Disclaimer

Attached is a draft of the 2019 DOE WAP State Plan that was approved by the TDHCA Governing Board on February 21, 2019. This draft incorporates changes made by the Board as a result of public comment at the meeting. This document, including its preamble, is scheduled to be published in the March 8, 2019 edition of the Texas Register and that published version will constitute the official version for purposes of public comment. The version herein is informational only and should not be relied upon as the basis for public comment.

Public Comment

Public Comment Period: Starts: 8AM Austin local time on March 8, 2019 Ends: 5PM Austin local time on March 29, 2019

Comments received after 5PM Austin local time on March 29, 2019 will not be accepted.

Written comments may be submitted, in hard copy/fax or electronic formats to:

Texas Department of Housing and Community Affairs
Attn: Gavin Reid
P.O. Box 13941
Austin, Texas 78711-3941
Fax: 512-475-3935
Email: gavin.reid@tdhca.state.tx.us

Written comments may be submitted in hard copy, fax, or email formats within the designated public comment period. Those making public comment are encouraged to reference the specific draft rule, policy, or plan related to their comment as well as a specific reference or cite associated with each comment.

Please be aware that all comments submitted to the TDHCA will be considered public information.
**APPLICATION FOR FEDERAL ASSISTANCE SF-424**

1. **Type of Submission:**
   - [ ] Preapplication
   - [X] Application
   - [ ] Changed/Corrected Application

2. **Type of Application:**
   - [ ] New
   - [X] Continuation
   - [ ] Revision
   - If Revision, select appropriate letter(s):

3. **Date Received:**

4. **Applicant Identifier:**

5a. **Fed Entity Identifier:**

5b. **Federal Award Identifier:**
   - DE-EE0007952

6. **Date Received by State:**
   - 07/01/2019

7. **State Application Identifier:**
   - TX-W-200

8. **APPLICANT INFORMATION:**
   - **a. Legal Name:** State of Texas
   - **b. Employer/Taxpayer Identification Number (EIN/TIN):** 742610542
   - **c. Organizational DUNS:** 806781902
   - **d. Address:**
     - Street 1: P.O. BOX 13941
     - City: Austin
     - County: TX
     - State: TX
     - Province: U.S.A.
     - Zip / Postal Code: 787113941
   - **e. Organizational Unit:**
     - Department Name: Texas Department of Housing and Community Affairs
     - Division Name: Community Affairs Division
   - **f. Name and contact information of person to be contacted on matters involving this application:**
     - **Prefix:** Mr
     - **First Name:** Michael
     - **Middle Name:**
     - **Last Name:** DeYoung
     - **Suffix:**
     - **Title:** Community Affairs Division Director
     - **Organizational Affiliation:** Texas Dept. of Housing and Community Affairs
     - **Telephone Number:** 5124752125
     - **Fax Number:** 5124753935
     - **Email:** michael.deyoung@tdhca.state.tx.us
## 9. Type of Applicant:
- A State Government

## 10. Name of Federal Agency:
- U. S. Department of Energy

## 11. Catalog of Federal Domestic Assistance Number:
- 81.042
- CFDA Title:
  - Weatherization Assistance Program

## 12. Funding Opportunity Number:
- DE-WAP-0002019
- Title:
  - 2019 Weatherization Assistance Program

## 13. Competition Identification Number:
- Title:

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

## 15. Descriptive Title of Applicant's Project:
- Provide Statewide Weatherization Assistance
APPLICATION FOR FEDERAL ASSISTANCE SF-424

16. Congressional District Of:
   a. Applicant: Texas Congressional District 01
   b. Program/Project: TX-Statewide

17. Proposed Project:
   a. Start Date: 07/01/2018
   b. End Date: 06/30/2020

18. Estimated Funding ($):
   a. Federal 6,811,752.00
   b. Applicant 0.00
   c. State 0.00
   d. Local 0.00
   e. Other 0.00
   f. Program Income 0.00
   g. TOTAL 6,811,752.00

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

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

21. By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to  
   I AGREE

   ** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency

Authorized Representative:
Prefix: Mr
First Name: David
Middle Name: 
Last Name: Cervantes
Suffix: 
Title: Acting Director

