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U.S. Department of Energy

## WEATHERIZATION ASSISTANCE PROGRAM

### (DRAFT) STATE PLAN MASTER FILE

(Grant Number: \_\_\_\_\_, State: ME, Program Year: 2018)

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## V.1 Eligibility

### V.1.1 Approach to Determining Client Eligibility

#### *Definition of Income Eligibility*

Maine has chosen to use the definition of household income, as described in the Home Energy Assistance Program Rule. Household income includes, but is not limited to, the following: wages, salaries, and bonuses before any taxes or deductions; self-employment income, social security benefits; unemployment and worker's compensation and/or strike benefits from union funds; alimony, child support, or mortgage/rent payments in lieu of or in addition to support payments; military family allotments; veteran's benefits; other support from an absent family member or someone not living in the household, including loans if received within the income verification period; income of person living in the household who is a non-qualified alien and 18 years of age or older; government employee pensions, private pensions, and regular annuity payments; income from dividends, rents, royalties, estates, trusts, and interest; foster care payments if the foster child/adult is a client on the date of application; adoption subsidy; net rental income, including funds from roomers and boarders; forgone rent in exchange for services rendered; lottery winnings; work study; TANF, including Gap, Pass-Through, and ASPIRE, or any other regular support from a government or private agency; capital gains; jury duty fees; assets drawn down from financial institutions when used for expenditures and not reinvested; and rent received in lieu of wages.

#### *Household Eligibility Basis*

Maine has chosen the following definition of low income for the basis of eligibility for the Weatherization Assistance Program (WAP): Low income means that income in relation to household/family size 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.

#### *Income Verification*

Subgrantees obtain required income documentation and verify income eligibility as part of the intake process to certify households eligible to receive fuel assistance benefits from the Department of Health and Human Services' Low-Income Home Energy Assistance Program (HEAP). Only those households whose income has been verified within the previous 12 months to be at or below 200 percent poverty level are considered for weatherization services. Subgrantees will re-verify income eligibility prior to commencing an energy audit for households whose application eligibility certification has expired.

#### *Qualified Aliens*

A household may include (a) an alien who has obtained the status of an alien lawfully admitted for temporary residence under Section 210 of the Immigration and Nationality Act by approval of an application and are categorized as Special Agricultural Workers (SAWS) who perform seasonal agricultural work during a specified period of time; or (b) an alien who has obtained the status of an alien lawfully admitted for temporary residence under Section 245A and 210A of the Immigration and Nationality Act by approval of an application and who is aged, blind and/or disabled as defined in Section 1414 (a)(1) of the Social Security Act (Public Law 74271); or (c) Cuban or Haitian aliens as defined in Public Law 96422, Section 50I(e). Clients are considered eligible if they have a "Green Card" or show permanent residence (I-551 Alien Registration Card, Passport, I-688 Employment Authorization Card, I-766 Employment Authorization Document, I-94 with R-1 or R-2 status designation).

## **V.1.2 Approach to Determining Building Eligibility**

### **Eligibility/Documentation**

In order for weatherization to be completed on a unit, household members must meet one (1) of the following eligibility criteria to assure compliance with the requirements of 10 CFR 440.22:

A dwelling unit shall be eligible for weatherization assistance if it is occupied by a household that meets the eligibility for assistance under the Low Income Home Energy Assistance Act of 1981 as determined in accordance with criteria established by the Director of the Office of Management and Budget.

Prior to weatherizing entire Multi-Family housing units, a specific eligibility test will be applied. Not less than 66 percent (or 50 percent in the case of Multi-Family units of two (2) or four (4) dwelling units), must be eligible or must become eligible dwelling units within 180 days under a federal, state or local program for rehabilitating the building or making similar improvements to the building.

Subgrantee files and records contain authorized HEAP applications with income verification, *Consent Form*, *Proof of Ownership* and *Landlord/Tenant Agreement* (if applicable). All documents are available for review by state or federal staff as needed.

### **Re-weatherization Compliance**

Maine allows units previously weatherized under this part or under other federal programs prior to September 30, 1994 to receive further financial assistance for weatherization under Maine WAP. Maine requires that these units be reported separately. Each dwelling unit served must receive a completely new energy audit that takes into account any previous energy conservation improvements to the dwelling. Subgrantees are allowed to count these homes as completions for the purposes of compliance with the per-home expenditure limit in 10 CFR 440.18

The Maine State Housing Authority (MaineHousing) maintains available data of previously weatherized homes and assists Community Action Agencies (CAAs) in determining compliance with the re-weatherization requirements as requested throughout the year.

### **Eligible Structures**

Maine WAP, includes the following components: an individual audit for each dwelling unit; energy savings calculations based on the American Society of Heating and Refrigerating and Air Conditioning Engineers (ASHRAE) fundamentals; and a comprehensive health and safety protocol. Prior to initiating any weatherization activities, Subgrantees are required to evaluate:

- 1) the physical condition of the home,
- 2) the mechanical systems, and
- 3) building tightness.

Evaluation of the physical condition of the home and its mechanical systems is accomplished through the use of blower door tests, combustion efficiency analysis, ventilation assessment, fossil fuel appliance combustion safety testing, and moisture level evaluation. Results determine the necessity for various remedial actions, which must be accomplished prior to weatherization, as well as whether investing program dollars in the structure is appropriate. If homes fail to meet minimum standards as to Structural Integrity

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and Health & Safety, weatherization must be deferred until the issue is resolved. *See* V.1.2 Deferral Process: Maine's Deferral of Services Policy and V.5.2 Energy Audit Procedures.

Homes which fail combustion safety tests must be deferred until corrective action is taken. Homes with unvented fossil fuel heaters cannot be weatherized until such heaters are removed, except when American National Standards Institute (ANSI) approved and used as secondary heat only. No weatherization activity which will affect the drying capability of the home may be undertaken until all necessary moisture control activities have been completed. After weatherization measures are completed, the home must be checked again to ascertain that all combustion appliances are operating safely.

