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State of Ohio

2020

**Home Weatherization
Assistance Program
(HWAP)**

State Plan



**Development
Services Agency**

**Mike DeWine, Governor
Jon Husted, Lt. Governor**

Lydia L. Mihalik, Director

Feedback Received and Summary of Changes:

The Ohio Development Services Agency (Development) conducted listening sessions with the weatherization network beginning in October 2019 prior to drafting the 2020 HWAP State Plan. In addition to those listening sessions, various stakeholders also met with Development staff to give feedback on program administration and Policy Advisory Council (PAC) meetings were held on October 15, 2019 and January 15, 2020. The summary below outlines the feedback received and the proposed changes to the 2020 HWAP State Plan.

- **Clarify the current wait list structure and administrative responsibility of subgrantees or allow subgrantees full discretion when determining who should be served from the subgrantee wait list.**
 - Development has modified the language in section V.3 regarding how subgrantees are required to address clients on their wait list.
- **What can be done in situations of no heat in the home?**
 - While the HWAP is not intended to serve as an emergency repair program, Development will work to ensure other resources are available to address emergency situations for clients without heat in their home. This includes allowing additional flexibility with the subgrantee wait list, allowing the use of U.S. Department of Health and Human Services (HHS) Low-income Home Energy Assistance Program (LIHEAP) funds and modifying available LIHEAP funds during the utility crisis season.
- **Is an energy modeling software the best option or should a priority list of measures be considered?**
 - At this time, Development will continue to utilize the U.S. Department of Energy (DOE) approved energy modeling software and not utilize a priority list.
- **Provide a statewide fuel cost for energy modeling software.**
 - In January 2020, Development issued a statewide fuel cost for all subgrantees to utilize.
- **Provide clarification on the rule that if DOE funds are used within a home, then all DOE rules must be followed for those funds.**
 - Additional clarification will be provided to subgrantees within the HWAP Policies and Procedures Manual, but Development will not require subgrantees to follow DOE rules for other leveraged funding streams unless that program's policies require the DOE rules to be followed.
- **Seek approval for a multifamily audit tool from DOE and/or modify the per subgrantee 20 percent cap on multifamily units.**
 - Given that the current percentage of multifamily units completed annually in Ohio is between 5-6, Development will not seek approval from DOE for a multifamily auditing tool. Development will allow subgrantees to seek approval to complete more than 20 percent multifamily units within a program year (details provided in section V.5.2).

- **Provide clarity on allowable charges to the support category in the HWAP grant application. Reduce the number of budget categories within the grant application.**
 - Development will update the HWAP grant application budget instructions to provide additional clarity on allowable uses of administrative and operating funds. Development is continuing to update the data systems used for grant application input. As the HWAP grant application is updated, the budget categories will be reviewed to ensure they are all still appropriate and necessary.
- **Review the landlord contribution requirements for multifamily units.**
 - For multifamily buildings of 2-4 units, landlord contribution will not be required.
- **Renew the Housing and Urban Development agreement previously provided.**
 - This agreement would need to be renewed by the federal entities involved.
- **Utilize HWAP leveraged funds to produce a community/neighborhood approach to weatherization.**
 - Development will review any written requests for leveraged funds and determine if they are to be included in the HWAP State Plan.
- **ACSI feedback and action plan development.**
 - Based on the feedback received, Development will continue to conduct listening sessions with stakeholders on the HWAP State Plan and other administrative items. Additionally, Development will work to determine ways to better coordinate other funding opportunities such as the Community Housing Impact Program (CHIP).
- **Can the “interested in weatherization” box be added back to the LIHEAP application.**
 - As data systems are being updated, Development will utilize data on client interest in weatherization services and provide reports to subgrantees to improve their outreach efforts.
- **Review Annual Risk Assessment Tool Questions**
 - The specific content of the Risk Assessment tool is not included in the HWAP State Plan, but Development will review the annual Risk Assessment tool questions based on feedback received. Development also plans to request feedback as to what questions need updating.
- **Adjust formula for county specific goals**
 - The formula for county specific goals is based on eligible households within those communities. Development will not adjust the formula or number of required households within each county for the next program year. A subgrantee can request a waiver on this policy from Development. If a subgrantee wishes to reallocate funds from one county of service to another, the subgrantee must provide a detailed rationale as to why funds cannot be utilized in one county and clients would be better served in another county.
- **Support Weatherize Ohio Conference with DOE Training and Technical Assistance (T&T/A) Funds**
 - Development will allocate \$25,000 for the Weatherize Ohio Conference.



Additional feedback received from DOE and changes made prior to submitting the HWAP State Plan:

V.1.2 Correct that multifamily buildings of five or more units require DOE approval prior to measures being installed.

V.5.1 Added language indicating that all weatherization work will be performed in accordance with DOE approved procedures and materials listed in 10 CFR 440 Appendix A. Also provided the list of DOE approved use of materials not indicated in appendix A.

V.5.3 Added “independent QCI method” to clarify the Energy Auditor and QCI must be different individuals.

V.6 Added language indicating that vehicles and equipment with an acquisition cost of \$5,000 or more must use non-DOE funds.

V.7 Added the following language:

- In light of the recent COVID-19, Development is working with the HWAP PAC Technical Subcommittee and reviewing available resources for client and agency safety.
- Stand-alone roof replacements, structural repairs, or other non-energy related rehabilitation work is prohibited.
- H&S roof repairs meeting the above requirements may not exceed \$2500. Repairs that exceed the IRM or H&S limit are beyond the scope of HWAP.
- All Retrofit Installers, Crew Leaders, and Energy Auditors are trained to identify and properly treat all known hazards identified in WPN 17-7. Additionally, Energy auditors are trained on how to properly issue work orders and explain to occupants any known or potential hazards.
- If a situation arises that is not specifically addressed in the H&S plan a decision will be made on a case-by case basis. The subgrantee must submit to their technical monitor the necessity of the measure, cost justification, and photo documentation (if applicable). The technical monitor will review the information and respond to the subgrantee in writing within five business days.

V.8.4 Added “All new staff (agency or contractor) must complete required training (Basic Weatherization Tactics, and LRRP) within 180 days of the date of hire.”



Application for Federal Assistance: SF 424

OMB Number: 4040-004
Expiration Date: 10/31/2019

APPLICATION FOR FEDERAL ASSISTANCE SF-424 Version 02
1. Type of Submission: [] Preapplication [X] Application [] Changed/Corrected Application
2. Type of Application: [] New [X] Continuation [] Revision
3. Date Received 4. Applicant Identifier:
5a. Fed Entity Identifier: 5b. Federal Award Identifier: DE-EE0007943
State Use Only:
6. Date Received by State: 7. State Application Identifier:
8. APPLICANT INFORMATION:
a. Legal Name: STATE OF OHIO
b. Employer/Taxpayer Identification Number (EIN/TIN): 311334820
c. Organizational DUNS: 808847743
d. Address:
Street 1: P.O. BOX 1001
Street 2:
City: COLUMBUS
County: FRANKLIN County
State: OH
Province:
Country: U.S.A.
Zip / Postal Code: 432161001
e. Organizational Unit:
Department Name: OHIO DEVELOPMENT SERVICES AGENCY
Division Name: COMMUNITY SERVICES DIVISION
f. Name and contact information of person to be contacted on matters involving this application:
Prefix: Ms First Name: MEGAN
Middle Name:
Last Name: MEADOWS
Suffix:
Title: DEPUTY CHIEF
Organizational Affiliation: OHIO DEVELOPMENT SERVICES AGENCY
Telephone Number: 6147280961 Fax Number:
Email: Megan.Meadows@development.ohio.gov



APPLICATION FOR FEDERAL ASSISTANCE SF-424

Version 02

9. Type of Applicant:

A State Government

10. Name of Federal Agency:

U. S. Department of Energy

11. Catalog of Federal Domestic Assistance Number:

81.042

CFDA Title:

Weatherization Assistance Program

12. Funding Opportunity Number:

DE-WAP-0002020

Title:

2020 Weatherization Assistance Program

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

ALL 88 OHIO COUNTIES

15. Descriptive Title of Applicant's Project:

2020 Ohio Home Weatherization Assistance Program (HWAP)



APPLICATION FOR FEDERAL ASSISTANCE SF-424 Version 02

16. Congressional District Of:
a. Applicant: Ohio Congressional District 03
b. Program/Project: OH-Statewide
Attach an additional list of Program/Project Congressional Districts if needed:

17. Proposed Project:
a. Start Date: 07/01/2020
b. End Date: 06/30/2021

18. Estimated Funding (\$):
Table with 2 columns: Category, Amount
a. Federal: 17,866,747.00
b. Applicant: 0.00
c. State: 0.00
d. Local: 0.00
e. Other: 0.00
f. Program Income: 0.00
g. TOTAL: 17,866,747.00

19. Is Application subject to Review By State Under Executive Order 12372 Process?:
a. This application was made available to the State under the Executive Order 12372 Process for review
b. Program is subject to E.O. 12372 but has not been selected by the State for review.
c. Program is not covered by E.O. 12372

20. Is the applicant Delinquent On Any Federal Debt? (If "Yes", provide explanation)
No

21. By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to
I AGREE
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency

Authorized Representative:
Prefix: Mr First Name: Michael
Middle Name:
Last Name: Fraizer
Suffix:
Title: Assistant Chief, Community Services Division
Telephone Number: 6144664507 Fax Number: 6147286832
Email: Michael.Fraizer@development.ohio.gov

Signature of Authorized Representative: Date Signed:
Authorized for Local Reproduction



**Annual File
Budget**

OMB Approval No. 0346-0044

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0007943		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address STATE OF OHIO P.O. BOX 1001 COLUMBUS, OH 432161001		4. Program/Project Start Date 07/01/2020	5. Completion Date 06/30/2021

SECTION A - BUDGET SUMMARY						
Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. DOE Grant Award	81.042	\$ 255,273.00		\$ 17,866,747.00		\$ 18,122,020.00
2.						
3.						
4.						
5. TOTAL		\$ 255,273.00	\$ 0.00	\$ 17,866,747.00	\$ 0.00	\$ 18,122,020.00

SECTION B - BUDGET CATEGORIES					
6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) GRANTEE ADMINISTRATION	(2) SUBGRANTEE ADMINISTRATION	(3) GRANTEE T&TA	(4) SUBGRANTEE T&TA	
a. Personnel	\$ 163,709.00	\$ 0.00	\$ 271,347.00	\$ 0.00	\$ 435,056.00
b. Fringe Benefits	\$ 57,298.00	\$ 0.00	\$ 94,973.00	\$ 0.00	\$ 152,271.00
c. Travel	\$ 10,000.00	\$ 0.00	\$ 15,000.00	\$ 0.00	\$ 25,000.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 10,000.00	\$ 0.00	\$ 12,499.00	\$ 0.00	\$ 22,499.00
f. Contract	\$ 0.00	\$ 1,518,258.00	\$ 775,000.00	\$ 1,324,884.00	\$ 17,112,538.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
i. Total Direct Charges	\$ 241,007.00	\$ 1,518,258.00	\$ 1,168,819.00	\$ 1,324,884.00	\$ 17,747,364.00
j. Indirect Costs	\$ 140,980.00	\$ 0.00	\$ 233,676.00	\$ 0.00	\$ 374,656.00
k. Totals	\$ 381,987.00	\$ 1,518,258.00	\$ 1,402,495.00	\$ 1,324,884.00	\$ 18,122,020.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00



BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0007943		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address STATE OF OHIO P.O. BOX 1001 COLUMBUS, OH 432161001		4. Program/Project Start Date 07/01/2020	5. Completion Date 06/30/2021

SECTION A - BUDGET SUMMARY						
Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1.						
2.						
3.						
4.						
5. TOTAL		\$ 255,273.00	\$ 0.00	\$ 17,866,747.00	\$ 0.00	\$ 18,122,020.00

SECTION B - BUDGET CATEGORIES					
6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) PROGRAM OPERATIONS	(2) HEALTH AND SAFETY	(3) LIABILITY INSURANCE	(4) FINANCIAL AUDITS	
a. Personnel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 435,056.00
b. Fringe Benefits	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 152,271.00
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 25,000.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 22,499.00
f. Contract	\$ 11,399,305.00	\$ 1,698,496.00	\$ 177,148.00	\$ 219,447.00	\$ 17,112,538.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
i. Total Direct Charges	\$ 11,399,305.00	\$ 1,698,496.00	\$ 177,148.00	\$ 219,447.00	\$ 17,747,364.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 374,656.00
k. Totals	\$ 11,399,305.00	\$ 1,698,496.00	\$ 177,148.00	\$ 219,447.00	\$ 18,122,020.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00



(08/05)

Expiration Date: 02/29/2020

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

(Grant Number: EE0007943, State: OH, Program Year: 2020)

IV.1 Subgrantees

Table with 2 columns: Subgrantee (City) and Planned Funds/Units. Lists various community action agencies and their corresponding funding and unit counts.



DOEF 540.2 (08/05)

OMB Control No: 1910-5127 Expiration Date: 02/29/2020

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

(Grant Number: EE0007943, State: OH, Program Year: 2020)

Table with 2 columns: Location (Summit City Dept of Planning & Economic Development (Akron)) and Amount (Units, \$). Total: \$16,337,538.00, 3,646 units.

IV.2 WAP Production Schedule

Table with 2 columns: Weatherization Plans (Total Units, Reweatherized Units) and Units (3,646, 21).

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

Average Unit Costs, Units subject to DOE Project Rules

VEHICLE & EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)

Table with 3 columns: Line Item (A-E), Description, and Amount (\$). Includes Total Vehicles & Equipment Budget, Total Units Weatherized, etc.

AVERAGE COST PER DWELLING UNIT (DOE RULES)

Table with 3 columns: Line Item (F-J), Description, and Amount (\$). Includes Total Funds for Program Operations, Total Dwelling Units, etc.

IV.3 Energy Savings

Method used to calculate savings: [X] WAP algorithm [] Other (describe below)

Table with 4 columns: Units, Savings Calculator (MBtus), Energy Savings, and Description. Rows for This Year Estimate, Prior Year Estimate, and Prior Year Actual.

Method used to calculate savings description:

Ohio will use the DOE algorithm to calculate energy savings.

Please note: The HHS LIHEAP funds will be used to leverage DOE funds and weatherize additional units in Ohio. Also note that energy savings projection is reduced slightly based on the decision to offer additional administrative funds to subgrantees, reducing production and therefore, energy savings.

IV.4 DOE-Funded Leveraging Activities

Ohio will not utilize any DOE funds for leveraging activities.