Signature of Authorized Representative: 
Authorized for Local Reproduction
Date Signed: 
Telephone Number: 512475
Fax Number: 5124753858
Email: david.cervantes@tdhca.state.tx.us

Standard Form 424 (Revised 10/2005)
Prescribed by OMB Circular A-102
BUDGET INFORMATION - Non-Construction Programs

<table>
<thead>
<tr>
<th>1. Program/Project Identification No.</th>
<th>EE0007952</th>
</tr>
</thead>
<tbody>
<tr>
<td>2. Program/Project Title</td>
<td>Weatherization Assistance Program</td>
</tr>
<tr>
<td>3. Name and Address</td>
<td>State of Texas</td>
</tr>
<tr>
<td></td>
<td>P.O. BOX 13941</td>
</tr>
<tr>
<td></td>
<td>Austin, TX 787113941</td>
</tr>
<tr>
<td>4. Program/Project Start Date</td>
<td>07/01/2018</td>
</tr>
<tr>
<td>5. Completion Date</td>
<td>06/30/2020</td>
</tr>
</tbody>
</table>

**SECTION A - BUDGET SUMMARY**

<table>
<thead>
<tr>
<th>Grant Program Function or Activity</th>
<th>Federal Catalog No.</th>
<th>Estimated Unobligated Funds</th>
<th>New or Revised Budget</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>(a)</td>
<td>(c)</td>
<td>(e)</td>
</tr>
<tr>
<td></td>
<td>(b)</td>
<td>(d)</td>
<td>(f)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>1. 2019 WAP Formula Funds</td>
<td>81.042</td>
<td>$750,000.00</td>
<td>$6,811,752.00</td>
</tr>
<tr>
<td>2. STATE</td>
<td></td>
<td>$0.00</td>
<td>$0.00</td>
</tr>
<tr>
<td>3.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. TOTAL</td>
<td></td>
<td>$750,000.00</td>
<td>$6,811,752.00</td>
</tr>
</tbody>
</table>

**SECTION B - BUDGET CATEGORIES**

<table>
<thead>
<tr>
<th>6. Object Class Categories</th>
<th>Grant Program, Function or Activity</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1) GRANTEE ADMINISTRATION</td>
<td>(2) SUBGRANTE ADMINISTRATION</td>
<td>(3) GRANTEE T&amp;TA</td>
</tr>
<tr>
<td>a. Personnel</td>
<td>$180,430.00</td>
<td>$0.00</td>
</tr>
<tr>
<td>b. Fringe Benefits</td>
<td>$62,790.00</td>
<td>$0.00</td>
</tr>
<tr>
<td>c. Travel</td>
<td>$0.00</td>
<td>$0.00</td>
</tr>
<tr>
<td>d. Equipment</td>
<td>$0.00</td>
<td>$0.00</td>
</tr>
<tr>
<td>e. Supplies</td>
<td>$3,000.00</td>
<td>$0.00</td>
</tr>
<tr>
<td>f. Contract</td>
<td>$0.00</td>
<td>$503,918.00</td>
</tr>
<tr>
<td>g. Construction</td>
<td>$0.00</td>
<td>$0.00</td>
</tr>
<tr>
<td>h. Other Direct Costs</td>
<td>$12,272.00</td>
<td>$0.00</td>
</tr>
<tr>
<td>i. Total Direct Charges</td>
<td>$258,492.00</td>
<td>$503,918.00</td>
</tr>
<tr>
<td>j. Indirect Costs</td>
<td>$82,096.00</td>
<td>$0.00</td>
</tr>
<tr>
<td>k. Totals</td>
<td>$340,588.00</td>
<td>$503,918.00</td>
</tr>
<tr>
<td>7. Program Income</td>
<td>$0.00</td>
<td>$0.00</td>
</tr>
</tbody>
</table>
## BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No.  
   EE0007952