## **Rental Units/Multi-Family Buildings**

Maine's goal for the weatherization of small Multi-Family units is for the low income tenants to receive a direct benefit. For the purpose of this policy, small Multi-Family properties are those with four (4) or less units, and three (3) stories or less. These are "small Multi-Family properties," not Multi-Family properties of five (5) and more units and/or more than three (3) stories. One of the units may be occupied by the owner. Grantee, consistent with Department of Energy guidance, requires the weatherization of the entire building not just the low income units. The amount available to weatherize the entire building is equal to the maximum dollar amount that may be spent weatherizing the low income units. There are many positive outcomes that result from weatherization; tenant comfort, preservation of affordable housing, and carbon reductions to name a few. However, there is so little money compared with the need that the focus must remain on properties where the low income tenants see a direct financial benefit. Small Multi-Family units will be prioritized similar to Single-Family: tenants with the highest energy use and highest energy burden (as a percentage of income) will receive priority. WAP funding may be used to weatherize small Multi-Family dwellings provided at least 66 percent of residents in a three (3) unit property and 50 percent in a two (2) or four (4) unit property (determined on a building-by-building basis in a multi-building property) meet WAP income guidelines.

Grantee will calculate the Multi-Family cap using the housing tenure indicated in the most recent HEAP or Comprehensive Housing Affordability Strategy data available (whichever is more favorable). For properties with more than one (1) building and a common owner, each building will be considered separately in determining whether the structure will or will not count towards the Multi-Family caps. Weatherization of building structures with one (1) unit (including single-family attached homes such as townhouses, even if part of a larger Multi-Family property, which are separated by a full ground-to-roof wall) and building structures with 2-4 units (including stacked duplexes and triple deckers) do not count towards the Multi-Family caps.

Prior to conducting the energy audit, the Subgrantee must verify the ownership of the unit/building and secure confirmation of the following:

- **Written Permission.** Secure landlord's/owner's and tenant's consent, in writing, to proceed with weatherization measures. Additionally, the landlord and tenant are required to sign a *Weatherization Rental Agreement* before the Subgrantee can proceed with weatherization. The provisions of this Agreement include:
  - **Rent Increases:** Secure landlord's/owner's and tenant's signature on a *Weatherization Rental Agreement* that prohibits an increase for twelve (12) months because of any increase in the value of the property due solely to the weatherization work.

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- Sale of Property: If the property is sold within one (1) year of the completion of weatherization work, the owner may be required to reimburse the Subgrantee for the cost of the weatherization material installed.
- Tenant complaints. Customer survey cards, client phone calls, and client comments during site monitoring are tracked by Grantee. Grantee technicians, program and management staff engage with clients and Subgrantees as needed to address issues. Closure is documented in applicable Grantee databases.
- Undue enhancements. Grantee conducts a desk review on all weatherization jobs and confirms that no undue or excessive enhancements occurred to the value of the dwelling unit. If costs are questionable, an “Open Item Report” is issued to the Subgrantee. Dialog and documentation determines whether the cost is allowable. If not, it is removed from the DOE billing and the Grantee uses non-WAP funding.

## **Deferral Process**

Deferral of Services Policy: If dwellings fail to meet minimum standards as to Structural Integrity and Health & Safety, weatherization must be deferred until the issue is resolved. Documentation of all activities in the client’s file is required. "Deferral" does not necessarily mean that the home will not receive weatherization services but that until the conditions are rectified, the weatherization services are temporarily postponed. Deferral may be required if the auditor determines that any health and safety or structural conditions exist which may endanger the health and/or safety of the workers or occupants. The client will be notified in writing of the reason for deferral and corrective action needed to proceed. In such cases, the use of other existing resources such as MaineHousing’s Home Repair Program or other non-WAP funding available through the Subgrantee will be explored. Work on a deferred unit will not commence until existing dangerous conditions have been corrected. In addition units located in an area slated for development may need to be deferred to ensure that resources are not wasted on a unit slated for demolition or relocation. [DOE Weatherization Program Notice \(WPN\) 17-7](#) will serve as guidance in the deferral process. Unfortunately, there may be extreme cases where the problem is beyond the scope of the available funding and/or a case where the client/owner is not willing to cooperate. In either case the Subgrantee must determine what is in the best interest of all concerned and proceed accordingly, ensuring appropriate documentation is in the client file.

## **V.1.3 Definition of Children**

Definition of children (below age): five (5) years of age or less.

## **V.1.4 Approach to Tribal Organizations**

The low-income members of an Indian tribe shall receive benefits equivalent to the assistance provided to other low-income persons within Maine. Maine allocates funds to five (5) tribal organizations based upon the number of eligible HEAP clients. This has resulted in three percent of Maine's DOE grant award being allocated to the five (5) tribes. Actual administration of the weatherization programs in the tribal organizations is provided by neighboring CAAs.

## **V.2 Selection of Areas to Be Served**

In the case of areas currently served by a CAA established under Section 222(a)(12) of the Economic Opportunity Act of 1964, as amended, funds available under this program will be granted to that CAA as the Subgrantee for the same geographic area. Any new or additional Subgrantees shall be selected at a hearing in accordance with 10 CFR Section 440.14(a), as amended, and upon the basis of the criteria set forth in 10 CFR 440.15(a), as amended.

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Maine's WAP serves all counties statewide through nine (9) Subgrantees. Each Subgrantee is, in fact, a CAA or other public or non-profit entity.

The Grantee ensures that each Subgrantee is selected on the basis of public comment received during a public hearing conducted pursuant to 440.14(a) and other appropriate findings regarding:

- a. The Subgrantee's experience and performance in weatherization or housing renovation activities;
- b. The Subgrantee's experience in assisting low-income persons in the area to be served; and
- c. The Subgrantee's capacity to undertake a timely and effective weatherization program.

In selecting a Subgrantee, preference is given to any CAA or other public or non-profit entity which has, or is currently administering, an effective program under this part or under Title II of the Economic Opportunity Act of 1964. Program effectiveness is evaluated by consideration of factors including, but not necessarily limited to the following:

- a. The extent to which the past or current program achieved or is achieving weatherization goals in a timely fashion;
- b. The quality of work performed by the Subgrantee;
- c. The number, qualifications, and experience of the staff members of the Subgrantee; and
- d. The ability of the Subgrantee to secure volunteers, training participants, public service employment workers, and other federal or state training programs.

## V.3 Priorities for Service Delivery

Priority for weatherization services will be identified through the use of MaineHousing's high energy use/energy burden list, which lists HEAP eligible households and their annual energy consumption usage for heat. Households that include elderly, disabled and/or a child five (5) years of age or less are identified from the list. This information becomes the basis for determining production targets and wait lists. The numbers of elderly, handicapped and families with children five (5) years of age or less are converted into percentages of the entire waiting list which should correlate to production data. The percentage of owner-occupied and renter-occupied units weatherized should also correspond to their percentage of the waiting list.

