

Nebraska
Department of
Environment and Energy
Weatherization Assistance Program

Program Year 2020 State Plan
July 1, 2020 – June 30, 2021

Department of Environment and Energy

Jim Macy, Director


P.O. Box 95085

Lincoln, NE 68509

402-471-3682

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ASSISTANCE AGREEMENT

1. Award No. DE-EE0007933		2. Modification No. 0006	3. Effective Date 07/01/2017	4. CFDA No. 81.042	
5. Awarded To Nebraska Department of Environment and Energy Attn: Dennis Burling 1200 N STREET, SUITE 400 LINCOLN NE 685082024		6. Sponsoring Office Energy Effcy & Renewable Energy EE-1 U.S. Department of Energy 1000 Independence Avenue, S.W. Washington DC 20585		7. Period of Performance 07/01/2017 through 06/30/2021	
8. Type of Agreement <input checked="" type="checkbox"/> Grant <input type="checkbox"/> Cooperative Agreement <input type="checkbox"/> Other	9. Authority PL 109-58, Energy Policy Act (2005)		10. Purchase Request or Funding Document No. 20EE001767		
11. Remittance Address Nebraska Department of Environment and Energy Attn: Dennis Burling 1200 N STREET, SUITE 400 LINCOLN NE 68508		12. Total Amount Govt. Share: \$11,244,737.00 Cost Share : \$0.00 Total : \$11,244,737.00		13. Funds Obligated This action: \$3,159,918.00 Total : \$11,244,737.00	
14. Principal Investigator	15. Program Manager KATHERINE L. FOOTE Phone: 240-562-1635		16. Administrator Golden Field Office U.S. Department of Energy Golden Field Office 15013 Denver West Parkway Golden CO 80401		
17. Submit Payment Requests To Payment - Direct Payment from U.S. Dept of Treasury		18. Paying Office Payment - Direct Payment from U.S. Dept of Treasury		19. Submit Reports To	
20. Accounting and Appropriation Data See Schedule					
21. Research Title and/or Description of Project WEATHERIZATION ASSISTANCE PROGRAM - NEBRASKA					
For the Recipient			For the United States of America		
22. Signature of Person Authorized to Sign			25. Signature of Grants/Agreements Officer 		
23. Name and Title		24. Date Signed	26. Name of Officer Nicholas C. Oscarsson		27. Date Signed 05/14/2020

CONTINUATION SHEET

REFERENCE NO. OF DOCUMENT BEING CONTINUED
DE-EE0007933/0006

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NAME OF OFFEROR OR CONTRACTOR
Nebraska Department of Environment and Energy

ITEM NO. (A)	SUPPLIES/SERVICES (B)	QUANTITY (C)	UNIT (D)	UNIT PRICE (E)	AMOUNT (F)
	<p>DUNS Number: 808820260</p> <p>In addition to this Assistance Agreement, this award consists of the items listed on the Cover Page of the Special Terms and Conditions.</p> <p>Current Budget Period: 07/01/2020 - 06/30/2021 Project Period: 07/01/2017 - 06/30/2021</p> <p>In Block 7 of the Assistance Agreement, the Period of Performance reflects the beginning of the Project Period through the end of the current Budget Period. The purpose of this action is to obligate Program Year 2020 funds and to authorize performance of Program Year 2020 activities.</p> <p>Funding for all awards and future budget periods is contingent upon the availability of funds appropriated by Congress for the purpose of this program and the availability of future-year budget authority.</p> <p>All other terms and conditions remain unchanged.</p> <p>DOE Award Administrator: Janice Callahan E-mail: Janice.callahan@ee.doe.gov Phone: 240-562-1682</p> <p>DOE Project Officer: Katherine Foote E-mail: katherine.foote@ee.doe.gov Phone: 240-562-1635</p> <p>Recipient Business Officer: Dave Wesely E-mail: david.wesely@nebraska.gov Phone: 402-471-3350</p> <p>Recipient Principal Investigator: Thomas Tabor E-mail: tom.tabor@nebraska.gov Phone: 402-471-3682</p> <p>"Electronic signature or signatures as used in this document means a method of signing an electronic message that-- (A) Identifies and authenticates a particular person as the source of the electronic message; (B) Indicates such person's approval of the information contained in the electronic message; and, (C) Submission via FedConnect constitutes electronically signed documents." ASAP: YES Extent Competed: NOT AVAIL FOR COMP Davis-Bacon Act: NO PI: Tabor, Thomas</p>				

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0007933		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address State of Nebraska PO Box 95085 Lincoln, NE 685095805		4. Program/Project Start Date 07/01/2020	5. Completion Date 06/30/2021

SECTION A - BUDGET SUMMARY

Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. Federal	81.042	\$ 0.00		\$ 3,159,918.00		\$ 3,159,918.00
2. STATE			\$ 0.00		\$ 0.00	\$ 0.00
3. STRIPPER			\$ 0.00		\$ 0.00	\$ 0.00
4.						
5. TOTAL		\$ 0.00	\$ 0.00	\$ 3,159,918.00	\$ 0.00	\$ 3,159,918.00

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) GRANTEE ADMINISTR ATION	(2) SUBGRANTE E ADMINISTR ATION	(3) GRANTEE T&TA	(4) SUBGRANTE E T&TA	
a. Personnel	\$ 102,478.00	\$ 0.00	\$ 252,050.00	\$ 0.00	\$ 354,528.00
b. Fringe Benefits	\$ 31,768.00	\$ 0.00	\$ 78,136.00	\$ 0.00	\$ 109,904.00
c. Travel	\$ 0.00	\$ 0.00	\$ 32,700.00	\$ 0.00	\$ 32,700.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 600.00	\$ 0.00	\$ 8,000.00	\$ 0.00	\$ 8,600.00
f. Contract	\$ 0.00	\$ 246,215.00	\$ 40,000.00	\$ 114,047.00	\$ 2,585,736.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 23,150.00	\$ 0.00	\$ 45,300.00	\$ 0.00	\$ 68,450.00
i. Total Direct Charges	\$ 157,996.00	\$ 246,215.00	\$ 456,186.00	\$ 114,047.00	\$ 3,159,918.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
k. Totals	\$ 157,996.00	\$ 246,215.00	\$ 456,186.00	\$ 114,047.00	\$ 3,159,918.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0007933		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address State of Nebraska PO Box 95085 Lincoln, NE 685095805	4. Program/Project Start Date 07/01/2020		
	5. Completion Date 06/30/2021		

SECTION A - BUDGET SUMMARY						
Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1.						
2.						
3.						
4.						
5. TOTAL		\$ 0.00	\$ 0.00	\$ 3,159,918.00	\$ 0.00	\$ 3,159,918.00

SECTION B - BUDGET CATEGORIES					
6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) PROGRAM OPERATIONS	(2) HEALTH AND SAFETY	(3) LIABILITY INSURANCE	(4) FINANCIAL AUDITS	
a. Personnel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 354,528.00
b. Fringe Benefits	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 109,904.00
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 32,700.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 8,600.00
f. Contract	\$ 1,851,392.00	\$ 296,625.00	\$ 25,457.00	\$ 12,000.00	\$ 2,585,736.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 68,450.00
i. Total Direct Charges	\$ 1,851,392.00	\$ 296,625.00	\$ 25,457.00	\$ 12,000.00	\$ 3,159,918.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
k. Totals	\$ 1,851,392.00	\$ 296,625.00	\$ 25,457.00	\$ 12,000.00	\$ 3,159,918.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

**U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
WEATHERIZATION ANNUAL FILE WORKSHEET**

(Grant Number: EE0007933, State: NE, Program Year: 2020)

IV.1 Subgrantees

Subgrantee (City)	Planned Funds/Units
Blue Valley Community Action (Fairbury)	\$218,548.00 20
Central Nebraska Community Services (Loup City)	\$335,826.00 32
Community Action Partnership of Mid-Nebraska (Kearney)	\$348,042.00 33
Community Action Program of Lancaster and Saunders Counties (Lincoln)	\$311,393.00 29
Habitat for Humanity of Omaha (Omaha)	\$507,696.00 51
Northeast Nebraska Community Action (Pender)	\$345,599.00 33
Northwest Community Action Partnership (Chadron)	\$272,300.00 25
Southeast Nebraska Community Action Council (Humboldt)	\$206,332.00 19
Total:	\$2,545,736.00 242

IV.2 WAP Production Schedule

Weatherization Plans	Units
Total Units (excluding reweatherized)	218
Reweatherized Units	24

Note: Planned units by quarter or category are no longer required, no information required for persons.

Average Unit Costs, Units subject to DOE Project Rules		
VEHICLE & EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)		
A	Total Vehicles & Equipment (\$5,000 or more) Budget	\$0.00
B	Total Units Weatherized	218
C	Total Units Reweatherized	24
D	Total Dwelling Units to be Weatherized and Reweatherized (B + C)	242
E	Average Vehicles & Equipment Acquisition Cost per Unit (A divided by D)	\$0.00
AVERAGE COST PER DWELLING UNIT (DOE RULES)		
F	Total Funds for Program Operations	\$1,851,392.00
G	Total Dwelling Units to be Weatherized and Reweatherized (from line D)	242
H	Average Program Operations Costs per Unit (F divided by G)	\$7,650.38
I	Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$0.00
J	Total Average Cost per Dwelling (H plus I)	\$7,650.38

IV.3 Energy Savings

Method used to calculate savings: <input checked="" type="checkbox"/> WAP algorithm <input type="checkbox"/> Other (describe below)		
Units	Savings Calculator (MBtus)	Energy Savings

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This Year Estimate	242	29.3	7091
Prior Year Estimate	273	29.3	7999
Prior Year Actual	115	29.3	3370

Method used to calculate savings description:

IV.4 DOE-Funded Leveraging Activities

None

IV.5 Policy Advisory Council Members

Check if an existing state council or commission serves in this category and add name below

Community Action of Nebraska	Type of organization: Non-profit (not a financial institution) Contact Name: Ashley Frevert, Executive Director Phone: 4024713714 Email: ahansen@canhelp.org
Lancaster County Extension Service	Type of organization: Local agency Contact Name: Karen Wobig, Extension Educator Phone: 4024417180 Email: kwobig2@unl.edu
Nebraska Client Assistance Program	Type of organization: Unit of State Government Contact Name: Jerry Bryan, Program Specialist Phone: 4024713412 Email: jerry.bryan@nebraska.gov
Nebraska Department of Economic Development	Type of organization: Unit of State Government Contact Name: Lynn Kohout, Economic Development Consultant Phone: 4024402599 Email: lynn.kohout@nebraska.gov
Nebraska Department of Health & Human Services	Type of organization: Unit of State Government Contact Name: Matt Thomsen Phone: 4024179435 Email: Matt.Thomsen@nebraska.gov
Nebraska Public Power District	Type of organization: Utility Contact Name: Steve Zach, Energy Efficiency Supervisor Phone: (402)563-5472 Email: szach@nppd.com
Ponca Tribe of Nebraska	Type of organization: Indian Tribe Contact Name: Georja Kriebs, Environmental Manager Phone: 4024389222 Email: gkriebs@poncatribes-ne.org
Prairie Gold Homes	Type of organization: Non-profit (not a financial institution) Contact Name: Ken Inness, Production Manager Phone: (402)314-1147 Email: keninness@hotmail.com

IV.6 State Plan Hearings (Note: attach notes and transcripts to the SF-424)

Date Held	Newspapers that publicized the hearings and the dates the notice ran
04/28/2020	A public hearing was held to receive public input on the PY2020 State Plan at 10:00 am Tuesday, April 28, 2020 at the Nebraska Department of Environment and Energy. Notice of the meeting was published in the Omaha World Herald and posted on the Nebraska Department of Environment and Energy's website calendar, and on the Energy and Assistance Division Weatherization Assistance Program website on April 17, 2020. It was distributed via email to all WAP program managers and agency executive directors. There were eight (8) people who attended the Public Hearing and all attendees declared no comment when they were called to announce themselves and make comment during the hearing.

IV.7 Miscellaneous

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
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(Grant Number: EE0007933, State: NE, Program Year: 2020)

Nebraska PY2020 ACSI Action Plan

The Nebraska 2019 ACSI survey identified areas for need of improvement based on either a low score, or because of a significant drop in score from the 2017 ACSI survey. Two focus areas Nebraska will be working to improve over the next PY2020 DOE grant period are partnerships and communication. The Nebraska WAP network has implemented several action items to improve these areas. The first action item the Energy and Assistance Division (EAD) has taken to improve is communication. EAD conducts quarterly meetings with Subgrantees on best practices and technical working group topics. Through these meetings, the network discusses areas of needed improvement and works towards establishing strategies to improve areas that could make the Nebraska WAP more efficient and improve quality. The Nebraska network also meets via conference call or through email when there is an immediate concern that needs to be addressed. Open communication through the Nebraska WAP network to address issues or challenges has provided a better relationship between the state and the Subgrantees to give them more buy-in to the program and feel their issues and challenges are being heard and addressed.

The next area of focus where the EAD scored low on but improved by 10 points is partnerships. Nebraska went from a 34 to a 44 in partnerships. EAD feels that this is still a very low score even though there have been some improvements. EAD has made some improvement in partnerships in Nebraska since the 2017 survey, yet we feel that the 2019 score was still significantly low enough to be one of our focus areas of improvement in 2020. Nebraska will work with our Weatherization Assistance Program network to identify potential partners that possibly have not been considered. EAD will continue to work with the utility service industry to create partnerships that will benefit their programs and ours. Nebraska is already working with Omaha Public Power District (OPPD) to collaborate and use their programs to enhance the Weatherization Assistance Program. We have also opened discussion with two other key utility companies in Nebraska to create partnerships between their companies and our Subgrantees. These are key partnerships in working towards leveraging funds from the utility companies to improve the energy efficiency in homes and provide additional funding to support energy efficiency projects that the Weatherization Assistance Program is unable to do if a measure does not SIR or if it is a deferral that needs some type of repair done prior to using the Weatherization Assistance Program.

Some agencies have found partnerships through other programs that offer funding that can cover rehab (deferral) work that the WAP cannot do. One agency recently was able to secure funds through a regional bank to specifically use for homes that were deferred. One agency recently was able to secure funds through a regional bank to specifically use for homes that were deferred in rural counties in their area. Three other Subgrantee agencies have been able to secure additional funds through the Nebraska Department of Economic Development Trust Fund to use towards rehab work on homes that were deferred.

Nebraska is unique in the fact that we have not been able to access utility funds like some other states have done. Nebraska is a Public owned utility state, which up to recently has not been a resource for leveraging funds. The Energy Office will continue to seek out partnerships to improve the WAP.

Recipient Business Officer: Dave Wesely
David.Wesely@nebraska.gov
(402) 471-3350

Recipient Principal Investigator:
Thomas Tabor
Tom.Tabor@nebraska.gov
(402) 471-3682

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
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(Grant Number: EE0007933, State: NE, Program Year: 2020)

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

V.1 Eligibility

V.1.1 Approach to Determining Client Eligibility

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

Definition of Income Used to Determine Eligibility (Client Eligibility)

In accordance with USDOE Weatherization Program Notice 20-3, effective as of February 13, 2020, Low income will mean that income in relation to family size, which: (1) 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, or (2) is the basis on which cash assistance payments have been paid at any time during the preceding twelve months under Titles IV and XVI of the Social Security Act, or (3) is the basis on which energy assistance payments have been paid under the Low Income Home Energy Assistance Program of 1981 (LIHEAP), provided that such basis is at least 200 percent of the poverty level determined in accordance with the criteria established by the Director of the Office of Management and Budget.

- Subgrantees are reminded that the supporting documentation for applicants applying for weatherization that may be on a waiting list or for other reasons must have their eligibility documentation updated at least annually.

Describe what household eligibility basis will be used in the Program

All dwelling units certified as eligible for services shall be occupied by an income-eligible household family unit with income at or below 200 percent of the poverty level, or "which contains a member who has received cash assistance payments under Title IV or XVI of the Social Security Act or applicable State or local law during the twelve month period preceding the determination of eligibility for weatherization assistance," or which contains a member which has received energy assistance payments under the LIHEAP during the twelve month period preceding the determination of eligibility for weatherization assistance.

