

Nebraska
Department of
Environment and Energy
Weatherization Assistance Program

Program Year 2022-2026
BIL State Plan
July 1, 2022 – June 30, 2027

Department of Environment and Energy

Jim Macy, Director

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DRAFT

WEATHERIZATION ASSISTANCE PROGRAM
BIL STATE PLAN
July 1, 2022 – June 30, 2027

Executive Summary

This Nebraska State Weatherization Assistance Program (WAP) Bipartisan Infrastructure Lam (BIL) Plan serves as Nebraska’s application to the US Department of Energy (USDOE) for WAP BIL funding. These funds are appropriated by the *Infrastructure Investment and Jobs Act, Public Law 117-58* and will aid approximately one thousand six hundred and eighty-five (1685) households across the State.

The purpose of the Program is to install energy conservation measures in the homes of income-eligible persons, especially homes occupied by the elderly, persons with disabilities, and families with children. Funds are targeted to the most cost-effective energy efficiency measures, as determined by an on-site energy audit of the eligible building. The program helps to reduce national energy consumption and related emissions and lessens the impact of higher energy costs for low-income families. The program also improves the health and safety (H & S) of assisted households.

Nebraska relies on a network of seven (7) Subgrantee Community Action Partnerships (CAP) and one (1) non-profit agency, all which have an extensive experience in delivering weatherization and affordable housing services in their designated service areas. Subgrantees provide energy efficiency weatherization services using their own trained crews and by subcontracting work to qualified contractors. Energy efficiency measures financed through the program can range from air sealing and insulating to replacement of heating systems. The program assists all types of housing units, including single- and multifamily housing, manufactured housing, and group homes. The Nebraska Department of Environment and Energy (NDEE) will allocate BIL program funds in accordance with this plan.

I.1 Budget

BIL Program Allocation – USDOE	\$24,527,380
Training and Technical Assistance	\$4,315,678
Nebraska Department of Environment and Energy Administration	\$981,095
Subgrantee Administration	\$2,698,012
CPA Audits	\$60,000
Liability Insurance	\$216,042
Health and Safety (21%)	\$2,765,592
Program Operations	\$13,490,961

The activities described in the State BIL WAP Plan are subject to final approval of appropriations to the U.S. Department of Energy and receipt of federal funding the Nebraska Department of Environment and Energy. The Nebraska Department of Environment and Energy reserves the right to modify or withdraw the State BIL WAP Plan if and to the extent such funding is not received.

I.2 Proposed Weatherization Projects

USDOE

Allocation

Subgrantee

PY2022-PY2027

Blue Valley Community Action Partnership	\$1,849,532
Central Nebraska Community Action Partnership	\$2,808,250
Northeast NE Community Action Partnership	\$3,023,692
Community Action Partnership of Lancaster & Saunders Counties	\$2,915,971
Community Action Partnership of Mid Nebraska	\$3,066,781
Northwest Community Action Partnership	\$2,808,250
Southeast Nebraska Community Action Partnership	\$1,784,899
Habitat for Humanity of Omaha	\$3,346,856

I.3 Summary of Major Changes for the State BIL WAP Plan

An average per dwelling unit limit for Health & Safety expenditures of \$1,700.00 has been established, based on historical data. Units that exceed the \$1,700.00 limit must receive approval from NDEE on a case-by-case basis.

IV.1 Subgrantee

In accordance with 10 CFR Part 440, an entity that receives funds from the Department of Environment and Energy to manage a weatherization project is considered a WAP Subgrantee. The Department of Environment and Energy enters into a Financial Assistance Subaward with Subgrantees to perform WAP services within specified service areas throughout the State.

Blue Valley Community Action Partnership

PO Box 273
620 5th Street
Fairbury, NE 68352

Type of Organization: Community Action Partnership agency

Source of Labor: Private Contractors and Crews

Contact: Brandon Bonar Email: bbonar@bvca.net

Phone: 402-729-2278 Fax: 402-729-2801

Counties Served: Butler Fillmore Gage
Jefferson Polk Saline
Seward Thayer York

PY2022-PY2026 BIL

USDOE Allocation: \$ 1,849,532.00

Minimum Units: 145

Congressional districts served and percent of Subgrantee allocation:	<u>Congressional District (CD)</u>	<u>Percent</u>
	01	31%
	03	69%

Central Nebraska Community Action Partnership

PO Box 509
626 N. Street
Loup City, NE 68853

Type of Organization: Community Action Partnership agency

Source of Labor: Private Contractors and Crews

Contact: Amber Beck Email: abeck@centralnebraskacap.org

Phone: 308-745-0780 Fax: 308-745-0824

Counties Served: Blaine Boone Boyd
 Brown Colfax Custer
 Garfield Greeley Hall
 Hamilton Holt Howard
 Keya Paha Loup Merrick
 Nance Platte Rock
 Sherman Valley Wheeler

PY2022-2026 BIL

USDOE Allocation: \$2,808,250.00

Minimum Unit: 219

Congressional districts served and percent of Subgrantee allocation:	<u>CD</u>	<u>Percent</u>
	01	25%
	03	75%

Northeast Nebraska Community Action Partnership

603 Earl St.
PO Box 667
Pender, NE 68047

Type of Organization: Community Action Partnership agency

Source of Labor: Private Contractors and crew

Contact: Pam Browning Email: pbrowning@nencap.org

Phone: 402-385-6300 ext.274 Fax: 402-385-6310

Counties Served: Antelope Burt Cedar
 Cuming Dakota Dixon
 Dodge Knox Madison
 Pierce Stanton Thurston

Washington Wayne

PY2022-2026 BIL

USDOE Allocation: \$3,023,692.00

Minimum Units: 236

Congressional districts served and	<u>CD</u>	<u>Percent</u>
percent of Subgrantee allocation:	01	46%
	03	54%

Community Action Partnership of Lancaster and Saunders Counties

210 "O" Street
Lincoln, NE 68508

Type of Organization: Community Action Partnership agency

Source of Labor: Private Contractors

Contact: Beau Ault Email: bault@communityactionatwork.org

Phone: 402-471-4515 Fax: 402-471-4844

Counties Served: Lancaster Saunders

PY2022-2026 BIL

USDOE Allocation: \$2,915,971.00

Minimum Units: 227

Congressional districts served and	<u>CD</u>	<u>Percent</u>
percent of Subgrantee allocation:	01	94%
	02	6%

Community Action Partnership of Mid Nebraska

PO Box 2288
16 W 11th Street
Kearney, NE 68848-7440

Type of Organization: Community Action Partnership agency

Source of Labor: Private Contractors and Crews

Contact: Larissia Anders Email: landers@mnca.net

Phone: 308-865-5675 Fax: 308-865-5681

Counties Served:	Adams	Arthur	Buffalo	Chase	Clay
	Dawson	Dundy	Franklin	Frontier	Furnas
	Gosper	Grant	Harlan	Hayes	Hitchcock
	Hooker	Kearney	Keith	Lincoln	Logan
	McPherson	Nuckolls	Perkins	Phelps	Red Willow
	Thomas	Webster			

PY2022-2026 BIL

USDOE Allocation: \$3,066,781.00

Minimum Units: 240

Congressional districts served and	<u>CD</u>	<u>Percent</u>
percent of Subgrantee allocation:	03	100%

Northwest Community Action Partnership

270 Pine Street
Chadron, NE 69337

Type of Organization: Community Action Partnership agency

Source of Labor: Private Contractors and Crews

Contact: Brian Pankonin Email: bpankonin@ncap.info

Phone: 308-432-3393 Fax: 308-432-5799

Counties Served:	Banner	Box Butte	Cherry	Cheyenne	Dawes
	Deuel	Garden	Kimball	Morrill	Scotts Bluff
	Sheridan	Sioux			

PY2022-2026 BIL

USDOE Allocation: \$2,808,250.00

Minimum Units: 219

Congressional districts served and	<u>CD</u>	<u>Percent</u>
percent of Subgrantee allocation:	03	100%

Southeast Nebraska Community Action Partnership

P.O. Box 646
802 4th Street
Humboldt, NE 68376

Type of Organization: Community Action Partnership agency

Source of Labor: Private Contractors

Contact: Gin Christiansen

Email: gchristiansen@senca.org

Phone: 402-862-2411 ext.116

Fax: 402-862-2428

Counties Served: Cass Johnson Nemaha Otoe
Pawnee Richardson Sarpy

PY2022-2026 BIL

USDOE Allocation: \$1,784,899.00

Minimum Units: 140

Congressional districts served and
percent of Subgrantee allocation:

<u>CD</u>	<u>Percent</u>
01	42%
02	49%
03	9%

Habitat for Humanity of Omaha

1701 N 24th Street
Omaha, NE 68110

Type of Organization: 501(C)3 Non-profit entity

Source of Labor: Contractor

Contact: Jeremy Scarbrough

Email: jscarbrough@hatitaomaha.org

Phone: 402-884-6626

Fax: 402-457-4012

Counties Served: Douglas

PY2022-2026 BIL

USDOE Allocation: \$3,346,856.00

Minimum Units: 261

Congressional districts served and
percent of Subgrantee allocation:

<u>CD</u>	<u>Percent</u>
02	100%

IV.2 WAP Production Schedule

Average Unit Costs Including Re-weatherization	\$ 8,009.00
Total Funds – Federal	\$24,527,380.00
Total Units to be Weatherized	1685
Total Units to be Re-weatherized	168
Total Units to be weatherized and Re-weatherized	1853
Total Vehicle and Equipment Budget	<u>\$150,000.00</u>
Total Funds for Program Operations	\$13,490,961.00

IV.3 Energy Savings & Program Impact

Method Used to Calculate Savings: WAP Algorithm

Estimated Energy Savings: 29.3 MBtus per completed unit. Total annual estimated energy savings resulting from USDOE appropriated funds: 54,645 MBtus.

IV.4 USDOE-Funded Leveraging Activities

No leveraged funds are identified for this program year.

IV.5 Policy Advisory Council Members

As required by federal regulations, a Policy Advisory Council (PAC) assists in the development and implementation of the WAP and advises the Department of Environment and Energy on a broad range of issues relating to WAP. The PAC is broadly representative of organizations that provide services to low-income persons in Nebraska.

<u>Member</u>	<u>Representing</u>
Matt Thomsen	Elderly Nebraskans – Nebraska Department of Health & Human Services
Tina Rockenbach	Low Income Nebraskans – Community Action Nebraska
Karen Wobig	Elderly & Children (under six) – Lancaster County Extension Service
Jerry Bryan	Disabled -Nebraska Client Assistance Program
Lynn Kohout	Low Income Housing - Nebraska Dept of Economic Development
Steve Zach	Utility - Nebraska Public Power District
Misha Mazurkewycz	Native American representative, Ponca Tribe of Nebraska

IV.6 State Plan Hearings and Transcripts

Public Hearing

Department of Environment and Energy: Weatherization Assistance Program

DATE OF ACTIVITY

Wednesday, 09/28/2022

TIME OF ACTIVITY

10:00 AM

LOCATION

245 Fallbrook Blvd. Lower-Level Conference Room or,

Conference Access Number: (888)-820-1398.

Attendee Code: 9759718#

IV.7 Miscellaneous

Other Funding Sources

Low Income Home Energy Assistance Program (LIHEAP) funds have been directed into the weatherization program since 1982. LIHEAP funds are used in accordance with all applicable USDHHS and Nebraska Department of Health and Human Services State Plan rules and regulations.

Subgrantee Involved in the Leveraging Process

Most Nebraska Subgrantees operate other housing assistance programs that enable them to leverage resources from other funding sources.

Liability Insurance

Subgrantees that employ private contractor labor to perform Weatherization services must ensure that each private contractor is adequately insured.

V.1 Eligibility

Every dwelling weatherized must meet both the client eligibility and the building eligibility requirements.

V.1.1 Approach to Determining Client Eligibility

Definition of Income Used to Determine Eligibility (Client Eligibility)

In accordance with USDOE Weatherization Program Notice 22-3, or most recent active Federal Poverty Guidelines and Definition of Income, Low income will mean that income in relation to family size, which: (1) is at or below 200 percent of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget, or (2) is the basis on which cash assistance payments have been paid at any time during the preceding twelve months under Titles IV and XVI of the Social Security Act, or (3) is the basis on which energy assistance payments have been paid under the Low Income Home Energy Assistance Program of 1981(LIHEAP), provided that such basis is at least 200 percent of the poverty level determined in accordance with the criteria established by the Director of the Office of Management and Budget.

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

Procedures to Determine That Units Weatherized Have Eligibility Documentation (Household Eligibility)

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

Qualified Aliens Receiving Weatherization Benefits:

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

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

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

V.1.2 Approach to Determining Building Eligibility

Procedures to Determine that Units Weatherized Have Eligibility Documentation

Subgrantees are required to keep documentation in each client file for review during Program Compliance and Onsite Project monitoring visits by Department of Environment and Energy WAP staff. A minimum of 20 client files will be reviewed at each Subgrantee during Program Compliance monitoring to assess compliance with this requirement.

Re-weatherization Compliance

Subgrantees are required to retain records of all dwellings that received Federal funds including LIHEAP, HUD, or USDA "weatherization" activities. Dwellings may be reweatherized if 15 years have passed since the completion of original services and quality control inspection. Nebraska has been advised that additional implementation guidance of the new re-weatherization policy is forthcoming. Nebraska will ensure compliance with any additional DOE guidance.

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

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

Building Eligibility – Housing Types

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

Historic Preservation

On November 6, 2020, the NDEE extended the Programmatic Agreement (PA) with the Nebraska State Historical Preservation Office (NSHPO) and the USDOE until December 31, 2030. Properties funded under the WAP are considered “undertakings” subject to review under Section 106 of the National Historic Preservation Act, 16 U.S.C. 470f (NHPA) and its implementing regulations at 36 CFR 800, and include rehabilitation, energy efficiency, retrofits, renewables, and weatherization (undertakings). SHPO contact information is available at the following link: <http://www.ncshpo.org/shpodirectory.shtml> click on the State of Nebraska to find the Nebraska SHPO contact information.

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

Dwellings that may be weatherized include:

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

Rental and Multifamily Building Procedures

References to the specific eligibility of multifamily buildings is addressed in the regulations, 10 CFR 440.22(b)(2). Additional USDOE guidance can be found in USDOE Weatherization Program Notice 16-5.