## V.4 Climatic Conditions

Maine's heating requirements vary from South to North based on the District Heating Factors for the United States. Maine's 7500 to 9800 degree day environment mandates consideration of heating needs. In order to meet the additional heating needs of those in the northern and western portions of Maine, the Grantee uses a sliding scale of allocation based on recorded Heating Degree Days (HDD).

Maine's Hancock Software Energy Audit Tool (HEAT/Enterprise) accounts for localized climatic variances by using weather data from the National Oceanic and Atmospheric Administration (NOAA). Heating degree hours are calculated using weather station data associated with each Maine zip code.

## V.5 Type of Weatherization Work to Be Done

### V.5.1 Technical Guides and Materials

Standards for the proper installation of materials and procedures are described in the [Maine Weatherization Standards Manual](#), and the [Maine Weatherization Field Guide](#) which are located on the

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MaineHousing website <http://www.mainehousing.org/docs/default-source/energy/energy-meexstandards.pdf?sfvrsn=2>; printed copies are available to Subgrantees.

Measures to be performed will be prioritized in accordance with the Maine energy audit system, implemented in accordance with the standard work specifications (SWS) contained in the [Maine Weatherization Field Guide](#), and will be compliant with [WPN 15-4](#).

The [Maine Weatherization Standards Manual](#) is aligned with the companion [Maine Weatherization Field Guide](#), which embodies SWS applicable to the Maine weatherization program. While the [Maine Weatherization Standards Manual](#) and the [Maine Weatherization Field Guide](#) are fully aligned, the documents are distinct. The [Maine Weatherization Standards Manual](#) provides more overview and detail on overarching goals and guidance for delivery of weatherization services. The [Maine Weatherization Field Guide](#) format provides clear quality standards for specific measures and test procedures using concise SWS language and photographs, and is well suited for direct use in the field.

Grantee has created and maintains a dedicated web portal for Subgrantees which provides electronic access to current versions to weatherization field guides, program updates, procedures manuals, standards documents and relevant client education brochures. See <http://www.mainehousing.org/partners/partner-type/community-agencies>.

All Subgrantee Agreements will contain the following language: “Subgrantee agrees to ensure that the standard work specifications for work quality outlined in [WPN 15-4](#), Section 2, will be met and that all contracts with vendors will contain the same requirement.” The Subgrantee’s signature on the Agreement confirms that all expectations contained in the Agreement are understood and agreed to. The Subgrantee must deliver the executed Agreement to the Grantee before WAP funds will be disseminated.

All weatherization work is performed in accordance to DOE approved energy audit procedures and 10 CFR 440 Appendix A.

## **V.5.2 Energy Audit Procedures**

Audit Procedures and Dates Most Recently Approved by DOE

Single-Family December 5, 2016

Manufactured Housing - May 22, 2017

Maine's energy audits consists of the following components:

- an individual audit for each dwelling unit,
- energy savings calculations based on ASHRAE fundamentals, and
- a comprehensive health and safety protocol.

Prior to initiating any weatherization activities, Subgrantees are required to evaluate:

- 1) the physical condition of the home,
- 2) the mechanical systems, and
- 3) building tightness.

Evaluation of the physical condition of the home and its mechanical systems is accomplished through the use of blower door tests, combustion efficiency analysis, ventilation assessment, fossil fuel appliance combustion safety testing, and moisture level evaluation. Results determine the



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necessity for various remedial actions, which must be accomplished prior to weatherization, where investing program dollars in the structure is appropriate.

Maine's health and safety procedures, as described in the [Maine Weatherization Standards Manual](#), require a total assessment of the home. Briefly, and not all inclusive, the auditor is required to assess the home from basement to attic using HEAT/Enterprise:

- list possible pollutant sources;
- record any observable pollutant indicators;
- interview the client as to health problems and lifestyle;
- test all combustion appliances to the degree allowed by law as to efficiency and safe operation;
- perform zone pressure diagnostic testing if applicable;
- determine combustion air requirements and assess the adequacy of the existing combustion air supply;
- test for spillage, back-drafting, and venting capability of all combustion exhaust vents; and
- check CO production of all combustion appliances.

Homes which fail combustion safety tests must be deferred until corrective action is taken. Homes with unvented fossil fuel heaters cannot be weatherized until such heaters are removed, except when ANSI approved and used as secondary heat only. Also, no weatherization activity which will affect the drying capability of the home may be undertaken until all necessary moisture control activities have been completed. After the weatherization measures are completed, the home must be checked again to ascertain that all combustion appliances are operating safely.

If homes fail to meet minimum standards as to Structural Integrity and Health & Safety, weatherization must be deferred until the issue is resolved. Documentation of all activities in the client file is required.

Maine SWS are embodied in the [Maine Weatherization Field Guide](#) and is posted on the MaineHousing website. This measures selection system applies to all types of dwelling units and is based on instrumented audits interacted with ASHRAE 62.2–2016 based calculations for energy use, actual installation and energy costs and material lifetimes to produce a savings investment ratio (SIR)-driven work order. These calculations will be conducted using HEAT/Enterprise.

Grantee requires Subgrantees to utilize, to the degree allowed by law, diagnostic equipment including: blower doors, combustion analyzers, hygrometers, CO analyzers, digital manometers and infrared cameras. Mandated tests include blower door tests, combustion efficiency analysis, minimal ventilation assessment, fossil fuel appliance CO testing, and moisture level evaluation.

Maine's HEAT/Enterprise uses the basic heat loss equation for conductive heat loss, (BTU/hr times area times degrees Fahrenheit over "R") taken from the *ASHRAE 62.2–2016 Fundamentals Handbook*, for pre and post weatherization energy use. Included in the calculations are heating degree day correction factors and a blower door "N" factor when necessary. The results are checked against actual consumption whenever possible (HEAP vendors are required to provide consumption data; clients are asked to provide fuel bills during the audit). As the database grows any necessary adjustments to correction factors will be made. Maine's energy audit calculates SIRs for each contemplated weatherization measure, which reflect local heating degree day figures and a heating degree day correction factor.

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In HEAT/Enterprise, material lifetimes were updated based on DOE input and are the most conservative generally accepted by the industry. Installation costs are established by using actual subcontractor and supplier bids as well as crew installation costs at each Subgrantee.

