitoring report indicates the sub-grantee's acceptance of the report. The response will be reviewed by GEFA and a letter from the weatherization program monitor of acceptance or explanation will be forthcoming.

### **Appeals**

Should any issues be unresolved, they will be addressed in a subsequent monitoring visit/report. Should a sub-grantee wish to appeal or seek clarification in the monitoring report, the sub-grantee may submit their request in writing to the state's weatherization program manager. The appeal should be sent within 30 days of receipt of the monitoring report. GEFA will review and respond within 15 days of the receipt of the appeal. Any sub-grantee that does not agree with the initial outcome of the monitoring report appeal may submit a subsequent appeal to the GEFA's Executive Director. The sub-grantees are also subject to visits

from DOE, U.S. Department of Health and Human Services and the Georgia Department of Human Services.

GEFA's executive director may suspend or terminate a contract with a weatherization sub-grantee any time for any cause. "For Cause" shall mean, at minimum, a finding of non-compliance with the procedures established by this section. In case of sub-grantee failure to comply substantially with the provisions of the Energy Conservation in Existing Building Act of 1976 or of 10 CFR, Part 440, GEFA, may take immediate steps to suspend or terminate the contract with that agency. Cause for suspension or termination of contracts shall include:

- Failure to maintain adequate fiscal controls and accounting procedures
- Filing late and inaccurate financial and programmatic reports
- Misuse of program funds
- Inability of the sub-grantee to account for all materials and equipment purchased
- Failure to adhere to the schedule for goals and objectives established
- Provision of weatherization services, which are not done in quality manner
- Failure to use weatherization materials which meet or exceed federal specifications
- Failure of a sub-grantee to comply with the terms of a contract
- Failure to comply with audit requirements
- Failure to comply with required procedures
- Discrimination of employees
- If a project or program is supported over two or more funding periods, suspension or termination may occur due to the failure to submit required reports still due from the prior period

GEFA will review the sub-grantee's productivity in relation to the established production goals and/or quality of the sub-grantee's work on a monthly basis and based upon the sub-grantee's specific and performance circumstances, GEFA will take these actions:

- Allow the sub-grantee to continue operations at the existing funding level and thereafter conduct more frequent performance review.
- Reduce the funding level for the sub-grantee and provide unexpended allocated dollars and service territory to another sub-grantee.
- Require the sub-grantee to select a non-profit delegate in cooperation and with assistance from GEFA to meet production goals in a specified time frame.
- Reduce the funding to the sub-grantee and provide the dollars on a competitive basis to a qualified non-profit to service the defined geographic territory.
- Provide additional funding at a level that can be expended within the grant period, to sub-grantees exceeding production and/or meeting quality work standards.

Based on production levels and/or quality of work after the seventh month, GEFA may also take one or more of these actions for reallocation of funds:

- Reduce the funding level for the sub-grantee and provide additional funding to sub-grantees meeting or exceeding production at GEFA's discretion.

- Allow sub-grantee to retain existing grant dollars if the funds can be expended and production met within a specified timeframe.
- Offer grant dollars on a competitive basis to a qualified non-profit willing to serve those geographic areas where the production goal is not being timely met or work quality is not up to standards.

On-site monitoring of a selected number of completed units will be performed by GEFA on an ongoing basis to ensure that weatherization program standards are met. In addition, GEFA may conduct satisfaction surveys to recipient households to ensure that local programs are effective and customer friendly.

Results from the surveys are published in the monitoring report. GEFA will reserve the right to reduce or add sub-grantee funding and add providers to ensure that WAP dollars received by the state of Georgia are effectively expended within the time frame required by DOE.

Should any of the sub-grantees that are identified in this plan cease to administer WAP during the year covered by this plan for any reason, GEFA will work with the existing agency network to provide for that service area and will not require a public hearing. If a new agency is required to be added to the network to provide coverage for the service area, a public hearing will be held. According to the Weatherization Program Notice 02-1 and 10 CFR Part 440, states are reminded that Community Action Agencies are given preference.