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

- The Subgrantee has written permission from the owner or his agent. Such written permission shall be permanently maintained in the file of the client whose unit is weatherized.
- The benefits of weatherization assistance will accrue primarily to low-income tenants.
- Not less than 66 percent (50 percent for duplexes and four-unit buildings) of the dwelling units in the building are occupied by eligible clients or will become occupied by eligible clients within 180 days under a Federal, State, or local program for rehabilitating the building or making similar improvements to the building.
- The Subgrantee must obtain and place in the client file a signed agreement from the landlord (or authorized agent of the landlord) that states that for a minimum of 12 months after weatherization work has been completed on a dwelling, the tenants in that dwelling will not be subjected to rent increases because of the increased value of dwelling units due solely to weatherization assistance provided under this part.
- No undue or excessive enhancement shall occur to the value of the dwelling units.

- In the event of a dispute between the tenant and property owner regarding the issues listed above, the Subgrantee will attempt to resolve the dispute; if that fails, the tenant will be referred to legal aid by the Subgrantee.
- In the case of a vacant rental dwelling, weatherization assistance may be provided if there is assurance that a low-income household will inhabit the dwelling within 180 days of the date the weatherization service was completed.
- Subgrantee has provided copies of the signed Landlord Agreements to the tenants and ensure that documentation is placed in the Subgrantee Client File.

The Nebraska WAP does not file liens or enforce restrictions.

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

Multi-family Buildings

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

Deferral Process

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

V.1.3 Definition of Children

Children are defined as those individuals under the age of six.

V.1.4 Approach to Tribal Organizations

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

V.2 Selection of Areas to be Served

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

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

Formula to calculate Subgrantees allocation

Weighted average based on population.

$$0.1 \times \frac{\{Population (C)\}}{\{Population (S)\}} + 0.2 \times \frac{\{200\% \text{ of Poverty } (C)\}}{\{200\% \text{ of Poverty } (S)\}} + 0.3 \times \frac{\{Poverty(C)\}}{\{Poverty (S)\}} + 0.4 \times \frac{\{Elderly(C)\}}{\{Elderly (S)\}}$$

C = County S= State

Subgrantees under the WAP were required to notify the NDEE by February 11, 2022 of their interest in continuing as a service provider. At the time of submitting Subgrantee letter of intents to provide weatherization service in their specific counties, they will also submit any changes to: Articles of Incorporation, Mission Statement, key agency personnel, Board of Directors and representation, organizational chart, and proposed staffing levels. The application must also address:

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

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

V.3 Priorities for Service Delivery

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

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

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

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

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

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

Prioritization of Single Family Homes and High Energy Users

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

Climatic Conditions

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

Blue Valley Community Action Partnership (Lincoln)	6056
Central Nebraska Community Services (O'Neill)	7151
Northeast NE Community Action Partnership (Norfolk)	6643
Community Action Partnership of Lancaster & Saunders Counties (Lincoln)	6056
Community Action Partnership of Mid Nebraska (North Platte)	6686
Northwest Community Action Partnership (Chadron)	6775
Southeast NE Community Action Partnership (Pawnee City)	5844
Habitat for Humanity of Omaha (Omaha)	6506

V.4 Types of Weatherization Measures to be Done

As a result of experience and research in weatherizing several thousand site-built and mobile homes in Nebraska, including substantial use of the National Energy Audit Tool (NEAT) and the Mobile Home Energy Audit (MHEA), weatherization measures are mandated for use by all Subgrantees under contract with the NDEE to perform weatherization in Nebraska. The primary goal of the weatherization program remains the conservation of energy with emphasis on insulation, furnace replacement, and air sealing.

FRAME HOUSING

Health and Safety Measures

General Heat Loss Measures

Envelope Insulation Measures

Baseload Measures

MANUFACTURED HOMES

Health and Safety Measures

General Heat Loss Measures

Envelope Insulation Measures

Baseload Measures

V.4.1 Technical Guides and Materials

The Nebraska WAP network will utilize the 2021 Retrofitting Nebraska(Or most updated DOE Approved Standards): Standard Work Specifications for Single Family Homes and Manufactured Homes along with the Installation Standards for Single Family and Manufactured Homes that were issued to Subgrantees in June 2021. NDEE informed Subgrantees at that time of the expectations for work quality and adherence to the Field Guide and Installation Standards. NDEE implemented the Nebraska Field Guide and Installation Standards after approval by the Department of Energy in Program Year 2021 and will be in effect for five (5) years as Nebraska's technical guides. The Nebraska Field Guide and Installation Standards manual aligns with the USDOE Standard Work Specifications and are the work quality standards that will meet the technical requirements for the WAP outlined in USDOE WPN 19-4, Section 2 and 10 CFR 440.

Each Subgrantee, by signing their Financial Aid Agreement with NDEE, agrees they understand the expectations of the Nebraska Field Guide and Installation Standards, USDOE WPN 19-4, energy audit procedures and 10 CFR 440 including Appendix A. By signing this agreement Subgrantees will also be acknowledging that they will include these expectations within their contract agreements.

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

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

V.4.2 Energy Audit Procedures

Approval of Energy Audit Procedures

On June 2, 2021, NDEE received USDOE approval, of its audit procedures for site built and for certain small multifamily buildings using the NEAT and for manufactured homes using the MHEA. Both audit tools are already USDOE approved to calculate savings-to-investment (SIR) ratios. NDEE followed the latest WPN 19-4 guidance to comply with 10 CFR 440 for re-approval.

Single Family -- National Energy Audit (NEAT)

The National Energy Audit (NEAT) has been adopted by the Nebraska weatherization program. The U.S. Department of Energy's most recent approved Nebraska's Audit procedures with added User Defined measures was on June 2, 2021. Site-specific audits must be run on all single-family frame homes for all homes weatherized with Nebraska WAP funds

Manufactured Housing - Mobile Home Energy Audit (MHEA)

Nebraska has chosen to utilize the Manufactured Home Energy Audit (MHEA). Site-specific audits must be completed on all mobile homes weatherized with Nebraska WAP funds. The MHEA Audit was approved with User Defined Measures by USDOE on June 2, 2021.

Multi-family Energy Audits

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

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

Savings to Investment Ratio

A SIR of 1.0 or greater means that the expected energy savings from installing the measure is equal to or greater than the initial cost of installation.

When an individual Measure SIR is not reached in multi-family (3 units and larger) building owners are allowed to buy-down DOE approved NEAT/MHEA Candidate Measures for Building Envelope and/or Baseload Energy Conservation Measures (ECMs) measures that don't achieve an individual SIR of 1 or greater as a stand-alone measure. However, in order for the measure(s) to qualify for a buy-down, the package of measures, **including the full cost of the Measure, which is to be bought down**, must have a Cumulative SIR (CSIR) of 1 or greater. **Note: Funding may not be solicited from an income-eligible homeowner. Homeowners may not contribute funds to pay the difference for a measure with an SIR of less than 1.0.**

Opting Out or Skipping Cost-effective Weatherization Measures

Opting out, skipping or "leapfrogging" of Measures that have been determined by the Energy Audit to be cost-effective is not allowed. Completion of all measures with an SIR of 1.0 or greater is required and all energy-savings measures must be considered and ranked in order of descending SIR. **The higher the SIR, the higher the priority.** Higher-ranking measures may not be skipped in order to complete a measure with a lower SIR. In other words, measures may not be skipped and/or clients cannot 'opt' out of a measure.

V.4.3 Final Inspection – Quality Control

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

Subgrantees will be required to meet USDOE WPN 22-4 Quality Work Plan requirements and to meet Quality Control Inspector (QCI) Certification requirements. QCI work must meet or exceed standards specified in the Nebraska Standard Work Specification Field Guide and Installation Standards. Documentation is required to be kept in each client file as evidence that a final inspection has been performed by a Certified QCI. NDEE Program Monitors review client files as part of the Subgrantee monitoring to ensure compliance with this requirement. When a unit has received a QCI by the Subgrantee agency and has been monitored by a NDEE Field Conservation Technical staff, both QCI inspection forms will be included in the client file or building file.

Subgrantee agencies operating with a combined Energy Auditor and QCI will be involved in a higher quality assurance review by NDEE above ten (10) percent of all completed units. Subgrantees operating with separate Energy Auditors and QCIs will have at least five (5) percent of all completed units reviewed. Subgrantees using one person to perform both the Energy Audit and the QCI are not allowed to utilize that person to perform weatherization work on a dwelling. Subgrantees using one person as Energy Auditor and one person as QCI can allow the Energy Auditor to perform weatherization work on a dwelling, while the QCI is not allowed to perform any weatherization work on a dwelling.

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

V.5 Weatherization Analysis of Effectiveness

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

During the application process the Subgrantees secure a signed Client Consumption Release Form which authorizes the Subgrantees to obtain the consumption records for each household for a 12-month period prior to weatherization (pre-consumption) and for a 12-month period after weatherization (post-consumption). The 30-year normalized client pre- and post-consumption data, based on fuel type, is used to calculate the percentage of energy consumption savings achieved.

For the period of July 2019 to June 2020, consumption on 47 homes was evaluated and the data showed an average savings for natural gas at 19.21 percent and an average savings for electricity at 7.59 percent. In comparison to the USDOE National Evaluation results:

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

The PY 2019 State of Nebraska analysis shows the annual energy savings for electricity remains comparable to the National Evaluation results for 2008 and 2010.

Nebraska is in the process of collecting and reviewing data for July 2020 to June 2021 to continue to evaluate the annual energy savings of Subgrantees weatherization work and to work with our state database developers to automate the evaluation program. These activities will continue to assist the Department of Environment and Energy in evaluating program effectiveness as well as help in identifying technical training needs or the effectiveness of training during that period.

Other Analysis of Effectiveness

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

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

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

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

V.6 Health and Safety Plans

See State of Nebraska Health & Safety Attachment

V.7 Program Management

V.7.1 Overview and Organization

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

V.7.2 Administrative Expenditure Limits

10 CFR §440.18(e) permits Subgrantees receiving less than \$350,000 in federally appropriated Low Income WAP funds to receive up to an additional 5% share of administrative funds.

V.7.3 Monitoring Activities

See State of Nebraska Training and Technical Assistance Plan Attachment

V.7.4 Training and Technical Assistance Approach and Monitoring Activities

See State of Nebraska Training and Technical Assistance Plan Attachment

V.8 Energy Crisis and Disaster Plan

Nebraska will not use any grant funds for energy crisis relief.

TRAINING AND TECHNICAL ASSISTANCE (T&TA) PLAN TEMPLATE

1.0 – GENERAL INFORMATION

COMMENTS THAT DO NOT GENERALLY FIT INTO THE AVAILABLE TABLES BELOW

ENTER ADDITIONAL H&S INFORMATION HERE

- The subgrantees will be required to submit new T&TA budget plans for their T&TA allocation.
- Not all training outlined will be paid with DOE funds. We will be using LIHEAP funding to cover some of the training costs.

2.0 – OVERALL T&TA PLAN

YOUR OVERALL T&TA PLAN MUST INCORPORATE SUGGESTIONS AND FEEDBACK THE FOLLOWING ELEMENTS.

FEEDBACK FROM INTERNAL AND EXTERNAL REVIEWS, EXAMPLES INCLUDE:

- FEEDBACK FROM DEPARTMENT OF ENERGY (DOE) PROJECT OFFICER (PO) MONITORING VISITS
- INTERNAL STATE AUDITS
- GRANTEE MONITORING OF THE SUBGRANTEES
- OFFICE OF INSPECTOR GENERAL (OIG) REPORTS
- AMERICAN CUSTOMER SATISFACTION INDEX FEEDBACK, AND
- OTHER. EXAMPLES INCLUDE:
 - TRAINING FEEDBACK
 - TRAINING RETENTION ACTIVITIES
- The NeWAP Network strives to provide our clients with work that meets the most progressive industry standards and technologies. Meeting this goal requires that everyone within the network work to provide staff with the best training options and formats available. Those training formats and options that meet the requirements of the various job types/descriptions within the network including, but are not limited to:
 - Federal and regional training workshops and conferences,
 - Job specific on-line trainings,
 - Quarterly NeWAP Technical Working Group meetings/trainings that cover:
 - programmatic and technical changes,
 - issues or concerns being noted through in-filed monitoring and/or Energy Audit Reviews
 - issues or concerns being noted as part of the annual energy consumption evaluation
 - changes, updates or concerns associated with the NeWAP database system
 - In-field trainings incorporated into the In-Progress Monitoring completed by the WAP Technical Monitors

EXISTING OR PLANNED ACCREDITED TRAINING CENTER PARTNERSHIP OR WORKING RELATIONSHIP.

At this time, the Nebraska WAP (NeWAP) network has a BPI Certified Quality Control Inspector at all but one Subgrantee and, until in-house program staff receives their certification, the Subgrantee has contracted inspections with an individual with the required QCI Certifications. Additionally, the majority of Subgrantees have an experienced Energy Auditor on staff, a number of which are BPI Certified or in the process of earning their certification. The relatively low demand for additional Energy Auditor and/or Quality Control Inspector training in Nebraska makes it more cost-effective for the NeWAP to outsource this training and testing to IREC Accredited Programs with BPI Energy Auditor/QCI Certified trainers, testers and facilities to receive quality training. Historically NeWAP BPI certified staff have met these Comprehensive Training requirements through Santa Fe

Community College, the Energy and Environmental Training Center of Kansas City, the Montana Weatherization Training Center or Indiana Community Action Association and those working relationships will continue.