IV.5 Policy Advisory Council Members

IV.5 Insert list of policy advisory council members

- American Electric Power
- Community Action Council of Portage County
- Ground Level Solutions, Inc.
- Hocking, Athens, Perry Community Action
- LEADS Community Action Agency
- Miami Valley Community Action Partnership
- Ohio Association of Community Action Agencies
- Ohio Department of Aging
- Ohio Department of Mental Health and Addiction Services
- Ohio Partners for Affordable Energy
- Ohio Weatherization Training Center (OWTC)
- Public Utilities Commission of Ohio
- WSOS Community Action Commission

IV.6 State Plan Hearings (Note: attach notes and transcripts to the SF424)

Date Held, newspapers that publicized the hearings and the dates the notice ran

A public hearing was held April 27, 2020 seeking input on the draft 2020 HWAP State Plan. The transcript is attached, as well as the meeting notice. Notice was sent to the following media outlets: Columbus Dispatch, Cleveland Plain Dealer, Cincinnati Enquirer, Athens Messenger, Dayton Daily News, Portsmouth Daily Times, Akron Beacon Journal, Marietta Times, Toledo Blade, Cleveland Call & Post, and Lima News.

IV.7 Miscellaneous

- Megan Meadows, Deputy Chief, Office of Community Assistance (OCA), Community Services Division (CSD), Development, is the Business Officer for the Ohio HWAP State Plan. Megan Meadows will also serve as the grantee Principal Investigator for the Ohio HWAP State Plan. Her contact information is: Megan.Meadows@development.ohio.gov, (614) 728-0961.
- Subgrantees must exercise a buy-local preference to ensure that weatherization materials utilized for the program are produced in Ohio to the greatest extent that cost considerations, product availability, and quantity are warranted. In cases where an out-of-state bid or vendor is preferable, the subgrantee must provide documentation/justification in the file.
- To the greatest extent practicable, subgrantees are encouraged to leverage and coordinate weatherization activities with other housing rehabilitation and/or neighborhood revitalization efforts such as the Housing Assistance Grant Program, Utility Programs, or CHIP.
- To the greatest extent practicable, subgrantees are encouraged to weatherize existing affordable rental housing, especially those accepting rent subsidies, such as Section 8 or Rural Development rental assistance, or an existing Ohio Housing Tax Credit property.
- Subgrantees are encouraged to utilize state-certified Minority Business Enterprises and Encouraging Diversity, Growth and Equity businesses to provide weatherization materials and services to the greatest extent that cost considerations, product availability, and quantity warrant.
- 2019 American Customer Satisfaction Index (ACSI) Survey Action Plan: Development's ACSI score increased by 13 points from the 2017 score. While this improvement in its score is notable, Development is committed to continuing self-assess its programs to provide excellent customer service to the HWAP subgrantees. The areas Development will focus its efforts on



include: providing clear communication, providing additional time to review the draft HWAP State Plan, and additional time to prepare the annual HWAP grant application. These action items will be addressed specifically by releasing an update to the network on the statewide production, providing a clear summary with the draft HWAP State Plan as to what changes have been made, and making sure there are ample opportunities for subgrantees to provide feedback on program policies and administration prior to the HWAP State Plan submission to HHS. Development will work to ensure the draft HWAP State Plan is released in a timely manner and the HWAP grant application is released earlier this year so that subgrantees have time to prepare. Also based on feedback received, Development will create a recorded intake training and make it available online so subgrantees can access the material at any time. Additionally, Development will work to better coordinate the HWAP program with other state administered programs, such as CHIP.

Master File

V.1 Eligibility

V.1.1 Approach to Determining Client Eligibility

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

All dwelling units to be weatherized shall be determined eligible in such a manner to ensure that each weatherized dwelling unit meets the qualifications of Code of Federal Regulations (CFR) 440.22, 'Eligible Dwelling Units', which states that a dwelling unit shall be eligible for weatherization assistance under this part if it is occupied by a family unit:

1. Whose income is at or below 200 percent of the Federal Poverty Level determined in accordance with criteria established by the Director of the Office of Management and Budget.
2. Which contains a member who has received cash assistance payments under Title IV or XVI of the Social Security Act or applicable state or local law at any time during the 12-month period preceding the determination of eligibility for weatherization assistance; or
3. If the State elects, is eligible for assistance under the Low-Income Home Energy Assistance Act of 1981, provided that such basis is at least 200 percent of the Federal Poverty Level determined in accordance with criteria established by the Director of the Office of Management and Budget.

All income eligibility shall be documented by the subgrantee and will be subject to examination by Development, DOE, and the Comptroller General of the United States and/or their designated representatives. Client eligibility may be categorical or traditional, as defined below.

CATEGORICAL ELIGIBILITY

Categorical eligibility applies when one or more persons living in the dwelling unit has received cash assistance payments under Title IV or XVI of the Social Security Act or applicable state or local law at any time during the 12-month period preceding the determination of eligibility for weatherization assistance, or one or more persons in the dwelling unit is eligible for assistance under the Low-Income Home Energy Assistance Act of 1981.

TRADITIONAL ELIGIBILITY

Traditional eligibility applies to any household whose income is at or below 200 percent of the Federal Poverty Level determined in accordance with criteria established by the Director of the Office of Management and Budget, except that the Secretary may establish a higher level if the Secretary, after consulting with the Secretary of Agriculture and the Secretary of HHS, determines that such a higher level is necessary to carry out the purposes of this part and is consistent with the eligibility criteria established for the weatherization program under section 222(a)(12) of the Economic Opportunity Act of 1964; Pub. L. No. 88452, 42 U.S.C. § 2701 et seq. A complete collection of policies and procedures related to eligibility can be found in the Ohio HWAP Policies and Procedures Manual, section D, part 2 customer Eligibility and Application Process.

Describe what household Eligibility basis will be used in the Program

A household shall be defined as a family unit meeting the qualifications above in order to qualify for weatherization. In Ohio, any household meeting either Categorical or Traditional Eligibility would be eligible to receive weatherization services from the HWAP.

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

Ohio will follow the policies outlined in “Summary of Immigrant Eligibility Restrictions Under Current Law as of 2/25/2009” in the HHS guidelines, located at <https://aspe.hhs.gov/basic-report/summary-immigrant-eligibility-restrictions-under-current-law>

when determining eligibility of qualified and nonqualified aliens. Ohio will not deny access to any state or local benefits to any qualified alien that meets the definition of excepted services.

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

Before a client can be served by HWAP, the subgrantee must:

- Complete the HWAP application in Ohio Community and Energy Assistance Network (OCEAN).
- Verify and document income eligibility and notify the client of eligibility or ineligibility within 60 days of processing a completed application. Subgrantees are required to maintain records that include documentation of client eligibility.
- Determine client’s priority status.
- No dwelling unit will be weatherized without documentation that it is an eligible dwelling unit, as defined as 10 CFR 440.22.
- Subgrantees maintain records of previously weatherized dwelling units, as does Development. The database is checked prior to scheduling a household for service, to ensure that the dwelling unit has not been previously weatherized.
- If the house has been previously weatherized and is not eligible for reweatherization, as defined in 10 CFR 440.18, the dwelling unit will not be weatherized. If the house is eligible for reweatherization, the subgrantee will make the determination whether or not to reweatherize the house based on a number of factors including the energy usage of the house and the number of eligible households on the waiting list. Dwellings that were originally weatherized between September 30, 1975 and September 30, 1994, are eligible for reweatherization.



All household files must contain the required documentation to show eligibility including approved client applications, landlord agreements (if applicable), etc.

Appeals Procedures

Clients have 30 days from the date they receive their application notification to appeal decisions made regarding their HWAP application. Clients must be informed of this right when they receive their application and again in their notification letter.

Clients may also appeal if their application is not decided upon in 60 days. Clients must be informed of this right at the time an application is submitted.

Grounds for appeal are:

- HWAP application was denied.
- If the application was neither approved nor denied within 60 days after the application was submitted, unless such delay was the result of the client's lack of cooperation in providing necessary documentation to determine eligibility.

The above procedure must be prominently posted by the subgrantee in a common area accessible to all clients that apply for HWAP services.

Describe Reweathering Compliance

Ohio has adopted the reweatherization date of September 30, 1994. Dwelling units weatherized after this date may not be reweatherized using DOE funds. The priority is to serve dwelling units that have not received prior services. All dwelling units completed prior to September 30, 1994, must have an energy audit performed to cost justify any additional measures being installed. Subgrantees track weatherized structures to determine if the dwelling unit was previously weatherized. Also, the State uses OCEAN for tracking dwelling unit completions to verify that a dwelling unit has not been previously weatherized.

Describe what structures are eligible for weatherization

Structures eligible for weatherization include single-family, manufactured housing, and multifamily housing. All structures must be stationary and have a specific mailing (street) address. Campers and nonstationary trailers are not eligible for weatherization services. No weatherization may occur for vacant single-family homes.

Residences operating primarily as a business may not be weatherized.

Ohio has an agreement with the State Historic Preservation Office regarding weatherization services on dwelling units 50 years and older. A Program Comment was issued by the Advisory Council on Historic Preservation on March 11, 2013 pursuant to 36 CFR 800.14(e), published in the Federal Register on March 14, 2013, and extends the duration of the existing 44 Programmatic Agreements, and any future agreements that may be executed under the prototype Programmatic Agreement, until December 31, 2020. This included Ohio's agreement with our State Historic Preservation Office.



Weatherization measures are largely exempt from prior approval as defined in the agreement. A link to the agreement, which is now extended to 2020, is attached below:

<https://www.energy.gov/eere/wipo/downloads/ohio-state-historic-preservation-programmatic-agreement>

Describe how Rental Units/Multifamily Buildings will be addressed

Rental units are eligible for weatherization and represent a significant portion of the dwelling units weatherized in Ohio. Landlord contributions for eligible single-family and manufactured housing rental dwellings shall not be required per 10 CFR 440.22(d) and the Final Rule amending the DOE Weatherization Assistance Program regulations dated March 4, 1993, (58 FR 12514). Subgrantees may encourage landlord financial participation, but eligible single-family and manufactured housing dwellings may not be deferred for service if the landlord does not consent to a financial contribution. Ohio waives the contribution for carbon monoxide and smoke alarms for all rental units.

Written permission of the building owner or authorized agent is required prior to commencing work. For one-year post weatherization (one year after the final inspection date) the owner must agree not to raise the rent as a result of the weatherization performed on the rental unit. In the case of a rent increase, tenants are made aware of their right to appeal in Ohio's Landlord/Tenant agreement, which must be signed by both parties (owner and tenant) prior to commencing work.

In the situation where the eligible household's utilities are included in the rent payment, low-income accrual will be determined and documented by the subgrantee and contained in the client file. Measures related to Health and Safety (H&S) and energy education received by the occupant will contribute towards low-income accrual. In this instance, landlord financial participation will be encouraged but not required. Undue or excessive enhancement of any dwelling unit, including rental units, is prohibited. Ohio does not support the placement of liens on properties related to weatherization for any reason.

SINGLE-FAMILY UNITS

For single-family units, subgrantees are required to provide proof of ownership in each client file prior to commencing work. This includes manufactured homes. Most subgrantees are able to access documentation on county auditor's websites, including information on potential foreclosures. Single-family units for sale or in foreclosure are not eligible for weatherization.

MULTIFAMILY UNITS

Ohio requires prior approval for multifamily buildings of five or more units. An Energy Audit using the Queens Information Package (EAQUIP), or equivalent DOE approved audit program, review of the audit and an onsite visit by a state technical monitor is also required. The audit must be approved by DOE prior to the materials being installed. Funds are not set aside for multifamily projects in Ohio. Leveraged funds and projects with contributions from landlords are prioritized, as well as projects that propose significant energy improvements and positive impact on communities. In the case where the landlord can sufficiently document program eligibility or provide additional information to demonstrate that contribution is not feasible, the contribution requirement may be waived by the subgrantee/Development staff. The building eligibility guidelines in the HWAP Policies and Procedures Manual for Ohio state that prior to initiating work, the building must have at least 66 percent of units occupied by eligible clients (50 percent for two and four-unit properties), a valid energy audit (as prescribed in section V.5.2), owner contribution (when applicable), quotes for all work exceeding \$10,000 and any other pertinent information requested by the monitor. When these conditions are met, the building may be approved for weatherization and work may commence.

GROUP HOMES AND SHELTERS

The eligibility for group homes and shelters is specified in the "Definitions" section of 10 CFR 440 regulations. Shelters for the homeless, battered spouses, etc., may be weatherized. Subgrantees may count each 800 square feet as a unit or each floor of the shelter as a unit. Applications for HWAP services from group homes must list all persons living in the home and their incomes (if age 18 and older or an emancipated minor). Applications for shelters are permitted to list only the shelter name. Individual names of persons within the shelter and/or incomes are not required. Prior approval by Development is required to weatherize a shelter or a group home.

Describe the deferral Process

Conditions that prevent the weatherization of the dwelling unit may lead to a deferral. Deferral is recommended if conditions exist that prevent safe, effective, and/or meaningful weatherization.

Conditions preventing weatherization include, but are not limited to, the following:

- Standing water, mold, or other moisture issues that cannot be addressed with weatherization funding.
- Electrical or plumbing hazards or structural failures that cannot be addressed as a part of weatherization services.
- Friable asbestos or other asbestos issues that cannot be addressed with weatherization funding.
- Deteriorated lead-based paint (LBP) surfaces or when the extent and/or condition of LBP may create other H&S hazards.
- Evidence of large spread infestations of rodents, insects, and/or other vermin.
- Unsecured pets.
- Sewage or animal feces in the home.
- Improperly stored chemicals, combustible materials, or other fire hazards.
- Maintenance/housekeeping practices that limit access to the dwelling or create an unhealthy work environment.
- Major remodeling is in progress, which limits the proper completion of weatherization measures.
- Threat(s) of violence or abusive behavior to worker(s) or household member(s) during the weatherization process.
- The illegal presence or use of any controlled substance in the home during the weatherization process.
- Occupant has self-declared health conditions that prohibit the installation of weatherization materials.
- Preexisting compliance issues.
- The area is slated for redevelopment.
- The area is in a high-risk geographic area (e.g. a flood plain).
- Refusal by the client to remove certain space heaters, or other unsafe items.
- The dwelling unit is in foreclosure or for sale.
- Other issues, as defined by the qualified inspector and approved by the subgrantee's Energy Coordinator.



When possible, subgrantees are encouraged to make referrals or collaborate with other programs including utility sponsored weatherization programs, Healthy Homes programs, home repair programs, and other local resources, in order to best serve the client. Ideally, some of these services are provided by the same subgrantee installing the weatherization measures. However, it is the client's responsibility to correct the condition(s) causing the deferral in order for weatherization services to proceed. When the conditions causing the deferral have been addressed, clients are asked to contact the subgrantee to reevaluate the home. These clients are then given top priority to receive services and are not placed back on the wait list. Documentation regarding the reason for deferral is required in the client file, and subgrantees are encouraged to collaborate with their state technical monitor to make decisions regarding deferral. Please see attached template for tracking deferral/referrals.

V.1.3 Definition of Children

Definition of children (below age): 19

V.1.4 Approach to Tribal Organizations

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

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

Assistance to low-income tribe members and other low-income persons is equal.

