



State of Kansas Weatherization State Plan Application 2016

Kansas Housing Resources Corporation
611 S. Kansas Avenue, Suite 300
Topeka, KS 66603-3803
(785) 217-2001 / FAX (785) 232-8084
www.kshousingcorp.org



Application for Federal Assistance SF-424

*1. Type of Submission:

- Preapplication
 Application
 Changed/Corrected Application

*2. Type of Application: * If Revision, select appropriate letter(s):

- New
 Continuation *Other (Specify): _____
 Revision

* 3. Date Received:

1/8/16

4. Applicant Identifier:

5a. Federal Entity Identifier:

*5b. Federal Award Identifier:

DE-EE0006155

State Use Only:

6. Date Received by State: 1/8/16

7. State Application Identifier: 2016 DOE Grant

8. APPLICANT INFORMATION:

*a. Legal Name: KANSAS HOUSING RESOURCES CORPORATION

*b. Employer/Taxpayer Identification Number (EIN/TIN):

710950729

*c. Organizational DUNS:

137043662

d. Address:

*Street 1: _____ 611 S Kansas Avenue _____

Street 2: _____ Suite 300 _____

*City: _____ Topeka _____

County/Parish: _____ Shawnee County _____

*State: _____ Kansas _____

Province: _____

*Country: _____ U.S.A _____

*Zip / Postal Code: _____ 666033803 _____

e. Organizational Unit:

Department Name:

Housing w/ Supportive Services

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: _____ *First Name: _____ Alfanzo _____

Middle Name: _____

*Last Name: _____ Dorsey _____

Suffix: _____

Title: _____ Housing w/ Supportive Services Director _____

Organizational Affiliation:

*Telephone Number: (785)217-2043

Fax Number: 785-232-8084

*Email: _____ adorsey@kshousingcorp.org _____

Application for Federal Assistance SF-424

9. Type of Applicant 1: Select Applicant Type: State Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

*Other (Specify)

***10 Name of Federal Agency:**

U.S. Department of Energy

11. Catalog of Federal Domestic Assistance Number:

81.042 Weatherization Assistance for Low-Income Persons

CFDA Title:

***12 Funding Opportunity Number:**

DE-WAP-0002016

*Title:

2016 Weatherization Assistance Funding Opportunity

13. Competition Identification Number:

Title:

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

State of Kansas

***15. Descriptive Title of Applicant's Project:**

The Weatherization Assistance Program enables low-income families to permanently reduce their energy bills by making their homes more energy efficient. During the past 39 years, the U.S. Department of Energy's (DOE) Weatherization Assistance Program has provided weatherization services to more than 7 million low-income families.

Application for Federal Assistance SF-424

16. Congressional Districts Of:

*a. Applicant: Kansas Congressional District 02	*b. Program/Project: KS-Statewide
Attach an additional list of Program/Project Congressional Districts if needed.	
17. Proposed Project:	
*a. Start Date: 07/01/2016	*b. End Date: 06/31/2017
18. Estimated Funding (\$):	
*a. Federal	\$ \$2,360,701.00
*b. Applicant	\$ _____
*c. State	\$ _____
*d. Local	\$ _____
*e. Other	\$ _____
*f. Program Income	\$ _____
*g. TOTAL	\$ \$2,360,701.00
*19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on _____	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
*20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach.	
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U. S. Code, Title 218, Section 1001)	
<input checked="" type="checkbox"/> ** I AGREE	
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
Authorized Representative:	
Prefix: _____ Mr. _____	*First Name: _____ Dennis _____
Middle Name: _____ L _____	
*Last Name: _____ Mesa _____	
Suffix:	
*Title: Executive Director	
*Telephone Number: (785)217-2001	Fax Number: (785)232-8084
* Email: dmesa@kshousingcorp.org	
*Signature of Authorized Representative: Signed Electronically	*Date Signed:

U.S. DEPARTMENT OF ENERGY
GOLDEN FIELD OFFICE



BUDGET EXPLANATION PAGE FOR FORMULA GRANTS

Please provide detailed information to support each Cost Category using this form or attach a breakdown of costs using your own format as Attachment A.

1. **PERSONNEL**

Position and Description of Duties

Housing With Supportive Services Director (HwSS): Coordinates the Housing with Supportive Services Division of the Kansas Housing Resources Corporation, including the Weatherization Assistance Program, the Community Services Block Grant Program, and the Emergency Solutions Grant Program. Responsibility includes management and internal control for budget preparation and budget review, contracts and amendments, payments, refunds, and recoupment.

Weatherization Program Manager: Develops and manages the annual WAP State Plan and T&TA plan; monitors the local Weatherization Assistance Program at the Subrecipient level; provides technical assistance to the HwSS Director and Deputy in issues regarding program management; establishes pre-inspection procedures and work standards; maintains Policy and Procedures Manual; visits Subrecipient agencies and monitors compliance with operations procedure, tracks program activities; tracks resolution of monitoring findings, and assists in program reporting.

Deputy Division Fiscal Officer: Provides fiscal monitoring of grants; reviews Subrecipient budgets for compliance and develops department budget; provides fiscal management; develops fiscal spreadsheets and provides fiscal leadership of operations including the fiscal components of the Weatherization Assistance State Plan. Develops program reports and reviews Subrecipient reports. Assists in planning and program development.

Administrative Specialist: Provides clerical support for the K-WAP, the HwSS Director, the WAP Program Manager, and the Deputy Division Fiscal Officer. Reviews payment invoices and prepares them for payment; assists in developing local WAP budgets; assists with revisions to policy and procedural manuals; completes WAP program reports; assists in management of the Weatherization Management System and associated data input. Assists in planning and program development. Maintains files and logs, develops spreadsheets and enters data, as needed.

Weatherization Field Specialist: Provides technical support for the Weatherization Assistance Program; visits Subrecipient agencies, inspects completed and in progress jobs; monitors the technical aspect of the program at the Subrecipient level for compliance; identifies need and provides training and technical assistance across the program; assists in maintaining procedures and field manuals, tracks training and continuing education plans.

2. FRINGE BENEFITS

- a. Are the fringe cost rates approved by a Federal Agency? If so, identify the agency and date of latest rate agreement or audit below, and include a copy of the rate agreement.

N/A

- b. If a. above does not apply, indicate the basis for computation of rates, including the types of benefits to be provided, the rate(s) used, and the cost base for each rate. You may provide the information below or provide the calculations as an attachment.

<u>Description of Benefits</u>	<u>2016 Rates</u>
KPERS	.1091
FICA	.0765
Workers Compensation	.0023
Unemployment Insurance	.001
KPERS Death/Disability Insurance	.00748
KHRC Employee Parking provided (annual)	\$600.00
Health Insurance/Single coverage (per month)	\$593.28
Health Insurance/Family Coverage (per month)	\$1039.26
Longevity Pay (<i>after 10 years service</i>)	\$50/Year

(Percentage/amounts based on State's/KHRC's FY 2016 rates)

3. TRAVEL

Identify total Foreign and Domestic Travel as separate items.

a. Indicate the estimated number of trips, point of origin, destination, and purpose of travel.

<u>Purpose of Travel</u>	<u>Estimated Number of Trips</u>	<u>Estimated Cost</u>	<u>Total</u>
Monitor program compliance for fiscal and operational procedures; Inspect completed units at each agency. Provide on-site T&TA related to monitoring findings and other issues as requested by Subrecipients.	48	\$360	\$17,280
Quarterly Weatherization Director Meetings. Rotating Subrecipient agencies. 4 staff members.	16	\$374	\$5,984
Provide on-site T&TA on various issues, as requested by Subrecipients as identified by staff. 1 staff member	14	\$500	\$7,000
CAPLAW Training	1	\$2,500	\$2,500
DOE conference/ meeting. 3 staff	3	\$2,500	\$7,500
Kansas State Housing Conference, program and fiscal training. 3 staff members	3	\$1,500	\$4,500
NASCSP Annual Conference. NASCSP training/development conference. 2 trips 2 staff members	4	\$2,250	\$9,000
Quality Control Inspector Training	1	\$2,563	\$2,563
Inspectors Meetings – 2 meeting, 2 staff members	4	\$1350	\$5,400
Energy Out West - 2 staff	2	\$2,250	\$4,500
TOTAL:			\$66,227

b. Specify the basis for computation of each type of travel expense (e.g., current airline ticket quotes, past trips of a similar nature, federal government or organization travel policy, etc.).

Expenses are based on historical cost, computed at approved state travel rates. Out-of-state travel is planned at approximately \$2,500 per person, based on average estimated expense.

4. EQUIPMENT - As defined at 2 CFR 200.33, "Equipment"

- a. Provide the basis for the equipment cost estimates (e.g., vendor quotes, prior purchases of similar or like items, etc.).

All purchases are made on state contract or through state purchasing procedures. Our estimates are based on historical vendor quotes.

- b. Briefly justify the need for items of equipment to be purchased.

5. MATERIALS AND SUPPLIES - As defined at 2 CFR 200.94, "Supplies"

- a. Provide the basis for the material cost estimates (e.g., vendor quotes, prior purchases of similar or like items, etc.).

All purchases are made on state contract or through state purchasing procedures. Our estimates are based on historical vendor quotes.

Printed Materials, Training Supplies, Postage	\$5,500
General Office and Data Processing Supplies	\$23,000

- b. Briefly justify the need for items of materials to be purchased.

Historical experience.

6. CONTRACTS AND SUBGRANTS – All other participant costs including subcontractor sub-grants, and consultants.

- a. For proposed contractors/Subrecipients provide the following:

<u>Contractor/Subrecipient</u>	<u>Work Description</u>
ECKAN	Weatherization: 14 counties
SEK-CAP	Weatherization: 10 counties
Community Action	Weatherization: 8 counties
Interfaith Housing Services	Weatherization: 25 counties
NCRPC	Weatherization: 35 counties
SCKEDD	Weatherization: 13 counties

7. OTHER COSTS

- a. Provide the basis for the cost estimates (e.g., vendor quotes, prior purchases of similar or like items, etc.).

State office space requirements	\$14,000
Agency Audit	\$3,000
Insurance	\$8,250
Professional Fees and Services	\$4,500
Administrative Salaries, Benefits and Operating expenses	\$42,000

All costs included in Other Direct Costs are properly segregated to ensure there are not duplicate charges.

All costs proposed are only being used in support of the WAP program.

- b. Briefly justify the need for each cost item proposed.

Historical experience used as a basis of cost.

8. INDIRECT COSTS

- a. Are the indirect cost rates approved by a Federal Agency? If so, identify the agency and date of latest rate agreement or audit below, and include a copy of the rate agreement.

N/A

- b. If a. above does not apply, indicate the basis for computation of rates, including the types of benefits to be provided, the rate(s) used, and the cost base for each rate. You may provide the information below or provide the calculations as an attachment.