PREPARATIONS FOR FUTURE/UPCOMING PROGRAM REQUIREMENTS, EXAMPLES INCLUDE:

- **UPDATED STANDARD WORK SPECIFICATIONS (SWS)**
- **MIGRATION TO ONLINE WEATHERIZATION ASSISTANT**
- **INCLUSION OF SPECIFIC LANGUAGE FROM WEATHERIZATION PROGRAM NOTICES (WPN)**

- The Nebraska WAP Retrofitting Nebraska Installation Standards for Single Family and Manufactured Housing Field Guide was submitted to DOE for review and approved and the NeWAP received an *Updated Approval of the State of Nebraska Energy Audit Procedures for Site-Built Single Family, Manufactured Housing, and Small Multi-Family for the Weatherization Assistance Program* with an Effective Date of 6/2/2021 and an Expiration Date of 6/2/2026. Nebraska Grantee staff provided all subgrantees with electronic copies of the approved 2022 Field Guide and Installations and the updated NeWAP Policies and Procedures in a Technical Working Group meeting.
- When the anticipated ORNL NEAT and MHEA program is migrated to the web the Nebraska WAP grantee staff will:
 - Identify a member of the Grantee staff, or contract with an individual with appropriate WAP experience and certifications, to work with representatives of Oakridge National Laboratory (ORNL) as a Training Provider for the Nebraska WAP and to provide input on curriculum development, to participate in the ORNL train-the-trainer events.
 - Schedule, participate in and facilitate in the trainings of Subgrantee QCI and Energy Auditor staff.
- All Weatherization Program Notices are provided to the Subgrantee's Weatherization Program Managers for the appropriate dissemination among their staff. WPN information requiring specific language or field work changes will be distributed to all Subgrantee management through monthly Subgrantee virtual meetings. Information will also be provided to technical staff in quarterly Technical Working Group meetings or if needed in **Specific** "hands-on" trainings throughout the program year.

WHAT PROTOCOLS ARE IN PLACE WHICH ENSURE UNTRAINED STAFF ARE NOT LEFT WITHOUT SUPERVISIONS DURING FIELD OPERATIONS?

The Nebraska WAP requires Grantee, Subgrantee or sub-contracted staff, paid with weatherization funds, be supervised for all work activities until all appropriate training is completed and/or certification requirements are met. No untrained, unsupervised field staff are allowed on-site to perform weatherization activities. Below are the training/certifications requirements for completing on-site work without direct supervision:

- **Energy Auditor/QCI Staff:**
 - Each Subgrantee to have on staff at least one BPI Energy Auditor (EA)/Certified Quality Control Inspector (QCI) or contract inspections with an individual(s) with the required EA/QCI Certifications. Subgrantees replacing or hiring new EA/QCI staff must be certified or have the knowledge, skills and abilities to meet the Job Task Analysis (JTA) requirements and to secure their certification within six months of their hire date.
- **Field Staff:**
 - All existing field staff must have been trained, or in the case of new hires be trained, in the appropriate training covering their appropriate JTA, as developed by BPI, through the NeWAP developed Badges Program or an IREC certified facility (on-line or in-person).
 - Replacement or new hires must receive their training within six months of their hire date and be supervised by trained and/or certified staff until such time that skills are satisfactorily

- demonstrated, and any required certifications are received.
- All existing technical and field staff must be RRP Certified. Subgrantees replacing or hiring new technical, or field chief staff must be certified or have the knowledge, skills and abilities to secure their certification within six months of their hire date or be supervised by RRP trained/certified staff until such time certification is received.
- Training will be made available to all field staff as per Section 4.0.

PARTNERSHIPS WITH THE STATEWIDE HOME PERFORMANCE INDUSTRY ON TRAINING ISSUES; IF APPLICABLE.

The NDEE Training and Technical Assistance plan reflects the current DOE Energy Auditor/Quality Control Inspector Weatherization Assistance Program initiatives while looking forward to implementing future program requirements that will allow Nebraska’s WAP network to meet all of the BPI Home Energy Professional Certifications. During PY2022-2026 BIL and beyond, the Nebraska WAP will make all training opportunities available, for a fee that covers the cost of the training, to individuals, organizations and other interested parties that are not members of the Nebraska WAP Network.

HOW DOES ANALYSIS CONDUCTED, AS DETAILED IN SECTION V.6 OF THE ANNUAL APPLICATION, INFLUENCE THE DEVELOPMENT OF T&TA ACTIVITIES AND PRIORITIES?

- Program technical monitoring activities (in-progress and QCI) provide NDEE Monitors the opportunity to note and document specific Subgrantee, crew or contractors’ inconsistencies or concerns and provide/schedule on-site or Specific trainings to help alleviate any deficiencies. Examples of these types of past training opportunities include sidewall core density testing, CAZ testing (on-site and in group format) with newer, less experienced field staff, and on-site blower door testing with crews/contractors that have provided dubious testing results.
- The results of the Nebraska WAP Annual Consumption Evaluations are provided to all program Subgrantees during one of the program’s quarterly Technical Working Group (TWG) meetings. The individual Subgrantee, as well as the state-wide, results are discussed with technical staff to evaluate “trends” being experienced by specific Subgrantees or within the program as a whole. Following the TWG meeting each agency is provided with each of their reviewed client charts, that shows the energy use impact of the weatherization services on their home. Subgrantee’s review the client file associated with the chart(s) provided to help to educate their crews and/or contractors regarding the impact of the completed work and to address non-beneficial trends that they may be experiencing. The results of the Nebraska WAP Annual Consumption Evaluation are used by NDEE to develop training options or focus on missed energy-efficiency opportunities within the network to ensure upward savings trends. (i.e. providing trainings/information regarding ASHRAE 62.2 calculations and adding Refrigerator Replacement as an additional electric savings ECM when the percentage of state-wide electric savings was reduced in conjunction with the full program implementation of ASHRAE 62.2).

3.0 – WORKFORCE CREDENTIALS

DESCRIBE THE FOLLOWING ASPECTS OF YOUR T&TA PLAN RELATED TO WORKFORCE CREDENTIALS.

FEDERALLY REQUIRED CREDENTIALS. EXAMPLES INCLUDE:

- ENVIRONMENTAL PROTECTION AGENCY LEAD RENOVATION, REPAIR, AND PAINTING PROGRAM
- HOME ENERGY PROFESSIONALS QUALITY CONTROL INSPECTOR CERTIFICATION

- The Nebraska WAP requires each Subgrantee to have on staff at least one BPI Certified Quality Control Inspector or to contract inspections with an individual(s) with the required QCI Certifications.

<ul style="list-style-type: none"> ○ The Nebraska WAP requires all existing Subgrantee technical, field staff and, contractors to be RRP Certified. ○ The Nebraska WAP requires all Subgrantee technical and field staff to be trained in the appropriate training covering the Home Energy Professional Certifications, as developed by BPI, that most closely represents their job duties.
GRANTEE/STATE REQUIRED CREDENTIALS. EXAMPLES INCLUDE:
<ul style="list-style-type: none"> ● BUILDING PERFORMANCE INSTITUTE BUILDING ANALYST ● GRANTEE-DEVELOPED CERTIFICATIONS
<p>The Nebraska WAP has no additional national or Grantee-developed credentialing requirements.</p>
SUBGRANTEE/LOCAL REQUIRED CREDENTIALS. EXAMPLES INCLUDE:
<ul style="list-style-type: none"> ● CONTRACTOR LICENSING
<p>The State of Nebraska currently does not require state-wide or local jurisdictional licensing of contractors, excluding electricians, but numerous local jurisdictions do have local licensing requirements for specific construction trades that are involved in implementing weatherization work. NeWAP Policies and Procedures require subgrantees to develop and maintain a separate contractor file for each contractor that includes a checklist(s) of all required documentation to assist in NDEE and/or federal monitoring reporting. Required documentation includes, but is not limited to: General Liability Insurance, Proof of Worker’s Compensation Insurance or documentation of Sole Proprietorship with no employees, current signed contract, Current Contractor’s Registration with the State of Nebraska, Current Electrical, Plumbing and Mechanical Licenses (as applicable) Proof of being a Lead Renovator Firm and Proof of Completing Lead Renovator Training.</p>
INDUSTRY REQUIRED CREDENTIALS. EXAMPLES INCLUDE:
<ul style="list-style-type: none"> ● EQUIPMENT/MATERIAL MANUFACTURE CERTIFICATION ● VENDOR CERTIFICATION <p>(E.G. EQUIPMENT/MATERIAL MANUFACTURE CERTIFICATION, VENDOR CERTIFICATION)</p>
<p>The Nebraska WAP has no additional equipment, vendor or manufacturer credentialing requirements.</p>
PROCESS FOR MAINTAINING WORKFORCE CREDENTIALS
<p>The Nebraska WAP incorporates the following into the NeWAP Policies and Procedures Manual to help ensure and/or maintain Subgrantee staff workforce credentials:</p> <ul style="list-style-type: none"> ○ Subgrantees replacing or hiring new QCI staff must be certified or have the knowledge, skills and abilities to meet the JTA requirements and to secure their certification within six months of their hire date. ○ When subgrantees replace or hire new field staff they must be trained in the appropriate JTA, as developed by BPI, through an IREC facility (on-line or in-person) within six months of their hire date. ○ Subgrantees technical staff replacement or new hires must receive training, in the Home Energy Professional Certifications, as developed by BPI, that most closely represents their job duties within six months of their hire date.
HOW CREDENTIALS ARE TRACKED
<ul style="list-style-type: none"> ○ NDEE has maintained spreadsheets that track all attendees of trainings that have been provided through the Nebraska WAP network since 2010 and additional spreadsheets has been developed to track all Nebraska WAP network staff member trainings (per Subgrantee) who have completed additional virtual trainings or have received BPI QCI and EA Certifications. ○ NDEE communicates in quarterly Technical Working Group meetings with Subgrantees regarding their staff training needs and possible new hire training requirements and will also collect individual

Subgrantee training information requiring specific language or field work changes will be distributed to all Subgrantee management through monthly Subgrantee virtual progress and update meetings.

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

4.0 – TRAINING

GRANTEES HAVE TWO OPTIONS TO DESCRIBE THEIR TRAINING.

- A) USE THE EMBEDDED SPREADSHEET* TO IDENTIFY AND DESCRIBE THE TRAINING SCHEDULE FOR GRANTEE AND SUBGRANTEE STAFF. INCLUDE TECHNICAL AND NON-TECHNICAL TRAINING.
- B) OR USE THE FIELDS BELOW TO IDENTIFY AND DESCRIBE THE TRAINING SCHEDULE FOR GRANTEE AND SUBGRANTEE STAFF. INCLUDE TECHNICAL AND NON-TECHNICAL TRAINING.

GRANTEE'S ARE TO INCLUDE THE FOLLOWING IN THEIR DESCRIPTIONS REGARDLESS OF WHAT OPTION IS BEING USED TO DESCRIBE THEIR TRAINING PLAN:

- SPECIFY WHETHER ATTENDANCE IS MANDATORY, AND THE RAMIFICATIONS FOR NON-COMPLIANCE.
- SPECIFY IF THE T&TA PLAN SPANS MULTIPLE PROGRAM YEARS (PY), INDICATE WHICH TRAININGS ARE INTENDED IN THE CURRENT PY AND WHICH ARE PLANNED FOR FUTURE PYS.

* THE EMBEDDED SPREADSHEET, IF COMPLETED AT THE END OF THE YEAR TO RECORD DELIVERED TRAINING, CAN BE USED AS DOCUMENTATION FOR THE REQUIRED ANNUAL T&TA REPORT. DOUBLE CLICK TO OPEN SPREADSHEET. ENTER INFORMATION AND CLOSE. IT WILL AUTOMATICALLY SAVE YOUR INFORMATION



TTA Planning and Reporting Template F

PROGRAMMATIC/ADMINISTRATION TRAINING

- FINANCIAL (I.E. 2 CFR 200)
- MANAGEMENT (I.E. 10 CFR 440)
- Meeting NeWAP production and quality goals requires everyone within the network work to provide staff with the best training options and formats available. Those training formats and options that meet the requirements of program management and fiscal job types/descriptions within the network including, but are not limited to:
 - Federal and regional training workshops and conferences regarding the requirements associated with 2 CFR 200 and 10 CFR 440,
 - Quarterly NeWAP Technical Working Group (TWG) meetings/trainings that cover programmatic updated regarding Weatherization,
 - Subgrantees who have attended relevant conferences will be asked to provide a brief description of relevant issues at the TWG following the conference, issues, changes, updates or concerns

associated with the NeWAP database system and information submittal is address as part of the annual Fiscal Monitoring

- The NDEE is currently working on setting up a version of the NASCSP “WAP E-News” email newsletter to update the Network on Programmatic issues and to develop a FAQ Section.

COMPREHENSIVE TECHNICAL TRAINING ALIGNED TO THE JOB TASK ANALYSIS (IDENTIFY AT WHAT INTERVALS WORKERS WILL RECEIVE REGULAR, COMPREHENSIVE TRAINING AS REQUIRED BY WEATHERIZATION PROGRAM NOTICE (WPN) 15-4)

- QUALITY CONTROL INSPECTOR
- ENERGY AUDITOR
- CREW LEAD
- RETROFIT INSTALLER/TECHNICIAN

The Nebraska WAP is committed to increasing the network’s expertise and numerous program technical training opportunities and hands-on workshops have been conducted with the goal to maximize energy savings, minimize production costs, improve quality of work, and foster management expertise.

Comprehensive Training will be delivered to the network state-wide as per the attached NeWAP BIL Plan Workbook.

Energy Auditor/Quality Control Inspectors:

As a result of this commitment, each Subgrantee in the Nebraska WAP network has on staff at least one BPI Certified Energy Auditor (EA)/ Quality Control Inspector (QCI), or contracts inspections with an individual(s) with the required EA/QCI Certifications, and the majority of have an experienced Energy Auditor (BPI Certified) on staff. Any additional required Energy Auditor/Quality Control Inspector trainings will be outsourced to facilities where the network can receive quality training by an IREC Accredited Program with BPI Certified Trainers and Testers where Certification in these areas can be provided. The low demand for the Energy Auditor and Quality Control Inspector training in Nebraska makes it more feasible to outsource these training at random intervals, as needed, at this time.

Installer and Crew Chief Field Staff:

With the development of the Installer Badges Toolkit, in PY 2021 the NeWAP contracted with an individual familiar with all aspects of WAP, to develop the Installers Badges Toolkit for inclusion in the Nebraska WAP. In years of PY 2022-2026 BIL the contractor will complete their development work and an on-line training/tracking database tool will be developed.

Grantee staff will work to with the database contractor and subgrantee technical staff to develop and integrate into the network the verification system for tracking which badges trainees have earned. Additionally, Grantee staff will make recommendations to NDEE management for additional “badges” to be incorporated and assist in their development and implementation.

