

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
STATE PLAN/MASTER FILE WORKSHEET

(Grant Number: EE0006152, State: IN, Program Year: 2013)

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

V.1 Eligibility

V.1.1 Approach to Determining Client Eligibility

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

Per WPN 09-5, households with an income at or below 200% of the OMB poverty income guidelines are eligible to receive weatherization work, as authorized by the American Recovery and Reinvestment Act of 2009, Public Law 111-005, and appearing in Section 412(7) of the Energy Conservation and Production Act (42 U.S.C. 6862(7)).

Describe what household Eligibility basis will be used in the Program

IHCDA will continue to use Energy Assistance Program (EAP) applications to verify the income of clients between 0% and 150% of poverty. Clients between 151% and 200% of poverty are subject to the Indiana LIHEAP program's method for calculating income and supplying all related income verification documentation. Sub grantees can add clients between 151% and 200% of poverty to their wait list via one of the following ways:

Through disqualified EAP applications that are below the 200% of poverty threshold, where an income verification was done by a sub-grantee; or,

- Using a separate, sub-grantee determined method that aligns with EAP income verification guidelines.

In this case, all income verification documents must be kept in the client's file.

An application and eligibility determination are not required for shelters.

Definition of children: Below age 18

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

Indiana's Weatherization Assistance Program will follow the same procedures outlined within Indiana's LIHEAP EAP Program Operations Manual. Indiana's approach to ensuring qualified aliens are eligible for weatherization benefits is as follows:

SECTION 300

ELIGIBILITY AND INCOME STANDARDS

301 RESIDENCY AND CITIZENSHIP REQUIREMENT

The applicant must reside in the State of Indiana at the time of application and for at least one (1) month of the current heating or moratorium season (December 1 through March 15) to be eligible for the Energy Assistance Program.

Current verification of residency and service address must be verified at each application and reapplication for benefits. These two addresses must match to qualify for benefits.

Possible verification sources are as follows (not all inclusive):

- Valid Indiana Driver's License with current address
- Rental/Lease agreement listing the applicant's name and current residence
- Completed Landlord Affidavit form (if applicable)
- Employer's statement or pay stub listing residence address

In addition to the above criteria, all members of the household must be United States (U.S.) citizens, U.S. Nationals or qualified aliens.

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A United States citizen is someone born in:

- One of the 50 states
- The District of Columbia
- Puerto Rico
- Guam
- The Virgin Islands
- The Northern Mariana Islands

A United States National is someone born in:

- America Samoa
- Swain's Island

To verify a household member is a U.S. Citizen or National, use any of the following documents:

- Birth Certificate
- U.S. Passport
- Report of Birth Abroad of a Citizen of the U.S. (FS-240) issued by the Dept. of State
- Certification of Birth (FS-545) issued by a Foreign Service post
- U.S. Citizens I.D. card (I-197) issued by the Bureau of Citizenship and Immigration Services (BCIS)
- Certificate of Naturalization (N-550 or N-570) issued by BCIS
- Certificate of Citizenship (N-560 or N-561) issued by BCIS
- Northern Marianas I.D. card (I-873) issued by BCIS
- Statement provided by the U.S. consular official certifying the individual is a citizen.

There are secondary sources of verification which may include religious records, U.S. civil service employment records dated before June 1, 1976, early school records, census records, adoption papers, and any other document establishing or denoting a place of birth.

Non-citizens must provide documentation verifying Resident Alien status to be eligible for EAP benefits. The federal government considers the following to be qualified aliens:

- An alien legally admitted for Permanent Resident Alien Status. I 151, commonly referred to as "green card".
- An alien granted asylum. Documentation: I 94 or INS letter
- A refugee admitted to the United States. Documentation: I 94 "Arrival Departure Record".
- An alien paroled in the United States. Documentation: I 94 "Arrival Departure Record".
- An alien whose departure is being withheld. Documentation: I 94 and/or order from an immigration court judge.
- An alien granted conditional entry. Documentation: I 94 "Arrival Departure Record".
- An alien who is a Cuban/Haitian entrant. Documentation: I 151 "green card".

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- An alien who is a battered spouse or child. Documentation: 1) Veteran proof of legal entrance in U.S. ~~2014~~ or proof of active military service, birth/marriage certificate; 2) Other-Approval Notice of "Notice of Prima Facie Case" under the 1994 Violence Against Women Act (VAWA).

301.1 Social Security

A Social Security number (SSN) is required for all persons in the household age 1 and older. If not provided, the household is ineligible for assistance.

A SSN can be verified by viewing the SS card, another federal form, pay stub, SSA benefit letter or other acceptable proof. An intentionally invalid SSN entry is unacceptable.

An agency should assist applicants to apply for social security numbers.

The web site for the SSN application form and instructions for applying for a new social security number can be found at:

<http://www.ssa.gov/online/forms.html> (Form SS-5 Application for a Social Security Card).

When a household member exists and cannot provide the intake worker with an SSN at time of application: Enter the household member, fill the space with nines or zeros, and leave the application in pending status until the SSN is verified.

However, after 30 days of application, if the household has not provided SSNs for all eligible adult household members, a denial letter should be generated. The entire household is ineligible for Energy Assistance if any member fails or refuses to provide or verify their SSN or provide proof of application for a SSN.

Individual Tax Identification Numbers (ITIN) numbers cannot be used in lieu of a social security number.

According to the Social Security Administration, noncitizens may apply for a Social Security number if they have permission to work in the United States by the Department of Homeland Security.

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

IHCDA will continue to use Energy Assistance Program (EAP) applications to verify the income of clients between 0% and 150% of poverty. Clients between 151% and 200% of poverty will still be subject to the Indiana LIHEAP program's method for calculating income and supplying all related income verification documentation.

Sub-grantees can add clients between 151% and 200% of poverty to their wait list via one of the following ways:

1. Through disqualified EAP applications that are below the 200% of poverty threshold, where an income verification was done by a Community Action Agency; or,
2. Using a separate, sub-grantee determined method that aligns with EAP income verification guidelines. In this case, all income verification documents must be kept in the client's file.

An application and eligibility determination are not required for shelters.

Describe Reweathering compliance

Sub-grantees may provide services to a dwelling unit previously weatherized **prior to September 30, 1994**, as noted in the American Reinvestment and Recovery Act of 2009 and WPN 13-1, section V.1.2. A "Reweatherized" unit falls into the category of time indicated above and described under 20CFR 440.18(e)(2)(iii). DOE gives sub-grantees the flexibility to revisit those homes weatherized prior to September 30, 1994 that may not have received the full complement of Weatherization services. Any unit reweatherized must be recorded in IWAP under reweatherization.

Prior to any weatherization activity, a unit must be evaluated to determine whether previous weatherization services were provided after **September 30, 1994**. If services have been provided *after this date* with Department of Energy federal grant funds, the unit is not eligible for additional weatherization services.

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The following actions must be taken on each unit prior to weatherization services to ensure that homes that have received weatherization services after September 30, 1994 are not re-weatherized:

1. Each client's address must be entered into IWAP to identify whether the client's home has been weatherized during or after 2000 (length of IWAP historical records);
2. Each client must be asked whether their home has been weatherized after September 30, 1994; and
3. A visual inspection of each home must be performed by an auditor to identify whether previous weatherization measures have been performed.

If there are no documented, verbal, visual, or physical evidence of previous weatherization services, the Sub-grantee may proceed with weatherization services on the unit.

Describe what structures are eligible for weatherization

Indiana's sub-grantees may Weatherize single site built, mobile homes (manufactured housing), shelters and multi-unit dwellings. Indiana's sub-grantees may also Weatherize dwellings for both homeowners and renters. The selection process is based upon client eligibility, established priority guidelines, and information gathered during the initial audit. Dwelling eligibility is outlined within Indiana's Weatherization Field Guide and Indiana's Weatherization Policy and Procedures Manual and within this DOE Master Plan.

Once a dwelling is determined to qualify for services, it is up to the Energy Auditor to determine if the dwelling is a candidate to receive weatherization services or if the dwelling should be deferred.

Please reference V.3 Priorities, Deferral Process, Rental/Multi Family, Audit Procedures and Client Eligibility descriptions within this Master Plan.

For additional information regarding Indiana's processes for determining structure eligibility, please reference Chapter 1, Wx Process, in the Indiana Weatherization Field Guide.

Describe how Rental Units/Multifamily Buildings will be addressed

Indiana addresses multi-unit buildings in the following manner:

1. Multi-Unit Buildings – In the weatherization of multi-unit buildings, DOE regulations require that 66% (50% for duplexes and four unit buildings) of dwelling units in the building must be eligible households or will become eligible within 180 days as referenced in 10 CFR 440.22(b).

An application and eligibility determination are, therefore, not required for non-eligible or empty units.

For IWAP reporting purposes, each non-eligible or empty unit should be counted as "Data Unavailable" when reporting income categories and demographics. The box "Demographics Not Available" must be checked at the bottom of the IWAP application page.

For reporting purposes, each non-eligible or empty unit should be listed as "Data Unavailable" when reporting income categories and demographics. To ensure that the percentage requirement is met, a separate list must be maintained, indicating the eligible and non-eligible or empty units.

Sub-grantees should also note that when weatherizing multi-unit building, the amount to be spent on the building is determined by the number of income eligible units. (Example: When weatherizing a 20 unit building, if 15 of the units are eligible, you are only allowed \$75,000 (15 x \$5,000 (average base cost per home)) for the 20 units.)

In order to weatherize an apartment, all units in the affected building must be weatherized.

More information for weatherizing multi-family dwellings is located within DOE regulations on WAPTAC in 10 CFR 440 (Federal Regulations) and Weatherization Program Notice (WPN) 11-09.

2. The following multi-family rules and regulations apply to both DOE and LIHEAP funded weatherization projects. For energy audit purposes, DOE considers multi-family buildings to be those containing five dwelling units or more. For multi-family buildings containing less than 25 units (5-24 units), and the units are individually heated or cooled, a NEAT run must be performed to determine the proper work scope.

In order to weatherize an apartment, all units in the affected building must be weatherized. In Indiana this includes duplexes, buildings with three or four units and buildings with five or more units.

For multi-family buildings containing 25 or more units per building, sub-grantees must contact IHEDA to begin the process of submitting data to

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DOE for approval prior to the start of work on the project. IHCD will run a multi-family audit using Targeted Retrofit Energy Analysis Tool (TREAT) software and submit the results to DOE for approval. This process will include, at a minimum, obtaining the following information as required by DOE and TREAT:

Brief narrative with photos describing the building(s), including its age, its condition, number of units, spatial orientation(s), heating/cooling type (central or distributed) and condition, and any other notable conditions.

Building assessment sheets, such as lighting inventory; heating/cooling equipment and controls; air leakage determination; water usage information; combustion/CO/CAZ testing; insulation type and levels; base load analysis; windows and doors type and orientation; health and safety concerns, etc.