2. Program/Project Title  
   Weatherization Assistance Program

3. Name and Address  
   State of Texas  
   P.O. BOX 13941  
   Austin, TX 78713941

4. Program/Project Start Date  
   07/01/2018

5. Completion Date  
   06/30/2020

### SECTION A - BUDGET SUMMARY

<table>
<thead>
<tr>
<th>Grant Program Function or Activity</th>
<th>Federal Catalog No. (b)</th>
<th>Estimated Unobligated Funds</th>
<th>New or Revised Budget</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>(c)</td>
<td>(d)</td>
<td>(e)</td>
</tr>
<tr>
<td>1.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>2.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>3.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>5. TOTAL</td>
<td>$ 750,000.00</td>
<td>$ 0.00</td>
<td>$ 6,811,752.00</td>
</tr>
</tbody>
</table>

### SECTION B - BUDGET CATEGORIES

<table>
<thead>
<tr>
<th>6. Object Class Categories</th>
<th>Grant Program, Function or Activity</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>(1) PROGRAM OPERATIONS</td>
<td>(2) HEALTH AND SAFETY</td>
<td>(3) LIABILITY INSURANCE</td>
</tr>
<tr>
<td>a. Personnel</td>
<td>$ 0.00</td>
<td>$ 0.00</td>
</tr>
<tr>
<td>b. Fringe Benefits</td>
<td>$ 0.00</td>
<td>$ 0.00</td>
</tr>
<tr>
<td>c. Travel</td>
<td>$ 0.00</td>
<td>$ 0.00</td>
</tr>
<tr>
<td>d. Equipment</td>
<td>$ 0.00</td>
<td>$ 0.00</td>
</tr>
<tr>
<td>e. Supplies</td>
<td>$ 0.00</td>
<td>$ 0.00</td>
</tr>
<tr>
<td>f. Contract</td>
<td>$ 4,771,271.00</td>
<td>$ 841,988.00</td>
</tr>
<tr>
<td>g. Construction</td>
<td>$ 0.00</td>
<td>$ 0.00</td>
</tr>
<tr>
<td>h. Other Direct Costs</td>
<td>$ 0.00</td>
<td>$ 0.00</td>
</tr>
<tr>
<td>i. Total Direct Charges</td>
<td>$ 4,771,271.00</td>
<td>$ 841,988.00</td>
</tr>
<tr>
<td>j. Indirect Costs</td>
<td>$ 0.00</td>
<td>$ 0.00</td>
</tr>
<tr>
<td>k. Totals</td>
<td>$ 4,771,271.00</td>
<td>$ 841,988.00</td>
</tr>
<tr>
<td>7. Program Income</td>
<td>$ 0.00</td>
<td>$ 0.00</td>
</tr>
<tr>
<td>Subgrantee (City)</td>
<td>Planned Funds/Units</td>
<td></td>
</tr>
<tr>
<td>---------------------------------------------------------------------------------</td>
<td>---------------------</td>
<td></td>
</tr>
<tr>
<td>Alamo Area Council of Governments (San Antonio)</td>
<td>$550,329.00</td>
<td></td>
</tr>
<tr>
<td>BakerRipley (Houston)</td>
<td>$829,971.00</td>
<td></td>
</tr>
<tr>
<td>Big Bend Community Action Committee (Marfa)</td>
<td>$109,607.00</td>
<td></td>
</tr>
<tr>
<td>Brazos Valley Community Action Program (College Station)</td>
<td>$231,859.00</td>
<td></td>
</tr>
<tr>
<td>Combined Community Action, Inc. (Giddings)</td>
<td>$158,633.00</td>
<td></td>
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<tr>
<td>Community Action Committee of Victoria Texas (Victoria)</td>
<td>$211,577.00</td>
<td></td>
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<tr>
<td>Community Action Corporation of South Texas (Alice)</td>
<td>$742,391.00</td>
<td></td>
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<tr>
<td>Community Council of South Central Texas, Inc (Seguin)</td>
<td>$146,901.00</td>
<td></td>
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<tr>
<td>Concho Valley Community Action Agency (San Angelo)</td>
<td>$135,376.00</td>
<td></td>
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<tr>
<td>Dallas County Health &amp; Human Services (Dallas)</td>
<td>$530,939.00</td>
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<tr>
<td>Economic Opportunities Advancement Corporation (Waco)</td>
<td>$200,449.00</td>
<td></td>
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<tr>
<td>El Paso Community Action Program, Project Bravo (El Paso)</td>
<td>$310,844.00</td>
<td></td>
</tr>
<tr>
<td>Fort Worth, City of (Fort Worth)</td>
<td>$332,690.00</td>
<td></td>
</tr>
<tr>
<td>Greater East Texas Community Action Program (Nacogdoches)</td>
<td>$614,625.00</td>
<td></td>
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<tr>
<td>Hill Country Community Action Association, Inc. (San Saba)</td>
<td>$191,757.00</td>
<td></td>
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<tr>
<td>Nueces County Community Action Agency (Corpus Christi)</td>
<td>$123,422.00</td>
<td></td>
</tr>
<tr>
<td>Panhandle Community Services (Amarillo)</td>
<td>$194,966.00</td>
<td></td>
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<tr>
<td>Rolling Plains Management Corporation (Crowell)</td>
<td>$293,195.00</td>
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<tr>
<td>South Plains Community Action Association, Inc. (Levelland)</td>
<td>$178,585.00</td>
<td></td>
</tr>
<tr>
<td>Texoma Council of Governments (Sherman)</td>
<td>$358,440.00</td>
<td></td>
</tr>
<tr>
<td>Travis County Health and Human Services and Veterans Services (Austin)</td>
<td>$212,875.00</td>
<td></td>
</tr>
<tr>
<td>West Texas Opportunities (Lamesa)</td>
<td>$193,096.00</td>
<td></td>
</tr>
<tr>
<td><strong>Total:</strong></td>
<td><strong>$6,852,527.00</strong></td>
<td></td>
</tr>
</tbody>
</table>