V.2 Selection of Areas to Be Served

All 88 counties will be served in Ohio.

Ohio completes an annual Risk Assessment of subgrantees to evaluate performance and to determine if a subgrantee is administering an effective weatherization program. The Risk Assessment tool evaluates subgrantees based on administrative, technical, and fiscal management. A rating of "high risk" for two consecutive years on the annual Risk Assessment performed by Development, may result in a competitive proposal process for the subgrantee's territory after the current contract expires. Should the Risk Assessment rating result in a competitive proposal process for any subgrantee's territory, Ohio will proceed in accordance with 10 CFR 440.15.

V.3 Priorities

The following applicants are prioritized as required by 10 CFR 440.16 "Minimum Program Requirements":

- Elderly person(s)
- Disabled person(s)
- Dependent child(ren) in the home
- High energy burden households
- High energy user households



Appropriate documentation is required in the client file to substantiate the assigned priority for service delivery.

Weatherization funds are to be used to equitably serve all eligible clients with priority for service delivery to households meeting the conditions of 10 CFR 440.16. High energy burden/users are defined as a household at or below 175 percent of the Federal Poverty Level at the time of application. These households tend to expend more of their income on utility costs than the median for low-income users.

Ohio will utilize the current electronic data entry system (OCEAN) to track households identified as "High Energy Users" and as having a "High Energy Burden". This data will be reported in the DOE quarterly reports.

Clients meeting one or more of the priorities for service delivery as described above, will be considered "Priority Applicants". Clients that apply for HWAP services and do not meet one or more of the priorities for service delivery, will be considered "Traditional Applicants". All clients will be placed on the subgrantee waiting list for the applicable county in which they reside. Priority Applicants will be placed on the waiting list ahead of Traditional Applicants and ordered by eligibility date (oldest to newest). Under no circumstances shall a Traditional Applicant be served before a Priority Applicant. All applicants are required to re-verify the household income for the program annually. No applications on the waiting list should be older than one (1) year.

Each subgrantee is assigned a specific minimum number of units to complete per county, per program year, based on funds allocated. The first 25 percent (rounded up) of those planned units for that county, will be selected for service from the wait list based on earliest eligibility date (ordered from oldest to newest). After the first 25 percent of eligible applicant units have been designated, the remaining number of units will be selected for service from the wait list. The first 25 percent of eligible applicants must be served during the current program year. Subgrantees are encouraged to maximize the use of HWAP funds to coordinate with other federal, state, local, or privately funded programs in order to improve energy efficiency.

Development has a priority for service delivery waiver form available for subgrantee use. This form may be submitted to Development for acceptance and use that is not contrary to the rules set forth by DOE and the 10 CFR 440.16 "Minimum Program Requirements". A copy of this form is attached. Emergencies may take precedence over all other priorities. Emergencies are defined as life-threatening housing conditions. The HWAP Priority Waiver Request Form must be completed and approved by a state monitor prior to work commencing, and the HWAP Priority Waiver Request Form must be kept in the client file.

V.4 Climatic Conditions

The climate of Ohio is a humid continental climate (Köppen climate classification Dfa) throughout most of the state, except in the extreme southern counties of Ohio's Bluegrass Region, which are located on the northern periphery of the humid subtropical climate and Upland South region of the United States. Summers are typically hot and humid throughout the state, while winters generally range from cool to cold. Precipitation in Ohio is moderate year-round.



Severe weather is not uncommon in the state, although there are typically fewer tornado reports in Ohio than in states located in what is known as “Tornado Alley”. Lake effect snowstorms also are not uncommon on the southeast shore of Lake Erie, which is located in an area designated as “the Snowbelt” (source: Ohio Department of Natural Resources). The highest recorded temperature was 113 °F (45 °C), near Gallipolis on July 21, 1934. [31] The lowest recorded temperature was -39 °F (-39 °C), at Milligan on February 10, 1899. [32] (source: The National Climate Data Center). Ohio subgrantees use the following weather stations when completing energy audits: (Source: “Comparative Climatic Data”, National Climatic Data Center, NOAA, 2001.)

- Akron, Ohio: 6148 HDD + 679 CDD = 6827 Total DD
- Cincinnati, Ohio: 5200 HDD + 1053 CDD = 6253 Total DD
- Cleveland, Ohio: 6097 HDD + 712 CDD = 6809 Total DD
- Columbus, Ohio: 5546 HDD + 925 CDD = 6471 Total DD
- Dayton, Ohio: 5678 HDD + 935 CDD = 6613 Total DD
- Toledo, Ohio: 6488 HDD + 715 CDD = 7203 Total DD
- Youngstown, Ohio: 6446 HDD + 561 CDD = 7007 Total DD
- Fort Wayne, Indiana: 6198 HDD + 830 CDD = 7028 Total DD

V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials

All Ohio weatherization work will be performed in accordance with U.S. Department of Energy (DOE)-approved procedures and materials listed in 10 CFR 440 Appendix A. Additionally, DOE has approved the use of the following materials not indicated in Appendix A of 10 CFR 440:

- Light Emitting Diode (LED) bulbs, approved 11/27/18
- Spray foam as an insulation material, approved 11/27/18
- Energy Star Refrigerators, approved 11/20/19
- Extended measure lifetimes, approved 11/20/19

Ohio subgrantees must perform all work according to the National Renewable Energy Laboratory (NREL) Standard Work Specifications (SWS), and the State of Ohio Weatherization Field Guide for Home Energy Updates to acceptable standards of service delivery for the Ohio weatherization network.

The subgrantee’s signature on the HWAP grant agreement documents will serve as verification that work will be performed in accordance with NREL SWS specifications of work quality outlined in WPN 15-4, Section 2.

The following is an excerpt from the subgrantee agreement:

“Grantee hereby acknowledges and represents that it has current, complete, and up to date copies of the following rules, regulations, and guidelines:

- 10 CFR Part 440, U.S. Department of Energy Weatherization Assistance for Low-Income Persons
- 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
- The Home Weatherization Assistance Program State Plan for the current program year



- The Ohio Home Weatherization Assistance Program Policies and Procedures Manual
- All applicable Information Updates issued by Grantor
- The State of Ohio Weatherization Field Guide for Home Energy Updates

The State of Ohio Weatherization Field Guide for Home Energy Updates was completed by Development staff in conjunction with Saturn Resource Management and went into effect March 2019. The document was issued to all subgrantees and contractors. An electronic version of the field guide is also available online at <http://wxfieldguide.com/oh/#t=OHWxFg%2FTitle%2FTitle.htm>.

WEATHERIZATION PROGRAM STANDARDS

Weatherization Program Standards shall be determined in accordance with the State of Ohio Weatherization Field Guide for Home Energy Updates and NREL SWS in effect at the time. If a subgrantee subcontracts any portion of the HWAP in accordance with Section 17 of the subgrantee Agreement, the subgrantee has the additional responsibility to ensure that all programmatic information including T&T/A is received by the subcontractor and that the subcontractor is in compliance with all applicable program requirements, including but not limited to adherence to the NREL SWS and the State of Ohio Weatherization Field Guide for Home Energy Updates.

Field guide types approval dates:

- Single-Family: December 10, 2018
- Manufactured Housing: December 10, 2018
- Multifamily: December 10, 2018

V.5.2 Energy Audit Procedures

Audit Procedures and Dates Most Recently Approved by DOE

Single-Family: Weatherization Assistant National Energy Audit Tool (NEAT) Date of DOE approval: August 10, 2018

Manufactured Housing: Weatherization Assistant Manufactured Home Energy Audit (MHEA) Date of DOE approval: December 16, 2019

Multifamily Buildings: Date of DOE approval: Ohio will submit an audit and supporting documentation to DOE for buildings with 5-24 units (per WPN 19-4) for approval before commencing weatherization. Ohio has traditionally fallen below the 20 percent or fewer multifamily units completed within each program year. Currently, Ohio requires each subgrantee complete no more than 20 percent of their planned production with multifamily units each program year. If a subgrantee requests to complete an additional multifamily unit exceeding the 20 percent requirement, they must contact Development for prior approval.

For Program Year 2020, Ohio will continue to require all homes have a DOE approved energy audit to determine cost effective measures to be installed.

Only measures that are cost effective showing a Savings to Investment Ratio (SIR) of 1.0 or greater may be installed. Measures with an SIR of 1.0 or greater are determined to be cost effective, meaning the lifetime savings produced by the measure is greater than the total cost of installation.

All refrigerator replacements must have documentation in the administrative file that the appliance

was metered for at least two hours and the SIR is 1.0 or greater.

SINGLE-FAMILY HOUSING

The NEAT is used to determine cost effective measures for single-family homes.

In 1980, Ohio identified nine standard dwelling types categorized by details of attic, wall, and foundation construction. Ohio's basic housing types are as follows:

- Type A – Wood frame home with full basement and open joist attic
- Type B – Wood frame home with crawl space and open joist attic
- Type C – Wood frame home with combination crawl space/basement and open joist attic
- Type D – Wood frame home with slab foundation and open joist attic
- Type E – Wood frame home with full basement and knee wall attic
- Type F – Wood frame home with post foundation and open joist attic
- Type G – Block, concrete, or log home with slab foundation and open joist attic
- Type H – Manufactured housing with post foundation (see below for additional details)
- Type I – Block (solid wall), concrete, or log home with basement and/or crawl space and open joist attic

Two additional housing types address exceptions to the above categories:

- Type R – Retrofit, housing type does not meet any of the above categories, energy audit performed
- Type S – Shelter

MANUFACTURED HOUSING

The MHEA is used to determine cost effective measures for manufactured housing.

MULTIFAMILY

Multifamily buildings containing five or more units are weatherized based on audit results and require Development's prior written authorization. The EAQUIP or equivalent DOE approved audit program is currently approved for use in multifamily buildings. Multifamily weatherization represented approximately five percent of all Ohio weatherized dwelling units from July 1, 2018 to June 30, 2019 (185 of 3,670 total completed units).

All buildings with five or more units must be audited using EAQUIP or an equivalent DOE approved audit program. Subgrantees may solicit an outside engineering firm or contractor to perform an audit on this type of building. In all cases, Development reserves the right to limit expenditures per unit or to limit specific retrofits if Development determines that a subgrantee is not appropriately approaching the work being performed on units.

Buildings with 5-24 units with specific characteristics can be adequately addressed using NEAT, however, using an approved single-family tool on multifamily housing stock is still subject to DOE review prior to project commencement. Subgrantees must submit multifamily auditing protocols and/or project details on a case-by-case basis to Development for DOE's review and approval prior to starting work.

Buildings with 25 or more units must be audited using EAQUIP and protocols specific to this housing type. All buildings with 25 or more units require prior DOE approval on a case-by-case basis before



commencing work.

V.5.3 Final Inspection

As specified in 10 CFR 440.16(g), no dwelling unit will be reported to Development as completed until a Quality Control Inspector (QCI) has performed a final inspection and certified that applicable work has been completed in compliance with the NREL SWS, the State of Ohio Weatherization Field Guide for Home Energy Updates, and as determined by a DOE approved energy audit. In addition, to ensure a separation of duties, the Energy Auditor and QCI must be different individuals (independent QCI method). Under no circumstances is the QCI permitted to inspect their own work (e.g. install or help install the furnace and then complete the final inspection on the work performed).

Process to Ensure Adequate Quality Control Inspection

All final inspections must be conducted by a Building Performance Institute (BPI) Certified QCI. Currently, a total of 137 individuals in Ohio have earned the QCI credential to serve 25 subgrantees in 88 counties. Subgrantees may employ or contract for these services. Prior approval by Development is required for all contracted services. Subgrantees request approval by submitting appropriate documentation to Development, generally within the HWAP grant application. Approvals also may be granted throughout the program year when necessary. A master list of all contractors approved to work in weatherization is maintained by Development staff. Final inspection documentation and certification will be placed in the client's file. If monitored by Development staff, the file will contain signatures of the subgrantee QCI and state technical monitor QCI.

Relevant Policies and Procedures: Every dwelling unit reported as a "completed unit" must receive a final inspection ensuring that all work meets the minimum specifications outlined in the NREL SWS and the techniques described in the State of Ohio Weatherization Field Guide for Home Energy Updates and in accordance with 10 CFR 440.

Dwelling units must be inspected using criteria found in the specifications outlined in the Work Quality section of WPN 15-4.

Every client file must include documentation that certifies that the dwelling unit had a final inspection and that all work met the required standards. The inspection must be performed, and the Final Certification form signed by the QCI and the eligible client. The Final Certification form must be placed in the client file and uploaded to OCEAN along with Building Weatherization Reports (BWRs). Dwelling units without a valid final inspection will not be counted in production and could result in disallowed costs.

The QCI must include an assessment of the original audit, complete the Weatherization Audit Review Checklist, and confirm that the measures called for on the work order were appropriate and in accordance with the grantee audit procedures and protocols approved by DOE. Additionally, the following language is required on all final certification forms:

"I certify that the work completed on job number _____ meets all requirements of the NREL Standard Work Specifications and installation procedures as described in the State of Ohio Weatherization Field Guide for Home Energy Updates. I grant the Ohio Development Services Agency (Development) and its designees permission to use information associated with this job for the purpose of conducting weatherization studies or statistical analyses. I understand that no



information obtained for job number _____ shall be made public in such manner that the dwelling or its occupants may be identified, except with written consent by the occupant.”

STANDARDS AND TECHNIQUES FOR WEATHERIZATION:

Standards and Techniques for weatherization shall be determined in accordance with 10 CFR Part 440.21; the applicable provisions of the HWAP State Plan; and the rules and regulations promulgated pursuant thereto.

If a subgrantee subcontracts any portion of the HWAP in accordance with Section 17 of the subgrantee Agreement, the subgrantee has the additional responsibility to ensure that all programmatic information including T&T/A is received by the subcontractor and that the subcontractor is in compliance with all applicable program requirements, including but not limited to adherence to the NREL SWS and State of Ohio Weatherization Field Guide for Home Energy Updates.

The OWTC offers a three-day preparatory course in addition to standard inspector coursework in an effort to prepare students for the Energy Auditor certification test, which includes both a hands-on field test component and standardized test component. Ohio allows DOE T&T/A funds to be used up to six times per person, to take or retake any portion of the Energy Auditor exam and the QCI exam.

Final inspections are required to be signed by the eligible client. In the event the client refuses, subgrantees should contact their Development technical monitor for guidance. If the client allows Development's technical monitor to perform an inspection and the work is certified by a Development staff person with the QCI credential, the requirement for client signature may be waived in writing by Development staff, and the dwelling unit may be reported as a completed unit.

Inspection Forms

The Quality Control Inspection form (attached) is the state monitoring inspection form, based on the tool provided by DOE, and the final inspection certification form. This form is placed in the client's file and serves as a recording of all Quality Control Inspections performed on the dwelling unit(s).