N/A

IV. WEATHERIZATION ANNUAL FILE

IV.1 SUBRECIPIENTS

Allocation of funds to Subrecipients and across budget categories will be calculated on the base formula as available from KHRC. The base formula is based on the 2010-2014 American Community Survey 5-year Estimates. KHRC retains the right to actively manage the grant and move funds as necessary to fully expend the monies during the budget period.

Subrecipient Agency	Type of Organization	Tentative		Congressional District
		Allocation	Units	
Community Action, Inc. 1000 SE Hancock Topeka, KS 66607-1578 (Contractors)	Local Community Action Agency	\$244,157.00	27	Dist. 2, 100%
East Central Ks Economic Opportunity Corporation P.O. Box 40, 1320 S. Ash Street, Ottawa, KS 66067-0040 (Contractors)	Local Community Action Agency	\$629,582.00	75	Dist. 1, 21% Dist. 2, 37% Dist. 3, 21% Dist. 4, 21%
Interfaith Housing Services, Inc 1326 East Avenue A; PO Box 1987 Hutchinson, Kansas 67504-1987 (Contractors)	Nonprofit Organization	\$174,544.00	19	Dist. 1, 84% Dist. 4, 16%
North Central Regional Planning Commission P.O. Box 565, 109 North Mill Beloit, KS 67420-0565 (Contractors)	Unit of Local Government	\$244,361.00	27	Dist. 1, 97% Dist. 2, 3%
South Central Ks Economic Development District 200 West Douglas, Suite 710 Wichita, KS 67202-4012 (Contractor and Crew)	Nonprofit Organization	\$569,564.00	69	Dist. 1, 23% Dist. 4, 77%
Southeast Kansas Community Action Program P.O. Box 128, 401 N. Sinnet Girard, KS 66743-0128 (Contractor and Crew)	Local Community Action Agency	\$179,239.00	21	Dist. 2, 100%
TOTAL ESTIMATED COST AND UNITS		\$2,041,447.00	238	

IV.2 WAP PRODUCTION SCHEDULE

	Annual Total
Weatherized Units (TOTAL)	238
Reweatherized Units	0

Vehicles and Equipment \$5,000 or more Average Cost per Dwelling Unit (DOE Rules)

A. Total of Vehicles and Equipment (\$5,000 or more) Budget	\$0.00
B. Total Units to be Weatherized, from Production Schedule above	238
C. Units to be Reweatherized, from Production Schedule above	0
D. Total Units to be Weatherized, plus Planned Reweatherized Units from Production Schedule above (B plus C)	238
E. Average Vehicles and Equipment Cost per Dwelling Unit (A divided by D).....	\$0.00

Average Cost per Dwelling Unit (DOE Rules)

F. Total of Funds for Program Operation	\$1,427,298.00
G. Total Units to be Weatherized, plus Planned Reweatherized Units from Production Schedule above (total from D above)	238
H. Average Program Operations Costs per Unit (F divided by G)	\$5,997.05
I. Average Vehicles and Equipment Acquisition Cost per unit (total from E)	\$0.00
J. Total Average Cost per Dwelling Unit (H plus I)	\$5,997.05

The PY 2016 average expenditure limit is \$7,105 per Weatherization Program Notice 16-1, effective date of December 31, 2015 and shall be the maximum average expenditure allowed. For planning purposes, and average of \$6,000 will be used which is closer to historical state averages.

IV.3 ENERGY SAVINGS

K-WAP will utilize the DOE algorithm to estimate energy savings for 2016. The DOE algorithm is based on the most recently published evaluation of the Weatherization Assistance Program, specifically the report “Weatherization Works- Summary of Findings from the Retrospective Evaluation of the U.S. Department of Energy’s Weatherization Assistance Program”, ORNL/TM-2014/338, which estimates annual savings of 29.3 MBtu per year for natural gas heated homes. The study includes site-built weatherized homes nationwide (which include single-family homes and buildings with 1-4 units, but excludes mobile homes and large multifamily). This value is representative of the total energy savings expected from weatherization for an average house from the fuel used for space heating (natural gas, propane, fuel oil, and electricity), which may include water heating too, and the source value of the electricity savings for the home (from space heating, space cooling, water heating, lighting, refrigerators, etc.).

DOE Program	Amount	Line
Total Estimated Homes to be Weatherized	238	(a)
Multiply (a) by 29.3 MBtu for Total Annual Estimated Energy Savings resulting from DOE appropriated funds	6973.4 MBtu	(b)

IV.4 DOE-FUNDED LEVERAGING ACTIVITIES

For the current Program Year, KHRC will not be engaging in any DOE funded leveraging activities.

Other Funding Sources

For the current Program Year, KHRC will receive 15 percent of the State of Kansas LIEAP allocation. The LIEAP funds are used according to DOE rules, with the exception of the eligible income level, the average cost, and additional measures as identified in the Weatherization Subrecipient’s Procedures Manual. (Revision date: 2016)

IV.5 POLICY ADVISORY COUNCIL

The purpose of the Policy Advisory Council (PAC) is to serve in an advisory capacity to the Kansas Housing Resources Corporation in the administration and development of the Weatherization Assistance Program. PAC members assist the program by bringing special qualifications, professional and personal networking, and sensitivity with respect to solving the problems of low-income persons across the state. Membership can include organizations, agencies, programs, and individuals that broadly represent low-income persons within our target populations.

The K-WAP is assisted by the Kansas Weatherization Policy Advisory Council. The members of the Council are as follows:

Name & Mailing Address

Lewis Kimsey
Constituent Affiliation - KDCF/LIEAP
(serving all low-income citizens of Kansas,
including elderly, handicapped, and Native
Americans)
915 SW Harrison, Suite 580
Topeka, KS 66612

Elena Hill
Constituent Affiliation – KCP&L (utility company,
representing energy users)
1200 Main Street
Kansas City, MO 64105

David Hart
Constituent Affiliation - Ks Dept of Health and
Environment
327 N. Hillside, Suite 300
Wichita, KS 67214

Gary Brunk
Constituent Affiliation – Representing low to
moderate income families including: elderly,
handicapped, and Native Americans.
KACAP
621 SE Swygart St.
Topeka, KS 66607

Larry Bentley
Constituent Affiliation – Retired, KHRC WAP
Manager
709 Prospect,
Osage City, KS 66523

Season Dominguez
Constituent Affiliation – Representing low income
Native Americans.
Prairie Band Potawatomi Nation
8273 156th Lane,
Mayetta, KS 66509

IV.6 HEARING AND TRANSCRIPTS

On January 21, 2016, Weatherization Grantee and Subrecipient Directors attended the quarterly Weatherization Director’s Meeting. A key agenda item was the development of the 2016 State Plan Application. All Subrecipients were in attendance either in person or by phone.

Weatherization Subrecipients and PAC members were emailed the draft proposal and a meeting with these stakeholders was held on April 14th and April 21st to discuss the proposed changes to the State Plan.

The Kansas Register ran the Notice for Public Hearing on April 14 and 21, 2016. The Public Hearing was held on April 26, 2016. The Public Hearing transcript is attached. No additional comments were received.

IV.7 MISCELLANEOUS

“Recipient Business Officer”: Alfanzo Dorsey, 785-217-2043, adorsey@kshousingcorp.org

“Recipient Principal Investigator”: Jeanette Spurgin, 785-217-2047, jspurgin@kshousingcorp.org

V. WEATHERIZATION MASTER FILE

V.1 ELIGIBILITY

V.1.1 Approach to Determining Client Eligibility

Definition of income used to determine eligibility:

Renters or homeowners whose income is at or below 200 percent of the poverty level, determined in accordance with criteria established by the Director of the Office of Management and Budget, shall be eligible for weatherization assistance in Kansas. In addition, households which contain a member who has received cash assistance payments under Title IV or XVI of the Social Security Act or applicable state or local law during the 12-month period preceding the determination of eligibility for weatherization assistance shall be eligible for weatherization assistance.

Household Eligibility:

A dwelling unit shall be eligible for weatherization assistance if it is occupied by an eligible family unit whose income is at or below 200 percent of the poverty level and the structure is eligible as outlined in V.1.2 Approach to Determining Building Eligibility.

Qualified Aliens Eligibility for Benefits:

Subrecipients shall ensure that DOE weatherization services shall only be provided to eligible populations. All clients files will contain an Alien Certification form as found in the Kansas Subrecipient Procedures Manual.

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation:

The applicant must provide evidence or income documentation satisfactory to the outreach worker that the household meets the eligibility requirements. The documentation must be maintained in the client file and made available for inspection by the agency employee and state staff. Applicant income must be verified for the one-year period prior to the certification month. In accordance with DOE Weatherization Program Notice 16-3, income data for a part of a year may be annualized in order to determine eligibility—for example, by multiplying by four the amount of income received during the most recent three months. The method of calculation is to be determined by the Subrecipient in accordance with WPN 16-3 and the Subrecipient Procedures Manual and should be uniformly applied. Tax forms may be used to verify income only if the certification period is from January through December. Applications on file for one year or more must be recertified for the year prior to pre-inspection. Applicant eligibility verification shall be documented in the file and shall include, as a minimum, (1) which 12-month period was considered, (2) a list of all sources of applicant income, (3) documentation of income from each source for the period(s) being considered, and (4) the date and initials of the agency employee verifying income.

Reweathering:

No dwelling unit may be weatherized (1) which is designated for acquisition or clearance by a federal, state or local program within 12 months from the date weatherization would be scheduled to be completed; or (2) which has been weatherized since September 30, 1994. An exception is allowable for a unit, which has been weatherized since September 30, 1994, if it has been damaged by fire, flood or act of God and repair of the damage to weatherization materials was not covered by insurance.

Dwelling units partially weatherized under this program or under other federal programs during the period September 30, 1975 through September 30, 1994 may receive further assistance for weatherization. Homes which are eligible for reweatherization under 10 CFR 440.18(e) (2) may be reweatherized at the discretion of the Subrecipient weatherization director. Subrecipients are instructed not to repeat weatherization measures which were previously completed unless those measures are no longer effective. All reweatherized units must meet current weatherization standards on completion. The state will assure through monthly review of production that reweatherizations do not exceed ten percent of the state's completed dwelling units. Reweatherizations have averaged less than one percent over the past three years.

In the event of a natural disaster which results in damage to low-income homes, Subrecipient and state staff will evaluate the damage to determine the appropriate role for the Weatherization Assistance Program in relief efforts. See section V.9.

During scheduled on-site monitoring visits, K-WAP staff reviews a sample of client files to assure they were eligible for weatherization. In addition, K-WAP staff reviews annual Subrecipient CPA reports for findings related to ineligible units. In each case, the K-WAP recoups weatherization funding for ineligible units.

Eligible Structures:

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

Structures are ineligible for weatherization grant funds if they are condemned, scheduled for demolition, or designated for acquisition or clearance by a Federal, State, or local program within twelve months from the date of weatherization scheduled completion.

Structures will be assessed for compliance with the State Historic Preservation Officer (SHPO) Programmatic Agreement. Weatherization services or select measures may not be eligible on certain homes as identified by a Section 106 review.

