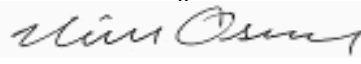


ASSISTANCE AGREEMENT

1. Award No. DE-EE0009929		2. Modification No. 0003	3. Effective Date 07/01/2022	4. CFDA No. 81.042	
5. Awarded To HUMAN SERVICES RI DEPARTMENT Attn: JAMES BESSEL 480 METACOM AVE BRISTOL RI 02809		6. Sponsoring Office State and Community Energy Programs U.S. Department of Energy 1000 Independence Ave, SW Washington DC 20585		7. Period of Performance 07/01/2022 through 06/30/2025	
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. 24SE000842		
11. Remittance Address HUMAN SERVICES RI DEPARTMENT Attn: JAMES BESSEL RI VETERANS HOME 480 METACOM AVE BRISTOL RI 028090689		12. Total Amount Govt. Share: \$4,980,497.00 Cost Share : \$0.00 Total : \$4,980,497.00	13. Funds Obligated This action: \$1,709,781.00 Total : \$4,980,497.00		
14. Principal Investigator	15. Program Manager Rhonda L. Harding-Hill Phone: 240-597-8708		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 See Reporting Checklist	
20. Accounting and Appropriation Data See Schedule					
21. Research Title and/or Description of Project WEATHERIZATION ASSISTANCE PROGRAM - Rhode Island					
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 07/09/2024

CONTINUATION SHEET	REFERENCE NO. OF DOCUMENT BEING CONTINUED	PAGE	OF
	DE-EE0009929/0003	2	3

NAME OF OFFEROR OR CONTRACTOR
HUMAN SERVICES RI DEPARTMENT

ITEM NO. (A)	SUPPLIES/SERVICES (B)	QUANTITY (C)	UNIT (D)	UNIT PRICE (E)	AMOUNT (F)
	<p>DUNS Number: Not Available UEI: DGCZF2EKBSL1</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: 07/01/2024 - 06/30/2025</p> <p>Project Period: Project Period: 07/01/2022 to 06/30/2025</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.</p> <p>The purpose of this action is to obligate Program Year 2024 funds and to authorize performance of Program Year 2024 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 terms and conditions remain unchanged.</p> <p>DOE Award Administrator: Donielle Goldinger E-mail: donielle.golding@ee.doe.gov Phone: 720-498-8391</p> <p>DOE Project Officer: Rhonda Harding-Hill E-mail: rhonda.harding-hill@hq.doe.gov Phone: 240-597-8708</p> <p>Recipient Business Officer: Frederick Sneesby E-mail: frederick.sneesby@dhs.ri.gov Phone: 401-462-1669</p> <p>Recipient Principal Investigator: Julie Capobianco E-mail: julie.capobianco@dhs.ri.gov Phone: 401-462-6420</p> <p>"Electronic signature or signatures as used in this document means a method of signing an electronic message that-</p> <p>(A) Identifies and authenticates a particular person as the source of the electronic message;</p> <p>Continued ...</p>				

CONTINUATION SHEET

REFERENCE NO. OF DOCUMENT BEING CONTINUED
DE-EE0009929/0003

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NAME OF OFFEROR OR CONTRACTOR
HUMAN SERVICES RI DEPARTMENT

ITEM NO. (A)	SUPPLIES/SERVICES (B)	QUANTITY (C)	UNIT (D)	UNIT PRICE (E)	AMOUNT (F)
	(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: Sneesby, Frederick				

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0009929		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address State of Rhode Island 25 Howard Avenue Cranston, RI 029200000		4. Program/Project Start Date 07/01/2024	5. Completion Date 06/30/2025

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. DOE 2024 WAP Formula Funds	81.042	\$ 480,000.00		\$ 1,709,781.00		\$ 2,189,781.00
2.						
3.						
4.						
5. TOTAL		\$ 480,000.00	\$ 0.00	\$ 1,709,781.00	\$ 0.00	\$ 2,189,781.00

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) GRANTEE ADMINISTRATI ON	(2) SUBGRANTEE ADMINISTRATI ON	(3) GRANTEE T&TA	(4) SUBGRANTEE T&TA	
a. Personnel	\$ 66,971.00	\$ 0.00	\$ 43,189.00	\$ 0.00	\$ 110,160.00
b. Fringe Benefits	\$ 25,449.00	\$ 0.00	\$ 14,877.00	\$ 0.00	\$ 40,326.00
c. Travel	\$ 10,500.00	\$ 0.00	\$ 10,500.00	\$ 0.00	\$ 21,000.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 1,350.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 1,350.00
f. Contract	\$ 0.00	\$ 149,413.00	\$ 125,000.00	\$ 102,945.00	\$ 2,014,161.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 2,784.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 2,784.00
i. Total Direct Charges	\$ 107,054.00	\$ 149,413.00	\$ 193,566.00	\$ 102,945.00	\$ 2,189,781.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
k. Totals	\$ 107,054.00	\$ 149,413.00	\$ 193,566.00	\$ 102,945.00	\$ 2,189,781.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0009929		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address State of Rhode Island 25 Howard Avenue Cranston, RI 029200000		4. Program/Project Start Date 07/01/2024	5. Completion Date 06/30/2025

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		\$ 480,000.00	\$ 0.00	\$ 1,709,781.00	\$ 0.00	\$ 2,189,781.00

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	\$ 110,160.00
b. Fringe Benefits	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 40,326.00
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 21,000.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 1,350.00
f. Contract	\$ 1,230,377.00	\$ 130,000.00	\$ 6,000.00	\$ 3,000.00	\$ 2,014,161.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 2,784.00
i. Total Direct Charges	\$ 1,230,377.00	\$ 130,000.00	\$ 6,000.00	\$ 3,000.00	\$ 2,189,781.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
k. Totals	\$ 1,230,377.00	\$ 130,000.00	\$ 6,000.00	\$ 3,000.00	\$ 2,189,781.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0009929		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address State of Rhode Island 25 Howard Avenue Cranston, RI 029200000		4. Program/Project Start Date 07/01/2024	5. Completion Date 06/30/2025

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		\$ 480,000.00	\$ 0.00	\$ 1,709,781.00	\$ 0.00	\$ 2,189,781.00

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) Weatherization Readiness	(2)	(3)	(4)	
a. Personnel	\$ 0.00				\$ 110,160.00
b. Fringe Benefits	\$ 0.00				\$ 40,326.00
c. Travel	\$ 0.00				\$ 21,000.00
d. Equipment	\$ 0.00				\$ 0.00
e. Supplies	\$ 0.00				\$ 1,350.00
f. Contract	\$ 267,426.00				\$ 2,014,161.00
g. Construction	\$ 0.00				\$ 0.00
h. Other Direct Costs	\$ 0.00				\$ 2,784.00
i. Total Direct Charges	\$ 267,426.00				\$ 2,189,781.00
j. Indirect Costs	\$ 0.00				\$ 0.00
k. Totals	\$ 267,426.00				\$ 2,189,781.00
7. Program Income	\$ 0.00				\$ 0.00

U.S. Department of Energy
Weatherization Assistance Program (WAP)
WEATHERIZATION ANNUAL FILE WORKSHEET
Grant Number: EE0009929, State: RI, Program Year: 2024
Recipient: State of Rhode Island

IV.1 Subgrantees

Subgrantee (City)	Planned Funds/Units
Blackstone Valley Community Action Program (Pawtucket)	\$132,241.00 15
Community Action Partnership of Providence County (Providence)	\$245,591.00 18
Comprehensive Community Action Programs (Cranston)	\$736,773.00 59
East Bay Community Action (Riverside)	\$283,374.00 23
Tri-County Community Action (North Providence)	\$245,591.00 18
Westbay Community Action Program (Warwick)	\$245,591.00 18
Total:	\$1,889,161.00 151

IV.2 WAP Production Schedule

Weatherization Plans		Units
Total Units (excluding reweatherized)		151
Reweatherized Units		0
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	151
C	Total Units Reweatherized	0
D	Total Dwelling Units to be Weatherized and Reweatherized (B + C)	151
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	\$1,230,377.00
G	Total Dwelling Units to be Weatherized and Reweatherized (from line D)	151
H	Average Program Operations Costs per Unit (F divided by G)	\$8,148.19
I	Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$0.00
J	Total Average Cost per Dwelling (H plus I)	\$8,148.19

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
	This Year Estimate	151	29.3	4424
	Prior Year Estimate	156	29.3	4571
	Prior Year Actual	77	29.3	2256

Method used to calculate savings description:

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Weatherization Assistance Program (WAP)
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Rhode Island will use the calculation based on the energy savings study conducted by the Oak Ridge National Laboratory to support this figure for projected energy savings (multiplier of 29.3 MBTU).

IV.4 DOE-Funded Leveraging Activities

Rhode Island is not planning to use any DOE funds for our continuing leveraging efforts. This does not mean that we will not continue our efforts and seek additional non-federal funds, only that we will not require DOE funds for this effort. The personnel that will be involved in these leveraging efforts are:

Chief of Program Development: This person serves as Weatherization Assistance Program Manager and is responsible for the preparation of the State Plan/Application and its administration and implementation. The CPD will direct the leveraging portion of the grant, attend all leveraging related meetings and search for new leveraging opportunities. DHS will continue to actively pursue sources of leveraged funds to enhance and support RI WAP.

To the maximum extent practical, DHS will work to coordinate WAP with other federal, state, local, and privately-funded programs in order to improve thermal efficiency, conserve energy and foster healthy housing. Coordination efforts have taken place with LIHEAP, Community Development Block Grant (CDBG), USDA, GHHI and other federally funded programs.

CLEAResult operates as the lead vendor for the RI Energy (formerly National Grid) Income Eligible Services (IES) program. In order to provide the best possible service to our clients, DHS and CLEAResult work collaboratively to deliver weatherization services to eligible Rhode Islanders. The CLEAResult team brings another element of energy efficiency knowledge and expertise to the Rhode Island weatherization program, and both DHS and CLEAResult share many of the same goals for process improvement and enhanced quality assurance. DHS and CLEAResult have also worked collaboratively on the development and updates of RI WAP/IES Operations Manual which will incorporate all applicable elements of WPN 22-4.

RI encourages blending of DOE WAP funds with RI Energy and LIHEAP (HHS WAP) funds. No state funds are used to support RI WAP.

IV.5 Policy Advisory Council Members

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

Energy Efficiency Resource and Management Council	Type of organization: Unit of State Government Contact Name: Steven Chybowski Phone: 4015749117 Email: steven.chybowski@energy.ri.gov
Housing Resources Commission	Type of organization: Unit of State Government Contact Name: Mr. Raymond Neirinckx Phone: 4012224893 Email: raymond.neirinckx@housing.ri.gov
Office of Energy Resources	Type of organization: Unit of State Government Contact Name: Nathan Cleveland Phone: 4015749106 Email: Nathan.Cleveland@energy.ri.gov
Providence Green and Healthy Homes Initiative	Type of organization: Other Contact Name: Bryan Evans Phone: 4438426346 Email: bevans@ghhi.org
Rhode Island Community Action Agency Association	Type of organization: Non-profit (not a financial institution) Contact Name: Paul Salera Phone: 4017324666 Email: psalera@westbaycap.org
Rhode Island Energy	Type of organization: Utility Contact Name: Mr. David MacLellan Phone: 4013511800 Email: david.maclellan@clearesult.com
	Type of organization: Unit of State Government

U.S. Department of Energy
Weatherization Assistance Program (WAP)
WEATHERIZATION ANNUAL FILE WORKSHEET
Grant Number: EE0009929, State: RI, Program Year: 2024
Recipient: State of Rhode Island

Rhode Island Housing	Contact Name: Mr. James Comer Phone: 4014571234 Email: jcomer@rihousing.com
RI Department of Health	Type of organization: Unit of State Government Contact Name: Ms. Bonnie CassaniBrandt Phone: 4012227784 Email: Bonnie.CassaniBrandt@health.ri.gov
RI Department of Health and Human Services	Type of organization: Unit of State Government Contact Name: Mr. Fred Sneesby Phone: 4014621669 Email: Frederick.Sneesby@dhs.ri.gov

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
05/03/2024	The Notice of Public Hearing on the 2024 DOE WAP state plan application was posted on the RI Department of Human Services' website (www.dhs.ri.gov) on 04/22/2024. A copy of the notice has been uploaded to the SF-424. The public hearing file was delivered to DOE outside of PAGE. An audio transcript of the public hearing has been uploaded to a RI designated DOE dropbox. A signed copy of the public hearing transcript has been uploaded to the SF-424. The RI WAP Policy Advisory Council met on 4/24/2024. The notes from the PAC meeting have been uploaded to the SF-424.

IV.7 Miscellaneous

<p>1. Recipient Business Officer and Recipient Principal Investigators</p> <p><u>Recipient Business Officer</u> Mr. Frederick Sneesby Administrator, Children and Family Services Department of Human Services 25 Howard Avenue, Bldg. 57 Cranston, RI 02920 (401) 462-1669 Frederick.Sneesby@dhs.ri.gov</p> <p><u>Recipient Principal Investigator</u> Ms. Julie Capobianco Chief Program Development Weatherization Assistance Program Department of Human Services 25 Howard Avenue, Bldg. 57 Cranston, RI 02920 (401) 462-6420 Julie.Capobianco@dhs.ri.gov</p> <p>2. The allocation requirements and priorities set forth in Section 440.15 (A) have been implemented. DHS ensures that all Weatherization assistance funds are allocated to non-profit corporations operating under Title II of the Economic Opportunity Act of 1964, 42 USC - 2809. The allocation process is based upon negotiation of individual contracts with non-profit corporations. The determining factors are: past performance by Subgrantee, incidence of poverty in the service area covered; number of LIHEAP households assisted in the service area; and the ability of the agency to weatherize homes effectively. In 2024, DHS will assess Subgrantee progress toward completion goals after Quarter 1. If performance is below pre-established production and spending goals, DHS reserves the right to reallocate DOE funding to another RI Subgrantee.</p> <p>3. Per WPN 10-12, RI WAP will comply with Section 106 of 16 USC 470 of the National Historic Preservation Act (NHPA). DHS entered into a Memorandum of Understanding with the Rhode Island Historical Preservation and Heritage Commission (February 2010) relating to the reporting of historic properties and weatherization. In 2015, the MOU was updated and extended. In 2020, this MOU was replaced with a Programmatic Agreement (PA) which has been signed by the Office of Energy Resources, the Department of Human Services, the RI Historic Preservation and Heritage Commission, and the U.S. Department of Energy. All CAP agencies submit addresses for historic review and clearance per the guidelines established by the RI Historical Preservation and Heritage Commission (RIHPHC). Historic Preservation reports are submitted to DOE as required. A copy of the PA has been uploaded to the SF-424.</p>

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Weatherization Assistance Program (WAP)
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Recipient: State of Rhode Island

4. RI Energy and LIHEAP funding continue to be the largest funding sources for WAP. RI WAP received a 15% allocation from LIHEAP in 2024, totaling \$5,125,670 (at the time of the writing of this state plan). LIHEAP funds provide leveraged dollars for RI Energy's Income Eligible Services (IES) program.
5. The Rhode Island PAC met on 04/24/2024 to collectively review and discuss the 2024 RI DOE WAP state plan application. Members were provided a copy of the plan in advance of the meeting, and were also e-mailed the notice of public hearing. A copy of the PAC meeting notes has been uploaded to the SF-424.
6. All six Subgrantees were provided a copy of the draft state plan application as part of an "Interested Parties" email distribution from DHS on 4/22/2024. The Interested Parties notice also included information about the Public Hearing on 5/3/2024. DHS met with Subgrantees to review and discuss the draft 2024 state plan application on 4/29/2024 via Teams.
6. RI has established an average cost per unit for DOE jobs at \$8,148 slightly below the ACPU limit of \$8,497. LIHEAP and RIE funds will be used for leveraging measures not covered with DOE funds, or any measures which may not meet the DOE SIR requirement.
7. The Weatherization Policy Advisory Council is a stand alone PAC, and meets for DOE Weatherization purposes only.
8. Weatherization Readiness: RI has included Weatherization Readiness funding as a separate Budget Category and has issued guidance aligned with WPN 23-4 on use of these funds to Subgrantees. Refer to RIWAP Policy Memo 24-6, copy uploaded to the SF-424. WRF funds will be distributed to Subgrantees based on established funding distribution percentages. DHS will require waiver approval for using WRF funds. DHS has created a separate funding source and WRF measures in Hancock which will allow production and funding reports to be generated from Hancock for tracking and reporting purposes. Subgrantees may also braid LIHEAP and utility funding, as necessary. Wx Readiness Funds are specifically targeted to reduce the frequency of deferred homes that require other services, outside the scope of weatherization, before the weatherization services can commence. Units receiving WRF must result in a DOE completion.
9. In accordance with 2 CFR 200.425(a)(2), only those Subgrantees expending \$750,000 or more in Total Federal Funding (Federal Awards) will receive "FINANCIAL AUDITS" funds identified in DHS SF-424a Budget.
10. Policy Advisory Council (PAC): To the extent possible, Rhode Island's PAC members advocate for and provide a broad representation of "At Risk" and "Low Income" populations such as but not limited to: Children, Elderly, Persons with Disabilities and Native Americans.
11. The PO and Grantee will work diligently to address all Unresolved Action Items prior to grant closeout.
12. Climatic variances affect weatherization. Data regarding 2023 heating degree days for RI (Providence Green State Airport) was obtained from degreedays.net and has been uploaded to the SF-424.