Subgrantees will also be encouraged to include eligible field staff in weatherization industry conferences, trainings and workshops to help to ensure that the Nebraska Network operates to meet the most progressive industry standards and technologies.

SPECIFIC TECHNICAL TRAINING

- TOPICS IDENTIFIED DURING MONITORING VISIT(S)
- ENERGY MODELING
- HEALTH & SAFETY. ALL H&S TOPICS IN WPN 17-7 REQUIRE SOME LEVEL OF TRAINING FOR ALL AFFECTED WORKERS, THE FREQUENCY OF THIS TRAINING IS A GRANTEE DECISION. EXAMPLES INCLUDE:

- AIR CONDITIONING AND HEATING SYSTEMS
- ASBESTOS
- BIOLOGICALS AND UNSANITARY CONDITIONS
- BUILDING STRUCTURE AND ROOFING
- CODE COMPLIANCE
- COMBUSTION GASES
- ELECTRICAL
- FORMALDEHYDE, VOLATILE ORGANIC COMPOUNDS (VOCs), FLAMMABLE LIQUIDS, AND OTHER AIR POLLUTANTS
- FUEL LEAKS
- GAS RANGE/OVENS
- HAZARDOUS MATERIALS DISPOSAL
- INJURY PREVENTION OF OCCUPANTS AND WEATHERIZATION WORKERS
- LEAD BASED PAINT
- EPA'S LEAD RENOVATION, REPAIR & PAINTING PROGRAM (RRP)MOLD/MOISTURE
- PESTS
- RADON
- SAFETY DEVICES
- VENTILATION AND INDOOR AIR QUALITY
 - AMERICAN SOCIETY OF HEATING REFRIGERATION AND AIR-CONDITIONING ENGINEERS (ASHRAE)
- WINDOW REPAIR, DOOR REPAIR
- WORKER SAFETY
 - OSHA
- ADDITIONAL TOPICS AS DESCRIBED IN HEALTH & SAFETY PLAN
- CLIENT EDUCATION (TRAINING WORKERS TO CONDUCT CLIENT EDUCATION). EXAMPLES INCLUDE:
 - ENERGY SAVINGS STRATEGIES
 - PROGRAM-SPECIFIC INFORMATION. EXAMPLES INCLUDE:
 - WHAT TO EXPECT
 - ADDITIONAL RESOURCES
 - HEALTH & SAFETY ISSUES

Subgrantee technical staff:

Specific Training will be delivered to the network state-wide as per the attached NeWAP BIL Plan Workbook.

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

Additionally, specific training needs will be addressed as identified during inspections and monitoring completed by NDEE Technical Monitors, the Building Program Specialist, Fiscal Compliance Analyst, NDEE Grant Section Supervisor and USDOE Project Officers.

CONFERENCES. EXAMPLES INCLUDE:

- ENERGY OUTWEST
- BUILDING PERFORMANCE ASSOCIATION
- NATIONAL ASSOCIATION FOR STATE AND COMMUNITY SERVICE PROVIDERS
- COMMUNITY ACTION PARTNERSHIP

NDEE Technical Monitors, Building Program Specialist and Subgrantee Technical Staff will attend (as needed) weatherization industry conferences, trainings and workshops to ensure that the Nebraska Network operates to meet the most progressive industry standards and technologies and to meet EA/QCI re-certification CEU requirements. Information provided as part of those trainings will be shared with all members of the Nebraska WAP through various training activities, Quarterly Technical Working Group meetings and onsite inspections.

NDEE and Subgrantee management and fiscal staff will attend industry related conferences, trainings, workshops and grant management webinars to increase their knowledge, skills and abilities in grant administration. An example would be continued participation in training and webinars that address grant administration, such as the NASCSP Annual Conference and the Energy Out West Conference.

OTHER, PLEASE SPECIFY:

With the development of the Installer Badges Toolkit, in PY 2021 the NeWAP contracted with an individual familiar with all aspects of WAP, to develop the Installers Badges Toolkit for inclusion in the Nebraska WAP.

In year of PY 2022-2026 BIL the Nebraska WAP will utilize T&TA funding to contract for the development of on-line training/tracking database tool to integrate into the network the verification system for tracking which badges trainees have earned. Additionally, Grantee staff will make recommendations to NDEE management for additional “badges” to be incorporated and assist in their development and implementation.

5.0 – TECHNICAL ASSISTANCE

DESCRIBE THE TECHNICAL ASSISTANCE ACTIVITIES INCLUDED IN THE T&TA BUDGET CATEGORY.

PROGRAMMATIC/ADMINISTRATION SUPPORT

Technical Monitors, a Building Program Specialist, a Fiscal Compliance Analyst and the Grants Section Supervisor are responsible for providing technical assistance, completing monitoring and evaluating the operation of the Nebraska WAP Subgrantees. NDEE believes that strong internal systems, oversight, training and technical assistance are essential to enable Subgrantees to achieve the objectives of the Nebraska WAP and will ensure quality weatherization work and adequate financial and programmatic management controls. NDEE combines onsite inspections on in-progress units with an extensive training and technical assistance program and administrative, fiscal and technical monitoring to identify areas where more specific training is required to:

- improve work quality,
- improve delivery of program services, and
- to correct Subgrantee administrative and management problems.

TECHNICAL SUPPORT

NEWAP Technical Monitors and the Building Program Specialist are responsible for completing inspections and providing technical assistance activities as part of the Program Monitoring and Compliance Strategy. Technical assistance provided may include but is not limited to:

- staff training,
- policy interpretation,
- State Plan and Field Guide & Installation Standards clarification,
- working with Subgrantees to address deficiencies, and
- training Subgrantees on new and existing weatherization techniques.

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

Technical Monitoring activities includes but are not limited to:

- **Onsite Inspection of In-progress Units** completed by NDEE Technical Monitors that are BPI Certified Quality Control Inspectors to provide technical guidance or assistance to Subgrantees and to verify compliance with program installation requirements. Some Subgrantees are monitored each month, while others are monitored more infrequently depending on production and identified needs to address quality and/or health and safety concerns. A minimum of 10 percent of weatherized homes for each Subgrantee will be completed with additional inspections completed if recurring inconsistencies are experienced.
- **Quality Control Inspections** on units submitted for reimbursement to NDEE as per Section 3 of WPN 15-4. These inspections will include, but not be limited to diagnostic testing, client file review and energy audit review. Five (5) percent or greater of all completed units will be inspected for each Subgrantee that utilizes a separate Energy Auditor and Quality Control Inspector. Ten (10) percent or greater of all completed units will be inspected for each Subgrantee that utilizes one person to perform both the Energy Auditor and Quality Control Inspections.
- **File Review Monitoring** completed on every weatherized home receiving an In-Progress or Quality Control Inspection.
- February 1, 2018, NDEE implemented a more accountable process for NeWAP Technical Monitoring reporting and follow-up procedures. NDEE Technical Monitors started a process where after they have completed an in-progress monitoring or a QCI monitoring visit, they write-up a report to the Subgrantee identifying any findings, concerns, recommendations, commendations, or best practices, and identify any corrective actions that are required. The report will be reviewed and signed by the NDEE Grant Section Supervisor and sent to the Subgrantee within 30 days of the monitoring visit. The Subgrantee has 30 days to respond and resolve any corrective actions if needed. NDEE will utilize a tracking spreadsheet and use the NDEE online database to ensure all follow-up on Technical Monitoring has been completed in a timely manner.

The NDEE Building Program Specialist completes a **Desktop Energy Audit Review** on review on ten (10) percent of weatherized home. The audits are reviewed to ensure that the appropriate audit tool is used, input values are in accordance with program requirements, energy efficiency measures identified based on SIR's are implemented, etc. Issues and concerns associated with the reviews are discussed in Technical Working Group and any procedural changes are incorporated into the audit process.

Administration/Fiscal Compliance Monitoring is an extremely important aspect of weatherization program management and NDEE believes that a successful monitoring program improves Subgrantee operations, identifies problems early enough for corrective action, promotes quality work and is essential in assisting Subgrantees in fulfilling program objectives.

- The Fiscal Compliance Analyst conducts an Administrative/Fiscal Compliance Monitoring annually with each Subgrantee consisting of both an administrative review and a fiscal review. Prior to monitoring the Fiscal Compliance Analyst will review the Subgrantees required annual audit and previous year's Administration and Fiscal Compliance Monitoring to ensure the Subgrantee has resolved any findings from these audits and monitoring.
The financial review will include:

1. A check of the contract files against contract procedures
 2. Sample journal entries
 3. Inventory reconciliation
 4. Cost categories
 5. Administrative expenses
- The program administration review will include:
 1. The outreach support level and client application process
 2. Reviewing client files for compliance with all federal and state WAP rules and regulations regarding mandated documentation of: household income, client certification of eligibility, owner/landlord permission for weatherization, rent declaration, fuel release statement, inspection statement, lien/debt statement, a complete Building Check & Job Order form/site-specific audit, complete material cost information, funding source designation, final quality control inspection and client release
 3. Client certification and prioritization system
 4. Inspection/quality control systems
 5. Subcontracting system
 6. Review of goals for serving elderly, disabled, and families with Children under 6 years old, high-energy use and high-energy burden
 7. Review of procurement systems
 - A minimum of 10% of all USDOE BIL unit client files completed in the time period being reviewed during the Program Compliance Administrative/Fiscal Monitoring visit will be examined. NDEE staff will review Subgrantee management systems to ensure compliance with rules, regulations, and mandated file documentation. Material records will be examined and inventory will be inspected to verify the adherence to Federal specifications. The financial review will encompass the examination of all completed programs not previously reviewed.
 - NDEE will issue a report within thirty (30) calendar days to the Weatherization Program Director, Agency Executive Director and the Board President detailing the monitoring findings along with recommendations for Subgrantee improvement. The Subgrantee is required to respond within thirty (30) calendar days with a corrective action plan that includes steps to be taken to address findings identified during the onsite monitoring. NDEE Program Monitors and staff will follow-up during onsite visits to ensure that the corrective actions are implemented as directed.

Administrative/Fiscal Monitoring Schedule for PY2022-2026 BIL Program:

- **Blue Valley Community Action**
April 2023, 2024, 2025, 2026, 2027
- **Central Nebraska Community Action Partnership**
October 2022, 2023, 2024, 2025, 2026
- **Northeast Nebraska Community Action Partner**
November 2022, 2023, 2024, 2025, 2026
- **Community Action Partnership of Lancaster and Saunders Counties**
February 2023,2024, 2025, 2026, 2027
- **Community Action Partnership of Mid Nebraska**
June 2023, 2024, 2025, 2026, 2027
- **Northwest Community Action Partnership**
March 2023, 2024, 2025, 2026, 2027
- **Southeast Nebraska Community Action Partnership**
May 2023, 2024, 2025, 2026, 2027
- **Habitat for Humanity of Omaha**
May 2023, 2024, 2025, 2026, 2027

Resolution Strategy

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

HEALTH & SAFETY SUPPORT ACTIVITIES

Quarterly Technical Working Group

Meetings attended by technical staff personnel from each Subgrantee with NDEE technical staff provide training opportunities to discuss technical issues, specific problems, innovative solutions, and program direction. Technical Working Group meetings will continue to meet on a quarterly basis in PY2022 and will communicate regularly on an as needed basis through email or by conference call.

Lead Safe Weatherization Training

Lead safe weatherization training, as needed, will be offered through the Nebraska WAP Training Network during the PY 2022-2026 BIL Program Year. NDEE will continue to ensure that WAP Network staff and crews receive training and ongoing technical assistance regarding Lead-Safe Weatherization work practices through the WAP Training Network and through monthly site visits to observe Lead Safe Weatherization practices of crews and contractors.

Lead Safe Weatherization Site Visits

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

MONITORING

WHAT PERCENTAGE OF T&TA FUNDING IS ALLOCATED TO MONITORING? (IF DEFINED IN SECTION B OF THE BUDGET DETAILS WITHIN THE ANNUAL APPLICATION, INCLUDE THAT WITHIN YOUR DESCRIPTION BELOW.)

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

NDEE administrative/fiscal personnel:

- Grant Section Supervisor: 80% administrative/20% T & TA
- Federal Administrator II: 30% administrative/70% T & TA

NDEE Technical Monitoring Personnel:

- Building Program Specialist: 100% T & TA
- Two (2) Environmental Specialist II: 100% T & TA
- One (1) Environmental Specialist III

The NDEE Monitoring Strategy includes the following monitoring and program review activities for each Subgrantee:

Nebraska Department of Environment and Energy Program Monitoring and Compliance Strategy				
Monitoring/Review Activity	Purpose	Conducted by:	# of Units	Frequency

Onsite Inspection of in-progress units	Provide technical guidance or assistance to Subgrantees on in-progress projects. Includes lead safe monitoring, training, and/or technical assistance.	(3) WAP Technical Monitors/Certified Quality Control Inspectors	10% of all units for each Subgrantee	Monthly or every other month as needed to reach targeted percentage of units per Subgrantee.	
Onsite badge training and verification	Incorporate the Nebraska WAP badges training and verification program into the network and verify trainee certifications into the tracking tool.	(3) WAP Technical Monitors/Certified Quality Control Inspectors	N/A	Monthly or as needed based on Subgrantee field staff new hire dates	
Quality Control Inspection	Quality Control Program Inspections including final diagnostic testing, or on-site monitoring of completed units submitted for reimbursement to NDEE. Includes client file review and energy audit review.	(3) WAP Technical Monitors/Certified Quality Control Inspectors	Minimum of 1 per month per Technical Monitor – 2 per month. 10% of all units for each Subgrantee.	Monthly	
On-Site File Review Monitoring	Subgrantee agency office client files	(3) WAP Technical Monitors/Certified Quality Control Inspectors and Fiscal Compliance Analyst	File review for each completed project that receives an onsite inspection and during annual Program Compliance Fiscal Monitoring.	Monthly or every other month to ensure that file review is completed for every unit inspected by a WAP Technical Monitor. Annual during Program Compliance Fiscal Monitoring.	
Lead Safe Weatherization	Assure that lead-safe procedures are implemented as required.	WAP Technical Monitors	n/a	At least once per quarter/per sub-grantee and per crew/contractor.	
Program Compliance Administrative/ Fiscal Monitoring	Comprehensive review of Subgrantee program administration including a financial review and a systems monitoring.	Federal Administrator II	n/a	At least once annually for each Subgrantee.	
Desktop Energy Audit Review	Review energy audits submitted with reimbursement requests to ensure the appropriate audit tool is used, input values are appropriate, energy efficiency measures are	Building Program Specialist	10% of all completed units	Sampling from Reimbursement Requests	

	identified and implemented according to SIR's for appropriate measures.			
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OTHER, PLEASE SPECIFY
 DESCRIBE OTHER TECHNICAL ASSISTANCE ACTIVITIES HERE

6.0 CLIENT EDUCATION

DESCRIBE WHAT CURRENT AND PLANNED CLIENT EDUCATION MATERIALS AND/OR ACTIVITIES ARE INCLUDED IN THE T&TA BUDGET CATEGORY. ONLY THOSE PAID FOR WITH T&TA FUNDS NEED TO BE MENTIONED.