Structures will be assessed to ensure that weatherization measures will be effective. The expected lifetime of measures and their benefit will be taken into consideration when assessing structure eligibility. Conditions which constitute such limitations may include, but are not limited to:

- If remodeling or rehabilitation of the property (either planned or in progress) is substantial enough to degrade the effectiveness of weatherization.

- If the conditions of structural or mechanical systems of the home are such that it is not safe and possible to install or complete core measures; i.e., furnace safety and efficiency inspections and repair, blower door guided envelope air sealing, insulation.
- If it is not possible to improve the condition of the structure sufficiently to allow the installation of the core measures with the maximum \$500 for incidental repair, or with coordinated rehabilitation funding.
- If, at a minimum, health and safety items cannot be addressed.

If conditions exist which preclude the weatherization of the structure, a brief written description of the conditions should be supplied to the client. This notification should be coupled with the notification that weatherization assistance is postponed or deferred until such time that the problem conditions have been resolved. The agency should inform the client of a “reasonable” amount of time for the resolution of the problem conditions. See Deferral Standards.

Subrecipients will exercise caution in dealing with non-traditional type dwelling units to ensure that they meet program regulations on whether the unit is, in fact, eligible. The weatherization of non-stationary campers and trailers that do not have a mailing address associated with the eligible applicant is not allowed. The use of a post office box for non-stationary campers or trailers does not meet this requirement.

Rental Units:

In PY 2016, K-WAP will require landlords to contribute the total cost of the heating and cooling units minus \$250 of K-WAP DOE dollars to repair or replace the unit.

In compliance with 10 CFR 440.22, the following procedures shall be used in the weatherization of rental dwellings:

1. Subrecipients shall use the financial assistance guidelines for dwelling units to determine eligibility.
2. Subrecipients shall obtain a signed agreement (Landlord Rental Agreement) from the owner/landlord of the building or his designated agent authorizing the work to be done and, if applicable, agreeing to the landlord’s financial participation in weatherization costs. Subrecipients should develop a detailed description of the weatherization measures authorized and costs assigned to the landlord and the agency. Rents shall not be raised solely due to the weatherization assistance provided under this part. The agreement shall include a provision that the landlord agrees not to raise the rent for at least one year from the time the work is completed, unless raising the rent is based on factors unrelated to the weatherization improvements. The client shall be provided a copy of the signed agreement. The K-WAP will not use a lien on landlord property.
3. In order to weatherize an entire multi-family building, the building must have at least 66 percent program eligibility rate (50 percent duplex or four-plex) including those units that will become eligible within 180 days under a federal, state or local government program for rehabilitating the building or making similar improvements to the building. On a case-by-case basis, with prior

approval from DOE, certain eligible types of large multi-family buildings may be eligible for weatherization if as few as 50 percent of the units were certified as eligible for weatherization. This exception applies only to those large multi-family buildings where an investment of DOE funds would result in significant energy-efficiency improvement because of the upgrades to equipment, energy systems, common space, or the building shell.

4. The maximum amount of grant funds which can be spent for weatherization is determined by the number of units within that building occupied by eligible families/tenants, multiplied by the average cost per home. That amount may be spent on measures for the entire building. For reporting purposes, all units receiving weatherization may be reported as “completed units.”
5. Approved measures (10 CFR 440, Revised Appendix A) that are applicable to multi-family units should be assessed, prioritized and implemented in an energy savings/cost effective manner appropriate to the particular building.
6. A building which is totally vacant may be weatherized only in conjunction with a federally funded rehabilitation project, and with the assurance that at least 66 percent of the units will be leased to income eligible tenants. If the building is partially occupied, vacant units may be weatherized if 66 percent of the total units are occupied by eligible tenants, but the maximum funding which can be used for the building is determined by the number of eligible units, as in the example used in #3.
7. No undue or excessive enhancements shall accrue to the value of weatherized dwelling units in Kansas. Weatherization measures to be completed on rental units, as on owner units, must be cost-effective, as determined by approved unit profiles or by an individualized REM/Design audit. The state may recoup costs of excessive weatherization measures.
8. The benefits of weatherization services shall accrue primarily to the low-income tenants residing in the unit.
9. Subrecipients shall include in their rental agreements the address and telephone number of the Legal Aid Society office(s) serving their areas, as well as a statement that Legal Aid is responsible for arbitrating landlord-tenant disagreements arising from weatherization activities completed on the units.
10. Shelters are eligible for weatherization activities, as follows:
 - a. “Shelter” is defined as a dwelling unit or units whose principal purpose is to house on a temporary basis individuals who may or may not be related to one another and who are not living in nursing homes, prisons or similar institutional care facilities.
 - b. For the purpose of determining how many dwelling units exist in a shelter, the minimum size for each dwelling unit within the shelter shall be 800 square feet of living space, or each floor of the shelter may be counted as a dwelling unit.

Deferral Standards:

Deferral may be necessary if health and safety issues cannot be adequately addressed through this guidance. The decision to defer work in a dwelling is difficult but necessary in some cases. This does not mean that assistance will never be available, but that work must be postponed until the problems can be resolved and/or alternative sources of help are found. In the judgment of the Subrecipients, which include crews and contractors, any conditions that exist, which may endanger the health and/or safety of the workers or occupants, should be deferred until the conditions are corrected. Deferral may also be necessary where occupants are uncooperative, abusive, or threatening.

Subrecipients will develop guidelines and a standardized form for such situations.* The form will include the client's name and address, dates of the audit/assessment and when the client was informed, a clear description of the problem, conditions under which weatherization could continue, the responsibility of all parties involved, and the client(s) signature(s) indicating that they understand and have been informed of their rights and options and have the opportunity to appeal.

Deferral conditions may include:

1. The client has known health conditions that prohibit the installation of insulation and other weatherization materials.
2. The building structure or its mechanical systems, including electrical and plumbing, are in such a state of disrepair that failure is imminent and the conditions cannot be resolved cost-effectively.
3. The house has sewage or other sanitary problems that would further endanger the client and weatherization installers if weatherization work were performed.
4. The house has been condemned or electrical, heating, plumbing, or other equipment has been "red tagged" by local or state building officials or utilities and cannot be remedied by weatherization funds.
5. Moisture problems have developed signs of mold.
6. Dangerous conditions exist due to high carbon monoxide levels in combustion appliances, and cannot be resolved under existing health and safety measures.
7. The client is uncooperative, abusive, or threatening to the crew, subcontractors, auditors, inspectors, or others who must work on or visit the house.
8. The extent and condition of lead-based paint in the house would potentially create further health and safety hazards.
9. If, in the judgment of the energy auditor, any condition exists which may endanger the health and/or safety of the work crew or subcontractor, the work should not proceed until the condition is corrected.
10. The utilities to the property have been disconnected by the utility company.

11. The combined price of required H&S measures exceeds the average H&S expenditure to the extent that the agency cannot balance the expenditure to maintain the required H&S percentage. In this instance, the agency may defer the home until additional funds are located to lower the expenditure to within the average.

12. The property is currently listed for sale and/or the eligible occupant will be moving.

*Disclaimer notices are currently in place for lead paint and mold found in homes when needed.

V.1.2 Definition of Children

The State of Kansas has defined “children,” in terms of prioritizing households including children, as those 18 years old and under. Data are compiled in age groups of 0-2, 3-5, 5 and under, and 6-18 years of age.

V.1.4 Approach to Tribal Organizations

In accordance with federal rule, the State of Kansas recommends that tribal organizations not be treated as local applicants eligible to submit an application to operate a Weatherization Assistance Program. Native Americans will receive assistance as eligible individual applicants under program guidelines.

V.2 SELECTION OF AREAS TO BE SERVED

Each Subrecipient listed in this application is a public or private nonprofit agency, including Community Action Agencies (CAAs), units of local government, a housing service agency, and an economic development district.

Each existing Subrecipient was selected initially by criteria set forth in 10 CFR 440.15. (See map of areas attached.) Every year an analysis is completed on each Subrecipient’s performance, including the review of monitoring visits and resolution of findings, production reports, expenditures in relationship to units completed, the quality of weatherization services provided, annual CPA audit reports, and general staff observations from interactions with Subrecipient staff and clients. On the basis of each Subrecipient’s performance, a written closeout report is issued each year, requiring responses to noncompliance issues.

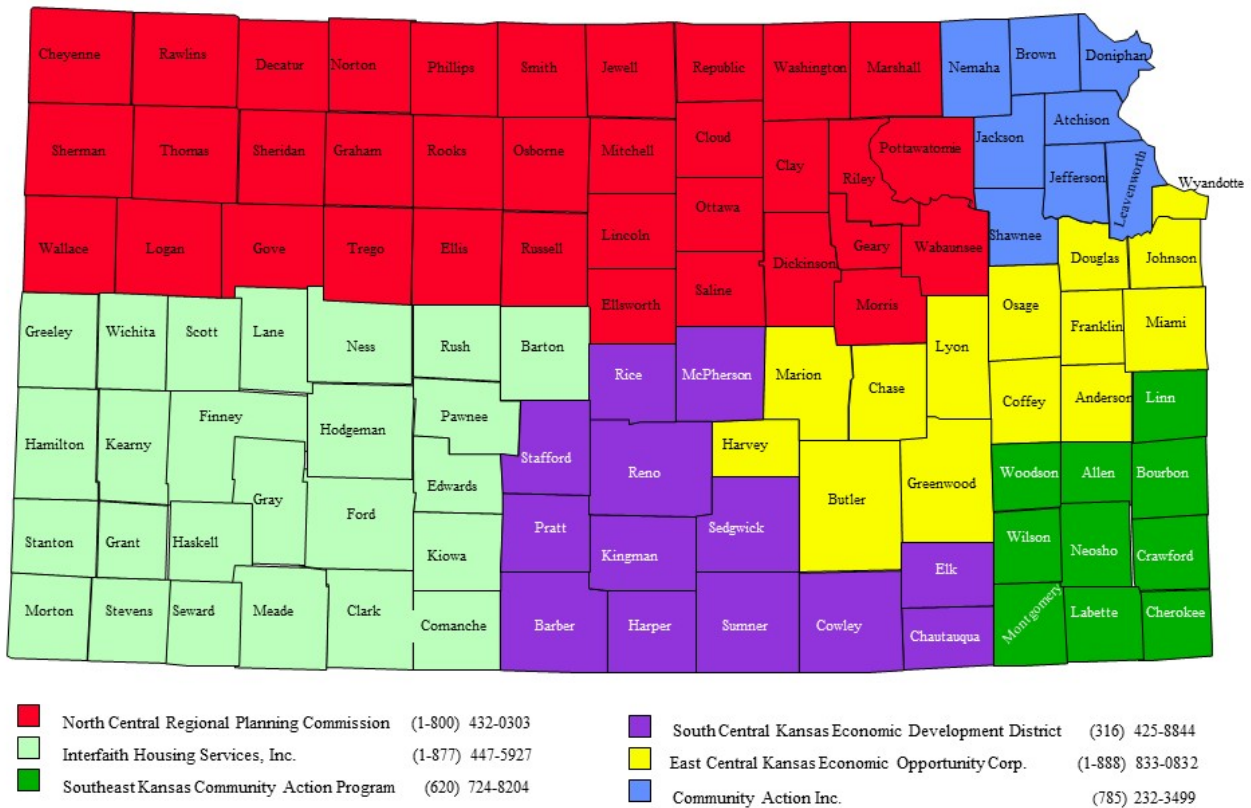
The WAP Subrecipient Procedure Manual describes procedures for the state’s response to Subrecipient noncompliance, including recoupment or reduction of funding, subgrant probation, and subgrant termination.