U.S. Department of Energy
Weatherization Assistance Program (WAP)
STATE PLAN / MASTER FILE WORKSHEET
Grant Number: EE0009929, State: RI, Program Year: 2024
Recipient: State of Rhode Island

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

All dwelling units to be weatherized shall be determined eligible in such a manner to ensure that each weatherized unit meets the qualifications of CFR 440.22 - Eligible Dwelling Units.

Rhode Island elects to use LIHEAP income guidelines - 60% of state median income- to determine eligibility for WAP. For families with seven (7) or more in the household, DHS has revised WAP eligibility to be 200% of federal poverty level to meet the requirements of 10 CFR 440.22 and the most recent version of DOE WAP Poverty Income Guidelines and Definition of Income available. All Subgrantees will be provided with this information and have been instructed to refer to PY24 DOE LIHEAP and WAP Income Guidelines, attached to the SF-424.

440.22 Eligible dwelling units. (a) A dwelling unit shall be eligible for weatherization assistance under this part if it is occupied by a family unit: (1) Whose income is at or below 200 percent of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget, (2) 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 at any time during the 12-month period preceding the determination of eligibility for weatherization assistance; or (3) If the State elects, is eligible for assistance under the Low-Income Home Energy Assistance Act of 1981, provided that such basis is at least 200 percent of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget.

According to the RI LIHEAP manual, all Primary Applicants and Household Members shall report income. Income documentation shall represent gross income earned in the most recent three months, except when the document clearly states that the income amount is constant, and also clearly lists the period of the benefit. Income types include: wages, unemployment benefits, fixed income, self-employment, odd jobs, worker's compensation, alimony and child support, interest income, dividends, rental income, support from family and friends, cash prizes and lottery winnings, estate or trust income, or No-Income - Dependent.

Describe what household eligibility basis will be used in the Program

RI WAP elects to use a single application process in conjunction with LIHEAP which is also administered by DHS. Both LIHEAP and WAP use the Hancock Energy Software program. The single application process simplifies the application process for clients and enables Subgrantees to share staff and resources in the certification process. The process also provides consistency for eligibility for all income-eligible weatherization programs including RI Energy's Income Eligible Services (IES) program.

No dwelling unit may be weatherized without documentation that the unit is an eligible dwelling unit. Applications for assistance under this Program will be made through the Weatherization Service Agency (the Subgrantee) who has the responsibility of ensuring that the applicant represents a family unit whose income is at or below minimum income guidelines. Only families with income no higher than the figures listed below may be assisted. Rhode Island elects to use LIHEAP income guidelines - 60% state median income - for the RI Weatherization Assistance Program for households with seven or less. In order to comply with 10 CFR 440.22, households with seven (7) or more will follow a different eligibility threshold - 200% of Poverty Level - using the most recent version of DOE WAP Poverty Income Guidelines and Definition of Income available.

PY24 DOE WAP Income Guidelines

Family Size	(12 month income may not exceed)	DOE 200% Poverty
1	\$35,674	
2	\$46,651	
3	\$57,628	
4	\$68,605	
5	\$79,581	
6	\$90,558	
7	\$92,616	\$94,680
8	\$94,674	\$105,440

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9	\$96,733	\$116,200
10	\$98,791	\$126,960
11	\$100,849	\$137,720
12	\$102,907	\$148,480

LIHEAP intake workers will be provided guidance on following the provisions of WPN 24-3. Families with 7 or more that do not qualify for LIHEAP may still be eligible for weatherization services, and it is incumbent on the Subgrantees to refer these families to WAP for further information. If a family does qualify for WAP, but not for LIHEAP, a separate intake will be done in Hancock by the weatherization office. If eligible for services, these jobs will be 100% DOE funded, with no LIHEAP funds leveraged.

In addition, DHS will work with HES to determine if families with 7 or more in the household that are denied for LIHEAP, but below 200% FPL, could be flagged for follow-up by the Subgrantee.

The contract between the Department of Human Services (DHS) and the Weatherization Community Action Agency (Subgrantee) mandates that each agency certifies the income eligibility of those recipients of weatherization assistance. DHS will ensure compliance through examination of records and reports for each non-profit corporation. DHS has developed a statewide application that ensures that all information requested from the client allows to the maximum extent possible, the most accurate and complete data to determine income eligibility. LIHEAP clients are certified in the Hancock database. All CAP Agencies use Hancock, and are able to access the database for referrals and to maintain waiting lists.

The term "child" shall mean person under eighteen (18) years of age.

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

DHS uses the LIHEAP application certification process to determine eligibility for LIHEAP and WAP. Non-U.S. citizens with "Qualified Alien" status are entitled to LIHEAP/WAP benefits as long as they meet identity, income, and residency requirements.

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

No dwelling unit may be weatherized without documentation that unit is eligible under DOE guidelines. Applications for assistance under this program will be made through the Weatherization Service Agency (Subgrantee). The Subgrantee is responsible for ensuring that the applicant represents a family unit whose income is at or below minimum income guidelines. The contract between DHS and Subgrantees mandates that each agency certifies the income eligibility of prospective recipients of weatherization assistance. DHS will ensure compliance through examination of records and reports for each CAP Agency. DHS has also developed a statewide application that ensures, to the maximum extent possible, that all information requested from the client is accurate and contains complete data necessary to determine income eligibility. LIHEAP and WAP are fully integrated with both systems residing in the Hancock Cloud.

Clients who are home owners are required to show proof of homeownership, and clients who are renters must have signed permission from the building owner/landlord before work can begin.

DHS helps to ensure that the benefits of weatherization are protected for tenants of rental units by requiring 1) An executed copy of the "Authorization to Perform Work" and 2) the "Rhode Island Weatherization Assistance Program Rental Units Building Agreement". These two forms help ensure that written permission of the building owner or his agent is given before commencing work; the benefits of the services accrue primarily to the low-income tenants residing in such units; that for a reasonable period of time after completion, the household will not be subjected to rent increases (unless those increases are demonstrably related to other matters other than the weatherization work performed).

When altering the exterior to any home built before 1966, Historic Preservation protocols must be followed. The Programmatic Agreement between the state (DHS and OER), DOE and the RI Historical Preservation and Heritage Commission (RIHPHC) has been executed, and is uploaded to the SF-424. In addition, the Hancock Energy System has developed and added a "Historic Preservation Review" section on the "Audit Information" screen of the audit tool where users must indicate compliance with Historic Preservation requirements, as applicable.

RI WAP Authorization to Perform Work - uploaded to the SF-424

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RI WAP Rental Units Building Agreement - uploaded to the SF-424

Describe Reweathering compliance

RI will implement the revised re-weatherization policy described in the The Consolidated Appropriations Act of 2021:

(h) AMENDING RE-WEATHERIZATION DATE.—Paragraph (2) of section 415(c) of the Energy Conservation and Production Act (42 U.S.C. 6865(c)) is amended to read as follows: “ Dwelling units weatherized (including dwelling units partially weatherized) under this part, or under other Federal programs (in this paragraph referred to as ‘previous weatherization’), may not receive further financial assistance for weatherization under this part until the date that is 15 years after the date such previous weatherization was completed. This paragraph does not preclude dwelling units that have received previous weatherization from receiving assistance and services (including the provision of information and education to assist with energy management and evaluation of the effectiveness of installed weatherization materials) other than weatherization under this part or under other Federal programs, or from receiving non-Federal assistance for weatherization.”.

Subgrantees are required to maintain historical records of previously weatherized units. The current Hancock client database, as well as older databases (e.g. Access Database, Captain excel spreadsheet, card catalog files) are checked for any previous WAP activity before an audit is scheduled. DHS also reviews the Subgrantee approach to determining building eligibility during the annual subgrantee monitoring.

Describe what structures are eligible for weatherization

Structures eligible for weatherization include single family, manufactured housing, and multi-family dwellings. All structures must be stationary and have a specific mailing/street address. Campers and non-stationary trailers are not eligible for weatherization services. Shelters and group homes may also be weatherized. Eligibility is specified in the "Definitions" section of 10 CFR440.

According to the 2023 Housing Fact Book published by HousingWorksRI at Roger Williams University, RI's population is 1,091,949 which includes 426,769 households. In RI, 62% of households are owners and 38% are renters.

Describe how Rental Units/Multifamily Buildings will be addressed

1. In order to ensure that the benefits of weatherization are protected in accordance with 440.22(b)(3), all weatherization rental units are required to obtain the owner's consent on the "Authorization to Perform Work" Form, and by also signing the "RI WAP Rental Units Building Agreement". Among other things, the Rental Units Building Agreement helps ensure that the benefits of Weatherization services accrue primarily to the low income tenants residing in the units and that for a reasonable period of time after completion that the household will not be subject to a rent increase unless the increases can be attributable to other causes.

2. DHS does not plan to weatherize any large multi-family weatherization buildings with this grant award. In RI, multifamily weatherization needs are addressed through RI Energy's Income Eligible Multi-Family Program, administered by RISE Engineering. Where appropriate, DHS refers inquiries for multi-family weatherization services to RISE. <https://www.rienergy.com/RI-Home/Energy-Saving-Programs/Multifamily>

In RI, large multi-family is defined by:

Buildings with 5+ units and/or properties consisting of four or more 1-4 unit buildings that meet both of the following requirements:

- Are connected or adjacent to each other, or to a 5+ unit building, and;
- Are owned by the same individual or firm.

Stand-alone 1-4 unit buildings that do not meet the above requirements are considered “single-family” and will be served traditionally through WAP or RIE's Income Eligible Services Program as appropriate. RIE's Income Eligible Multi-Family Program funding is \$3,784,200 as outlined in RIE's 2024-2026 Energy Efficiency Plan adopted by the RI Public Utilities Commission.

As provided for in 10 CFR 440.22, a Subgrantee may weatherize a building containing rental dwelling units using financial assistance for dwelling units eligible for weatherization assistance under where:

- (1) The Subgrantee has obtained the written permission of the owner or his agent;

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(2) Not less than 66 percent (50 percent for duplexes and four-unit buildings, and certain eligible types of large multi-family buildings) of the dwelling units in the building:

(i) Are eligible dwelling units, or

(ii) Will become eligible dwelling units within 180 days under a Federal, State, or local government program for rehabilitating the building or making similar improvements to the building..

Procedures for Weatherizing Buildings with Two or More Units.

DOE funding for MF projects may be used only where allowed where minimum program requirements are met.

A. Buildings with Less than 50% of the Dwelling Units Eligible

When less than 50% of the dwelling units in a building are eligible for weatherization, the following procedures must be followed:

- All applicable major air sealing/general heat waste, heating system and wall insulation must be completed on the eligible unit;
- All common areas (hallways, attics, basements) that are immediately adjacent to the eligible unit must be weatherized;
- The building's ineligible units cannot be weatherized.
- Allowable expenditures are limited to those of the eligible unit or units and production credit will be granted for the eligible unit(s) only.

B. Buildings Where 50% of the Units in a Two (2) or Four (4) Unit Building, or 66% of the Units in Any Building, Are Eligible

When 50% of the units in a two (2) or four (4) unit building, or 66% of the units in any building are eligible for weatherization, the Subgrantee may weatherize the entire dwelling with DOE funds.

- All applicable major air sealing/general heat waste, heating system and wall insulation must be completed
- All common areas (hallways, attics, basements) regardless of their location, must be weatherized

Describe the deferral Process

Deferral of weatherization services may be necessary when Health and Safety issues cannot be adequately addressed. Deferral does not mean that the home cannot or will not be weatherized, but that the work must be postponed until the problems leading to the deferral are corrected. If the reasons for deferral are resolved, the home may be considered for weatherization services provided that the application still meets eligibility guidelines.

Auditors must use professional judgment when determining if there are conditions present which may endanger the health/safety of the workers or occupants. Subgrantee staff are expected to refer or connect clients to alternate sources of assistance (i.e. CDBG, Green and Healthy Homes or local government home repair programs) where appropriate. Deferral may also be necessary where occupants are uncooperative, abusive or threatening.

Deferral conditions may include the following: The client has known health conditions that prohibit the installation of insulation and other weatherization materials; The building structure or its mechanical systems, including electrical and plumbing, are in such a state of disrepair that the conditions cannot be resolved within the guidelines and at reasonable costs (repairs are beyond incidental); The house has sewerage or other sanitary problems including pet/animal excrement that can't be corrected through weatherization and would further endanger the client and weatherization installers of weatherization work were performed; The house has been condemned or electrical, plumbing or other equipment has been red tagged by local or state building officials or utility companies and weatherization funds are not sufficient or corrective measures are not allowable costs; Moisture or potential moisture problems are present and cannot be resolved under existing health and safety guidelines and with minor repairs; Dangerous conditions in the home due to high carbon monoxide levels in combustion appliances or their venting which cannot be resolved under existing health and safety guidance. Subgrantees should take immediate action to ensure the combustion appliance is not used, including instructing the client to contact a combustion appliance repair/replacement specialist; The client is uncooperative, abusive, or threatening to the auditor, subcontractors, inspectors, or others who must work on or visit the home; The extent and condition of lead based paint or any other identified hazardous condition in the house which could potentially create further health and safety hazards; Pest infestation that cannot be reasonably removed or poses health concerns for workers; In the judgment of the energy auditor, any condition exists which may endanger the health and/or safety of the subcontractors; Homes with conditions that have the potential to create a health concern requiring more than incidental repair.