NOTE: THIS DOES NOT INCLUDE TRAINING WORKERS TO DELIVER CLIENT EDUCATION. THIS SHOULD BE DESCRIBED IN THE TRAINING SECTION, ABOVE.

CLIENT EDUCATION ACTIVITIES PRIOR TO, DURING AND AFTER WEATHERIZATION WHICH ADDRESS THE WEATHERIZATION PROCESS AND ENERGY SAVINGS DETAILS

The Nebraska WAP approach to client education has been designed to enhance program participants' understanding of home energy efficiency improvements, to increase energy savings, and to contribute to the ongoing effectiveness of installed weatherization measures. Educational materials prepared by NDEE and federal program initiatives are provided to our Subgrantees to provide important client education to each WAP client. Subgrantees will be required to provide (at a minimum) the following client educational materials in verbal and written format:

- Prior to Weatherization
 - Radon Informed Consent/Consent to Perform Work Form WX6
 - Home and Safety Home Screening Questionnaire Form WX7
 - Renovate Right (occupants of all buildings built pre-1978)
 - Lead Hazard Pre-Renovation Form WX3
 - Health and Safety Checklist Form WX8
- During Weatherization
 - Weatherization Deferral Notice Form WX4
 - A Brief Guide to Mold, Moisture and Your Home
 - Nebraska Mold Assessment and Release Form WX5
 - EPA's a Citizen's Guide to Radon
 - Combustion Equipment Safety Fact Sheet
- Following Weatherization
 - Nebraska Weatherization Program — Even More Dollar and Energy Savings Brochure
 - ASHRAE 62.2 Fact Sheet
 - Consumer Product Safety Asbestos Fact Sheet

NDEE developed Weatherization Forms and Factsheets are available for download to all Subgrantees and program clients on the NDEE website at <https://neo.ne.gov/programs/wx/wx-resources.html>

Additionally, the NeWAP will utilize PY 2022-2026 BIL funding to contract for the development of electronic based client outreach/marketing and education videos, documents and resources for use before, during and after weatherization services are performed. These resources will help to educate clients about energy efficiency that will help them to continue to save valuable energy resources into the future, well beyond the impact being created by the weatherization work.

CLIENT EDUCATION ACTIVITIES REGARDING H&S ISSUES AS INDICATED IN WPN 17-7

- AIR CONDITIONING AND HEATING SYSTEMS
- ASBESTOS
- BIOLOGICALS AND UNSANITARY CONDITIONS
- BUILDING STRUCTURE AND ROOFING
- CODE COMPLIANCE
- COMBUSTION GASES
- ELECTRICAL
- FORMALDEHYDE, VOLATILE ORGANIC COMPOUNDS (VOCs), FLAMMABLE LIQUIDS, AND OTHER AIR POLLUTANTS
- FUEL LEAKS
- GAS RANGE/OVENS
- HAZARDOUS MATERIALS DISPOSAL
- INJURY PREVENTION OF OCCUPANTS AND WEATHERIZATION WORKERS
- LEAD BASED PAINT
- EPA'S LEAD RENOVATION, REPAIR & PAINTING PROGRAM (RRP)MOLD/MOISTURE
- PESTS
- RADON
- SAFETY DEVICES
- VENTILATION AND INDOOR AIR QUALITY
 - AMERICAN SOCIETY OF HEATING REFRIGERATION AND AIR-CONDITIONING ENGINEERS (ASHRAE)
- WINDOW REPAIR, DOOR REPAIR
- WORKER SAFETY
 - OSHA
- ADDITIONAL TOPICS AS DESCRIBED IN HEALTH & SAFETY PLAN

Nebraska WAP Subgrantees provide on-site, electronic and hardcopy educational resources to clients including, but not limited to, the following topics:

Air Conditioning and Heating Systems

- Discuss appropriate use and maintenance of units.
- Provide all paperwork and manuals for any installed equipment.
- Where combustion equipment is present, provide a copy of the Combustion Equipment Safety FACTSheet describing how to avoid backdrafting.
- When bulk fuel tanks are not removed as part of the weatherization work, discuss and provide information on proper disposal.
- When deferral is necessary information is provided to the client, in writing, describing conditions that must be met in order for weatherization to commence with a copy of this notification placed in the client file.

Asbestos

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

Biologicals and Unsanitary Conditions

- Inform client in writing of observed conditions.
- Provide information on how to maintain a sanitary home.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

Building Structure and Roofing

- Notify client in writing of structurally compromised areas.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

Code Compliance

- Inform client in writing of observed code compliance issues when it results in a deferral.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

Combustion Gases

- Provide the client with a copy of the Combustion Equipment Safety FACTSheet with combustion safety and hazards information.

Electrical

- When electrical issues are the cause of a deferral, provide information to client on over-current protection, overloading circuits, and basic electrical safety/risks.

Formaldehyde, Volatile Organic Compounds (VOCs), Flammable Liquids, and other Air Pollutants

- Inform client in writing of observed hazardous condition and associated risks.
- Provide client written materials on safety and proper disposal of household pollutants.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

Fuel Leaks

- Inform client in writing if fuel leaks are detected.

Gas Range/Ovens

- Inform client of the importance of using exhaust ventilation when cooking and the importance of keeping burners clean to limit the production of CO.
- Provide the client with a copy of the Combustion Equipment Safety FACTSheet.
- Provide client with verbal and written information on the use of the CO detector.

Hazardous Materials Disposal

- Inform client in writing of hazards associated with hazardous waste materials being generated/handled in the home.

Injury Prevention of Occupants and Weatherization Workers & Worker Safety (OSHA)

- Inform client in writing of observed condition/hazard and its associated risks.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

Lead Based Paint and EPA's Lead Renovation, Repair & Painting Program (RRP)Mold/Moisture

- Follow pre-renovation education provisions for RRP.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.
- Provide a copy of the Weatherization Deferral Notice completed by the Weatherization Representative and signed by the client or building owner.

Pests

- Inform client in writing of observed condition and associated risks.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

Radon

- Provide all clients EPA's *A Citizen's Guide to Radon* and inform them of radon related risks.
- Review with all clients the radon informed consent/consent to perform work form. The form must be signed with a copy of the included in the client file prior to receiving weatherization services.

Safety Devices

- Provide the client with verbal and written information on the use of smoke detectors and CO detectors.

- Provide the client with a copy of the Combustion Equipment Safety FACTSheet. Ventilation and Indoor Air Quality and the American Society of Heating Refrigeration and Air-Conditioning Engineers (ASHRAE)
 - Provide client with information on function, use, and maintenance (including location of service switch and cleaning instructions) of ventilation system and components.
 - Provide client with equipment manuals for installed equipment.
 - Include disclaimer that ASHRAE 62.2 does not account for high polluting sources or guarantee indoor air quality.
 - Provide the client with a copy of the ASHRAE 62.2 FACTSheet.
- Window Repair, Door Repair
- Provide information on lead risks wherever issues are identified.

DRAFT

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

State of Nebraska Weatherization Assistance Program

1.0 – GENERAL INFORMATION

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

The average per dwelling expenditure of financial assistance provided under WAP for labor, weatherization materials, and related matters may not exceed \$8,009 statewide in BIL WAP Program. As per the U.S. Department of Energy’s Weatherization Program Notice BIL 22-1. Historically, Nebraska has not limited H&S investment to a per-unit cost, but it has allocated between 15-20 percent of its annual allocations to cover H&S related expenditures. A per dwelling unit limit for Health and Safety expenditures of \$1,700 has been established, based on historical data. Units may exceed the \$1,700 limit if approved in advance by the Nebraska Department of Environment and Energy (NDEE) on a case-by-case basis.

1. Please see the USDOE approved Nebraska Weatherization Field Guide and Installation Standards, Chapter 2 for Nebraska’s WAP Health and Safety requirements for Single Family, Small Multi-Family and Manufactured Homes. *(Links to be posted on the Nebraska Department of Environment and Energy website <http://dee.ne.gov/Publications/Pages/22-045>)*

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.

Describe H&S Expenditure Limits and Justification Here

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.



Measure Matrix
Final.xlsx

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.

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

- 6.3 – Biologicals and Unsanitary Conditions - \$300.00
(odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.)
- 6.4 – Building Structure and Roofing - \$300.00
- 6.6 – Electrical - \$300.00
- 6.10 – Injury Prevention of Occupants and Weatherization Workers \$200.00
(Measures such as repairing stairs and replacing handrails)
- 6.12 – Mold and Moisture \$300.00
(Including but not limited to: drainage, gutters, down spouts, extensions, flashing, sump pumps, dehumidifiers, landscape, vapor retarders, moisture barriers, etc.)

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

- Prior to any on-site inspection work being scheduled in a home, sub-grantee intake personnel will assist clients in completing a Weatherization Client Questionnaire and a Health & Safety Home Screening Questionnaire as part of the application process.
 - The questionnaires provide information on health concerns and/or issues such as non-working furnaces, foundation issues, leaks, debris, pet/pest issues, broken glazing, etc. in the home that impact not only the client's safety but the safety of weatherization workers.
 - The questionnaires will be included in the client file for future reference.

Procedure for determining whether occupants suffer from health conditions which may be negatively impacted by the act of weatherizing their dwelling

- If it is determined through the Health & Safety Home Screening Questionnaire that someone in the home is sensitive to a product that may be or is intended to be used during the weatherization process, the sensitivity must be documented in the file and, if possible, an alternative product may be used. If no successful alternative is found, the weatherization of the home may proceed without completion of the measure with no impact on weatherization measures with lower SIRs, with prior Nebraska Department of Environment and Energy approval.

Procedure for addressing potential health concerns including pre-existing health conditions when they are identified

- When a client’s health is fragile and/or the weatherization activities would constitute a health or safety hazard, the occupants at risk will be required to leave the home during the activities and requested to return at least 1 hour (or a reasonable time as determined by the installers) after installers are scheduled to leave to allow for clean-up and appropriate ventilation of the home.
- Weatherization funds cannot be used to relocate clients or reimburse them for such costs incurred as a result of the requirement to leave during the day. If the client is unable to leave the home and the intended work may exacerbate an occupant’s health condition, the home may need to be deferred.
- Sub-grantees must take all reasonable precautions against performing work on homes that would subject clients to Health & Safety risks.

Location where forms have been uploaded/submitted

Separate attachment to SF424

Separate attachment to H&S Plan

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

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

Air Conditioning

- Repair of air conditioning systems is an allowable Health & Safety Cost. Replacement or installation of air conditioning system is not an allowable Health & Safety Cost.
 - A maximum \$500 may be spent to repair heat pumps and central air conditioning systems.
 - In renter occupied homes, if the cost to repair the central air conditioner or heat pump exceeds \$500, the owner may repair or replace the unit. However, if the central air conditioner or heat pump is replaced in accordance with the requirements of this Field Guide and Installation Standards, the Nebraska Weatherization Assistance Program (NeWAP) may contribute a maximum of \$1,500 to the replacement cost.
- Using proper protocols (Manual J, NEAT/MHEA outputs, etc.) based on post-weatherization housing characteristics, including installing mechanical ventilation, when installing or replacing a heating or cooling appliance.

Heating Systems

- "Red tagged", inoperable or non-existent primary heating system replacement, repair, or installation is an allowable H&S Cost.
- Using proper protocols (Manual J, NEAT/MHEA outputs, etc.) based on post-weatherization housing characteristics, including installing mechanical ventilation, when installing or replacing a heating or cooling appliance.
- Unsafe primary units must be repaired, replaced and removed, or rendered inoperable, or deferral is required.
- Replacement or installation of secondary units is not allowed.
- Secondary unvented units that conform to the safety standards on ANSI Z21.11.2 may remain as back-up heat sources.
- Units that do not meet ANSI Z21.11.2 must be removed, and properly disposed of, prior to weatherization but may remain until a replacement heating system is in place.
- Secondary unvented units that conform to the safety standards on ANSI Z21.11.2, but are not operating safely, must be removed and properly disposed of.
- Repair of secondary unvented units is not allowed.
- A gas-liquid-fueled space heater that remains in a completed single-family house after weatherization shall:
 - Not have an input rating in excess of 40,000 Btu/hour;
 - Not be located in, or obtain combustion air from sleeping rooms, bathrooms, toilet rooms, or storage closets, except:
 - One listed wall-mounted space heater in a bathroom if permitted by the authority having jurisdiction which:
 - has an input rating that does not exceed 6,000 Btu/hour;
 - Is equipped with an oxygen-depletion sensing safety shut-off system; and
 - The bathroom has adequate combustion air;
 - One listed wall-mounted space heater in a bedroom if permitted by the authority having jurisdiction which:
 - has an input rating that does not exceed 10,000 Btu/hour;
 - Is equipped with an oxygen-depletion sensing safety shut-off system; and
 - the bathroom has adequate combustion air.

Combustion Appliances

- Combustion safety testing is required when combustion appliances are present.
- A backdraft test must be performed at the time of Initial Inspection, the Quality Control and at the end of each workday (utilizing Daily Safety Test Out (DSTO)Form WX10) in which envelope or duct sealing measures have been performed, if the project will require more than one day, on all vented naturally drafting combustion appliances.