The entire geographical area of the Grantee shall be served by the Weatherization Assistance Program. This requirement will be accomplished with a combination of DOE and other funds, as available, and may require multiple program years.

Allocation of funds to Subrecipients and across budget categories will be based on the base formula as available from KHRC. The base formula is based on the 2010-2014 American Community Survey 5-year Estimates.

Redistribution Provision: If Subrecipients are unable to expend their funds in a timely manner, KHRC/K-WAP retains the right to allow for re-allocation of funds to Subrecipients and across budget categories using the same formula as originally proposed or any other funding plan that meets the needs of targeted Kansas citizens without holding additional public hearings. Active management and re-allocation of the grant allows the grant to be fully expended during the budget period.

Counties Served by Kansas Weatherization Assistance Program



V.3 PRIORITIES

K-WAP and Kansas weatherization Subrecipients give priority to three groups of households: those with low-income elderly clients, those with low-income clients who have disabilities, and those with low-income families with children 18 years of age or under. The weatherization Subrecipients seek actively and aggressively to identify the households, which include these priority groups. Their outreach methods include media advertising, networking with Area Agencies on Aging, the Kansas Department of Children and Families, homeless shelters, public housing authorities, other providers, and word of mouth. Subrecipients market their services in key locations where low-income residents are provided services.

Subrecipients have developed procedures for serving clients by priority. These priorities (including the above federally-mandated priorities) may include:

1. Elderly persons (age 60 or over)
2. Persons with disabilities (any individual who has a physical or mental disability which constitutes or results in a substantial handicap to the individual's employment; or a person who has a record of having, or is regarded as having, a physical or mental impairment which substantially limits one or more of the individual's major life activities; or someone who has a disability which would make the individual eligible to receive disability insurance benefits or supplemental security income from the Social Security Administration or developmentally disabled assistance from the Department of Health and Human Services)
3. Families with children 18 years old or under
4. Those geographic regions that did not receive weatherization benefits in the previous program year.

Emergencies may take precedence over all other priorities. Emergencies are defined as life-threatening housing conditions, and they shall be documented as such in client files.

Weatherization Subrecipients are sensitive to the issues of high-energy burden and high residential fuel usage. The State of Kansas is working with other agencies to establish these categories for use in identifying priorities. Until a uniform standard is developed, high energy burden will not be a priority for eligibility.

Kansas estimates services to targeted groups (i.e., elderly, persons with disabilities, children) based on their percentage in the general population, according to the 2010-2014 American Community Survey 5-year Estimates. The state also estimates its services to owners and renters on the same basis.

V.4 CLIMATIC CONDITIONS

The National Oceanic and Atmospheric Administration's account of climatic conditions from the National Climatic Data Center reported that Kansas' 30-year average (1981-2010) heating degree days was 5,159 and its average cooling degree days was 1,359. The data file is attached for four representative weather stations. Based on the cooling degree-days, the state has approved specific cooling measures which are determined cost-effective by the REM/Design audit. The REM/Design audit utilizes the four provided climatic zones across Kansas to factor in climatic variances within the state.

V.5 TYPE OF WEATHERIZATION WORK TO BE DONE

V.5.1 Technical Guides and Materials

Prioritization of weatherization measures to be performed on a dwelling unit have been established according to 10 CFR 440.21, Standards and Techniques for Weatherization. Energy audits will be conducted on each dwelling unit covered by the state's weatherization program.

Weatherization measures approved in Kansas, as justified by an individualized REM/Design audit, include:

1. Diagnostic combustion appliance testing.
2. Measures to reduce infiltration.
3. General heat waste measures: water heater tank wrap, water heater pipe insulation on the first six feet, water pipe insulation in unconditioned areas, low-flow faucet aerators, low flow showerheads, replacement of furnace or air conditioner filters, and duct sealing and insulation when located outside the thermal boundary.
4. Installation of a smart thermostat.
5. Necessary repairs or replacement of primary heating unit.
6. Installation of attic insulation up to R-38.
7. Installation of dense-pack wall insulation.
8. Installation of floor insulation up to R-30.
9. Installation of interior or exterior storm windows over single-glazed, loose fitting primary windows.
10. Installation of wire or fabric sunscreen.
11. General cooling measures; including, air conditioning replacement.
12. Installation of other measures necessary to protect installed weatherization materials.
13. Necessary health and safety repairs.
14. Installation of compact florescent light bulbs (CFL's) or LED light bulbs
15. Refrigerator replacement.
16. Installation of primary windows and exterior grade doors.

All weatherization materials must meet the latest standards for weatherization as published in 10 CFR 440.21, revised Appendix A, or subsequent ASTM, ANSI, or FS-approved standards which supersede an individual standard. Subrecipients shall give preference in their purchases to products containing the highest level of recovered or recycled materials practicable.

In accordance with WPN 15-4, all measures installed in PY 2016 and beyond will met the objectives and desired outcomes of the Standard Work Specification as adopted and outlined in the Kansas SWS Field Guide.

This document currently contains the language for all the desired outcomes, specifications, and objectives required to complete weatherization work on single family homes. A digital, dated version of the field guide has been provided to all Subrecipients and will be available for all contractors and the public on the KHRC Weatherization Website: <http://www.kshousingcorp.org/more-program-information.aspx>. The primary language of the SWS Field Guide will be reviewed and updated annually as necessary.

Supporting photographs and how-to practices for specifications will be updated on an ongoing process and provided as new dated versions of the guide on the website. Mobile Home and Multifamily specifications will be added to the Kansas SWS Field Guide as developed and approved by the Technical Committee.

Proposed changes and clarifications should be submitted to the K-WAP Technical Committee. All SWS primary language updates will be reviewed and incorporated on an annual basis. Annual and critical updates will be communicated with an effective date to all Subrecipients for distribution to crews and contractors.

All Grantee and Subrecipient agreements and vendor contracts, active in Program Year 2016 will contain language which clearly communicates the expectation for quality work and the requirement to be in compliance with the Kansas SWS Field Guide. A signed contract that includes confirmation of receipt and understanding shall be sufficient and binding.

V.5.2 Energy Audit Procedures

K-WAP has received DOE’s (5) year audit approval and it is valid through February 26, 2021.

In no case may a weatherization measure be installed that shows an SIR of less than 1.0. Subrecipients must also demonstrate good judgment in determining the appropriateness of some measures that show an SIR of 1.0 or above, assuring they manage to the average cost per unit, and balancing between providing more services to fewer households and providing appropriate services to more households.

Multi-family units comprise a small percentage (less than 20%) of eligible units within Kansas, with the majority of these units being small complexes. Small multi-family buildings are defined as buildings with 25 dwellings or fewer per building and units must be individually heated and/or cooled. These individually heated units will be modeled in REM/Design as individual units using the same field auditing and modeling procedures as detached single family units. Large multifamily buildings (26+ units) or those buildings with a shared heating/cool systems may be weatherized on a case-by-case approval by DOE. The audit and assessment procedures must be appropriate to the dwelling type and each audit and all supporting documentation will be submitted to the DOE Project Officer for pre-approval.

<u>Unit Types</u>	<u>Audit Procedures and Dates Most Recently Approved by DOE</u>
Single-Family	REM/Design audit (February 26, 2016)
Manufactured Housing	REM/Design audit (February 26, 2016)
Small Multi-Family	REM/Design audit (February 26, 2016)
High Rise/Large Multi-Family	TREAT (on a case by case DOE approval basis)

V.5.3 Final Inspection

No dwelling unit may be reported to the Department of Energy as completed until the Subrecipient, or its authorized representative, has conducted a final inspection and certified that applicable work has been completed in a professional manner and in accordance with the priority determined by the audit procedures. Final inspections shall include post-weatherization blower door tests, mechanical inspections, and worst case draft tests.

Every DOE WAP unit reported as a completed unit must receive a final inspection ensuring that all work meets the minimum specifications as outlined in the Kansas SWS Field Guide. The individual who performs this final inspection shall be a certified Home Energy Quality Control Inspector (QCI). Every client file must have a form that certifies that the unit had a final inspection and that all work met the required standards. The form must be signed by a certified QCI. The inspection must include an assessment of the original audit and confirm that the measures called for on the work order were appropriate and in accordance with K-WAP procedures.

To meet the Quality Work Plan inspection requirement, every agency shall have on staff a certified QCI. Additional WAP inspection staff should work towards QCI certification and must, at a minimum, take the QCI field training (see Training). Where or when an agency does not have a certified QCI on staff to meet the requirement or inspection demands, a contracted certified QCI may be used. This contracted QCI may be an independent contractor or an arrangement with a network certified QCI may be established. All certified QCI inspectors working within K-WAP must maintain a valid copy of their certification with KHRC.

Due to the size of many Subrecipient agencies, the desire to have a completely independent QCI may not be realistic. It will be acceptable to have the same individual conduct the audit and perform the final inspection. However, the final inspector shall not be involved in any of the actual work on the home. Because this model does not allow for an independent review of the audit on every home, the percentage of monitoring shall be at least 10 percent.

A part of monitoring will be to ensure that final inspectors are QCI certified and are inspecting to the Kansas SWS Field Guide. Inspectors found not upholding the high quality of work expectations and standards will be written up. Corrective action plans will be required to be developed and implemented and will be tracked to resolution.

V.6 WEATHERIZATION ANALYSIS OF EFFECTIVENESS

Subrecipient effectiveness is assessed through multiple measures. Onsite monitoring requirements, as described in V.8.3 Monitoring Activities, provide ideal conditions during which Subrecipients may be evaluated and areas in need of improvement can be identified. In addition to the formal monitoring reporting that tracks deficiencies and findings and outlines how to make improvements, monitoring visits allow for a comprehensive review of the agency. Such review may include technical and financial systems and procedures, follow up on previous training outcomes and identification of future training needs, and the sharing of “Best Practices” at all levels of operation.

Monthly desk top budgetary reviews enable the grantee to analyze Subrecipient performance and productivity on an ongoing basis.

The K-WAP fuel savings effectiveness is calculated using data provided from the REM/Design audit software. The analysis provides K-WAP with information on each weatherized unit which allows staff to identify significantly high and/or significantly low performers. K-WAP staff analyzes the data for T&TA purposes that allows them to compare effectiveness within a Subrecipient’s area and between Subrecipients. The need for additional T&TA may be identified through these comparisons.