Weatherization statement of work, project timeline, and projected costs (materials and labor), any landlord contributions or buy-down provisions.

Complete copy of the audit showing all inputs/outputs (or engineering assessments and report) including a narrative describing the methodology used to assess the building(s) (i.e. was every building individually audited, or were a sample audited and the others assumed to be the same).

Effective May 1, 2013, sub-grantees must obtain permission from IHCD prior to proceeding to weatherize multi-dwelling units or apartments where five (5) or more units are contained within one building.

3. Shelters

An application and eligibility determination is not required for shelters.

Agencies should determine the number of countable completions based on shelter regulations detailing that a weatherization provider may count each 800 square feet of the shelter as a dwelling unit or each floor level as one unit, as noted in 10 CFR 440.22(f).

An individual file should be kept for the shelter job.

For IWAP reporting purposes, each completion should be counted as "Data Unavailable" when reporting income categories and demographics. The box "Demographics Not Available" must be checked at the bottom of the IWAP application page.

4. Rental Procedures

The benefits of weatherization to the occupants of rental units are protected in accordance with 10CFR440.22(b)(3). Indiana's policy for the weatherization of rental units complies with 10CFR440.16(i), and all other pertinent regulations.

Sub-grantees must have the following procedures in place before proceeding with weatherization of a rental unit:

Written permission of the building owner or his agent before commencing;

Benefits of the services accrue primarily to the low income tenants residing in such units;

For a reasonable period of time after completion, the household will not be subjected to rent increases;

No undue or excessive enhancements shall occur to the value of the dwelling unit and

A landlord agreement as required by the Sub-grantee.

Sub-grantees are required to have and abide by their written policies detailing the terms of the landlord/tenant agreement and any landlord contribution policy the sub-grantee has adopted.

Landlords may be required to contribute financially toward the cost of completing a unit, and/or to complete specific work on the unit. In cases where the landlord meets the definition of low income, and is eligible for services, the sub-grantee cannot require financial participation on the part of the landlord. Furthermore, sub-grantees will ensure that clients realize the primary benefits from the weatherization work. Sub-grantees may also include in their landlord policy a provision that does not require a landlord contribution if the landlord is a 501(c)3 non-profit organization.

Landlord agreement forms must be included in the files of all weatherized rental units. At a minimum, landlord agreements must state that:

For a one-year period after the weatherization work on the unit is completed, rent cannot be increased, unless the increase is not related to weatherization services performed, as noted in 10CFR440.22(b)(3)(ii).

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Landlord and/or other contributions shall be expended in accordance with the agreement between the landlord and the weatherization sub-grantee, as noted in 10CFR440.22 (d).

Written permission of the landlord, or the landlord's agent, must be obtained prior to the weatherization of the dwelling.

Landlord contributions are not to be counted as program income, but must be applied to the program in one of two ways.

Agencies that require landlord contributions must use a net system when charging weatherization. As an example, if the cost of the work is \$4,000.00, and the landlord contributes 50%, or \$2,000.00, weatherization may be charged for only the remaining \$2,000.00.

Agencies that do not require landlord contributions, but receive contributions without stipulations as to their use, must then use those funds to enhance the weatherization program.

Sub-grantees are required to develop a written appeals process for dealing with rental units. The process should be available to resolve disputes over raising rent following the weatherization process.

The primary purpose of the weatherization program is to lower the total residential energy expenditures of low-income persons. Agencies are to ensure that no undue enhancement shall occur to increase the value of the dwelling units, as noted in 10CFR440.22 (b) (3)(iv). Undue enhancement is defined by DOE as any improvement to the property that goes beyond the scope of energy conservation work.

Agencies are not required to place liens on rental property that has been weatherized, but must ensure protection of the low-income household from improper eviction or sale of property. Agencies must be aware of the legal protection available and be prepared to make appropriate referrals when necessary.

Describe the deferral Process

While clients may meet eligibility requirements for weatherization, Sub-Grantees may defer a client because the housing unit is not a good candidate for weatherization. A deferral may occur due to problems that are beyond the scope of weatherization such as condition of the structure, area is slated for redevelopment or health and safety reasons. *Updated as of 5/1/2013 300 - 26*

Deferrals may take place during any phase of the weatherization process, including but not limited to: during or after the energy audit, the work performance phase, or immediately following the identification of a health and safety risk to the occupants or to crew and contractors and must be in writing.

Postponement of work is advisable until deferral issues can be resolved either by the client and/or by alternative sources of assistance. Below are examples of existing conditions under which a dwelling unit can be deferred until certain corrective actions occur:

? Elevated carbon monoxide levels where abatement is not possible using WAP funds

? Existing moisture problems that cannot be resolved under the health and safety limits

? House with sewage or other sanitary problems that not only endangers the client, but the workers who will perform the weatherization work

? Occupant's health condition

? Building structure or its mechanical systems, including electrical and plumbing, are in such a state of disrepair that failure is imminent and these conditions cannot be resolved in a cost effective manner

? Client is uncooperative, abusive, or threatening to crew, subcontractors, auditors, inspectors, or others who must work on or visit the house

? Extent and condition of lead-based paint in the house would potentially create further health and safety hazards

? The house has been condemned or electrical, heating, plumbing, or other equipment has been "red tagged" by local or state building officials or utilities.

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? The home is in foreclosure, for sale or condemned and the owner will not be occupying the units throughout the duration of the weatherization work.

? Any existing condition that could endanger the health and/or safety of the work crew or subcontractor and cannot be safely abated within the scope of WAP

All agencies will pursue alternative funding resources to reduce the occurrence of deferral. Agencies should establish lines of communication with other funding sources so that referrals can occur in an efficient manner. The following is a list of potential funding sources to help remedy situations in a home:

? U.S. Department of Housing and Urban Development (HUD) - HOME Program

? HUD - Community Development Block Grant

? U.S. Department of Health and Human Services - Community Services Block Grant

? U.S. Department of Agriculture - Rural Economic Community Development

? State-funded housing and rehabilitation programs

? Low-income program funds provided by local utilities

? City-funded housing and rehabilitation programs

? Donations or financial participation from landlords

? Donations from local churches or community groups

All clients who are deferred must receive a letter outlining the reason(s) for the deferral. An Applicant Notification Letter (Appendix Q) must be mailed to the client and a copy included in the client file.

Any client who has received a deferral by a local agency must be allowed to pursue an appeal. The appeal will follow the established procedure set forth in the Section 103 of this manual. The right to appeal information provided to any deferred household must contain the following three processes: Local Review, Executive Review, and State Review

Local review involves the written policy of each Sub-grantee for handling client complaints or appeals of program decisions. The final step in the local process should involve a written determination by the agency Executive Director.

State review occurs when a denied/deferred weatherization applicant is not satisfied with the local agency determination. The applicant appeal must be made in writing within thirty days of the local denial/deferral, to the Indiana Housing and Community Development Authority Chief Community Services Officer. All pertinent material to the case will be requested from the Sub-grantee by IHCDA in order to make a determination.

IHCDA's legal staff shall designate a hearing officer who has not participated in any prior decision with regard to the applicant. The hearing officer will provide notice of the date, time and location of the hearing within thirty days of the written request. The hearing may be conducted in person, or by telephone. The applicant shall have the opportunity to review all documentation submitted to IHCDA.

The costs associated with deferred audits are an allowable charge under Base Program Operations. Those agencies using contractors must be able to document on the deferral invoice that the charge was for a deferred home and is not attributable to any particular completion.

V.1.3 Definition of Children

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

V.1.4 Approach to Tribal Organizations

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

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

Native Americans are served in the general population and will be eligible to receive benefits equivalent to the assistance provided to other low-income persons living in Indiana.

V.2 Selection of Areas to Be Served

Selection of sub-grantees to implement the Weatherization Assistance Program is made in accordance with 440.15(a)(d). IHCDCA contracts with twenty-three (23) sub-grantees to cover Indiana's 92 counties. Of the twentythree (23) sub-grantees, twenty-one (21) are community action agencies, one (1), People Working Cooperatively, is a non-profit agency, and one (1), Job Source (DBA Central Indiana Community Action Program), is a unit of local government. The territory once served by ACTION, Inc. (Grant and Delaware Counties) was temporarily being covered by Interlocal Community Action Program (ICAP). During 2012, IHCDCA performed an RFP process to permanently award this service territory. As a result of the RFP process, IHCDCA awarded Grant County to Job Source (DBA CICAP) and Delaware County to ICAP. The awarding of these counties became effective April 1, 2013.

440.15(a) - Preference is given to any sub-grantee that has administered, or is currently administrating, an effective program, with program effectiveness evaluated by consideration of factors including, but not limited to:

- Demonstrated ability to achieve projected goals and objectives,
- Quality of weatherization work as demonstrated by past program performance,
- Ability to staff program with qualified, trained, and experienced employees,
- Previous program experience, both in weatherization and other low-income program, and
- Ability to fulfill procedures for fiscal record keeping under Indiana and Federal codes.

If one of the current 23 sub-grantees is unable to administer the Weatherization Program in their respective county or counties, or if their program is cited for non-compliance, corrective actions will be taken. With support from IHCDCA and the awarded technical assistance provider, the sub grantee in question will:

Implement a 120-day quality improvement plan (QIP). A QIP is prescribed to sub-grantees with a significant number of technical findings and/or program deficiencies. The QIP process includes drafting a remediation plan, assigning responsibilities for resolving findings, and fully participating in monthly monitoring visits.

- Implement a modified QIP. A modified QIP is prescribed to sub-grantees with less dire, but still numerous, findings and concerns. The modified QIP process includes drafting a remediation plan, assigning responsibilities for resolving findings, and quarterly monitoring visits.

If the QIP does not result in the correction of all issues in question, IHCDCA has the option to either extend the QIP period or remove the Weatherization Assistance Program from the sub-grantee. If the State chooses to remove the weatherization program from the sub grantee, IHCDCA will go through the following actions to ensure continued service in the sub-grantee's service area:

- Removal of the program from the sub-grantee will not be done until a suitable organization can be found to administer the program, either on a temporary or permanent basis. This will ensure that the transfer of the program will not result in a gap in service to clients for any period of time.
- If funding is removed in part from a particular sub-grantee, IHCDCA will exercise discretion in either redistributing that funding to existing sub-grantees or new sub-grantee(s) using the RFP method identified below, or awarding funding to those sub-grantees meeting qualifications under 440.15(a) and are capable of handling additional funds, as evidenced by their grant spending in conjunction with production benchmarks.
- In selecting an organization to take over the weatherization program, an RFP will be sent out to (in order of priority) neighboring sub-grantees, statewide sub-grantees, local non-profit organizations, and local units of government.
- Once an organization is selected, a date will be determined for program transfer. IHCDCA will coordinate the transfer with the old and new sub-grantee.