Solid-Fuel Burning Appliances

- A backdraft test must not be performed on solid fuel burning appliances.

Allowable Actions

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

- Repair of air conditioning systems, which do not qualify as an ECM, is an allowable H&S cost as follows:
 - A maximum of \$500 may be spent to repair heat pumps and central air conditioners in owner occupied unit.
 - In renter occupied homes, if the cost to repair the central air conditioner or heat pump exceeds \$500, the owner may repair or replace the unit. However, if the central air conditioner or heat pump is replaced in accordance with the requirements of the Field Guide and Installation Standards the NeWAP may contribute a maximum of \$1,500 toward the replacement cost.

Prohibited Actions

Concur with DOE Guidance

- Using DOE WAP H&S funds for replacement or installation of secondary heat sources is prohibited.

Required Testing/Inspection

Concur with DOE Guidance

Alternative Guidance

DRAFT

Air Conditioning

- N/A

Heating Systems

- Verify that systems are present, operable, and performing correctly.
- Run DOE-approved audit to determine if the system can be installed as an energy conservation measure (ECM) prior to replacement as a Health & Safety measure.
- For combustion equipment; inspect chimney and flue and test for Combustion Appliance Zone (CAZ) depressurization.

Combustion Appliances

- NeWAP subgrantees must complete CAZ testing on all areas within a home that contain one or more atmospherically vented combustion appliances.
- CAZ testing must be completed on all weatherized homes, at the time of the initial and quality control inspections, with all testing results documented in the client file using the CAZ Depressurization Test (Form WX9).
- 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.
- Inspect venting of combustion appliances and confirm adequate clearances.
- Combustion safety testing is required when combustion appliances are present.
- Test naturally drafting appliances for draft and spillage under worst case conditions before and after air tightening.
- NeWAP subgrantees must verify and document in each client file that each Combustion Appliance Zone in a weatherized home has adequate combustion air supply.

Solid-Fuel Burning Appliances

- 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 that it adheres to the applicable code or local authority having jurisdiction. Appliances must be inspected pre- and post-weatherization.
- The inspection shall include, but not be limited to:
 - System clearances to combustibles, inside and outside of the home.
 - The type and condition of the flooring material where the unit is installed.
 - Visual signs of wear or missing or malfunctioning components.
 - Evidence of ash deposit build-out.
 - Evidence of creosote build-up.
 - Signs of structural failure.
 - Evidence of blockage, restriction, leakage, corrosion and/or flame roll-out.
 - Visual evidence of soot on the walls, mantel or ceiling or hearth.

Gas Fireplaces

Non-sealed combustion type and venting into a conventional chimney with or without a pre-constructed liner.

- A spillage test is required and is to be performed when the CAZ is under worst case depressurization.
 - Complete using moving a smoke stick directly in front of the fireplace in a traverse-like pattern.
 - Any spillage after one minute is a failure.
 - If spillage occurs under worst case depressurization, spillage testing would then be performed under natural conditions.
- CO is to be tested in ambient air directly in front of and above the fireplace if the inspector is unable to place the test probe in the exhaust vent or exterior termination point.

Sealed combustion insert.

- A spillage test is not required, but it is recommended to use a smoke stick directly in front of the fireplace while operating. Any sign of spillage may indicate an issue and should be appropriately documented.
- CO is to be tested in ambient air directly in front of and above the unit if the inspector is unable to place the test probe in the exhaust vent or exterior termination point.

Gas Stoves

- If the gas stove is specified for use as a heating appliance:
 - A spillage test is required and is to be performed when the CAZ is under worst case depressurization.

- Any spillage after one minute is a failure.
- If spillage occurs under worst case depressurization, spillage testing would then be performed under natural conditions.
- If the vent pipe is accessible, carbon monoxide testing is required.
- If the vent pipe is accessible, draft testing is required.

Wood Fireplaces and Pellet Stoves

- Non-sealed combustion type and venting into a conventional chimney.
- A backdraft test must not be performed on wood fireplaces and pellet stoves.
- A spillage test must not be performed on wood fireplaces and pellet stoves.
- CO tests must not be performed on wood fireplaces and pellet stoves.

Cooking Stoves/Ovens

- Inspect cooking burners for operability and flame quality.

Grantee Combustion Testing Action Levels

Cooling Systems

- N/A

Heating Systems and Combustion Appliances

- The NeWAP requires Energy Auditors and Quality Control Inspectors to complete combustion, spillage and efficiency testing and compare those results to the BPI 1200 (2017) Standard and to follow all Action Levels associated with the Standard.

Solid Fuel Burning Appliances - **homes containing wood, gas or pellet fireplaces and/or stoves**

- must be evaluated for the weatherization impact of their operation on other combustion appliances. A blower door must be set to run at 300 CFM (set up as for depressurization testing) to mimic the worst-case airflow dynamics likely when a fireplace or stove is in use.
- If spillage occurs in the other combustion appliances under the worst-case depressurization test, spillage testing would then be performed under natural conditions and Carbon Monoxide Detectors will be installed, as per manufacturer's instructions, located adjacent to the fireplace and the back-drafting appliance.

Grantee Woodstove & Fireplace inspection/testing policy including actions/limits

Concur with DOE Guidance

Alternative Guidance

- Manufactured homes that have non-manufactured home or incorrectly installed solid fuel combustion heating systems must be deferred.
- Fireplaces must be inspected pre- and post-weatherization.
- The inspection shall include, but not be limited to:
 - System clearances to combustibles, inside and outside of the home.
 - The type and condition of the flooring material where the unit is installed.
 - Visual signs of wear or missing or malfunctioning components.
 - Evidence of ash deposit build-out.
 - Evidence of creosote build-up.
 - Signs of structural failure.
 - Evidence of blockage, restriction, leakage, corrosion and/or flame roll-out.
 - Visual evidence of soot on the walls, mantel or ceiling or hearth.
- Assessing solid fuel fired appliances involves inspecting the venting/chimney and the overall installation to ensure it adheres to applicable state and local codes.
- State code requires that the flue areas and chimney requirements of masonry fireplaces meet the following requirements:
 - Flue area requirements of masonry fireplaces (excluding sealed combustion/direct vented units) must meet the following requirement:
 - Round chimney flues shall have a minimum cross-sectional area of at least 1/12 of the fireplace opening.
 - Square chimney flues shall have a minimum cross-sectional area of at least 1/10 of the fireplace opening.
 - Rectangular chimney flues with an aspect ratio less than 2 to 1 shall have a minimum cross-sectional area of at least 1/10 of the fireplace opening.
 - Rectangular chimney flues with an aspect ratio of 2 to 1 or more shall have a minimum cross-sectional area of at least 1/8 of the fireplace opening.
 - State code requires chimney terminations extend at least 2 feet higher than any portion of a building within 10 feet but shall not be less than 3 feet above the highest point where the chimney passes through the roof.
 - Appropriate chimney caps and/or rain caps must be in place.
- Homes with fireplaces and solid fuel fired appliances that do not meet state and local code requirements regarding flue area and chimney terminations must not be weatherized.
- Homes with fireplaces and solid fuel fired appliances that are indicated in the pre-inspection of having any deficiency that could cause an unsafe condition must not be weatherized.
- Weatherized homes containing wood, gas or pellet fireplaces and/or stoves must be evaluated for the impact of their operation on other combustion appliances. A blower door must be set to run at 300 CFM (set up as for depressurization testing) to mimic the worst-case airflow dynamics likely when a fireplace or stove is in use.
- If spillage occurs in the other combustion appliances under the worst-case depressurization test, spillage testing would then be performed under natural conditions and Carbon Monoxide Detectors will be installed, as per manufacturer's instructions, located adjacent to the fireplace and the back-drafting appliance.

Required Occupant Education

Concur with DOE Guidance

Alternative Guidance

- When deferral is necessary, provide information to the client, in writing, describing conditions that must be met in order for weatherization to commence. A copy of this notification must also be placed in the client file.
- Discuss appropriate use and maintenance of units.
- Provide all paperwork and manuals for any installed equipment.
- Where combustion equipment is present, provide a copy of the Combustion Equipment Safety FACTSheet describing how to avoid backdrafting.
- When bulk fuel tanks are not removed as part of the weatherization work, discuss and provide information on proper disposal.
- Where combustion equipment is present, provide safety information regarding how to recognize depressurization.

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

Required Actions		
Concur with DOE Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
DOE WAP H&S Funds <input type="checkbox"/>	Alternative Funds <input type="checkbox"/>	
<p>As per the NeWAP Policies and Procedures Manual:</p> <ul style="list-style-type: none"> The presence of asbestos or suspected asbestos containing material (ACM) in a weatherization home requires Subgrantees to take reasonable and necessary precautions to prevent asbestos contamination in the home. In homes where friable suspected ACM, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present the sub-grantee must take precautionary measures as if it contains asbestos, utilize personal air monitoring, and follow the following requirements based on the location/type of suspected ACM material. 		
Grantee ACM policy		
<p>In siding, walls, ceilings, etc.</p> <ul style="list-style-type: none"> In homes where friable suspected ACM, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present the sub-grantee must take precautionary measures as if it contains asbestos, such as utilizing personal air monitoring. In homes with asbestos siding, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present and in good condition weatherization work may continue. <p>In vermiculite</p> <ul style="list-style-type: none"> If the presence of asbestos has been previously confirmed or if the sub-grantee believes that vermiculite insulation is present, when blower door tests are performed, it must be performed using pressurization instead of depressurization. <p>On pipes, furnaces, or other small, covered surfaces</p> <ul style="list-style-type: none"> An appropriately trained crew leader, auditor or inspector shall complete an initial visual inspection of all surfaces and subsurfaces, piping, and equipment for a suspected ACM. Assume asbestos is present in suspect covering materials. In homes where friable suspected ACM is present the sub-grantee must take precautionary measures as if it contains asbestos, such as utilizing personal air monitoring and blower door testing must not be completed. In homes with asbestos present, encapsulated and in good condition weatherization work may continue. 		
Grantee Blower Door Testing Policy When Suspected ACM Exists		
<p>In siding, walls, ceilings, etc.</p> <ul style="list-style-type: none"> In homes where friable suspected ACM siding, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present, blower door testing, using positive pressure techniques, must be completed. In homes with asbestos siding, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present and in good condition, blower door testing, using either negative or positive pressure techniques, must be completed. <p>In vermiculite</p> <ul style="list-style-type: none"> If the presence of asbestos has been previously confirmed or if the sub-grantee believes that vermiculite insulation is present, when blower door tests are performed, it must be performed using pressurization instead of depressurization. <p>On pipes, furnaces, or other small, covered surfaces</p> <ul style="list-style-type: none"> In homes where friable suspected ACM, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present blower door testing must not be completed. In homes with asbestos, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present, encapsulated and in good condition blower door testing, using either negative or positive pressure techniques, must be completed 		
Allowable Actions		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	

In siding, walls, ceilings, etc.

- In homes with asbestos siding is present and in good condition installing dense-pack insulation from the exterior is allowed.
- In homes with asbestos siding is present and in bad condition wall insulation measure work must be completed from the interior of the home.
- Removal of siding is allowed to perform energy conservation measures; however, precautions must be taken not to damage the siding. Asbestos siding should never be cut, sanded or drilled. Where possible, insulate the exterior walls through the interior of the home.

In vermiculite

- The costs associated with vermiculite/asbestos *testing* is an eligible Health & Safety expenditure, to specified expenditure limits and when AHERA sample testing is conducted by a certified tester.

Prohibited ActionsConcur with DOE Guidance **In siding, walls, ceilings, etc.**

- The costs associated with testing, abatement or replacement with new siding are not eligible expenditures in the NeWAP.

In vermiculite

- The costs associated with vermiculite abatement or encapsulation are not eligible expenditures in the NeWAP.

On pipes, furnaces, or other small, covered surfaces

- In homes where friable suspected ACM, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present the costs associated with asbestos testing, abatement or encapsulation not eligible expenditures in the Nebraska Weatherization Assistance Program.

Required Testing/InspectionConcur with DOE Guidance Alternative Guidance Results in Deferral/Referral DOE WAP H&S Funds Alternative Funds

- Visual inspections of all surfaces and subsurfaces, piping and equipment for suspected ACM.

Allowable Testing/InspectionAllowed with DOE WAP H&S Funds Allowed with Alternative Funds

- AHERA sample testing may be conducted by a certified tester and the cost of sample testing and asbestos training requirements may be charged to the Health & Safety budget category.
 - Subgrantees are limited to a maximum cost of \$150 for vermiculite testing.

Required Occupant EducationConcur with DOE Guidance Alternative Guidance

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

6.3 – Biologicals and Unsanitary Conditions**Required Actions**Concur with DOE Guidance Alternative Guidance Results in Deferral/Referral DOE WAP H&S Funds Alternative Funds

- Deferral may be necessary where conditions (odors, bacteria, raw sewage, rotting wood, etc.) in the home pose a health risk to occupants and/or weatherization workers. Or maybe worsened and not resolved by weatherization activities.

Allowed Actions		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
<ul style="list-style-type: none"> Remediation of minor conditions that may lead to or promote biological concerns and unsanitary conditions is allowed. Subgrantees are limited to a maximum cost of \$300 to remediate these minor conditions, although approval to exceed this limitation will be reviewed on a case-by-case basis by the Nebraska Department of Environment and Energy prior to any work being implemented. 		
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 type="checkbox"/>	
<ul style="list-style-type: none"> Sensory and visual inspection of interior, exterior, attics and basements. 		
Prohibited Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
<ul style="list-style-type: none"> Testing or addressing bacteria, viruses or major biological and/or unsanitary conditions is not an allowable reimbursable cost. 		
Required Occupant Education		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	
<ul style="list-style-type: none"> Inform client in writing of observed conditions. Provide information on how to maintain a sanitary home. When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence. 		