## **ELECTRONIC DATA COLLECTION/MANAGEMENT/REPORTING**

Sub-grantees must have the capability to collect and manage Weatherization Assistance Program (WAP) data electronically, using the current Weatherization Data Collection and Reporting Database (Hancock Energy Software). In addition, sub-grantees must be capable of transferring and receiving WAP data, spreadsheets, and Georgia Environmental Finance Authority (GEFA) text documents electronically and by connecting to the internet.

## REQUEST FOR PAYMENT AND INVOICING GUIDELINES

All sub-grantees must submit on a monthly basis a payment request consisting of an invoice and a statistical report of the sub-grantee's production activity and indirect expenditure during the previous month. The sections below detail the invoicing and reporting process that should be followed to submit to an electronic payment request to the Georgia Environmental Finance Authority (GEFA) via the Hancock Weatherization Assistance Program (WAP) System. For more detailed information regarding general reporting requirements, refer to the appropriate weatherization program contract.

### General Guidance

The purpose of this section is to identify specific documentation and reporting requirements that have changed as a result of electronic monthly reporting. All contractual requirements pertaining to documentation and reporting are still in effect per weatherization program contracts, unless specifically stated otherwise in the following sections.

### GEFA Hancock Support

All Hancock-related emails for GEFA's attention should be sent to [alfreda@gefa.ga.gov](mailto:alfreda@gefa.ga.gov).

### Client Files

The electronic reporting process does not change the requirement to maintain certain documents in each client's file, as specified in each contract, with the exception of the Building Check and Job Order Form (BCJOS) which documents measures installed and client verification of work performed on the unit. This form is no longer necessary. In place of the BCJOS, the Inspection Report for each Work Order issued should be maintained in the client files. The report(s) for each job/unit should be printed out, signed, and dated by the inspector.

### Agency Files

Monthly Invoicing: Each agency is required to maintain a signed and dated copy of the invoice submitted in Hancock in the agency files.

T&TA Documentation: Each agency is required to maintain and submit copies of Training and Technical Assistance (T&TA) documentation in Hancock (forms and receipts) and in the agency files.

Monthly Tool and Equipment Inventory Report: Each agency is required to maintain a monthly record of tool and equipment purchases, per contract requirements.

Vehicle Lease and Insurance Form: Each agency is required to maintain appropriate documentation of vehicle lease and insurance expenditures, per contract requirements. Submission to GEFA is required.

### Agency Role

Each agency needs to ensure that Hancock information is communicated to all Hancock system users and more specifically, any personnel involved in any aspect of the monthly reporting process. Agencies should:

1. Discuss what roles and responsibilities each member of the team will have for entering, reviewing, or approving system data.
2. Ensure team members are informed of Hancock resources, training opportunities, policies, and procedures (role of Agency Hancock POC, and GEFA support).

## Hancock Monthly Reporting Guidance

### Client Module

#### Demographic Data

Demographic data should be collected for each member of the household.

#### Social Security Numbers

The Department of Human Services now requires that Social Security Numbers (SSN, last four digits only) be provided for the client applicant, not the other members of the household. To ensure the security of the data collected, the SSN number will be submitted in a series of zeroes and four digits, which represent the last four numbers of the client's SSN. A Social Security Card must be provided, but it will only collect the last four digits of the SSN for recording purposes. It is not a requirement to copy the Social Security Card for your records or write down the entire number. SSN data entry requirements are as follows:

- SSN must be provided for all client applicants starting with the September 2010 monthly report and forward (SSN requirement does not apply to other household members).
- Format for entering the SSN in Hancock is "000001234," where "1234" represents the last 4 digits of the client's SSN.
- If the full SSN was previously recorded in client files, revise the data in accordance with the format defined above.