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

Subgrantees must request documentation from WAP applicants and verify eligibility status through the Systematic Alien Verification for Entitlements (SAVE) Program. Such documentation can be provided to Nebraska Department of Environment and Energy (NDEE) staff for eligibility verification.

The SAVE Program is a web-based service that helps federal, state and local benefit-issuing agencies, institutions, and licensing agencies determine the immigration status of benefit applicants so only those entitled to benefits receive them.

USDOE has directed grantees to guidance provided by Health and Human Services (HHS) under LIHEAP. This guidance can be found by going to <http://aspe.hhs.gov/hsp/immigration/restrictions-sum.shtml>. The Energy Office registered for the SAVE Program to verify qualified alien status of Weatherization Program applicants for sub-grantees. Sub-grantees submit the required information to the NDEE who completes the verification process. The verification documentation is required as part of the Subgrantee Client Files.

The income of all household members, regardless of eligibility, must be documented, verified, and included in the calculation of the benefit amount. Section 2603(5) of the LIHEAP Act (42 U.S.C. §8622(5)) defines "household" as: "any individual or group of individuals who are living together as one economic unit for whom residential energy is customarily purchased in common or who make undesignated payments for energy in the form of rent." Unless individual members of the household can demonstrate that they purchase energy independently, e.g., by signing individual leases, there is no authority to exclude their income. Ineligible household members must be excluded from the total household count when establishing household eligibility. Only eligible household members should be included in the total household count while the income from all household members (including ineligible members) is included in the household income calculation.

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

Subgrantees are required to keep documentation in each client file for review during Program Compliance and Onsite Project monitoring visits by NDEE WAP

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WEATHERIZATION ASSISTANCE PROGRAM (WAP)
STATE PLAN/MASTER FILE WORKSHEET

(Grant Number: EE0007933, State: NE, Program Year: 2020)

staff. A minimum of 20 client files will be reviewed at each Subgrantee during Program Compliance monitoring to assess compliance with this requirement.

Describe Reweathering compliance

Homes weatherized on or before September 30, 1994 are eligible for reweatherization 42 USC 6865(c)(2). If a previously weatherized dwelling unit has been damaged by fire, flood, natural catastrophic weather or environmental occurrence, weatherization crews may return to a unit reported as a completion without regard to date of weatherization. 10 CFR 440.18(f)(2)(ii). Local authorities must deem the dwelling unit(s) salvageable as well as habitable and if the damage to the materials is not covered by insurance or other form of compensation. The use of USDOE WAP funds is limited to eligible weatherization activities and the purchase and delivery of weatherization materials (WPN 16-7). No more than ten (10) percent of a Subgrantee's USDOE completions may be reweatherized without prior approval from the Nebraska Department of Environment and Energy.

DOE issued WPN 12-7 to address Disaster Planning and Relief, which provides a framework for reweatherization of homes on or after September 30, 1994 or later due to natural disaster. Please refer to WPN 12-7 and follow appropriate procedures if the Grantee wishes to serve homes located in disaster areas.

Addresses of completed weatherized units and dates they were completed are tracked by Subgrantees through the NDEE database system. Each agency references new applications to that database to comply with re-weatherization regulations in 10 CFR 440.18(f)(2)(iii) Allowable expenditures. The NDEE also uses a database to track WAP clients and retains client BCJO files for completed units for ten years. The database is used to cross-reference submitted completed units to already completed units. Subgrantees are also responsible to let the Energy Office know when a unit is a re-weatherized unit.

Describe what structures are eligible for weatherization

Eligible housing types include owner and renter-occupied single-family homes, manufactured (mobile) homes, and multifamily buildings.

Historic Preservation

On March 17, 2010, the NDEE entered into a Programmatic Agreement (PA) with the Nebraska State Historical Preservation Office (NSHPO) and the USDOE. Properties funded under the WAP are considered "undertakings" 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 800, and include rehabilitation, energy efficiency, retrofits, renewables, and weatherization (undertakings). SHPO contact information is available at the following link: <http://www.ncshpo.org/shpodirectory.shtml> click on the State of Nebraska to find the Nebraska SHPO contact information. *Federal Register/Vol. 78, No. 50/Thursday, March 14, 2013/Notices extended PAs from a duration of three years to December 31, 2020.*

Section 110(k) of the NHPA applies to USDOE funded activities. Recipients shall avoid taking any action that results in an adverse effect to historic properties pending compliance with Section 106.

Dwellings that may be weatherized include:

1. Framed Homes
 - a. Single family owner-occupied
 - b. Single family rental
 - c. Multi-family dwellings
2. Manufactured Homes
 - a. Owner-occupied
 - b. Renter-occupied

Priority will be given to the weatherization of single-family or other high energy-consuming dwelling units.

Describe how Rental Units/Multifamily Buildings will be addressed

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Rental units may be weatherized when occupied by an eligible client; and

- The Subgrantee has written permission from the owner or his agent. Such written permission shall be permanently maintained in the file of the client whose unit is weatherized.
- The benefits of weatherization assistance will accrue primarily to low-income tenants.
- Not less than 66 percent (50 percent for duplexes and four-unit buildings) of the dwelling units in the building are occupied by eligible clients or will become occupied by eligible clients within 180 days under a Federal, State, or local program for rehabilitating the building or making similar improvements to the building.
- The Subgrantee must obtain and place in the client file a signed agreement from the landlord (or authorized agent of the landlord) that states that for a minimum of 12 months after weatherization work has been completed on a dwelling, the tenants in that dwelling will not be subjected to rent increases because of the increased value of dwelling units due solely to weatherization assistance provided under this part.
- No undue or excessive enhancement shall occur to the value of the dwelling units.
- In the event of a dispute between the tenant and property owner regarding the issues listed above, the Subgrantee will attempt to resolve the dispute; if that fails, the tenant will be referred to legal aid by the Subgrantee.
- In the case of a vacant rental dwelling, weatherization assistance may be provided if there is assurance that a low-income household will inhabit the dwelling within 180 days of the date the weatherization service was completed.
- Subgrantee has provided copies of the signed Landlord Agreements to the tenants and ensure that documentation is placed in the Subgrantee Client File.

The Nebraska WAP does not file liens or enforce restrictions.

Under 10 CFR 440.18(f)(1): No grant funds awarded under this part shall be used for any of the following purposes; To weatherize a dwelling unit which is designated for acquisition or clearance by a Federal, State or local program within 12 months from the date weatherization of the dwelling unit would be scheduled to be completed.

Multi-family Buildings

The total amount of funds that can be invested in a multi-family project is determined as follows: Multiply the total number of income-eligible units in the multi-family building by the current statewide average cost per unit. The total is the maximum amount of USDOE funding available to weatherize the building. All units in the building can be served and all units should be reported to USDOE. Sub-grantees must submit multi-family projects greater than 24 units to the NEO for review and approval before work begins and costs are incurred. The NEO reviews the proposed project and submits to the USDOE Program Office as per the Multi-Family Review Protocol.

Describe the deferral Process

There are conditions and situations under which a Subgrantee must not or may choose not to weatherize an otherwise eligible dwelling unit. Information for making this determination may become evident during either the eligibility process or during the initial inspection process. The Nebraska WAP Deferral policy is part of the Health & Safety plan found in the Nebraska Weatherization Field Guide and Installation Standards, Section 2 Health & Safety.

V.1.3 Definition of Children

Definition of children (below age): **6**

V.1.4 Approach to Tribal Organizations

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

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

Low-income members of Indian tribes will receive benefits equivalent to the assistance provided to other low-income persons within Nebraska.

V.2 Selection of Areas to Be Served

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STATE PLAN/MASTER FILE WORKSHEET**

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Current service areas are predominantly based upon the historic boundaries of the state CAP agencies. This was done for two reasons. First, Nebraska Subgrantee CAP agencies in general, operate within boundaries that best serve the clients they serve through multiple assistance programs. Second, this approach enables CAPs to use existing outreach structures to recruit eligible clients. However, the State reserves the right to re-designate weatherization service areas during a program year should production of homes or service to eligible clients become deficient in any given service area for the WAP.

The Nebraska Department of Environment and Energy reserves the right to operate, on a temporary basis, the Weatherization Program in the territory of any defunded Subgrantee. This will be done to ensure continued service to an area during the search for a new Subgrantee.

Formula to calculate Subgrantees allocation

Weighted average based on population.

{Population (C)} {200% of Poverty (C)} {Poverty(C)} {Elderly(C)}

0.1 X {Population (S)} + 0.2 X {200% of Poverty (S)} + 0.3 X {Poverty (S)} + 0.4 X {Elderly (S)}

C = County S= State

Subgrantees under the WAP were required to notify the NDEE by January 18, 2020 of their interest in continuing as a service provider for the program year beginning July 1 of that year. At the time of submitting Subgrantee letter of intents to provide weatherization service in their specific counties, they will also submit any changes to: Articles of Incorporation, Mission Statement, key agency personnel, Board of Directors and representation, organizational chart, and proposed staffing levels. The application must also address:

- The organization’s experience, performance and training in weatherization or housing renovation activities;
- The organization’s experience in assisting low income persons in the area to be served; and
- The organization’s capacity to undertake a timely and effective weatherization program.

For PY2020 Subgrantees notification of intent will be the written notification to serve the counties they submitted in their most recent Request for Proposal (RFP) for applications. At the time of the submission of the letter of intent, they will also provide any changes that were submitted in the RFP application that would apply to PY2020.

V.3 Priorities

Eligible clients will receive weatherization assistance in Nebraska according to the following priorities:

1. Persons over 60 years of age;
2. Persons with disabilities;
3. Families with children under 6 years old;
4. High residential energy users; and
5. Households with a high-energy burden.

Subgrantees must serve clients according to date of application submission, by priority, and by county. As a rule, within an individual county, a lower priority client should never be served prior to a higher priority client unless the higher priority client was not available during the available time period. Subgrantees must document irregularities in the selection of clients when a high priority client is not available.

As defined in 10 CFR 440, the term Persons with Disabilities means any individual (1) who is a handicapped individual as defined in section 7(6) of the Rehabilitation Act of 1973, (2) who is under a disability as defined in section 1614(a)(3)(A) or 223(d)(1) of the Social Security Act or in section 102(7) of the Developmental Disabilities Services and Facilities Construction Act, or (3) who is receiving benefits under chapter 11 or 15 of title 38, U.S.C.

As defined in 10 CFR 440.3, high residential energy user means a low-income household whose residential energy expenditures exceed the median level of residential expenditures for all low-income households in the state.

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As defined in 10 CFR 440.3 household with a high-energy burden means a low-income household whose residential energy burden (residential expenditures divided by the annual income of that household times one hundred (100) percent exceeds the median level of energy burden for all low-income households in the state.

Prioritization of Single Family Homes and High Energy Users

Single-family homes remain the primary target of the Nebraska WAP. Subgrantees have been authorized to develop procedures to prioritize client households based on their energy burden.

V.4 Climatic Conditions

Total heating degree-days in Nebraska range from a high of 7151 in the northwestern corner of the State to a low of 5844 in Southeast region of Nebraska. The average heating degree-days have been supplied by the National Oceanic and Atmospheric Administration. Site-specific weather data is used in application of the NEAT audit. The average heating degree-days for each subgrantee are set out below:

Blue Valley Community Action	6,056
Central Nebraska Community Services	7,151
Northeast NE Community Action Partnership	6,643
Community Action Partnership of Lancaster & Saunders Counties	6,056
Community Action Partnership of Mid Nebraska	6,686
Northwest Community Action Partnership	6,775
Southeast NE Community Action Partnership	5,844
Habitat for Humanity of Omaha	6506

V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials

In Program Year 2020, the Nebraska WAP network will utilize the 2018 Retrofitting Nebraska: Standard Work Specifications for Single Family Homes and Manufactured Homes along with the Installation Standards for Single Family and Manufactured Homes that were issued to Subgrantees in May of 2018. Nebraska Department of Environment and Energy informed Subgrantees at that time of the expectations for work quality and adherence to the Field Guide and Installation Standards. NDEE implemented the Nebraska Field Guide and Installation Standards after approval by the Department of Energy in Program Year 2018 and will be in effect for three (3) years as Nebraska's technical guides. The Nebraska Field Guide and Installation Standards manual aligns with the USDOE Standard Work Specifications and are the work quality standards that will meet the technical requirements for the WAP outlined in USDOE WPN 15-4, Section 2 and 10 CFR 440.

Each Subgrantee, by signing their Financial Aid Agreement with NDEE, agrees they understand the expectations of the Nebraska Field Guide and Installation

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Standards, USDOE WPN 15-4, energy audit procedures and 10 CFR 440 including Appendix A. By signing this agreement Subgrantees will also be acknowledging that they will include these expectations within their contract agreements.

The approved Nebraska Field Guide and Installation Standards are available on the NDEE Weatherization website for Subgrantees to provide downloadable Installation Standards to crews and contract vendors. For in-network WAP Directors, Managers or Certified Quality Control Inspectors employees the NDEE provides the Field Guides and Installation Standards in pdf and e-pub format for either iPads or Tablet Readers. All contract vendors must provide their own electronic reader to download the Field Guides & Installation Standards.

Subgrantees must provide a mechanism through their contractual agreements verifying that vendors understand and agree to the terms and usage of the Field Guides and Installation Standards and all USDOE installation requirements.

Field guide types approval dates

Single-Family: 4/22/2019
Manufactured Housing: 4/22/2019
Multi-Family:

V.5.2 Energy Audit Procedures

Audit Procedures and Dates Most Recently Approved by DOE

Audit Procedure: Single-Family Audit Name: NEAT Approval Date: 6/2/2016

Audit Procedure: Manufactured Housing Audit Name: MHEA Approval Date: 6/2/2016
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Audit Procedure: Multi-Family Audit Name: Other (specify) <u>NEAT Audit (For small multi-family buildings of 5-24 individually heated and cooled units) - approved by DOE 6/2/2016</u> Approval Date:
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Comments

Approval of Energy Audit Procedures

On June 2, 2016, NDEE received USDOE approval of its audit procedures for site built and for certain small multifamily buildings using the NEAT and for manufactured homes using the MHEA. Both audit tools are already USDOE approved to calculate savings-to-investment (SIR) ratios. NDEE followed the latest WPN 19-4 guidance to comply with 10 CFR 440 for re-approval.

Nebraska's currently approved Energy Audit procedure expires June 2, 2021. Based on DOE WPN 19-4 requiring Grantees to submit the energy audit information to their DOE Project Officer (PO) at least six months before their previous approval expires NDEE will submit their proposed audit update no later than December 1, 2020. Agency and network technical staff will begin the technical audit review and development of the of the site-built and manufactured housing procedures and protocols as part of the July Technical Working Group (TWG) meeting with additions and modifications being addressed in the October TWG meeting.

Multi-family Energy Audits

Multi-family buildings represent less than 20 percent of the housing stock in Nebraska. The U.S. Department of Energy has indicated that they will rely on the MulTEA, EA-QUIP, REM audit software, HEAT, eQUEST and TREAT audits for these larger, multi-family buildings.

When considering weatherization of a multi-family building of greater than 24 units, Subgrantees must consult the NDEE for Energy Audit and technical assistance before performing weatherization work so that required information can be submitted for USDOE review and approval of these types of weatherization projects.

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V.5.3 Final Inspection

Each Subgrantee is required to perform a final quality control inspection on the weatherized home completed by a Building Performance Institute, Inc. (BPI) Certified Quality Control Inspector before reporting it to the NDEE as a completed home and requesting reimbursement as required in USDOE Federal Regulations 10 CFR 440.16(g). The Quality Control Inspector must certify that work has been completed in accordance with the priority determined by the energy audit procedures required by 10 CFR 440.21.

In PY2020 Subgrantees will be required to meet USDOE WPN 15-4 Quality Work Plan requirements and to meet Quality Control Inspector (QCI) Certification requirements. In PY2020 QCI work must meet or exceed standards specified in the Nebraska Standard Work Specification Field Guide and Installation Standards. Documentation is required to be kept in each client file as evidence that a final inspection has been performed by a Certified QCI. NDEE Program Monitors review client files as part of the Subgrantee monitoring to ensure compliance with this requirement. When a unit has received a QCI by the Subgrantee agency and has been monitored by a NDEE Field Conservation Technical staff, both QCI inspection forms will be included in the client file or building file.