Consequences for Failure to Provide a QCI

In the event a subgrantee submits a unit(s) without a certified Quality Control Inspection form or the QCI does not perform an adequate inspection, Development will take appropriate action. This may include additional training requirements, failing the unit(s), increased monitoring and/or disallowed costs for the unit(s). Consequences for failure of a QCI to inspect to the most recent approved NREL SWS and State of Ohio Weatherization Field Guide for Home Energy Updates, and other applicable codes:

- 1st violation will result in verbal warning, T&T/A with state certified QCI monitor, and subgrantee may be required to perform another Quality Control Inspection and/or additional work to bring the work up to the NREL SWS standards.
- 2nd violation will result in a written warning, T&T/A with state certified QCI monitor, and the subgrantee may be required to perform another Quality Control Inspection and/or additional work to bring the work up to the NREL SWS standards. The subgrantee and inspector must submit an action plan describing how they will ensure adequate inspections will be conducted in the future.

- 3rd violation may result in disallowed costs for subgrantee. A second written warning and the suspension of privileges to conduct Quality Control Inspections until additional training is completed and a state certified QCI monitor has conducted additional T&T/A and is satisfied the inspector can complete thorough and adequate inspections.
- 4th violation may result in the QCI being referred to BPI for revocation of certification and the cost of completed units inspected by the QCI in question may result in disallowed costs until the work is certified by an independent QCI.

V.6 Weatherization Analysis of Effectiveness

According to the Home Energy Affordability Gap Study 2018 (2nd series) published in April 2019, Ohio households with incomes below 50 percent of the Federal Poverty Level pay 27 percent of their annual income for their home energy bills. According to the most recent five-year American Community Survey, the number of Ohioans whose income is below 50 percent is nearly 338,000. More than 391,000 additional Ohio households live with incomes between 50 percent and 100 percent of the Federal Poverty Level and face a home energy burden of 15 percent. Bills for households with incomes between 150 percent and 185 percent of the Federal Poverty Level take up 7 percent of income. Ohio households with incomes between 185 percent and 200 percent of the Federal Poverty Level have energy bills equal to 6 percent of income. In 2018, the total number of Ohio households below 200 percent of the Federal Poverty Level fell slightly from the prior year.

Assessment of Effectiveness of Subgrantees

Ohio uses a variety of methods to assess the effectiveness of subgrantees. Monitoring, both technical and administrative/fiscal, is performed as indicated in section V.8.3. Ohio may require T&T/A and/or more frequent monitoring when necessary.

Additionally, Ohio has developed a Risk Assessment tool to evaluate each subgrantee's effectiveness in key areas, including financial audit and fiscal procedures, technical performance, and administrative performance. Items reviewed include single subgrantee audit findings, ability to meet production goals and other performance measures, expenditures, average cost per unit, ability to meet deadlines and monthly reporting requirements, H&S performance, staff qualifications and experience, procurement policies and procedures, and contractor/crew management. Subgrantees are identified as high risk, moderate risk, or low risk based on the results identified in the tool. All subgrantees will be assessed for risk annually following the program year of review. Results are shared with each subgrantee, and Development audit staff as a tool to develop subgrantee capacity and direct appropriate T&T/A. This tool also is used to compare performance between subgrantees.

During Program Year 2020, Ohio will seek feedback from subgrantees on the specific questions asked within the Risk Assessment tool. Ohio will utilize that feedback to update the Risk Assessment Tool to be used during Program Year 2021.

How are the comparisons used to develop training opportunities/priorities?

High risk subgrantees must submit a Corrective Action Plan to address the results of the Risk Assessment tool. Development's administrative monitors also follow up on results of the Risk Assessment and the subgrantees' plans for improvement at scheduled visits. T&T/A visits may be

required by Development or requested by the subgrantee to support those with performance issues. Subgrantees identified as high risk are placed in a Continuous Improvement Plan (CIP) until the next annual risk assessment is performed. Additionally, a designation of high risk for two consecutive years may result in the competitive rebidding of the service territory.

Incorporating Monitoring Feedback

Monitoring feedback is continuously incorporated into program procedures. Previous monitoring requirements or recommendations are noted in current monitoring reports, as are repeated required or recommended actions. Aggregate data on subgrantee performance is analyzed and used to provide T&T/A. Technical monitoring reports are copied to the OWTC, which tracks findings and uses the information to guide T&T/A efforts. OCEAN, Development's online database, also tracks the results of technical monitoring. Reports are available that summarize findings by subgrantee or for the entire network, breaking down findings by type. These reports also can be used to direct future monitoring and T&T/A.

Path of Continuous Improvement/Continuous Improvement Plans

When a subgrantee fails a technical monitoring visit (less than 60 percent of units monitored do not pass the QCI by Development staff), the subgrantee will be placed in a CIP. Frequency of subgrantee monitoring is increased, and technical assistance or training may be required.

When program management or fiscal findings are cited on an administrative monitoring visit, the subgrantee is given 30 days to respond. Failure to respond will result in noncompliance with sections 10 and 11 of the HWAP grant agreement and could result in disciplinary action. Training on administrative and fiscal policies is delivered by Development audit staff at conferences, meetings, webinars, all provider trainings, and other venues as needed.

Tracking Subgrantee Performance Reviews

High level information resulting from subgrantee performance reviews is tracked in an electronic data base. Tracked data includes subgrantee name, date of visit, number and percentage of units monitored, and response due date. More detailed information on technical findings, required actions, and pass/fail rate of units monitored is tracked in OCEAN. Statistics regarding subgrantee performance such as production numbers and air leakage reductions are collected on BWRs and tracked in OCEAN. Reports are reviewed for progress toward production goals, expenditures, anomalies and/or other questions and concerns, and may be referred back to subgrantees for explanation or corrections, or to the technical/administrative monitors for follow up, when applicable.

Monitoring Process for Improvement

Monitoring is formal, and scheduled in Ohio, for both programmatic and fiscal compliance. A monitoring report is sent to each subgrantee detailing all findings. All findings, except for H&S findings, must be resolved within 30 days. Ohio uses a H&S Notification Form and requires that any findings related to H&S must be resolved as soon as possible, no later than three (3) working days. The response is then reviewed and accepted via letter to the subgrantee. All findings become part of the Risk Assessment review for the subgrantee. More information on the monitoring process can be found in section V.8.3.

Costing of Measures

To ensure measures are being accurately priced, Ohio requires that subgrantees use an approved price list (required submission with grant application for approval) or obtain three bids for work completed by contractors. All vehicles and equipment with an acquisition cost of \$5,000 or more require prior approval from Development and non-DOE funds must be used. Ohio crew-based programs purchase inventory up front and are reimbursed by the grant upon installation of the materials. No grant owned inventory is permitted.

V.7 Health and Safety

In accordance with the Final Rule and WPN 17-7 and the NREL SWS, Development adopts the following approach to implementing H&S measures. Ohio defines H&S measures as the cost of materials and labor needed to eliminate or reduce hazards existing before, or potentially resulting from the installation of weatherization materials. No H&S measures can be performed in a home unless Energy Conservation Measures (ECMs) are also part of the scope of work. Subgrantees shall comply with all applicable state and local building codes and regulations.

Development provides its subgrantees with an allocation of funds, identified as a budget line item, to be used for required H&S activities on dwelling units being weatherized. For Program Year 2020, this will amount to 14.9 percent of the DOE Operations budget. From July 1, 2018 through June 30, 2019, weatherization subgrantees averaged \$1301.89 for H&S per household (total H&S expenditures of \$4,777,938 divided by 3670 total completed units). Specific H&S related measures are reported in the OCEAN data system. Traditionally, some subgrantees expend all H&S funds while others may reprogram excess to program operations, specifically in cases where leveraged funds are available to assist with H&S measures. Availability of these leveraged funds is not guaranteed. Therefore, Ohio proposes to budget 14.9 percent in order to cover the potential H&S needs of programs.

Ohio tracks H&S labor and materials costs on its BWRs. The BWRs are completed in OCEAN, making it possible to track and manage all H&S costs.

Development encourages subgrantees to maintain coverage for Pollution Occurrence Insurance, but it is not mandatory. Ohio performs compliance monitoring for Occupational Safety and Health Administration (OSHA) rules and regulations when monitoring in progress units and ensures subgrantees have Hazard Communication Plans in place.

Crew and contractor safety is the responsibility of the subgrantee. All workers are required to complete the OSHA 10-hour training. The subgrantee is responsible for enforcing all work rules to ensure a safe working environment for the workers, clients, and subcontractors. The subgrantee is responsible for ensuring workers and subcontractors are properly trained and certified, when certification is required.

Development requires subgrantees to purchase and equip their crews and Energy Auditors with the appropriate Personal Protective Equipment (PPE) necessary to perform work tasks. Supplies and equipment purchased may include respirators, protective coveralls, safety glasses, High Efficiency Particulate Air vacuums, supplied air respirator systems, and other safety items. Development also specifies that respirator training and fit testing are required of crew personnel and other local staff as applicable. The purchase and maintenance of PPE and other safety equipment is allowed. Each



subgrantee has a local T&T/A budget and those funds may be used to provide training and certifications to address H&S issues.

Technical reviews of subgrantees include verification that OSHA worker safety requirements are being implemented (Safety Data Sheets (SDS), PPE, lead and asbestos compliance, etc.). Onsite monitoring also includes verification that worker safety requirements are followed during in-progress jobs.

TRAINING

Training on H&S issues is provided by the OWTC. The OWTC and Development monitoring staff also provide onsite T&T/A upon request or requirement, to clarify field issues with regards to installation of H&S measures. See attached class list for a full list of training options related to H&S.

Required Training

Retrofit Installer

- Lead Renovation, Repair & Paint
- Blower Door Use
- Basic Weatherization Tactics
- OSHA 10

Crew Leader

- Lead Renovation, Repair & Paint
- Blower Door Use
- Basic Weatherization Tactics
- OSHA 10
- Crew Leader Operations

Energy Auditor/QCI

- Lead Renovation, Repair & Paint
- Blower Door Use
- Basic Weatherization Tactics
- OSHA 10
- Intro to Inspection
- Consumer Energy Education
- Heating Unit Inspection
- Initial Inspection
- NEAT/MHEA
- Energy Auditor Certification/BPI QCI Certification

All Retrofit Installers, Crew Leaders, and Energy Auditors are trained to identify and properly treat all known hazards identified in WPN 17-7. Additionally, Energy auditors are trained on how to properly issue work orders and explain to occupants any known or potential hazards.

DEFERRAL NOTIFICATION OF HEALTH OR SAFETY CONCERN THAT PRECLUDES SERVICES

Deferral is discussed in section V.1.2 of this application. The Ohio Deferral Form is preprinted in triplicate and provided in bulk to subgrantees. One copy goes to the client, another to the



homeowner/landlord, and the last copy remains in the client file for reference. Deferred clients who resolve the outstanding issues must be moved to the top of the priority list and served as soon as possible by the subgrantee. The form includes the client's name and address, a clear description of the problem, a statement indicating the conditions under which weatherization shall resume, the rights and responsibilities of both the subgrantee and client, and the client's and Energy Auditor's signatures.

CLIENT H&S

In light of the recent COVID-19, Development is working with the HWAP PAC Technical Subcommittee and reviewing available resources for client and agency safety..

Clients must be informed of any H&S risk discovered during the inspection process. In the case of a rental property, the property owner and/or authorized agent also must be notified. As potential hazards are identified, they are to be analyzed in terms of their severity and how they will be addressed, up to and including deferral. H&S expenditures also must be considered reasonable, even if allowable as an expenditure for weatherization. This is determined by the Energy Auditor. Clients may appeal these decisions to the subgrantee. If a potential hazard cannot be properly addressed using HWAP funds, the subgrantee must notify the client in writing (see Deferral section of V.1.2 for additional information).

Allowable HWAP measures fall into four broad categories: Ancillary Items (AIs), ECMs, Incidental Repair Measures (IRMs), and H&S Measures. Stand-alone roof replacements, structural repairs, or other non-energy related rehabilitation work is prohibited.

AIs

Items necessary for the proper installation of weatherization materials, as required by materials manufacturers, general construction, and/or HWAP field standards. The costs of AIs and their installation shall be included within the cost of an individual ECM when calculating the SIR.

ECMs

Installation procedure performed for its anticipated energy savings. ECMs must be cost justified with an SIR of 1.0 or greater using Weatherization Assistant software for single-family and manufactured homes, and EAQUIP or other DOE approved audit software for structures with five or more units. Window and door replacements shall not be included in the air sealing ECM. Ohio does not permit partial weatherization of a building.

IRMs

Per WPN 19-5, IRMs are defined as "A repair necessary for the effective performance or preservation of newly installed weatherization materials, but not part of a standard installation". IRMs must be limited to those minor repairs necessary for effective performance or preservation of ECMs installed by the subgrantee. HWAP funds shall not be used to install IRMs solely to protect existing materials in the dwelling. IRMs must be justified by written and photo documentation in the client file. IRMs must include an explanation for their need and relationship to a specific ECM or group of ECMs as required in WPN 19-5.

These costs are recorded on the BWRs. IRMs may not exceed \$1,200 (DOE) for materials and labor for the structure for single-family and manufactured homes. All IRMs for multifamily structures of five or more units must be submitted with the building audit for approval and will be determined on a case by case basis, based on the reasonableness of the requested repair. IRMs may include, but are not limited to, replacing a pane of broken window glass, minor repairs to drywall or floors, moisture repairs, vapor retarder installation, flue repair, window and door replacements, and electrical repairs or other minor repairs that preserve the integrity of the associated ECM(s). Ohio does not distinguish "minor" from "major" repairs. Instead, Development limits the amount of the IRMs by the dollar amount stated above, and subgrantees may not exceed this limit for IRMs.

H&S MEASURES

Measures necessary to maintain the physical wellbeing of both the occupants and/or weatherization workers, where the action is necessary to effectively perform weatherization work or is necessary as a result of weatherization work. The reason for all H&S work must be documented in the client file, including photographs and written documentation. Energy Auditor approval is required for all H&S work completed in the home. No H&S measures can be performed in a home unless ECMs are also part of the scope of work.

Heating systems must be evaluated to determine if they can be cost justified with an SIR of 1.0 or greater. When the heating system can be cost justified, it must be treated as an ECM. Subgrantees also may utilize a buydown of heating system replacements on large multifamily housing projects, in order to achieve an SIR of 1.0 or greater. Buydown funds must be from a nonfederal source.

Components of H&S in regard to Weatherization Air Conditioning and Heating Safety

"Red tagged", inoperable, or nonexistent heating system replacement or installation is allowed where climate conditions warrant, unless prevented by other guidance herein. Ohio's climate requires weatherization and is considered a "heating climate", therefore, Ohio addresses heating system replacement with the HWAP program. Ohio does not allow for the replacing of air conditioners (ACs). Repairs or replacement of an AC system may only be made when current operation of the AC unit endangers the operation of the heating system.