#### Priority Audit – Labor

To properly record labor in the Labor Cost column, a Work Order has to be created from the Priority Audit screen. This is a requirement for processing prior work reported as well current work. Labor should only be recorded under the measures Program Operations (PO) or Health and Safety (HS) Crew Labor and PO or HS Contractor Labor, which indicates what budget the funds will be expensed to. Labor should not be recorded under any other measures, and conversely, measure costs (i.e., material) should not include any labor costs. More specifically, direct contractor labor should not be lumped in with material costs and should be recorded separately. Direct labor cost must be allocated to each unit weatherized (for both single family and multifamily units). Labor costs can be averaged among all units weatherized in a reporting period, rather than be computed for each unit individually, as long as a systematic process is employed. Allocating labor cost based on a percentage of material costs is also an acceptable methodology.

#### Multi-family List/Project

Multi-family data entry is very similar to what is required for single family units. This section highlights where multi-family project data entry and policy differ from that of single family units. GEFA programmatic policy regarding entering multifamily project data in Hancock is as follows:

- Multi-family project data collection
  - A project is defined by the primary address – street address, city, county, and zip code.
    - In order for units to be "linked" in the same project, all components of the primary address for each unit have to be exactly the same, in all regards (i.e., spelling, capitalization, abbreviation).
    - The address of the landlord's point of contact should be used as the primary address (i.e., the property manager).

- Data will be collected for each individual unit and each member of the household, to facilitate statistical data compilation, even though multi-family units are U.S. Department of Housing and Urban Development (HUD) pre-qualified.
- Multi-family projects consisting of more than one building will be recorded as one project.
  - For record keeping purposes, use appropriate nomenclature in the unit's address to distinguish between buildings (i.e., Bldg. 2/Apt 233)
- Use the "Add Client" button to add units to a project (recommended/preferred method).
- The "Link Client" method of adding a unit to a project is not recommended and should only be used to make a correction. For example:
  - A client had already applied for weatherization prior to the multi-family project, and was not associated with the project. Use the "Link" button to link that client to the multi-family project.
  - If you have to change a client's address, you first have to "unlink/delink" that client from the project. Change the client's address and then relink that client to the project.
- Priority audit
  - A priority audit only needs to be completed on 10% of the units. However, the priority audit screen must be used to record the measures installed in each unit.
    - All work performed on multi-family units must go through the Work Order-Install-Inspection process.
    - Direct labor must be allocated to each multi-family unit. No labor will be allocated to common areas.
- Vacant units
  - The GEFA WAP Rental Work Agreement states, "Owner certifies that vacant units will become an eligible dwelling unit within 180 days. An eligible dwelling unit is a unit occupied by a family unit that meets the income criteria as stated in §440.22 of 10 CFR Part 440."
  - Project Cost Limit – vacant units can be weatherized, but they do not factor into the determination of the project cost limit regardless of whether the unit is eligible or ineligible. If there are 25 units and 5 units are vacant, the project cost limit =  $20 \times \$6500 = \$130,000$  (or \$5,200 per unit).
    - **NOTE: The Project Cost Limit calculated in Hancock may not be accurate due to the fact that it includes "certified" vacant units in the calculation. If a project includes vacant units, agency personnel need to manually monitor cost per unit in accordance with the Project Cost Limit calculation methodology detailed above.**
  - The protocol for entering demographic data for a vacant unit is shown in Table 1.
- Mixed eligibility units (mixed-use projects) will be handled the same way vacant units are in regards to requiring owner certification and determining Project Cost Limit.
- Fuel usage data does not need to be entered for a building that uses a common heating source rather than an individual source for each unit.
- Common areas
  - If the multi-family project consists of more than one building, the weatherization work performed in the common areas (i.e., measures installed) will be recorded separately for each building.



- Weatherization work performed in one or more common areas of a building will be recorded collectively so multiple common areas in a building will be treated as one for the purposes of data entry.