T&TA funds are made available and utilized throughout the K-WAP network to allow for continuous improvement. For current certified inspection staff, the use of continuing education credits is used to maintain certification and to ensure on-going acquisition of knowledge and information about new procedures, materials, and trends. 30 hours of continuing education credits are required every two years to maintain certification.

Each Subrecipient is provided an annual award closeout report that is an analysis of their performance and effectiveness. The report may include the review of monitoring visits and resolution of findings, production reports, expenditures in relationship to units completed, the quality of weatherization services provided, annual CPA audit reports, general staff observations from interactions with

Subrecipient staff and clients, the number of counties served, and agency average cost expenditures as compared to entire state averages. This annual review allows Grantee staff to review and compare Subrecipients' productivity and effectiveness.

Success Stories - Each agency will be expected to collect a total of two "success stories" that occurred throughout the Program Year. The story must be accompanied with pictures of the dwelling and if at all possible the unit's resident. KHRC can be contacted for the appropriate consent forms for potential written publication and use of the picture(s).

V.7 HEALTH AND SAFETY

The K-WAP stresses the importance of improved client health and safety as one of the primary outcomes of weatherization. Weatherization training includes observing possible sources of moisture, testing air leakage, questioning clients about their comfort level and lifestyle, and testing combustion appliances for safety. Pre-inspection guidelines and work standards addressed in the WAP Subrecipient Procedure Manual detail the problems to review, the hazards from various sources, and their interactions with other factors. Inspectors are taught to use the automated audit and inspection as teaching tools for clients.

Incidental Repairs: Incidental repairs are those materials and installation costs which are performed to protect or aid in the installation of an energy conservation measure and are part of the total allowable expenditure. Justification for the cost of each incidental repair and how it is necessary for the effective performance or preservation of a weatherization measure must be documented in the client file. The BWR for each home that receives incidental repair measures should include a brief description of the measures performed as incidental repairs.

Incidental repair costs do not receive individual audit approval but are included in the total package cost of weatherization measures when calculating the SIR for the whole building. For each weatherized unit, the total package cost including incidental repairs must have an SIR of 1.0 or greater. KWAP will retain a maximum cap of \$500 per dwelling unit for incidental repairs. This \$500 limit is not an average, but the maximum which can be expended on each home for this category.

The Subrecipients may exceed the \$500 limit, if certain requirements are met, by submitting a written waiver request to the KHRC/WAP staff for written approval. The written request must include the total amount to be expended and must include the REM/Design audit to insure the home maintains an overall SIR of 1. The written request for a waiver can be submitted by e-mail as long as all pertinent information is submitted to KHRC/WAP staff for approval.

Health and Safety Allowance:

WPN 11-6 requires Grantees justify the Health and Safety limits requested in this plan.

The following table provides the recent historical averages for health and safety cost per home expense data broken down by topic for all Kansas Subrecipients.

Health and Safety Category	Historical Cost	Projected Cost
General Health and Safety*	\$434.78	\$ 468.27
Furnace Replacement for H&S	\$350.37	\$ 350.37
Lead Safe Work Practices	\$ 56.92	\$ 56.92
Water Heater Replacement for H&S	\$ 12.44	\$ 24.44
Totals	\$854.51	\$ 900.00

*Gas leak repair, combustion vent repair, correct indoor air quality, removal of hazardous material, installation of smoke and CO alarms, correct duct system pressure imbalances.

The projected rise in General Health and Safety is based on incurred costs associated with the increase in frequency of flue liner installation and flue repair. H&S Water Heater Replacements, and the cost of those replacements, are predicted to increase in 2016 based on new efficiency standards and worst case drafting test procedures.

Health and Safety expenditures shall not exceed an average of 15% of the average cost per unit. The average expenditure shall not exceed \$1065.75 per unit if fully utilizing the maximum average cost per unit allowed during the 2016 PY. This limit should be sufficient to remedy most health and safety concerns associated with the installation of weatherization measures in Kansas as required by DOE. Kansas does have a significant number of clients with older housing stock that may have dirt floor basements and/or crawl spaces, asbestos, including vermiculite, lead based paint, knob and tube wiring, and/or a numerous other H&S related concerns. Expenses charged as health and safety measures do not require cost justification and are not to be included as part of the per unit average. The H&S average quarterly expenditure shall not exceed 15% of the program operations to ensure budget control. State review and approval will be required for any Subrecipient exceeding this set amount.

Grantee Health and Safety

There are some instances where, depending on circumstances, the measure can be considered either a health and safety measure OR an energy conservation measure (e.g., furnaces). In those instances where the measure has a cost-effective savings-to-investment ratio (SIR) of one (1) or greater, the measure should be treated as a weatherization efficiency measure.

Health and Safety funds are to remedy health and safety hazards which are necessary before, or because of, the installation of weatherization materials. These funds will be expended by Subrecipients in direct weatherization activities. Costs related to grantee health and safety will be charged to health and safety cost category, as applicable.

Crew and/or Contractor Health and Safety

Local agencies and contractors must comply with Occupational Safety and Health Administration (OSHA) requirements in weatherization activities. Costs for local agencies to comply with OSHA requirements may be charged as *health and safety* or *tools and equipment*. Kansas will use the tools and equipment cost category consistently throughout the state.

Because of the wide range of activities involved in weatherizing a house, ensuring crew health and safety requires a broad knowledge of the appropriate safety requirements. Some of these requirements

include, but are not limited to: respirator protection, techniques for safely lifting heavy objects, electrical equipment safety, ladder safety, and general worker protection. OSHA standards can be consulted for further details. Other useful information includes Material Safety Data Sheets that identify potential health risks and describe the proper use, handling, and storage of a wide variety of materials, including some common weatherization materials. They also suggest personal protective equipment and address first aid measures. Local agencies and contractors electing to obtain OSHA-10 and OSHA-30 certifications may utilize T&TA funding.

Kansas weatherization also recognizes the connection between weatherization work and the health of the occupants. Partnerships have been and will continue to be developed between KWAP and the Healthy Homes Program and the Kansas Department of Health and Environment. Inspectors have already attended the course Health Opportunities in Energy Audits and Upgrades offered by KDHE Kansas Healthy Homes and Lead Hazard Prevention Program. This course will ensure that there is consistent education and applied prevention techniques used in each unit to minimize any negative health outcomes that could result as an impact of the weatherization activities on the families we serve.

Client Health and Safety

The State of Kansas and Subrecipients are required to take all reasonable precautions against performing work on homes that will subject workers or clients to health and safety risks. Before beginning work on the residence, the agency must take into consideration the health concerns of each occupant, the condition of the dwelling, and the possible effect of work to be performed on any particular health or medical condition of the occupants. When a person's health is fragile and/or the work activities would constitute a health or safety hazard, the occupants at risk will be required to leave the home during these work activities.

Client education has been provided over the years by different methods in each area of the state, ranging from detailed discussions with clients during pre- and post-inspections to access to program-related publications. This includes, but is not limited to: lead-based paint, asbestos, combustion safety and venting, carbon monoxide, mold and moisture, ventilation, structure hazards, and other hazards. As the program has become more technology-oriented, state staff encourages Subrecipient staff to use the technology to demonstrate energy-saving techniques and to explain the outcome of poor energy habits, bad energy decisions, and potential household hazards.

Potential Hazard Considerations

1. **Biologicals** – Removal of mold, odors, viruses, bacteria, unsanitary conditions (including raw sewage), and rotting wood is not a Weatherization responsibility; however, program workers frequently encounter these conditions. DOE funds may not be used to correct the condition and the home may need to be deferred (Subrecipient Procedures Manual, Section 2155: Postponement of Weatherization). Caution should be taken when selecting air tightness limits for dwellings with these problems. Since some of these conditions are related to moisture, the Subrecipient has established procedures that allow local agencies to assess moisture conditions as a part of the initial audit procedure and treat them as part of the weatherization work. If necessary, weatherization services may need to be delayed until the problem can be referred to another agency that can take remedial action.

- **Mold and Moisture** - Correction of moisture and mold creating conditions allowed. Mold cleanup or testing is not an allowable health and safety cost. Surface preparation where weatherization measures are being installed must be charged as part of the energy conservation measure and cannot be charged to the health and safety budget category. Where severe Mold and Moisture issues cannot be addressed, deferral is required.
 - **Drainage - gutters, down spouts, extensions, flashing, sump pumps, landscape, etc.** Major drainage issues are beyond the scope of the Weatherization Assistance Program. Drainage repairs are allowable health and safety costs only as they relate to mold and moisture.
2. ***Combustion Appliances and Combustion Gases*** – Devices needed to test for dangerous concentrations of combustion products in the living space may be purchased under the health and safety cost category. Subrecipients have developed a policy on this hazard. The policy includes a procedure for testing combustion appliances in all homes, but particularly before and after air tightening. This procedure will consist of checking carbon monoxide levels in the flue/vent of vented appliances and near the exhaust of unvented applicants; examining draftability of flues, start-up spillage at flues, and adequacy of combustion air; and testing for fuel leaks. Combustion appliances to be tested include furnaces, boilers, and water heaters. Subrecipient health and safety procedures explain in detail how the Subrecipient will handle problems discovered in its testing program. These details will include the methods used to determine when DOE monies will be used to remedy incidental problems and how the Subrecipient will treat problems that cannot be remedied with DOE monies after discovery.
- a. Gas furnaces - Red tagged”, inoperable or nonexistent heating system replacement, repair, or installation is allowed where climate conditions warrant, unless prevented by other guidance herein.
 - b. Air conditioning system - Replacement, repair, or installation is not an allowed health and safety cost. Replacement must be charged as an energy conservation measure.
 - c. Water heaters - Water heating systems can be replaced using weatherization funds if one of the following circumstances exist; heat exchanger cracked, producing a high concentration of CO, or leaking.
 - d. Gas Dryers - Proper venting to the outside for combustion appliances, including gas dryers is required. Correction of venting is allowed when testing indicates a problem.
 - e. Gas Cook Stoves – Replacement, repair, or installation is not an allowable health and safety or energy conservation measure.
 - f. Unvented heaters – Removal is required, except as secondary heat where the unit conforms to ANSI Z21.11.2. Unvented heaters must be removed prior to weatherization but may remain until a safe heating system is in place.
 - g. Smoke, Carbon Monoxide alarms, and Fire Extinguishers – installation of smoke/CO alarms is allowed where alarms are not present or inoperable. Replacement of operable smoke/CO alarms is not an allowable cost. Providing fire extinguishers is allowed only when solid fuels are present.
3. ***Other Heating Sources*** -
- a. Solid Fuel Heating (Wood Stoves, etc.) – Maintenance, repair, and replacement of primary indoor heating units is allowed where occupant health and safety is a concern. Maintenance and repair of secondary heating units is allowed.