(Grant Number: EE0007952, State: TX, Program Year: 2019)
IV.2 WAP Production Schedule

<table>
<thead>
<tr>
<th>Weatherization Plans</th>
<th>Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Units (excluding reweatherized)</td>
<td>877</td>
</tr>
<tr>
<td>Reweatherized Units</td>
<td>0</td>
</tr>
</tbody>
</table>

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

Average Unit Costs, Units subject to DOE Project Rules

<table>
<thead>
<tr>
<th>VEHICLE &amp; EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)</th>
</tr>
</thead>
<tbody>
<tr>
<td>A Total Vehicles &amp; Equipment ($5,000 or more) Budget</td>
</tr>
<tr>
<td>B Total Units Weatherized</td>
</tr>
<tr>
<td>C Total Units Reweatherized</td>
</tr>
<tr>
<td>D Total Dwelling Units to be Weatherized and Reweatherized (B + C)</td>
</tr>
<tr>
<td>E Average Vehicles &amp; Equipment Acquisition Cost per Unit (A divided by D)</td>
</tr>
</tbody>
</table>

AVERAGE COST PER DWELLING UNIT (DOE RULES)

| F Total Funds for Program Operations                      | $4,771,271.00 |
| G Total Dwelling Units to be Weatherized and Reweatherized (from line D) | 877 |
| H Average Program Operations Costs per Unit (F divided by G) | $5,440.45 |
| I Average Vehicles & Equipment Acquisition Cost per Unit (from line E) | $0.00 |
| J Total Average Cost per Dwelling (H plus I)              | $5,440.45 |

IV.3 Energy Savings

Method used to calculate savings: ☑ WAP algorithm ☐ Other (describe below)

<table>
<thead>
<tr>
<th>Units</th>
<th>Savings Calculator (MBtus)</th>
<th>Energy Savings</th>
</tr>
</thead>
<tbody>
<tr>
<td>This Year Estimate</td>
<td>877</td>
<td>29.3</td>
</tr>
<tr>
<td>Prior Year Estimate</td>
<td>871</td>
<td>29.3</td>
</tr>
<tr>
<td>Prior Year Actual</td>
<td>281</td>
<td>29.3</td>
</tr>
</tbody>
</table>

Method used to calculate savings description:

IV.4 DOE-Funded Leveraging Activities

N/A

IV.5 Policy Advisory Council Members

☐ Check if an existing state council or commision serves in this category and add name below