Subgrantee agencies operating with a combined Energy Auditor and QCI will be involved in a higher quality assurance review by NDEE above ten (10) percent of all completed units. Subgrantees operating with separate Energy Auditors and QCIs will have at least five (5) percent of all completed units reviewed.

Subgrantees using one person to perform both the Energy Audit and the QCI are not allowed to utilize that person to perform weatherization work on a dwelling. Subgrantees using one person as Energy Auditor and one person as QCI can allow the Energy Auditor to perform weatherization work on a dwelling, while the QCI is not allowed to perform any weatherization work on a dwelling.

Any Subgrantees utilizing an independent privately contracted QCI will provide documentation of certification of the QCI performing the inspections on completed units and include all QCI inspection forms within the client or building files.

V.6 Weatherization Analysis of Effectiveness

The State of Nebraska is committed to providing the citizens of Nebraska with an effective weatherization program that provides quality and cost effective services. Annually since 2015 NDEE has completed a study detailing the actual energy savings and cost effectiveness of weatherization work completed in Nebraska. The study uses a pre- and post-consumption analysis of randomly selected homes proportionately selected based on population demographics in each Subgrantee region. The results of that study and its methodology continue to be used to provide program feedback regarding the effectiveness of specific weatherization measures, and to assist in identifying training needs or training effectiveness based on energy savings and reduction of energy burden to low-income households.

During the application process the Subgrantees secure a signed Client Consumption Release Form which authorizes the Subgrantees to obtain the consumption records for each household for a 12-month period prior to weatherization (pre-consumption) and for a 12-month period after weatherization (post-consumption). The 30-year normalized client pre- and post-consumption data, based on fuel type, is used to calculate the percentage of energy consumption savings achieved. For the period of July 2017 to June 2018, consumption on 129 homes was evaluated and the data showed an average savings for natural gas at 10.609 percent and an average savings for electricity at 3.196 percent. In comparison to the USDOE National Evaluation results:

- 2008 – 18 percent for gas, and 7 percent for electricity average annual energy savings
- 2010 – 16 percent for gas, and 8 percent for electricity average annual energy savings

The PY 2018 State of Nebraska analysis shows the annual energy and natural gas lower than both the National Evaluation results and the consumption analyses of previous program years which we believe is a result of the full implementation of the ASHRAE 62.2 requirements. Although Nebraska's clients are saving 4-6% less in natural gas and electric cost savings (respectively), in their homes. The Department of Environment and Energy completed a Non-Energy Impact Evaluation on the same 129 homes, based on the DOE Evaluation study completed by Bruce Tonn and Paul Fransisco and a Massachusetts (MA) Study completed by the Massachusetts Energy Efficiency Advisory Council (EEAC), that showed non-energy related cost savings averages to clients of between \$173 and \$244 (per subgrantee) annually. The Department of Environment and Energy has and will continued to provide specific trainings to discuss and respond to these energy cost savings percentages.

Nebraska is in the process of collecting and reviewing data for July 2019 to June 2020 to continue to evaluate the annual energy savings of Subgrantees weatherization work. This monitoring activity will continue to assist the NDEE in evaluating program effectiveness as well as help in identifying technical training needs or the effectiveness of training during that period.

The initial consumption energy savings model study can be found at this website:

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<http://www.neo.ne.gov/publications/PDFs/NEOWXevaluation2016.pdf>

Other Analysis of Effectiveness

The effectiveness of Subgrantee weatherization is also assessed through program technical monitoring activities and the requirement that all dwelling units weatherized in the program have an energy audit completed to measure energy effectiveness and minimum savings to investment ratio of 1.0 or better.

Inconsistencies noted through program monitoring result in actions that increase training and monitoring requirements in an effort to put a Subgrantee on the path to continued improvement.

This year NDEE intends to work with program Subgrantees to establish and begin implementation of core competency requirements for all program personnel at both the state and Subgrantee level. Trainings will be targeted to provide personnel skills, knowledge and ability to perform weatherization program activities effectively.

NDEE will expand monitoring activities of Subgrantees to include the percentage and types of efficiencies/improvement actions required as a result of on-site inspection activities.

V.7 Health and Safety

The average per dwelling expenditure of financial assistance provided under WAP for labor, weatherization materials, and related matters may not exceed \$7,669 statewide in Program Year 2020 (starting July 1, 2020), as per the U.S. Department of Energy's Weatherization Program Notice 20-1. Historically, Nebraska has not limited H&S investment to a per-unit cost, but it has allocated between 15-20 percent of its annual allocations to cover H&S-related expenditures. In PY2020, a per dwelling unit limit for Health and Safety expenditures of \$1,500 has been established, based on historical data. Units may exceed the \$1,500 limit if approved in advance by the Nebraska Department of Environment and Energy on a case-by-case basis.

Please see the USDOE approved Nebraska Weatherization Field Guide and Installation Standards, Section 2 for Nebraska's WAP Health and Safety plan for Single Family Homes and Manufactured Homes. (*Links to be posted on the Energy Office Weatherization website.*)

The Nebraska PY2020 Health and Safety Plan is a separate attachment to this document.

V.8 Program Management

V.8.1 Overview and Organization

The weatherization program is administered by NDEE, a code agency of the State of Nebraska Executive Branch. The NDEE is the Grantee agency for the state of Nebraska for USDOE Formula Grant funding and is a Subawardee of the Nebraska Department of Health & Human Services on USDHHS LIHEAP funding for the weatherization assistance portion of that state funding. The NDEE is the administrator of these two funds that are passed-through to seven (7) Community Action Agencies and one (1) non-profit agency in Nebraska. The seven (7) Community Action Agencies and one (1) non-profit agency accept applications, prioritize clients based on priority level and perform the weatherization work on dwellings.

V.8.2 Administrative Expenditure Limits

10 CFR §440.18(e) permits Subgrantees receiving less than \$350,000 in federally appropriated Low Income WAP funds to receive up to an additional 5% share of administrative funds. The Nebraska Department of Environment and Energy will use this provision in the 2020 Program Year.

V.8.3 Monitoring Activities

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To ensure quality workmanship throughout the State, NDEE implements a comprehensive project and program compliance monitoring strategy in compliance to USDOE’s WPN-16-4: Updated WAP Monitoring Guidance. The WAP Network of Subgrantees provide access to weatherization services in each of the state's ninety-three (93) counties based on the relative need of the low-income population residing in each county and their designated service areas.

Administrative/Fiscal Compliance and Technical Monitoring Personnel

Two Technical Monitors, one Building Program Specialist, one Fiscal Compliance Analyst, and the WAP/SEP Division Chief are responsible for monitoring and evaluating the operation of the WAP program at the Subgrantee level as outlined in the State Plan.

The staff that is responsible for technical monitoring are listed by their position title and percentage of funds associated with administrative or technical monitoring by each person under this award. (This is not a percentage of all awards, such as LIHEAP and USDOE funding, but based on how it is paid as a percentage when working on monitoring activities related to this award.)

NDEE administrative/fiscal personnel:

Weatherization Division Chief: 80% administrative/20% T & TA

Fiscal Compliance Analyst: 30% administrative/70% T & TA

NDEE Technical Monitoring Personnel:

Building Program Specialist: 100% T & TA

Two (2) Energy Conservation Program Coordinators: 100% T & TA

Monitoring consists of visits by NDEE staff to Subgrantees to review program administration and compliance functions as well as onsite visits to inspect weatherized homes. NDEE Fiscal Compliance Analyst performs annual Administrative/ Fiscal Compliance Monitoring including a review of fiscal and administrative systems to assure compliance with all applicable rules and regulations. The NDEE’s two (2) Certified Quality Control Inspectors/Technical Monitors conduct Quality Control Inspection monitoring and technical assistance centered on monthly site visits to work sites and completed weatherized homes during several phases of project implementation.

In PY2020 Technical Monitors will continue to work with Subgrantee crews and contractors to achieve, “100 percent right, 100 percent of the time.” When it is determined that a serious problem and/or deficiency exists that is an immediate threat to the health and safety of a weatherization client, NDEE will issue an Immediate Action Directive to the Subgrantee who must take action to immediately rectify the issue. Inspection reports are sent to Subgrantees outlining all monitoring activities completed as well as recommendations, findings, and any questioned costs. Subgrantees have 30 days to respond and provide documentation that required actions were completed. The Comprehensive Monitoring Strategy includes the following monitoring and program review activities for each Subgrantee:

Nebraska Department of Environment and Energy				
Program Monitoring and Compliance Strategy				
Monitoring/Review Activity	Purpose	Conducted by:	# of Units	Frequency
Onsite Inspection of in-progress units	Provide technical guidance or assistance to Subgrantees on in-progress projects. Includes lead safe monitoring, training, and/or technical assistance.	(2) WAP Technical Monitors/Certified Quality Control Inspectors	10% of all units for each Subgrantee	Monthly or every other month as needed to reach targeted percentage of units per Subgrantee.
Quality Control Inspection	Quality Control Program Inspections including final diagnostic testing, or on-site monitoring of completed units submitted for	(2) WAP Technical Monitors/Certified Quality Control	Minimum of 1 per month per Technical Monitor – 2 per month.	Monthly

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	reimbursement to NEO. Includes client file review and energy audit review.	Inspectors	10% of all units for each Subgrantee.	
On-Site File Review Monitoring	Subgrantee agency office client files	(2) WAP Technical Monitors/Certified Quality Control Inspectors and Fiscal Compliance Analyst	File review for each completed project that receives an onsite inspection and during annual Program Compliance Fiscal Monitoring.	Monthly or every other month to ensure that file review is completed for every unit inspected by a WAP Technical Monitor. Annual during Program Compliance Fiscal Monitoring.
Lead Safe Weatherization	Assure that lead-safe procedures are implemented as required.	WAP Technical Monitors	n/a	At least once per quarter/per sub-grantee and per crew/contractor.
Program Compliance Administrative/ Fiscal Monitoring	Comprehensive review of Subgrantee program administration including a financial review and a systems monitoring.	Fiscal Compliance Analyst	n/a	At least once annually for each Subgrantee.
Desktop Energy Audit Review	Review energy audits submitted with reimbursement requests to ensure the appropriate audit tool is used, input values are appropriate, energy efficiency measures are identified and implemented according to SIR's for appropriate measures.	Building Program Specialist	10% of all completed units	Sampling from Reimbursement Requests

Technical Monitoring:

NDEE implemented on February 1, 2018 a more accountable process to the Technical Monitoring reporting and follow-up procedures. NDEE Technical Monitors have started a process where after they have completed an in-progress monitoring or a QCI monitoring visit, they write-up a report to the Subgrantee identifying any findings, concerns, recommendations, commendations, or best practices, and identify any corrective actions that are required. The report will be reviewed and signed by the NDEE WAP Division Chief and sent to the Subgrantee in 30 days of the monitoring visit. The Subgrantee has 30 days to respond and resolve any corrective actions if needed. NDEE will utilize a tracking spreadsheet and use the NDEE online database to ensure all follow-up on Technical Monitoring has been completed in a timely manner.

Onsite Inspection of In-progress Units

NDEE Technical Monitors that are BPI Certified Quality Control Inspectors make site visits to in-progress weatherized units to provide technical guidance or assistance to Subgrantees and to verify compliance with program installation requirements. Some Subgrantees are monitored each month, while others are monitored more infrequently depending on production and identified needs to address quality and/or health and safety concerns. A minimum of 10 percent of weatherized homes for each Subgrantee will be completed with additional inspections completed if recurring inconsistencies are experienced.

Quality Control Inspection

NDEE Technical Monitors will complete Quality Control Inspections on units submitted for reimbursement to NDEE as per Section 3 of WPN 15-4. These inspections will include, but not be limited to diagnostic testing, client file review and energy audit review. Five (5) percent or greater of all completed units will be inspected for each Subgrantee that utilizes a separate Energy Auditor and Quality Control Inspector. Ten (10) percent or greater of all completed units will

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be inspected for each Subgrantee that utilizes one person to perform both the Energy Auditor and Quality Control Inspections.

File Review Monitoring

NDEE Technical Monitors complete an onsite file review for every weatherized home receiving an In-Progress or Quality Control Inspection.

Lead Safe Weatherization Site Visits

NDEE Technical Monitors make periodic unannounced site visits to homes that are being weatherized to observe that the required lead-safe work practices are being used by crews and contractors. This is an opportunity to clarify and demonstrate best practices related to lead-safe weatherization.

Desktop Energy Audit Review

NDEE Building Program Specialist reviews energy audits that are submitted on ten (10) percent of weatherized home. The audits are reviewed to ensure that the appropriate audit tool is used, input values are in accordance with program requirements (energy efficiency measures identified based on SIR's are implemented), issues and concerns discussed in Technical Working Group or issues associated with NDEE monitoring and being incorporated into the audit process.

Administration/Fiscal Compliance Monitoring:

NDEE believes monitoring is an extremely important aspect of weatherization program management. A successful monitoring program improves Subgrantee operations, identifies problems early enough for corrective action, and promotes quality work. The Nebraska Department of Environment and Energy considers monitoring to be an assessment of Subgrantee performance in fulfilling program objectives.

An Administrative/Fiscal Compliance Monitoring will be conducted annually with each Subgrantee. Administrative/Fiscal Compliance Monitoring consists of an administrative review and a fiscal review. Prior to monitoring the Fiscal Compliance Analyst will review the Subgrantees required annual audit and previous year's Administration and Fiscal Compliance Monitoring to ensure the Subgrantee has resolved any findings from these audits and monitoring.

The financial review will include:

1. A check of the contract files against contract procedures
2. Sample journal entries
3. Inventory reconciliation
4. Cost categories
5. Administrative expenses

The program administration review will include:

1. The outreach support level and client application process
2. Reviewing client files for compliance with all federal and state WAP rules and regulations regarding mandated documentation of: household income, client certification of eligibility, owner/landlord permission for weatherization, rent declaration, fuel release statement, inspection statement, lien/debt statement, a complete Building Check & Job Order form/site-specific audit, complete material cost information, funding source designation, final quality control inspection and client release
3. Client certification and prioritization system
4. Inspection/quality control systems
5. Subcontracting system
6. Review of goals for serving elderly, disabled, and families with Children under 6 years old, high-energy use and high-energy burden
7. Review of procurement systems

A minimum of 20 client files of all USDOE and LIHEAP units completed in the time period being reviewed during the Program Compliance Administrative/Fiscal Monitoring visit will be examined. NDEE staff will review Subgrantee management systems to ensure compliance with rules, regulations, and mandated file documentation. Material records will be examined and inventory will be inspected to verify the adherence to Federal specifications. The financial review will encompass the examination of all completed programs not previously reviewed.

NDEE will issue a report within thirty (30) calendar days to the Weatherization Program Director, Agency Executive Director and the Board President detailing the monitoring findings along with recommendations for Subgrantee improvement. The Subgrantee is required to respond within thirty (30) calendar days with a corrective action plan that includes steps to be taken to address findings identified during the onsite monitoring. NDEE Program Monitors and staff will follow-up during onsite visits to ensure that the corrective actions are implemented as directed.

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Administrative/Fiscal Monitoring for PY2020:

Blue Valley Community Action

April 26– April 30, 2021

Central Nebraska Community Action Partnership

August 24 - 28, 2020

Northeast Nebraska Community Action Partner

November 2 - 6, 2020

Community Action Partnership of Lancaster and Saunders Counties

May 24 - 28, 2021

Community Action Partnership of Mid Nebraska

june 7 - 11, 2021

Northwest Community Action Partnership

October 5 – 9, 2020

Southeast Nebraska Community Action Partnership

February 22 – 26, 2021

Habitat for Humanity of Omaha

March 22 – 26, 2021

Resolution Strategy

NDEE issues administrative/fiscal compliance monitoring reports to the Subgrantee Weatherization Program Director, Agency Executive Director and the Board President detailing the monitoring findings within thirty (30) calendar days after the monitoring visit along with recommendations for Subgrantee improvement. The Subgrantee is required to respond within thirty (30) calendar days with a corrective action plan that includes steps to be taken to address findings identified during the onsite monitoring. NDEE Administrative and Fiscal Compliance Monitor and staff will follow-up during onsite visits to ensure that the corrective actions are implemented as directed.