An SIR is calculated for each contemplated energy conservation measure (ECM). Measures are arranged in descending order of payback by HEAT/Enterprise with any individual measure with a SIR of less than 1 being considered "unallowable" unless paid for with another funding source (non-DOE). It is possible for the Subgrantee to elect to do fewer measures than proposed on any given job as long as measures are accomplished in the order established by HEAT/Enterprise. However, this is not the preferred practice considering that a home may only be weatherized with DOE funds once in a lifetime, unless weatherized prior to September 30, 1994.

Projected incidental repair costs are also calculated and added to the total cost. Incidental repair costs are capped at 15 percent of the total cost of weatherization tasks being completed (conductive + air infiltration + mechanical tasks) in a contract period. Overall calculated SIR for activities excluding health and safety must be equal to or greater than 1. Maine's audit system assigns an energy savings to air infiltration reduction as determined by reduction of the CFM50 figure from blower door testing. As there is no way to accurately predict a post weatherization CFM50 figure, Grantee may waive the SIR requirement for the aggregate of air infiltration reduction measures on a case-by-case basis if the overall payback requirement is not met by the post blower door test.

All weatherization work is performed in accordance to DOE approved energy audit procedures and 10 CFR 440 Appendix A.

### **V.5.3 Final Inspection**

Every DOE WAP unit reported as a completed unit receives a final inspection by the Subgrantee's BPI certified Quality Control Inspector (QCI), to ensure that all work meets the minimum standard work specifications as outlined in the [Maine Weatherization Field Guide](#) in accordance with 10 CFR 440. The QCI must complete and provide an *Inspection Completion Form* to Grantee for every completed unit, certifying that the weatherization materials and measures were properly installed in accordance with the Maine WAP standards.

Grantee monitors conduct desk reviews on up to 100 percent of completed jobs, based on Subgrantee performance. Grantee will only authorize payment to the Subgrantee when satisfied that all work is completed in accordance with the work quality requirements outlined in [WPN 15-4](#), Section 1. The Subgrantee is notified of any jobs not in compliance and is required to take the steps necessary to complete the job. In addition, the Grantee will perform quality assurance reviews of at least five percent of completed units and 10 percent of all completed units of Subgrantees that allow the audit and inspection to be done by the same person.

Subgrantee Agreements outline disciplinary action for inadequate inspection practices and as well as other duties not performed in accordance with expectations contained in the Agreement. To wit: Grantee shall notify the Subgrantee of the respects in which the Subgrantee's performance is deficient and the time period Subgrantee has to conform its performance. In the event the Subgrantee fails to correct deficiencies in its performance within the specified time, Grantee may withhold Subgrantee's funding under the Agreement until Subgrantee is in compliance.

If a Subgrantee weatherizes without approved clearance and Grantee subsequently determines the project is financed/owned by a Subgrantee, or sufficient reserves are in place for the project to incur these costs, Grantee has the right to refuse to reimburse for weatherization costs incurred.

## V.6 Weatherization Analysis of Effectiveness

Grantee plans to implement the following procedures to analyze the effectiveness of weatherization projects:

- Grantee reviews estimated energy savings calculations and reports produced by HEAT/Enterprise, which also prioritizes all activities in all types of housing addressed by WAP.
- Grantee surveys recipients of weatherization services and results are shared with Subgrantees performing the work.
- Grantee's Energy and Housing Services team (EHS) communicates regularly with Subgrantee weatherization technicians through telephone, email and onsite visits.
- EHS staff participates in monthly Housing Council meetings and Building Technician Committee (BTC) meetings hosted and attended by Subgrantees directors, managers and technical staff. These meetings provide a platform to receive and solicit feedback from Subgrantees regarding technical concerns, training and other areas that may need improvement. Grantee will implement training based on need.
- Grantee conducts up to 100 percent desk review of all jobs and provides timely feedback to Subgrantees. Grantee maintains a database which tracks jobs that have issues, the follow-up with the Subgrantee, and documents resolutions.

## V.7 Health and Safety

The primary goals for Maine WAP are to implement cost effective weatherization procedures to conserve energy and to assess and correct related health and safety hazards. Materials used for the abatement of such hazards not listed in Appendix A of 10 CFR 440 must meet all standards incorporated by reference and made a part of Part 440.

Subgrantees will be allowed to expend program funds for the abatement of energy related health and safety hazards up to an average of \$1,200 per unit. Grantee health and safety related costs will be charged to either the administrative or training and technical assistance cost category. It is the responsibility of Subgrantees to manage health and safety expenditures, which Subgrantees report as part of the billing process. The health and safety costs excluded from the cost effective calculations are tracked separately.

The cost of eliminating health and safety hazards, which is necessary before or because of installation of weatherization materials, is an allowable expense. Subgrantees are encouraged to leverage other funds whenever possible when addressing non-cost effective tested items. Problems with the dwelling unit that have no connection with weatherization activities can only be addressed with other funding sources, such as MaineHousing's *Lead Hazard Reduction Demonstration Grant*, or its *Home Repair Program*. Potential funding sources include, but are not limited to:

- Central Heating Improvement Program (CHIP)
- Community Development Block Grant (CDBG)
- MaineHousing Housing programs
- City or Town assistance
- USDA Rural Economic Development (formerly FHA)
- Housing and Urban Development (HUD)
- Local church and community groups
- Building Materials Bank

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- Habitat for Humanity
- Donations from local businesses
- Landlords

## **Intake Procedures**

Per the [Maine Weatherization Standards Manual](#), the auditor's duties include an evaluation of available information starting with viewing the client application, interviewing the client, and assessing the dwelling. A series of tests as outlined in the [Maine Weatherization Standards Manual](#) and the [Maine Weatherization Field Guide](#) are performed in order to identify potential health and safety hazards as well as energy conservation opportunities. The clients sign a *Consent Form* which specifies that “In consideration of any WAP services received, I have received a copy of the EPA publication [The Lead-Safe Certified Guide to Renovate Right](#) and have also been educated on weatherization and health and safety topics pertinent to my home.”

## **Client Education and Training**

As outlined in [WPN 17-7](#), the auditor makes the client aware of potential hazards and provides them with appropriate instructions and educational materials. The client also receives guidance and information on energy conservation tips, both verbally and through educational materials relating to the subject(s). In addition to various brochures and manuals available to clients, education is provided as the home is being weatherized. Crews, contractors, inspectors and other qualified personnel explain various related concepts as the work progresses. Clients are encouraged to contact appropriate agencies after weatherization if they have any questions, concerns, or wish to report feedback on the conservation efforts.