- b. Space Heaters, Stand alone Electric – Repair, replacement, or installation, is not allowed. Removal is recommended.
 - c. Space Heaters, Unvented Combustion – Removal is required, except as secondary heat where the unit conforms to ANSI Z21.11.2. Units that do not meet ANSI Z21.11.2 must be removed prior to weatherization but may remain until a replacement heating system is in place.
 - d. Space Heaters, Vented Combustion – Should be treated as a furnace.
4. **Fire Hazards** – Combustion appliances and their associated venting systems can also present potential fire hazards. State health and safety procedures will identify inadequate clearances between combustion appliances (including venting systems) and combustible materials. Correction of fire hazards is allowed when necessary to safely perform weatherization.
5. **Existing Occupant Health Problems** – Agencies should be aware that some individuals’ health problems could be exacerbated by weatherization activities. For example, some clients can be sensitive to dust generated from the installation of cellulose insulation. There is also some concern that the use of blower doors could aggravate certain health problems, although the limited research conducted on this topic has not validated these concerns. Subrecipients will establish procedures to identify preexisting conditions (e.g., allergies) and address such problems when they are found. Those procedures will address the manner in which such problems will be identified and the steps to be taken to ensure that weatherization work will not worsen these problems.

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. Temporary relocation of at-risk occupants may be allowed on a case by case basis. Failure or the inability to take appropriate actions must result in deferral.

6. **Indoor Air Quality**

- a. **Asbestos** – General asbestos removal is not approved as a health and safety weatherization cost. Major asbestos problems will be referred to the appropriate state agency and/or the Environmental Protection Agency (EPA). Where local agencies work on large heating and distribution systems, including related piping, asbestos removal may be necessary. Removal is allowed to the extent that energy savings resulting from the measure will provide a cost-effective savings-to-investment ratio. This would normally be true with work done on large, multifamily heating systems. Where permitted by code or EPA regulations, less costly measures that fall short of asbestos removal, such as encapsulation, may be used. Removal and replacement of asbestos siding for purposes of wall cavity insulation is permissible if allowed by state and local codes. “Asbestos” is covered in the State of Kansas Weatherization Procedures Manual.
- **In siding, walls, ceilings, etc** - Removal of siding is allowed to perform energy conservation measures. All precautions must be taken not to damage siding. Asbestos siding should never be cut or drilled. Where possible, insulate through home interior.

- **In vermiculite** - When vermiculite is present, take precautionary measures as if it contains asbestos during inspection. The home will be deferred until the removal of vermiculite by a certified asbestos professional is completed. DOE funds cannot be used for removal or testing.
 - **On pipes, furnaces, other small covered surfaces** – Suspected asbestos containing material present on pipes, furnaces, or other small covered surfaces, shall be assumed to contain asbestos, unless testing determines otherwise. The material’s overall condition and the potential for disturbing the material will be evaluated. Where the material condition is good and intact at time of inspection and there is no risk of disturbing the material, weatherization work should proceed. Clients and workers will be instructed not to disturb the material. Where the material is in less than good condition, the material is non-intact, or the material may be disturbed, the home will be deferred until the material is deemed non-asbestos containing or removed or encapsulated by a certified asbestos professional. DOE funds cannot be used for removal, encapsulation or testing.
- b. ***Spray Polyurethane Foam (SPF)*** Use EPA recommendations (available online at http://www.epa.gov/dfe/pubs/projects/spf/spray_polyurethane_foam.html) when working within the conditioned space or when SPF fumes become evident within the conditioned space. When working outside the building envelope, isolate the area where foam will be applied, take precautions so that fumes will not transfer to inside conditioned space, and exhaust fumes outside the home.
 - c. ***Radon*** – Radon testing and abatement is not an allowable activity under the weatherization program. However, those costs associated with taking precautions in a dwelling known to have radon problems are allowable weatherization expenditures. Whenever site conditions permit, exposed dirt must be covered with a vapor barrier, except for mobile homes.
 - d. ***Formaldehyde and Volatile Organic Compounds (VOCs)*** – Formaldehyde vapors may be slowly released by some new carpets, waferboard, plywood, etc. VOCs are also emitted by some household cleaning agents. Air sealing tightness and ventilation rates will be taken into consideration in dwellings with VOC problems.

Removal of pollutants is allowed and is required if they pose a risk to workers. If pollutants pose a risk to workers and removal cannot be performed or is not allowed by the client, the unit must be deferred.

7. *Lead Paint – Lead Safe Work:*

- a. All weatherization inspectors, agency crew members, general weatherization contractors and crew members must receive and comply with the Department of Energy’s Lead Safe Weatherization (LSW) training. Training resources will be provided by KHRC upon request. LSW is required on all pre-1978 homes if any painted surfaces are to be disturbed.
- b. All weatherization inspectors, agency crew members, general weatherization contractors and crew members must attend and successfully complete the Kansas

Department of Health and Environment (KDHE) approved, Lead Safe Work Practice Training course and fulfill KDHE requirements to become Certified Renovators.

- c. All general contractors and crew will be responsible for complying with the Lead Based Paint Renovation, Repair, and Painting Rule (RRP) and Lead Safe Work Practices (LSWP) regulations as enforced by KDHE in Kansas.
 - d. Agencies with crews and weatherization contractors must be a KDHE Licensed Renovation Firm.
 - e. RRP and Kansas weatherization requires all licensed firms to employ a Certified Renovator who is registered with the KDHE. Weatherization jobs will have a designated Certified Renovator on each job site at all times during weatherization activities. The Certified Renovator will document that LSW and RRP requirements were followed. A copy of this documentation will be required in the client file.
 - f. Only those costs directly associated with the lead safe practices should be charged to the health and safety budget category.
8. ***Building Structure*** – Building rehabilitation is beyond the scope of the Weatherization Assistance Program; however, program workers frequently encounter homes in poor structural condition. Dwellings whose structural integrity is in question should be referred to housing rehabilitation programs, where appropriate. Weatherization services may need to be delayed until the dwelling can be made safe for crews and occupants. Incidental repairs necessary for the effective performance or preservation of weatherization materials are allowed. Examples of these limited repairs include sealing minor roof leaks to preserve new attic insulation and repairing water-damaged flooring as part of replacing a water heater.
9. ***Electrical Issues*** – The two primary energy-related health and safety electrical concerns are insulating homes that contain knob-and-tube wiring and identifying overloaded electrical circuits. Older electric wiring, primarily knob-and-tube wiring, located in a wall cavity or exposed on an attic floor was intended by code to have free air movement to cool the wire when it is carrying an electric current. Laboratory tests have shown that retrofitting thermal insulation around electric wiring can cause it to overheat, resulting in a fire hazard. For this reason, the installation of insulation around live knob and tube wiring should not be performed. Sidewalls that contain live knob and tube wiring are not to be blown with insulation. In attics, a reasonable cost of rewiring live knob and tube should be included in the cost of the attic insulation for audit approval. The cost of rewiring will be charged with the cost of the energy conservation measure of attic insulation if audit approved. If the cost of rewiring is prohibitive, the cost of attic insulation shall be run independently and should be valleyed or dammed to prevent covering live knob and tube. Subrecipients are to abide by more stringent applicable codes in jurisdictions where the work is being performed.

Note: Serious electrical hazards exist when gross overloads are present. Should auditors and crews find such existing problems, they should notify the owner. Weatherization measures that involve the installation of new equipment such as air conditioners, heat pumps, or electric water heaters can exacerbate previously marginal overload problems to hazardous levels. The problem

should also be noted in the client file. To the extent that these problems prevent adequate weatherization, the agency should consider repairing them on a case-by-case basis.

Minor repairs necessary for weatherization measures and where the health or safety of the occupant is at risk are allowed. Upgrades and repairs when direct component of an energy conservation measure must be charged as part of the energy conservation measure and cannot be charged to the health and safety budget category.

10. **Refrigerant Issues** – The replacement of air conditioners, approved since 1992, and the recently approved refrigerator replacements require agencies to reclaim refrigerant per Clean Air Act 1990, section 608, as amended by 40 CFR 82, 5/14/93. The appliance vendor, manufacturing center, or other entity recovering the refrigerant must possess EPA-approved section 608, type I or universal certification. Kansas will have appropriate protocols in place that comply with all standards relating to the disposal of the existing appliances.
11. **Other Code Compliance Issues** –The correction of preexisting code compliance issues is not an allowable cost other than where weatherization measures are being conducted. 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.
12. **Pests** - Pest removal is allowed only where infestation would prevent weatherization. Infestation of pests may be cause for deferral where it cannot be reasonably removed or poses health and safety concern for workers. Screening of windows and points of access is allowed to prevent intrusion. The use of harsh chemicals is to be avoided.
13. **Ventilation** – For all DOE funded homes, ASHRAE 62.2-2013 minimum ventilation standards are required to be met to the fullest extent possible and are allowable health and safety costs. Weatherization inspectors received training on ASHRAE 62.2 evaluation, fan flow, and follow up testing to ensure compliance. Additional ventilation will be added or existing ventilation modified where required.
14. **Window and Door Replacement, Window Guards** – Replacement, Repair, or installation is not an allowable health and safety cost but may be allowed as an incidental repair or an efficiency measure if cost justified.
15. **Injury Prevention of Occupants and Weatherization Workers – Measures such as repairing stairs and replacing handrails** – 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.

V.8 PROGRAM MANAGEMENT

V.8.1 Overview and Organization

In 1992, the Kansas Weatherization Assistance Program was located in the Housing Development Division, of the Kansas Department of Commerce & Housing. In 2003, the State of Kansas Governor's Executive Reorganization Order created a stand-alone agency. The agency is now the Kansas Housing Resources Corporation (KHRC), effective July 1, 2003. A KHRC organization chart is attached.

As well as the Weatherization Assistance Program, the KHRC administers the HOME, Community Services Block Grant (CSBG), Emergency Solutions Grant (ESG), and Low Income Housing Tax Credit (LIHTC); Section 8 Housing projects, and the State Housing Trust Fund. The K-WAP has developed mutually beneficial relationships with HOME program modules, ESG, and LIHTC.

The K-WAP also obtains client information and shares data with the Low Income Energy Assistance Program (LIEAP), located in the Kansas Department of Children and Families, in an effort to target the higher energy users who utilize the utility assistance program. A distinct agency, the Kansas Corporation Commission, houses the Energy Division, funded by the State Energy Program.

V.8.2 Administrative Expenditure Limits

The State of Kansas shall not exceed the ten percent maximum administrative allocation. The K-WAP shall not exceed the five percent maximum and its Subrecipient agencies shall not exceed the remaining five percent administrative allocation. To ensure the compliance of the 10 percent maximum federal mandate, K-WAP has written policies and procedures which require that K-WAP costs are monitored and maintained against the approved agency budget. All costs are reviewed and approved by the program director prior to authorization to expend funds. Subrecipient administrative costs are controlled by the approved budget and narrative, which is a part of the signed grant agreement. All administrative costs which are determined unallowable, as a result of a resolved agency or CPA audit, shall be recouped by the K-WAP.