V.8.4 Training and Technical Assistance Approach and Activities

NDEE believes strong internal systems, oversight, training and technical assistance are essential to enable Subgrantees to achieve the objectives of the Weatherization Program. The Training and Technical Assistance budget and narrative contained in the Annual File reflects this philosophy and will insure quality weatherization work and adequate financial and programmatic management controls.

NDEE combines onsite inspections on in-progress units with an extensive training and technical assistance program. Administrative, fiscal and technical monitoring identify areas where more specific training is required to improve work quality and delivery of program services and to correct Subgrantee administrative and management problems.

Technical Assistance

WAP Technical Monitors are responsible for completing inspections and providing technical assistance activities as part of the Program Monitoring and Compliance Strategy. Technical assistance provided may include but is not limited to: staff training, policy interpretation, State Plan and Field Guide &

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Installation Standards clarification, working with Subgrantees to address deficiencies and training Subgrantees on new and existing weatherization techniques.

NDEE Staff Training

Training is essential for staff development and is provided on an ongoing basis to upgrade the quality of service delivered by the WAP Technical Monitors. Each monitor is expected to research and attend training opportunities offered through the Nebraska WAP Training Network, which will enable them to gain additional knowledge and skills in: weatherization technology, furnace technology and diagnostic equipment.

Lead Safe Weatherization Training

Lead safe weatherization training will be offered through the Nebraska WAP Training Network during the 2020 Program Year. NDEE will continue to ensure that WAP Network staff and crews receive training and ongoing technical assistance regarding Lead-Safe Weatherization work practices through the WAP Training Network and through monthly site visits to observe Lead Safe Weatherization practices of crews and contractors.

State Technical Working Group

Technical staff personnel from each Subgrantee will attend quarterly Technical Working Group meetings with Energy Office technical staff to discuss technical issues, specific problems, innovative solutions, and program direction. The Technical Working Group will continue to meet on a quarterly basis in PY2020, and will communicate regularly on an as needed basis through email or by conference call.

Nebraska's WAP Training Network

In PY2020 NDEE will contract with Laborers International Union of North America Local #1140 (LIUNA) located in Omaha, NE an IREC Accredited Training site for Retrofit Installer/Technician (RIT) and Crew Chief training, to ensure a continuation of our established training network strategy, and assuring training availability throughout the State employing the WAP Standardized Curriculum aligned with the National Worker Certification Job Task Analysis (JTA), supplemented with a series of in-depth topical trainings identified as needed during the Program Year. LIUNA will provide Comprehensive Training in the areas of Installer Fundamentals, Installer Intermediate and Crew Chief.

As a result of previous years training opportunities, the Nebraska WAP network at this time has a Certified Quality Control Inspector at each CAP and the non-profit agency in Nebraska and the majority of CAPs have an experienced Energy Auditor (some BPI Certified) on staff. Any additional required Energy Auditor and Quality Control Inspector training will be outsourced where the Nebraska WAP network can receive quality training and testing by an IREC Accredited Program with BPI Certified Trainers and Testers where Certification in these areas can be provided. The low demand for the Energy Auditor and Quality Control Inspector training in Nebraska makes it more feasible to outsource this training at this time and allow LIUNA to focus on training opportunities specifically associated with the Installer Fundamentals, Installer Intermediate and Crew Chief JTAs utilizing LIUNA's training facility.

In PY2019, Nebraska WAP Subgrantee staff will prioritize USDOE T & TA funds for training and certification requirements.

Subgrantee technical staff: Comprehensive Training by an IREC Accredited Program will be delivered at the LIUNA site in Omaha, Nebraska. The delivery of Comprehensive Training, based on the amount of funds allocated for training and technical assistance activities from the USDOE, it is anticipated that the schedule will be as follows:

Comprehensive Training	
Class	Anticipated Class Date
Installer Fundamentals	1st Quarter: July – September 2020
Installer Intermediate	2nd Quarter: October – December 2020
Crew Chief	3rd Quarter: January – March 2021
Installer Fundamentals	4th Quarter: April – June 2021
Energy Auditor	Outsourced per CAPs - as needed basis
Quality Control Inspector	Outsourced per CAPs - as needed basis

IREC accredited training has been provided at the Omaha, NE site by Santa Fe Community College, a USDOE and IREC approved and accredited organization. However, some Subgrantee and NDEE staff members have utilized other out-of-state accredited trainers due to training schedule conflicts. . In PY2020 NDEE will continue to provide training at the Omaha facility as needed through training contracts with SFCC or other IREC Accredited/BPI Trained Programs from out of state as needed.

Subgrantee technical staff: Specific Training will continue to be delivered through the LIUNA site-based center in Omaha, Nebraska or other facilities based on training type and needs. The delivery of Specific Training, based on the amount of funds allocated for training and technical assistance activities from the USDOE, will be scheduled as needed and may include, but not be limited to, the following:

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Anticipated Specific Trainings
Lead Safe Weatherization
Mobile Home Weatherization
CAZ Testing
Mold and Moisture Assessment and Evaluation
ASHRAE 62.2
Blower door guided air sealing
Installing and testing dense pack insulation
HVAC inspection and testing
Conference Trainings (for CEUs)

In the case of both Comprehensive and Specific Training, opportunities will be available for a fee to individuals and organizations that are not members of the Nebraska WAP Network.

Grantee Training Plan Feedback

The training schedule discussed above reflects the guidelines established in Section 4 of WPN 15-4 regarding Comprehensive training requirements. Additionally, through the Specific section of the training plan, specific training needs will be addressed as identified during inspections and monitoring completed by NDEE Technical Monitors, the Building Program Specialist, Fiscal Compliance Analyst, WAP Division Chief and USDOE Project Officers and Quality Assurances Reviewers.

Grantee Maintaining Workforce Training and Credentials

NDEE has maintained spreadsheets that track all attendees of trainings that have been provided through the Nebraska WAP network since 2010. An additional spreadsheet has been developed to track all Nebraska WAP network staff members who have received BPI Certification in any of the four Home Energy Professional Certifications.

NDEE communicates quarterly with Subgrantees regarding their staff training needs, certification updates and possible new hire training requirements.

NDEE staff will continue to update both the training and certification spreadsheets and make modifications that will assist in tracking initial certifications, training, certification maintenance and continuing education requirements.

Grantee Mandatory Trainings

Subgrantee technical staff training will be provided by NDEE through the trainings indicated in the Comprehensive and Specific plans shown above. Additional technical staff training will be provided through attendance at quarterly Technical Working Group meetings discussing technical issues, specific problems being encountered and innovative solutions. A minimum of one technical staff member per Subgrantee will be required to attend the Technical Working Group meetings. Non-compliance in attending a mandatory meeting could result in NDEE withholding funds until the Subgrantee can show an adequate understanding of the materials presented in the missed training.

Subgrantee management and fiscal staff have been provided specific training on the Federal Uniform Administrative Requirement (2 CFR Part 200) on cost principles and audit requirements. Supplemental training that will assist them in administrative and fiscal compliance related to the USDOE WAP will also be considered acceptable costs for T & TA funds.

Subgrantee Staff Certification or Training Requirements

In PY 2020, the Nebraska WAP requires:

- Each Subgrantee to have on staff at least one BPI Certified Quality Control Inspector or a contractor with the required QCI Certifications. Subgrantee replacing or hiring new QCI staff must be certified or have the knowledge, skills and abilities to meet the JTA requirements and to secure their certification within six months of their hire date.
- All existing technical staff must be RRP Certified. Subgrantees replacing or hiring new technical staff must be certified or have the knowledge, skills and abilities to secure their certification within two months of their hire date.
- All existing technical staff must have been trained, or in the case of new hires be trained, in the appropriate training covering the Home Energy Professional Certifications, as developed by BPI, that most closely represents their job duties. Replacement or new hires must receive their training within six months of their hire date.

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NDEE Industry Wide Initiatives and Future Program Requirements

NDEE Training and Technical Assistance plan reflects the current QCI WAP initiative while looking forward to implementing future program requirements that will allow Nebraska's WAP network to meet all four of the BPI Home Energy Professional Certifications. During PY2020 and beyond, the Nebraska WAP will make all training opportunities available, for a fee, to individuals and organizations that are not members of the Nebraska WAP Network.

Effectiveness and Energy Saving Comparisons to Assist in T&TA Activity Development

In PY2017 (July 1, 2017 to June 30, 2018) NDEE evaluated the energy and energy cost savings achieved over 12 months on weatherized homes and its impact on client's energy burden. Initial evaluations were completed on a sampling of homes weatherized by each of the Subgrantees, taking into account home ownership, building type, heating fuel type and geographic location. The results are being used by NDEE in their prioritization and development of T&TA activities, and the development of future Specific training options for Nebraska WAP technical staff. NDEE completed a training session in the October 2018 Technical Working Group utilizing the statewide and per agency energy savings results from the initial evaluation. NDEE is also utilizing the evaluation results to provide NDEE and Subgrantees with valuable information regarding the effectiveness of specific program work and the overall impact of their work within the low-income community. In PY2020 NDEE will proceed with evaluating over a 100 home sample of Subgrantees completed homes using the same evaluation tool to compare PY2019 (July 1, 2019 to June 30, 2020) energy and energy cost savings to PY2018 evaluation data. NDEE will also use results for comparison with previous program year evaluations.

Administrative Requirements to Ensure Effective Program Administration and Implementation

- NDEE Technical Monitors and Building Program Specialist will attend weatherization industry conferences, trainings and workshops to meet QCI recertification requirements and acquiring a minimum of 10 CEUs per year. Information attained as part of those trainings will be shared with members of the Nebraska WAP through various training activities such as the quarterly Technical Working Group meetings and onsite inspections.
- NDEE and Subgrantee management and fiscal staff will attend industry related conferences, trainings, workshops and grant management webinars to increase their knowledge, skills and abilities in grant administration. An example would be continued participation in training and webinars that address grant administration, such as the NASCSP Annual Conference.

Grantee Health and Safety Plan Training Activities

The Specific section of the training plan includes trainings specifically associated with execution of the NDEE Health and Safety Plan including; Lead Safe Weatherization, Combustion Appliance Zone (CAZ) Testing, Mold and Moisture Assessment and Evaluation, and ASHRAE 62.2 Ventilation Requirements. Additional Health and Safety Plan training activities will be addressed as identified during the inspection and monitoring of units.

Approach to Client Education

The educational component has been designed to enhance program participants' understanding of home energy efficiency improvements, to increase energy savings, and to contribute to the ongoing effectiveness of installed weatherization measures. Educational materials have been prepared by NDEE and training provided to our Subgrantees. The USDOE will continue to require WAP Subgrantees to provide client education to each WAP client. Subgrantees will be required to provide (at a minimum) educational materials in verbal and written format.

Subgrantee Training and Technical Assistance

Each Subgrantee will receive an allocation of T & TA funds to help offset the cost of their Comprehensive and Specific training while attending trainings or to provide trainings for their weatherization staff.

Percent of overall trainings

Comprehensive Trainings:	70.0
Specific Trainings:	30.0

Breakdown of T&TA training budget

Percent of budget allocated to Auditor/QCI trainings:	20.0
Percent of budget allocated to Crew/Installer trainings:	60.0
Percent of budget allocated to Management/Financial trainings:	20.0

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V.9 Energy Crisis and Disaster Plan

N/A

2020 Nebraska Health and Safety Plan

POLICY SUBMITTED WITH PLAN

1.0 – GENERAL INFORMATION

Grantees are encouraged to enter additional information here that does not fit neatly in one of the other sections of this document.

The average per dwelling expenditure of financial assistance provided under WAP for labor, weatherization materials, and related matters may not exceed \$7,669 statewide in Program Year 2020 (starting July 1, 2020), as per the U.S. Department of Energy's Weatherization Program Notice 20-1. Historically, Nebraska has not limited H&S investment to a per-unit cost, but it has allocated between 15-20 percent of its annual allocations to cover H&S-related expenditures. In PY2020, a per dwelling unit limit for Health and Safety expenditures of \$1,500 has been established, based on historical data. Units may exceed the \$1,500 limit if approved in advance by the Nebraska Energy Office (NEO) on a case-by-case basis.

Please see the USDOE approved Nebraska Weatherization Field Guide and Installation Standards, Section 2 for Nebraska's WAP Health and Safety plan for Single Family Homes and Manufactured Homes. (Links to be posted on the Energy Office Weatherization website. <http://www.neo.ne.gov/wx/news/wxassist.htm>)

2.0 – BUDGETING

Grantees are encouraged to budget Health & Safety (H&S) costs as a separate category and, thereby, exclude such costs from the average cost per unit cost (ACPU) limitation. This separate category also allows these costs to be isolated from energy efficiency costs in program evaluations. Grantees are reminded that, if H&S costs are budgeted and reported under the program operations category rather than the H&S category, the related H&S costs must be included in the calculation of the ACPU and cost-justified through the approved energy audit.

Select which option is used below.

Separate Health and Safety Budget

Contained in Program Operations

3.0 – HEALTH AND SAFETY EXPENDITURE LIMITS

Pursuant to [10 CFR 440.16\(h\)](#), Grantees must set H&S expenditure limits for their Program, providing justification by explaining the basis for setting these limits and providing related historical experience.

Low percentages should include a statement of what other funding is being used to support H&S costs, while larger percentages will require greater justification and relevant historical support. It is possible that these limits may vary depending upon conditions found in different geographical areas. These limits must be expressed as a percentage of the ACPU. For example, if the ACPU is \$5,000, then an average expenditure of \$750 per dwelling would equal 15 percent expenditures for H&S.

15 percent is not a limit on H&S expenditures but exceeding this amount will require ample justification. These funds are to be expended by the Program in direct weatherization activities. While required as a percentage of the ACPU, if budgeted separately, the H&S costs are not calculated into the per-house limitation. DOE strongly encourages using the table below in developing justification for the requested H&S budget amount. Each H&S measure the Grantee anticipates addressing with H&S funds should be listed along with an associated cost for each measure, and by using historical data the estimated frequency that each measure is installed over the total production for the year.

It is also recommend reviewing recent budget requests, versus expenditures to see if previous budget estimates have been accurate. The resulting "Total Average H&S Cost per Unit" multiplied by the Grantee's production estimate in the Annual File should correlate to the H&S budget amount listed in the Grantee's state plan.

Should a Grantee request to have more than 15 percent of Program Operations used for health and safety purposes, DOE will conduct a secondary level of review. DOE strongly encourages use of this H&S template and matrix to help expedite this process

ASHRAE 62.2 Compliance	\$478.58	57.7%	\$276.03
HVAC and Exhaust Venting	\$602.75	22.2%	\$133.80
HVAC and DSTO Inspections	\$208.48	15.8%	\$32.87
Furnace Replacement	\$3,079.65	11.6%	\$357.79
Furnace Repair	\$404.15	18.5%	\$74.63
Water Heater Replacement	\$1,361.23	8.7%	\$118.62
Water Heater Repair	\$45.73	24.5%	\$11.20
Electrical Repairs	\$82.09	7.1%	\$5.79
CO, Propane and Fire Detectors	\$249.95	33.2%	\$82.97
Lead Safe RRP Work	\$204.93	5.3%	\$10.84
Vapor Barrier Poly and Installation	\$1,325.25	6.2%	\$82.48
High Heat Shielding	\$312.41	6.0%	\$18.80
Minor Health & Safety Repairs	\$1,443.17	1.2%	\$17.97
Radon Sealing Work	\$58.23	3.3%	\$1.93
Total Average H&S Cost Per Unit			\$1,225.72
Enter Estimated Production (Annual File: IV.2 WAP Production Schedule) →			242
Enter Estimated Program Operations Budget →			1,851,392.05
H&S Budget (Total Average H&S Cost Per Unit * Estimated Production)			\$296,624.29
Requested H&S Percentage Per Unit (H&S Budget/Program Operations)			16.0%

4.0 – INCIDENTAL REPAIR MEASURES

If Grantees choose to identify any H&S measures as incidental repair measures (IRMs), they must be implemented as such under the Grantee’s weatherization program in all cases – meaning, they can never be applied to the H&S budget category. In order to be considered IRMs, the measure must fit the following definition and be cost justified along with the associated efficiency measure;

Incidental Repairs means 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 materials installed under this program. ([10 CFR 440 “Definitions”](#))

NEO has set cost limits on incidental repair measures that will allow necessary repairs to improve the effectiveness of performance and preservation of weatherization measures. The cost limits associated with incidental repairs are shown below; additional information regarding the specific topics can be seen in the following sections of this Health & Safety plan.