## **Deferral of Services Policy**

See *Deferral of Services Notice* section of this document.

## **Grantee Health and Safety Program**

Grantee health and safety related costs will be charged to either the administrative or training and technical assistance cost category. Grantee must follow all Occupational Safety and Health Administration (OSHA) safety regulations, and national, state and local codes as further described under the Agency/Contractor Safety section below.

## **Agency/Contractor Safety**

Subgrantees must comply with OSHA requirements in all weatherization activities. When contractors are employed by local agencies those contractors are expected to comply with OSHA requirements as well. The contractors' costs to comply with OSHA, as applicable, are part of their bid price. Related costs for Subgrantees to comply with OSHA requirements may be charged under section 440.18 as health and safety, tools and equipment, incidental repairs, etc.

Maine WAP expects the crews, contractors, and other field personnel to be able to work under conditions that do not jeopardize their own health and safety.

Weatherization personnel shall be properly trained in workplace safety and will be provided with necessary protective equipment by their employer. All weatherization workers must comply with EPA's Renovation, Repair and Painting Rule (RRP) and at least one (1) person on each weatherization crew (includes both subcontractor crews and Subgrantee direct hires) must be trained in lead safe weatherization (LSW).

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Subgrantees and contractors are expected to follow the requirements of Construction Industry OSHA Safety and Health Standards (29 CFR 1926/1910).

Subgrantees must comply with the OSHA Hazard Communication "Right to Know Program." The program requires chemical manufacturers or importers to assess the hazards of chemicals which they produce or import. It also requires that all employers provide information to their employees about the hazardous chemicals to which they are exposed, by means of a hazard communication program, labels and other forms of warning, material safety data sheets, and information and training. Subgrantees must follow the record keeping requirements for Occupational Injuries and Illnesses.

Subgrantees are responsible for maintaining agency vehicles so that they are in safe and proper operating condition.

Subgrantees are responsible for ensuring all work performed in client homes abides by federal, state, and local codes and regulations.

Grantee verifies contractor and Subgrantee compliance with OSHA 10, Safety Data Sheets (SDS), LSW, and RRP requirements as follows:

As part of the annual bid process, contractors are required to submit LSW and RRP certifications. MaineHousing reviews this documentation to ensure compliance.

Grantee conducts in-progress monitoring inspections to verify compliance with OSHA 1910 and 1926, LSW, RRP, and reviews/compares SDS information to actual products being installed.

Grantee conducts client interviews to confirm that they received SDS information prior to the installation of WAP measures.

## **Client Health and Safety**

Client health and safety is a priority for Maine WAP. Through DOE trainings, related trainings at Maine Safety Works, and field training, Maine has developed a comprehensive plan to ensure safety in energy related areas. Subgrantees are required to have the proper equipment to perform the necessary weatherization tests. Agency personnel are required to attend trainings as determined necessary. Homes constructed prior to 1978 are presumed to contain lead paint. All weatherization clients residing in homes constructed prior to 1978 will receive the EPA publication [\*The Lead-Safe Certified Guide to Renovate Right\*](#) at least 10 days prior to the commencement of any weatherization activities.

Maine's Community Action Agency Building Technology Committee (BTC) meets on a monthly basis to discuss all aspects of the weatherization program. The committee consists of a technical representative from each Subgrantee. Through this venue Subgrantees are continually updated with information and techniques regarding energy conservation and health and safety issues. This system ensures that all Subgrantees are receiving the same information and creates consistency for a quality program statewide.

The Weatherization and CHIP programs work in unison to guarantee "A House as a System" approach when conducting an audit.

All Subgrantees have blower doors, digital manometers, CO testers, heating system efficiency testers, and hygrometers, as well as other test equipment. All weatherization personnel are required to be trained in energy related health and safety issues and indoor air quality problems. Testing and corrective procedures requiring special licensing on a state level will be referred to the appropriate authority.

## Health and Safety Guidance

Maine uses the [Table of Issues](#) (adopted in [DOE WPN 17-7](#)) as a reference of a majority of conditions that Maine regards as hazardous. In all cases these conditions will determine the course that weatherization will take. The chart outlines the hazard, the importance of correction, if postponement of weatherization services is necessary, types of testing, and corrective procedures for each hazard. The following will be assessed and addressed, as applicable, in accordance with [WPN 17-7](#) Table of Issues:

- [Air Conditioning and Heating Systems](#) - Because of Maine's high heating degree day environment, cooling needs are considered to be insignificant for Maine dwellings. Therefore, Maine climate conditions do not warrant defining at-risk occupants or the repair or replacement of air conditioning systems under DOE WAP.
- [Asbestos](#) - According to the EPA's *Building Air Quality Guide*, the mere presence of asbestos in a building does not mean that the health of a building occupant is endangered. Asbestos-containing material in good condition, not damaged or disturbed, is not likely to release asbestos into the air.
- [Biologicals/Mold](#)
- [Building Structure and Roofing](#)
- [Code Compliance](#)
- [Combustion Appliances and Combustion Gases](#) - MaineHousing recognizes that combustion gases in homes pose the most serious hazard. As a result, MaineHousing has adopted a comprehensive plan to ensure safe operation of combustion appliances and to make sure that weatherization procedures do not contribute to a problem.

It is MaineHousing policy that oil-fired combustion heating appliances in homes to be weatherized must have been professionally serviced within the previous 12 months; and gas-fired combustion heating appliances must have been serviced within the previous 24 months, of the audit date. Documentation of the service date must be provided. Any combustion heating appliances that do not meet this requirement must receive a Clean Tune and Evaluate (CTE) by a licensed heating technician.

Of all the by-products of fuel combustion, carbon monoxide (CO) is deadly. Maine views any ambient level of CO as potentially dangerous and will be considered a warning signal that a problem exists. According to ASHRAE standards, the maximum allowable concentration for short term exposure is 9 ppm in residential settings.

Corrective procedures requiring special licensing will be referred to the appropriate authority.