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A copy of the RI WAP Deferral of Services Form is uploaded to the SF-424. The Hancock database allows for tracking and reporting of deferrals.

WRF

RI will continue to address deferrals with DOE Weatherization Readiness Funds and will encourage blending with LIHEAP and RI Energy Pre-Weatherization Barriers (PWB) funding to potentially assist more households. DHS has provided updated WRF guidance to Subgrantees in RIWAP Policy Memo 24.6 which has been uploaded to the SF424. It has been uploaded to Hancock "Weatherization Guidelines" as well for all Hancock user access. Homes that have been previously deferred that are still eligible, will be the first to receive services. If the agency has a wait list of deferred homes, these homes should be considered immediately for WRF. For all other WRF needs, the agencies must follow the same priority and ranking used for weatherization. The maximum

WRF Monitoring

Subgrantees will inspect 100 percent of WRF units and DHS will inspect a minimum of 10 percent (the same amount inspected for standard field monitoring). DHS will monitor these funds as part of its annual monitoring of subgrantees to ensure the funds are expended in accordance with this plan and for the purposes approved by DOE, resulting in completed units.

DHS monitoring of WRF projects may also include desktop monitoring, in-process monitoring, and as part of the QCI inspection when a unit is selected for final inspection.

WRF Maximum Per Unit

Sub-grantees can spend no more than \$15,000 of WRF money to prepare a dwelling for weatherization. If a dwelling requires more than \$15,000 to prepare for weatherization, and there are no additional funds to braid, the dwelling must be deferred until the sub-grantee has access to additional funds that they can braid with WRF, or the deferral reason is addressed by other funding sources and weatherization can proceed.

WRF Carryover

All WRF work in PY24 must be completed and inspected by 6/1/25 as WRF cannot be carried over to PY25.

V.1.3 Definition of Children

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

V.1.4 Approach to Tribal Organizations

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

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

The low-income members of an Indian Tribe shall receive benefits equivalent to the assistance provided to other low-income persons within the State. According to the 2020 US Census, there are approximately 4,344 Native Americans living in the State of Rhode Island. Native Americans will be serviced in the Weatherization Assistance Program in the same manner that all other low-income Rhode Islanders are: through the local Community Action Agency that serves the city/town in which they live.

V.2 Selection of Areas to Be Served

All of RI's 39 cities and towns are served by six (6) Subgrantees, all Community Action Agencies. All Subgrantees deliver programs and services to the communities in their catchment area(s), including CSBG, with the exception of BVCAP who provides weatherization services on behalf of Community Care Alliance (CCA) for the City of Woonsocket. The 6 current Subgrantees have been operating weatherization assistance programs for RI residents since the inception of the weatherization assistance program in RI in 1975. All Subgrantees were selected in accordance with the provisions of 10 CFR 440.13.

If there is a need to alter the current RIWAP Subgrantee structure, DHS will add or subtract Subgrantees according to the requirements of 10 CFR440.13 and other applicable DOE guidance. In the event that one or more Subgrantees are needed to deliver weatherization services in the future, DHS will ensure that

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outreach to eligible organizations is conducted for an open, fair and competitive process, and will work closely with DOE project officers on implementation.

East Bay Community Action Agency: East Providence, Barrington, Warren, Bristol, Jamestown, Little Compton, Newport, Portsmouth, Tiverton, Middletown

Comprehensive Community Action Agency: Cranston, Foster, Scituate

Tri-County Community Action Agency: Glocester, North Providence, Burrillville, Smithfield, Johnston, Hopkinton, Narragansett, North Kingstown, Westerly, Exeter, South Kingstown, West Greenwich, Charlestown, New Shoreham, Richmond

Westbay Community Action Agency: Warwick, Coventry, West Warwick and East Greenwich

Providence Community Action Agency: Providence

Blackstone Valley Community Action Agency: Woonsocket, North Smithfield, Pawtucket, Lincoln, Cumberland, Central Falls

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

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

DHS may at its discretion either following notice and a hearing or by agreement with a weatherization subgrantee place an "agency at risk" status as an alternative to suspending or terminating a contract for cause; a finding of non-compliance by a subgrantee with an "agency at risk" status designation shall be cause for suspension or termination of a contract with a weatherization subgrantee.

Should any of the service providers which are identified in this plan cease to administer the Weatherization Program during the year covered by this plan, or are unable to utilize the funds allocated, a temporary service provider may be selected. The temporary service provider may be selected from the existing list of subgrantees.

V.3 Priorities

Department of Energy (DOE) 10 CFR Part 440, Section 440.16 requires that grantees develop procedures to ensure that priority is given to identifying and providing assistance to: elderly persons; persons with disabilities; families with children; high residential energy users; and Households with a high energy burden. Where all of the above is equal, applicants who have been waiting for weatherization services longer, may be prioritized for service over an applicant who has not been on the waiting list as long.

Priority Categories

1. Senior Citizen Household Member: _____
60-65.....1 point
66-71.....2 points

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72-77..... 3 points
78-83..... 4 points
84 + 5 points

2. Disabled: _____
1 point for each disabled household member

3. Families with Children: _____
Under age 1.....5 points
1-2.....4 points
3-5.....3 points
6-9..... 2 points
10-17..... 1 point

4. High Energy User: _____
1 point for High Energy Users

5. High Energy Burden: _____
1 point for High Energy Burden

Parameters are set up in Hancock to calculate if a customer is a High Energy User, and/or have a High Energy Burden. A recent study by the American Council for an Energy Efficient Economy (ACEEE) "Lifting the High Energy Burden in America's largest cities revealed that Providence, RI has the highest percentage of low-income energy burden in the Northeast (Providence, Pittsburgh, Philadelphia, Hartford, New York City, Baltimore, Boston, and Washington DC) based on the average of the median energy burdens across all groups.

RI WAP considers a household that spends more than 10% of their income on energy costs as having a High Energy Burden and priority points are given.

V.4 Climatic Conditions

In Hancock, Subgrantees can choose from the following weather stations for modeling audits and should select the location of the nearest weather station:

Block Island State Airport

Providence TF Green Airport

Because Rhode Island has a short cooling season, RI WAP does not address cooling measures in the DOE Weatherization Assistance Program.

Data for 2023 heating degree days for RI (Providence Green State Airport) was obtained from degreedays.net and has been uploaded to the SF-424.

V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials

RI contracted with Saturn Resource Management to develop the SWS-aligned *Rhode Island Weatherization Field Guide*. RI updated it's Weatherization Field Guide in 2023. All Subgrantees and weatherization contractors were provided copies of the new guide and signed an Acknowledgement of Receipt form. A copy of the field guide is available on DHS' website, and also available in Hancock Weatherization Guidelines.

Energy auditors and state technical monitors are encouraged to download the RI Field Guide onto their iPads for reference while in the field, or when a hard copy is not available.

The "RI WAP IES Operations Manual" has been uploaded to the SF-424 and is accessible for all Hancock users in Hancock Weatherization Guidelines. Energy auditors and state technical monitors are encouraged to upload the Operations Manual to their iPads for easy access while working in the field. In 2024,

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an update to the OM is planned. An OM working group will be convened which will include representation from DHS, CLEAResult and all 6 Subgrantees.

DHS will ensure that all expectations and requirements are communicated and codified in appropriate agreements and contracts. This will include all DHS/CAP Agency contract agreements. All CAP Agency/Weatherization contractor contract agreement and will include the following language:

SPECIFIC TERMS

During the Term, the Subgrantee shall weatherize eligible dwelling units in compliance with the terms of the RI WAP Operations Manual, the RI Weatherization Field Guide, this Agreement, as well as any Federal or State statutes or regulations pertaining thereto, including but not limited to 42 U.S.C. section 6861 et seq.; and 10 C.F.R. Part 440 and 600; the requirements specified in Office of Management and Budget (“OMB”) 2 CFR 200 and all other applicable Federal, State, and local laws, rules, regulations, administrative procedures, guides, manuals, program rules, regulations, and definitions, and any amendments thereto, in performing its obligations under this Agreement. Subgrantee specifically acknowledges that it must comply with all applicable Federal, State, and local laws, rules, and regulations pertaining to wages, hours, conditions of employment, and all health and safety standards.

Subgrantee shall perform weatherization services during the Term in accordance with the U.S. Department of Energy Weatherization Assistance Program State Plan for the State of Rhode Island, the Rhode Island Weatherization Field Guide, the Rhode Island Operations Manual, other State Weatherization directives as applicable, and any amendments thereto (collectively “State Weatherization Plan and Directives”). Subgrantee shall abide by and perform all work in accordance with the RI Weatherization Field Guide which has been aligned with the Department of Energy’s Standard Work Specifications (SWS). The Subgrantee’s signature on this agreement signifies its responsibility to follow all work standards as outlined in the documents referenced in this paragraph.

Subgrantee shall comply with all of the training and certification requirements that are specified in the RI Weatherization Operations Manual, and WPN 22-4 as required by the DOE.

No subcontractor of Subgrantee shall be paid for any work performed until such time as Subgrantee has performed an inspection of all of the weatherization work completed and has determined that any such work has been performed in a satisfactory manner (“Final Inspection”).

Subgrantee shall ensure that all Weatherization staff and subcontractors who perform or provide Weatherization services to client homes receive and adhere to all standards as outlined in Rhode Island’s Weatherization Field Guide, The Rhode Island Weatherization Assistance Program Operations Manual, the Department of Energy Weatherization Assistance Program State Plan for Rhode Island and other State Weatherization directives as applicable. The Subgrantee’s signature on this agreement signifies its responsibility to follow all work standards as outlined in the documents referenced in this paragraph as well as its responsibility to ensure that its Weatherization staff and subcontractors receive and review these documents and use them to guide the Weatherization work performed in client homes by them.

Subgrantee shall include language in subcontractor contracts detailing that all Weatherization services will be performed in accordance with the standards outlined within the documents as described in this Agreement.

The type of weatherization work to be performed by the subgrantees will include energy measures identified by the Hancock Energy Audit Tool (HEAT). All materials will be installed in accordance with the DOE-approved energy audit and Appendix A of 10 CFR 440. RI conducts HEAT audits for every single family-site built unit.

In 2024, RIE's baseload audit (formerly known as the Appliance Management Program or AMP) was integrated into the whole house audit (i.e. Comprehensive Audit). This program modification was made to streamline the energy audit process from both a programmatic and customer perspective. All RIE baseload measures with the exception of lighting replacements are now included in the comprehensive audit. Lighting was eliminated as a cost effective measure by RIE as of 1/1/24.

Field guide types approval dates

Single-Family: 7/25/2023
Manufactured Housing: 7/25/2023
Multi-Family:

V.5.2 Energy Audit Procedures

Audit Procedures and Dates Most Recently Approved by DOE

Audit Procedure: Single-Family
Audit Name: HEAT

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Approval Date: 5/26/2022

Audit Procedure: Manufactured Housing
Audit Name: HEAT
Approval Date: 5/26/2022

Audit Procedure: Multi-Family
Audit Name:
Approval Date:

Comments

RI received Single Family and Manufactured Housing approval from DOE in 2022

Tool	Building Type	Expiration Date
HEAT	Site-Built Housing (SBH) (1-4 Units)	5/26/2027
HEAT	Manufactured Housing (MH)	5/26/2027

Mobile Home Audit
Mobile homes account for 0.9% of the total housing units in the state. A full HEAT audit is modeled for every mobile home weatherization job.

Multi-Family Weatherization
DHS does not plan to complete any large multi-family projects with DOE funds. Rhode Island has a utility-funded low-income multi-family weatherization program that is administered by RISE Engineering and all requests for weatherization services in large multi-family buildings are referred to that program.

<https://www.rienergy.com/RI-Home/Energy-Saving-Programs/Multifamily>

Small multi-family weatherization (2-4 units) are modeled in HEAT audit to determine appropriate cost-effective measures.

V.5.3 Final Inspection

As specified in 10 CFR 440.16, one hundred percent (100%) of weatherized dwelling units shall be inspected and certified as complete by the Subgrantee's authorized agent, prior to reporting said dwelling units as completed home. This provision is included in DHS/Subgrantee contract agreements. The QCI form certifies that each home has been completed and is signed and dated by the client, the QCI inspector, and the weatherization coordinator. Final inspections must include all health and safety testing including combustion efficiency, CO testing of all combustion appliances and worst case draft testing of all vented combustion appliances. DHS recommends that subgrantees perform "real time" final inspections whenever possible, on the last day of scheduled work, and while the weatherization contractor is still on-site. This practice improves responsiveness and efficiency of program operations by allowing contractors to immediately address any unsatisfactory work. Subgrantees are strongly encouraged to conduct "work in progress" inspections on at least 20% of jobs to review contractor work, discuss issues and concerns, check for lead safe work practices, and inspect attic air sealing work.

Disciplinary actions for inadequate inspection practices are reviewed on a case-by-case basis, and are identified through state monitoring visits. When disciplinary action is warranted, a subgrantee corrective action plan may be requested by the state, and should reflect the significance of the finding or concern. Examples of when disciplinary action may be warranted include:

- A. Repeated occurrences of failed CAZ testing resulting in re-work;
- B. Repeated monitoring finding related to the contractor performing the work;
- C. Repeated incidents of unsatisfactory, sub-standard work performance;
- D. Repeated incidences of violating DHS, DOE or LIHEAP program requirements;

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E. Fraudulent activity or fraudulent charges that are being reimbursed by the Weatherization Assistance Program;

F. Negligent work performance that leaves clients or other workers in imminent danger (i.e. Health and Safety such as carbon monoxide allowed to enter the home or a gas leak not addressed).

Depending on the severity of the issue, consequences may include:

1. Remedial Training, Category A. A worker (auditor or contractor) that falls under **Category A** will be recommended for remedial training and may be denied from participating in the program until the remedial training is completed. In addition to remedial training, an increase of on-the-job training or supervision may be warranted as well.

2. Denial of Participation. A contractor or worker performing work that falls under categories **B, C and D** may be denied participation for up to 2 years.

3. Permanent Debarment - A contractor or persons performing work that falls under category **E and F** may be permanently debarred from providing weatherization services through DHS' Weatherization Assistance Program.

In all disciplinary cases, an increase in the number of units monitored will be implemented.

CAP Agency QCI Inspectors (15)

BVCAP - 1 QCI (Ed Fisk)

CCAP - 3 QCI (Merredith Plante, Dave Mello, Christina Polhemus)

Eastbay - 2 QCI (James Gauvin, Nick Foss)

CAPPRI - 4 QCI (Jamie Paquin, Ervin Guterrez, Rafael Figueroa, Brian Rego)

Tri-County - 3 QCI (Steve Saccoccio, Tyler Macari, Jacob Messorre)

Westbay - 2 QCI (Bill Larocque, Shawn Walsh)

State Monitors

Ramon Lantigua - QCI

Derek DeCosta - QCI

John Costello - QCI

All QCI individuals must submit copies of their certifications (Lead Renovator, BA, QCI, EA, other HEP certifications) to DHS.

The RI WAP Field Inspection Form has been uploaded to the PAGE Document Library.

QCI Inspection Procedures

The following procedures are provided as a guide for performing the quality control inspection services:

1. QCI Inspector schedules an appointment with the customer to visit the dwelling and perform the inspection;
2. QCI Inspector arrives at dwelling equipped to conduct all necessary tests and services at the appointed time; Inspector performs blower door test verify results of air infiltration reduction achieved by the local agency; combustion efficiency test, and walk-through inspection as appropriate and required;
3. QCI Inspector records comments and quality assessment on the quality control form. Inspector also records variances in resource accountability between work order and/or invoice and inspection findings;
4. Signature of customer is obtained (signature must be a resident adult); and
5. Complete the Quality Control Inspection Form in the prescribed manner and forward a copy to the local agency.