An exception to exceed the ten percent total administrative requirement shall apply to Subrecipients funded at less than \$350,000 of DOE funds. Subrecipient agencies are required to submit justification for administrative funds in excess of five percent of the total grant, with state approval based on the individual Subrecipient needs.

V.8.3 Monitoring Activities

In accordance with 10 CFR 440, K-WAP has the responsibility to perform monitoring and oversight of the program implementation and work performed by all its Subrecipients. This responsibility includes ensuring that grant funds are expended in accordance with applicable law, including regulations contained in 10 CFR 440; applicable OMB circulars, Financial Assistance regulations 2 CFR 200 and 2 CFR 910; Weatherization Program Notices, and other procedures that DOE may issue. The purpose of monitoring will be to assure weatherization programs are being managed within federal and state guidelines and that eligible low-income families are receiving high-quality and appropriate weatherization of their homes. Approximately 50% of the Grantee T&TA funds will be allocated for program oversight and travel by state monitors. The remaining T&TA budget will be

used for onsite training, mandatory trainings, trainers, or passed down to Subrecipients for preapproved individual T&TA activities. Additional funding sources may be utilized for special T&TA or monitoring activities as needed.

To fulfill this requirement K-WAP will conduct comprehensive monitoring of each Subrecipient at least once a year, utilizing the following approach:

A. Approach:

1. Programmatic and Management Monitoring

- a. K-WAP staff will conduct a programmatic and management review during annual one to two day on-site compliance monitoring visits utilizing the Programmatic and Management Compliance Monitoring Instrument found in the WAP Subrecipient Procedure Manual. Monitoring will be completed by the Weatherization Program Manager or Field Specialist.
- b. Training and Technical Assistance will be provided as identified as needed or as requested during this monitoring visit.

2. Subrecipient Production Monitoring

- a. Subrecipient and home inspection monitoring will be conducted during one- to four-day on-site visits by the Weatherization Field Specialist or Program Manager. All grantee field monitoring will be performed by a certified Quality Control Inspector (QCI). For larger agencies several visits may be needed. K-WAP will inspect a minimum of ten percent of completed homes, filling out a Home Inspection Monitoring Instrument (see WAP Subrecipient Procedure Manual) for all homes inspected. Monitoring forms will certify that all work met the required standards and will be signed by the QCI. A signed and dated form stating the above will be made part of the permanent client file. In progress units will be monitored as available.
- b. Units which demonstrate satisfactory completion of weatherization measures and compliance with the SWS specifications will be identified as “Pass” units; those units in which weatherization measures were completed but could have benefitted by “Best Practices” or other recommendations will be identified as “Pass with Comments” and T&TA or suggestions for the future will be made. Units on which weatherization measures either were not completed, were completed unsatisfactorily, or not in compliance with the SWS specifications will be identified as “Rework” units. If significant deficiencies are discovered, such as health and safety violations, poor quality installation of materials, or major measures missed, the Subrecipient will be required to take appropriate corrective action to resolve the outstanding issues in a timely manner. As a general rule, no additional DOE WAP funds can be charged for “Reworks” on homes that have already been reported to DOE as completed, weatherized units. “Reworks” identified on units that are reported as completed to DOE will be addressed on a case by case basis in accordance with WPN 11-3. Corrective action may require the removal of that unit from submitted reports or the use of non-DOE funds to correct the issue.

- c. Issues not resolved may result in K-WAP's recoument of funds invested in the "Rework" units.
- d. Agencies receiving a high number of "Reworks" will be monitored more frequently and will have a higher percentage of homes examined until the Grantee can be assured that all deficiencies are resolved. Once procedures are in place to prevent reoccurrences, typical monitoring will resume.
- e. Contractors found to be repeatedly failing to perform adequately may be disqualified from future work if additional worker training fails to correct issues and concerns. Subrecipients will first contact underperforming contractors by telephone to try to resolve concerns. If concerns continue, the Subrecipient will initiate a written request for corrective action. Persistent concerns or deviations from specified requirements may result in withheld payments, contract probation, or contract termination.
- c. Training and Technical Assistance will be provided as identified as needed or as requested during this monitoring visit.

3. Financial Monitoring

- a. K-WAP staff will conduct a fiscal review during annual two- to three-day on-site compliance monitoring visits by the Deputy Division Fiscal Officer, utilizing the Fiscal Monitoring Tool and the accompanying Fiscal Monitoring Guide as found in the Subrecipient Procedures Manual.
- b. Sensitive or significant noncompliance findings, such as waste, fraud, or abuse will be reported to DOE immediately.
- d. Training and Technical Assistance will be provided as identified as needed or as requested during this monitoring visit.

4. K-WAP staff will review monthly financial and production reports for each agency.

- a. If irregularities or deviations from planned activities are found, K-WAP staff will contact Subrecipient agency staff for an explanation or correction. This contact will usually be by telephone first; if not resolved by telephone, K-WAP will initiate a written request for action.
- b. If irregularities or deviations occur over several months, K-WAP may withhold payments until they are corrected. Long-term irregularities or deviations from planned activities may result in grant probation and grant termination. See Subrecipient Procedures Manual: High Risk.
- c. Sensitive or significant noncompliance findings, such as waste, fraud, or abuse will be reported to DOE immediately.

5. K-WAP staff will review the latest financial audit of agency financial activities by the close of the program year.
 - a. If the reports note program findings, K-WAP will require responses and, if appropriate, corrective action.
 - b. Depending on the severity of any problems reported, a Subrecipient may receive a follow-up monitoring review, concentrating on prior deficiencies and required corrective actions.
 - c. Issues not resolved in a timely manner may result in recoupment of disallowed costs, grant probation, and grant termination. See Subrecipient Procedures Manual: High Risk
 - d. Sensitive or significant noncompliance findings, such as waste, fraud, or abuse will be reported to DOE immediately.

B. Exemplary Agencies. Previous guidance suspended the designation of “Exemplary” Subrecipients so this status will not be utilized.

C. Visit. Monitoring visits will be scheduled at the convenience of KHRC and the Subrecipient through written correspondence. After the monitoring review is complete, the monitor will brief the Subrecipient, usually through an exit briefing, on the observations and monitoring assessments generated by the monitoring visit. Any issues that present imminent danger to people will be discussed and must be resolved immediately.

Sensitive or significant noncompliance findings, such as waste, fraud, or abuse will be reported to DOE immediately.

Within 30 days after each visit, a written report will be prepared for the Subrecipient that describes the current monitoring assessment (identifying any findings, concerns, recommendations, commendations, and best practices) and any corrective actions, if applicable. The Subrecipient has the right to respond in writing and present additional supporting documentation, clarification, and information as to why a particular finding(s) should be waived. If necessary, the Subrecipient will have 35 calendar days to respond with an acceptable corrective action plan.

Subrecipient noncompliance or repeated unresolved findings may result in disciplinary action, including recoupment of disallowed costs, grant probation, or grant terminations. See Subrecipient Procedures Manual: High Risk. Noncompliance and unresolved findings will be reported to the DOE Project Officer.

D. Tracking and Analysis. Tracking and analysis of monitoring visiting will be conducted to ensure resolution and improvement. All corrective action items will be tracked to completion and will conclude with a close out letter.

Annually, K-WAP staff will summarize each of its Subrecipients’ reviews and monitoring reports to identify each Subrecipient’s needs, strengths, and weaknesses. The results of this monitoring

analysis will be considered during annual planning and assessment of T&TA needs. An annual risk assessment of each Subrecipient will also be included the analysis.

E. Reporting. A narrative report including successes and significant problems will be reported to DOE in the *T&TA, Monitoring, and Leveraging Report*. This report will include at a minimum: the Subrecipients monitored, and major findings (waste, fraud, and abuse) and resolutions, trends with respect to findings, concerns, or other issues, needed T&TA, Subrecipients that are considered high risk and a corrective action plan, and outcome activities involving T&TA and monitoring training.

Monitoring Activities planned for the Program Year

A tentative monitoring schedule for the 2016 program year follows:

<u>Subrecipient</u>	<u>Date</u>
CAI	November 2-3
ECKAN	December 5-8
IHS	January 10-12
NCRPC	February 21-23
SCKEDD	March 13-16
SEKCAP	April 11-12

V.8.4 Training and Technical Assistance (T&TA)

T&TA activities are intended to maintain or increase the efficiency, quality, and effectiveness of the Weatherization Program at all levels. Such activities will be designed to maximize energy savings, minimize production costs, improve program management and operational efficiencies, improve crew/contractor work quality, increase client satisfaction, and to reduce the potential for waste, fraud, abuse and mismanagement.

T&TA funding will be available for Grantee and Subrecipient use. Funds may be used to pay salary, travel, and operational and contractual costs for monitoring, obtaining and maintain certifications, training, training support, and providing or receiving programmatic and technical assistance. T&TA funds may also be used to train contractors participating in the program provided a retention agreement is obtained.

The K-WAP will use the following methods to provide T&TA:

1. K-WAP staff will provide T&TA through onsite, written, and telephone communication with Subrecipient staff.
2. Staff will provide specific T&TA on automated audit inspection procedures as a regular component of the on-site home inspection monitoring visits.

3. K-WAP staff or contractor(s) will provide on-site or offsite T&TA as needed. Need may be identified by the Subrecipient staff, DOE Project Officer monitoring visits, internal state audits, IG reports, or by K-WAP staff as the result of observation for resolution of problems, or to meet updates required by DOE.
4. K-WAP and Subrecipient staff will participate in national activities as they are planned. K-WAP will assure staff are able to attend these meetings and will encourage Subrecipient staff to take advantage of training opportunities in the region by funding Subrecipient attendance with T&TA funds available to the K-WAP.
5. K-WAP management staff will attend DOE mandated activities/events, NASCSP events, State Weatherization Directors' meetings, National DOE Conference, and other staff development trainings as needed or required. Continuing education and conference attendance ensure Grantee effectiveness in administering and implementing the grant.
6. Annual training is provided on a variety of topics for the K-WAP network. Training is mandatory as announced. Annual training typically includes fiscal and technical training and may include training tracks at the Annual Kansas Housing Conference.
7. Kansas requires successful completion of its certification training for all auditors. The state provides this training through its partnership with KBSI and other regional training providers, allocating T&TA funds to each Subrecipient for the mandated training, as needed. When a Subrecipient agency is unable to hire a certified weatherization auditor, the state will allow a probationary period, during which the new hire must complete his/her auditor certification requirements. Requirements include: Weatherization Inspection Certification, Mobile Home Inspection training, Combustion Appliance training, LSW training and RRP certification, and mold training. During the probationary period, all inspections must be supervised by a certified weatherization auditor. Alternatively, an agency without a certified auditor may subcontract with a certified auditor. For the current certified staff, use of continuing education credits to maintain certification will be funded through T&TA funds. 30 hours of continuing education credits are required every two years to maintain certification.
8. Quarterly Weatherization Directors' Meetings will be scheduled to address areas of common concern with regard to training and policy for current initiatives and future program requirements. T&TA needs will be identified through feedback from the Subrecipients.
9. The K-WAP fuel savings effectiveness is calculated using data provided from the REM/Design audit software. The analysis provides K-WAP with information on each weatherized unit which allows staff to identify significantly high and/or significantly low performers. K-WAP staff analyzes the data for T&TA purposes that allows them to compare effectiveness within a Subrecipient's area and between Subrecipients. The need for additional T&TA will be identified through these comparisons.
10. Effectiveness of T&TA activities will be evaluated by formal evaluation forms completed by participants to statewide training workshops, state monitoring staff's observation and reporting of improvement in work standards and reporting, informal comments by workshop participants, agency directors, and others, and by disbursement of surveys to Subrecipients and contractors.
11. Annual grant close out reports will compare Subrecipient financial performance to state averages. Unusually high or low expenditures will receive further review and may identify additional T&TA needs.