V.3 Priorities for Service Delivery

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DOE requires that priority be given to the elderly (age 60 years and older) and people with disabilities. Owner-occupied and renter-occupied dwelling units have equal priority. In addition, DOE allows States the option to prioritize households with children (age 18 or younger). IHCD has chosen to add the aforementioned households to its priority list. IHCD requires sub-grantees to develop policies that emphasize priority households based on the aforementioned characteristics.

One way sub-grantees can designate and order households based on DOE's priority regulations is by using the matrix scoring system found on the Energy Assistance Program Application (EAP). This matrix score is the basis for Indiana's priority system and is used to identify at risk households for client service. Although the matrix system is the preferred method for prioritizing households, sub-grantees are not required to utilize this method. Alternative methods must still meet DOE's priority standards.

These alternative methods are outlined below:

- People who are elderly or disabled or households with children;
- Other priority determination(s) as set by sub-grantee; and
- All other income eligible households.

Sub-grantees are monitored for compliance with the priority list during the annual file review process.

V.4 Climatic Conditions

Indiana's climatic data is compiled from the records of the National Oceanic and Atmospheric Administration (NOAA) from weather data is collected from 150 sites in Indiana. Each sub-grantee has a unique sub-grantee average of heating degree days (HDD) that is determined by the weather data collected over the past 30 years from the counties the sub-grantee serves. For counties that did not have data collection sites, an average HDD was computed using data from adjoining counties. This step also ensures that sub-grantee service areas are in the same heat zone. Indiana has two heat zones, which are divided based on average HDD by the U.S. Energy Information Administration. The upper two-thirds of the counties in the state are in Zone 2, which means they have between 5,500-7,000 HDD. The lower one-third of the counties in the state are in Zone 3, which means they have between 4,000-5,499 HDD. In conducting tests for the waiver audit, homes are sampled from both climate zones. The formula used to calculate HDDs is as follows:

- Take the base temperature of 65 degrees and subtract the average daily temperature for a given calendar day to equal the heating degree days (example: 65-55=10 HDDs);
- Only days with average temperatures lower than the base temperature will be counted as HDDs;
- Repeat this process for each day of the year; and
- Add together the total HDDs for a sub-grantee's HDD's sum.

V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials

IHCD will ensure maximum energy savings by making certain that homes weatherized in Indiana receive the highest quality of work. The Indiana Weatherization Program accomplishes this by maintaining an excellent staff of state monitors and a progressive training facility. To ensure that procedures are being properly applied, sub-grantees receive specific technical training along with field visits and enhanced training at the field site. Additionally, IHCD has purchased equipment for sub-grantee use, including; new blower doors, stronger insulation machines, digital gauges, carbon monoxide detectors, infrared cameras, and spray foam rigs to stay current with today's most energy efficient technology.

Sub-grantee auditors conduct a whole-home audit and work is completed based on what the results of the audit specify is required to make the home more energy efficient. All homes being weatherized are treated with the whole-home system approach, with the goal of aligning thermal and pressure boundaries on every home. Additionally, as part of the whole home audit, extensive testing of combustion appliances is conducted to ensure client and worker health and safety. After the initial audit is completed, sub-grantee crews or contractors may then complete the weatherization work based on either the approved waiver audit or a site specific audit using tools such as NEAT and MHEA. NEAT/MHEA are to be used when cost restrictions or complicated housing stock make the decision process unclear, if an auditor is unsure how to prioritize the measures a home needs when a sub-grantee does not have enough money to accomplish all the work the home needs, or if an auditor believes a furnace could be replaced for energy efficiency reasons. Indiana's site built and mobile home audit priority list were approved by DOE September 20, 2011. During 2012, as required by WPN 12-09, IHCD submitted their plan to address incidental repair cost within their priority lists to DOE. This plan was approved by DOE with notification being provided to IHCD April 9, 2013. The approved incidental repair plan is considered an amendment to Indiana's priority list resulting in Indiana's priority list continuing in effect until September 2016.

Indiana's approved audit priority lists are as follows:

Site Built Home Waiver Audit:

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1. Health and Safety

- Combustion Appliance Efficiency, Repairs, Replacements
- Other Health & Safety as needed
- (Indiana does not wish to add any General Heat Waste measures to the current DOEP approved list.)
- Blower door directed air sealing
 - Major air leaks and bypasses
 - Duct Sealing
- Water heater tank and pipe insulation, low flow shower heads and aerators
- Furnace procedure detailed in the Indiana Weatherization Field Guide
- Lighting – compact fluorescent bulbs
- Blower door directed air sealing limited by economic guidelines and building tightness limits.

2. General Heat Waste Reduction – (Incidental Repair limited to \$500.00)

3. Client Education

4. Insulate un-insulated (R-0 to R-7) attics to R-38 final –(Incidental Repair limited to \$1.53 per \$1.00 of insulation cost)
5. Insulate un-insulated ducts located outside of the thermal boundary to an R-6 minimum (Incidental Repair limited to \$1.25 per \$1.00 of insulation cost)
6. Insulate un-insulated walls to R-15 (high density tube-in)(Incidental Repair limited to \$0.99 per \$1.00 of insulation cost)
7. Insulate partially insulated (R-8 to R-19) attics to R-38 final (Incidental Repair limited to \$0.82 per \$1.00 of insulation cost)
8. Insulate un-insulated (R-0 to R-7) basement/crawl space ceilings to R-30 whenever they form the thermal boundary OR insulate box sills/plates to R-19 and foundation walls to R-11 minimum whenever they for the thermal boundary(Incidental Repair limited to \$0.41 per \$1.00 insulation cost)
9. Minor Air Sealing

*Incidental Repair costs limited to \$500.00 for entire dwelling completion.

Mobile Home Waiver Audit:

1. Health and Safety

- Combustion Appliance Efficiency, Repairs, Replacements
- Other Health & Safety as needed
- (Indiana does not wish to add any General Heat Waste measures to the current DOE approved list.)
- Blower door directed air sealing
- Major air leaks and bypasses
- Duct Sealing
- Water heater tank and pipe insulation, low flow shower heads and aerators
- Furnace procedure detailed in the Indiana Weatherization Field Guide
- Lighting – compact fluorescent bulbs
- Blower door directed air sealing limited by economic guidelines and building tightness limits

2. General Heat Waste Reduction – (Incidental repair limited to \$500.00)

3. Client Education

4. Insulate walls if the available cavity air space is > 1" (Incidental Repair limited to \$0.40 per \$1.00 of insulation cost)
5. Insulate ceilings if the existing insulation is R-11 or less (Incidental Repair limited to \$0.25 per \$1.00 of insulation cost)
6. Insulate floors if the existing insulation is R-11 or less (No room for Incidental Repair cost)
7. Install inside storm windows where there are none present (No room for Incidental Repair cost)
8. Minor Air Sealing

*Incidental Repair costs limited to \$500.00 for entire dwelling completion.

V.5.2 Energy Audit Procedures

Audit Procedures and Dates Most Recently Approved by DOE

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Single-Family : NEAT-based priority list, approved by DOE September 20, 2011

Manufactured Housing : MHEA-based priority list, approved by DOE September 20, 2011

Multi-Family : Handled on a case-by-case basis per DOE multi-family regulations

Comments

Indiana's waiver audit priority list was compiled by conducting NEAT or MHEA audits on model homes across Indiana that are representative of the typical housing stock served by the state's weatherization program. The results of the audit runs were analyzed by the Indiana Community Action Association (INCAA). Changes to the mobile home priority list include realigning the insulation retrofits as called for by MHEA and adding the installation of inside storm windows. Both audits were amended to include installing a smart thermostat as a general heat waste measure. IHCD allows for replacement of incandescent bulbs with compact fluorescent (CFL) bulbs. They are replaced in areas where lights are left on for at least two hours a day. The projected 75% savings in electricity with CFL bulbs over incandescent bulbs justifies the cost of the bulbs.

Refrigerator testing and replacement is not considered an allowable cost under this grant; refrigerator replacement will be allowed only if utility companies cover the entire cost of replacement. This decision comes after the LIHEAP funded refrigerator replacement program revealed that the majority of refrigerators replaced did not have a savings to investment ratio (SIR) to warrant replacement. Additionally, issues with vendor pricing, selection, and delivery resulted in sub-grantees spending excessive amounts of administrative time on each refrigerator replacement.

V.5.3 Final Inspection

Each sub-grantee, or its authorized representative, is required to complete a pre- and post-inspection of each unit weatherized. A dwelling that receives furnace work in excess of simply a clean and tune requires an interim audit if the work was not performed by either a BPI certified heating technician or an Indiana-trained "Competent Retrofit Installer-Mechanical". If the home is a total electric home, no interim audit is required. If a job cannot be completed within 45 days of invoice, an interim audit can be conducted on a home with any type of heating system to verify that the heating work is done correctly and payment can be made within 45 days of invoice.

Per DOE WPN 11-03, sub-grantees may not count a unit as completed until any rework mandated by IHCD monitoring is fixed. IHCD procedures state that a dwelling unit may not be reported as completed until a final inspection has been performed in accordance with 440.16(g), it has been certified that the work has been completed in a workmanlike manner and in accordance with approved procedures in 440.21, and all materials have been properly installed.

IHCD ensures compliance with 440.16 (g) by monitoring at least 10% of client files and at least 5% of homes completed by each sub-grantee.

V.6 Weatherization Analysis of Effectiveness

Energy Saving Effectiveness:

Starting in 2010, IHCD and INCAA transitioned their method of assessment of weatherization effectiveness from Princeton Score keeping Method (PRISM) to the Building Energy Analysis of Consumption (BEACon) system. This switch allows IHCD to review a larger selection of homes for energy efficiency improvements, produces better electric savings information, and cuts down on administration costs in the long run since information can be gathered electronically. BEACon will continue to be used in 2013 as it has provided more reliable savings results both for natural gas and electricity. It has also allowed IHCD's sample size to be much larger, giving a clearer picture of the actual savings achieved by sub-grantees on a variety of homes and fuel sources.

Sub-grantee Effectiveness:

To assess sub-grantees' procedural effectiveness, IHCD monitors use a combination of monitoring and T&TA. Sub-grantees with deficiencies may be required to attend training specific to the sub-grantee's needs. Sub-grantee deficiencies and subsequent training include but are not limited to: lack of managerial oversight, inadequate technical, fiscal and database management, and client education procedures.

In addition, IHCD and sub-grantee personnel continuously evaluate the effectiveness of training provided through IHCD and the awarded technical assistance provider's training program. This is done through a combination of monitoring of sub-grantees, feedback at Managers' meetings, and meetings with the technical assistance provider.

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V.7 Health and Safety

- It is imperative to ensure that weatherization activities do not cause or exacerbate health and safety problems for workers and clients. As such, DOE-approved health and safety measures are undertaken to ensure that the pending weatherization work does not create dangerous living conditions for the client. Health and safety activities are conducted within reasonable cost boundaries that get the home to a condition where weatherization work can move forward.