Heating systems (i.e. furnaces, boilers, vented space heaters) are to be repaired or replaced when the existing heating unit is not operational, is unsafe, or is nonexistent. This is to ensure steps are taken to eliminate unsafe levels of carbon monoxide in the living area, and to protect the safety of the inspector while obtaining diagnostic readings. Justification documentation and photos demonstrating the specific issue(s) with the existing system are required in the client file. Unsafe primary heating units must be repaired, replaced and removed, or rendered inoperable, or deferred. Replacement or installation of secondary heating units is not allowed. Unsafe secondary heating units, including space heaters, must be repaired, removed or rendered inoperable, or deferred.

Trained staff must first attempt to cost justify the heating system replacement and install the system as an ECM. If not cost justified, the system and all components must be charged to the H&S category. Repairs must be charged to the H&S category.

Client education must be performed to explain the importance of appropriate use and maintenance of the replacement unit. In addition, the subgrantee must facilitate the proper disposal of the old heating appliance and bulk fuel tanks, when applicable. When deferral is necessary, subgrantees must

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.

Code Compliance and Inspection Requirements

Installation of heating systems requires compliance with appropriate industry standards and applicable building code(s) in the municipality where installation is taking place.

Building permits shall be secured, where required, for all heating system work. The manufacturer approved initial startup procedures must be followed before any heating system is put into operation. Safety inspections related to the heating system should include, but not be limited to, a check for adequate floor protection, and code compliant clearances to walls and other combustible materials, and worst-case depressurization draft test, when applicable.

Appliances and Water Heaters

Replacement of water heaters using H&S funds is allowed. Subgrantees must ensure the replacement water heater unit drafts properly in worst-case depressurization scenario, and that the combustion analysis readings of the water heater unit are within the appropriate guidelines. Replacement and installation of appliances other than water heaters – such as cook stoves, washing machines, or clothes dryers – is not allowed. Client education is required to explain the importance of appropriate use and maintenance of the replacement water heater unit. In addition, the subgrantee must remove and properly dispose of the old water heater. The cost to clean and adjust the gas pressure to eliminate the production of carbon monoxide in a cook stove (stove top burners or oven), must be charged to the H&S budget category. Additionally, the installation of any parts to the cook stove (i.e. pressure regulator, orifices, flexible range connectors) must be charged to the H&S budget category.

The client will be notified if combustion and safety hazards exist, including the importance of using exhaust ventilation when cooking and the importance of keeping the oven and burners clean, to limit the production of carbon monoxide.

Asbestos

Subgrantees must take all reasonable and necessary precautions to prevent asbestos contamination in the home. The cost of generally removing and/or abating asbestos is prohibited. Do not conduct a blower door test where friable suspected asbestos containing material (ACM) is present. “Friable” means the material can be crumbled, pulverized, or reduced to powder by the pressure of an ordinary human hand.

Asbestos in Siding, Walls, Ceilings, etc.

The cost of permanently removing asbestos containing, cementitious siding materials remains prohibited; however, it is allowable to remove and reinstall such type of siding material to insulate the sidewalls of eligible dwelling units. This shall be performed by a person trained in safe work practices. Cutting, drilling, or sanding the cementitious siding material remains prohibited. The exterior wall surface and subsurface, floors, walls, and ceilings should be visually inspected for suspected ACM, prior to drilling or cutting.

Asbestos in vermiculite

Based upon concerns regarding the possible presence of asbestos in vermiculite insulation that may be found in homes, Development has adopted the following protocols.

Rules for homes containing vermiculite insulation:

- Don't disturb or remove vermiculite.
- If unsure whether material contains asbestos, when warranted, a qualified asbestos professional will be contacted to assess the material and to sample and test as needed.
- Caution should be used when using a blower door in a home with vermiculite. When vermiculite is present, perform a blower door pressurization test, do not depressurize the interior of the home.
- If the test results indicate the presence of asbestos in the vermiculite, no work may occur in the area containing vermiculite, and a deferral of the job may be necessary.
- At no time should the vermiculite be disturbed unless testing determines it does not contain asbestos.
- Testing must be conducted by a licensed Asbestos Hazard Evaluation Specialist.

Rules for homes containing vermiculite insulation that have been tested and cleared of asbestos:

- If the vermiculite insulation does not contain asbestos, normal weatherization activities may continue. A copy of the clearance test must remain in the client's file.
- Caution should be used when using a blower door in a home with vermiculite that does not contain asbestos. When vermiculite is present, perform a blower door pressurization test, do not depressurize the interior of the home.
- If it is determined that weatherization work cannot be performed without creating a hazard, the work must be deferred. The client is to be informed in writing of the potential hazard.
- Follow all H&S instruction from the inspector.
- Wear adequate PPE.

Asbestos on Pipes, Furnaces, other Small Covered Surfaces

Subgrantees should assume asbestos is present in suspect covering materials. When suspected friable ACM is present, take precautionary measures as if it is asbestos, unless testing determines otherwise.

Where subgrantees work on heating and distribution systems, including related piping, the cost of asbestos removal, or other less costly approaches such as encapsulation, is allowed and must be charged to the H&S budget category. The minimum amount of suspect covering material shall be disturbed when replacing the heating unit.

Appropriate asbestos control professional certification/training is required to abate the ACM. However, in all cases, compliance with all codes and U. S. Environmental Protection Agency (EPA) regulations is required.

Subgrantees must inform the client in writing that suspected ACMs are present and what precautions will be taken to ensure the occupants' and workers' safety during weatherization. If testing was performed, subgrantees must notify the client in writing of testing results and instruct clients not to



disturb suspected ACM.

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

Biologicals and Unsanitary Conditions – odors, mold, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.

Subgrantee audit staff have the responsibility as part of the energy audit/assessment process to identify biological hazards such as mold, odors, raw sewage, or rotting wood. Energy Auditors must take any conditions identified into consideration in the selection of measures appropriate for that building. In instances where the hazard is of such a severity as to cause undue safety or health concerns to crews, subcontractor staff, or occupants, the Energy Auditor is authorized to defer weatherization until the hazard has been addressed. The cost of removal or mitigation of conditions that may lead to or promote biological concerns and unsanitary conditions, is allowable to the extent that removal or mitigation is necessary to allow effective weatherization work, and/or to assure the immediate or future health of workers and clients.

Unsanitary conditions are occasionally present that put crews and staff at risk, and it is the responsibility of the client to correct them before work can begin. Subgrantees are not expected to address these conditions. These items may include, but are not limited to, pet or human feces in living areas, evidence of hoarding or “path houses” where access to measures is obstructed, rotting wood, etc.

Addressing bacteria or viruses is not an allowable cost. Deferral may be necessary in cases where a known agent is present in the home that may create a serious risk to occupants or weatherization workers.

Subgrantees must notify the client of unsanitary conditions and document conditions with pictures to be included in the client file.

Building Structure and Roofing

Inspectors must be aware of the structural condition of the dwellings to be weatherized. Ohio allows for IRMs necessary to preserve the integrity of newly installed ECM(s). Roof repairs are allowable as a H&S measure if it resolves a bulk water intrusion issue that is the cause of visible biological growth, and is documented with written explanation and photos of the biological growth, in the client file. H&S roof repairs meeting the above requirements may not exceed \$2500. Repairs that exceed the IRM or H&S limit are beyond the scope of HWAP. Rehabilitation of dwellings is beyond the scope of HWAP.

If it is determined that the dwelling unit is unsafe or requires repairs greater than allowed by the scope of the program, then planned weatherization activities must be deferred, and a referral should be made to a local home rehabilitation program. Subgrantees must notify the client of structurally compromised areas, and document with pictures to be included in the client file.

Code Compliance

Correction of preexisting code compliance issues is not an allowable cost, other than where weatherization measures are installed in a specific room or area of the home. State and local codes

(or rules of the jurisdiction having authority) must be followed while installing weatherization measures. Condemned properties and properties where H&S conditions exist that cannot be corrected under the program, should be deferred.

The Energy Auditor will conduct a visual inspection to identify local code compliance issues. Subgrantees must notify the client in writing of observed compliance issues which result in a deferral, and describe the corrections that must be completed for weatherization to commence.

Combustion Gases

Proper venting to the outside for combustion appliances, including gas dryers, is required. Flue systems must be in compliance with all applicable state and local codes, and be verified to vent properly by passing all of Ohio's required draft testing. In the case of a plugged or nonfunctioning vent on a combustion appliance, appropriate steps must be taken to repair or replace the vent when combustion testing indicates a problem.

The subgrantee may not continue with weatherization work, particularly air sealing the structure, until the combustion gases have been appropriately vented away from the living area.

H&S inspections make sure that systems are present, operable, and performing. The H&S inspection of combustion appliances includes, but is not limited to, the following items:

- The rated and measured British Thermal Units (BTU) input of each combustion appliance
- Complete electrical inspection of the furnace including proper grounding, polarity, wiring connections, fuse type and size, element amperage, and disconnect requirements
- Inspection of all combustion appliance fuel line leaks from the meter to the combustion appliance(s) is required
- An evaluation of the adequacy of combustion air for combustion appliances
- Verify there are no open return air ducts/leaks in the combustion appliance zone
- Combustion analysis testing of all combustion appliances (furnace/Domestic Hot Water Tank (DHWT))
- Inspection and replacement if necessary, of the furnace filter
- Verify a properly installed temperature and pressure relief valve on the DHWT
- Measurement and adjustment, if necessary, of the water temperature
- Pre- and post-worst-case draft testing utilizing Ohio's worst-case draft form

If at any time the ambient carbon monoxide level exceeds 35ppm, discontinue testing and evacuate the home. Client education must be performed to explain the importance of combustion safety and possible hazards.

Electrical, other than Knob and Tube Wiring

The cost to correct the presence of electrical system hazards, such as inadequately sized service, improperly grounded service, hazardously located service, inadequately sized or insufficient number of circuits, circuits in poor condition (i.e. live bare wires, etc.) and wiring inappropriate to its location, are allowable costs to the H&S budget category. Additional load may not be added to an already overloaded service. Weatherization services must be deferred if the electrical problem cannot be corrected. A licensed electrical contractor shall be used to perform any electrical work needed to

correct the hazard.

Energy Auditors will conduct a visual inspection for electrical issues and hazards.

Client education must be performed to explain the importance of basic electrical safety/risks and the hazards of overloading circuits.

Electrical, Knob and Tube Wiring

As part of the initial inspection process, inspectors must make note of the presence of knob and tube wiring, its condition, and test to see if it is still being used to distribute power.

The electric code prohibits the insulation of sidewall cavities with live knob and tube wiring present. In attics and other accessible areas, the insulation must be channeled around knob and tube wiring with a minimum of three inches of air clearance around the wiring. In some instances, where an energy audit cost benefit analysis indicates a 1.0 or greater SIR, rewiring of the wall cavities or attics is included as part of the sidewall or attic insulation measure. This work is performed as required by state and local code. It is allowable to charge rewiring to the H&S budget category, or to defer the dwelling unit if cost prohibitive. It also is acceptable to install all other allowable measures dwelling unit if meaningful weatherization is still possible.

Energy Auditors will inspect for the presence and condition of knob and tube wiring and check for alterations that may create an electrical hazard. Client education must be performed to explain the importance of basic electrical safety/risks and the hazards of overloading circuits.

Fire Hazard

NREL SWS and the State of Ohio Weatherization Field Guide for Home Energy Updates includes guidance that governs combustion appliances and their associated venting systems. The guidance outlines how to identify and eliminate potential fire hazards including inadequate clearances between combustion appliance cabinets, venting systems, and combustible materials. The NREL SWS also states how to handle potentially dangerous creosote buildup in chimneys and wood stove flues. Potential fire hazards are addressed with H&S funding or other leveraged funding sources.

Adherence to appropriate National Fire Protection Association (NFPA) standards when repairing or replacing appliances minimizes the potential for fire hazards. If possible, the Energy Auditor should address any potential fire hazards within the scope of the weatherization program; however, the client must be notified when a fire hazard is identified, and it cannot be treated during the weatherization process. In some cases, this may result in deferral or referral of the home until the fire hazard can be corrected.

The Energy Auditor will inspect the home for potential fire hazards.

Client education must be performed to explain the importance of addressing any fire hazards within the home.

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

Formaldehyde, tobacco smoke, thinners, solvents, cleaners and other pollutants that are capable of negatively impacting indoor air quality should be identified during the initial inspection. Basic strategies such as proper storage and ventilation, are part of client education and can be used to eliminate problems. If pollutants pose a risk to workers and removal cannot be performed or is not allowed by the client, the dwelling unit must be deferred. Removal of pollutants not necessary to perform weatherization (i.e. cleaning old paint cans and oil out of garages) is not allowed.

The Energy Auditor will inspect the dwelling unit for pollutants that may pose a risk to weatherization workers or the occupants.

Client education must be performed to explain the importance of safe 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

All gas leaks must be repaired prior to weatherization work.

When a gas leak is found on the utility side of the service, the utility must be contacted, and repairs completed by the utility before weatherization may proceed. Fuel leaks that are the responsibility of the client must be repaired before weatherization may proceed.

Test exposed gas lines from the utility coupling into and throughout the home. When a potential gas leak is detected with an electronic leak detector, it must be verified with a commercially available solution for detecting gas leaks. Subgrantees must complete a visual inspection on bulk fuels to determine if leaks exist.

Subgrantees must inform the client, in writing, of any fuel leaks.

Injury Prevention of Occupants and Weatherization Workers

Subgrantees must take all reasonable precautions against performing work on homes that will subject workers or occupants to H&S risks. Repairs of stairs and installation of handrails may be conducted only when necessary to effectively weatherize the home and may be charged according to the guidelines in WPN 12-09 to either IRMs or H&S miscellaneous budget categories when meeting those definitions.

For example, if the stairs to the basement are broken and not safe to use, but the heating appliances are located in the basement, then it would be necessary to repair the stairs to effectively weatherize the home. If the measures are not necessary to perform effective weatherization, they are not allowed. For example, if the stairway to the second floor was missing a handrail and the occupants needed a railing for stability when going up or down the stairs, this would not be allowed because it is not affecting the weatherization of the home. When possible, subgrantees may make referrals to other programs or use leveraged funds to address these concerns.

Energy Auditors will observe if dangers are present that would prevent weatherization or potentially

injure workers or occupants.

Clients must be informed in writing, by inspectors and/or workers of observed hazards and associated risks, when applicable.

LBP

The cost of LBP abatement is prohibited. However, the cost to test building materials for the presence of LBP and the cost of precautions to prevent causing a lead paint contamination problem while installing weatherization materials is allowable. LBP was used on the majority of dwelling units constructed prior to 1978. If LBP must be disturbed (cut, scraped, sawn, drilled, etc.) during the weatherization work, that work shall be done in a “lead safe” manner. Ohio implements the approach defined by the EPA under the Lead Renovation, Repair, and Painting (LRRP) Rule.