- [Electrical](#)
- [Formaldehyde and Volatile Organic Compounds \(VOCs\)](#)
- [Fuel Leaks](#)
- [Gas Ovens/Stove Tops/Ranges](#) – Gas cooking appliances will be assessed and addressed in accordance with SWS.
- [Hazardous Materials Disposal](#)
- [Injury Prevention of Occupants and Weatherization Workers](#)
- [Lead-based Paint](#)



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- Mold and Moisture - A thorough moisture assessment of the home is done during the audit process and conditions are noted in HEAT/Enterprise. The assessment process includes a client interview, visual inspection, measuring humidity levels and blower door testing. Corrective procedures include client education, eliminating/reducing source of moisture, and providing mechanical ventilation as prescribed by ASHRAE standards.
- Occupant Pre-existing or Potential Health Conditions
- Pests
- Radon
- Safety Devices: Smoke and Carbon Monoxide Alarms, Fire Extinguishers
- Ventilation and Indoor Air Quality
- Window and Door Replacement
- Worker Safety

Grantee has implemented the following additional guidance:

- Diagnostic Equipment - Diagnostic equipment, such as blower doors, will not be used on units where such equipment could exacerbate existing problems (*e.g.*, vermiculite in open floored attics).
- Spray Polyurethane - Maine must follow EPA recommendations (available online at <http://www.epa.gov/saferchoice/spray-polyurethane-foam-spf-insulation-and-how-use-it-more-safely>)

## V.8 Program Management

### V.8.1 Overview and Organization

The Maine State Housing Authority (MaineHousing), created in 1969, is Maine's housing finance agency. Its mission statement reads, "The mission of the Maine State Housing Authority is to assist Maine people to obtain and maintain decent, safe, affordable housing and services suitable to their unique housing needs." In carrying out this mission, MaineHousing provides leadership, maximizes resources, and promotes partnerships to develop and implement sound housing policy.

Since its inception, MaineHousing has provided housing for low and very low income renters and the opportunity for low and moderate income Maine families to purchase their own homes. In the more recent past, MaineHousing has expanded its programs to meet new challenges posed by various housing needs: people who are homeless; people with special housing needs (such as mental health consumers); the elderly; low income homeowners who cannot afford basic home repairs; and others.

The State of Maine developed the nation's first Weatherization Program in 1973 in response to the energy crisis that gripped the northeast and caused economic hardship across the country. Maine WAP became the model used in developing funding for a program in every state in the nation. The program was originally administered by the Division of Community Services, an executive department agency. It was re-assigned to MaineHousing in 1991.

By its nature, MaineHousing rarely serves its customers directly. It places a heavy reliance on its partners to deliver its programs and services to the households that it serves. These partners include real estate professionals and lenders, non-profit organizations, other government agencies (in particular, Maine Department of Economic and Community Development, and Health and Human

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Services) municipalities, for-profit corporations, private developers, private landlords, management corporations, and CAAs. With offices located throughout Maine, 9 of Maine's CAAs serve as Subgrantees for the DOE Weatherization and Low Income Home Energy Assistance Programs (HEAP).

In addition to WAP, MaineHousing serves as Grantee for HEAP, Central Heating Improvement Program and other home repair programs. Weatherization serves as MaineHousing's cornerstone to providing thousands of Maine homeowners and renters with funds to repair and improve their homes. CDBG and other state and federal sources of funds will be used in conjunction with WAP funds to address this home repair crisis. In addition, MaineHousing consistently designates 15 percent of its HEAP grant to weatherization and heating system repair programs.

### **Review of Subgrantee Work Plans, Budgets, and Reported Results**

Grantee requires Subgrantees to provide a new work plan for the 2018 DOE program. Grantee will review the detailed work plan for each Subgrantee, request any updates, if necessary, and a detailed budget for the new program year. No funds will be advanced to Subgrantees until such work plans and budgets are reviewed and approved by EHS staff.

EHS will perform comparisons of Subgrantees monthly billings versus their approved budgets to identify financial or compliance variances. EHS staff will work with Subgrantees to correct/understand variances as they are identified during this process.

### **Allocation of Funding to Subgrantees**

MaineHousing will allocate program funding to Subgrantees based on the percentage of HEAP applications approved. MaineHousing reserves the right to re-allocate funding among Subgrantees during the program year based on program performance and need statewide.

WAP is currently operating under a Continuing Resolution for Fiscal Year (FY) 2018. For planning purposes, until a final full year FY 2018 budget is passed and signed by the President, Grantees have been advised to develop their Grantee Plans using the same funding level as the DOE 2016 Appropriated Funds outlined in [WPN 16-2A](#). Final allocations will include adjustments from the planning numbers reflected in [WPN 16-2A](#).

### **American Consumer Satisfaction Index Survey**

DOE WAP utilized the American Customer Satisfaction Index (ACSI) to survey Subgrantees of the WAP. This survey provided Subgrantees the opportunity to provide DOE WAP feedback on several aspects of the Program operation and helped identify opportunities for improvement.

On May 30, 2017, MaineHousing shared the DOE WAP Subgrantee State-level report for Maine with Subgrantee Housing Directors via email. Maine's highest scores were in the area of Technical Assistance, including responsiveness to technical assistance requests. Survey results also identified several areas of challenge and opportunities for improvement, including Development of the State Plan and Partnerships.

On September 1, 2017, MaineHousing management attended the Maine Community Action Agency Housing Council meeting. MaineHousing shared a plan and accompanying timeline with the Housing Council aimed at opening lines of communications around developing the 2018 DOE State Plan. On September 20, 2017, a SurveyMonkey survey was emailed to all Subgrantee Executive Directors (9) and Housing Directors (9). The survey closed on October 2, 2017. Survey results and a summary report were shared with Subgrantee Housing Directors at the October 6, 2017 Housing Council meeting. Results of the survey, including



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training needs, are being used by Grantee to inform training plan development and program operations, including enhanced two-way communications with Subgrantees.

On November 3, 2017, MaineHousing WAP team members joined Subgrantee Housing Directors at the Housing Council meeting to discuss any changes Subgrantees would like to see made in the 2018 DOE State Plan. Input from this meeting has been considered and accommodated as much as possible in developing the 2018 DOE State Plan.

## **V.8.2 Administrative Expenditure Limits**

Allocation of the funds for the current Program Year show all Subgrantees at five percent administration. (See Annual File - Part A) Once all Subgrantee budgets are reviewed and approved, the Grantee will file an amendment to this State Plan, reflecting actual budgeted administrative costs.