The purpose of the Quality Control inspection is to:

- To provide services in a manner that meets the highest level of professionalism and to comply with standards established by DHS, the federal government, and the industry; and
- To provide services in a timely fashion and with the highest level of resource accountability possible in accordance with the scope of work provided.

The Subgrantee is responsible for ensuring that all Quality Control Inspectors are adequately trained and credentialed.

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Quality Control Inspectors should be independent of the work they are inspecting. Ideally, the QCI inspector should not be the same individual who audited the property. In instances where this is not possible due to staffing, DHS will increase monitoring to 10% of completed units.

Where the auditor and the final inspector are the same, at least 10 percent quality assurance reviews will be conducted.

It is the responsibility of the Quality Control Inspector to ascertain the completeness and quality of work according to the work order, of each dwelling unit before certifying in the Hancock system that the unit is complete.

BPI Technical Standards, The Rhode Island Weatherization Field Guide installation processes and SWS quality of standards should all be considered in this process. At a minimum, Quality Control Inspections must contain these elements:

- Perform a blower door test to verify results of air infiltration reduction achieved;
- Perform a combustion efficiency test of the central heating system;
- Perform a walk-through inspection of the property to verify the presence of installed materials and that the installation of materials as recorded on the Work Order and Invoice documents meet SWS quality;
- Document customer comments and obtain customer signature on the QCI Form verifying the work performed;
- Certify completeness and quality of all items listed in the work scope in the Hancock system;
- Perform all diagnostic testing, including CAZ testing, as part of the inspection process.

DHS' QCI inspectors are required to review not less than 10% of completed units. If the QCI Inspector finds a pattern of missing or poor quality work in the random sampling, a higher percentage or all dwelling units of that agency may be inspected.

The agency must access Hancock and create a work order of all items that failed. When the work has been corrected, the Subgrantee will notify DHS and arrange for the QCI re-inspection.

Units with failed measures must be resolved within five working days. Failure to adhere to this policy could result in the withholding of funds, stopping payment on current invoices and, in extreme cases, suspension or removal from one or more of RI WAP/IES weatherization programs.

DHS requires that all outstanding "failed" units be resolved and treated as a priority. Repeated failures may result in DHS requesting a corrective work plan to be developed by the agency.

Acceptance of Work

To clarify standard inspection protocols, please note the following:

- A unit will fail inspection if materials reported as installed cannot be found;
- A unit will receive a poor QA inspection if measures were not installed to standards;
- No unit will be failed for missed opportunities regarding air infiltration reduction, unless the inspector uses a blower door and can verify that substantial air leakage still exists;
- A unit may fail if major weatherization services or leveraging opportunities were missed (e.g., no attic insulation installed and could have been, no furnace work performed etc.) and the file does not indicate why the service was omitted.
- A unit will fail if additional, uninstalled health and safety measures are still required to protect the family.

Customer "No-Show" Policy

It is anticipated that a small percentage of units will not receive Quality Control inspections due to a variety of extenuating circumstances including:

- Customer moves/dies & property is vacant or occupied by a second party;
- Customer is unavailable after several attempts to re-enter and inspect.

The following are the procedures for reporting "no show" properties:

1. Local agency completes the weatherization services.
2. QCI Inspector will be responsible for contacting landlords/property managers to seek assistance in completing the inspection process, as required.
3. QCI Inspector must make several attempts to enter the property, including:
 - a. Contacting the customer by telephone to schedule appointment;
 - b. Forwarding of a letter setting a time and date for the inspection;
 - c. Conducting an unscheduled site visit to the dwelling; and
 - d. In the case of rental properties, performing the previous steps with the landlord as well as the customer.

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4. Where QCI inspections are not possible, an alternative (non-DOE) funding source must be used. The unit cannot be reported to DOE as a completed unit without a QCI inspection.

The Subgrantee is required to notify DHS that the unit cannot be accessed and provide documentation of each attempt to contact.

Because RI WAP does not use DOE resources to weatherize multi-family buildings at this time, there is no plan to receive training on the NREL Multifamily Quality Control Inspector JTA.

Contract language (see Special Terms) is included in Subgrantee Contractor Agreements which codify the signatory's responsibility to perform work to the specifications outlined in WPN 22-4 and in accordance with other state and federal requirements.

QCI - Overall Job Rating

- Good (no missed opportunities, all work installed according to standards)
- Poor (measures were not installed to standards, client files incomplete)
- Fail (materials reported as installed are not found, major weatherization opportunities were missed without an explanation of why the measure(s) were omitted in the client file, uninstalled health and safety measures that are still required to protect the family)

No unit will be failed for missed opportunities regarding air infiltration reduction, unless the inspector uses a blower door and can verify that substantial air leakage still exists

Disciplinary actions for non-compliance with post inspection protocols will be classified as:

- Level 1: Subgrantee has routinely responded to corrective actions, 100% effective.
- Level 2: Subgrantee has had marginal or insufficient results responding to corrective improvement on initial responses, but ultimately addressing all concerns and demonstrating improvement. Subgrantee will be subject to increased state monitoring and inspection
- Level 3: Subgrantee has failed to address corrective actions and/or deficiencies repeatedly. This designation may result in temporary suspension and disallowed costs.
- Level 4: Indefinite suspension, defunding of Subgrantee and contract termination.

Specific Terms

During the Term, the Subgrantee shall weatherize eligible dwelling units in compliance with the terms of the RI WAP Operations Manual, the RI Weatherization Field Guide, this Agreement, as well as any Federal or State statutes or regulations pertaining thereto, including but not limited to 42 U.S.C. section 6861 et seq.; and 10 C.F.R. Part 440; the requirements specified in Office of Management and Budget ("OMB") 2 CFR 200 and all other applicable Federal, State, and local laws, rules, regulations, administrative procedures, guides, manuals, program rules, regulations, and definitions, and any amendments thereto, in performing its obligations under this Agreement. Subgrantee specifically acknowledges that it must comply with all applicable Federal, State, and local laws, rules, and regulations pertaining to wages, hours, conditions of employment, and all health and safety standards.

Subgrantees shall perform weatherization services during the Term in accordance with the U.S. Department of Energy Weatherization Assistance Program State Plan for the State of Rhode Island, the Rhode Island Weatherization Field Guide, the Rhode Island Operations Manual, other State Weatherization directives as applicable, and any amendments thereto (collectively "State Weatherization Plan and Directives").

Subgrantees shall abide by and perform all work in accordance with the RI Weatherization Field Guide which has been aligned with the Department of Energy's Standard Work Specifications (SWS).

Subgrantees shall comply with all of the training and certification requirements that are specified in the RI Weatherization Operations Manual, and WPN 22-4.

Subgrantees shall provide in-home energy education regarding reducing energy consumption and health and safety concerns to the persons who receive the weatherization services pursuant to this Agreement.

No subcontractor of Subgrantee shall be paid for any work performed until such time as Subgrantee has performed an inspection of all of the weatherization work completed and has determined that any such work has been performed in a satisfactory manner ("Final Inspection").

Subgrantee shall select subcontractors in a manner that assures competitive procurement of services in compliance with all applicable laws, including but not

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limited to 2 CFR 200.318 through 2 CFR 200.326. Neither Subgrantee nor any subcontractor of Subgrantee shall be reimbursed until such time as Subgrantee has performed an inspection of the work performed and has determined in writing that any such work has been completed in a satisfactory manner.

Subgrantee shall ensure that all Weatherization staff and subcontractors who perform or provide Weatherization services to client homes receive and adhere to all standards as outlined in Rhode Island's Weatherization Field Guide, The RI WAP Operations Manual, the Department of Energy Weatherization Assistance Program State Plan for Rhode Island and other State Weatherization directives as applicable. The Subgrantee's signature on this agreement signifies its responsibility to follow all work standards as outlined in the documents referenced in this paragraph as well as its responsibility to ensure that its Weatherization staff and sub-contractors receive and review these documents and use them to guide the Weatherization work performed in client homes by them.

Subgrantee shall include language in subcontractor contracts detailing that all Weatherization services will be performed in accordance with the standards outlined within the documents as described in this Agreement.

In making any procurement or entering into any contract that requires the expenditure of funds provided pursuant to this Agreement, Subgrantee shall adhere to the applicable provisions of 10 CFR. 440, 10 and 2 CFR 200.318 through 2 CFR 200.326, and Minority Business Enterprise (MBE) policies including R.I.G.L. 37-14.1, regarding procurement.

Subgrantee acknowledges and agrees that funds provided through this Agreement shall not be used for the purchase or improvement of land, or for the purchase, construction, or permanent improvement (other than low-cost residential weatherization or other energy- related home repairs) of any building or other facility.

Subgrantee acknowledges and agrees that it must maintain an overall average cost per dwelling amount not to exceed \$8,497 for PY 2024.

Subgrantee acknowledges and agrees that the funds provided through this Agreement shall be used to supplement, and not supplant, State or local funds and, to the extent practicable, to increase the amounts of such funds that would be made available in the absence of Federal funds for carrying out activities specified in this Agreement.

V.6 Weatherization Analysis of Effectiveness

Although DHS has not conducted a formal program evaluation of cost effectiveness, adhering to the SIR requirement helps ensure that the program maintain its mainstay of cost-effectiveness. EA and QCI Inspector training and certification will also help ensure that high quality work standards and cost effective energy conservation practices are followed. Recent DOE requirements for Quality Work Plans and Quality Management Plans will help improve the overall efficiency of WAP. DHS will continue it's efforts for program and process improvement by providing technical and program training for state and subgrantee staff as needed.

Subgrantees are subject to ongoing fiscal and program monitoring. Subgrantees are required to inspect 100% of the work completed and maintain control over expenditures in accordance with federal financial management guidelines and generally accepted accounting procedures.

Annual program and fiscal assessments provide a second level of weatherization program analysis. The monitoring effort focuses on accountability and technical proficiency. Subgrantee records, client files, and invoices are checked for consistency and compliance. At least 10% of the housing units completed are physically inspected by DHS state monitors. Work orders are cross-checked with the measures that have been installed in the home. The technical monitors also evaluate the workmanship and techniques employed by weatherization contractors, focusing on compliance with weatherization priorities and the quality of work.

DHS holds weekly Weatherization staff meetings to discuss program issues and concerns, best practices, monitoring issues, and trends.

DHS and CLEAResult (lead vendor for RI Energy's Income Eligible Services Program) hold monthly KPI meetings with the 6 Subgrantee weatherization coordinators. A copy of the KPI worksheet is attached to the SF 424 for reference. The purpose of the monthly KPI meetings is to review and discuss: the prior months' production goals and spending, T&TA and staffing and provide support for program development as needed. These meetings serve as opportunities to discuss any programmatic changes, discuss areas of concern and general peer to peer exchange.

DHS has created Hancock-generated reports for a 12-month period that feature blower door reduction and air sealing hours by job number. In PY24, DHS plans to conduct an in-depth analysis of the report to help guide enhanced program performance. This data will help determine best practices for successful CFM reductions, and sharing those within the RI network. DHS will also explore with Hancock the viability of creating a comprehensive report using the Energy Savings and Modeling Reports which are generated for each completed audit. These reports may also be a useful resource for analyzing program effectiveness by BTU's saved and annual savings.

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V.7 Health and Safety

DHS and its Weatherization Subgrantees have always considered the health and safety of its weatherization clients a high priority. Health and Safety measures are measures that are necessary to maintain the physical well-being of both the occupants and the weatherization workers where the actions are necessary as a result of weatherization work. The reason for all health and safety work must be documented in the client file, including pictures and written documentation.

The 2024 RI WAP Health and Safety Plan, uploaded to the SF-424, is a working document and has been provided to all RI WAP Subgrantees. The document will be updated as necessary, and follows all requirements of WPN 22-7.

The budget matrix included in RI's Health and Safety Plan includes the following information:

Avg. Health & Safety Cost/Unit	\$1,217
Est Production	151
Est Program Operations	\$1,230,377
H&S Budget (total avg. H&S cost per unit * Est production)	\$130,000
Requested H&S % per unit (H&S Budget/Program Operations)	10.6%

A copy of the H&S Worksheet has been uploaded to the SF-424 which provides historical data for H&S measures used as a basis for H&S budget development. DHS has budgeted/requested \$130,000 for health and safety in the PY24 state plan application. RI will braid LIHEAP and/or RIE funds on jobs as needed to supplement the DOE H&S allocation.

The WAP Hancock database allows the state and Subgrantees to track and manage H&S measures and costs more efficiently. Subgrantees can quickly see spending percentages by category and funding source by accessing the [Production and Job Cost Report](#) in Hancock.

Additionally, Hancock has a feature whereby jobs that exceed the H&S average job funding limit (\$1,000) are sent to "state approval" before they can be sent to work order. This control allows the agencies, and DHS, to track Health and Safety averages and address any issues before a work order is created.

Job Funding Limits:

DOE WAPHealth and Safety \$1000.00
DOE WAPMaterials and Labor - On-Site\$8,000.00

Subgrantees are encouraged, but not required, to maintain Pollution Occurrence Insurance.

Clients must be informed of any Health and Safety risk discovered during the inspection process. In the case of a rental property, the property owner and/or authorized agent must also be notified. As potential hazards are identified, an assessment must be made on severity, and how they will be addressed, up to and including deferral. Deviations from the RI Health and Safety Plan must be requested in the form of a waiver, and must include a thorough assessment (including photo documentation) of the situation and a detailed plan for addressing the issue.

At-Risk Customers

RI WAP provides AC assistance through RI Energy. Window AC's are replaced with energy star models; almost all AC's are replaced. There is no assessment of an "at risk" situation; if the customer is income eligible, they are eligible to participate in the program. Window AC's are replaced 1:1 (eg. like for like).

The RI WAP IES "Audit Instructions Form" seeks to obtain customer health and safety information that may be affected by the weatherization work set to occur. If it is found that a customer may be considered "At Risk" based on the information provided, the job will be deferred for the health and safety of the customer.

V.8 Program Management

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V.8.1 Overview and Organization

LIHEAP and WAP programs are under the jurisdiction of the Department of Human Services, Division of Community Services. DHS is an organization of opportunity, working hand-in-hand with other resources in Rhode Island to offer a full continuum of services for families, adults, children, elders, individuals with disabilities and veterans. The goals of DHS are to create families that are strong, productive, healthy and independent; adults that are healthy and reach their maximum potential; Children that are safe, healthy, ready to learn and reach their full potential; ensure that elders and individuals with disabilities receive a full continuum of services to enhance their quality of life; and that veterans are cared for and honored.

An organizational chart which show's RI WAP placement within the Department of Human Services has been uploaded to the SF-424.

An organizational chart for the Weatherization Assistance Program itself has been uploaded to the SF-424.

The State Energy Plan (SEP) program remains at the Office of Energy Resources in the RI Department of Administration. The Office of Housing and Community Development (OHCD) administers all CDBG grants awarded to the State of Rhode Island. The State Community Development Block Grant (CDBG) program is intended to develop viable communities by providing decent housing, expanding economic opportunities and creating suitable living environments - primarily for low/moderate income persons (those earning at or below 80% of Area Median Income). Each year the State of Rhode Island receives a formula allocation of CDBG funding from the Department of Housing and Urban Development (HUD) to be distributed to eligible Rhode Island communities.