Health and Safety Plan Updates

- In 2011, Indiana was granted approval to utilize up to 20% of our 2011 award for Health and Safety. Without additional grant funds awarded for 2012, Indiana was approved to maintain the increased level of 20% for the unspent funds in 2012. Indiana will maintain the level for Health and Safety expenditures at 20% for the FY 2013 funding.
- IHCDCA has developed a system of guidelines for determining and documenting potential issues that will prevent a dwelling from being weatherized. This system includes determining how/when these issues should be remedied, referred to other agencies, result in partial weatherization, or lead to deferral. Auditors discuss these issues with the client after their initial audit. At this time, they inform the client of potential issues that will not allow their home to be weatherized. Sub grantees document the issues on the moisture assessment form (which is signed by the client at initial inspection), the gas appliance inspection form, and/or the heating system form. Clients are informed of the issues that caused deferral and what must be remedied prior to weatherization in their official deferral letter sent from the sub-grantee. Auditors and sub-grantees are charged with providing information to the client about how to correct the issue(s) that caused deferral and refer them to appropriate agencies to assist them in getting their home into a condition which would allow for weatherization.
- In an effort to bridge the gap between deferral and weatherization, IHCDCA offered Community Development Block Grant (CDBG) Owner Occupied Rehabilitation (OOR) funds to the current weatherization sub-grantees through a competitive bid process. While the funds are not automatically reserved for Weatherization sub-grantees, each sub-grantee has the opportunity to apply for funding. OOR funds may be used for the following:
 - Hard costs associated with rehabilitation activities
 - Mold remediation
 - Lead-based paint interim controls and abatement costs
 - Accessibility modifications, as part of the required rehabilitation
 - Replacement of gas ranges/stove (allowed only if the gas range/stove is a health and safety issue)

It is IHCDCA's intent that these funds ultimately reduce the number of deferrals encountered by the weatherization program and ultimately improve both the structural safety and energy efficiency of the affected homes.

- Sub-grantees are to use DOE health and safety funds when it is determined that the issue can be addressed completely within the confines of allowable health and safety measures and the home can be weatherized upon the completion of those health and safety measures. IHCDCA will investigate appropriate uses of health and safety funds at monitoring visits to ensure that homes that can receive health and safety work actually do and ensure that homes that are deferred are not deferred if health and safety funding could have been used to address the issue (s). Additionally, monitors will look into a sub grantee's use of health and safety funds if an excessive amount was used on a home that should have been deferred. Ultimately, the decision to use Health and Safety lies with the sub grantee when making the call to weatherize or defer a home.
- IHCDCA currently provides training for health and safety issues through IHCDCA's training and technical services contractor. Training and technical assistance is available for all sub-grantee staff and contractors in the state. IHCDCA will work with the contractor awarded the training and technical assistance contract to ensure that all new and existing health and safety requirements are met.
- Indiana's Weatherization Field Guide was updated in January 2012 to reflect the necessary changes brought on by implementing ASHRAE 62.2.
- Indiana's training and technical assistance contractor offer courses on Applying the ASHRAE 62.2 and DOE Health & Safety Policy.
- IHCDCA installs smoke detectors in every home weatherized that does not have one and tests those in homes with existing detectors.
- IHCDCA installs carbon monoxide detectors in every home weatherized (where applicable) that does not have one and tests those in homes with existing detectors.
- Indiana is a cold weather state, as determined by heating degree data. As such, IHCDCA does not allow for the installation of air conditioning as a DOE weatherization expense. See the guidelines below for Indiana's protocols on heating system installation.
- If problems are discovered during the testing of combustion gases, sub-grantees will take the necessary steps for repairs or replacements prior to performing any additional work on the home. The sub grantee must then perform all appropriate health and safety testing to verify that issues have been resolved and it is safe to proceed with work on the home.
- IHCDCA incorporated checking for Material Safety Data Sheets (MSDS) into its monitoring practices in 2011 and that practice continues for the

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FY 2013 funding cycle. During in-progress visits, IHCDAs' monitors will randomly choose an item being used by sub-grantee crews/contractors and will then request to see the MSDS for that particular item. Monitors will also ensure that safe work practices are being followed at the in-progress site visits. Furthermore, IHCDAs have contracted with the Environment Management Institute to conduct both the 10 and 30 hour OSHA training for sub-grantee staff and contractors. The OSHA 10 hour training is required for all weatherization workers. The OSHA 30 hour training is required for all crew leaders and HVAC personnel working alone. All new weatherization workers must receive the appropriate OSHA training within six months commencing 45 days from the date of hire.

- If an auditor finds mold in a client's home, the client is notified via the moisture assessment form, which the client must sign before the auditor leaves the home. Clients also receive a pamphlet and education on mold and moisture, which also outlines the mold issues in their home. The method that auditors use to identify mold is outlined in the section about mold below. All sub-grantee field staff and contractors are trained in mold identification and remediation.
- Monitors verify Renovator and Lead Firm status at the time of monitoring and track it to ensure that each crew and contractor firm have sufficient renovators to ensure lead safe work practices are adhered to at all applicable job sites. IHCDAs require all crews and contractors to take pictures documenting their use of Lead Safe Work Practices in order to be paid for the procedures.
- Several state agencies and organizations have joined together to devise a holistic approach to creating healthy homes for Indiana citizens. As such, IHCDAs added to its auditing procedures that auditors must screen clients for known or suspected health concerns while performing their audit of the home. This step in the weatherization process has been added to the Indiana field guide. Inquires into potential H&S concerns or pre-existing conditions will be addressed by the Auditor on two occasions: when the client is initially contacted to schedule their appointment and when the Auditor meets with the client for the initial audit. Auditors should be keen to the health concerns of the household occupants and ensure that weatherization of the home does not worsen their health concerns. Using the information on the moisture assessment form, following the minimum ventilation rates, and testing combustion appliances allows the auditor to prevent increased health problems for the client. This topic is also discussed in auditor training classes.

Health and Safety Issues

Health and safety issues must be remedied before, or because of, the installation of weatherization materials.

The following provisions apply to the health and safety issues listed further below, where applicable:

- Proper disposal of replaced appliances will include the removal of the old appliance from the client's premises. Recycling is encouraged when possible. In the case of replaced heating systems and water heaters, the replaced units will be disabled at the time of removal to prevent the appliance from being installed or used in a different location.
- Where hazards are identified, clients will be informed in writing of the hazards on the final inspection form, which the client signs. A copy of the form is kept in the client's file.
- State and local codes must be followed while installing health and safety measures.
- Crews and contractors installing health and safety measures must be trained per IHCDAs' training guidelines.

Air Conditioning and Heating Systems

Action/Allowability:

If the heating and air conditioning system is operable the system must be run through NEAT or MHEA first to determine if it is allowable to be replaced as an energy conservation measure. If it calls for a replacement, only the heating system would be replaced because Indiana is a heating state. "Red tagged", inoperable or nonexistent heating system replacement, repair, or installation is allowed with DOE funds; IHCDAs do not allow DOE funds to be used for replacing air conditioners. Repairs to an *air conditioning* system may only be made when current operation of the AC unit endangers the operation of the furnace. Repairs can be charged to either DOE or LIHEAP. The sub-grantee will first determine whether repairs can effectively be made to the heating system to enable it to operate safely, rather than require a replacement. Sub-grantees are allowed to replace heating systems in certain circumstances, as follows:

- A verifiable condition exists that allows combustion gases to enter the living environment. For example, a breach in the heat exchanger that allows combustion gases to mix with the air in the ductwork.
- An improper application of a non-sealed combustion furnace, installed in a mobile home. Mobile homes are required to have furnaces that draw their combustion air from outside the carriage. The installation of a furnace intended for use in site built homes could cause serious concentrations of combustion gases in the living environment by causing the furnace to back-draft.
- Inefficient furnaces can be replaced when a NEAT or MHEA run shows the replacement to meet a SIR of 1 or greater.

The sub-grantee may not continue with weatherization work, particularly air sealing the structure, until the combustion gases have been appropriately vented away from the living area. In the case of a plugged or non-functioning vent on a combustion appliance, appropriate steps must be taken to repair, or replace, the vent.

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Before a furnace is installed in a weatherization dwelling unit, the proper size of the furnace must be determined. Sub grantees will determine the most effective output size of the replacement furnace using Manual J heat load calculations or other appropriate methods.

Furnace replacements in Indiana's Weatherization Assistance Program are justified by Indiana's Heating Degree Days numbering in the range of 4,000 – 5,499 in the lower one-third of the State and 5,500 – 7,000 in the upper two-thirds of the State. This climatic information is incorporated into Indiana's NEAT and MHEA runs as well as their Site Built and Mobile Home Waiver Audits.

Testing:

Health and safety inspections make sure that systems are present, operable, and performing. The health and safety inspection of combustion appliances, including heating systems, includes the following items:

- The rated and measured BTU input of each gas furnace
- A complete electrical inspection of the furnace including proper grounding, polarity, wiring connections, fuse type and size, element amperage (electrical furnace), disconnect requirements and conduit requirements
- An inspection of all gas lines in the home from the source to the gas appliances or line termination. This includes all fittings, connections, shut-off valves, gas valves, sediment traps and end caps
- An inspection for spillage and a reading of the draft of gas furnaces and water heaters (Completion of the Indiana Gas Appliance Inspection Form)
- A visual check for flame interference
- A test of the setting and operation of the high limit control switch
- An evaluation of the adequacy of combustion air for combustion appliances
- A check that there are no open return air ducts/leaks in the Combustion Appliance Zone
- Carbon monoxide testing of all gas appliances
- An inspection, and replacement if necessary, of the furnace filter
- Worst case draft test

Client Education:

Auditors will discuss and provide information on appropriate use and maintenance of units and proper disposal of bulk fuel tanks when not removed.

Training:

Auditors receive extensive training in the evaluation of combustion appliances, including heating systems. Home evaluation forms that document existing combustion appliance functionality and combustion gas presence are required to be in every client file. Measurement and careful consideration of the air leakage rate of the dwelling unit prior to, and during, the course of air sealing, are important steps in the weatherization process to ensure safety and appropriateness of the weatherization measures.

Appliances and Water Heaters

Action/Allowability:

Replacement of water heaters is allowed on a case-by-case basis. Replacement and installation of other appliances, including gas cook stoves, are not allowable health and safety costs. Replacement of gas cook stoves is only allowable with LIHEAP funds and in following appropriate LIHEAP program rules. Repair and cleaning of water heaters, stoves and furnaces are allowed.

Indiana's Weatherization Program justifies a replacement with health and safety funds for the following reasons:

- Existing water heater is leaking beyond repair hindering the Weatherization process from proceeding and causing continuing and worsening moisture conditions in the home,
- Gas burner deficiencies, venting issues [draft], interior baffle issues, or a combination of such that renders the water heater beyond repair and a safety hazard to the household, and/or
- Carbon monoxide production above Indiana's standards that cannot be lowered by cleaning, adjusting or repairing.