Maine WAP may allow up to an additional five percent administrative funding for Subgrantees which qualify based on the following criteria:

1. As required by federal regulations, the Subgrantees must receive less than \$350,000 for their total annual sub-granted amount.
2. Subgrantee budgets must reflect reasonably expected administrative costs for the new grant period which are in excess of the five percent. These expected costs should be based on the best information currently available.
3. The Subgrantees must have no uncorrected audit or monitoring findings regarding the allocation of costs to the DOE sub-grant for the most current period available.

Any Subgrantee meeting criteria defined in 10 CFR 440.18(d) may receive increased administrative funding, not to exceed an additional five percent (10 percent total), based on actual costs incurred. The Grantee will require the Subgrantees to submit a letter of application for additional administrative funding. This letter must address the impact on production and the need for the additional administrative funds as well as the three (3) criteria shown above.

## **V.8.3 Monitoring Activities**

### ***Programmatic/Subgrantee Monitoring***

The monitoring approach under the Maine WAP is to work closely with Subgrantee personnel to ensure continued quality workmanship and to ensure adequate financial systems and procedures. Maine WAP will administer Quality Control Inspections (QCI) in accordance with SWS outlined in the [Maine Weatherization Field Guide](#) and 10 CFR 440 using both the independent QCI and independent auditor/QCI. This will enable Subgrantees with fewer staff to utilize the process. In all cases QCIs will be Subgrantee employees and the Grantee will perform quality assurance reviews of at least five percent of completed units and 10 percent of all completed units of Subgrantees that allow the audit and inspection to be done by the same person.

Comprehensive coverage of all Subgrantee WAP activities is achieved by a combination of regularly scheduled Grantee efforts:

1. Administrative and fiscal monitoring – annually.
2. Onsite inspection of completed units – monthly.
3. Client file review – monthly.

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4. Review of Subgrantee work plans, budgets, and reported results – ongoing.
5. Review of independent Subgrantee annual audits – annually.

MaineHousing has developed its own monitoring tool that includes reviews of the Subgrantee Uniform Grant Guidance Audit prescribed by 2 CFR 200. Among other things, MaineHousing has determined that the DOE monitoring tool duplicates many financial and compliance audit requirements under 2 CFR 200 which all Subgrantees must have their independent auditors perform annually. MaineHousing routinely reviews Subgrantees' annual independent audits.

### **Financial Monitoring**

EHS staff will perform comprehensive administrative and fiscal monitoring of each WAP Subgrantee on an annual basis using the Compliance Review Administrative Monitoring Tool. During the annual administrative and fiscal audit, MaineHousing conducts a 10 percent file review of Subgrantee's production. If a significant issue is cited MaineHousing will expand the sample size.

The EHS Fiscal Compliance Specialist addresses the following areas of performance under DOE Weatherization:

- Annual Financial Monitoring review
  - Financial/Fiscal Accountability
  - Uniform Grant Guidance Audit prescribed by 2 CFR 200
  - General ledger
  - Payroll/Personnel/Timecards
  - Vehicles and equipment purchases
  - Indirect rate review to make sure it is being calculated correctly
  - Invoicing
  - Record retention
  - Corrective action plans
  - Contractor payments
- Annual Production File Review
  - Procurement process
  - Energy audits
  - Eligibility
  - Proof of ownership
  - In progress and final inspections
  - Contractor invoices
  - Release of liens
  - Scope of work

Each comprehensive monitoring visit includes an exit interview during which the EHS Fiscal Compliance Specialist apprises Subgrantee personnel of pertinent findings and recommended improvements, as applicable. Within 30 days of the administrative/fiscal

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monitoring visit, the EHS Fiscal Compliance Specialist will prepare and deliver a report to the Subgrantee summarizing these findings and requesting corrective actions. Additionally, the Fiscal Compliance Specialist will perform a six (6) month follow-up review of corrective action plans, if applicable.

If significant issues are identified, MaineHousing requires the Subgrantee to submit a corrective action plan for MaineHousing's review/approval. MaineHousing will conduct a six (6) month follow-up review to ensure the plan was executed and effective in addressing the issues.

### **Independent QCI Monitoring**

EHS Technical Service Specialists will perform onsite inspections of completed and in-progress units statewide on a monthly basis. They will inspect a minimum of five percent of completed units and 10 percent of all completed units of Subgrantees that allow the audit and inspection to be done by the same person.

If significant issues are identified, the Technical Services Specialists will expand the percentage of inspected units. Criteria for unit inspections will be:

- Maine Audit System
- [\*Maine Weatherization Standards Manual\*](#)
- [\*Maine Weatherization Field Guide\*](#)
- Program Guidance
- Department of Energy Regulations

Capture and reporting of inspection data will be accomplished using a comprehensive checklist that includes:

- Assessment of auditors' pre-existing R-values and accurate building model
- Evaluation of auditors' approach for each distinct area of the structure, attic, walls, basement, site specifics, etc.
- Verification and evaluation of each installed measure
- Combustion appliance inspection and combustion safety testing data
- Blower door, pressure pan and other applicable building diagnostics data
- Exhaust device cfm measurement and confirmation of correct ASHRAE ventilation requirement
- Confirmation of on-site documentation required by SWS such as Insulation Certificates
- Client comments, concerns and positive remarks

Within 30 days of the site inspection, the Grantee monitor submits a Unit Inspection Report to the Subgrantee. These reports include findings and any required corrective actions, communications with the client/owner and contractor, observations and an assessment of the auditor's performance. If a rework is ordered, the Subgrantee will have 30 days to complete the rework and notify EHS, in writing, of its completion. The Subgrantee may also contact the Director of EHS in writing during this 30-day period to appeal a rework finding. The unit will be revisited by the Director of EHS, a representative of the Maine Community

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Action Agency Housing Council, the Grantee monitor, and a Subgrantee representative to resolve the dispute through actual onsite observations and discussion of discrepancies.

If the rework ordered is not rescinded following this appeal process, the Subgrantee will have 30 days from the date of the appeal resolution to complete the rework.

If reworks are not completed within 30 days, and the Subgrantee has not demonstrated reasonable cause for delay, a billing adjustment will be made for the entire dwelling unit. The unit will not be reinstated until the rework has been completed.

If there are significant deficiencies identified, the Grantee monitor will increase the number of units reviewed and frequency of monitoring visits to the Subgrantee until there are assurances that all deficiencies have been resolved.

Subgrantees are required to submit corrective action plans when there are indications that the Subgrantee has significant compliance issues.