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

Allowable Actions		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
<ul style="list-style-type: none"> Subgrantees are limited to a maximum cost of \$300 to implement minor repairs when necessary to effectively weatherize the home. Approval to exceed this limitation will be reviewed on a case-by-case basis by the Nebraska Department of Environment and Energy prior to any work being implement. 		
Prohibited Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
<ul style="list-style-type: none"> Building rehabilitation is beyond the scope of the <i>Nebraska Weatherization Assistance Program</i>. 		
Define “major” repairs		
<ul style="list-style-type: none"> Building rehabilitation work that exceeds a maximum cost of \$300 or that is not reviewed and approved by the Nebraska Department of Environment and Energy is beyond the scope of the Nebraska Weatherization Assistance Program. 		
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 type="checkbox"/>	Alternative Funds <input type="checkbox"/>	
<ul style="list-style-type: none"> Visual inspection of building structure and roofing for damages that compromise building durability and to verify that the 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 type="checkbox"/>	
<ul style="list-style-type: none"> Structural testing is not an allowable reimbursable cost. 		
Prohibited Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
<ul style="list-style-type: none"> 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"/>
<ul style="list-style-type: none"> • Inform client in writing of observed conditions. • When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence. 	

6.5 – Code Compliance

Allowable Actions

Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
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- Correction of preexisting code compliance issues is not an allowable unless triggered by weatherization measures being installed in a specific room or area of the home.
 - Examples of eligible costs associated with cost-effective Weatherization Measures include, but are not limited to: the installation of fans to provide appropriate ventilation in the home, appropriate disconnect switching and clearance requirements on furnace installations, installation of appropriately sized chimney liner when water heaters are orphaned by a high efficiency furnace installation, etc. Costs associated with the purchase of any required permits are eligible
- It is each sub-grantee’s responsibility to ensure that weatherization-related work conforms with the applicable codes in the jurisdiction where the work is being performed.
- Follow State and local codes while installing weatherization measures, including H&S measures.
- The cost of the permits must not be passed onto the client.
- When correction of preexisting code compliance issues is triggered and paid for with WAP funds, specific code requirements with reference to the weatherization measure(s) that triggered the code compliance issue **must** be included

Prohibited Actions

Concur with DOE Guidance <input checked="" type="checkbox"/>
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- Condemned properties and properties that have been deemed “unsafe” by local code authorities where H&S conditions exist that cannot be corrected under this guidance must be deferred.

Required Testing/Inspection

Concur with DOE Guidance <input type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
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DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input type="checkbox"/>
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- Visual inspection of building to verify that the conditions of the home 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 type="checkbox"/>
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- Using DOE WAP H&S funds for any code compliance analysis/evaluation by a third-party is prohibited.

Required Occupant Education

Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
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- Inform client in writing of observed conditions.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

6.6 – Electrical

Required Actions

Concur with DOE Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
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DOE WAP H&S Funds <input type="checkbox"/>	Alternative Funds <input type="checkbox"/>
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The two primary energy-related H&S electrical concerns associated with weatherization work are insulating homes that contain knob-and-tube wiring and overloaded electrical. Electrical safety is a basic need that impacts home weatherization and repair.

Knob-and-Tube Wiring

- Determine the location of live knob-and-tube wire locations and document their location in the client file.
- In attics where Knob-and-Tube Wiring has been previously covered with insulation determine where the wiring is located and verify that it is actually still "active". This determination may be completed by a licensed electrician, the use of a thermal imager/scanner, visually or physically locating the wires or another verifiable option approved by the NDEE.

Overloaded Electrical

- Wiring splices must be enclosed in metal or plastic electrical boxes, fitted with cover plates.
- Electrical boxes in attics must be marked with a flag that is visible above the insulation.

Allowable Actions

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

Knob-and-Tube Wiring

- Providing sufficient over-current protection and damming prior to insulating building components containing knob and tube wiring, as required by the AHJ.
- Subgrantees are limited to a maximum cost of \$300 to implement these minor repairs, although approval to exceed this limitation will be reviewed on a case-by-case basis by the NDEE prior to any work being implemented.

Prohibited Actions

Concur with DOE Guidance

Knob-and-Tube Wiring

- N/A

Overloaded Electrical

- If no insulation is being installed in a home the existing fuses must remain intact. In homes that utilize fuses where attic insulation is being installed the State Electrical Board recommends the use of a licensed electrician for the installation of safety Type-S-Fuses as indicated in the National Electrical Code.

Define "major" repairs

- Major electrical repairs are defined as costing over \$300.

Required Testing/Inspection

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

- A visual inspection of all home's areas for the presence and condition of knob-and-tube wiring.
- Evaluating the existing knob-and-tube wiring for safety issues prior to beginning weatherization work.
- Check for building and/or system alterations that may create an electrical hazard.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

- Verification that existing knob-and-tube wiring is active.

Required Occupant Education

Concur with DOE Guidance

Alternative Guidance

- When electrical issues are the cause of a deferral, provide information to client on over-current protection, overloading circuits, and basic electrical safety/risks.
- Serious electrical hazards exist when gross overloads such as over usage, overloaded outlets and/or oversized fuses are present. Should auditors and crews find such existing problems, they should notify the owner and note the problem in the client file.

6.7 – Fuel Leaks

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"/>	
<ul style="list-style-type: none"> When a minor gas leak is found on the property, but before (or in front) of the meter, the utility service must be contacted before work can proceed 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 checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
<ul style="list-style-type: none"> Fuel leaks found on the property, but after (or behind) the meter must be repaired before weatherizing a unit. 		
Prohibited Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
<ul style="list-style-type: none"> Notify utility and temporarily halt work when leaks are discovered that are the responsibility of the utility to address. Using DOE WAP H&S funds to repair leaks that are the responsibility of the utility 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 type="checkbox"/>
DOE WAP H&S Funds <input checked="" type="checkbox"/>	Alternative Funds <input type="checkbox"/>	
<ul style="list-style-type: none"> Test all exposed gas lines, fittings, valves, couplings, and connections for fuel leaks from the utility connection to the appliances throughout the home. Test all gas appliances for fuel leaks at all connections, valves, fittings, and burners. Conduct sensory inspection of all bulk fuel lines and storage tanks to determine if leaks exist. 		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
<ul style="list-style-type: none"> Test exposed gas lines from utility coupling into and throughout the home. Conduct sensory inspection on bulk fuels to determine if leak exists. 		
Prohibited Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
<ul style="list-style-type: none"> 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"/>	
<ul style="list-style-type: none"> 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 type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
<ul style="list-style-type: none"> There are no Allowable Actions in the NeWAP for using DOE WAP H&S Funds associated with Gas Ovens/Stovetops/Ranges. 		
Prohibited Actions		
Concur with DOE Guidance <input type="checkbox"/>		
<ul style="list-style-type: none"> Maintenance on or repair gas cooktops and stoves is not allowed. Replacement is not allowed. 		
Required Testing/Inspection		
Concur with DOE Guidance <input 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 type="checkbox"/>	

<ul style="list-style-type: none"> • Test gas ovens for CO. • Visually inspect cooking burners and ovens for operability and flame quality. 	
Define action levels for oven CO testing and resulting actions	
<ul style="list-style-type: none"> • Combustion results must comply with the BPI 1200 (2017) Standard Threshold Limit for ovens of less than 225 ppm as measured. 	
Allowable Testing/Inspection	
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
<ul style="list-style-type: none"> • Test gas ovens for CO. • Visually inspect cooking burners and ovens for operability and flame quality. 	
Required Occupant Education	
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
<ul style="list-style-type: none"> • Inform clients of the importance of using exhaust ventilation when cooking and 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 type="checkbox"/>
DOE WAP H&S Funds <input type="checkbox"/>	Alternative Funds <input type="checkbox"/>	
<ul style="list-style-type: none"> • Hazardous Waste Materials generated in the course of weatherization work (3.g., refrigerant, asbestos, lead, mercury, CFL lighting/ ballasts, etc.) shall be disposed of according to local laws, regulations and/or Federal guidelines, as applicable. • Subgrantees must document proper disposal requirements in contract language with responsible party. • Limited removal of pollutants is allowed and required if they pose a risk to workers. • If pollutants pose a risk to workers and removal cannot be performed or is not allowed by the client, the unit must be deferred. 		
Define “limited” removal of pollutants		
<ul style="list-style-type: none"> • Removal costs that do not exceed \$200 can be considered as “limited” repair cost. 		
Allowable Actions		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
<ul style="list-style-type: none"> • The NeWAP does not use DOE WAP H&S funds for any “allowable actions” associated with Hazardous Materials. 		
Prohibited Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
<ul style="list-style-type: none"> • Lead, Asbestos, and Radon abatement is a prohibited activity in the NeWAP 		
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 type="checkbox"/>	Alternative Funds <input type="checkbox"/>	
<ul style="list-style-type: none"> • Sensory and visual inspection. 		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
<ul style="list-style-type: none"> • The NeWAP does not use DOE WAP H&S funds for any “allowable testing” of Hazardous Materials. 		
Prohibited Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
<ul style="list-style-type: none"> • 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 client in writing of hazards associated with hazardous waste materials being generated/handled in the home.
- Inform occupant in writing of observed hazardous conditions.
- Provide client written materials on safety and proper disposal of household pollutants.

6.10 - Injury Prevention of Occupants

Allowable Actions

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

- When necessary to effectively weatherize the home, workers may make **minor** repairs and installations to allow for the implementation of weatherization measures.

Prohibited Actions

Concur with DOE Guidance

- Using DOE WAP H&S funds for major repairs, as defined by the Grantee's H&S Plan is prohibited

Define "major" repairs

- Subgrantees are limited to a maximum cost of \$200 to implement **minor** repairs, although approval to exceed this limitation will be reviewed on a case-by-case basis by the Nebraska Department of Environment and Energy **prior** to any work being implemented.
- Injury prevention repair costs that exceed \$200 can be considered a "major" repair cost.

Required Testing/Inspection

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

- Visual inspection and assessment of conditions that may require prevention.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

- The NeWAP does not use DOE WAP H&S funds for any "allowable testing" of Injury Prevention.

Required Occupant Education

Concur with DOE Guidance

Alternative Guidance

- Inform client and landlord (if applicable) in writing of observed condition and any potential hazards identified during the Energy Audit inspection or intake process including at a minimum:
 - the date of the Energy Audit or assessment,
 - the date of notification,
 - a clear description of the problem, and
 - when deferral is necessary, conditions that must be met in order for weatherization to commence.

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

Required Actions

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

- Crews and contractors must follow EPA's Lead; Renovation, Repair and Painting Program (RPP) when working in pre-1978 housing unless testing confirms the work area to be lead free.
- Deferral is required when the extent and condition of the lead-based paint in the house would potentially create further H&S hazards, the sub-grantee will inform the client of the of the issues associated with a deferral in the Weatherization Deferral Notice (Form WX4) completed by the Weatherization Representative and signed by the client or building owner.
- Only those costs directly associated with the testing and lead safe practices for surfaces directly disturbed during weatherization activities are allowable.

Allowable Actions

Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
<ul style="list-style-type: none"> Job site set up, implementation and cleaning verification as required under RRP with a Certified Renovator overseeing the work. 	
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 checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
<ul style="list-style-type: none"> Testing to determine the presence of lead in paint that will be disturbed by WAP measure installation is allowed with EPA-approved testing methods. Testing methods must be economically feasible and justified. 	
Required Occupant Education	
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
<ul style="list-style-type: none"> EPA Pre-Renovation education documentation regarding RRP. When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence and a copy of the Weatherization Deferral Notice completed by the Weatherization Representative and signed by the client or building owner. 	

6.12 – Mold and Moisture

Allowable Actions

Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
<ul style="list-style-type: none"> Surface preparation where weatherization measures are being installed (e.g., cleaning mold off window trim in order to apply caulk) must be charged as part of the ECM, not to the H&S budget category. All clothes dryers and exhaust fans must be vented to the exterior. The NeWAP requires a full ground laid moisture barrier must be installed whenever possible in accessible crawl spaces and under manufactured and modular homes except when one exists, or the space has a concrete floor. <ul style="list-style-type: none"> the moisture barrier must be a Class I vapor retarder, a minimum of 6 mils thick, extended up the walls and the support columns at least 12 inches and the joints must overlap a minimum of 12 inches. When installing insulated skirting without adequate clearance to install a full ground laid moisture barrier, the moisture barrier must extend a minimum of 24 inches beyond the insulation. Limited water damage repairs and Minor source control work that can be addresses by weatherization workers and are allowed, when necessary, in order to weatherize the home and to ensure the long-term stability and durability of the measures. Subgrantees are limited to a maximum cost of \$300 to implement limited repairs, although approval to exceed this limitation will be reviewed on a case-by-case basis by the Nebraska Department of Environment and Energy prior to any work being implemented. Subgrantees are limited to a maximum cost of \$300 to implement this minor source control (i.e., correction of moisture and mold creating conditions) independent of latent damage and related repairs. Approval to exceed this limitation will be reviewed on a case-by-case basis by the Nebraska Department of Environment and Energy prior to any work being implemented. 	
Prohibited Actions	
Concur with DOE Guidance <input checked="" type="checkbox"/>	

<ul style="list-style-type: none"> Mold cleanup is not an allowed Health & Safety cost. Using DOE WAP Health & Safety funds for window and door replacement due to mold and moisture issues 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 type="checkbox"/>	
<ul style="list-style-type: none"> Visual inspection and assessment for mold and moisture damage during on-site inspections and implementation work. 		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
<ul style="list-style-type: none"> The NeWAP does not use DOE WAP H&S funds for any “allowable testing” of Molds. 		
Prohibited Testing/Inspection		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
<ul style="list-style-type: none"> No mold testing of any type is allowed using DOE WAP Health & Safety Funds. 		
Required Occupant Education		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	
<ul style="list-style-type: none"> Client will be provided with a copy of the <i>A Brief Guide to Mold, Moisture and Your Home</i>. Review with and provide a completed copy to the client, of the Nebraska Mold Assessment and Release (Form WX5). 		

6.13 - Occupant Pre-existing or Potential Health Conditions

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"/>	
<ul style="list-style-type: none"> 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 <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
<ul style="list-style-type: none"> When a client’s health is fragile and/or the weatherization activities would constitute a health and safety hazard, the occupant at risk will be required to leave the home during the activities and be requested to return at least 1 hour (or a reasonable time as determined by the installers) after installers are scheduled to leave to allow for clean-up and appropriate ventilation of the home. 		
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 type="checkbox"/>	Alternative Funds <input type="checkbox"/>	
<ul style="list-style-type: none"> Screen occupants for known or suspected health concerns either as part of the initial application for weatherization, during the Energy Audit or both. Complete the screening utilizing NeWAP Form Wx7 <i>Home Health and Safety Screening Questionnaire</i> and keep completed Form in the client file 		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
<ul style="list-style-type: none"> The NeWAP does not use DOE WAP H&S funds for any “allowable testing” associated with Occupant Pre-Existing Conditions. 		
Required Occupant Education		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	
<ul style="list-style-type: none"> 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 type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
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DOE WAP H&S Funds <input type="checkbox"/>	Alternative Funds <input type="checkbox"/>
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- Pest removal issues that would exceed the maximum cost of \$300 to remedy must be deferred.