Weatherization contractors, crew members or other persons installing ECMs for HWAP must earn the EPA Certified Renovator credential.

Other entities performing work (e.g. Heating Ventilation and Air Conditioning (HVAC), plumbing, or electrical professionals) for HWAP and working in pre-1978 dwellings where the possibility exists to disturb painted surfaces of an area greater than six square feet per room for the interior, and/or 20 square feet for exterior work, must have an EPA Certified Renovator onsite.

Weatherization contractors and other entities performing work in pre-1978 homes that will disturb painted surfaces of an area greater than six (6) square feet per room for the interior, and/or 20 square feet for exterior work, must have an EPA Firm Certification.

The EPA Certified Renovator credential requires completion of the eight-hour LRRP training program from an EPA accredited training provider, or renewing certification with a four-hour refresher class. Subgrantees may assign lead safe work only to contractors meeting this requirement.

Documentation for training credentials must be onsite (i.e. copies of the training certificate or the certification as a renovator must be available).

Even when the work has disturbed less than the de minimis amounts of paint as specified by the EPA, all work should be performed in a lead safe manner. Proper record keeping using the Post Renovation Lead Recordkeeping Checklist must be completed by the subgrantee. Other subgrantee required paperwork includes:

- Copies of the EPA Certified Renovator and other installer’s certificates;
- Pictures of the containment area with a posting of the job number attached to the containment materials; and
- Picture(s) of the Approved Wipes alongside the Cleaning Verification Card showing that the cleaning process has passed, with the job number in the picture.

All of Development’s technical field staff have received training in Lead Safe Weatherization (LSW) and have completed the LRRP course.

All subgrantees are required to provide clients a copy of the EPA’s “The Lead-Safe Certified Guide to Renovate Right”, if applicable, prior to the start of work. This brochure will be given to an adult

resident of each pre-1978 residential dwelling to be weatherized. Written acknowledgment by the adult resident is required, proving the adult resident received the brochure. A written certification by the subgrantee stating the brochure was delivered to an adult resident but the subgrantee was unsuccessful in obtaining a written acknowledgment, as directed in the publication, is also acceptable. The written acknowledgment or certification must be maintained in the client file.

Expendable materials and safety equipment associated with working lead safe (including but not limited to safety suits, trash bags, face masks, and plastic covers) may be charged to the Support Equipment/Tools category.

Ohio's deferral policy will be used in instances where the homeowner or landlord has notified the subgrantee of LBP issues existing or where lead poisoning has occurred to a member of the household. Referral is recommended to other programs designed to address the concerns.

Mold and Moisture

Limited water damage repairs can be addressed by weatherization workers. Correction of conditions that may create moisture and mold are allowed when necessary, in order to weatherize the home and to ensure the long-term stability and durability of the measures. However, existing mold and moisture issues greater than 10-square-feet cannot be addressed and must be deferred.

Testing for mold to determine the type or severity is not an allowable cost. Mold cleanup is not an allowable H&S cost. Surface preparation where weatherization measures are being installed (e.g., cleaning mold off window trim to apply caulk) must be charged as part of the ECM, not to the H&S budget category.

All subgrantees are required to complete an HWAP Mold Assessment and Release Form after the energy audit and prior to the work being started. It is expected that subgrantee staff will document with photos, any existing mold and mildew problem.

Ohio's deferral policy will be used in instances where the remediation of the problem is beyond the scope of the weatherization program. When a deferral is required, the subgrantee should refer the homeowner to another program that can address the issue. Moisture problems that cannot be corrected within the scope of the program include, but are not limited to the following:

- Installation of a new roof;
- An enclosed crawlspace or basement that has standing water for significant periods of time due to inadequate ground or surface water drainage; and,
- Structures exhibiting signs of major moisture problems such as blistering paint and extensive mold/mildew on the inside of the house.

Drainage

Major drainage issues (for example, earth sloping toward dwelling) are beyond the scope of HWAP. Homes with conditions that may create a serious health concern and require more than IRMs should be deferred.

Client education must be provided to explain the importance of cleaning and maintaining drainage systems, as well as the benefits of landscape design (where applicable).



Occupants preexisting or Potential Health Conditions

When a person's health may be at risk and/or the weatherization activities could constitute a health or safety hazard, the occupant at risk will be required to take appropriate action based on severity of risk. Appropriate action could include but not be limited to removal of excessive trash and debris, proper cleaning of moisture damaged surfaces, or removal of an unapproved alternative heat source. Failure or the inability to take appropriate action must result in deferral.

Subgrantee intake staff should begin the discussion with the client as part of describing the program and what measures may be performed. The subgrantee must be cognizant of collecting this personal information and the protections that clients have with the Health Insurance Portability and Accountability Act of 1996.

The Energy Auditor will explain what measures will be installed and that there may be some aspects of weatherization (i.e. dust during insulation) that may worsen existing health conditions. The Energy Auditor and client will have an opportunity to discuss precautions that can be taken to minimize risks. Alternative work protocols should be implemented by weatherization workers, if necessary, to avoid aggravating any existing health condition. It may be necessary for the client to leave the home during the work process. Refusal or inability to leave the home may result in deferral and/or referral to another local program, if available.

Energy Auditors will explain the weatherization work and the potential conditions that may put the occupants with existing health conditions at risk.

Energy Auditors will provide clients with information of any known risks. When deferral is necessary, subgrantees must provide information in writing describing the conditions that must be met for weatherization to commence.

OSHA and Crew Safety

Subgrantees shall comply with OSHA requirements for all weatherization activities. This includes the requirement that personnel working on the dwellings will utilize the appropriate personal safety equipment when necessary, and receive training on the use/location of safety equipment.

Related costs to train personnel in order to comply with OSHA requirements shall be charged to the Administration or the T&T/A budget category. Related costs to purchase equipment in order to comply with OSHA requirements shall be charged to the Administration or the Support budget category.

When contractors are employed by subgrantees, those contractors shall comply with OSHA requirements as well. Subgrantees that identify that a contractor may not be complying with OSHA requirements shall take all necessary steps to have the contractor rectify the situation, including notifying the contractor of the issue, identifying training opportunities, or terminating the contract with the contractor. Costs related to OSHA compliance for HVAC, weatherization, or other contractors hired to address H&S issues shall be part of the bid price or job cost.

The subgrantee is responsible for ensuring workers and subcontractors are properly trained and certified, when certification is required. Development will review the training certificates for OSHA and

LSW compliance in conjunction with the local subgrantee and the OWTC. The OSHA 10-hour training is required for all Retrofit Installers, Crew Leaders, Energy Auditors, QCIs, Heat Technicians, and recommended for all state licensed HVAC Installers.

Pests

Pest removal is allowed only where an infestation would prevent weatherization. Pest infestation where it cannot be reasonably removed or poses a H&S concern for subgrantee staff or contractors is cause for deferral. Pests include but are not limited to fleas, roaches, rodents, and/or bed bugs. Whole house extermination is not allowable.

It also is allowable for the subgrantee to address points of access to prevent intrusion. Examples include screening of attic gable vents to keep out flying insects and installing steel wool accesses to prevent rodents from penetrating.

Energy Auditors will assess the presence and degree of infestation and risk to workers.

Subgrantees must inform the client in writing of the observed conditions and associated risks. If deferral is necessary, subgrantees must provide information in writing describing the conditions that must be met in order for weatherization to commence.

Radon

Radon mitigation is not an allowable H&S cost. However, the cost to test a building for the presence of radon gas is allowable. All counties in Ohio have a moderate (24 pCi/L) to high (>4 pCi/L) potential for radon (see <https://www.epa.gov/radon/find-information-about-local-radon-zones-and-state-contact-information#radonmap> for a radon map of Ohio). Some precautionary measures (such as airtight sump covers) are allowable for installation and must be charged to the H&S budget category. Subgrantees must ensure every home in Ohio will receive the following measures (if applicable) to help reduce radon migration into the living area of the dwelling:

- Cover exposed earthen floors in basements and crawlspaces
- Seal and caulk penetrations, openings or cracks in below grade walls and floors that contact the ground
- Install an airtight sump cover in such a way that water can drain from above and below the sump cover
- Ensure floor drains have traps and traps are not dry

In instances where elevated levels of radon have been identified, the Energy Auditor will defer weatherization measures that could exacerbate the problem. Weatherization measures that are identified as being cost-effective for the dwelling and will reduce the exposure to radon are encouraged.

Each dwelling must receive a copy of the EPA's "A Citizen's Guide to Radon" and be informed of the related risks. Additionally, each client must sign the Radon Informed Consent form prior to receiving weatherization services. This form must be retained in the client's file.



Refrigerant

When a replacement refrigeration appliance is installed, the previous inefficient appliance must be removed and be properly destroyed. Contractors will properly dispose of these existing appliances and provide documentation of disposal. Appliances shall be recycled in accordance with the environmental standards in the Clean Air Act (1990), Section 608, as amended by the Final Rule. 40 CFR 82, May 14, 1993. Subgrantee staff, appliance vendor, manufacturing facility, or other entity that is used to recover the refrigerant from the old appliances must possess an EPA approved section 608 Type I license or an approved universal certification.

Smoke, Carbon Monoxide Alarms and Fire Extinguishers

A smoke alarm(s) must be installed in all dwellings without an operable alarm per manufacturer's instructions.

An approved carbon monoxide alarm(s) is required in every dwelling without an operable alarm, per ASHRAE 62.2 2016 guidance. The installation of smoke and carbon monoxide alarms must be charged to the H&S budget category. Combination smoke and carbon monoxide alarms are allowable.

The Energy Auditor and QCI will check existing alarms for operation and verify operation of installed alarms.

The client will be provided information on the operation of the alarms and any documentation included with the installation of new alarms.

Fire extinguishers are allowable for households when a solid fuel heating system is present (i.e. coal, wood). Only one unit may be installed into a home and must be charged to the H&S category. Fire extinguishers must be installed, according to the manufacturer's recommendations, be type ABC, UL listed, = 10 lb. and with a permanently affixed wall bracket to receive the extinguisher. The client must sign a written agreement to allow a fire extinguisher to be installed in the home and placed within sight of the solid fuel burning heat system when standing at the unit. The subgrantee must discuss and provide information on the use and upkeep of the extinguisher to the client.

Space Heaters Solid Fuel (Wood Stoves, Pellet Stoves, Fireplaces, etc.)

Wood, coal, and pellet fired furnace and boiler systems should be treated as vented heating systems.

The subgrantee must inspect the stove, chimney and flue. Combustion Appliance Zone (CAZ) depressurization testing is required per the NREL SWS and NFPA 211. Maintenance, repair, and replacement of primary indoor heating units is allowed where occupant H&S is a concern.

Subgrantees must install replacement primary heaters and/or flues according to applicable codes, standards and manufacturer's instructions. Adequate combustion air must be provided. Replacement of secondary heating units is not allowed.

Maintenance and repair of secondary heating units is allowed. Repair of flues and proper installation (e.g. protection of combustibles), is required for both primary and secondary solid fuel heating

appliances. The system must be operational and inspected using all test protocols, before any other weatherization begins.

Subgrantees must conduct pre- and post-weatherization worst-case CAZ depressurization testing in spaces having a fireplace. The depressurization limit is -5 Pa in a CAZ containing any woodburning combustion appliance, including fireplaces.

Fireplaces – Special Considerations

Fireplaces present special hazards that are affected by weatherization. If draft is poor, smoke may downdraft into the living space, causing poor indoor air quality. It is likely the occupants will ventilate in these situations.

Near the end of a wood fire, glowing coals will remain, radiating heat, while the draft lowers and allows the top of the chimney to cool, further reducing draft. The reduced oxygen available to the glowing coals causes production of carbon monoxide without the smoke that encourages space ventilation. This is a dangerous situation, as the carbon monoxide enters the living space due to the lowered draft.

For this reason, it is extremely important subgrantees make sure there is a carbon monoxide alarm installed in this CAZ and occupants are educated to the danger signs and what to do.

Worst-case CAZ depressurization testing will be conducted in spaces containing an operational fireplace. The worst-case depressurization of a space with a fireplace is -5 Pa.

Space Heaters, Vented Combustion (Natural Gas, Propane, or Oil)

These units will be treated as furnaces. The NREL SWS and State of Ohio Weatherization Field Guide for Home Energy Updates detail the diagnostic testing required during an inspection. The replacement system must be operational and inspected using all NREL SWS diagnostic test protocols, before any other weatherization begins.

Masonry Chimneys

Masonry chimneys used by vented space heaters, should be properly lined. When subgrantees install new equipment, it must meet local code requirements.

Masonry chimneys that have been retired (i.e. not being used by existing equipment) should be assessed for energy savings opportunities such as air sealing and capping to reduce thermal bypass.

Special Considerations Manufactured Homes

All fuel burning, heat producing appliances in manufactured homes, except ranges and ovens, are to be vented to the outside.

All fuel burning appliances in manufactured homes, except ranges, ovens, illuminating appliances, clothes dryers, solid fuel burning fireplaces and solid fuel burning stoves, must be installed to provide for the complete separation of the combustion system from the interior atmosphere of the

manufactured home (i.e., to draw their combustion air from outside).

Space Heaters, Unvented Gas and Liquid Fueled (Natural Gas, Propane, and Kerosene)

All unvented, fuel fired primary heating units or unvented fuel fired water heaters that cannot be vented must be removed and replaced with properly vented units before proceeding with any weatherization work. The replacement unit should be sized so it is capable of heating the entire dwelling unit, consistent with audit requirements described in 10 CFR 440.21(e)(2).

All unvented, secondary heating 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. Repair of secondary unvented heating units is not allowed. Secondary unvented heating units that meet the ANSI Z21.11.2, but are not operating safely, must be removed and properly disposed of.

Any unvented gas and liquid fueled space heaters that remain 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 shutoff 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 shutoff system; and
- The bedroom has adequate combustion air.

The subgrantee must notify the client/owner/authorized agent verbally and in writing of the potential health hazards of operating an unvented appliance in the post-weatherized dwelling, and provide information on safe alternatives. The subgrantee also must test the ambient air in the location of the unvented appliance.

Space Heaters, Standalone, Electric

Heating appliances in this category may be defined as heaters that do not have a permanent connection to electric power. Repair, replacement, or installation is not allowed. Removal is recommended. Circuitry must be inspected to ensure adequate power supply for existing space heaters. These heaters are not considered a primary heat source.

Client education must include information about the hazards associated with these types of heaters. Inspectors may defer if the client refuses to remove heaters of this type.

Spray Polyurethane Foam (SPF)

Subgrantees must use EPA recommendations (available online at <https://www.epa.gov/saferchoice/quick-safety-tips-spray-polyurethane-foam-users>) when working within the conditioned space of a dwelling unit when SPF fumes become evident within the conditioned space. Clients may be asked to relocate if and when fumes are evident in conditioned spaces. When working outside the building envelope, isolate the area where foam will be applied, take precautions so that fumes will not transfer to inside conditioned space, and exhaust fumes outside the home.