The weatherization assistance program is operated by six community action agencies statewide. Historically, RI Community Action Agencies have implemented WAP at the local level with the exception of the multi-family program that was administered by RI Housing during the ARRA-era.

V.8.2 Administrative Expenditure Limits

DHS will comply with the rules for administrative limits which states that not more than 15% of any grant made to a state may be used by the grantee and Subgrantee for administrative purposes in carrying out duties under this part, except that not more than 7.5% may be used by the state for such purposes, and not less than 7.5% must be made available to Subgrantees by states. All six Subgrantees will receive less than \$350,000 in PY24 DOE funds. RI provides LIHEAP administrative funds and LIHEAP program support funds to all six Subgrantees to help with WAP program implementation.

V.8.3 Monitoring Activities

In accordance with 10 CFR 440, DHS, as the Grantee for the Weatherization Assistance Program, will perform monitoring and oversight of WAP program, and establish monitoring procedures for evaluating Subgrantee performance. Monitoring functions as the state's principal method for determining Subgrantee compliance and evaluating the effectiveness of WAP policies and procedures. All monitoring activities will be conducted in compliance with DOE WPN 22-4, the RI Weatherization Field Guide, the approved DOE state plan, the RI WAP/IES Operations Manual, and DOE WPN 24-4.

DHS program, fiscal, and technical staff will monitor Subgrantee activities to ensure that the highest quality weatherization services are provided to eligible low-income Rhode Islanders. Effective monitoring provides objective reporting to and from Subgrantees and makes recommendations to address program and administrative deficiencies and needs. Subgrantee monitoring is an on-going process which involves the coordinated and cooperative efforts of both DHS and its Subgrantees. DHS will follow the updated monitoring approach outlined in WPN 24-4: WAP Monitoring Procedures.

Subgrantee Programmatic and Management Monitoring includes the following areas: Subgrantee Review; Financial/Administrative; Equipment/Inventory/Materials; Eligibility; Rental; Feedback and Reporting; Energy Audits; Field Work; Health and Safety; Quality Assurance; Training and Technical Assistance; Staff or Entity performing the monitoring; and How monitoring results are handled and required follow-up procedures. Subgrantee Monitoring includes an evaluation of the following areas: Program Overview (Client File Review, Work Orders, etc.); Financial/Administration; Inventory; Energy Audits; Qualifications and Training; Weatherization of Units; Health and Safety; Final Inspections; Staff or entity performing the monitoring; and How monitoring results are handled and required follow-up procedures. Financial Monitoring will evaluate the following: Financial Management/Accounting Systems and Operations; Audits; Payroll/Personnel; Vehicles and Equipment; Procurement; Sub-awards/Sub-grantee Monitoring; Invoicing; Records Retention; Staff or entity performing the monitoring and; How monitoring results are handled and required follow-up procedures.

Each subgrantee is required to submit a copy of their annual audit report to DHS within six (6) months of their fiscal close date. Those audit reports, along with

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their A-133 single audit are reviewed for findings. Any finding related to either the Weatherization Assistance Program (DOE or LIHEAP) and/or the Low Income Home Energy Assistance Program (LIHEAP) must be addressed in a corrective action plan to DHS. The state may take additional actions as it deems necessary.

During the grant period, DHS staff will conduct an annual comprehensive on-site monitoring visit to each Subgrantee. Monitoring tasks are shared by the DHS weatherization manager (Chief Program Development), three state monitors, and DHS Financial Management. This visit includes a review of client files, administrative systems, client priorities, leveraging activities, contractor procurement, utilization and file maintenance, technical procedures (energy audits, health and safety testing, work orders, contractor invoices, quality control inspections). The monitoring will also include a review by a state fiscal monitor to ensure the soundness of the subgrantees accounting systems so that grant funds are expended in accordance with applicable law, including regulations contained in 2 CFR 200, Weatherization Program Notices; and other procedures that DOE may issue. Whenever possible, WAP monitoring reviews will be coordinated with LIHEAP on-site monitoring to maximize utilization and efficiency of resources.

Findings such as waste, fraud, or abuse will be reported to DOE immediately.

Subgrantees are subject to removal from the program and will be defunded of all remaining allocations in the event that findings remain consistently non-compliant with either state or federal requirements. Such findings may include, but are not limited to: consistent sub-standard workmanship with no measureable improvement within 90 days of notification; inadequate fiscal or management policies, procedures, or enforcement of controls; failure to improve current management systems within stated notification timeframes and/or implementation of corrected policies, procedures and practices.

Technical field staff will review inventory (weatherization tools and equipment), and field work. Each subgrantee will be visited by a QCI-certified technical field monitor at least once per monitoring year to review no less than 10% of completed units and 10% of client files to ensure quality workmanship and that DOE guidelines are followed. The state technical monitors detail inspection findings on a "QCI Inspection Report", and provide a copy to the Subgrantee within 10 days, whenever possible. If follow-up work is ordered, the agency will arrange for the necessary work to be performed, and notify the technical monitor once the work is complete. In all instances, if significant deficiencies are discovered, such as health and safety violations, poor quality of materials, major measures missed, DHS will require that the Subgrantee take appropriate corrective action to resolve the outstanding issues, usually within 30 days. The inspector will also increase the number of units reviewed and the frequency of monitoring visits for that CAP Agency until they can be assured that all deficiencies are resolved. Once deficiencies are corrected and procedures are put in place to prevent reoccurrence, DHS will resume its regular monitoring procedures for that agency.

DHS will conduct an exit conference at the close of each annual assessment. Within 30 calendar days after each visit, Subgrantees will be provided a written report that includes programmatic strengths, programmatic weaknesses, training needs and recommendations, and deficiencies requiring immediate attention. These reports will summarize the findings and, when necessary, direct the Subgrantees to take specific actions to correct issues of non-compliance and/or to develop a plan of action to improve performance. Reports are sent to the CAP Agency Executive Director who must respond within 30 days and provide evidence or assurance, as appropriate, of all corrective actions taken. Monitoring reports will include a reminder that suspension of funding is possible if a Subgrantee fails to respond within the allowable time frame.

DHS has developed a "Subgrantee Monitoring Analysis Overview", using an Excel spreadsheet, which tracks and summarizes each Subgrantees' financial reviews, program monitoring reports, outstanding issues, and will identify each Subgrantees' needs, strengths, and weaknesses. By organizing state monitoring information onto one spreadsheet, DHS will be better able to gauge and measure success and improvements at the agencies from year to year.

DHS will also include a copy of the overview with its T&TA, Monitoring and Leveraging Report. DHS will also provide information on: Subgrantees monitored; Any major findings (waste, fraud and abuse) and resolutions; Trends with respect to findings, concerns or other issues; Needed T&TA (programmatic/administrative, technical, financial); Any Subgrantees that are considered high risk and plan for how to resolve; and outcome activities involving T&TA and monitoring training.

ON-GOING TECHNICAL MONITORING

State monitors visit with Subgrantees regularly to perform file reviews, conduct field inspections with contractors, auditors, and final inspectors; and provide technical assistance as necessary. The three state technical monitors (Ramon Lantigua, John Costello and Derek DeCosta) are responsible for in-field monitoring activities including monitoring completed jobs (10%) and in-progress jobs, conducting contractor quality assurance reviews, providing on-site T&TA, resolution of auditor and contractor issues, addressing questions and concerns, responding to client complaints etc. Because of Rhode Island's small geographical size - 37 miles wide and 40 miles long - DHS field monitors are routinely "out in the field" providing T&TA to auditors and contractors and responding to requests for assistance while jobs are in progress.

Technical monitors also inspect units "in progress" beyond the 10% completed units in order to assess: quality and compliance; appropriate and allowable materials; appropriateness of energy audits (no missed opportunities); comprehensive final inspections; safe work practices, such as lead safe weatherization protocols; and other factors that are relevant to on-site work.

Targeted training and technical visits are conducted if problems are identified, and until the issue or concern is resolved. State technical monitors complete written field reports after each monitoring visit, and a copy is sent to the agency for their files. If there are any call backs as a result of the technical monitoring visit, the Subgrantee must provide DHS with the resolution of the call back. Monitoring visits are also used to identify problems and potential training

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opportunities. Call backs related to the work of WAP contractors are completed at no cost to WAP. If additional work that was not identified by the Subgrantee but is needed and is identified by DHS inspectors, and the unit has already been reported to DOE, no DOE funds can be used to complete the work. Typically, LIHEAP funds are used to cover such costs.

All field monitors have received extensive training in all aspects of weatherization including:

BPI Building Analyst Professional Certification;

Energy Auditor Certification;

Quality Control Inspector Training and Certification ;

Advanced Blower Door/Pressure Diagnostics Training;

Combustion Safety Training;

Thermal Imaging Camera Training;

EPA Lead RRP Certified Renovator;

Lead Safe Work Practices Training

OSHA Confined Space Training

ASHRAE 62.2 2016 Training

Advanced Air Sealing Training;

HEAT Audit Training;

Appliance Management Training;

CAZ/Worst Case Training

In addition to these formal trainings, the state technical monitors have also attended continuing education opportunities at BPA Conferences, local training opportunities (RI Building Code, RI Builders Association, CLEAResult etc.), CHP, NYSWDA, and others.

Grantee T&TA funds are used to support personnel costs for the three technical monitors. 30% of grantee T&TA funds are used to support state monitoring.

Quality Control Inspection

RI WAP requires Quality Control inspection for every unit assisted through all weatherization programs. Every weatherized unit reported as a completed unit must receive a quality control inspection to ensure that all work meets the minimum specifications outlined in the SWS.

QCI Inspection Procedures

The following procedures are provided as a guide for performing the quality control inspection services:

1. QCI Inspector schedules an appointment with the customer to visit the dwelling and perform the inspection;
2. QCI Inspector arrives at dwelling equipped to conduct all necessary tests and services at the appointed time; Inspector performs blower door test verify results of air infiltration reduction achieved by the local agency; combustion efficiency test, and walk-through inspection as appropriate and required;
3. QCI Inspector records comments and quality assessment on the quality control form. Inspector also records variances in resource accountability between work order and/or invoice and inspection findings;
4. Signature of customer is obtained (signature must be a resident adult); and
5. Complete the Quality Control Inspection Form in the prescribed manner and forward a copy to the local agency.

The purpose of the Quality Control inspection is to:

- To provide services in a manner that meets the highest level of professionalism and to comply with standards established by DHS, the federal government, and the industry; and
- To provide services in a timely fashion and with the highest level of resource accountability possible in accordance with the scope of work provided.

The Subgrantee is responsible for ensuring that all Quality Control Inspectors are adequately trained and credentialed.

Quality Control Inspectors must be independent of the work they are inspecting. The Quality Control Inspector should not be the same individual who audited the property or performed any of the work for the property they are inspecting. In cases where the initial auditor and the QCI inspector are the same person, QCI inspections will be increased to ensure that audits are being performed consistently and correctly (10% minimum).

It is the responsibility of the Quality Control Inspector to ascertain the completeness and quality of work according to the work order, of each dwelling unit before certifying in the Hancock system that the unit is complete. BPI Technical Standards, The Rhode Island Weatherization Field Guide installation processes

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and SWS quality of standards should all be considered in this process.

At a minimum, Quality Control Inspections must contain these elements:

- Perform a blower door test to verify results of air infiltration reduction achieved;
- Perform a combustion efficiency test of the central heating system (fossil fuels) to verify results of furnace service contractor;
- Perform a walk-through inspection of the property to verify the presence of installed materials and that the installation of materials as recorded on the Work Order and Invoice documents meet SWS quality;
- Document customer comments and obtain customer signature on the Customer Quality Control form which verifying the work performed; and
- Certify completeness and quality of all items listed in the work scope in the Hancock system.

If the QCI Inspector finds a pattern of missing or poor quality work in the random sampling, a higher percentage or all dwelling units of that agency may be inspected.

“Poor” rated units must be resolved within five working days. Failure to adhere to this policy could result in the withholding of referrals, stopping payment on current invoices and, in extreme cases, suspension or removal from one or more of RI WAP/IES weatherization programs.

Acceptance of Work

To clarify standard inspection protocols, please note the following:

- A unit will fail inspection if materials reported as installed cannot be found;
- A unit will receive a poor QCI inspection if measures were not installed to standards;
- No unit will be failed for missed opportunities regarding air infiltration reduction, unless the inspector uses a blower door and can verify that substantial air leakage still exists;
- A unit may fail if major weatherization services or leveraging opportunities were missed (e.g., no attic insulation installed and could have been, no furnace work performed etc.) and the file does not indicate why the service was omitted.
- A unit will fail if additional, uninstalled health and safety measures are still required to protect the family.

Customer “No-Show” Policy

It is anticipated that a small percentage of units will not receive Quality Control inspections due to a variety of extenuating circumstances including:

Customer moves/dies & property is vacant or occupied by a second party; or Customer is unavailable after several attempts to re-enter and inspect.

The following are the procedures for reporting "no show" properties:

1. Local agency completes the weatherization services and forwards the Work Order to the QCI Inspector.
2. QCI Inspector will be responsible for contacting landlords/property managers to seek assistance in completing the inspection process, as required.
3. QCI Inspector must make several attempts to enter the property, including:
 - a. Contacting the customer by telephone to schedule appointment;
 - b. Forwarding of a letter setting a time and date for the inspection;
 - c. Conducting an unscheduled site visit to the dwelling; and
 - d. In the case of rental properties, performing the previous steps with the landlord as well as the customer.

The QCI Inspector alerts DHS staff that the unit cannot be accessed and provides documentation of each attempt to contact. Units that do not receive a full QCI inspection may not be charged to DOE. RIE or LIHEAP funds must be used.

DHS has contracted with Community Housing Partners (CHP) to conduct a statewide energy auditor assessment. All RIWAP energy auditors participated, and a final report with T&TA recommendations was provided to help guide T&TA planning.

PY24 Annual Program Monitoring Calendar

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BVCAP Annual Program Monitoring: March, 2025

CCAP Annual Program Monitoring: April, 2025

East Bay Annual Program Monitoring: May, 2025

CAPP Annual Program Monitoring: June, 2025

Tri-County Annual Program Monitoring: July, 2025

Westbay Annual Program Monitoring: August, 2025

Annual Fiscal Monitoring: Annual DOE fiscal monitoring is done in conjunction with LIHEAP fiscal monitoring. DHS will keep DOE informed of when this occurs on bi-weekly calls.

Annual Technical Monitoring: PY24 Technical monitoring - 10% of completed units - will be completed by 8/1/25.

All annual technical, program and fiscal reports will be uploaded to PAGE when completed. In addition to electronic reports, state technical monitoring reports are uploaded to the customer job file in Hancock for DHS and Subgrantee reference.

V.8.4 Training and Technical Assistance Approach and Activities

In RI, training and technical assistance activities are directed at assessing and improving the overall delivery of weatherization services to income eligible households. Maximizing energy savings, minimizing production costs, improving program management, improving the technical skills of all weatherization workers (auditors and contractors), ensuring health and safety of weatherization workers and clients, and reducing the potential for waste, fraud and abuse are the overall goals of a comprehensive T&TA program.