<table>
<thead>
<tr>
<th>Combined Community Action Inc. T</th>
<th>Type of organization: Non-profit (not a financial institution)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contact Name: Kelly Franke</td>
<td>Phone: (979)540-2985</td>
</tr>
<tr>
<td>Email: <a href="mailto:KJFranke@ccaction.com">KJFranke@ccaction.com</a></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Greater East Texas Community Action Program</th>
<th>Type of organization: Non-profit (not a financial institution)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contact Name: Karen Swenson, Executive Director</td>
<td>Phone: (936)564-2491</td>
</tr>
<tr>
<td>Email: <a href="mailto:kswenson@sbcglobal.net">kswenson@sbcglobal.net</a></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Health and Human Services Commission</th>
<th>Type of organization: Unit of State Government</th>
</tr>
</thead>
<tbody>
<tr>
<td>Contact Name: Toni Packard</td>
<td>Phone: 5124384290</td>
</tr>
<tr>
<td>Email: <a href="mailto:toni.packard@hhsc.state.tx.us">toni.packard@hhsc.state.tx.us</a></td>
<td></td>
</tr>
</tbody>
</table>
IV.6 State Plan Hearings (Note: attach notes and transcripts to the SF-424)

<table>
<thead>
<tr>
<th>Date Held</th>
<th>Newspapers that publicized the hearings and the dates the notice ran</th>
</tr>
</thead>
<tbody>
<tr>
<td>04/25/2019</td>
<td>Final DOE State Plan and list of awardees to be presented at TDHCA Board of Directors meeting for approval. The meeting will also serve as a Public Hearing.</td>
</tr>
<tr>
<td>03/20/2019</td>
<td>Public Hearing for the DOE State Plan begins at 2:00 pm (CST) in Room 320 at the Thomas Jefferson Rusk Building on 208 East 10th Street, Austin, Texas 78701.</td>
</tr>
<tr>
<td>02/22/2019</td>
<td>Draft State Plan and notice of public hearing posted on the TDHCA website; public listserv announcement sent announcing availability of draft State Plan and public hearing details.</td>
</tr>
<tr>
<td>03/29/2019</td>
<td>Comment period for the DOE State Plan ends at 5:00 pm (CST).</td>
</tr>
<tr>
<td>02/21/2019</td>
<td>TDHCA Board of Directors authorizes release of draft State Plan for public comment.</td>
</tr>
<tr>
<td>03/29/2019</td>
<td>WAPAC meeting regarding DOE State Plan.</td>
</tr>
</tbody>
</table>

IV.7 Miscellaneous

Recipient Business Officer
Michael De Young  
Michael.deyoung@tdhca.state.tx.us  
221 East 11th Street  
Austin, Texas 78701  
(512) 475-2125

Recipient Principal Investigator
Gavin Reid  
gavin.reid@tdhca.state.tx.us  
221 East 11th Street  
Austin, Texas 78701  
(512) 936-7828

Policy Advisory Council
The Policy Advisory Council ("PAC") is representative of organizations and agencies and provides balance, background, and sensitivity with respect to solving the problems of low-income persons, including weatherization and energy conservation problems. Historically, the PAC has met annually at the end of the public hearing period for the DOE plan.

The low-income elderly population is represented by the PAC members from Combined Community Action and the Greater East Texas Community Action Program. The low-income persons with disabilities population is represented by the PAC member from the Health and Human Services Commission.

Liability Insurance
The liability insurance separate line item includes pollution occurrence insurance in addition to the general liability insurance. Most regular liability insurance policies do not provide coverage for potential effects of many health and safety measures, such as lead disturbances and other pollution occurrence items. The Department strongly recommends the Subgrantees require their contractors to carry pollution occurrence insurance to avoid liability for any mistakes the contractors may make. Each Subgrantee should get a legal opinion regarding the best course to take for implementing the pollution occurrence insurance coverage.