Allowable Actions

Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
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- Pest removal is allowed only where infestation would prevent weatherization. Subgrantees are limited to a maximum cost of \$300 for pest removal, although approval to exceed this limitation will be reviewed on a case-by-case basis by the Nebraska Department of Environment and Energy prior to any work being implemented.
- Screening of windows and points of access and incorporating pest exclusion into air sealing practices to prevent intrusion
- Infestation of pests may be cause for deferral where it cannot be reasonably removed or poses H&S concern for workers.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
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- The NeWAP does not use DOE WAP H&S funds for any “allowable testing” associated with Pests.

Required Occupant Education

Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
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- Inform client in writing of observed condition and associated risks.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

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"/>
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DOE WAP H&S Funds <input type="checkbox"/>	Alternative Funds <input type="checkbox"/>
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- The following radon precautions will be implemented in all weatherized homes to reduce the possibility of exacerbating any potential radon issues:
 - Whenever site conditions permit, cover exposed dirt floors within the pressure/thermal boundary with 6 mil (or greater) polyethylene sheeting, lapped at least 12” and sealed with appropriate sealants at all seams, walls and penetrations.
 - Air seal existing sumps in such a way that water can drain from above and below the sump cover.
 - Seal and caulk visible, accessible penetrations, openings or cracks in below-grade walls and floors that contact the ground with a sealant that meets the requirements of ASTM C920.
 - Other precautions may include, but are not limited to, sealing any observed floor and/or foundations penetrations isolating the basement from the conditioned space, and ensuring crawlspace venting is installed.
- The following additional radon precautions will be implemented in all weatherized homes equipped with active radon mitigation systems:
 - Verify that the radon vent fan is operating.
 - If a previously installed radon mitigation system is not operating correctly advise the client to consult the system installer of the state radon office.
- ASHRAE 62.2 – 2016 will be implemented.

Allowable Actions

Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
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<ul style="list-style-type: none"> Covering of exposed dirt floors within the pressure/thermal boundary, sealed with appropriate sealants at all seams, walls and penetrations. <ul style="list-style-type: none"> Installing air seal existing sumps. Sealing and caulking visible, accessible penetrations, openings or cracks in below-grade walls and floors that contact the ground. Sealing any observed floor and/or foundations penetrations isolating the basement from the conditioned space. Ensuring crawlspace venting is installed. 	
Prohibited Actions	
Concur with DOE Guidance <input checked="" type="checkbox"/>	
<ul style="list-style-type: none"> Radon mitigation is not an allowable Health & Safety cost. Radon testing is not an allowable Health & Safety cost. 	
Allowable Testing/Inspection	
Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
<ul style="list-style-type: none"> The NeWAP does not use DOE WAP H&S funds for any “allowable testing” associated with Radon. 	
Required Occupant Education	
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>
<ul style="list-style-type: none"> Provide all clients EPA’s <i>A Citizen’s Guide to Radon</i> and inform them of radon related risks. Provide all clients the radon informed consent/consent to perform work form (Wx6) signed. A copy of the signed form must be included in the client file prior to receiving weatherization services. 	

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 type="checkbox"/>	Alternative Funds <input type="checkbox"/>	
Smoke/Fire Alarms:		
<ul style="list-style-type: none"> Battery operated smoke/fire alarms must be installed to replace non-working, outdated and missing units. Installation of Smoke Alarms and Carbon Monoxide Detectors, as per manufacturer’s instructions, is required on initial inspection of the home. Battery operated or plug-in 110 Volt Detectors, located one per sleeping level and one adjacent to a combustion appliance, are eligible for reimbursement. Installation is required on the initial inspection of the home. One unit should be located in the vicinity of every bedroom, one on each occupiable level and one adjacent to a combustion appliance. 		
Carbon Monoxide Alarms:		
<ul style="list-style-type: none"> Battery operated smoke/fire alarms must be installed to replace non-working, outdated and missing units. Installation of Smoke Alarms and Carbon Monoxide Detectors, as per manufacturer’s instructions, is required on initial inspection of the home. Battery operated or plug-in 110 Volt Detectors, located one per sleeping level and one adjacent to a combustion appliance, are eligible for reimbursement. Installation is required on the initial inspection of the home. One unit should be located in the vicinity of every bedroom, one on each occupiable level and one adjacent to a combustion appliance. 		
Propane Gas Detectors:		
<ul style="list-style-type: none"> Non-working outdated and missing propane gas detectors must be installed in framed homes and manufactured housing, on permanent foundations, that have propane combustion appliances. The gas detectors must be permanently installed according to the manufacturer’s instructions and 110 volts. 		
Allowable Actions		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
<ul style="list-style-type: none"> Testing of existing smoke/fire alarms to ensure that they are operating correctly. 		

Prohibited Actions		
Concur with DOE Guidance <input checked="" type="checkbox"/>		
Smoke/Fire Alarms, Carbon Monoxide Alarms and Propane Gas Detectors		
<ul style="list-style-type: none"> Using DOE WAP H&S funds for replacement of functional smoke/fire, CO or Propane Gas Detectors that are not beyond manufacturer's stated lifetime is prohibited. 		
Fire Extinguishers:		
<ul style="list-style-type: none"> The costs associated with providing fire extinguishers are not allowable Health & Safety Costs. 		
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 type="checkbox"/>	Alternative Funds <input type="checkbox"/>	
Smoke/Fire Alarms, Carbon Monoxide Alarms and Propane Gas Detectors		
<ul style="list-style-type: none"> Verify the operation of existing installed Alarms and Detectors. Verify the age of existing installed Alarms and Detectors. 		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds <input type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
<ul style="list-style-type: none"> Testing of existing smoke/fire alarms to ensure that they are operating correctly. 		
Required Occupant Education		
Concur with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	
<ul style="list-style-type: none"> Provide the client with verbal and written information on the use of newly installed Smoke/Fire Alarms, Carbon Monoxide Alarms and Propane Gas Detectors. Provide the client with a copy of the <i>Combustion Equipment Safety FACTSheet</i>. 		

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 type="checkbox"/>	Alternative Funds <input type="checkbox"/>	
<ul style="list-style-type: none"> NDEE requires ventilation be installed to meet the latest DOE approved ASHRAE 62.2. If occupant refuses the installation of a required ventilation fan the home must be deferred. 		
Allowable Actions		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	
<ul style="list-style-type: none"> If the ASHRAE normative Appendix A is employed and an existing fan is being replaced or upgraded to meet whole-house ventilation requirements, take actions to prevent zonal pressure differences greater than 3 pascals across the closed door, if one exists. 		
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 type="checkbox"/>	Alternative Funds <input type="checkbox"/>	
<ul style="list-style-type: none"> NeWAP Subgrantees are required to measure the fan flow of existing fans and of installed equipment to verify performance, and to complete pre- and post-weatherization ASHRAE 62.2 evaluations (Redcalc) to ensure that the home meets the Standard for Acceptable Indoor Air Quality and include both evaluations in the client file. Exhaust fans must be vented to the outdoors, and never into building attics or crawl spaces. They should have tight-fitting backdraft dampers. 		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>	

- Measure the fan flow of existing fans and of installed equipment to verify performance.
- Complete ASHRAE 62.2 evaluations, as discussed above, to determine required ventilation and fan flow requirements.

Required Occupant Education

Concur with DOE Guidance

Alternative Guidance

- Provide client with information on function, use, and maintenance (including location of service switch and cleaning instructions) of ventilation system and components.
- Provide client with equipment manuals for installed equipment.
- Include disclaimer that ASHRAE 62.2 does not account for high polluting sources or guarantee indoor air quality.
- Provide the client with a copy of the ASHRAE 62.2 FACTSheet.

6.18 – Water Heaters

(see Combustion Appliances for combustion related requirements)

Allowable Actions

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

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The costs associated with water heater repair and/or replacements are eligible for reimbursement through the NeWAP and all water heating measures that are indicated as cost-effective in the Energy Audit must be implemented.

- Water heater tank insulation must be a minimum R-11 blanket secured with tape and bound with a minimum of 2 wires, cords, plastic or nylon bands on the tank.
- Insulation must not be installed on water heaters if doing so voids the warranty of the unit.
- Insulation must not cover the pressure relief valve, end of the drip leg, draft hood, burner air inlet, pilot light access door, thermostat control, drain valve or the top of the water heater on natural gas or propane water heaters.
- Electric water heaters must have the top insulated and the thermostat control access panels accessible or marked and labeled.
- Insulation must not cover the pressure relief valve, the drip leg, high limit switch, and plumbing pipes or drain valve on electric water heaters.
- Water lines must be insulated a minimum of 6 feet (to a maximum of 18 feet, if cost effective) of the hot or inlet piping and a minimum of 6 feet of outlet piping in all directions from the water heater, using properly sized preformed pipe wrap or insulation specifically designed as pipe wrap.
- Accessible pipes must be insulated with 1-inch material having a minimum R-4 pipe insulation specifically manufactured as pipe insulation. Joints and elbows must be insulated.
- Each section of preformed pipe wrap must be fastened with a minimum of 3 wires, cords, plastic or nylon bands.
- Joints and elbows must be insulated.
- Duct tape must not be used as a means of fastening pipe wrap.
- Maintain a minimum of 6" between combustible pipe insulation and fuel-fired water heater draft hood and/or single wall metal vent materials.
- Water lines that have asbestos pipe wrap must not be insulated or sealed in the area containing the asbestos.
- In Manufactured Housing: All accessible water lines in the water heater compartment must be insulated using properly sized preformed pipe wrap or insulation specifically designed as pipe wrap.
- Existing unvented gas water heaters must be vented to the exterior.
- Missing or damaged Temperature and Pressure Relief Valves (drip legs) must be replaced as per local, state and national codes and be plumbed within 6 inches of the floor.
- A maximum of \$250 in material and labor may be spent to correct deficiencies in water heaters. If the material and labor exceed \$250, the unit must be replaced in owner occupied homes.
 - This maximum limitation does not apply to the addition of power vents to existing, operating units where drafting is negatively impacted by air sealing the home thru the weatherization process.
- In renter occupied homes, the owner must repair or replace the water heater if the replacement is required due to Health & Safety concerns. If the Health & Safety replacement is made in accordance with these installation standards the Nebraska Weatherization Assistance Program may contribute a maximum of \$500. Weatherization of the building must not proceed until the water heater has been repaired or replaced.
- All water heaters must have working pressure relief valves with drip legs without threaded bottoms.

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 type="checkbox"/>

- Visual inspection of all water heaters and related piping for safety and leaks
- See Combustion Appliances section for related combustion safety testing requirements.
- Conduct a fuel leakage test of the appliance piping and control system downstream of the shutoff valve in the supply line to the appliance.
- Visually inspect the venting system for proper size and horizontal pitch and determine that there is not blockage, vent size reduction or restriction, leakage, corrosion or other deficiencies that could cause an unsafe condition.
- Inspect burners and crossovers for blockage and corrosion.
- Determine that the pilot is burning properly and that main burner ignition is satisfactory.
- Test the pilot safety device to determine that it is operating properly.
- Visually determine that main burner gas is burning properly.
- Test for spillage at the draft hood relief opening.
- Verify that the water heater has a pilot access door, pressure relief valve with drip leg and draft hood.
- Inspect for evidence of water or combustion product leaks.
- Inspect for exposed wiring.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

- All required testing as discussed above.

Required Occupant Education

Concur with DOE Guidance

Alternative Guidance

- Discuss appropriate use and maintenance of units.
- Provide all paperwork and manuals for any installed equipment.
- Where combustion equipment is present, provide a copy of the Combustion Equipment Safety FACTSheet describing how to avoid backdrafting. Additionally provide information on how to recognize depressurization, the dangers of CO poisoning, and the fire risks associated with combustion appliance use.
- When bulk fuel tanks are not removed as part of the weatherization work, discuss and provide information on proper disposal.

6.19 – Worker Safety

Required Actions

Concur with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

DOE WAP H&S Funds

Alternative Funds

- Subgrantee crews and contractors must comply with Occupational Safety and Health Administration (OSHA) standards and Safety Data Sheets (SDS) and take precautions to ensure the health & safety of themselves and other workers, including the use of personal protection equipment.

Allowable Actions

Allowed with DOE WAP H&S Funds

Allowed with Alternative Funds

- Costs incurred by subgrantees to comply with OSHA requirements may be charged to the Health & Safety budget category.
- OSHA standards including, but not limited to:
 - respirator protection,
 - techniques for safely lifting heavy objects,
 - electrical equipment safety,
 - ladder safety, and
 - general worker protection.

Prohibited Actions

Concur with DOE Guidance

- Using DOE WAP H&S funds for major repairs as defined by the Grantee's H&S Plan is prohibited.

Define “major” repairs	
<ul style="list-style-type: none"> Costs exceeding \$200 are considered “major” repair costs in the NeWAP associated with Injury Prevention of Occupants and Weatherization Workers. 	
Allowable Testing	
Allowed with DOE WAP H&S Funds <input checked="" type="checkbox"/>	Allowed with Alternative Funds <input type="checkbox"/>
<ul style="list-style-type: none"> The costs associated with vermiculite/asbestos testing is an eligible Health & Safety expenditure in the NeWAP. 	

6.X – (Insert Additional H&S Items for Use of DOE WAP H&S funds)		
Required Actions		
Concur with DOE Guidance <input 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"/>	
Insert required item text		
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"/>		
What is prohibited		
Required Testing/Inspection		
Concur with DOE Guidance <input 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"/>	
Insert required item text		
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 type="checkbox"/>		
What is prohibited		
Required Occupant Education		
Concur with DOE Guidance <input type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	
Insert required item text		