In addition to the onsite (technical monitoring), the Technical Service Specialists conducts up to 100 percent desk/file review of the completed units submitted by each Subgrantee, depending on their performance. This practice allows the Grantee to closely monitor best practices, identify concerns, and select/prioritize units for onsite inspections. The Grantee monitors will use a monitoring tool to capture and track instances of improper installation, incomplete documentation, audit inaccuracy or other deficiency. Tracked deficiencies will be weighted by severity from minor to concerning.

### **Independent Subgrantee Audit**

Each Subgrantee will have an audit of their financial statements and a Uniform Grant Guidance Audit prescribed by 2 CFR 200 compliance audit conducted by an independent CPA firm following the close of the Subgrantee fiscal year. These audits will comply with all regulations pertaining to DOE WAP and will be made available to Grantee management. MaineHousing's Fiscal Compliance Specialist evaluates/reviews the results of these audits on an annual basis.

Subgrantee must provide written assurance that corrective action has been taken or present a plan to correct any noted deficiencies within 60 days. During and following this 60-day corrective action period, Grantee staff will offer and be available for training and technical assistance as needed by the Subgrantee.

### **V.8.4 Training and Technical Assistance Approach and Activities**

The goal of Maine's WAP training and technical assistance (T&TA) plan is to support the efficient operation of the WAP and to ensure the effectiveness and quality of the work performed. The desired result of these efforts is to conserve more energy and to accomplish greater savings in heating costs for WAP clients.

MaineHousing's WAP T&TA plan provides a variety of activities to support developing and enhancing skills of personnel at the Grantee and Subgrantee levels. The desired result of all T&TA activities is to maximize energy savings, ensure health and safety of clients and WAP personnel, minimize operating costs, improve management and administrative procedures, and prevent waste, fraud and abuse.

The T&TA plan incorporates results and information made available through EHS field monitoring visits, [WPNs](#), input from Subgrantees, and a DOE WAP monitoring visit completed in October 2017. All Tier I training in PY 2018 will be conducted by Interstate Renewable Energy Council

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(IREQ) accredited training organizations. Tier II trainings will be administered by QCI or qualified personnel on an as needed basis. In addition, Grantee and Subgrantee staff will attend Tier II trainings.

## Grantee/Subgrantee Training

MaineHousing supports the professional development and training needs of Grantee and Subgrantee weatherization staff and contractors. Subgrantees are provided T&TA funds that allow them flexibility in meeting training needs for their WAP staffs and contractors.

1. QCI Training. Grantee will coordinate and fund BPI Quality Control Inspector training and certification for Grantee and Subgrantees staffs.
2. Financial Regulation Training. Grantee will fund training through attendance at an annual WIPFLI Financial “Supercircular” Training. This training is important for Grantee and Subgrantees to better understand the numerous changes to financial regulations in Federal programs.
3. Northeast Indoor Air Quality and Energy Conference. MaineHousing will address health and safety training through attendance at the 2018 Northeast Indoor Air Quality and Energy Conference held in Maine. MaineHousing will send 2 technical staff to increase their knowledge of improving the indoor air quality and environment of homes to be weatherized. Content shared at this event is consistent with [WPN 11.6](#) and the standard work specifications as adopted in [Maine’s Weatherization Field Guide](#). Subgrantees are supported in sending technical staff and contractors to the conference.
4. Grantee, Subgrantee and Contractor Training. Grantee will coordinate and fund training to address the top training topics/needs identified by Subgrantees including: HEAT Enterprise software, monitoring and technical best practices, [WPN 17-7](#) health and safety guidance, and training needs identified through Grantee monitoring activities. Grantee will also coordinate additional training identified during a DOE monitoring visit held in October 2017, including: HEAT/Enterprise energy audits, OSHA 10, and ASHRAE 62.2 2016.
5. National and Regional Conferences. MaineHousing will send Grantee and Subgrantee technical and fiscal personnel, as well as Grantee-approved weatherization contractors to Department of Energy approved training conferences.
6. In-House Training. Grantee staff will provide training on-site as needed in technical and fiscal matters.

All Subgrantees are required to submit a T&TA work plan with their budget for Grantee approval. These work plans will identify and address T&TA needs at Subgrantee agencies. A standard outline will be provided to all Subgrantees setting forth the areas required in their work plans. The Grantee will review the work plans and budgets to determine whether the Subgrantees are complying with the outline as well as the standards stated above. The Grantee will also coordinate and provide all Subgrantees with current developments in technical procedures and DOE guidance on technical issues. Through these procedures, the Grantee will ensure consistency in the Subgrantees' procedures as well as identifying needs of individual Subgrantees. The Grantee will expend every effort, through monitoring and management activities, to ensure that Maine continues to operate a quality WAP.

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The Housing Director of each Subgrantee will notify the Grantee and the Housing Council of any and all planned training sessions so that common needs are coordinated and duplication is avoided.

The Grantee will continue to conduct surveys of all Subgrantees and solicit input from Grantee staff to identify training needs. This information is utilized to determine which topics the Grantee and Subgrantees will schedule for trainings during this and future grant periods. The results of the survey will be shared with the Housing Council to assist with their employee and subcontractor trainings and meetings.

Maine also relies heavily on information gathered during the monitoring process to determine and prioritize training needs. There will continue to be training such as EPA Certified Lead Renovator training which requires EPA certified trainers and other specialized training as it becomes available (i.e. Maine Indoor Air Quality, Home Performance Coalition, etc.). MaineHousing is notified of these external training opportunities and informs Subgrantees/contractors of them.

MaineHousing tracks applicable Grantee and Subgrantee credentials to ensure maintenance of these credentials.

The effectiveness of T&TA activities is gauged by:

- review of session evaluation forms;
- feedback from Building Technical Committee and contractor meetings;
- comparison of pre & post training on-site results; and
- analysis of responses to annual Subgrantee training needs surveys.

### **Client Education**

Per the [Maine Weatherization Standards Manual](#), energy auditors and inspectors are required to provide the client/owner education during all phases of the weatherization process. This includes, but is not limited to:

- how the weatherization process will address health and safety issues;
- explanation of energy-conserving measures that will be installed;
- recommendations on how the client can conserve energy; and
- explanation of required maintenance for existing equipment, added equipment, or energy-saving measures.

## **V.9 Energy Crisis and Disaster Plan**

In the event that an energy crisis or disaster plan is triggered by state or federal declarations, Grantee will ensure that use of WAP funds adhere to procedures outlined in [WPN 12-7](#).