**Table 1**

<b>Demographic Data for Eligible/Ineligible Vacant Unit</b>
<p>Even though the unit is vacant, “dummy” client demographic data has to be provided to register the unit in Hancock as either eligible or ineligible for weatherization. The minimum demographic data that should be entered for a vacant unit that needs to be registered as an <u>eligible unit</u> is as follows:</p> <ul style="list-style-type: none"> <li>• First Name: Vacant</li> <li>• Last Name: Unit X (X is a unique number that equals the street or apartment number of the unit being weatherized. If all units in the project have the same street number, use the apartment number instead.)</li> <li>• Number of Occupants: 1</li> <li>• Annual Income: \$0.00</li> </ul> <p>Default/optional fields:</p> <ul style="list-style-type: none"> <li>• Age: 18-59 (choose)</li> <li>• Gender: M (default)</li> <li>• Disability: No</li> <li>• Relation: HH (head of household)</li> </ul> <p>The minimum demographic data that should be entered for a vacant unit that needs to be registered as an <u>ineligible unit</u> is as follows:</p> <ul style="list-style-type: none"> <li>• First Name: Vacant</li> <li>• Last Name: Unit X (X is a unique number that equals the street or apartment number of the unit being weatherized. If all units in the project have the same street number, use the apartment number instead.)</li> <li>• Number of Occupants: 1</li> <li>• Annual Income: \$25,000.00</li> </ul> <p>Default/optional fields:</p> <ul style="list-style-type: none"> <li>• Age: 18-59 (choose)</li> <li>• Gender: M (default)</li> <li>• Disability: No</li> <li>• Relation: HH (head of household)</li> </ul>

**Rework**

Any rework performed on a unit that was previously invoiced must be approved by GEFA. To open up a particular unit/job for rework, the following procedures should be followed:

1. Select the job from the Client List or the Job List.
2. Go to the Audit Information/Site Assessment screen.

3. Click the on the Rework box (located slightly to the left, just above the green “House Information” banner).
4. Click the Save button to submit the Rework Request to GEFA.
5. The Need Approval box should then get checked because the Rework Request has to be approved by GEFA. (There was a slight glitch on the Training System, and this didn’t happen. But the Rework and Measure Request did show up on the State Approval List.)
6. Once the request has been approved by GEFA, you can go back to the Priority Audit screen and add the necessary measure(s).

## **JOB MODULE**

### **Jobs/Units**

There are two methods of submitting jobs/units in Hancock for invoicing:

Method 1: For current units/jobs (September 2010 and forward), units are required to be processed through the Priority Audit, Work Order, Install and Inspection screens/functions before being invoiced. This requirement applies to multi-family projects as well as single family units.

Method 2: For past work performed that has already been reimbursed by GEFA (i.e., back data entry), the units can and should be invoiced once all the measures, cost, and install dates have been entered on the Priority Audit. However, a Work Order must be created for Labor to be properly recorded. Note that this method is only allowable for back data entry.

### **Labor Cost**

The requirements for recording and allocating Labor Cost were detailed in the Priority Audit – Labor section. To properly record in the Hancock:

- Labor cost must be recorded in the “Labor Cost” column (not the Materials Cost column).
- A Work Order must be issued in order for labor cost to be recorded correctly in the “Labor Cost” column.

## **INVOICING MODULE**

The purpose of this section is to clarify the type of invoice (combined fund/project type) that should be submitted to GEFA and the process for creating/building and submitting an invoice in Hancock.

### **Type of Invoice**

1. An invoice that combines all weatherization fund and project types used during the reporting period shall be submitted to GEFA on a monthly basis.
  - a. Each agency will only submit one invoice per month.
  - b. Both single family and multi-family projects (that are completed) will be included in the combined invoice.
2. The combined monthly invoice will include all units completed during the reporting period. The exception is multi-family which must be entirely completed before it can be invoiced.

Policy and procedures regarding data for Hancock can be found at <https://hancocksoftware.zendesk.com/hc/en-us/categories/200313504-Weatherization>.

## DEFINITIONS/ACRONYMS

**Air Infiltration:** The exchange of air through the envelope of the dwelling. Most common air infiltration areas are around doors, windows, heating and cooling units, and wall top plates in attics.