- 7.5 – Biologicals and Unsanitary Conditions - \$300.00
(odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.)

- 7.6 – Building Structure and Roofing - \$300.00
- 7.9 – Electrical - \$300.00
- 7.14 – Injury Prevention of Occupants and Weatherization Workers \$200.00
(Measures such as repairing stairs and replacing handrails)
- 7.16 – Mold and Moisture \$300.00
(Including but not limited to: drainage, gutters, down spouts, extensions, flashing, sump pumps, dehumidifiers, landscape, vapor retarders, moisture barriers, etc.)
- 7.17 – Pests - \$300.00

5.0 – DEFERRAL/REFERRAL POLICY

Deferral of services may be necessary if H&S issues cannot be adequately addressed according to WPN 17-07 guidance. The decision to defer work in a dwelling is difficult but necessary in some cases. This does not mean that assistance will never be available, but that work must be postponed until the problems can be resolved and/or alternative sources of help are found. If, in the judgment of the auditor, any conditions exist which may endanger the health and/or safety of the workers or occupants, the unit should be deferred until the conditions are corrected. Deferral may also be necessary where occupants are uncooperative, abusive, or threatening. Grantees must be specific in their approach and provide the process for clients to be notified in writing of the deferral and what conditions must be met for weatherization to continue. Grantees must also provide a process for the client to appeal the deferral decision to a higher level in the organization.

Grantee has developed a comprehensive written deferral/referral policy that covers both H&S, and other deferral reasons?

Yes No

Where can this deferral/referral policy be accessed?

Chapter 2 - Health & Safety of the Nebraska Installation Standards for Single Family and Manufactured Housing, approved by USDOE on May 23, 2018, specifies that if a sub-grantee makes a determination that there are circumstances that prevent the weatherization process from proceeding in a home, they are required to:

- Provide information to the client, in writing, describing conditions that must be met in order for weatherization to commence. A copy of this notification must also be placed in the client file and, if possible, refer the client to other service organizations that may be able to assist in solving the problem.
- Provide the client with a completed copy of the Nebraska WAP Weatherization Deferral Notice (Form WX4).
- Clearly indicate in the client file why the dwelling was given “deferral” status.
- Have available a system for a timely and fair administrative hearing of complaints received from clients denied services. An unreasonable delay in acting on an application for assistance will constitute grounds for a hearing.

Additionally, at the time of application, the applicant is given a written notice outlining their rights and the method to file a complaint. All sub-grantees are required to adhere to their agency’s grievance policies. If the grievance cannot be resolved through the subgrantees process, the applicant may file a complaint with the Nebraska Energy Office.

6.0 – HAZARD IDENTIFICATION AND NOTIFICATION FORM(S)

Documentation forms must be developed that include at a minimum: the client's name and address, dates of the audit/assessment and when the client was informed of a potential H&S issue, a clear description of the problem, a statement indicating if, or when weatherization could continue, and the client(s) signature(s) indicating that they understand and have been informed of their rights and options.

Documentation Form(s) have been developed and comply with guidance?

Yes No

The Nebraska Weatherization Assistance Program was developed and utilizes Health & Safety Forms to document, clarify and notify clients of potential numerous types of Health and Safety issues.

Initial information that may give sub-grantees insight to potential Health & Safety issues is provided by the client to the weatherization intake worker and documented on the following forms:

Form WX13 Weatherization Client Questionnaire

<http://www.neo.ne.gov/wx/news/forms/ClientQuestionnaire13.pdf>

Form WX7 Home Health and Safety Screening Questionnaire

<http://www.neo.ne.gov/wx/news/forms/HealthScreening7.pdf>

The following issue specific forms are completed as part of the initial Health and Safety inspection of the home:

Form WX3 Lead Hazard Pre-Renovation Form

<http://www.neo.ne.gov/wx/news/forms/LeadHazard3.pdf> along with providing the client the EPA's Lead; Renovation, Repair and Painting Program (RPP) documentation

Form WX5 Mold Assessment and Release Form

<http://www.neo.ne.gov/wx/news/forms/Mold5.pdf>

The following Forms are completed by sub-grantees with clients to ensure that they understand the information that has been provided to them, ensuring that they have been informed of their rights and options:

Form WX6 Radon Informed Consent/Consent to Perform Work Form

<http://www.neo.ne.gov/wx/news/forms/Radon6.pdf>

Form WX2 Client Education Confirmation of Receipt

<http://www.neo.ne.gov/wx/news/forms/ClientConfirm2.pdf>

The following education pieces are also provided to and discussed with each weatherization client:

Asbestos Fact Sheet

<http://www.neo.ne.gov/wx/news/forms/asbestosfacts.pdf>

EPA's A Citizen's Guide to Radon

Combustion Equipment Safety Fact Sheet

<http://www.neo.ne.gov/wx/news/forms/combustionsafety.pdf>

The following Form is used by sub-grantees (and required in each client file) verifying that each client has received all appropriate Health & Safety documentation:

Form WX8 Health and Safety Checklist

<http://www.neo.ne.gov/wx/news/forms/HealthSafety8.pdf>

When the deferral of a home is required based on Health and Safety concerns the sub-grantee provides the following Form to the client notifying of the issues and what must be remedied to allow weatherization of the home to begin:

Form WX4 Weatherization Deferral Notice

<http://www.neo.ne.gov/wx/news/forms/DeferralNotice4.pdf>

If the sub-grantee makes a determination that there are circumstances that prevent the weatherization process from proceeding, they are required to:

- Provide information to the client, in writing, describing conditions that must be met in order for weatherization to commence. A copy of this notification must also be placed in the client file and, if possible, refer the client to other service organizations that may be able to assist in solving the problem.
- Provide the client with a completed copy of the Nebraska WAP Weatherization Deferral Notice (Form WX4).
- Clearly indicate in the client file why the dwelling was given "deferral" status.

7.0 – HEALTH AND SAFETY CATEGORIES

For each of the following H&S categories identified by DOE:

- Explain whether you concur with existing guidance from WPN 17-07 and how that guidance will be implemented in your Program, if you are proposing an alternative action/allowability, or if the identified category will not be addressed and will always result in deferral. Alternatives must be comprehensively explained and meet the intent of DOE guidance.
- Where an Action/Allowability or Testing is “required” or “not allowed” through WPN 17-07, Grantees must concur, or choose to defer all units where the specific category is encountered.
- “Allowable” items under WPN 17-07 leave room for Grantees to determine if the category, or testing, will be addressed and in what circumstances.
- Declare whether DOE funds or alternate funding source(s) will be used to address the particular category.
- Describe the explicit methods to remedy the specific category.
- Describe what testing protocols (if any) will be used.
- Define minimum thresholds that determine minor and major repairs
- Identify minimum documentation requirements for at-risk occupants
- Discuss what explicit steps will be taken to educate the client, if any, on the specific category if this is not explained elsewhere in the Plan. Some categories, like mold and moisture, require client education.
- Discuss how training and certification requirements will be provided for the specific category. Some categories, like Lead Based Paint, require training.
- Describe how occupant health and safety concerns and conditions will be solicited and documented

Grantees may include additional H&S categories for their particular Programs. Additional categories must include, at a minimum, all of the same data fields as the DOE-provided categories. Two additional tables have been created to utilize.

7.1 – Air Conditioning and Heating Systems

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Air Conditioning Unallowable Measure Heating Unallowable Measure

Funding

DOE LIHEAP State Utility Other

How do you address unsafe or non-functioning primary heating/cooling systems?

- “Red tagged”, inoperable or non-existent *heating system* replacement, repair, or installation **is** an allowable Health & Safety Cost.
- Repair of air conditioning systems **is** an allowable Health & Safety Cost. Replacement or installation of air conditioning systems **is not** an allowable Health & Safety Cost.
 - A maximum \$500 may be spent to repair heat pumps and central air conditioning systems.
 - In renter occupied homes, if the cost to repair the central air conditioner or heat pump exceeds \$500, the owner may repair or replace the unit. However, if the central air conditioner or heat pump is replaced in accordance with the requirements of this Field Guide and Installation Standards, the *Nebraska Weatherization Assistance Program (NeWAP)* may contribute a maximum of \$500 to the replacement cost.
- Unsafe primary units must be repaired, replaced and removed, or rendered inoperable, or deferral is required.

How do you address unsafe or non-functioning secondary heating systems, including unvented secondary space heaters?

- Replacement or installation of secondary units is not allowed.
- Secondary unvented units that conform to the safety standards on ANSI Z21.11.2 may remain as back-up heat sources.
- Units that do not meet ANSI Z21.11.2 **must** be removed, and properly disposed of, prior to weatherization but may remain until a replacement *heating system* is in place.
- Secondary unvented units that conform to the safety standards on ANSI Z21.11.2, but are not operating safely, must be removed and properly disposed of.
- Repair of secondary unvented units is not allowed.
- An unvented gas-liquid-fueled space heater that remains in a completed single-family house after weatherization shall:
 - Not have an input rating in excess of 40,000 Btu/hour;
 - Not be located in, or obtain combustion air from sleeping rooms, bathrooms, toilet rooms, or storage closets, except:
 - One listed wall-mounted space heater in a bathroom if permitted by the authority having jurisdiction which:
 - has an input rating that does not exceed 6,000 Btu/hour;
 - Is equipped with an oxygen-depletion sensing safety shut-off system; and
 - The bathroom has adequate combustion air;
 - One listed wall-mounted space heater in a bedroom if permitted by the authority having jurisdiction which:
 - has an input rating that does not exceed 10,000 Btu/hour;
 - Is equipped with an oxygen-depletion sensing safety shut-off system; and
 - The bathroom has adequate combustion air.

Indicate Documentation Required for At-Risk Occupants

- The State of Nebraska’s annual heating degree day normal, over the forty seven year period from 1970-2018 is 6322, with January average °F high and low temperatures of 35 to 12. Clients in units that contain *heating plants* that are inoperable or red-tagged are in danger of frost bite, hypothermia and other life threatening issues. Therefore, units that contain heating plants that are inoperable or red-tagged at the time of the initial inspection must have the heating plant addressed.
- The replacement or installation of air conditioning is not a Health & Safety measure, therefore no at risk definition is applicable.

Testing Protocols

- Verify that systems are present, operable, and performing correctly.
- Run DOE-approved energy audit to determine if the system can be installed as an energy conservation measure (ECM) prior to replacement as an H&S measure.
- For combustion equipment; inspect chimney and flue and test for Combustion Appliance Zone (CAZ) depressurization.
- For solid fuel appliances; look for visual evidence of soot on the walls, mantel or ceiling or creosote staining near the flue pipe.

Client Education

<ul style="list-style-type: none"> • When deferral is necessary, provide information to the client, in writing, describing conditions that must be met in order for weatherization to commence. A copy of this notification must also be placed in the client file. • Discuss appropriate use and maintenance of units. • Provide all paperwork and manuals for any installed equipment. • Where combustion equipment is present, provide safety information regarding how to recognize depressurization. • When bulk fuel tanks when not removed as part of the weatherization work, discuss and provide information on proper disposal.
Training
<ul style="list-style-type: none"> • WAP H&S policy training on allowable activities. • Licensing and/or certification for HVAC installers as required by authority having jurisdiction (AHJ). • CAZ depressurization test and inspection training.

7.2 - Asbestos - All

What is the blower door testing policy when suspected Asbestos Containing Material (ACM) is identified?

In Siding, walls, ceilings, etc.

- In homes where **friable** suspected ACM siding, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present, blower door testing, using positive pressure techniques, must be completed.
- In homes with asbestos siding, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present and **in good condition**, blower door testing, using either negative or positive pressure techniques, must be completed.

In vermiculite

- If the presence of asbestos has been previously confirmed or if the sub-grantee believes that vermiculite insulation is present, when blower door tests are performed, it must be performed using pressurization instead of depressurization.

On pipes, furnaces, or other small covered surfaces

- In homes where **friable** suspected ACM, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present, blower door testing must not be completed.
- In homes with asbestos, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present, encapsulated and **in good condition**, blower door testing, using either negative or positive pressure techniques, must be completed.

7.2a – Asbestos - in siding, walls, ceilings, etc.

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

How do you address suspected ACM's in siding, walls, or ceilings that will be disturbed through the course of weatherization work?

<ul style="list-style-type: none"> • In homes where <i>friable</i> suspected ACM siding, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present: <ul style="list-style-type: none"> ○ The sub-grantee must take precautionary measures as if it contains asbestos, such as utilizing personal air monitoring. ○ Blower door testing, using positive pressure techniques, must be completed. ○ Wall insulation measure work must be completed from the interior of the home. ○ The costs associated with asbestos testing, abatement or replacement with new siding are not eligible expenditures in the <i>Nebraska Weatherization Assistance Program</i>. • In homes with asbestos siding, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present and in good condition: <ul style="list-style-type: none"> ○ Installing dense-pack insulation from the exterior is allowed. ○ Blower door testing, using either negative or positive pressure techniques, must be completed. • Removal of siding is allowed to perform energy conservation measures; however precautions must be taken not to damage the siding. Asbestos siding should never be cut, sanded or drilled. Where possible, insulate the exterior walls through the interior of the home. Documentation regarding the presence of disturbed asbestos material by an appropriately trained crew leader, auditor or inspector or testing must be maintained in the client file. • Any testing results used to support the installation of ECM associated with the exterior walls of the homes must include appropriate documentation indicating the sample collection and testing was conducted by an Asbestos Hazard Emergency Response Act of 1986 (AHERA) certified tester. A copy of the test results must be included in the client file. • The costs associated with asbestos testing are not eligible expenditures in the <i>Nebraska Weatherization Assistance Program</i>.
Testing Protocols
<ul style="list-style-type: none"> • Visually inspect exterior wall surface and subsurface, floors, walls, and ceilings for suspected ACM prior to drilling or cutting.
Client Education
<ul style="list-style-type: none"> • Inform the client in writing that suspected ACMs are present and what precautions will be taken to ensure the occupants' and workers' safety during weatherization. • Instruct client in writing not to disturb suspected ACM. • Provide asbestos safety information to the client. • When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.
Training and Certification Requirements
<ul style="list-style-type: none"> • Safe practices for siding removal and replacement. • How to identify suspected ACM. • Licensing/certification for removal and reinstallation of asbestos siding if required by AHJ. The costs associated with asbestos abatement, encapsulation or replacement with new siding are not eligible expenditures in the <i>Nebraska Weatherization Assistance Program</i>. • Cost incurred by sub-grantees to comply with asbestos inspection training requirements may be charged to the Health & Safety budget category.

7.2b – Asbestos - in vermiculite		
Concurrence, Alternative, or Deferral		
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>
Funding		

DOE LIHEAP State Utility Other

How do you address suspected ACM's in vermiculite that will be disturbed through the course of weatherization work?

- If the presence of asbestos has been previously confirmed or if the sub-grantee believes that vermiculite insulation is present:
 - The sub-grantee **must** take precautionary measures as if it contains asbestos, such as utilizing personal air monitoring while in attics.
 - When blower door tests are performed, it **must** be performed using pressurization instead of depressurization.
 - Documentation regarding the presence of asbestos material by an appropriately trained crew leader, auditor or inspector or testing **must** be maintained in the client file.
 - The costs associated with vermiculite/asbestos testing is an eligible expenditures in the *Nebraska Weatherization Assistance Program*. Subgrantees are limited to a maximum cost of \$150 for vermiculite testing.
 - The costs associated with vermiculite abatement or encapsulation are **not** eligible expenditures in the *Nebraska Weatherization Assistance Program*.
- Documentation regarding the presence of asbestos material by an appropriately trained crew leader, auditor or inspector or testing **must** be maintained in the client file.
- When deferral is necessary due to asbestos, the home owner/occupant must provide remediation documentation indicating the remediation was completed by an Asbestos Hazard Emergency Response Act of 1986 (AHERA) certified professional, prior to the implementation of the attic insulation ECMs. A copy of the documentation must be included in the client file.