Testing will include checking for penetrations in the building envelope. Sensory inspection inside the home for fumes during foam application must also occur. Safety equipment associated with installation of this product may be charged to Equipment/Tools.

All weatherization staff and contractors using foam products must receive training on the proper use of these various products and understand the specification for each application type. Documentation is required of Retrofit Installers viewing an installation video or completing online training and verification of reading and understanding product use information. Documentation and verification of training must be maintained by the subgrantee. SDS are mandatory for any foam product used, and a thorough understanding of the temperature sensitivity of the product in use is required.

The client must be informed of plans to use two-part foam and the precautions that may be necessary.

Ventilation

The installation of new ventilation fans and related ducting, controls, and passive air intakes that are designed to remove moisture and/or introduce fresh air to assure a safe and healthy level of air exchange is allowable as a H&S measure. Ohio has adopted ASHRAE 62.2 2016. Ohio will utilize the 15 CFM de minimis as the action level where additional ventilation will be provided. The OWTC has developed an ASHRAE 62.2 2016 training.

The Energy Auditor and QCI will determine required ventilation and measure fan flow of existing and installed equipment to verify performance. The client must review and sign the ASHRAE 62.2 Notification Form and a copy must be maintained in the client file. Client refusal of mechanical ventilation, when evaluated and called for pursuant to the Standard, must result in deferral.

The client will be provided with information on function, use, and maintenance (including location of service switch and cleaning instructions) of ventilation system and components by the subgrantee. The subgrantee must also provide the client with equipment manuals for installed equipment.

Window and Door Replacement, Window Guards

Replacement, or installation of windows or doors is not an allowable H&S cost, but may be allowed as an ECM or IRM when meeting the definition and requirements of ECMs and IRMs. Window and door repairs are allowable as a H&S measure if it resolves a bulk water intrusion issue that is the cause of visible biological growth, is well documented with written explanation and photos of the biological growth, in the client file. If disturbing LBP, subgrantees and all contractors must follow LSW and LRRP practices and the client must be informed of the risks of LBP.



If a situation arises that is not specifically addressed in the H&S plan a decision will be made on a case-by case basis. The subgrantee must submit to their technical monitor the necessity of the measure, cost justification, and photo documentation (if applicable). The technical monitor will review the information and respond to the subgrantee in writing within five business days.

V.8 Program Management

V.8.1 Overview and Organization

Grantee Organization

The weatherization program is administered by the Development, CSD, OCA. The OCA also administers the federal LIHEAP, the Community Services Block Grant, and the State Energy Plan. OCA also administers the state funded Percentage of Income Payment Plan Plus, and the Electric Partnership Program.

The HWAP is directly administered by the Manager, Energy Efficiency Programs, OCA. An additional seven staff positions are dedicated to monitoring and compliance. Development has 25 direct contracts with subgrantees (Community Action Agencies (CAAs) (18) ; local government agencies (2); and nonprofit, non-CAA agencies (5)) to implement the HWAP. These subgrantees will ensure that HWAP services are available in all 88 of Ohio's counties. Subgrantees are solely responsible for the quality of work and reporting requirements of the HWAP. Subgrantees are expected to monitor the performance of contractors, crews, and nonprofit partners carrying out work for the HWAP. Additionally, Development monitors will visit all subgrantees and review no less than five (5) percent of completed units (see V.8.3 Monitoring Activities for additional details).

Traditionally, 15 percent of LIHEAP funds for Ohio are transferred annually to the HWAP. These funds follow the same rules of the DOE weatherization program, with a few exceptions based on program funding needs. The flexibility provided by these funds prevents many deferrals for Ohio clients and is vital to the continuation of a successful program. In Program Years 2018 and 2019 the LIHEAP program transferred a total of 20 percent of funds for weatherization. Fifteen percent of funds were combined with the HWAP grant agreement, and the remaining 5 percent was allocated to HWAP subgrantees as a separate grant agreement. Beginning in Program Year 2021, Development will seek a waiver request from HHS to allow 25 percent of the state's LIHEAP funds to be utilized towards the weatherization program. The additional 5 percent, and then anticipated 10 percent in Program Year 2021, are used by HWAP subgrantees to offset costs of the HWAP and provide funding for H&S related measures such as knob and tube wire replacement, minor roof repair and ventilation measures. This is to achieve the ultimate goal of reducing the number of deferrals in Ohio.

Relationship of the Weatherization office with other units of State Government

The Deputy Chief of the OCA reports to the Assistant Chief of the CSD, who also oversees the Deputy Chief of the Office of Community Development (OCD). The OCD includes among its programs housing repair programs such as CHIP and the Housing Assistance Grant Program.

V. 8.2 Administrative Expenditure Limits

Development will follow the rules for administrative expenditure limits outlined in 10 CFR 440.18(e),

which state that not more than ten (10) percent of any grant made to a state may be used by the grantee and subgrantees for administrative purposes in carrying out duties under this part, except that not more than five (5) percent may be used by the State for such purposes, and not less than 5 percent must be made available to subgrantees by states. Ohio tracks administrative expenditures on the monthly financial reimbursement request. Also, Ohio's grants management and database software, OCEAN, prevents budgeting greater than the maximum allowable in the administration category for subgrantees.

For subgrantees, "administrative costs" shall be defined as those costs which a subgrantee incurs that are not in direct support of individual weatherization projects but are necessary for the organization to operate the HWAP. Typical expenditures found in this category are wages, fringe benefits and related costs associated with the following functions: executive (not directly installing or supervising the installation of materials), finance/accounting, human resources, and planning. Other typical administration cost category expenditures are payroll processing costs, costs to administer health insurance programs, data processing costs, indirect costs as allowable, and bank service fees. Membership dues are considered administrative costs and not more than 25 percent of the cost of any membership may be charged to HWAP.

"Indirect costs" will be an allowable expenditure only when written approval of the indirect cost rate has been obtained by the subgrantee from the subgrantee's cognizant federal agency. Indirect costs are considered Administrative costs. Audit and liability insurance costs may be prorated and included in separate respective cost categories only when not included in the indirect cost rate agreement.

V.8.3 Monitoring Activities

Monitoring Activities

Staff Dedicated to Monitoring

Development employs seven (7) monitoring staff persons (salaries paid by DOE T&T/A and HHS/LIHEAP funds – see budget justification for details). Ohio has allocated 35 percent of DOE T&T/A funds to support monitoring activities.

- Energy Developer (Lead Technical Monitor QCI)
- Energy Analysts 2 (Technical Monitors QCI)
- Community Development Analysts (Administrative Monitors)

Summary Programmatic and Fiscal Monitoring

Development has an established monitoring system for evaluating subgrantee performance regardless of funding source. Monitoring functions will be the State's principal method for determining subgrantee compliance, evaluating actual accomplishments against planned activities, and determining the effectiveness of the program. Salaries for state monitors and the program manager are charged to the DOE T&T/A category.

Monitoring provides objective reporting to and from subgrantees and makes recommendations to address program and administrative deficiencies and needs. The administrative field staff will review fiscal procedures, staffing and organization, procurement, and client services. The technical field staff will review property management, training records, inventory, materials quality, and field work. Each



subgrantee will be visited by a technical field representative at least once per monitoring year to review no less than 5 percent of completed units. Each subgrantee will be visited by an administrative field representative at least once every monitoring year to review no less than five (5) percent of the completed unit files. Program Year is defined as July 1 through June 30.

Monitoring visits are generally arranged with subgrantees at least two (2) weeks in advance. Subgrantees are not permitted to choose the units for monitoring. Units are chosen by state monitoring staff, based on noted anomalies or risk factors identified in previous onsite monitoring or desk monitoring, housing types, measures installed, and location. No specific monitoring schedule is set for Program Year 2020 at this time. In general, monitors visit one (1) to four (4) subgrantees per month to perform monitoring and/or T&T/A. There are currently 25 subgrantees in Ohio.

A job automatically fails the visit if the client confirms the subgrantee came to monitor the unit itself in an effort to “clean up” the job prior to the state monitoring visit.

Travel is necessary to complete the demands of the monitoring approach, and federal travel rules are followed by the State of Ohio. State owned vehicles are generally used for in-state travel unless not available or not cost effective. All technical monitors performing Quality Control Inspections are required to maintain the BPI QCI credential.

Corrective Actions Procedures

Ohio's monitoring approach will include the following components:

- Administrative review by field staff of documents and reports related to the organization, operation and performance of local subgrantees' programs
- Monitoring for technical compliance with standards, performance measures, applicable codes, and other policies related to installation of materials; and
- Fiscal Audit of financial stability and accountability.

Administrative Monitoring

The administrative review covers the following, at a minimum: financial management systems and operations, review of previous monitoring visits, payroll/personnel, procurement procedures, subgrantee or partner agency monitoring, invoicing/purchase orders compared to work orders and price list or bids, records retention, contractor compliance, client file review, program structure, marketing, general program operations and flow of services, review of production goals, information technology needs assessment, and gathering of success stories. Reports are sent to the subgrantee Board Chairperson and Executive Director, who must respond within 30 days of receipt of the report and provide evidence or assurance, as appropriate, of all actions taken. A 15-day extension for the response is allowable with permission from the Manager of the Energy Efficiency Programs within Development.

The administrative monitoring also includes review of annual grant applications, reports based on monthly financial and production information, and compliance with required written procedures. Problems noted through this review are communicated to the subgrantees for their subsequent explanation and/or resolution. Client files have been standardized in Ohio since 2010. Administrative monitors also check for adherence to both existing and new policies and procedures, and provide

training upon request or requirement when subgrantees fail to meet expectations in one or more area. The Administrative Monitoring Quality Assurance Checklist for file review is attached, along with a copy of the monitoring instrument.

Technical Monitoring

Technical monitoring reports are completed within 30 days of the visit to the subgrantee. These reports will summarize the findings and, when necessary, direct the subgrantee to take specific actions to correct issues of noncompliance and/or to develop a plan of action to improve performance. Reports are sent to the subgrantee Board Chairperson and Executive Director who must respond within 30 days of receipt of the report and provide evidence or assurance, as appropriate, of all actions taken. A 15-day extension for the response is allowable with permission from the Manager, Energy Efficiency Programs, of Development. Monitoring reports include a reminder that suspension of funding is possible if a subgrantee fails to respond within the allowable timeframe. Technical monitoring also includes review of annual grant applications, analysis of tools/equipment inventories, and compliance with required written procedures.

Development has developed and implemented procedures to ensure state monitoring is increased if a subgrantee's pass rate for all monitored units on a single visit falls below the established acceptable pass rate of 60 percent. Based on the monitoring reports, any subgrantee falling below the visit pass rate of 60 percent any time during the program year will receive additional technical monitoring of its completed units for the next two (2) consecutive quarters. A minimum of three (3) completed units will be monitored during each of these follow up visits. During the period in which the subgrantee pass rate is below 60 percent, Development will work with that subgrantee with T&T/A and/or the OWTC to address the problematic areas causing the low passage rate. Under this process, units pass or fail based on specific parameters. Units monitored that have one or more H&S findings (any H&S finding is considered a major finding) or a combination of four or more minor or moderate findings, fail the job. More than 60 percent of units monitored at an onsite visit must pass. Subgrantees who do not meet this requirement are placed in a CIP and are visited quarterly by state monitoring staff. These visits may be regular monitoring visits to check progress or to provide T&T/A to the program. The subgrantee is placed in a CIP until at least 60 percent of units pass the monitoring during two (2) consecutive technical monitoring visits. Any findings are documented in the site monitoring checklist and detailed in a written report to the subgrantee.

Audit

Development's Audit Office reviews compliance with federal, state and local rules, regulations, laws and policies related to the receipt, expenditure, and reporting of grants. An audit is conducted in accordance with procedures prescribed by Development, to satisfy federal and state subgrantee monitoring requirements and those expressed or implied in grant agreements. Audits are reviewed, and results are incorporated into the weatherization risk assessment of each subgrantee.

Subgrantees that exhibit significant problems, actions or circumstances that increases the risk of fraud, waste and abuse of grant funds, are subject to additional Development review. Specific audit procedures would be performed at the request of Development.

An audit report is issued by Development's Audit Office within 30 days after the last day of audit fieldwork. The subgrantee must respond to any questioned costs, legal compliance findings or

material weaknesses stated in the report. Each response must describe the actions the subgrantee has taken, or will take, to preclude the findings from reoccurring. Unresolved findings could result in disallowed costs, withholding of funds, suspension of funds, or other legal actions.

Tracking and Analysis

Ohio uses Montrak, an Excel based worksheet, to track monitoring results, including dates for the visit, issuance of the report, and final resolution. Ohio also maintains a database that tracks and consolidates findings on technical visits by measure and type. Reports show both individual subgrantee and statewide results, which are shared with the OWTC to guide T&T/A.

T&T/A is provided by the OWTC for formal, required courses, and by state technical and administrative staff, when identified by need. Triggers for T&T/A include reports by Development, DOE, or another oversight group; request by the subgrantee; or requirement for additional training. The OWTC maintains a database of trained staff and the details of training completed and status (pass, fail, in progress, etc.). Subgrantees are responsible for tracking the credentials and training needs of their personnel and maintaining appropriate certifications. State monitors have access to the training database and check credentials of the personnel at subgrantees they monitor. Development requires updated training in the monitoring report when compliance issues are found.

Client education is required for every eligible household. Subgrantees submit, each year with their Grant Management Plan, a list of trained staff persons who have completed the Client Education course offered by the OWTC, and date the course was completed. Client education is recorded on the Energy Savers Partnership Plan form, with one copy in the client file and the other copy staying in the home with the client for future reference.

Removal of Subgrantee

Ohio completes an annual risk assessment of subgrantees to evaluate performance and to determine if a subgrantee is administering an effective weatherization program. The Risk Assessment tool evaluates subgrantees based on administrative, technical and fiscal management. A rating of "high risk" for two consecutive years on the annual Risk Assessment performed by Development may result in a competitive proposal process for a subgrantee's territory, after the current contract expires.