**Air Sealing:** Activities implemented to reduce the amount of air infiltration in a dwelling.

**American Society of Heating, Refrigerating and Air-Conditioning Engineers (ASHRAE):** Founded in 1894, it is a global society advancing human well-being through sustainable technology for the built environment. The Society and its members focus on building systems, energy efficiency, indoor air quality, refrigeration, and sustainability within the industry. Through research, standards writing, publishing and continuing education, ASHRAE shapes tomorrow's built environment today. ASHRAE was formed as the American Society of Heating, Refrigerating and Air-Conditioning Engineers by the merger in 1959 of American Society of Heating and Air-Conditioning Engineers (ASHAE) founded in 1894 and The American Society of Refrigerating Engineers (ASRE) founded in 1904.

**Blower Door:** An apparatus used to identify the amount of air exchange measured in cubic foot per minute (CFM). This tool draws air in through all openings by depressurizing the dwelling.

**Carbon Monoxide (CO):** An odorless, tasteless, and colorless toxic gas produced when insufficient combustion air is supplied to an appliance, the burner is improperly tuned, and/or the appliance is malfunctioning. Combustion appliances produce exhaust gases that should be directly vented to the outside to avoid introducing combustion byproducts into the dwelling.

**Conditioned Living Space:** The most occupied area to be weatherized, i.e., the exterior and interior door(s), and the windows making up the conditioned living space to be weatherized (weather-stripping and threshold). Heating and cooling provided only for this area. An option to consider when the whole dwelling cannot be weatherized due to the envelope condition or the number of measures needed exceed allowable program funding guidelines.

**Coordinator:** The sub-grantee individual responsible for the implementation of the program, i.e., assuring that the diagnostic testing, inspections, work write-ups, bidding, and final inspections are performed in accordance to program guidelines. This individual is also required to attend mandatory Georgia Environmental Finance Authority (GEFA)/Weatherization Assistance Program (WAP) meetings and trainings.

**Combustion Analyzer:** A tool that measures oxygen, carbon monoxide, stack and ambient temperature when analyzing combustion gases.

**Dwelling Unit:** A house, a stationary manufactured home, an apartment, a group of rooms, or a single room occupied as separate living quarters.

**Energy Conservation Measure (ECM):** Any type of technology, program, or project aimed to reduce energy consumption.

**Incidental Repairs:** Those repairs necessary for the effective performance or preservation of weatherization materials. Such repairs include, but are not limited to, framing or repairing windows and doors which could not otherwise be caulked or weather-stripped and providing protective materials, such as paint, used to seal installed materials.

**Measures:** A generic term used for all items to be addressed (repaired, replaced, or installed) in a dwelling.

**Manufactured Home Energy Audit (MHEA):** The Weatherization Assistant is an energy audit software tool developed for the Department of Energy (DOE) WAP by the Oak Ridge National Laboratory. The Weatherization Assistant contains the MHEA for mobile/manufactured homes. This tool determines cost effective weatherization measures based upon existing conditions of the unit, fuel costs, materials, and labor.

**Minor Repair:** Non-structural related repairs (walls, floors, or ceiling).

**National Energy Audit Tool (NEAT):** The Weatherization Assistant is an energy audit software tool developed for the DOE WAP by the Oak Ridge National Laboratory. The Weatherization Assistant contains the NEAT for site-built single-family houses. This tool determines cost effective weatherization measures based upon existing conditions of the unit, fuel costs, materials, and labor.

**Priority List:** A list of measures in order of energy efficiency and energy savings that will be addressed on each single family dwelling for site built and manufactured homes. Multi-family dwellings will require running the NEAT.

**Savings to Investment Ratio (SIR):** The calculated payback in energy savings based upon dollars invested through the installation/replacement of an inefficient energy consumption measure. The SIR must be equal to or greater than 1.0 to be cost effective.

## WEATHERIZATION PROGRAM DOCUMENTS

The following documents can be found on the Georgia Environmental Finance Authority (GEFA) website <http://gefa.georgia.gov/weatherization-program-documents>:

- Agency Documents
- Guides and Standards
- Georgia Weatherization Program Notices
- References and Training

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