Testing Protocols

- AHERA sample collection and testing must be conducted by a certified tester and is an eligible expenditures in the *Nebraska Weatherization Assistance Program*. Subgrantees are limited to a maximum cost of \$150 for vermiculite testing.
- Cost incurred by sub-grantees to comply with asbestos training requirements may be charged to the Health & Safety budget category.

Client Education

- Inform the client in writing that suspected ACMs are present and what precautions will be taken to ensure the occupants' and workers' safety during weatherization.
- Instruct client in writing not to disturb suspected ACM.
- Provide asbestos safety information to the client.
- Formally notify the client in writing of results, if testing was performed.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

Training and Certification Requirements

- Train on how to recognize vermiculite.
- AHERA or state certification to conduct testing.

7.2c – Asbestos - on pipes, furnaces, other small covered surfaces

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

How do you address suspected ACM's (e.g., pipes, furnaces, other small surfaces) that will be disturbed through the course of weatherization work?
<ul style="list-style-type: none"> • Visual inspections of all surfaces and subsurfaces, piping, and equipment for suspected ACM. • Assume asbestos is present in suspect covering materials. • In homes where <i>friable</i> suspected ACM, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present: <ul style="list-style-type: none"> ○ The sub-grantee must take precautionary measures as if it contains asbestos, such as utilizing personal air monitoring. ○ Blower door testing must not be completed. ○ The costs associated with asbestos testing, abatement or encapsulation not eligible expenditures in the <i>Nebraska Weatherization Assistance Program</i>. • In homes with asbestos, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present, encapsulated and in good condition: <ul style="list-style-type: none"> ○ Weatherization work may continue. ○ Blower door testing, using either negative or positive pressure techniques, must be completed. • Documentation regarding the presence of asbestos material by an appropriately trained crew leader, auditor or inspector or testing must be maintained in the client file. • When deferral is necessary due to asbestos, the home owner/occupant must provide remediation documentation indicating the remediation was completed by an Asbestos Hazard Emergency Response Act of 1986 (AHERA) certified professional, prior to weatherization. A copy of the documentation must be included in the client file.
Testing Protocols
<ul style="list-style-type: none"> • Visual inspections of all surfaces and subsurfaces, piping, and equipment for suspected ACM. • AHERA sample testing must be conducted by a certified tester, however sampling, testing, encapsulation and remediation costs are not eligible expenditures in the <i>Nebraska Weatherization Assistance Program</i>. • Cost incurred by sub-grantees to comply with asbestos training requirements may be charged to the Health & Safety budget category.
Client Education
<ul style="list-style-type: none"> • Inform the client in writing that suspected ACMs are present and what precautions will be taken to ensure the occupants' and workers' safety during weatherization. • Instruct client in writing not to disturb suspected ACM. • Provide asbestos safety information to the client. • When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.
Training and Certification Requirements
<ul style="list-style-type: none"> • How to identify suspected ACM. • Cost incurred by sub-grantees to comply with asbestos inspection training requirements may be charged to the Health & Safety budget category.

7.5 – Biologicals and Unsanitary Conditions		
(odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.)		
Concurrence, Alternative, or Deferral		
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>
Unallowable Measure <input type="checkbox"/>		
Funding		

DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
What guidance do you provide Subgrantees for dealing with biological and/or unsanitary conditions in homes slated for weatherization?				
<ul style="list-style-type: none"> Remediation of <i>minor</i> conditions that may lead to or promote biological concerns and unsanitary conditions is allowed. Subgrantees are limited to a maximum cost of \$300 to remediate these <i>minor</i> conditions, although approval to exceed this limitation will be reviewed on a case by case basis by the Nebraska Energy Office <i>prior</i> to any work being implemented. Addressing bacteria, viruses or major biological and/or unsanitary conditions <i>is not</i> an allowable reimbursable cost. Deferral may be necessary in cases where conditions in the home pose a health risk to occupants and/or weatherization workers. 				
Testing Protocols				
<ul style="list-style-type: none"> Sensory inspection. 				
Client Education				
<ul style="list-style-type: none"> Inform client in writing of observed conditions. Provide information on how to maintain a sanitary home. When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence. 				
Training				
<ul style="list-style-type: none"> How to recognize unsafe conditions and when to defer. Safe work practices when encountering such conditions. 				

7.6 – Building Structure and Roofing				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
What guidance do you provide Subgrantees for dealing with structural issues (e.g., roofing, wall, foundation) in homes slated for weatherization?				
<ul style="list-style-type: none"> Building rehabilitation is beyond the scope of the <i>Nebraska Weatherization Assistance Program</i>. 				
How do you define “minor” or allowable structure and roofing repairs, and at what point are repairs considered beyond the scope of weatherization?				
<ul style="list-style-type: none"> When necessary to effectively weatherize the home, subgrantees may make <i>minor</i> repairs to allow for the implementation of weatherization measures. Subgrantees are limited to a maximum cost of \$300 to implement these <i>minor</i> repairs, although approval to exceed this limitation will be reviewed on a case by case basis by the Nebraska Energy Office <i>prior</i> to any work being implement. 				
If priority lists are used, and these repairs are designated as Incidental Repairs, at what point is a site-specific audit required?				
<ul style="list-style-type: none"> Priority Lists are not used. 				
Client Education				
<ul style="list-style-type: none"> Notify client in writing of structurally compromised areas. When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence. 				
Training				

- How to identify structural and roofing issues.

7.7 – Code Compliance				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
What guidance do you provide Subgrantees for dealing with code compliance issues in homes receiving weatherization measures?				
<ul style="list-style-type: none"> • Correction of preexisting code compliance issues is not an allowable unless triggered by weatherization measures being installed in a specific room or area of the home. • It is each sub-grantee’s responsibility to ensure that weatherization-related work conforms with the applicable codes in jurisdictions where the work is being performed. • Follow State and local or AHJ codes while installing weatherization measures, including H&S measures. • Condemned properties and properties where “red tagged” H&S conditions exist that cannot be corrected under this guidance and must be deferred. 				
What specific situations commonly trigger code compliance work requirements for your network? How are they addressed?				
<ul style="list-style-type: none"> • Examples of eligible costs associated with cost-effective Weatherization Measures include, but are not limited to: the installation of fans to provide appropriate ventilation in the home, appropriate disconnect switching and clearance requirements on furnace installations, installation of appropriately sized chimney liner when water heaters are orphaned by a high efficiency furnace installation, etc. Costs associated with the purchase of any required permits are eligible. • The cost of the permits must not be passed onto the client. • When correction of preexisting code compliance issues is triggered and paid for with WAP funds, specific code requirements with reference to the weatherization measure(s) that triggered the code compliance issue must be included in the client file. 				
Client Education				
<ul style="list-style-type: none"> • Inform client in writing of observed code compliance issues when it results in a deferral. • When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence. 				
Training				
<ul style="list-style-type: none"> • How to determine what code compliance may be required. 				

7.8 – Combustion Gases				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
Testing Protocols				

<ul style="list-style-type: none"> • Combustion safety testing is required when combustion appliances are present. • Test naturally drafting appliances for spillage and CO during CAZ depressurization pre- and post-weatherization and before leaving the home on any day when work has been done that could affect draft (e.g. tightening the home, adding exhaust) Include copies of all required CAZ Depressurization Test (WX9) and Daily Safety Test Out (WX10) testing WX forms in client file requirement. • Inspect venting of combustion appliances and confirm adequate clearances. • Run DOE-approved energy audit to determine if the appliance can be justified as an ECM prior to replacement as an H&S measure.
How are crews instructed to handle problems discovered during testing, and what are the specific protocols for addressing hazards that require an immediate response?
<ul style="list-style-type: none"> • Crew leaders and crews are directed to contact their weatherization coordinator or supervisor immediately if during their time on-site: <ul style="list-style-type: none"> ○ The <i>heating plant</i> or other combustion appliance is malfunctioning. ○ Household members exhibit symptoms that could be from carbon monoxide poisoning. Open windows or evacuate the house if necessary. ○ There is a strong odor of heating gas or sewer gas. Open windows or evacuate the house if necessary. ○ Existing conditions have changed in ways that would make proposed work difficult, dangerous or no longer cost-effective.
Client Education
<ul style="list-style-type: none"> • Provide client with combustion safety and hazards information.
Training
<ul style="list-style-type: none"> • How to perform appropriate testing, determine when a building is excessively depressurized, and the difference between air free and as-measured CO. • CO action levels.

7.9 – Electrical				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
What guidance do you provide Subgrantees for dealing with electrical hazards, including knob & tube wiring, in homes slated for weatherization?				

Knob-and-Tube Wiring in Attics:

- The Nebraska State Electrical Board does not permit directly covering knob and tube wiring with insulation.
- In attics where knob-and-tube wiring has been previously covered and it has been determined to be cost-effective to install additional insulation, the insulation work **must** be completed:
 - when it has been determined where the wiring is located,
 - following a determination that it is actually still “active” , and
 - after the wiring has been appropriately covered to prevent direct contact with the insulation and to provide adequate air space (a minimum of 3 ½” clearance) for “cooling” of the wire.
- Appropriate shielding materials for concealing the knob-and-tube wiring **must** include gypsum board (5/8” or thicker), plywood or oriented strand board.
- Once the determination of the wire locations is documented in the client file, the wiring **must** be appropriately shielded to prevent direct contact with the additional insulation and to provide adequate air movement space for cooling of the wire, then insulated.
- In attic areas where knob-and-tube wiring penetrates the plane of the attic and extends up into a side or *knee wall*, a fire resistant baffling **must** be installed around the wire to provide sufficient space for air movement around the wire to provide adequate air space to accommodate the cooling of the wire, then insulated.

Knob-and-Tube Wiring in Sidewalls:

- Knob and tube wiring in sidewalls **must not** be covered by new insulation.
- If knob and tube wiring in walls is covered by existing insulation, additional insulation **must not** be installed.

Overloaded Electrical, Fuses and Splices:

- Serious electrical hazards exist when gross overloads such as over usage, overloaded outlets and/or oversized fuses are present. Should auditors and crews find such existing problems, they should notify the owner and note the problem in the client file. Weatherization measures that involve the installation of new equipment such as air conditioners, heat pumps or electric water heaters can exacerbate previously marginal overload problems to hazardous levels. Rewiring of a home is outside the scope of the weatherization program.
- Wiring splices **must** be enclosed in metal or plastic electrical boxes, fitted with cover plates. Electrical boxes in attics **must** be marked with a flag that is visible above the insulation. *Type-S-Fuses* **must** be sized according to the smallest gauge of wire in the circuit to be protected. The following gauge wire requires the following size fuse:

<u>Wire Gauge</u>	<u>Fuse Size</u>
12 gauge wire	20 amp fuse
14 gauge wire	15 amp fuse

- If no insulation is being installed in a home the existing fuses **must** remain intact. In homes that utilize fuses where attic insulation is being installed the State Electrical Board recommends the use of a licensed electrician for the installation of safety *Type-S-Fuses* as indicated in the National Electrical Code.
- When the H&S of the occupant/worker(s) is at risk, minor repairs may be completed as necessary to allow for the implementation of weatherization measures.
- Evaluate and if necessary provide sufficient over-current protection and damming (if required) prior to insulating building components containing knob and tube wiring, as required by the AHJ.

How do you define “minor” or allowable electrical repairs, and at what point are repairs considered beyond the scope of weatherization?

☐ Subgrantees are limited to a maximum cost of \$300 to implement these <i>minor</i> repairs, although approval to exceed this limitation will be reviewed on a case by case basis by the Nebraska Energy Office <i>prior</i> to any work being implemented.
If priority lists are used, and these repairs are designated as Incidental Repairs, at what point is a site-specific audit required?
☐ Priority Lists are not used.
Client Education
☐ When electrical issues are the cause of a deferral, provide information to client on over-current protection, overloading circuits, and basic electrical safety/risks.
Training
☐ How to identify electrical hazards.
☐ Local (or AHJ) code compliance

7.10 – Formaldehyde, Volatile Organic Compounds (VOCs), Flammable Liquids, and other Air Pollutants				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
What guidance do you provide Subgrantees for dealing with formaldehyde, VOCs, flammable liquids, and other air pollutants identified in homes slated for weatherization?				
<ul style="list-style-type: none"> • Removal of pollutants is allowed and required if they pose a risk to workers. • If pollutants pose a risk to workers and removal cannot be performed or is not allowed by the client the unit <i>must</i> be deferred. • Refer to Hazardous Material Disposal section for more information. 				
Testing Protocols				
<ul style="list-style-type: none"> • Sensory inspection. 				
Client Education				
<ul style="list-style-type: none"> • Inform client in writing of observed hazardous condition and associated risks. • Provide client written materials on safety and proper disposal of household pollutants. • When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence. 				
Training				
<ul style="list-style-type: none"> • How to recognize potential hazards and when removal is necessary. 				

7.11 – Fuel Leaks				
<i>(please indicate specific fuel type if policy differs by type)</i>				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
Remediation Protocols				

<ul style="list-style-type: none"> Notify utility and temporarily halt work when leaks are discovered that are the responsibility of the utility to address.
How do you define allowable fuel leak repairs, and at what point are repairs considered beyond the scope of weatherization?
<ul style="list-style-type: none"> Fuel leaks found on the property, but after (or behind) the meter must be repaired before weatherizing a unit. When a minor gas leak is found on the property, but before (or in front) of the meter, the utility service must be contacted before work can proceed.
Client Education
<ul style="list-style-type: none"> Inform client in writing if fuel leaks are detected.
Training
<ul style="list-style-type: none"> Fuel leak testing.

7.12 – Gas Ovens / Stovetops / Ranges				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
What guidance do you provide Subgrantees for addressing unsafe gas ovens/stoves/ranges in homes slated for weatherization?				
<ul style="list-style-type: none"> Maintenance on or repair gas cooktops and stoves is not allowed. Replacement is not allowed. 				
Testing Protocols				
<ul style="list-style-type: none"> Test gas ovens for CO. Inspect cooking burners and ovens for operability and flame quality. 				
Client Education				
<ul style="list-style-type: none"> Inform client of the importance of using exhaust ventilation when cooking and the importance of keeping burners clean to limit the production of CO. Provide client with combustion safety and hazards information, including the importance of using exhaust ventilation when cooking and the importance of keeping burners clean to limit the production of CO. Provide client with verbal and written information on the use of the CO detector. 				
Training				
<ul style="list-style-type: none"> Testing techniques. CO action levels. 				

7.13 – Hazardous Materials Disposal				
[Lead, Refrigerant, Asbestos, Mercury (including CFLs/fluorescents), etc.]				
<i>(please indicate material where policy differs by material)</i>				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>

Client Education
<ul style="list-style-type: none"> • Inform client in writing of hazards associated with hazardous waste materials being generated/handled in the home.
Training
<ul style="list-style-type: none"> • Appropriate Personal Protective Equipment (PPE) for working with hazardous waste materials. • Disposal requirements and locations. • Health and environmental risks related to hazardous materials.
Disposal Procedures and Documentation Requirements
<ul style="list-style-type: none"> • Hazardous Waste Materials generated in the course of weatherization work shall be disposed of according to local laws, regulations and/or Federal guidelines, as applicable. • Document proper disposal requirements in contract language with responsible party. • Refer to Lead and Asbestos sections for more information on those topics.

7.14 – Injury Prevention of Occupants and Weatherization Workers (Measures such as repairing stairs and replacing handrails)				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
What guidance do you provide Subgrantees regarding allowable injury-related repairs (e.g., stairs, handrails, porch deck board)?				
<ul style="list-style-type: none"> • When necessary to effectively weatherize the home, workers may make <i>minor</i> repairs and installations to allow for the implementation of weatherization measures. 				
How do you define “minor” or allowable injury prevention measures, and at what point are repairs considered beyond the scope of weatherization? Quantify “minor” or allowable injury prevention measures.				
<ul style="list-style-type: none"> • Subgrantees are limited to a maximum cost of \$200 to implement these <i>minor</i> repairs, although approval to exceed this limitation will be reviewed on a case by case basis by the Nebraska Energy Office <i>prior</i> to any work being implemented. 				
Training				
<ul style="list-style-type: none"> • Hazard identification. • Inspecting for dangers that could prevent weatherization. 				