If the total repair costs for any of the issues stated above would exceed the cost for installation upon initial inspection, sub-grantees will be required to install a new unit. Sub-grantees are required to document the reasons for replacing the water heater in the client's file.

Testing:

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Sub-grantees will determine whether water heaters are performing safely. Combustion safety testing is required when combustion appliances are present. The health and safety inspection of combustion appliances, including water heaters, includes the following items:

- An inspection of all gas lines in the home from the source to the gas appliances or line termination. This includes all fittings, connections, shut-off valves, gas valves, sediment traps and end caps
- An inspection for spillage and a reading of the draft of gas furnaces and water heaters (Completion of the Indiana Gas Appliance Inspection Form)
- A visual check for flame interference
- A test of the water temperature with adjustments made as close to 120 degrees as possible
- An evaluation of the adequacy of combustion air for combustion appliances
- A check that there are no open return air ducts/leaks in the Combustion Appliance Zone
- Carbon monoxide testing of all gas appliances
- Check for a properly installed temperature and pressure relief valve on the water heater
- Worst case draft test

Client Education:

Discuss and provide information on appropriate use, maintenance, and disposal of water heaters.

Training:

Auditors receive extensive training in the evaluation of combustion appliances, including water heaters. Home evaluation forms that document existing combustion appliance functionality and combustion gas presence are required to be in every client file. Measurement and careful consideration of the air leakage rate of the dwelling unit prior to, and during, the course of air sealing, are important steps in the weatherization process to ensure safety and appropriateness of the weatherization measures.

Asbestos- in siding, walls, ceilings, etc.

Action/Allowability:

Removal, cutting or drilling of asbestos siding is not allowed. In homes where asbestos siding exists and exterior wall insulation is needed, IHCDCA recommends, where possible, insulating the walls from the interior of the home.

Testing:

Sampling and testing for asbestos may only be performed by Asbestos Hazard Emergency Response Act of 1986 (AHERA) certified individuals.

Client Education:

Inform the client that suspected asbestos siding is present and how the presence of asbestos will affect the flow of Weatherization services.

Training:

Asbestos training is available at the Environmental Management Institute (EMI). Neither asbestos training nor certification is required by IHCDCA. As such, IHCDCA does not cover the cost for asbestos training. Basic knowledge of asbestos is covered within the scope of other Weatherization trainings offered through INCAA.

Client Education:

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Inform the client that suspected asbestos siding is present and how precautions will be taken.

Training:

Contractor training courses will teach safe practices for siding removal and replacement and how to identify asbestos containing materials.

Asbestos- in vermiculite

Action/Allowability:

When vermiculite is present, unless testing determines otherwise, IHCDCA recommends taking precautionary measures as if it contains asbestos. Safe practices include, but are not limited to, utilizing the appropriate personal protective equipment, limiting dust production, limiting foot traffic from the attic to the home, wetting the area to be disturbed and limiting the amount of vermiculite disturbed. Where blower door tests are performed, it is a best practice to perform pressurization instead of depressurization.

Testing:

Testing for asbestos in vermiculite must be performed by an AHERA certified tester and is not required by IHCDCA.

Client Education:

Clients will be notified of the existence of vermiculite in the attic and basic precautions against disturbing the material.

Training:

Asbestos training is available at the Environmental Management Institute (EMI). Neither asbestos training nor certification is required by IHCDCA. As such IHCDCA does not cover the cost for asbestos training. Basic knowledge of asbestos in vermiculite is covered within the scope of other Weatherization trainings offered by INCAA.

Asbestos- on pipes, furnaces, other small covered surfaces

Action/Allowability:

Auditors receive training within other courses offered at INCAA instructing them on the appearance of asbestos tape and insulation. Upon finding these materials in homes the auditors should assume that these materials contain asbestos and use precautionary measures including, but not limited to, utilizing appropriate personal protective gear, limiting dust production and limiting disturbance of the material.

Testing:

Asbestos testing must be performed by an AHERA certified tester and is not required by IHCDCA.

Client Education:

Clients should be instructed not to disturb suspected asbestos containing material. Auditors will provide asbestos safety information to the client.

Training:

Asbestos training is performed at the Environmental Management Institute (EMI). Neither asbestos training nor certification is required by IHCDCA. As such, IHCDCA does not cover the cost for training. Basic knowledge of asbestos is covered within the scope of other Weatherization trainings offered by INCAA.

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

Action/Allowability:

Biological concerns or unsanitary conditions are cause for deferral unless other funds are available or the cost is considered when running NEAT or MHEA. Addressing bacteria and viruses is not an allowable cost. Deferral might be necessary in cases where a known agent is present in the home that might create a serious risk to occupants or weatherization workers.

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Testing:

Auditors will conduct a sensory inspection for biological and unsanitary conditions.

Client Education:

Auditors will inform the client of observed conditions. Auditors will provide information on how to maintain a sanitary home and steps to correct deferral conditions.

Training:

Auditors receive training on how to recognize biological and unsanitary conditions and when those conditions are cause for deferral. Auditors are also trained in worker safety when coming into contact with biological and unsanitary conditions.

Building Structure and Roofing

Action/Allowability:

Building rehabilitation is beyond the scope of the Weatherization Assistance Program. Homes with conditions that require more than incidental repairs should be deferred or repaired to a condition where weatherization can occur by using OOR funds (see above for restrictions).

Testing:

Auditors will conduct a visual inspection of the building structure and roofing. Auditors will ensure that access to areas necessary for weatherization is safe for entry and performance of assessment, work, and inspection.

Client Education:

Auditors will notify clients of structurally compromised areas.

Training:

Auditors are trained on how to identify structural and roofing issues.

Code Compliance

Action/Allowability:

Correction of preexisting code compliance issues is not an allowable cost in areas other than where weatherization measures are installed. State and local (or jurisdiction having authority) codes must be followed while installing weatherization measures. Condemned properties and properties where "red tagged" health and safety conditions exist that cannot be corrected under this guidance should be deferred or repaired with OOR funds (see above).

Testing:

Auditors will conduct a visual inspection for local code enforcement inspections.

Client Education:

Clients will be informed of observed code compliance issues.

Training:

Auditors are trained in how to determine what code compliance may be required.

Combustion Gases

Action/Allowability:

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All gas furnaces, space heaters, and water heaters must be properly vented to ensure all flue products exit the home. Flue systems must be in compliance with all applicable state and local codes and be verified to vent properly by passing all IHEDA required draft testing. Repair and/or replacement of vent systems are an allowable cost for DOE Health & Safety and LIHEAP Mechanical funding.

The sub-grantee may not continue with weatherization work, particularly air sealing the structure, until the combustion gases have been appropriately vented away from the living area. In the case of a plugged or non-functioning vent on a combustion appliance, appropriate steps must be taken to repair, or replace, the vent.

Testing:

Health and safety inspections make sure that systems are present, operable, and performing. The health and safety inspection of combustion appliances, including heating systems, includes the following items:

- The rated and measured BTU input of each gas furnace
- A complete electrical inspection of the furnace including proper grounding, polarity, wiring connections, fuse type and size, element amperage (electrical furnace), disconnect requirements and conduit requirements
- An inspection of all gas lines in the home from the source to the gas appliances or line termination. This includes all fittings, connections, shut-off valves, gas valves, sediment traps and end caps
- An inspection for spillage and a reading of the draft of gas furnaces and water heaters (Completion of the Indiana Gas Appliance Inspection Form)
- A visual check for flame interference
- A test of the setting and operation of the high limit control switch
- An evaluation of the adequacy of combustion air for combustion appliances
- A check that there are no open return air ducts/leaks in the Combustion Appliance Zone
- Carbon monoxide testing of all gas appliances
- An inspection, and replacement if necessary, of the furnace filter
- Check for a properly installed temperature and pressure relief valve on the water heater
- A measurement and adjustment, if needed, of the water temperature
- Worst case draft test

Client Education:

Auditors will provide clients with combustion safety and hazards information, including the importance of using exhaust ventilation when cooking and the importance of keeping burners clean to limit the production of CO.

Training:

Auditors receive extensive training in the evaluation of combustion appliances. Home evaluation forms that document existing combustion appliance functionality and combustion gas presence are required to be in every client file. Measurement and careful consideration of the air leakage rate of the dwelling unit prior to, and during, the course of air sealing, are important steps in the weatherization process to ensure safety and appropriateness of the weatherization measures.

Drainage- gutters, down spouts, extensions, flashing, sump pumps, landscape, etc

Action/Allowability:

Major drainage issues are beyond the scope of the Weatherization Assistance Program. Homes with conditions that might create a serious health concern are cause for deferral unless other funds are available, the cost is considered when running NEAT or MHEA, or is funded through the OOR program (see above).

Testing:

Auditors will conduct a visual inspection for drainage issues.

Client Education:

Auditors will inform clients of the importance of cleaning and maintaining drainage systems and relay information on proper landscape design.

Training:

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Auditors receive training on how to recognize drainage issues.

Electrical, other than knob-and-tube wiring

Action/Allowability:

Minor electrical repairs are allowed with DOE incidental repairs funds where the health and safety of the client is at risk. Additionally, upgrades and repairs are allowed to electrical systems when those repairs are necessary to perform specific weatherization measures.

Testing:

Auditors will conduct a visual inspection for electrical issues. They will also conduct voltage drop and voltage detection tests when needed.

Client Education:

Auditors will provide information to clients on overloading circuits, electrical safety, and electrical risks.

Training:

Auditors are trained in how to identify electrical hazards and are knowledgeable of local codes for compliance.

Electrical, knob-and-tube wiring

Action/Allowability:

Per the electrical inspection section of the 2011 edition of the Indiana Field Guide, auditors identify any knob and tube wiring found in the dwelling and test if to see if it is live. If it is spliced into conventional circuitry, auditors note the breakers or fuses controlling the circuit. Building performance retrofits must conform to NEC or local code.

Live knob and tube wiring can never be covered or surrounded by insulation as a result of any weatherization measure. Boxing of knob and tube wiring prior to insulation is acceptable.

Testing:

Auditors will inspect for the presence and condition of knob-and-tube wiring and check for alterations that might create an electrical hazard. Voltage drop and voltage detection tests are allowed.

Client Education:

Auditors will provide clients with information on over-current protection, overloading circuits, and basic electrical safety and risks.

Training:

Auditors are instructed to avoid insulating over or dense packing around live knob and tube wiring while installing insulation in attics, floors, or walls. Boxing of knob and tube wiring prior to insulation is acceptable.

Fire Hazards

Action/Allowability:

Correction of fire hazards is an allowable cost when necessary to safely perform weatherization.

Testing:

Auditors will check for fire hazards in the home during the audit and while performing weatherization.

Client Education:

Auditors will inform the client of observed fire hazards.

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Training:

Auditors are trained on how to recognize potential hazards and when removal is necessary.