In 2023, DHS contracted with James Correira as a "Training and Technical Assistance Consultant" to help frame, guide and support RI's T&TA efforts. Mr. Correira has been instrumental in his analysis of existing T&TA resources and other engagement opportunities. PY24 T&TA goals include but are not limited to:

- Energy Auditor Certification Training (BPI)
- EPA Certified Renovator Training
- Quality Control Inspector (QCI) Training (BPI)
- Health and Safety training, including ASHRAE 62.2 2016,
- Hancock HEAT Training - New Users and Refresher Training

in PY24, DHS plans to develop a system for tracking training effectiveness that will seek to include both qualitative and quantitative data reflective of improvements in network capacity and knowledge in each identified training area.

State Technical Monitors

All state monitors have received extensive training in all aspects of weatherization including:

- BPI Building Analyst Professional Certification
- QCI Training and Certification
- Advanced blower door/pressure diagnostics training
- Combustion Safety/Worst Case Scenario training
- Thermal Imaging Camera training
- Certified Lead Renovator
- ASHRAE 62.2 2016
- Advanced Air Sealing training
- HEAT audit training

Observations of trends during field monitoring are a determining factor in developing Single Topic training opportunities. Trends are also discovered in the "Hancock State Approval" process and weekly staff meetings.

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STATE PLAN / MASTER FILE WORKSHEET
Grant Number: EE0009929, **State:** RI, **Program Year:** 2024
Recipient: State of Rhode Island

DHS has implemented weekly WAP monitoring meetings to review and track field and QCI reports. State monitors will provide copies of any field reports, post inspections, or QCI inspection reports and an overview of their findings. These reports will be tracked on a spreadsheet to identify auditor, agency, and contractor issues and trends. This feedback is also beneficial to other state monitors who may be facing similar issues and concerns with their agencies. DOE monitoring observations and recommendations are also factored into the development of RI's annual T&TA plan.

Attendance for all training is tracked in a database maintained by DHS. The database is also used to track renewals for licenses and certifications. Refer to "Qualifications and Certifications", uploaded to the SF-424.

DHS technical monitors use diagnostic equipment as a means to monitor weatherization work and train Subgrantee energy auditors and weatherization contractors. Infrared cameras, blower doors, gas leak detectors and combustion and carbon monoxide detectors are required and used extensively in monitoring of WAP. These tools are necessary to evaluate the quality of weatherization work and assess health and safety concerns of the home. All Subgrantees are required to have blower doors and have been trained on its proper use. In addition, Subgrantees are required to use combustion efficiency test equipment, carbon monoxide detectors and gas leak detectors to help ensure health and safety concerns regarding combustion appliances are addressed. All subgrantees also have multiple infrared cameras to be used in conjunction with blower door testing to identify air leakage areas and as a quality assurance tool to verify that wall, slope and ceiling insulation and air sealing work was completed properly.

DHS has developed a comprehensive "Site Assessment Process" document to serve as a guide for conducting audits and final inspections. Every energy auditor has received training on the SAP document, and new hires will be required to receive SAP training before conducting audits or final inspections on their own. A copy of the Site Assessment Process document has been uploaded to the PAGE Document Library.

Energy Auditors

All energy auditors are required to have BPI Building Analyst Certification before performing any energy audits on their own. Throughout PY 24, energy auditors and state monitors will attend HEP Energy Auditor training as needed.

Weatherization Auditor Requirements

1. BPI Building Analyst certification is required to perform audits for the RI WAP/IES program, unless prior approval has been obtained by DHS.
2. Rhode Island Lead Safe Renovator Remodeler certification (RRP) is required to perform audits for the RI WAP/IES program.
3. All energy auditors must have OSHA 10 certification.
4. All RI WAP/IES Weatherization Auditors must pass the RI Energy Background Check
5. Auditors must possess and maintain proper use of all "Required Tools for Weatherization Auditors" listed in the RI WAP Operations Manual.

Quality Control Inspectors

A Quality Control Inspector (QCI Inspector) is an evaluator who verifies the work performed against the work plan, specifications and standards, performs building diagnostics, records/reports findings and concerns, and specifies corrective actions; by conducting a methodological audit/inspection of the building, performing safety and diagnostic tests, and by observing the retrofit work; in order to ensure the completion, appropriateness and quality of the work providing for the safety, comfort, and energy savings of the building occupants.

Quality Control Inspector (QCI) Requirements for DOE Funded Work

Quality Control Inspectors must be certified as Home Energy Professional Quality Control Inspectors for all DOE inspections.

There are 15 QCI inspectors in RI at this time. DHS will not limit the number of auditors that can receive the EA and QCI training and certification. To the greatest extent possible, LIHEAP funds will be used to supplement T&TA activities where DOE funding falls short.

RI WAP Implementation Plan for WPN 22-4

DOE WPN 22-4 describes requirements to support and verify quality work in the Department of Energy's (DOE) Weatherization Assistance Program (WAP). It defines what constitutes a quality installation of weatherization measures, outlines how those measures are inspected and validated, and prescribes acceptable training and credentialing of workers.

Due to the technical and changing nature of the Weatherization Assistance Program (WAP), a high priority has been placed on the training aspect of the

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

If funding allows, RI will also offer HEP Crew Leader and Retrofit Installer training and certification to eligible RI WAP contractors. Contractors will be required to sign a retention agreement with the Subgrantee. The retention agreement shall require that contractors will work in the program for a specific amount of time, and must align with the cost of the T&TA provided.

Subgrantees are provided T&TA funds with their HHS WAP and DOE Contracts. Subgrantees are required to utilize these resources to maintain and improve program operations across all levels of RI WAP. The Subgrantee is responsible for tracking the compliance of its auditors with training requirements. Travel to attend training, is to be budgeted and charged to either the T&TA or administrative categories. Out-of-state travel for Subgrantee personnel requires prior written approval by DHS.

Training for all WAP workers (aligned with the NREL JTA for the position in which the worker is employed) will be phased in. In PY24, "Comprehensive" training will be focused primarily on EA and QCI training and certification for all energy auditors and state monitors. If a mandatory training is missed, the individual must re-schedule the training on their own, or take the class/course online. DHS will determine what trainings are mandatory. Attendance for all training is tracked.

Comprehensive Training (formerly called Tier 1 training)

Comprehensive training is occupation-specific training which follows a curriculum aligned with the JTA for that occupation. Comprehensive training must be administered by, or in cooperation with, a training program that is accredited by a DOE-approved accreditation organization for the JTA being taught. All DOE funded Comprehensive training will be provided by DOE-approved accredited training programs. Accredited training can be administered in a number of ways including traveling training programs, distance learning programs and other options approved by DOE. All Weatherization field staff may receive regular Comprehensive training. Trainings will be based on an analysis of training needs and a plan for meeting those needs over a defined period of time, which can span multiple Program Years.

Specific Training (formerly called Tier 2 training)

Specific Training is single-issue, short-term, training to address acute deficiencies in the field such as dense packing, ASHRAE 62.2 2016, etc. Conference trainings are included in this category. DHS will initiate Specific Training from time to time. These trainings can take place in the field, at a Subgrantee office, college or technical school or other locations.

DHS will also assess Subgrantee and contractor compliance with OSHA requirements. All crew/contractor leaders/supervisors are required to attend a 30-hour OSHA construction training and must attend future trainings to maintain currency as indicated by OSHA. Subgrantees may utilize their T&TA funds to attend necessary trainings to comply with this and other requirements and to monitor their contractors to ensure this requirement is being followed.

DHS plans to provide non-technical or administrative/financial training to all 6 Subgrantees in PY24. Potential topics include: Historic Preservation training (working with state SHPO office); financial training (working with NASCSP); WAP Litmos, and RI Operations Manual training (DHS).

Education and Outreach

The final component of our T&TA objectives is client education and outreach. This critical component enables DHS to learn directly from our clients how satisfied they are with the work performed and also enables our state monitors to follow up on client education about reducing their energy consumption. All RI WAP customers are provided with a self-addressed and stamped "Client Satisfaction Card" at the post inspection. All customers are given the customer satisfaction card, regardless of the funding source. CLEAResult compiles all responses on a spreadsheet, and shares results with DHS and Subgrantees. At the final inspection, the customer is given a copy of the Hancock Energy Savings Report for the weatherization work completed. Each energy auditor has a portable printer and Ipad for convenience in providing this important report.

In addition, client education packets have been provided to all Subgrantees and include materials such as: *The Lead Safe Certified Guide to Renovate Right (required for every weatherization job)*; *Brief Guide to Mold and Moisture and the Home*; *Save Energy on Your Own*; *Top 10 Ways Homeowners Can Ensure Good Air Quality*; *EPA's Citizen's Guide to Radon*; *Asbestos Safety Information*; *Top 20 Asbestos Questions*; *An Overview of Domestic Hot Water Tanks*; *Electrical Safety Workbook and Seven Tips for Keeping a Healthy Home*. These materials will be distributed to customers as needed, and are included as an Appendix to the RI WAP Operations Manual. Other client education materials will be added or updated to the materials portfolio as necessary.

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DHS does not collect data on actual energy savings. Subgrantee effectiveness is determined by reviewing monthly production, in-field technical monitoring observations, annual monitoring, WTC meetings, job cost reports, customer survey cards, and more. T&TA activities are developed based on these elements, and are usually mandatory for all energy auditors and state monitors.

DHS will develop and submit as required an Annual Training and Technical Assistance Report which describes the T&TA activities covered during the grant period.

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:	70.0
Percent of budget allocated to Crew/Installer trainings:	20.0
Percent of budget allocated to Management/Financial trainings:	10.0

V.9 Energy Crisis and Disaster Plan

Energy Crisis Relief (ECR)

DHS will comply with WPN 12-7: "Revised Guidance on Weatherization Disaster Guidance and Relief". Rhode Island currently utilizes LIHEAP funds for our Energy Crisis Relief (ECR) program. The activities and measures that will be performed under ECR are, but not limited to, repair of heating systems, replacement of irreparable heating systems, repair of gas or other fuel lines, pipe thawing service, and loans of auxiliary heaters. Because of LIHEAP and NGRID funding for emergency boiler repair and replacement, DHS does not anticipate the need to use DOE WAP funds for an emergency crisis program.

Weatherization Grantee Health and Safety (H&S) Plan- *Optional Template* **Rhode Island**

1.0 – GENERAL INFORMATION

Additional information that does not fit neatly in one of the other sections of this document.

Rhode Island's Weatherization Program Operations Manual (OM) addresses Health and Safety (H&S) in accordance with 10CFR 440.16(h), 440.18(d)(15), 440.21(5), and the Department of Energy's (DOE) most recent Health and Safety Guidance in Weatherization Program Notices (WPN) 22-7 and the current SWS-aligned RI Weatherization Field Guide.

Rhode Island's Department of Human Services (DHS) budgets health and safety costs as a separate category from Program Operations and, thereby, excludes such costs from the Savings to Investment Ratio (SIR) and the average cost per-unit (ACPU) calculation.

Allowable energy efficiency-related health and safety actions are those actions necessary to maintaining the physical well-being of both the occupants and/or weatherization workers where:
 Costs are reasonable and are in accordance with Rhode Island's approved State Plan; and
 The actions must be taken to effectively perform weatherization work, or
 The actions are necessary as a result of weatherization work.

Not all observed health and safety conditions need to be corrected in order to proceed with weatherization; however, the client will still be notified of any observed conditions and if the condition is not corrected, it should be clearly explained in the client's electronic file in Hancock how the condition is not related to the planned weatherization work.

Waivers must be submitted to DHS State Monitors for approval when the total H&S cost is over \$900/unit for DOE WAP funding. H&S practices must be performed within the guidance of the RI WAP H&S Plan, but certain discretion is left to the auditor in estimating costs and making judgments for deferral.

2.0 – BUDGETING

Grantees are encouraged to budget H&S costs as a separate category and, thereby, exclude such costs from the Average Cost Per Unit (ACPU) cost limitation. This separate category also allows these costs to be isolated from energy efficiency costs in program evaluations. H&S costs that 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 Grantee's Department of Energy (DOE)-approved energy audit tool.

Select which option used below.

Separate H&S Budget

Contained in Program Operations

3.0 – H&S EXPENDITURE LIMITS

Pursuant to [10 CFR 440.16\(h\)](#), Grantees must establish H&S expenditure limits for their Program and provide justification for those limits by explaining the basis and related historical H&S expenditures. DOE acknowledges that it may be necessary for Grantees to deviate from historical expenditures when certain circumstances arise (e.g., funding source changes).

[10 CFR 440.16\(h\)\(2\)](#) dictates that these limits must be expressed as a percentage of the ACPU. To calculate this percentage, use the following formula:

$$\text{Total Average H\&S Cost per Unit} = \frac{\text{H\&S budget amount}}{\text{Program Operations budget amount}}$$

For example, if the ACPU is \$5,000 and a Grantee’s Program expends an average of \$750 per dwelling on energy-related H&S measures, the Total Average H&S Cost per Unit would equal 15 percent. DOE acknowledges that this percentage may vary significantly between Grantees due to different geographical areas and depending upon the availability of other funding sources, resource availability, etc. Low percentages should include a statement of what other funding supports H&S costs, while larger percentages will require greater justification and relevant historical support.

15 percent is not a maximum limit on H&S expenditures. DOE will conduct a secondary level of review on H&S Plans with a Grantee request of more than 15 percent of Program Operations used for H&S purposes. **DOE strongly encourages using the table below in developing justification for the requested H&S budget amount.** In accordance with [10 CFR 440.18\(d\)\(15\)](#), these funds are to be expended by the Program in direct weatherization activities, “of which is necessary before, or because of, installation of weatherization materials.” This same section of the regulation excludes the H&S costs from the ACPU limitation if H&S costs are budgeted separately.

DOE recommends reviewing recent budget requests and compare those to actual H&S 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 annual plan.

H&S expenditure limits and justification explaining the basis for setting the limits.

Please refer to Measure Matrix. The information utilized was for the period 1/1/23 – 12/31/23.

Utilizing the spreadsheet embedded below, provide a full list of H&S measures using historical data from your program, including average cost, and frequency rate. If installing more than a single instance of one measure in a unit (e.g. multiple CO alarms), Grantees may aggregate costs so that frequency does not exceed 100%, or enter a justification into the measure column, which explains why that measure has a frequency rate of over 100%. The spreadsheet will auto calculate your expected Total Average H&S Cost per Unit.

Instructions: Double-click icon directly below to open, view and edit Measure Matrix Spreadsheet. Complete the spreadsheet by entering the required information. To save, close the spreadsheet and it will save to this document.



2023 H&S
Worksheet - final.xls

4.0 – INCIDENTAL REPAIR MEASURES

Any measures that could potentially be identified as H&S, but the Grantee chooses to instead identify and treat those measures as incidental repair measures (IRMs), must be implemented consistently throughout the Grantee’s weatherization program. The measure must fit the regulatory definition of an IRM and be cost justified along with the associated energy conservation measure and/or package of measures. [10 CFR 440.3](#) defines Incidental Repairs as, “those repairs necessary for the effective performance or preservation of weatherization materials.”

H&S measures identified and treated as IRMs within your Program.

List any H&S measures from the Table of Issues which are instead addressed as IRM with DOE WAP Funds

5.0 – OCCUPANT PRE-EXISTING OR POTENTIAL HEALTH CONDITIONS AND HAZARD IDENTIFICATION AND NOTIFICATION FORM(S)

Grantees must develop a written policy that includes, at a minimum, the following documentation relating to H&S Plan implementation and maintain signed copies in each client file. Each notification must include the occupant(s) (and landlord if applicable) name and address, be signed and dated by the occupant (and landlord if applicable) indicating that they understand and have been informed of their rights and options and signed by the Subgrantee personnel collecting the information.