7.15 – Lead Based Paint				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
Safe Work Protocols				

<ul style="list-style-type: none"> • Crews must follow EPA’s Lead; Renovation, Repair and Painting Program (RPP) when working in pre-1978 housing unless testing confirms the work area to be lead free. • Deferral is required when the extent and condition of the lead-based paint in the house would potentially create further H&S hazards, the sub-grantee will inform the client of the of the issues associated with a deferral in the Weatherization Deferral Notice (Form WX4) completed by the Weatherization Representative and signed by the client or building owner. • Only those costs directly associated with the testing and lead safe practices for surfaces directly disturbed during weatherization activities are allowable.
Testing Protocols
<ul style="list-style-type: none"> • Testing to determine the presence of lead in paint that will be disturbed by WAP measure installation is allowed with EPA-approved testing methods. • Testing methods must be economically feasible and justified. • Job site set up and cleaning verification by a Certified Renovator is required. • Grantees must verify that crews are using lead safe work practices during monitoring.
Client Education
<ul style="list-style-type: none"> • Follow pre-renovation education provisions for RRP. • When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence. Provide a Weatherization Deferral Notice (Form WX4) completed by the Weatherization Representative and signed by the client or building owner.
Training and Certification Requirements
<ul style="list-style-type: none"> • All employees and contractors working on pre-1978 homes must receive training to install measures in a lead-safe manner in accordance with SWS and EPA protocols, and installation must be overseen by an EPA Certified Renovator. • Grantee Monitors and Inspectors must be Certified Renovators.
Documentation Requirements
<ul style="list-style-type: none"> • Documentation in the client file must include Certified Renovator certification: any training provided on-site; description of specific actions taken; lead testing and assessment documentation; and, photos of site containment set up. Include the location of photos referenced is not in the file.

7.16 – Mold and Moisture		
(Including but not limited to: drainage, gutters, down spouts, extensions, flashing, sump pumps, dehumidifiers, landscape, vapor retarders, moisture barriers, etc.)		
Concurrence, Alternative, or Deferral		
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>
Funding		
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input type="checkbox"/>
<p>What guidance do you provide Subgrantees for dealing with moisture related issues (e.g., drainage, gutters, down spouts, moisture barriers, dehumidifiers, vapor barrier on bare earth floors) in homes slated for weatherization?</p>		

- Sub-grantees **must** ensure that weatherization work is performed in a manner that does not cause or contribute to mold problems, and when the work is performed properly, may alleviate mold conditions.
- Where severe Mold and Moistures cannot be addressed, deferral is required.
- Mold cleanup is not an allowed H&S cost.
- Surface preparation where weatherization measures are being installed (e.g., cleaning mold off window trim in order to apply caulk) must be charged as part of the ECM, not to the H&S budget category.
- All clothes dryers and exhaust fans **must** be vented to the exterior.
- The NeWAP requires a full ground laid moisture barrier **must** be installed whenever possible in accessible *crawl spaces* and under manufactured and modular homes *except* when one exists or the space has a concrete floor.
 - The moisture barrier **must** be a Class I *vapor retarder*, a minimum of 6 mils thick, extended up the walls and the support columns at least 12 inches and the joints **must** overlap a minimum of 12 inches.
 - In the event the entire floor cannot be covered, all accessible areas **must** receive a moisture barrier.
 - When installing insulated skirting without adequate clearance to install a full ground laid moisture barrier, the moisture barrier **must** extend a minimum of 24 inches beyond the insulation.

How do you define “minor” or allowable moisture-related measures, and at what point is work considered beyond the scope of weatherization?

- **Limited** water damage repairs that can be addresses by weatherization workers are allowed when necessary in order to weatherize the home and to ensure the long-term stability and durability of the measures. Subgrantees are limited to a maximum cost of \$300 to implement these **limited** repairs, although approval to exceed this limitation will be reviewed on a case by case basis by the Nebraska Energy Office **prior** to any work being implemented.
- **Minor** source control work (i.e. correction of moisture and mold creating conditions) is allowed when necessary in order to weatherize the home and to ensure the long-term stability and durability of the measures. Source control is independent of latent damage and related repairs. Subgrantees are limited to a maximum cost of \$300 to implement this **minor** source control work, although approval to exceed this limitation will be reviewed on a case by case basis by the Nebraska Energy Office **prior** to any work being implemented.

Client Education

- Provide client written notification and disclaimer on mold and moisture awareness.
- Provide information on the importance of cleaning and maintaining drainage systems.
- Provide information on proper landscape design and how this impacts site drainage and moisture control.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.
- Sub-grantees **must** include some form of notification or disclaimer to the client upon the discovery of a mold condition. The notification should include what was or will be done to the house that is expected to alleviate the condition and/or that the work performed should not promote new mold growth. The notification **must** be signed by the client and the owner (if the client is a renter) and placed in the client file (Form WX5).
- Inform client of any observed conditions regarding minor drainage issues.
- Provide guidance on the importance of cleaning and maintaining gutters and drainage systems and the impact on mold and moisture issues in the home when the drainage systems are not maintained.

Training
<ul style="list-style-type: none"> • National curriculum on mold and moisture or equivalent. • How to recognize drainage issues.

7.17 – Pests				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
What guidance do you provide Subgrantees for dealing with pests and pest intrusion prevention in homes slated for weatherization?				
<ul style="list-style-type: none"> • Pest removal is allowed only where infestation would prevent weatherization. Subgrantees are limited to a maximum cost of \$300 for pest removal, although approval to exceed this limitation will be reviewed on a case by case basis by the Nebraska Energy Office <i>prior</i> to any work being implemented. • Infestation of pests may be cause for deferral where it cannot be reasonably removed or poses H&S concern for workers. • Screening of windows and points of access, and incorporating pest exclusion into air sealing practices to prevent intrusion is allowed. 				
Define Pest Infestation Thresholds, Beyond Which Weatherization Is Deferred				
<ul style="list-style-type: none"> • Pest removal issues that would exceed the maximum cost of \$300 to remedy must be deferred and information must be provided to the client in writing describing conditions that must be addressed in order for weatherization to commence. 				
Testing Protocols				
<ul style="list-style-type: none"> • Assessment of presence and danger of infestation and risk to worker. 				
Client Education				
<ul style="list-style-type: none"> • Inform client in writing of observed condition and associated risks. • When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence. 				
Training				
<ul style="list-style-type: none"> • How to assess presence and degree of infestation, associated risks, and deferral policy. 				

7.18 – Radon				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
What guidance do you provide Subgrantees around radon?				

<ul style="list-style-type: none"> • Radon mitigation is not an allowable H&S cost. • Clients must sign a radon informed consent/consent to perform work form (Wx6) prior to receiving weatherization services. This form must be kept in the client file. • The following radon precautions will be implemented in all weatherized homes to reduce the possibility of exacerbating any potential radon issues: <ul style="list-style-type: none"> ○ Whenever site conditions permit, cover exposed dirt floors within the pressure/thermal boundary with 6 mil (or greater) polyethylene sheeting, lapped at least 12” and sealed with appropriate sealants at all seams, walls and penetrations. ○ Air seal existing sumps in such a way that water can drain from above and below the sump cover. ○ Seal and caulk visible, accessible penetrations, openings or cracks in below-grade walls and floors that contact the ground with a sealant that meets the requirements of ASTM C920. ○ Other precautions may include, but are not limited to, sealing any observed floor and/or foundations penetrations isolating the basement from the conditioned space, and ensuring crawlspace venting is installed. • The following additional radon precautions will be implemented in all weatherized homes equipped with active radon mitigation systems: <ul style="list-style-type: none"> ○ Verify that the radon vent fan is operating. ○ If a previously installed radon mitigation system is not operating correctly advise the client to consult the system installer of the state radon office.
Testing Protocols
<ul style="list-style-type: none"> • Radon testing is not an allowable cost.
Client Education
<ul style="list-style-type: none"> • Provide all clients EPA’s <i>A Citizen’s Guide to Radon</i> and inform them of radon related risks. • Review with all clients the radon informed consent/consent to perform work form (Wx6). The form must be signed with a copy of the included in the client file prior to receiving weatherization services.
Training and Certification Requirements
<ul style="list-style-type: none"> • Auditors, assessors and inspectors must have knowledge of radon, what it is and how it occurs, including factors that may make radon worse, and precautionary measures that may be helpful. • Workers must be trained in proper vapor retarder installation.
Documentation Requirements
<ul style="list-style-type: none"> • Provide all clients EPA’s <i>A Citizen’s Guide to Radon</i> and inform them of radon related risks. • Provide all clients the radon informed consent/consent to perform work form (Wx6) signed. A copy of the signed form must be included in the client file prior to receiving weatherization services.

7.19 – Safety Devices: Smoke and Carbon Monoxide Alarms, Fire Extinguishers		
Concurrence, Alternative, or Deferral		
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>
Funding		
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input type="checkbox"/>
What is your policy for installation or replacement of the following:		

<p>Smoke Alarms:</p> <ul style="list-style-type: none"> Battery Operated smoke alarms may be installed where alarms are not present or are inoperable. Installation of Smoke Alarms and Carbon Monoxide Detectors, as per manufacturer's instructions, is required on initial inspection of the home. Battery operated or plug-in 110 Volt Detectors, located one per sleeping level and one adjacent to a combustion appliance, are eligible for reimbursement.
<p>Carbon Monoxide Alarms:</p> <ul style="list-style-type: none"> CO detectors must be installed where detectors are not present or are inoperable. Replacement of operable CO Detectors is not an allowable cost. Installation of Smoke Alarms and Carbon Monoxide Detectors, as per manufacturer's instructions, is required on initial inspection of the home. Battery operated or plug-in 110 Volt Detectors, located one per sleeping level and one adjacent to a combustion appliance, are eligible for reimbursement. <p>Propane Gas Detectors:</p> <ul style="list-style-type: none"> Must be installed in homes and manufactured housing on permanent foundations that have propane combustion appliances. The gas detectors must be permanently installed according to the manufacturer's instructions and 110 volts.
<p>Fire Extinguishers:</p> <ul style="list-style-type: none"> The costs associated with providing fire extinguishers are not allowable Health & Safety Costs.
Testing Protocols
<ul style="list-style-type: none"> Check existing smoke alarms for operation. Check for operation of existing CO detectors. Verify operation of installed alarms.
Client Education
<ul style="list-style-type: none"> Provide the client with verbal and written information on the use of smoke detectors and CO detectors. Provide client with combustion safety and hazards information, including the importance of using exhaust ventilation when cooking and the importance of keeping burners clean to limit the production of CO.
Training
<ul style="list-style-type: none"> Where to install smoke alarms and CO detectors. Local code compliance.

7.20 – Occupant Health and Safety Concerns and Conditions				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
What guidance do you provide Subgrantees for soliciting the occupants' health and safety concerns related to components of their homes?				
<ul style="list-style-type: none"> Prior to any on-site inspection work being scheduled in a home, sub-grantee intake personnel will assist clients in completing a Weatherization Client Questionnaire (WX13) as part of the application process. <ul style="list-style-type: none"> The questionnaire provides information on concerns or issues such as non-working furnaces, foundation issues, leaks, debris, pet/pest issues, broken glazing, etc. in the home that impact not only the client's safety but the safety of weatherization workers. The questionnaire will be included in the client file for future reference. 				

What guidance do you provide Subgrantees for determining whether occupants suffer from health conditions that may be negatively affected by the act of weatherizing their home?		
<ul style="list-style-type: none"> • Sub-grantee personnel will interview and assist clients in completing a Health & Safety Home Screening Questionnaire (WX7) as part of the application process. <ul style="list-style-type: none"> o The survey will be included in the client file for future reference. o The Energy Auditor will then review the Questionnaire with the client at the time of the initial assessment. o The information collected during this process will be used in determining the best course of action for weatherization of the home. 		
What guidance do you provide Subgrantees for dealing with potential health concerns when they are identified?		
<ul style="list-style-type: none"> • If it is determined through the Health & Safety Home Screening Questionnaire that someone in the home is sensitive to a product that is intended to be used during the weatherization process, the sensitivity <i>must</i> be documented in the file and, if possible, an alternative product may be used. If no successful alternative is found, the weatherization of the home may proceed without completion of the measure with no impact on weatherization measures with lower <i>SIRs</i>, with prior <i>Nebraska Energy Office approval</i>. • When a client's health is fragile and/or the weatherization activities would constitute a health or safety hazard, the occupants at risk will be required to leave the home during the activities and requested to return at least 1 hour (or a reasonable time as determined by the installers) after installers are scheduled to leave to allow for clean-up and appropriate ventilation of the home. • Weatherization funds cannot be used to relocate clients or reimburse them for such costs incurred as a result of the requirement to leave during the day. If the client is unable to leave the home and the intended work may exacerbate an occupant's health condition, the home may need to be deferred. • Sub-grantees must take all reasonable precautions against performing work on homes that would subject clients to Health & Safety risks. 		
Client Education		
Clients will also receive the following publications and/or documents:		
<ul style="list-style-type: none"> • Health & Safety Home Screening Questionnaire (Form WX7) • Renovate Right (occupants of all buildings built pre-1978) • Lead Hazard Pre-Renovation Form (Form WX3) • A Brief Guide to Mold, Moisture and your Home • Nebraska Mold Assessment and Release Form (Form WX5) • Consumer Product Safety Asbestos Fact Sheet • Nebraska WAP Even More Dollar and Energy Savings Brochure • Weatherization Deferral Notice (Form WX4) • Client Education Confirmation of Receipt (Form WX2) • Radon Informed Consent/Consent to Perform Work (WX6) • EPA's A Citizen's Guide to Radon 		
Documentation Form(s) have been developed and comply with guidance?		Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

7.21 – Ventilation and Indoor Air Quality		
Concurrence, Alternative, or Deferral		
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>
Funding		

DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
Identify the Most Recent Version of ASHRAE 62.2 Implemented (optional: identify Addenda used)				
<ul style="list-style-type: none"> • Install ventilation as required by the last DOE approved ASHRAE 62.2. • Grantees may voluntarily elect to adopt the most recent version of ASHRAE 62.2 as soon as they are prepared to implement the Standard. • If the ASHRAE normative Appendix A is employed and an existing fan is being replaced or upgraded to meet whole-house ventilation requirements, take actions to prevent zonal pressure differences greater than 3 pascals across the closed door, if one exists. • Exhaust fans must be vented to the outdoors, and never into building attics or <i>crawl spaces</i>. They should have tight-fitting <i>backdraft dampers</i>. • Low sone (1.0) fans should be installed to encourage the client to run them longer. 				
Testing and Final Verification Protocols				
<ul style="list-style-type: none"> • ASHRAE 62.2 evaluation to determine required ventilation. • Measure fan flow of existing fans and of installed equipment to verify performance. 				
Client Education				
<ul style="list-style-type: none"> • Provide client with information on function, use, and maintenance (including location of service switch and cleaning instructions) of ventilation system and components. • Provide client with equipment manuals for installed equipment. • Include disclaimer that ASHRAE 62.2 does not account for high polluting sources or guarantee indoor air quality. 				
Training				
<ul style="list-style-type: none"> • ASHRAE 62.2 training, including proper sizing, evaluation of existing and new systems. • If the Grantee opts to adopt a new version of ASHRAE 62.2 then training and technical assistance should be planned to prepare crews to implement the new Standard. 				

7.22 – Window and Door Replacement, Window Guards				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
What guidance do you provide to Subgrantees regarding window and door replacement and window guards?				
<ul style="list-style-type: none"> • Replacement, repair, or installation of Windows, Doors and Window Guards is not an allowable Health & Safety measures through the NeWAP. 				
Testing Protocols				
<ul style="list-style-type: none"> • Not applicable. 				
Client Education				
<ul style="list-style-type: none"> • Provide information on lead risks wherever issues are identified. 				
Training				
<ul style="list-style-type: none"> • Awareness of guidance. 				