Should the Risk Assessment rating result in a competitive proposal process for any subgrantee's territory, Ohio will proceed in accordance with 10 CFR 440.15. Additionally, the grant agreement with local subgrantees includes the following language regarding termination:

1. Effects of Termination. *i) Procedure for Termination. If Grantor determines as provided in this Section 15 to terminate this Agreement, Grantor shall provide a written Notification of Intent to Terminate to the governing board of Grantee by certified mail. The Notification of Intent to Terminate shall identify in sufficient detail the charges for such proposed action, the sections of statutes, rules, regulations or contractual obligations that Grantee is charged with violating; and a statement of Grantee's right to request a public hearing on the proposed termination by making a written request within 30 days of the date of the mailing of the Notification of Intent to Terminate. Such notice shall also inform Grantee that Grantee may be represented by an attorney or by such other representative as designated by a majority of the governing body of Grantee. When any Notification of Intent to Terminate sent by certified mail is returned because of inability to deliver, the notice required shall be sent by ordinary mail evidenced by a certificate of mailing to the chairperson of Grantee. Grantor may*

terminate this Agreement in whole (“Complete Termination”) or in part (“Partial Termination”) pursuant to Ohio Administrative Code Rules 122:12, and cease payment accordingly. In the event of Partial Termination, Grantor and Grantee shall enter into an “Amended Grant Agreement” reflecting a revised Project. ii) Termination. In the event of Termination of this Agreement, all property and finished or unfinished documents, data, studies and reports purchased or prepared by Grantee under this Agreement shall be disposed of according to Grantor’s directives, and Grantee shall be entitled to compensation for any unreimbursed expenses reasonably and necessarily incurred in the satisfactory performance of this Agreement. Grantee shall incur no new obligations after the date of the termination of this Agreement and shall cancel as many outstanding obligations as possible. Within 60 days after Termination of this Agreement, Grantee shall provide Grantor with a Closeout Report setting forth the total expenditure of the Grant Funds by Grantee and the status of the Project at the time of termination. Upon review of the Closeout Report, Grantor shall determine whether or not Grantee shall be required to refund any portion of the Grant Funds. The refund decision will be within the sole discretion of Grantor. In no event shall Grantee be required to refund an amount in excess of the total Grant Funds awarded under this Agreement as a result of any breach of this Agreement. iii) Effect of Termination. Notwithstanding any of the provisions of this section, Grantee shall not be relieved of its responsibility for damages sustained by Grantor by virtue of any breach of contract by Grantee, and Grantor may withhold any reimbursement to the Grantee for the purpose of setoff until such time as the exact amount of damages due Grantor from Grantee is agreed upon or otherwise determined.

Existing subgrantees also may elect to voluntarily relinquish the weatherization program. This must be completed in writing and signed by an authorized representative of the subgrantee. This also would necessitate a competitive process to reassign the territory through a request for proposal. A public hearing is required when a new permanent subgrantee is announced. In any case when the territory is relinquished by a subgrantee or a subgrantee is removed, existing subgrantee(s) may be requested to act as a temporary emergency subgrantee in order to ensure continuation of services without interruption to eligible clients.

V.8.4 Training and Technical Assistance Approach and Activities

Ohio’s weatherization network receives Tier 1 and Tier 2 training from the OWTC. The OWTC is accredited by the Interstate Renewable Energy Council (IREC) to train Home Energy Professionals for the Retrofit Installer, Crew Leader, Energy Auditor, and QCI certifications. Additionally, all curriculums for the Retrofit Installer, Crew Leader, Energy Auditor, and QCI have been aligned with the Job Task Analysis (JTA) for each certification. Requirements for training and certification are developed in accordance with DOE Weatherization Assistance Program (WAP) guidelines and regulations and those of the NREL SWS, and the State of Ohio Weatherization Field Guide for Home Energy Updates. The OWTC received IREC accreditation for Retrofit Installer, Crew Leader and Energy Auditor in September 2016. The attached 2020 HWAP Training and Certification Requirements contains the course list for each weatherization position, and how they are integrated to provide a consistent training message that meets the JTA requirements.

All Energy Auditors and QCIs must attend and successfully pass a three-day inspector refresher course at the OWTC every three (3) years. All Crew Leaders must attend and successfully pass a refresher course every three (3) years. Development encourages all weatherization staff to attend job specific trainings and conferences (including Ohio’s annual weatherization conference), to learn new skills and techniques to enhance Ohio’s weatherization program. Development regularly reviews monitoring reports to determine if individuals require any additional training



Training and certification requirements are reviewed on an annual basis by state technical and administrative staff in collaboration with the training and technical staff at the OWTC. The OWTC works to ensure that the training and technical requirements meet or exceed program standards as well as support quality outcomes including, but not limited to, a skilled, knowledgeable and qualified workforce, which translates to quality work standards in the field. Contractors are required to complete applicable trainings prior to starting work and are not charged for the cost of registration for any courses required for Ohio's weatherization program. Per diem and other costs are the responsibility of the contractor. Local subgrantees are advised to secure a retention agreement in exchange for the training, that would stipulate that contractors will work in the program, at a minimum, for a specific amount of time, and should be in correlation to the cost of the training provided.

Monitors check training databases to ensure that all staff are up to date on required training. Findings are recorded in monitoring reports and subgrantees are required to respond.

New weatherization contractors must complete required training prior to the start of work (Combustion for Contractors, Basic Weatherization Tactics, and LRRP). All other training may be completed within 180 days of the date of hire or contract signature, unless otherwise specified.

All new staff (agency or contractor) must complete required training (Basic Weatherization Tactics, and LRRP) within 180 days of the date of hire.

New HVAC contractors must complete Combustion for Contractors training prior to the start of work.

For a complete list of trainings in the Retrofit Installer Series, Crew Leader Series, Energy Auditor Series, QCI Series, and Heat Technician Series, see the HWAP Program Year 2020 Training and Certification Requirements (attached).

Infield technical assistance is provided to subgrantees through a variety of means from both Development and the OWTC. A referral for T&T/A can be initiated through a variety of means including, but not limited to:

- Results of an onsite monitoring visit or report by Development, DOE, or other oversight or evaluation entity;
- Request by the subgrantee;
- Supplemental training required by Development or recommended by the OWTC.

The OWTC maintains a training database for all workforce/personnel employed or previously employed by a subgrantee or approved private contractor. The database has the capacity to track student progress in detail, including student transcript of credentials, course completions, pass/fail valuations, and related certifications. While subgrantees are responsible for maintaining training and certification compliance for their workforce/personnel, the OWTC student database has limited capacity to support notification to subgrantees of pending recertification and/or training, to avoid noncompliance in training and technical requirements. Development monitoring staff has access to the OWTC database to validate credentials of the subgrantee personnel or request a report directly from the OWTC. Through continued collaboration, the OWTC and Development ensure that subgrantees remain in compliance in training and technical requirements and related certifications.

Client education is required for all eligible households and is recorded on the Energy Savers



Partnership Plan form or equivalent. One (1) copy is placed in the client file and the other copy remains with the client for future reference. All Energy Auditors and QCIs are required to complete an eight-hour client education training through the OWTC to develop skills for client interaction and to explain the changes in the home, post-weatherization.

A. ASSESSMENT OF TRAINING AND TECHNICAL ASSISTANCE

Development staff analyze data on a variety of financial, production, and weatherization retrofit information. Trends indicating extremes in production and/or completed weatherization measures will be noted and tracked for appropriate follow up. The field representatives' monitoring reports are shared with the OWTC so trainings can be modified or customized based on needs. Additionally, the State maintains reports, including the report of Air Leakage Reduction by subgrantee that tracks the percentage of homes meeting the minimum reduction. This information is used to compare subgrantee effectiveness and direct training.

Onsite visits provide firsthand, observable evidence for T&T/A.

State funded weatherization skills training will be matched closely to techniques and program policies to ensure consistent and effective implementation. A Training and Student Database with a master list of all HWAP staff and their associated training records, has been developed to highlight the needs of the individuals working within the program.

B. PROVISION OF TRAINING AND TECHNICAL ASSISTANCE

The OWTC is an IREC accredited training provider. The OWTC provides a multifaceted approach to workforce training and development. Classroom instruction, written and visual materials, hands on instruction, and field experience provide a wide range of options to accommodate varied learning styles for adult learners.

Funding for training activities provided through the OWTC is part of the T&T/A allocation to the State of Ohio. Annual funding of the OWTC is determined at the time of the DOE allocation. The OWTC has established training facilities at locations regionally in Ohio ensure that travel costs are minimized to subgrantees and approved private contractors. In addition to the funding from the DOE WAP allocation, the OWTC has diversified its funding revenue through procurement of federal, state, and private foundation grants and private contracts with contractors and utility providers. This diversification of funding streams has allowed the OWTC to bring additional training and technical resources to the Ohio WAP Provider Network.

The training schedule is updated on a quarterly basis and made available to the Ohio WAP Provider Network online through the training center's website at www.coadinc.org/owtc.

The OWTC has more than 30 years of experience in the development and implementation of weatherization training standards at both the state and federal level.

The OWTC staff participates in working advisory groups with Development to update technical standards and refine curriculum. The OWTC is responsible for creating training materials including technical documents, technical drawings and charts, instructor and student manuals, and digital media presentations. The training professionals also design and build the props and learning tools for specific hands on instruction. An example of this would be the full size, fully functional "prop house"

within the main facility allowing simulated diagnostic testing and hands on training to be conducted in a controlled environment.

Courses in building science, retrofit energy efficiency measures, heating unit inspection, heating unit repair, and lead safety are provided with H&S training integrated into each module. Each of the training professionals on staff are required to become BPI certified in Analyst and Envelope Professional, and several hold additional certifications, including BPI Proctor status.

The feedback from various oversight entities at all levels, including but not limited to inspector general reports, federal and state monitoring, and federal and state audits, are used to develop or modify current policies and to direct program T&T/A.

Training and certification requirements are provided by the OWTC and include the competencies, knowledge, skills, and abilities for a skilled workforce necessary to perform quality work in the field as described in the JTA identified by NREL.

Continuing Education Units (CEUs) will be made available to subgrantees and workforce to ensure knowledge, skills, abilities and technical competencies remain current. Courses offered, reflect a commitment to ongoing education and skill building, as well as provide opportunities to have access to new technologies and technical advances in theory, lab, and field practice. The continued expansion of available CEUs supports the workforce in holding other credentials in the industry that support higher outcomes in the field.

T&T/A funds are available to support locally initiated training and to make effective use of the training center. To assure coordination of training activities, all T&T/A funds shall be itemized and budgeted into the following categories:

- Costs for travel and per diem for attendance at the OWTC for T&T/A workshops, seminars, meetings, or classes.
- Supplemental training not offered by the OWTC for HWAP staff. Training must relate directly to the attendee's HWAP job duties.
- Purchase of training materials, including training and testing costs, necessary to meet OSHA safety standards.
- Percentage of salary for a staff person responsible for ensuring that training, safety requirements and needs are met, and to oversee in-house weatherization training.
- Travel for HWAP staff to attend conferences, meetings, and seminars.

Development shall continue to assure an effective exchange of program information through the following:

- Active involvement with the HWAP PAC and Technical Subcommittee;
- Promotion of regional meetings initiated by Regional Representatives of the PAC at which management, technical and general informational topics will be discussed according to current need;
- Scheduling statewide weatherization meetings;
- Updates to program management guidance, including Operations Memos, Information Updates and revisions to the HWAP Policies and Procedures Manual, when necessary;
- Continued meeting of the working group consisting of Development and OWTC staff, to develop new training approaches and refine the existing courses to best meets the needs of

the network; and

- Encouragement of information exchange and skills transfer among subgrantees on an informal basis.

Additionally, appropriate representation is recommended at national conferences and DOE sponsored events such as Home Performance Coalition, the National Weatherization Conference, National Association for State Community Service Programs conferences, Energy Out West, and/or other regional meetings.

C. ATTENDANCE/TRAINING REQUIREMENTS

Attendance at state sponsored trainings may be required based on identified need to support remediation of program deficiencies and/or to ensure competence in specific areas. In such cases, subgrantee attendance will be required as a matter of program compliance. Failure to attend any scheduled training without due notice may result in a service charge to the subgrantee, per the cancellation policy of the OWTC. This service charge is not an allowable T&T/A expense and must be paid by unrestricted/nonfederal funds.

T&T/A funds may be used a maximum of three (3) times for QCI certification exam process (written and/or field).

D. ASSESSMENT OF STATE TRAINING AND TECHNICAL ASSISTANCE ACTIVITIES

Assessment of activities will be accomplished by review of the following:

- Local training activities and local T&T/A expenditure reports;
- The OWTC monthly attendance and quarterly activity reports;
- Quarterly review of the OWTC to measure and track training effectiveness;
- Onsite monitoring of local programs;
- Review of local T&T/A curriculum and activities.

All attendees receive a certificate for successfully completing each course, showing milestones met in their professional development plan, which are maintained by subgrantees and reviewed by state monitors upon request. Feedback from subgrantees is used to direct training and policy, and all monitoring reports are shared with the OWTC staff. Additionally, a work group has been formed that meets quarterly to discuss training issues and requirements and to direct and improve the process of training our weatherization network. By doing so, subgrantees are compared for effectiveness in energy efficiency. Ohio will continue to improve operations, provide effective services, and develop new ways to excel at training the network of providers and weatherizing homes.

The OWTC will track and report to the Manager, Energy Efficiency Programs, of Development on a quarterly basis, the following performance metrics:

- Number of individuals on a waiting list
- Courses provided
- In the field technical assistance
- Expansion of training portfolio/CEUs

V.9 Energy Crisis and Disaster Plan

Ohio's ability to leverage additional funds has allowed most subgrantees to meet the emergency demands of their clients without significant changes to the annual plans. In the event of a declared natural or manmade disaster, Ohio will allow subgrantees to assist their eligible clients with weatherization funds to the extent that the services are in support of eligible weatherization work. The allowable expenditures under the HWAP are limited to include the following:

- The cost of Incidental/Additional Repairs to an eligible dwelling unit, if such repairs are necessary to make the installation of weatherization materials effective, per 10 CFR 440.18(d)(9);
- The cost of eliminating H&S hazards, which is necessary before the installation of weatherization materials, per 10 CFR 440.18(d) (15).

In the event of a declared federal or state disaster (those in which the President of the United States or the Governor of the State of Ohio has declared the event an emergency), subgrantees may return to a dwelling unit previously reported as a completion to the DOE that has been "damaged by fire, flood, or act of God and repair of the damage to weatherization materials is not paid for by insurance" and it may be re-weatherized, without regard to date of previous weatherization, per 10 CFR 440.18(f)(2)(ii). Local authorities must deem the dwelling unit salvageable as well as habitable and the damage to the materials must not be covered by insurance or other form of compensation. In these cases, the work can be addressed without prior approval or any special reporting.

The subgrantee may use HWAP funds to perform functions to protect the federal funding investment. Such activities may include: securing weatherization materials, tools, equipment, weatherization vehicles, or protection of local subgrantee weatherization files and records during the initial phase of the disaster response. The use of HWAP funds to pay weatherization personnel to perform relief work in the community as a result of a disaster is not allowable. The use of weatherization vehicles and/or equipment may be used to assist disaster relief activities; however, the HWAP must be reimbursed. Reprioritization of households located in a disaster area is permissible as long as the households are determined eligible for the weatherization, meet one of the priorities described in 10 CFR 440.16(b), and are free and clear of any insurance claim or other form of compensation resulting from the damage incurred from the disaster. Documentation must be placed in the client file.