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

Action/Allowability:

Removal of pollutants that might create a serious health concern are cause for deferral unless other funds are available, the cost is considered when running NEAT or MHEA or is funded through the OOR program (see above). If removal cannot be performed or is not allowed by the client, the unit must be deferred.

Testing:

Auditors will conduct a sensory inspection for formaldehyde, VOCs, and other air pollutants.

Client Education:

Auditors will inform clients of the observed conditions and the associated risks. Auditors will provide the client written materials on safety and proper disposal of household pollutants.

Training:

Auditors are trained on how to recognize potential hazards and when removal is necessary.

Injury Prevention of Occupants and Weatherization Workers—measures such as repairing stairs and replacing handrails

Action/Allowability:

Workers must take all reasonable precautions against performing work on homes that will subject workers or occupants to health and safety risks. Minor repairs and installation may be conducted only when necessary to effectively weatherize the home; otherwise, these measures are not allowed.

Testing:

Auditors will observe if dangers are present that would prevent weatherization.

Client Education:

Auditors will inform clients of observed hazards and associated risks.

Training:

Auditors are trained to be aware of potential hazards.

Lead Based Paint

In response to DOE's actions in adopting the EPA's revised lead protocols, Indiana underwent a number of steps in order to adhere to the new EPA standards as outlined in the Renovation, Repair, and Painting Rule (RRP). Indiana is compliant with this rule and the steps taken to be compliant are outlined below:

- All 23 sub-grantees have at least one Niton brand XRF 300 analyzer. Recalibration of the XRF is not an allowable cost with DOE funds. All recalibration expenses must be paid for with LIHEAP dollars. See the policies and procedures manual for further details.
- All sub-grantees will be required to maintain Lead Firm status through the EPA -All sub-grantees will have at least one staff member who has achieved their Renovator certification.
- The Environmental Management Institute (EMI) is the training provider for lead renovator training.
- Monitoring has included an LSW component which reviews practices, inventory, and reporting.

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The purpose of the steps outlined above is to ensure full compliance with the EPA rule and to ultimately provide a better service to those clients which live in housing built prior to 1978 wherein the weatherization program will be disturbing more than the de minimus levels of painted surface.

Indiana has implemented a policy regarding lead based paint procedures on homes being weatherized. This policy includes providing clients with the pamphlet "Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools" and obtaining certification that they received the form. Sub-grantee staff working in homes are trained on how to work in a safe lead environment to ensure adherence to EPA, OSHA Rule 29 CFR 1926 as well as to HUD's Lead Paint Hazard Control, 24 CFR 35 (Part 35). All sub-grantees performing weatherization services are encouraged to obtain Pollution Occurrence Insurance.

New employees are trained on lead safe work practices within the first six months of employment to protect employees from the hazards of lead during weatherization work, to limit worker exposure to airborne lead during weatherization, and to ensure that employers such as CAA's communicate the hazards of all hazardous chemicals in the workplace by:

1. Labeling all containers of hazardous chemicals
2. Having a written hazard communication program
3. Providing material safety data sheets, including on lead
4. Training workers on safe chemical practices during normal and emergency actions.

What must sub-grantees do?

1. Provide the Lead Paint form to all clients and landlords.
2. Either:
 1. Use the XRF machine to determine levels of lead in work areas as well as in individual components that might be disturbed when completing weatherization work.
 2. Assume Lead Based Paint and follow Lead Safe Work Practices including clean-up and testing as outlined in the RRP rule for applicable housing.

Sub-grantees shall use the following lead-safe work practices whenever known or presumed lead-based paint is disturbed. Please note that additional work practices are required when the work is covered by the HUD rule.

Sub-grantees will not be required to follow Lead-Safe guidelines for the following repairs, per the RRP Rule.

- Renovation or repair to housing built in 1978 or later
- Renovation or repair to zero-bedroom dwellings (studio apartments, dormitories, etc.).
- Renovation or repair to housing or components declared lead-free by a certified inspector or risk assessor
- Minor repair and maintenance activities that disturb 6 square feet or less of paint per room inside, or 20 square feet or less on the exterior of a home or building
- Note: minor repair and maintenance activities do not include window or door replacement and projects involving demolition or prohibited practices

All sub grantees must follow the following pre-renovations education requirements in all homes which do not meet the exemption criteria mentioned above.

- In housing, you must distribute EPA's lead pamphlet to the owner and occupants before renovation starts.
- For work in common areas of multi-family housing or child-occupied facilities, you must distribute renovation notices to tenants or parents/guardians of the children attending the child-occupied facility. Or you must post informational signs about the renovation or repair job.

Informational signs must:

1. Be posted where they will be seen;
2. Describe the nature, locations, and dates of the renovation; and
3. Be accompanied by the lead pamphlet or by information on how parents and guardians can get a free copy (see page 31 for information on obtaining copies).

Sub-grantees must obtain confirmation of receipt of the lead pamphlet (see page 23) from the owner, adult representative, or occupants (as applicable), or a certificate of mailing from the post office.

As of April 22, 2010 all sub grantees must comply with the following guidelines:

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- Firms must be certified
- Renovators must be certified
- Lead-safe work practices must be followed

Firm Responsibilities

Firms performing renovations must ensure that:

1. All individuals performing activities that disturb painted surfaces on behalf of the firm are either certified renovators or have been trained by a certified renovator;
2. A certified renovator is assigned to each renovation and performs all of the certified renovator responsibilities;
3. All renovations performed by the firm are performed in accordance with the work practice standards of the Lead-Based Paint Renovation, Repair, and Painting Program
4. Pre-renovation education requirements of the Lead-Based Paint Renovation, Repair, and Painting Program are performed;
5. The program's recordkeeping requirements are met.

Renovator Certification

To become a certified renovator an individual must successfully complete an eight-hour initial renovator training course offered by an accredited training provider (training providers are accredited by EPA, or by an authorized state or tribal program). The course completion certificate serves as proof of certification. Training providers can apply for accreditation for renovator and dust sampling technician training beginning in April 2009. Once accredited, trainers can begin to provide certification training.

Any sub-grantee staff or contractors who have successfully completed an accredited lead abatement worker or supervisor course, or individuals who have successfully completed an EPA, Department of Housing and Urban Development (HUD), or EPA/HUD model renovation training course, need only take a four-hour refresher renovator training course instead of the eight-hour initial renovator training course to become certified.

Renovators at either the sub-grantee or the sub-grantee's contractor must adhere to the following:

1. Must use a test kit acceptable to EPA, when requested by the party contracting for renovation services, to determine whether components to be affected by the renovation contain lead-based paint
2. Must provide on-the-job training to workers on the work practices they will be using in performing their assigned tasks
3. Must be physically present at the work site when warning signs are posted, while the work-area containment is being established, and while the work-area cleaning is performed
4. Must regularly direct work being performed by other individuals to ensure that the work practices are being followed, including maintaining the integrity of the containment barriers and ensuring that dust or debris does not spread beyond the work area
5. Must be available, either on-site or by telephone, at all times renovations are being conducted.
6. Must perform project cleaning verification
7. Must have with them at the work site copies of their initial course completion certificate and their most recent refresher course completion certificate
8. Must prepare required records

Work Practice Requirements: General

1. Renovations must be performed by certified firms using certified renovators;
2. Firms must post signs clearly defining the work area and warning occupants and other persons not involved in renovation activities to remain outside of the work area. These signs should be in the language of the occupants;
3. Prior to the renovation, the firm must contain the work area so that no dust or debris leaves the work area while the renovation is being performed;
4. Work practices listed below are prohibited during a renovation:
 1. Open-flame burning or torching of lead-based paint;
 2. Use of machines that remove lead-based paint through high speed operation such as sanding, grinding, power planing, needle gun, abrasive blasting, or sandblasting, unless such machines are used with HEPA exhaust control; and
 3. Operating a heat gun on lead-based paint at temperatures of 1100 degrees Fahrenheit or higher.
5. Waste from renovations:
 1. Waste from renovation activities must be contained to prevent releases of dust and debris before the waste is removed from the work area for storage or disposal.
 2. At the conclusion of each work day and at the conclusion of the renovation, waste that has been collected from renovation activities must be stored to prevent access to and the release of dust and debris.

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3. Waste transported from renovation activities must be contained to prevent release of dust and debris.

Work Practice Requirements: Specific to Interior Renovations

1. Remove all objects from the work area or cover them with plastic sheeting with all seams and edges sealed.
2. Close and cover all ducts opening in the work area with taped-down plastic sheeting.
3. Close windows and doors in the work area. Doors must be covered with plastic sheeting.
4. Cover the floor surface with taped-down plastic sheeting in the work area a minimum of six feet beyond the perimeter of surfaces undergoing renovation or a sufficient distance to contain the dust, whichever is greater.
5. Use precautions to ensure that all personnel, tools, and other items, including the exteriors of containers of waste, are free of dust and debris when leaving the work area.
6. After the renovation has been completed, the firm must clean the work area until no dust, debris or residue remains. The firm must:
 1. Collect all paint chips and debris, and seal it in a heavy-duty bag.
 2. Remove and dispose of protective sheeting as waste.
 3. Clean all objects and surfaces in the work area and within two feet of the work area in the following manner:
 1. Clean walls starting at the ceiling and working down to the floor by either vacuuming with a HEPA vacuum or wiping with a damp cloth.
 2. Thoroughly vacuum all remaining surfaces and objects in the work area, including furniture and fixtures, with a HEPA vacuum.
 3. Wipe all remaining surfaces and objects in the work area, except for carpeted or upholstered surfaces, with a damp cloth. Mop uncarpeted floors thoroughly using a mopping method that keeps the wash water separate from the rinse water, or using a wet mopping system.
 4. Cleaning verification is required to ensure the work area is adequately cleaned and ready for re-occupancy. See Flow Chart 6 for instructions on performing cleaning verification for interior projects.

Work Practice Requirements: Specific to Exterior Renovations

1. Close all doors and windows within 20 feet of the renovation.
2. Ensure that doors within the work area that will be used while the job is being performed are covered with plastic sheeting in a manner that allows workers to pass through while confining dust and debris.
3. Cover the ground with plastic sheeting or other disposable impermeable material extending a minimum of 10 feet beyond the perimeter or a sufficient distance to collect falling paint debris, whichever is greater.
4. In situations such as where work areas are in close proximity to other buildings, windy conditions, etc., the renovation firm must take extra precautions in containing the work area, like vertical containment.
5. After the renovation has been completed, the firm must clean the work area until no dust, debris or residue remains. The firm must:
 1. Collect all paint chips and debris, and seal it in a heavy-duty bag.
 2. Remove and dispose of protective sheeting as waste.
 3. Waste transported from renovation activities must be contained to prevent release of dust and debris. A certified renovator must perform a visual inspection-is dust, debris, or residue present?
 4. These conditions must be eliminated and another visual inspection must be performed.
6. Once the area has been adequately cleaned you're finished.