7.23 – Worker Safety (OSHA, etc.)				
Concurrence, Alternative, or Deferral				

Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
How do you verify safe work practices? What is your policy for in-progress monitoring?				
<ul style="list-style-type: none"> On-site inspections of in-progress units are completed on 10-15% of all units for each subgrantee. In-progress inspections are completed monthly or every other month as needed to reach targeted percentage of units per subgrantee. 				
Training and Certification Requirements				
<ul style="list-style-type: none"> OSHA-10 hour training is provide as a Specific training to all contractors and installers in the NeWAP network. 				

7.24 – <Add in Topic>				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input type="checkbox"/>	LIHEAP <input type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
Remediation Protocols				
Testing Protocols				
Client Education				
Training				

U.S. DEPARTMENT OF ENERGY
OFFICE OF ENERGY EFFICIENCY AND RENEWABLE ENERGY
NEPA DETERMINATION



RECIPIENT: States and Territories with DOE-executed Signed Historical Preservation Agreements **STATE:** Mult

PROJECT TITLE : Weatherization Assistance Program Fiscal Year 2020 Formula Awards

Funding Opportunity Announcement Number	Procurement Instrument Number	NEPA Control Number	CID Number
WAP-ALRD-2020A	WAP-ALRD-2020A	GFO-WAP-ALRD-2020A	

Based on my review of the information concerning the proposed action, as NEPA Compliance Officer (authorized under DOE Policy 451.1), I have made the following determination:

CX, EA, EIS APPENDIX AND NUMBER:

Description:

- | | |
|--|--|
| A9 Information gathering, analysis, and dissemination | Information gathering (including, but not limited to, literature surveys, inventories, site visits, and audits), data analysis (including, but not limited to, computer modeling), document preparation (including, but not limited to, conceptual design, feasibility studies, and analytical energy supply and demand studies), and information dissemination (including, but not limited to, document publication and distribution, and classroom training and informational programs), but not including site characterization or environmental monitoring. (See also B3.1 of appendix B to this subpart.) |
| A11 Technical advice and assistance to organizations | Technical advice and planning assistance to international, national, state, and local organizations. |
| B1.16 Asbestos removal | Removal of asbestos-containing materials from buildings in accordance with applicable requirements (such as 40 CFR part 61, "National Emission Standards for Hazardous Air Pollutants"; 40 CFR part 763, "Asbestos"; 29 CFR part 1910, subpart I, "Personal Protective Equipment"; and 29 CFR part 1926, "Safety and Health Regulations for Construction"; and appropriate state and local requirements, including certification of removal contractors and technicians). |
| B1.34 Lead-based paint containment, removal, and disposal | Containment, removal, and disposal of lead-based paint in accordance with applicable requirements (such as provisions relating to the certification of removal contractors and technicians at 40 CFR part 745, "Lead-Based Paint Poisoning Prevention In Certain Residential Structures"). |
| B2.2 Building and equipment instrumentation | Installation of, or improvements to, building and equipment instrumentation (including, but not limited to, remote control panels, remote monitoring capability, alarm and surveillance systems, control systems to provide automatic shutdown, fire detection and protection systems, water consumption monitors and flow control systems, announcement and emergency warning systems, criticality and radiation monitors and alarms, and safeguards and security equipment). |
| B3.1 Site characterization and environmental monitoring | Site characterization and environmental monitoring (including, but not limited to, siting, construction, modification, operation, and dismantlement and removal or otherwise proper closure (such as of a well) of characterization and monitoring devices, and siting, construction, and associated operation of a small-scale laboratory building or renovation of a room in an existing building for sample analysis). Such activities would be designed in conformance with applicable requirements and use best management practices to limit the potential effects of any resultant ground disturbance. Covered activities include, but are not limited to, site characterization and environmental monitoring under CERCLA and RCRA. (This class of actions excludes activities in aquatic environments. See B3.16 of this appendix for such activities.) Specific activities include, but are not limited to: (a) Geological, geophysical (such as gravity, magnetic, electrical, seismic, radar, and temperature gradient), geochemical, and engineering surveys and mapping, and the establishment of survey marks. Seismic techniques would not include large-scale reflection or refraction testing; (b) Installation and operation of field instruments (such as stream-gauging stations or flow-measuring devices, telemetry systems, geochemical monitoring tools, and geophysical exploration tools); (c) Drilling of wells for sampling or monitoring of groundwater or the vadose (unsaturated) zone, well logging, and installation of water-level recording devices in wells; (d) Aquifer and underground reservoir response testing; (e) Installation and operation of ambient air monitoring equipment; (f) Sampling and characterization of water, soil, rock, or contaminants (such as drilling using truck- or mobile-scale equipment, and modification, use, and plugging of boreholes); (g) Sampling and characterization of water effluents, air emissions, or solid waste streams; (h) Installation and operation of meteorological towers and associated activities (such as assessment of potential wind energy resources); (i) Sampling of flora or fauna; and (j) Archeological, historic, and cultural resource identification in compliance with 36 CFR part 800 and 43 CFR part 7. |
| B5.1 Actions to conserve | (a) Actions to conserve energy or water, demonstrate potential energy or water conservation, and promote energy efficiency that would not have the potential to cause significant changes in the indoor or outdoor |

energy or water concentrations of potentially harmful substances. These actions may involve financial and technical assistance to individuals (such as builders, owners, consultants, manufacturers, and designers), organizations (such as utilities), and governments (such as state, local, and tribal). Covered actions include, but are not limited to weatherization (such as insulation and replacing windows and doors); programmed lowering of thermostat settings; placement of timers on hot water heaters; installation or replacement of energy efficient lighting, low-flow plumbing fixtures (such as faucets, toilets, and showerheads), heating, ventilation, and air conditioning systems, and appliances; installation of drip-irrigation systems; improvements in generator efficiency and appliance efficiency ratings; efficiency improvements for vehicles and transportation (such as fleet changeout); power storage (such as flywheels and batteries, generally less than 10 megawatt equivalent); transportation management systems (such as traffic signal control systems, car navigation, speed cameras, and automatic plate number recognition); development of energy-efficient manufacturing, industrial, or building practices; and small-scale energy efficiency and conservation research and development and small-scale pilot projects. Covered actions include building renovations or new structures, provided that they occur in a previously disturbed or developed area. Covered actions could involve commercial, residential, agricultural, academic, institutional, or industrial sectors. Covered actions do not include rulemakings, standard-settings, or proposed DOE legislation, except for those actions listed in B5.1(b) of this appendix. (b) Covered actions include rulemakings that establish energy conservation standards for consumer products and industrial equipment, provided that the actions would not: (1) have the potential to cause a significant change in manufacturing infrastructure (such as construction of new manufacturing plants with considerable associated ground disturbance); (2) involve significant unresolved conflicts concerning alternative uses of available resources (such as rare or limited raw materials); (3) have the potential to result in a significant increase in the disposal of materials posing significant risks to human health and the environment (such as RCRA hazardous wastes); or (4) have the potential to cause a significant increase in energy consumption in a state or region.

B5.16 Solar photovoltaic systems The installation, modification, operation, and removal of commercially available solar photovoltaic systems located on a building or other structure (such as rooftop, parking lot or facility, and mounted to signage, lighting, gates, or fences), or if located on land, generally comprising less than 10 acres within a previously disturbed or developed area. Covered actions would be in accordance with applicable requirements (such as local land use and zoning requirements) in the proposed project area and would incorporate appropriate control technologies and best management practices.

B5.17 Solar thermal systems The installation, modification, operation, and removal of commercially available smallscale solar thermal systems (including, but not limited to, solar hot water systems) located on or contiguous to a building, and if located on land, generally comprising less than 10 acres within a previously disturbed or developed area. Covered actions would be in accordance with applicable requirements (such as local land use and zoning requirements) in the proposed project area and would incorporate appropriate control technologies and best management practices.

Rationale for determination:

The U.S. Department of Energy (DOE) administers the Weatherization Assistance Program (WAP) as authorized by Title IV, Energy Conservation and Production Act, as amended. The goal of WAP is to increase the energy efficiency of dwellings owned or occupied by low-income persons, reduce their total residential expenditures, and improve their health and safety. DOE anticipates making approximately 57 formula-based awards under the Fiscal Year 2020 WAP to states, territories, a tribal government, and the District of Columbia (hereinafter "States"). Each home weatherized under WAP would receive approximately \$7,669 as determined by site-specific outcomes of the energy audit process.

This NEPA determination is specific to WAP Recipients with a DOE executed Historic Preservation Programmatic Agreement. WAP Recipients without a DOE executed Historic Preservation Programmatic Agreement have a separate NEPA determination: GFO-WAP-ALRD 2020B.

Allowable activities include:

1. Energy audits including diagnostic testing to determine the scope of weatherization activities at each home.
2. Administrative activities associated with management of the designated Weatherization Office and management of programs and strategies in support of weatherization activities.
3. Development and implementation of training programs and strategies for weatherization efforts, including initial home energy audits, final inspections and client education.
4. Purchase of vehicles and equipment needed for administrative activities, weatherization energy audits, installation of measures indicated below, and quality control inspections.
5. Weatherization activities provided that projects apply the restrictions of each State's DOE executed historic preservation programmatic agreement with their State Historic Preservation Office (SHPO), and are limited to:
 - a. Building Shell Measures:
 - i. Install insulation where needed
 - ii. Perform air sealing

- iii. Repair and replace windows, install window film, awnings and solar screens
 - b. Mechanical Measures
 - i. Clean, tune, repair, or replace heating and/or cooling systems
 - ii. Install duct and heating pipe insulation
 - iii. Repair leaks in heating/cooling ducts
 - iv. Install programmable thermostats
 - v. Repair/replace water heaters
 - vi. Install water heater tank insulation
 - c. Electric and Water Measures
 - i. Install efficient light sources
 - ii. Install low-flow showerheads
 - iii. Replace inefficient refrigerators with energy-efficient models
6. Energy-related health and safety measures (per DOE WAP Guidance WPN 17-7) including:
- a. Combustion appliance safety inspections
 - b. Air quality assessment and limited removal of formaldehyde, volatile organic compounds, flammable liquids, and other air pollutants
 - c. Gas and bulk fuel leak inspections
 - d. Limited testing and/or containment, removal or disposal of lead, asbestos, refrigerant, and mercury, and other materials generated during the course of WAP activities
 - e. Cleaning of mold limited to surface preparation for WAP activities
 - f. Conduct radon testing and precautionary measures, including but not limited to, covering exposed dirt floors with polyethylene sheeting which contains a rating of no more than 0.1 perm, which is sealed and attached at all seams, walls and foundation penetrations
 - g. Inspect and install carbon monoxide and smoke alarms
 - h. Install ventilation as required by the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 62.2-2016 standard, including blower door testing addressing infiltration, ventilation, and exhaust
7. Incidental and necessary energy-related repairs and replacements
- a. Repair/replace damaged windows and doors
 - b. Minor electrical and plumbing repairs
8. Installation of appropriately sized solar photovoltaic (PV) and/or solar hot water heating systems on buildings with 1-4 units, subject to the following restrictions:
- a. PV systems would not exceed 15 kW, and/or solar hot water heating systems would not exceed 200,000 BTU/HR.
 - b. Systems would be roof mounted or attached to a structure. Installation would include attaching the system to the structure and installing necessary electrical connections.
 - c. Any necessary battery storage would be attached to the structure.
 - d. No tree removal would occur.

Activities/projects not listed above, including ground disturbing activities and tree removal, are not included under the ALRD categorical exclusion and are subject to additional NEPA review and approval by DOE. For activities/projects, requiring additional NEPA review, states must complete the environmental questionnaire (EQ-1): <https://www.eere-pmc.energy.gov/NEPA.aspx> and receive notification from DOE that the NEPA review has been completed and approved by the Contracting Officer prior to initiating the project or activities.

All incidental measures relating to hazardous materials identified during the WAP activities would be managed in accordance with applicable federal, state, and local requirements.

NEPA PROVISION

DOE has made a conditional NEPA determination.

The NEPA Determination applies to the following Topic Areas, Budget Periods, and/or tasks:

This NEPA Determination only applies to projects funded by WAP-ALRD-2020 and completed by Recipients that have a DOE executed Historic Preservation Programmatic Agreement, and to projects that fit within the "Allowable activities" listed in the rationale section above.

The NEPA Determination does not apply to the following Topic Area, Budget Periods, and/or tasks:

This NEPA Determination does NOT apply to Recipients that do not have a DOE executed Historic Preservation Programmatic Agreement, and projects that do not fit within the "Allowable activities" listed above.

Include the following condition in the financial assistance agreement:

Activities/projects not listed under "Allowable activities" are subject to additional NEPA review and approval by DOE, whether the intention is to use WAP formula or Petroleum Violation Escrow (PVE) funds to fund the project. For activities/projects, requiring additional NEPA review, states must complete the environmental questionnaire: <https://www.eere-pmc.energy.gov/NEPA.aspx> and receive notification from DOE that the NEPA review has been completed and approved by the Contracting Officer prior to initiating the project or activities.

Some weatherization activities listed under "Allowable activities" are more restrictive than the Categorical Exclusion. The restrictions listed in the "Allowable activities" must be followed.

Recipients shall adhere to the restrictions of their DOE executed PA for historic preservation. Additionally, recipients must adhere to the requirements included in "Term 8. Historic Preservation" included in the Special Terms and Conditions of the financial assistance agreement.

Notes:

Weatherization & Intergovernmental Programs Office - WAP
This NEPA Determination requires a tailored NEPA provision.
NEPA review completed by Diana Heyder, 02/03/20

FOR CATEGORICAL EXCLUSION DETERMINATIONS

The proposed action (or the part of the proposal defined in the Rationale above) fits within a class of actions that is listed in Appendix A or B to 10 CFR Part 1021, Subpart D. To fit within the classes of actions listed in 10 CFR Part 1021, Subpart D, Appendix B, a proposal must be one that would not: (1) threaten a violation of applicable statutory, regulatory, or permit requirements for environment, safety, and health, or similar requirements of DOE or Executive Orders; (2) require siting and construction or major expansion of waste storage, disposal, recovery, or treatment facilities (including incinerators), but the proposal may include categorically excluded waste storage, disposal, recovery, or treatment actions or facilities; (3) disturb hazardous substances, pollutants, contaminants, or CERCLA-excluded petroleum and natural gas products that preexist in the environment such that there would be uncontrolled or unpermitted releases; (4) have the potential to cause significant impacts on environmentally sensitive resources, including, but not limited to, those listed in paragraph B(4) of 10 CFR Part 1021, Subpart D, Appendix B; (5) involve genetically engineered organisms, synthetic biology, governmentally designated noxious weeds, or invasive species, unless the proposed activity would be contained or confined in a manner designed and operated to prevent unauthorized release into the environment and conducted in accordance with applicable requirements, such as those listed in paragraph B(5) of 10 CFR Part 1021, Subpart D, Appendix B.

There are no extraordinary circumstances related to the proposed action that may affect the significance of the environmental effects of the proposal.

The proposed action has not been segmented to meet the definition of a categorical exclusion. This proposal is not connected to other actions with potentially significant impacts (40 CFR 1508.25(a)(1)), is not related to other actions with individually insignificant but cumulatively significant impacts (40 CFR 1508.27(b)(7)), and is not precluded by 40 CFR 1506.1 or 10 CFR 1021.211 concerning limitations on actions during preparation of an environmental impact statement.

A portion of the proposed action is categorically excluded from further NEPA review. The NEPA Provision identifies Topic Areas, Budget Periods, tasks, and/or subtasks that are subject to additional NEPA review.

SIGNATURE OF THIS MEMORANDUM CONSTITUTES A RECORD OF THIS DECISION.

NEPA Compliance Officer Signature: _____

 Electronically Signed By: Casey Strickland
NEPA Compliance Officer

Date: 2/5/2020

FIELD OFFICE MANAGER DETERMINATION

- Field Office Manager review not required
 Field Office Manager review required

BASED ON MY REVIEW I CONCUR WITH THE DETERMINATION OF THE NCO :

Field Office Manager's Signature: _____

Field Office Manager

Date: _____