Required topics are:

▪ **Occupant Pre-existing or Potential Health Condition Screening**

- Provides documentation that allows occupant(s) to self-report known or suspected health concerns as part of initial application for weatherization, during the energy audit, or other part of the weatherization process as specified. Must minimally contain the following:
 - Any known risks associated with the measures and materials being installed
 - Subgrantee point of contact information for occupant(s)
 - Date of screening

▪ **Hazard Identification Notification**

- Provides documentation that the occupant and landlord (if applicable), have been informed of any potential hazards identified during the energy audit or intake process. Must minimally contain the following:
 - Date(s) of the energy audit/assessment and when the occupant(s) (and landlord, if applicable) was informed of a potential H&S issue
 - A clear description of the problem, including any testing results
 - A statement indicating if, or when weatherization could continue

Radon Informed Consent Form

- Provides documentation that the occupant(s) (and landlord if applicable) have been informed of any potential hazards associated with radon in weatherized dwellings. The form must minimally contain the following:
 - An explanation on the potential small risk of increasing radon levels when building tightness is improved. This is based on the results of the [Buildings Assessment of Radon Reduction Interventions with Energy retrofits Expansion Study \(The BEX Study\)](#)
 - A list of precautionary measures WAP will install based on [EPA Healthy Indoor Environment Protocols](#).
 - Some of the benefits of Weatherization including energy savings, energy cost savings, improved home comfort, and increased safety.

Procedure for soliciting occupants’ health and safety concerns related to components of their homes

Customer signs RI WAP Audit Instructions and RI WAP Liability Disclaimer. Both forms have been uploaded to the PAGE Document Library and SF424.

Procedure for determining whether occupants suffer from health conditions which may be negatively impacted by the act of weatherizing their dwelling	
Refer to RI WAP Audit Instructions	
Procedure for addressing potential health concerns including pre-existing health conditions when they are identified	
All health concerns should be brought to the attention of the Subgrantee Weatherization Coordinator and DHS. Depending on the severity of the issue, deferral may be necessary.	
Location where forms have been uploaded/submitted	
Separate attachment to SF424 <input checked="" type="checkbox"/>	Separate attachment to H&S Plan <input type="checkbox"/>

6.0 – HEALTH AND SAFETY CATEGORIES

For each of the following H&S categories identified by DOE in the following tables, follow the directions below.

- Any section that is “Required” below must be explicitly detailed in the H&S Plan regardless of funding source used. If the Grantee checks the box for “Concurrence with DOE Guidance” the contents of the box may be left as it exists or reference the section/location within Grantee Policy and Procedure manual that contains language or insert Grantee specific language. If the “Alternative Guidance” box is checked, the Grantee must provide that alternative guidance in the box.
 - If a Grantee is proposing an alternative action/allowability for a “Required” item, the alternative requires comprehensive explanation of how it meets the intent of the DOE program notice.
 - If a “Required” item/category will not be addressed with any funding source and will always result in deferral, the H&S Plan must state that.
- Any section that is “Allowable” below must be detailed only if DOE WAP funds are used to implement the measures. If the Grantee uses DOE funds for any “Allowable” activities from the Table of Issues then they must be described here in detail, including defining “minor”, “major”, “limited”, “case-by-case”, and “at-risk” if the term is applied. If you only check the box “Allowed with Alternative Funds” then no additional information is required.
- Any section that is “Prohibited” below may not be addressed with DOE WAP H&S funds and does not need to be specifically addressed in the H&S Plan. The Grantee simply needs to check the “Concur with DOE guidance” box and indicate if the condition will result in deferral/referral.
- The Grantee H&S Plan may address additional H&S hazards specific to their program that are not included in the Table of Issues. If a Grantee chooses to include additional measures as DOE WAP funded H&S costs, the H&S Plan must include details pertaining to the measures allowed, testing required, and client education for these specific hazards.
- All required “Testing/Inspection” related items must be documented in the client file to verify completion and results.

6.1 – Air-Conditioning, Heating Systems, and Combustion Appliances

Required Actions

Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>		Alternative Funds <input checked="" type="checkbox"/>

- Replace, repair, or install primary heating systems when existing primary heating systems are unsafe, inoperable, or nonexistent. No home may be left without a safe primary heating system after weatherization where climate conditions require heating (i.e., all climate zones except zone 1 as defined by ASHRAE). If unable to meet this requirement, deferral is required.
- No DOE-funded weatherization work is permitted if the completed dwelling unit will be heated with an unvented combustion space heater as the primary heat source. The primary heat source must be replaced with a vented unit prior to or by weatherization. The replacement unit must be sized to heat the entire dwelling unit.
- Unsafe secondary units, including space heaters, must be repaired, or removed and disposed of, or deferral is required. Secondary unvented space heaters are considered unsafe if they:
 - are not listed and labeled as meeting ANSI Z21.11.2;
 - have an input rating of more than 40,000 BTU/hour;
 - are in a bedroom and have an input rating of more than 10,000 BTU/hour;
 - are in a bathroom and have an input rating of more than 6,000 BTU/hour;
 - are operating in an unsafe manner (e.g., high carbon monoxide (CO) readings, too close to combustible materials, lack sufficient combustion air volume);
 - or are not permitted by the Authority Having Jurisdiction (AHJ).
- DOE WAP Grantees must comply with the Manufactured Home Construction and Safety Standards which mandates that:
 - All fuel-burning appliances in manufactured homes except: ranges, ovens, illuminating appliances, clothes dryers, solid fuel-burning fireplaces and solid fuel-burning stoves, must be installed to provide for the complete separation of the combustion system from the interior atmosphere of the manufactured home (i.e., to draw their combustion air from outside), and be vented to outside the dwelling.
 - All appliances installed by or left in place after weatherization in manufactured homes must meet these standards, including secondary heating sources. If an occupant will not allow the removal of an unsafe combustion appliance from the home, deferral is required.
 - Repair or replace combustion gas venting to ensure proper combustion gas venting to outside the dwelling for all combustion appliances, including but not limited to gas dryers and refrigerators, furnaces, vented space heaters, and water heaters.
- If weatherization installs an appliance that is vented into a masonry chimney, the chimney must be lined in compliance with the International Fuel Gas Code (IFGC) or local AHJ if more stringent.
- Install adequate combustion air for all combustion appliances left after weatherization.
- If permits are required for heating/cooling system work, they must be secured and are a program operation cost if the installation is an ECM or may be included in the H&S cost if installed as a H&S measure.
- If unsafe conditions relating to existing combustion appliances require remediation to safely perform weatherization and cannot be remedied by repair or tuning, replacement is an allowable H&S measure unless prevented by other guidance herein.
- Documentation justifying the replacement with a cost comparison between replacement and repair must be maintained in the client file.

Allowable Actions

Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>
--------------------------------------------------------------------	--------------------------------------------------------------------

If DOE WAP H&S funds are used for any “allowable” actions, detail them here.

Prohibited Actions	
Concur with DOE Guidance <input checked="" type="checkbox"/>	
Using DOE WAP H&S funds for replacement or installation of secondary heat sources is prohibited.	
Required Testing/Inspection	
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
<ul style="list-style-type: none"> • Verify that primary heating systems are present, operable, and performing correctly. • Conduct combustion appliance testing and visual inspection of all combustion appliances and their related venting. • Depressurization and spillage testing is required for all Category 1 appliances pre- and post-weatherization and before leaving the home on any day when work has been done that could affect draft (e.g., air or duct sealing, adding exhaust ventilation). • CO testing is required for all combustion appliances, regardless of venting type. • Verify proper clearances for all combustion venting types • Visually inspect the entirety of solid fuel-fired appliance installations (e.g., wood stoves, coal stoves, pellet stoves, fireplaces) including the venting system to ensure it adheres to the applicable code or local authority having jurisdiction. Appliances must be inspected pre- and post-weatherization. • Conduct pre- and post- weatherization worst case CAZ depressurization testing in spaces having a fireplace or woodstove. Since there is no consensus method for verifying safe operation of fireplaces and woodstoves, Grantees can propose testing policies and limits. If the Grantee does not propose a policy and fireplaces or woodstoves are left operational, the vent must meet national or local codes, or the home cannot be weatherized. • Safety inspections related to space heaters, fireplaces, and woodstoves must include, but not be limited to, verification of adequate floor protection, and code-compliant clearances to walls and other combustible materials. 	
Grantee Combustion Testing Action Levels	
Describe the Grantee policy and actions based on the results of depressurization, spillage, and CO measurements taken during combustion testing for all combustion appliances.	
Grantee Woodstove & Fireplace inspection/testing policy including actions/limits	
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
Fireplace or woodstove venting that is left operational after weatherization must meet current local or national standards or the home must be deferred.	
Required Occupant Education	
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
<ul style="list-style-type: none"> • Appropriate use and maintenance of units. • Provide all paperwork and manuals for any equipment installed by weatherization. • Discuss and provide information on proper disposal of bulk fuel tanks when not removed as part of the weatherization work. • Where combustion equipment is present, provide combustion safety and hazards information including how to recognize depressurization, dangers of CO poisoning, and fire risks associated with combustion appliance use. 	

6.2 – Asbestos (Confirmed and/or Presumed Asbestos Containing Material)

Required Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>	

- When suspected friable Asbestos Containing Materials (ACM) are present, including vermiculite, assume they contain asbestos and take precautionary measures to prevent disturbing it during the audit and work unless testing determines otherwise.
- Grantees must have written policy included in their H&S plan for:
 - Identifying and managing suspected ACM that provides for reasonable and necessary precautions to prevent asbestos contamination in the home.
 - Addressing blower door testing where suspected friable ACM is present (as defined by EPA), including vermiculite.

Grantee ACM policy

Assume that friable asbestos is present in old, grey-colored heating system, pipe and duct insulation. "Friable" means the material can be crumbled, pulverized, or reduced to powder by the pressure of an ordinary human hand.

- When suspected friable ACM is present, take precautionary measures as if it is asbestos unless testing determines otherwise.
- RI subgrantees must not perform a blower door depressurization test in a building where friable asbestos or vermiculite are present. "Friable" means the material can be crumbled, pulverized, or reduced to powder by the pressure of an ordinary human hand. Where friable asbestos or vermiculite is present, the auditor should use a blower door estimate.
- When deferral is necessary due to asbestos, occupant must provide documentation that a certified professional performed the remediation before work continues.

When deferral is necessary due to asbestos, occupant must provide documentation that a certified professional performed the remediation before work continues.

Grantee Blower Door Testing Policy When Suspected ACM Exists

RI subgrantees must not perform a blower door depressurization test in a building where friable asbestos or vermiculite are present. The auditor should use a blower door estimate or perform the blower door test in pressurized mode.

Allowable Actions

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

WRF funds may be used for asbestos removal, including vermiculite, to correct a deferral

Prohibited Actions

Concur with DOE Guidance

Using DOE WAP H&S funds for general abatement/removal/or replacement of asbestos siding, thermal system insulation (TSI) or Transite, or vermiculite is prohibited.

Required Testing/Inspection

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

- Visually inspect all surfaces (i.e., walls, floors, ceilings, roofs) for suspected ACM prior to drilling or cutting.
- Assume asbestos is present in suspect materials unless testing reveals otherwise.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.

Required Occupant Education

Concur with DOE Guidance

Alternative Guidance

- Formally notify the occupant, and landlord if applicable, in writing:
 - of suspected ACMs that are present and what precautions will be taken to ensure the occupants' and workers' safety during weatherization;
 - of results if testing was performed;
 - not to disturb suspected ACM;
 - When deferral is necessary due to asbestos, occupant, or landlord if applicable, must provide documentation that a certified professional performed the remediation before work continues.

6.3 – Biologicals and Unsanitary Conditions

Required Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input checked="" type="checkbox"/>
DOE WAP H&S Funds <input type="checkbox"/>	Alternative Funds <input type="checkbox"/>	
Deferral where conditions (odors, bacteria, raw sewage, rotting wood, etc.) in the home pose a health risk to occupants and/or weatherization workers or may be worsened by weatherization activities (e.g., air sealing) and will not be resolved by weatherization.		
Allowed Actions		
Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>	
WRF funds may be used to correct a deferral		
Required Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input checked="" type="checkbox"/>
DOE WAP H&S Funds <input type="checkbox"/>	Alternative Funds <input type="checkbox"/>	
Sensory inspection of interior, exterior, attics, and subspaces of the dwelling.		
Prohibited Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
DOE WAP H&S funds may not be used for testing of materials for biological contaminants.		
Required Occupant Education		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	
Inform occupant in writing of observed biological and unsanitary conditions.		

6.4 – Building Structure and Roofing (e.g., roofing, wall, foundation)

Allowable Actions		
Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>	
WRF funds may be used to correct a deferral		
Prohibited Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
Using DOE WAP H&S funds for <i>major</i> repairs as defined by Grantee's H&S Plan. Using DOE WAP H&S funds for building rehabilitation is prohibited		
Define "major" repairs		
A major repair is considered to have a total cost greater than \$1,000 and requires prior approval.		
Required Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input checked="" type="checkbox"/>
DOE WAP H&S Funds <input type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>	
Visual inspection of building structure and roofing for damages that compromise building durability and to verify that portions of the home where weatherization will occur are safe for entry and performance of assessments, work, and inspections.		

Allowable Testing/Inspection	
Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>
If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.	
Prohibited Testing/Inspection	
Concur with DOE Guidance <input checked="" type="checkbox"/>	
Using DOE WAP H&S funds for any testing/evaluation of structural materials by a third-party is prohibited.	
Required Occupant Education	
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
Notify occupant in writing of structurally compromised areas.	

6.5 – Code Compliance		
Allowable Actions		
Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>	
If DOE WAP H&S Funds are used for any “allowable” actions, detail them here.		
Prohibited Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
<ul style="list-style-type: none"> Using DOE WAP H&S funds for correction of preexisting code compliance issues not directly related to the installation of specific weatherization measures in the home is prohibited. Using DOE WAP funds for work on condemned properties and properties where H&S conditions exist that cannot be corrected under this guidance is prohibited 		
Required Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input checked="" type="checkbox"/>
DOE WAP H&S Funds <input type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>	
Visual inspection.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.		
Required Occupant Education		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	
Inform occupant in writing of observed code compliance issues when it results in a deferral.		

6.6 – Electrical		
Required Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input checked="" type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>	
Provide sufficient over-current protection and damming prior to insulating building components containing knob and tube wiring, as required by the AHJ.		
Allowable Actions		
Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>	
WRF funds may be used to remove knob and tube wiring if the presence of the wiring would lead to deferral of weatherization services. Subgrantees must submit a waiver to DHS requesting the use of WRF funding with supporting documentation which includes a completed K&T Inspection Report and a written estimate from a licensed electrical contractor.		
Prohibited Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>		

Using DOE WAP H&S funds for *major* electrical repairs as defined by the Grantee’s H&S plan is prohibited

Define “major” repairs

An electrical repair is considered major if it exceeds \$10,000. Where electrical repairs exceed \$10,000, alternative funds (LIHEAP, utility) may be utilized if funding is available, and with prior approval.

Required Testing/Inspection

Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input checked="" type="checkbox"/>
DOE WAP H&S Funds <input type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>	

- Visual inspection for presence and condition of knob-and-tube wiring.
- Evaluate knob-and-tube wiring for safety prior to work.
- Check for alterations that may create an electrical hazard.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>
---------------------------------------------------------	--------------------------------------------------------------------

If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.