Renovators at either the sub grantee or the sub grantee's contractor must adhere to the following:

1. Must use a test kit acceptable to EPA, when requested by the party contracting for renovation services, to determine whether components to be affected by the renovation contain lead-based paint (EPA will announce which test kits are acceptable prior to April 2010. Please check our Web site at www.epa.gov/lead).
2. Must provide on-the-job training to workers on the work practices they will be using in performing their assigned tasks.
3. Must be physically present at the work site when warning signs are posted, while the work-area containment is being established, and while the work-area cleaning is performed.
4. Must regularly direct work being performed by other individuals to ensure that the work practices are being followed, including maintaining the integrity of the containment barriers and ensuring that dust or debris does not spread beyond the work area.
5. Must be available, either on-site or by telephone, at all times renovations are being conducted.
6. Must perform project cleaning verification.
7. Must have with them at the work site copies of their initial course completion certificate and their most recent refresher course completion certificate.
8. Must prepare required records.

All sub grantees are also subject to the following recordkeeping requirements:

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- All documents must be retained for three years following the completion of a renovation.
- Records that must be retained include:
 - Reports certifying that lead-based paint is not present.
 - Records relating to the distribution of the lead pamphlet.
- Any signed and dated statements received from owner-occupants documenting that the requirements do not apply (i.e., there is no child under age 6 or no pregnant woman who resides at the home, and it is not a child-occupied facility).
- Documentation of compliance with the requirements of the Lead-Based Paint Renovation, Repair, and Painting Program (EPA has prepared a sample form that is available at

www.epa.gov/lead/pubs/samplechecklist.pdf <<http://www.epa.gov/lead/pubs/samplechecklist.pdf>>).

Mold and Moisture

Action/Allowability:

The Weatherization Assistance Program is not a mold remediation program. The use of DOE funds for removal of mold and other related biological substances is not an allowable weatherization expense. DOE funds should not be used to test, abate, remediate, purchase insurance, or alleviate existing mold conditions identified during the audit, the work performance period, or the quality control inspection. Low cost or no cost measures to clean moisture damaged surfaces are allowed and may be charged to Health and Safety. Houses with mold and moisture issues that require more than no cost or low cost measures must be deferred or remedied with the use of OOR money.

Sub-grantees must measure indoor humidity levels and potential sources for excess moisture. Identified problems and sources are documented on the Moisture Assessment Findings form that is signed by the local sub-grantee, client, and/or landlord. The Indiana Moisture Assessment Form lists moisture conditions that exist in the home at the time of initial audit before any weatherization measures were installed. The conditions must also be confirmed by the shell crew/contractor prior to performing their work. This form must be present in every file in compliance with DOE Program Guidance 05-1.

Testing:

Visual assessment is required and diagnostics, such as moisture meters, are recommended at initial audits and prior to final inspections. Mold testing is not an allowable cost.

Client Education:

Solutions for mold remediation and educational talking points are discussed with the homeowner and/or occupants to determine roles in creation of problems and/or mitigation. Occupants are given a copy of the Environmental Protection Agency (EPA) brochure, "A Brief Guide to Mold, Moisture, and Your Home" as part of the client education process.

Training:

Each sub-grantee's crews or contractors receive specialized training in moisture awareness, ventilation, indoor air quality, and mold hazards. A mold awareness course is offered by the training and technical service provider and teaches Weatherization technicians and auditors how to identify the conditions that promote mold growth. This class identifies treatment options for less extensive mold conditions and best Weatherization practices to prevent mold growth. This class also discusses the health aspects related to mold and moisture issues for both workers and clients. This course is intended to prepare technicians and auditors to know how to safely proceed with Weatherization services or when to defer the home until serious mold and moisture conditions have been eliminated.

Occupant Preexisting or Potential Health Conditions

Action/Allowability:

When a person's health may be at risk and/or the work 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 actions must result in deferral.

Testing:

Auditors must require the client to reveal known or suspected health concerns as part of initial application for weatherization. Auditors must screen

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occupants again during the audit.

Client Education:

Auditors provide clients information of any known risks.

Training:

Auditors are trained on how to assess a client's preexisting conditions and determine what action to take if the home is not deferred. They are also trained on awareness of potential hazards.

Occupational Safety and Health Administration (OSHA) and Crew Safety

Action/Allowability:

Workers must follow OSHA standards and Material Safety Data Sheets (MSDS) and take precautions to ensure the health and safety of themselves and other workers. MSDS must be posted wherever workers may be exposed to hazardous materials.

Testing:

Sub-grantees must perform assessments to determine if crews are practicing and utilizing safe work practices.

Client Education:

Not applicable.

Training:

The OSHA 10 hour training is required for all weatherization workers. The OSHA 30 hour training is required for all crew leaders and HVAC personnel working alone. All new weatherization workers must receive the appropriate OSHA training within six months commencing 45 days from the date of hire.

Pests

Action/Allowability:

Pest removal is cause for deferral unless other funds are available to cover the cost of extermination.

Testing:

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

Client Education:

Auditors will inform clients of the observed condition and associated risks.

Training:

Auditors are trained in how to assess the presence and degree of infestation, associated risks, and need for deferral.

Radon

Action/Allowability:

Whenever site conditions permit, exposed dirt must be covered with a vapor barrier. In homes where radon may be present, precautions should be taken to reduce the likeliness of making radon issues worse. Radon abatement is not an allowable activity with DOE funds; major radon problems are deferred and referred to the appropriate local environmental agency.

Testing:

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Radon testing is not currently required by IHADA.

Client Education:

Auditors discuss the potential existence of radon with the clients where appropriate.

Training:

Auditors are trained on what radon is, how it occurs, what factors might make it worse, and what weatherization measures can be helpful to radon control. Crews and contractors are trained in vapor barrier installation.

Refrigerant

Action/Allowability:

Sub-grantees may reclaim refrigerant per the Clean Air Act of 1990. Section 608, as amended by 40 CFR 82, 5/14/1993.

Testing:

Auditors or contractors use EPA testing protocols.

Client Education:

Clients are instructed not to disturb refrigerants.

Training:

Auditors and contractors are trained on the EPA-approved section 608 type I or universal certification.

Smoke and Carbon Monoxide Alarms and Fire Extinguishers

Action/Allowability:

The installation of smoke and carbon monoxide alarms is an allowable expense with DOE funds where alarms are not present or inoperable. Replacement of operable smoke and/or carbon monoxide alarms is not an allowable cost.

Testing:

Auditors will check existing smoke and carbon monoxide alarms for operation.

Client Education:

Auditors will provide the client with verbal and written information on the use of smoke and carbon monoxide alarms and fire extinguishers where allowed.

Training:

Auditors, crews, and contractors are trained on where to install smoke and carbon monoxide alarms.

Solid Fuel Heating (wood stoves, etc)

Action/Allowability:

Maintenance, repair, and replacement of primary indoor heating units is allowed where a client's health and safety is a concern.

Testing:

Auditors must complete the solid wood fuel inspection form as part of their audit. This form is located in Indiana's 2011 Weatherization Field Guide, Chapter 4 and page 4-92.

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Client Education:

Auditors provide clients with safety information including recognizing depressurization.

Training:

Auditors are trained on how to perform a CAZ depressurization test and conduct a proper inspection of solid fuel heating systems.

Space Heaters, Stand Alone Electric

Action/Allowability:

Repair, replacement, or installation of electric stand alone space heaters is not allowed. Removal of these space heaters is recommended. The energy auditor is required to perform a complete evaluation of the heating system on each home weatherized. Part of this evaluation will be determining what modifications or replacements are required. Stand alone electric heaters cannot be left in place as a client's sole source of heat. If provisions cannot be made for the installation of a permanent heating source, the home must be deferred. In instances where a new heating system is installed, the client will be educated on the new heating system and advised against using the stand alone electric space heater. Should the stand alone electric space heater be found to be unsafe for use in the client's home, it must be removed from use prior to weatherization proceeding.

Testing:

Auditors check overall electrical safety of the home as part of their initial audit process.

Client Education:

Auditors must inform the client of hazards associated with the use of standalone electric space heaters and collect a signed waiver if removal is not allowed by the client.

Training:

Auditors are trained to be aware of this guidance.

Space Heaters, Unvented Combustion

Action/Allowability:

Removal of unvented combustion space heaters is required, except as an emergency heat source as allowed by DOE WPN 08-4. Unvented space heaters are only allowed to remain in the home when meeting all requirements as outlined in the Unvented Gas Space Heater Inspection Form, Appendix L, IHCD's Policy and Procedure Manual. This form must be completed and placed in the client file where either an unvented space heater was removed or remains in the home.

Testing:

Carbon monoxide testing, combustion air requirements and completion of the Unvented Gas Space Heater Inspection Form are required.

Client Education:

Auditors must inform clients of the dangers of unvented space heaters and specifically the dangers of carbon monoxide and moisture production.

Training:

Auditors are trained on the dangers of unvented space heaters and how to perform air-free carbon monoxide tests.

Space Heaters, Vented Combustion

Action/Allowability:

Vented gas combustion space heaters are an acceptable source of heat and must be tested the same as gas furnaces. Replacements, where necessary,

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follow the same guidelines as gas furnaces.

Testing:

Auditors must test vented space heaters in the same manner as a gas furnace and complete Indiana's Gas Appliance Inspection Form.

Client Education:

Auditors inform clients of the work performed to their space heaters, safe and efficient operating tips, and maintenance issues.

Training:

Auditors are trained on appropriate testing, operation and venting requirements for vented space heaters.

Spray Polyurethane Foam

Action/Allowability:

Use of two-part foam is acceptable where all applicable EPA, OSHA and IHEDA requirements are followed.

Testing:

Auditors determine the most appropriate use for two-part foam based upon pricing, cost effectiveness and conditions in the home.

Client Education:

Auditors notify the client of the plans to use two-part foam and the precautions that may be necessary.

Training:

Auditors, crews and contractors are trained on the proper use, application and safety concerns for two-part foam.

Ventilation

Action/Allowability:

ASHRAE 62.2 is required to be met to the fullest extent possible. Implementing ASHRAE 62.2 is not required where acceptable indoor air quality already exists as defined by ASHRAE 62.2 or where ASHRAE 62.2 requires a threshold of 15 cfm or less of continuous ventilation. For the 15 cfm threshold to be allowed, the home must have existing, operable local exhaust and no moisture or indoor air quality issues. The above criteria is determined and verified by the completion of Indiana's ASHREA 62.2 calculation form and Indiana's Moisture Assessment Findings form. Both of these forms are required to be completed for each home and a copy placed in the client file.

Testing:

Each home is evaluated to meet the ASHRAE 62.2 standard at the initial audit. Fans installed as a result of ASHRAE 62.2 are tested for proper flow and adjusted to meet blower door readings at the time work is completed.

Client Education:

Auditors will provide clients with information on function, use, and maintenance of ventilation systems and components. Auditors will include a disclaimer that ASHRAE 62.2 does not account for high polluting sources or guarantee indoor air quality.