In accordance with WPN 15-4, T&TA activities for WAP field staff are to be designed as Tier 1 or Tier 2 training. Tier 1 training is comprehensive, occupation specific training which follows the curriculum aligned with the Job Task Analysis (JTA) for that occupation. Tier 2 training is issue specific, short term trainings to address specific skills or tasks. The focus of field staff training will be on Tier 1 training.

WAP field staff are only those technical staff members directly employed by Grantee and Subrecipient agencies, such as auditors and inspectors. Contract auditors and inspectors are not explicitly included, but may be eligible for T&TA funded training as long as a retention agreement is obtained. Contracted installers are not to be considered part of WAP field staff for the purpose of targeted T&TA activities. Where T&TA funds are used for training of agency employed crews, Tier 1 training is to be the focus.

Tier 1 training will be closely aligned with credentialing requirements for the given task. Auditor and QCI training will be based on a 3 year training cycle. Individualized training plans will be allowed to be structured in the manner best suited for each agency, but the vast majority of plans will focus on receiving intensive 1-2 week trainings every 3 years. This time table is consistent and conducive to receiving intensive training in anticipation of re-certifications exams. JTA specific and Tier 2 training will be obtained on a rolling basis to fulfill certification CEU requirements.

Tier 1 training must be provided by a DOE approved accredited training program. Currently, IREC accredited training centers meet that requirement. Training will be provided by the contracted training provider in the manner best suited for the situation, but will primary be of hybrid distance learning and in person training. Santa Fe Community College has become a valued IREC accredited training provider for the QCI certification and will be K-WAP's first recommendation for Tier 1 training.

Tier 2 training will be provided on an as-needed basis. The specific need and technical expertise required will determine the training provider. State technical staff or network partners such as the Kansas Building Science Institute (KBSI) can provide specialized and short term training. Attendance in specialized training is mandatory as announced and required. Non-compliance may result in state certification suspension or contract termination.

Client education has been provided over the years by different methods in each area of the state, ranging from detailed discussions with clients during pre- and post-inspections to access to program-related publications. As the program has become more technology-oriented, state staff encourages Subrecipient staff to use the technology to demonstrate energy-saving techniques and to explain the outcome of poor energy habits and bad energy decisions. Training related to lead-based paint hazards will be on-going to meet DOE requirements. A quarterly module-training format has worked well for Kansas's T&TA activities. The state will continue to build its training plan in quarter modules, with efforts to avoid major disruptions during peak production months.

Activities planned for the 2016 Program Year follow:

First Quarter (July- September):

- Kansas Weatherization Directors' Meeting July 21, 2016
- Kansas Housing Conference August 24-26, 2016
- NASCSP Training Event September 27-30, 2016

- Quality Control Inspector Training TBA

Second Quarter (October — December):

- Kansas Weatherization Directors’ Meeting October 20, 2016
- On-site T&TA, as needed
- DOE National Convention TBA
- Inspector’s Retreat TBA

Third Quarter (January — March):

- NASCSP Winter Conference TBA
- Kansas Weatherization Directors’ Meeting January 19, 2017
- On-site T&TA, as needed
- Kansas State Plan Meeting February, 2017

Fourth Quarter (April — June):

- PAC Meeting March, 2017
- Kansas Weatherization Directors’ Meeting April 6, 2017
- On-site T&TA, as needed
- Inspector’s Retreat May, 2017

V.9 ENERGY CRISIS AND DISASTER RESPONSE PLAN

The K-WAP allows a great deal of flexibility in its program under normal operation. An energy crisis, such as the one caused by recent increases in fuel costs, offers Subrecipients the opportunity to use existing procedures to prioritize weatherization for households with no heating unit, households with unusually high energy costs, households with certain health and safety problems, or households with other emergencies such as extremely leaky homes.

During an energy crisis, K-WAP Subrecipients may consider any household an emergency that has no working furnace or whose furnace is tested unsafe, or that demonstrates its energy costs constitute a high burden, or whose energy consumption is unusually high. Classification as an emergency enables a Subrecipient to place that household at the top of the list for weatherization services.

As an emergency, the K-WAP Subrecipient may make emergency repairs, including furnace replacement and repair of serious air leaks, and schedule other needed repairs at a later date. If at all possible, the Subrecipient should complete the emergency units within the current program year. If it is not possible, however, the state will work with the Subrecipient agency to assure the work can be completed during the following program year.

The state will allow Subrecipients to purchase or lease temporary heating sources for use in energy crises. Subrecipients may use program funds for storage of the units and to increase liability insurance, as needed. Subrecipients will be responsible for maintaining the safety of the units.

As needed, the state may redirect funds from T&TA to provide additional allowable measures required to meet an energy crisis.

Kansas General Disaster Response Plan (Reference WPN 12-7):

Policy: For weatherization purposes, a disaster is determined by a Presidential or Gubernatorial order declaring either a Federal or State Emergency. The crisis may be naturally occurring or man-made and generally will involve at least three phases: the crisis itself, the clean-up, and the rebuilding of the affected area. It is not uncommon for weatherization work to be suspended during the crisis and early clean-up phase until basic community services such as electricity, water, food and medical supply activities can be returned closer to normal.

The disaster time period may be from several days to a month or more and this period can have a critical impact on program operations.

This “General Disaster Response Plan” addresses the needs of the affected low-income clients and also takes into consideration the limited funds available in weatherization.

Procedures:

- 1. General Disaster Response Plan:** A General Disaster Response Plan will include:
 - a. contact and coordination with the appropriate disaster site leadership in charge to explain the role and resources that weatherization can provide;
 - b. availability and use of grantee and/or local agency staff, equipment and resources;
 - c. consideration for the preservation of local agency (Subrecipient) weatherization files, records, materials and equipment if they would be at risk.
- 2. Notify A DOE Project Officer As Soon As Possible Regarding the Disaster:** Contact DOE staff by telephone, then provide a follow-up in writing (email is fine). Discussion by telephone allows DOE staff to explore ideas and options that may be available using weatherization resources and begin to explore whether the currently approved state plan adequately addresses the circumstances and possible proposed actions.
- 3. Assess Circumstances And Determine The Need To Develop And Submit An Event-Specific Disaster Response Plan:** Assess the needs of the affected Subrecipients, and identify potential assistance available from other Subrecipients in the network that may be willing to volunteer assistance.

Verbal agreements within the scope of the grant can be made to clarify details and expedite early action during the disaster and early stages of clean-up. The grantee shall follow-up with DOE staff on verbal understandings and agreements in writing (email) promptly afterward.

Event Specific Disaster Response Plan

The “Event Specific Disaster Response Plan” will provide as much of the applicable reporting element information upfront as available and establish the estimated timeframe and end-date for DOE assistance.

It will clearly specify when the reporting will be provided to DOE as part of the proposed disaster plan (i.e., 30 days after the approved end-date for DOE weatherization assistance.) If an extension of the end-date is requested, the request will indicate the circumstances and provide updated reporting information.

Examples of Eligible Activities:

- a. **Reweathering** - The Program Regulation allows any previously weatherized home “damaged by fire, flood or act of God” to be re-weatherized, without regard to date of weatherization, where local authorities deem the dwelling salvageable as well as habitable and if the damage to materials is not covered by insurance or some other form of compensation.
- b. **Health and Safety** - In the normal course of weatherization or re-weatherization, the cost of eliminating health and safety hazards, elimination of which is necessary before the installation of weatherization materials or the result of weatherization activities, is allowable. To the extent that the services are in support of eligible weatherization work, such expenditure would be allowable. For example, debris removal at a dwelling unit so that the unit can be weatherized would be an allowable cost. Please note that the average cost per dwelling unit limit continues to apply.
- c. **Incidental Repairs** – In the normal course of weatherization or re-weatherization, the cost of incidental repair costs to protect or aid in the installation of weatherization materials and are part of the total allowable expenditure. All incidental repair costs shall be documented as such in the client files and be tied to an energy conservation measure or group of measures. The overall cost must receive and SIR of 1+. Incidental repair costs may not exceed a maximum of \$500 per dwelling unit for labor and materials.
The Subrecipients may exceed the \$500 limit, if certain requirements are met, by submitting a written waiver request to the KHRC/WAP staff for written approval. The written request must include the total amount to be expended and must include the REM/Design audit to insure that the overall group of measures receives and SIR of 1+. The written request for a waiver can be submitted by e-mail as long as all pertinent information is submitted to KHRC/WAP staff for approval.
- d. **Protection of DOE investment**- Weatherization personnel can be paid from DOE funds to perform functions related to protecting the DOE investment. Such activities include: securing weatherization materials, tools, equipment, weatherization vehicles, or protection of local agency weatherization files, records and the like during the initial phase of the disaster response. Using DOE funds to pay for weatherization personnel to perform relief work in the community as a result of a disaster is not allowable.

Local agencies may use weatherization vehicles and/or equipment to help assist in disaster relief provided the WAP is reimbursed according to the Financial Assistance Regulations 2 CFR 200.

- e. Priority – It would be permissible to consider households located in the disaster area, as a priority as long as the households are eligible and meet one of the priorities established in regulation and are free and clear of any insurance claim or other form of compensation resulting from damage incurred from the disaster. Inclusion of these households as a priority must be outlined in the Disaster Response Plan.

Summary Statement

Planning and Reporting Elements: If the General Disaster Response Plan is utilized and/or an Event-Specific Disaster Response Plan is approved, the grantee will report to the DOE Project Officer on the use of Weatherization resources and the DOE grant will include, at a minimum:

- a. A description of the disaster including the counties/local weatherization agencies affected. It will include the state emergency management website that tracks disasters;
- b. A description of the types of DOE weatherization assistance, the scope and costs of weatherization activities performed.
- c. The timeframe of the disaster. The date it started, when it was declared a disaster, and the (proposed or approved) end-date for DOE weatherization assistance;
- d. An explanation of how disaster-related costs are being tracked by type of activity and summary of DOE disaster-related expenditures and programmatic reporting information. For example, the number of homes and persons assisted under the Disaster Response Plan provisions;
- e. Any other applicable items as determined by KHRC or DOE.

Reporting will be sent to the DOE Project Officer by email.