Required Occupant Education

Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
--------------------------------------------------------------	-----------------------------------------------

- Provide occupant with written documentation of any electrical hazards identified that will not be addressed by weatherization
- Provide information to occupant on over-current protection, overloading circuits, and basic electrical safety/risks if conditions warrant.

6.7 – Fuel Leaks

Required Actions

Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input checked="" type="checkbox"/>
DOE WAP H&S Funds <input type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>	

- When a gas leak is found on the utility side of service, the utility service must be contacted, work must be temporarily halted, and the leak must be repaired before work may proceed.
- Fuel leaks that are the responsibility of the occupant (vs. the utility) must be repaired before installing weatherization measures in the home.

Allowable Actions

Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>
---------------------------------------------------------	--------------------------------------------------------------------

To prevent deferrals, WRF funds may be used for minor gas line leak repairs and for oil tank replacements if the system will remain after weatherization.

Prohibited Actions

Concur with DOE Guidance <input checked="" type="checkbox"/>

- Using DOE WAP H&S funds to repair leaks that are the responsibility of the utility to correct is prohibited.
- Using DOE WAP H&S funds for environmental cleanup resulting from bulk fuel leaks is prohibited

Required Testing/Inspection

Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input checked="" type="checkbox"/>
DOE WAP H&S Funds <input type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>	

- Test all exposed gas lines, fittings, valves, and connections for fuel leaks from utility connection to the appliance throughout the home.
- Test all gas appliances for fuel leaks at all connections, valves, fittings, and burners.
- Conduct sensory inspection of all bulk fuels lines and storage tanks to determine if leaks exist.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>
---------------------------------------------------------	--------------------------------------------------------------------

If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.	
Prohibited Testing/Inspection	
Concur with DOE Guidance <input checked="" type="checkbox"/>	
Using DOE WAP H&S funds for environmental testing of soil or water is prohibited.	
Required Occupant Education	
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
Inform occupants in writing of fuel leak testing results, including specific location if fuel leaks are detected.	

6.8 – Gas Ovens/Stovetops/Ranges

Allowable Actions		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>	
If DOE WAP H&S Funds are used for any “allowable” actions, detail them here.		
Prohibited Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
Using DOE WAP H&S funds for replacement of gas ovens/ranges/stovetops is prohibited.		
Required Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input checked="" type="checkbox"/>
DOE WAP H&S Funds <input type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>	

- Test gas ovens for CO.
- Grantee H&S plan must define action levels and resulting actions.
- Visually inspect cooking burners and ovens for operability and flame quality.

Define action levels for oven CO testing and resulting actions

Per BPI-1200 standard section 7.9.7 gas ovens shall be tested, and range top burners shall be visually inspected. Testing procedures must follow manufactures' specifications.

Central Furnace (all categories)	400 ppm air free
Boiler	400 ppm air free
Floor Furnace	400 ppm air free
Gravity Furnace	400 ppm air free
Wall Furnace (BIV)	200 ppm air free
Wall Furnace (direct vent)	400 ppm air free
Vented Room Heater	200 ppm air free
Unvented Room Heater	200 ppm air free
Water Heater	200 ppm air free
Oven/Broiler	225 ppm as measured
Top Burner	25 ppm as measured
Clothes Dryer	400 ppm air free
Refrigerator	25 ppm as measured
Gas Log (gas fireplace)	25 ppm as measured in vent
Gas Log (installed in wood burning fireplace)	400 ppm air free in firebox
RI WAP Threshold for DHW and Heating Systems*	100 ppm air free

***RI WAP supersedes BPI-1200 for CO threshold limits on DHW and Heating Systems.**

Allowable Testing/Inspection	
Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>
If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.	

Required Occupant Education	
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
Inform occupants of the importance of using exhaust ventilation when cooking and the importance of keeping burners and broilers clean to limit the production of CO.	

6.9 – Hazardous Materials

Required Actions

Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input checked="" type="checkbox"/>
DOE WAP H&S Funds <input type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>	

- Hazardous Waste Materials generated by weatherization work (e.g., refrigerant, asbestos, lead, mercury, CFL lighting bulb/ballasts, etc.) must be disposed of according to all local and federal laws, regulations, and guidelines, as applicable. Costs specifically related to disposal may be charged as a H&S expense.
- Subgrantees must document disposal requirements in contract language with the responsible party.
- Limited** removal of pollutants that pose a risk to workers is required (e.g., flammable liquids, hazardous chemicals, and other air pollutants) as defined the Grantee’s H&S Plan.
- If removal cannot be performed or is not allowed by the occupant, the unit must be deferred.

Define “limited” removal of pollutants

Define “limited” removal of pollutants using a quantifiable methodology.

Allowable Actions

Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
If DOE WAP H&S Funds are used for any “allowable” actions, detail them here.	

Prohibited Actions

Concur with DOE Guidance <input checked="" type="checkbox"/>
Using DOE WAP H&S funds for Lead, Asbestos, and Radon abatement is prohibited.

Required Testing/Inspection

Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input checked="" type="checkbox"/>
DOE WAP H&S Funds <input type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>	

Sensory inspection.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.	

Prohibited Testing/Inspection

Concur with DOE Guidance <input checked="" type="checkbox"/>
Using DOE WAP H&S funds for any testing for hazardous materials other than that specifically permitted in the asbestos, lead, and radon sections of this document is prohibited.

Required Occupant Education

Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
--------------------------------------------------------------	-----------------------------------------------

- Inform occupant in writing of hazards associated with hazardous waste materials being generated/handled in the home.
- Inform occupant in writing of observed hazardous condition and associated risks.
- Provide occupant written materials on safety issues and proper disposal of household pollutants.

6.10 - Injury Prevention of Occupants

Allowable Actions

Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>
---------------------------------------------------------	--------------------------------------------------------------------

If DOE WAP H&S Funds are used for any “allowable” actions, detail them here.		
Prohibited Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
Using DOE WAP H&S funds for <i>major</i> repairs, as defined by the Grantee’s H&S Plan is prohibited		
Define “major” repairs		
Define the term “major” repairs using a quantifiable methodology.		
Required Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input checked="" type="checkbox"/>
DOE WAP H&S Funds <input type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>	
Visually inspect for dangers that would prevent weatherization.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>	
If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.		
Required Occupant Education		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	
If identified hazardous conditions will not be corrected during weatherization, inform occupant in writing of observed hazards and associated risks utilizing the “Hazard Identification Notification Form” required by WPN 22-7.		

6.11 – Lead-Based Surface Coverings (Paint, Varnishes, Roofing, etc.)

Required Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>	
<ul style="list-style-type: none"> • Subgrantees must comply with EPA’s Lead; Renovation, Repair and Painting Program (RRP) rules when working in pre-1978 housing unless testing confirms the work area to be lead free. This includes, but is not limited to: <ul style="list-style-type: none"> ○ Client file documentation including the Certified Renovator’s certification; any training provided on-site; description of specific actions taken; lead testing and assessment documentation; and photos of site and containment set up. Include the location of photos referenced if not in file. ○ Certification and training requirements of the RRP rule. ○ Job site set up and cleaning verification by a Certified Renovator. • Only those costs directly associated with lead safe work practices for surfaces directly disturbed during weatherization activities are allowable WAP H&S expenses. 		
Allowable Actions		
Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>	
If DOE WAP H&S Funds are used for any “allowable” actions, detail them here.		
Prohibited Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
<ul style="list-style-type: none"> • Using DOE WAP H&S funds for lead abatement is prohibited. • Using DOE WAP H&S funds for purchase, resourcing, or maintenance of X-ray Fluorescence (XRF) devices is prohibited. 		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>	
If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.		
Required Occupant Education		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	
Follow pre-renovation education requirements per EPA RRP rules.		

6.12 – Mold and Moisture

Allowable Actions

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

If DOE WAP H&S Funds are used for any “allowable” actions, detail them here.

Prohibited Actions

Concur with DOE Guidance

- Using DOE WAP H&S funds for mold cleanup is prohibited.
- Using DOE WAP H&S funds for window and door replacements is prohibited

Required Testing/Inspection

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

Visual assessment for moisture or mold damage including exterior drainage.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

WRF funds may be used to correct a deferral with prior approval

Prohibited Testing/Inspection

Concur with DOE Guidance

Using DOE WAP H&S funds for mold testing of any type is prohibited.

Required Occupant Education

Concur with DOE Guidance

Alternative Guidance

Provide occupant written notification of identified mold/moisture hazards and information regarding the associated hazard.

6.13 - Occupant Pre-existing or Potential Health Conditions

Required Actions

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

- When a person’s health may be at risk and/or WAP work activities could constitute an H&S hazard, the occupant is required to take appropriate action based on severity of risk.
- Deferral, if occupant risk cannot be mitigated.

Allowable Actions

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

If DOE WAP H&S Funds are used for any “allowable” actions, detail them here.

Required Testing/Inspection

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

- Screen occupants for known or suspected health concerns either as part of initial application for weatherization, during the audit, or both.
- This is done utilizing the “Occupant Pre-existing or Potential Health Condition Screening Form” required by WPN 22-7.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.

Required Occupant Education

Concur with DOE Guidance

Alternative Guidance

- Inform occupant in writing of any known risks and provide pre-weatherization screening form.
- Provide occupant with Subgrantee point of contact information in writing.

6.14 – Pests

Required Actions

Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input checked="" type="checkbox"/>
DOE WAP H&S Funds <input type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>	

Deferral of homes where infestation of pests cannot be reasonably removed or poses H&S concern for workers.

Allowable Actions

Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>
---------------------------------------------------------	--------------------------------------------------------------------

WRF funds may be used to correct a deferral with prior approval

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>
---------------------------------------------------------	--------------------------------------------------------------------

If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.

Required Occupant Education

Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
--------------------------------------------------------------	-----------------------------------------------

Inform occupant in writing of observed conditions and associated risks.

6.15 – Radon

Required Actions

Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>	

- Cover exposed dirt floors within the pressure/thermal boundary with a sealed soil gas retarder
- Cover sump well/pits with airtight covers
- Implement ventilation as required by ASHRAE 62.2-2016

Allowable Actions

Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>
--------------------------------------------------------------------	--------------------------------------------------------------------

- Radon mitigation is not an allowable H&S cost.
- Clients must sign the RI WAP Liability Disclaimer Form prior to receiving weatherization services and a signed copy must be kept in the client file.
- Per WPN 22-7 all units, regardless of radon zone, must receive the precautionary package of radon measures including covering of exposed earth within the pressure/thermal boundary with 6 mil (or greater) polyethylene sheeting, lapped at least 12" and sealed with appropriate sealant at all seams, walls and penetrations; ASHRAE 62.2-16, and covering of open sump pump/pit wells.

Prohibited Actions

Concur with DOE Guidance <input checked="" type="checkbox"/>

Using DOE WAP H&S funds for radon mitigation is prohibited.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
---------------------------------------------------------	---------------------------------------------------------

If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.

Required Occupant Education

Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
--------------------------------------------------------------	-----------------------------------------------

- Provide all occupants EPA’s A Citizen’s Guide to Radon and inform them of radon related risks.
- Occupants must sign an informed consent form prior to receiving weatherization services.

6.16 – Safety Devices: Smoke and Carbon Monoxide Alarms, Fire Extinguishers

Required Actions

Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>		Alternative Funds <input checked="" type="checkbox"/>

Install CO alarms in every home where alarms are not present or are inoperable in compliance with ASHRAE 62.2-2016 which references NFPA 720 (note: NFPA 720 has been incorporated into NFPA 72).

Allowable Actions

Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>
--------------------------------------------------------------------	--------------------------------------------------------------------

- Installation of Smoke/CO detectors is allowed where detectors are not present, inoperable, or beyond the manufacturer’s stated lifetime.
- Auditors are required to test smoke/CO detectors to ensure that they are in working condition.
- Where solid fuel burning equipment is present, fire extinguishers may be provided as an allowable H&S measure.
- Subgrantees must follow all manufacturers' recommendations for proper Smoke/CO detector installations. All Smoke/CO detectors must be installed to meet or exceed all local, state, and federal codes.

Prohibited Actions

Concur with DOE Guidance <input checked="" type="checkbox"/>

Using DOE WAP H&S funds for replacement of functional smoke or CO alarms that are not beyond the manufacturer’s stated lifetime is prohibited.

Required Testing/Inspection

Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>		Alternative Funds <input checked="" type="checkbox"/>

Verify operation and age of installed alarms.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
---------------------------------------------------------	---------------------------------------------------------

If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.

Required Occupant Education

Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
--------------------------------------------------------------	-----------------------------------------------

Provide occupant with verbal and written information on use of newly installed devices and the potential risks of not properly maintaining these devices.

6.17 – Ventilation and Indoor Air Quality

Required Actions

Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>		Alternative Funds <input checked="" type="checkbox"/>

Install ventilation as required by ASHRAE 62.2 - 2016. If occupant refuses ventilation as required by ASHRAE 62.2, the home must be deferred.

Allowable Actions

Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>
--------------------------------------------------------------------	--------------------------------------------------------------------

If DOE WAP H&S Funds are used for any “allowable” actions, detail them here.

Required Testing/Inspection

Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
--------------------------------------------------------------	-----------------------------------------------	-------------------------------------------------------

DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>
<ul style="list-style-type: none"> ASHRAE 62.2 evaluation to determine required post-weatherization ventilation. Measure fan flow of existing fans and of installed equipment to verify performance. 	
Allowable Testing/Inspection	
Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>
If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.	
Required Occupant Education	
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
<ul style="list-style-type: none"> Provide occupant with information on function, use, and maintenance (including location of service switch and cleaning instructions) of ventilation system and components. Provide occupant with equipment manuals for installed equipment. Include disclaimer that ASHRAE 62.2 does not account for high polluting sources or guarantee indoor air quality. 	

6.18 – Water Heaters		
<i>(see Combustion Appliances for combustion related requirements)</i>		
Allowable Actions		
Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input checked="" type="checkbox"/>	
If DOE WAP H&S Funds are used for any “allowable” actions, detail them here.		
Required Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input checked="" type="checkbox"/>	
<ul style="list-style-type: none"> Visual inspection of all water heaters and related piping for safety and leaks See Combustion Appliances section for related combustion safety testing requirements. 		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.		
Required Occupant Education		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	
<ul style="list-style-type: none"> Appropriate use and maintenance of units. Provide all paperwork and manuals for any installed equipment. Where combustion equipment is present, provide combustion safety and hazards information including how to recognize depressurization, dangers of CO poisoning, and fire risks associated with combustion appliance use. 		

6.19 – Worker Safety		
Required Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input type="checkbox"/>	Alternative Funds <input type="checkbox"/>	
Adherence to all federal, state, and local worker safety regulations (e.g., OSHA, EPA).		
Allowable Actions		
Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
If DOE WAP H&S Funds are used for any “allowable” actions, detail them here.		
Prohibited Actions		
Concur with DOE Guidance <input type="checkbox"/>		
Using DOE WAP H&S funds for <i>major</i> repairs as defined by the Grantee’s H&S Plan is prohibited.		
Define “major” repairs		

Define the term “major” repairs using a quantifiable methodology.

Allowable Testing

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.

6.X – (Insert Additional H&S Items for Use of DOE WAP H&S funds)

Required Actions

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

Insert required item text

Allowable Actions

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

If DOE WAP H&S Funds are used for any “allowable” actions, detail them here.

Prohibited Actions

Concur with DOE Guidance

What is prohibited

Required Testing/Inspection

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

Insert required item text

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.

Prohibited Testing/Inspection

Concur with DOE Guidance

What is prohibited

Required Occupant Education

Concur with DOE Guidance

Alternative Guidance

Insert required item text