Training:

Auditors are required to complete ASHRAE 62.2 training which includes evaluation of existing and new systems, depressurization tightness limits, critical air zones, moisture assessments and completion of Indiana's ASHRAE 62.2 calculation form. Indiana's ASHRAE 62.2 training curriculum includes proper fan selection, operational controllers (timers and switches), fan settings, and client education.

Window and Door Replacement, Window Guards

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Action/Allowability:

Replacement, repair, or installation of windows and doors is not an allowable health and safety expense but may be allowed as an incidental repair in Base Program Operations on a case-by-case basis if considered when running NEAT and MHEA and the measure is cost justified. When incidental repair dollars are used for the installation of windows or doors, clear documentation must be present in the client file as to why this decision was made and what conditions were that led to this work being necessary. Required documentation can include but not be limited to: pre and/or post digital photographs, written documentation of the energy auditor's observations at the initial audit, or Moisture Assessment Form notations indicating these measures were necessary for the weatherization services to proceed. IHEDA strongly discourages the installation of doors and windows in Indiana's Weatherization Assistance Program.

Testing:

Not applicable.

Client Education:

Not applicable.

Training:

Auditors are trained on the proper application of incidental repairs, the proper use of NEAT/MHEA and how to recognize the most fitting energy efficient measures for each home weatherized.

V.8 Program Management

V.8.1 Overview and Organization

The Indiana Weatherization Assistance Program is administered by the Indiana Housing and Community Development Authority (IHEDA). IHEDA is a quasi-governmental agency that administers numerous programs including the Low-Income Housing Tax Credit program, First-Time Home Buyer Assistance, Community Development Block Grant, HOME Investment Partnership funds, Emergency Shelter Grant, Low-Income Household Energy Assistance Program, Community Service Block Grant, and Neighborhood Stabilization Program, among others. IHEDA is located within the Family of Business of the Indiana Lieutenant Governor's Office.

Twenty-three (23) sub-grantees administer the Weatherization Assistance Program (WAP). The territory once served by ACTION, Inc. (Grant and Delaware Counties) was being covered by Interlocal Community Action Program (ICAP). During 2012, IHEDA performed an RFP process to permanently award this service territory. As a result of the RFP process, IHEDA awarded Grant County to Job Source (DBA CICAP) and Delaware County to ICAP. The awarding of these counties became effective April 1, 2013. Twenty-one (21) sub-grantees are Community Action Agencies, one (1), People Working Cooperatively, is a nonprofit agency, and one (1), Job Source,(DBA CICAP) is a unit of local government.

V.8.2 Administrative Expenditure Limits

IHEDA allocates up to seven percent (7%) of its total grant award for sub-grantee administration. Each sub-grantee's administrative expenditure limit is set proportionally; that is, each sub-grantee's administration line item is based on the sub-grantee's share of the total weatherization funding available for production.

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V.8.3 Monitoring Activities

IHCDA has one monitor who spends 100% of his time monitoring on the DOE grant. IHCD's Community Programs Manager oversees and supports both the monitor and contracted staff. In addition to field inspections, IHCDA visits each sub grantee for programmatic and fiscal reviews at least once per program year. All monitoring is performed in real time; that is, monitoring will keep pace with sub grantee production during the course of a grant year. IHCDA's monitoring process includes performing In-Progress site visits. The primary purpose of monitoring visits is to assist the sub grantee in providing high quality energy conservation services to low-income homes. Monitoring also provides compliance review and information sharing which results in:

- High quality, comprehensive weatherization services provided consistently throughout the state;
- Healthy, safe, and energy efficient housing improvements to low-income households;
- Effective and verifiable program accountability and efficiencies and
- Innovative technological advances.

Specifically, monitors carry out the following:

- Production Management
 - o Determine if the sub-grantee employs enough staff and subcontractors to complete the established production goals, review whether the sub-grantee is using trained staff to perform various job functions, monitor sub-grantee production rate towards meeting quarterly benchmarks, review the use of subcontractors to determine compliance with job function certification and competency requirements, and review compliance with the priority protocol for site built or mobile homes.
- Client File Review
 - o Verify that clients receiving weatherization services are income eligible, make sure the subgrantee documents services provided to the client and all costs associated with the completion of those services; and,
 - Complete the Client File Review worksheet from files pulled at random from sub-grantee records. This activity includes:
 - o Verifying income eligibility, ensuring program eligibility for duration of weatherization work, checking job costs, ensuring proper technical readings from diagnostic tests appropriate to the dwelling type are carried out, checking that all appropriate forms (mold and moisture assessment, release of liability, final inspection form, work order, and job invoices) are present and signed.
- Field Inspections
 - o Conduct on-site inspections of at least 5% of dwellings completed by each sub-grantee and pulled from the file review to ensure that weatherization services are provided in a professional and workmanlike manner and in compliance with all standards, regulations and policies set forth by IHCDA. The field inspection includes testing base load measures installed, air sealing, insulation, CAZ testing, pressure diagnostics testing, duct sealing, and any/all other applicable diagnostics;
 - o Ensure that the final inspection, which is completed by subgrantees, attests to the level of quality, professionalism, and appropriateness of the measures installed;
 - o Verify that the measures performed were effective, appropriate, and properly invoiced; and
 - o Provide guidance for improving the delivery of services.

Administration Reviews

- o Review the processes of the sub-grantee's weatherization program for compliance and efficiency and review the processing of weatherization claims and payment through the sub-grantee's fiscal department for timeliness and correctness.

At the end of each monitoring visit, an exit conference is held between members of the sub-grantee's management team and the monitor to discuss the findings, concerns, and suggestions the monitor discovered during their visit. The exit conference allows sub grantee staff and the

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monitor to discuss informally what will be included in the letter generated as a result of monitoring. A written report documenting all findings, concerns, and suggestions will be sent to the sub grantee within 30 business days of the exit conference. Sub grantees will have 15 business days to respond in writing to the monitoring report. Failure by the sub grantee to respond in writing during the 15 business day period will result in all claims being held until receipt of response. Sub grantees with a significant number of findings, or findings that indicate significant program deficiencies are prescribed a Quality Improvement Plan (QIP) (See III.1.2). Sub-grantees will be released from their QIP once monitors and IHCD program management judge the remediation plan as completed and outstanding issues as resolved.

V.8.4 Training and Technical Assistance Approach and Activities

In addition to the aforementioned compliance monitoring, all professional service contractors and dedicated monitors from IHCD provide training and technical assistance (T&TA) for sub-grantees. The purpose of T&TA is to provide sub-grantees with additional technical assistance in the technical and administrative aspects of the IWAP Program. IHCD's monitors and staff are available daily via phone and/or email to answer programmatic questions. Sub-grantees with more serious needs may schedule an on-site visit from the respective professional service contractor or IHCD staff. Training staff from the contracted training and technical assistance provider are also available to provide T&TA assistance by phone, email, or on-site visits.

Additional T&TA activities anticipated to take place in Indiana during the 2013-2014 DOE grant cycle include the following:

1. NEAT and MHEA training provided by NREL
2. NEAT and MHEA follow-up training provided by the Indiana Community Action Association (INCAA)
3. National DOE Quality Assurance Inspector certification instruction and testing activities
4. Lead Based Paint Renovator Refresher Training
5. Indiana Competency Maintenance Training
6. Program Management and Financial Training for Weatherization Sub Grantees
7. Preparation for Implementation of Ashrae 62.2 2013 Updates
8. Participation by IHCD Staff in the DOE Planning Meeting in Denver, CO and the NASCSP Conference in Phoenix, AZ

V.9 Energy Crisis and Disaster Plan

The current provision for re-weatherization allows for repair to damage to weatherization materials not paid for by insurance in the event a dwelling unit is damaged by fire, flood, or other accident. To date, Indiana utilized this provision without any other special considerations. Weatherization Program Notice 08-5 allows for the expansion of the existing re-weatherization provision to include opportunities when disastrous situations occur.

This plan allows IHCD and its sub-grantees to use weatherization resources to assist with disaster-related activities in the event a Federal or State Emergency is declared by Presidential or Gubernatorial order. The crisis can be naturally occurring or manmade. Disaster mitigation activities shall be implemented as soon as practical after a disaster; however, sub-grantees may not commit weatherization resources (labor or financial) until approved by IHCD. Weatherization funds allocated for disaster assistance must supplement, not supplant, other funds available.

The weatherization network will respond to the crisis by addressing the needs of the affected low-income clients, but taking into consideration the limited funds available in weatherization. This disaster response plan will chart the weatherization network's mitigation efforts through the crisis itself, clean up, and rebuilding efforts.

1. The Crisis:

These actions will take place immediately after a crisis or when the threat of a crisis becomes imminent and with approval from IHCD. They should be applied as appropriate to the situation. Sub-grantees should contact and coordinate relief with the appropriate disaster site leadership. Each affected sub-grantee shall have on-file an up-to-date list of contacts to federal, state, and local crisis response organizations. This might include, but is not limited to:

- Federal Emergency Management Agency (FEMA): Region V Recovery and Response Divisions
(<http://www.fema.gov/about/regions/regionv/index.shtm#who>)
- Indiana Department of Homeland Security (DHS): County Emergency Management Directors
(http://www.in.gov/dhs/files/sanitized_compact_directory.pdf)
- County-level emergency management agencies
- City-level emergency management agencies

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In the event of a crisis, weatherization network staff should contact the agencies above and explain the role and resources that weatherization can provide. In the event a crisis is imminent (example: flood), local weatherization staff may suspend weatherization work to prepare for the crisis (example: filling sandbags).

2. Clean-Up:

Weatherization work may be suspended during the early clean-up phase until basic community services, such as electricity, water, food, and medical supplies can be returned closer to normal and agency weatherization employees are encouraged to participate in normalization activities, such as debris removal, distribution of essential items, etc. After the early stages of clean up, grantees must ensure the focus of any additional effort is primarily on the interests of low-income households and residents.

3. Rebuilding:

Sub-grantees must ensure the following eligibility requirements:

- Applicants for disaster assistance meet current income eligibility requirements and their homes must be within the designated disaster area and
- The applicant's home must be habitable.

Disaster-damaged homes may be re-weatherized--regardless of the initial weatherization date-- if the damage is not covered by insurance. Sub-grantees may engage in rebuilding activities outside the scope of standard weatherization practices that include:

- Debris removal and other clean-up work in preparation for weatherization activities with DOE approval;
- Increased incidental and repair costs to facilitate weatherization (not to exceed \$1,000 on any home);
- With DOE approval, increase the health and safety allocation to 25% to abate crisis damage; and
- Window and door replacement, as necessary.

IHCDA Crisis Responsibilities are as follows:

- Notify the appropriate DOE Project Officer upon hearing of the crisis need
- Draft and submit an event-specific disaster response plan
- Ensure that weatherization production continues in areas that were not declared a disaster area and
- Monitor, track, and report the impacts of relief work as it relates to weatherization