2017 ACSI Action Plan (based on 2017 Survey)
Immediately after receiving the results of the 2017 ACSI, TDHCA met with the the Texas Association of Community Action Agencies (TACAA), which represents the network of WAP agencies, to analyze and discuss the results. With TACAA's input, TDHCA worked up a plan of action to address the concerns raised in the 2017 ACSI. The plan of action includes the following:

- Hosting workgroups to discuss client eligibility, weatherization best practices, reobligation/deobligation, production and to receive input on the Health and Safety portion of the State Plan
- Working more closely with TACAA to streamline communications and announcements to the network
- Adding updated information to the TDHCA website regarding WAP best practices and information received from the federal and state levels. Each time an update occurs, TDHCA sends an email to the network notifying them of the update
- Coordinating trainings for the network such as manufactured home insulation training throughout the state, HVAC and ASHRAE 62.2 training, CAZ testing
<table>
<thead>
<tr>
<th>Training and Making Available a Proctor for QCI Testing to the Network</th>
</tr>
</thead>
<tbody>
<tr>
<td>Offering Network Webinars, Conference Calls, Training for New Program Managers and New Executive Directors, and Individual Agency Trainings that are Personalized to the Specific Needs of That Agency</td>
</tr>
<tr>
<td>Providing Training and Technical Assistance via Individual Phone Calls and Emails</td>
</tr>
<tr>
<td>Working More Closely with the Compliance Division to Develop Guidance for Subrecipients and to Identify Training Needs Amongst Both Individual Agencies and the Network as a Whole</td>
</tr>
</tbody>
</table>
V.1 Eligibility
V.1.1 Approach to Determining Client Eligibility
Provide a description of the definition of income used to determine eligibility

Eligibility for program assistance is determined under the Federal Poverty Income Guidelines and calculated as described in 10 TAC §6.4.

Describe what household eligibility basis will be used in the Program

During the LIHEAP application process, households will be screened for DOE Weatherization benefits and determined eligible if their income is at or below 200% of the Federal Poverty Income Guidelines.

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

The Welfare Reform Act, officially referred to as the Personal Responsibility and Work Opportunity Act of 1996, H.R. 3734, placed specific restrictions on the eligibility of aliens for "Federal means-tested public benefits" for a period of five years. As defined in a Federal Register notice dated August 26, 1997 (62 FR 45256) the Department of Health and Human Services (HHS) is interpreting "Federal means-tested public benefits" to include only those benefits provided under Federal means-tested, mandatory spending programs. HHS Information Memorandum LIHEAP-IM-25 dated August 28, 1997, states that all qualified aliens, regardless of when they entered the U.S., continue to be eligible to receive assistance and services under the Low-Income Home Energy Assistance Program (LIHEAP) if they meet other program requirements.

To ensure program continuity between LIHEAP and DOE Weatherization for all Subgrantees operating both programs, the DOE Weatherization Assistance Program will follow the interpretation as adopted by HHS. The Department has provided training and will continue to provide training to those entities who have elected to use the SAVE system.

The DOE and LIHEAP WAP are in compliance with LIHEAP-IM-99-10, issued June 15, 1999, which states that weatherization in a multifamily building is not a covered activity for status verification.

V.1.2 Approach to Determining Building Eligibility
Procedures to determine that units weatherized have eligibility documentation

Subgrantees maintain a client file for each unit weatherized, including documented proof that the dwelling unit is an eligible dwelling unit as defined in 10 CFR §440.22. The Department determines that weatherized units have eligibility documentation during monitoring reviews.

Describe Reweatherization compliance

Texas limits reweatherization to 5% of all units weatherized. To ensure the cap is not exceeded, Subgrantees may not reweatherize a unit without prior approval from the Department.

Reweatherization will be allowed on units that have received weatherization prior to September 30, 1994. A new energy audit must be conducted on each unit reweatherized.

Units may be eligible for reweatherization under 10 TAC §6.403(h) which specifies:

Consistent with 10 CFR §440.18(e)(2), if a Dwelling Unit has been damaged by fire, flood, or act of God and repair of the damage to Weatherization materials is not paid for by insurance; or if a Dwelling Unit was partially weatherized under a federal program during the period September 30, 1975, through September
U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
STATE PLAN/MASTER FILE WORKSHEET
(Grant Number: EE0007952, State: TX, Program Year: 2019)

30, 1994, the Dwelling Unit may receive further financial assistance for Reweatherization.

Describe what structures are eligible for weatherization

10 TAC §6.2 and §6.403 includes the following definitions which describe structures eligible for weatherization:

Dwelling Unit--A house, including a stationary mobile home, an apartment, a group of rooms, or a single room occupied as separate living quarters.

Multifamily Dwelling Unit--A structure containing more than one Dwelling Unit.

Rental Unit--A Dwelling Unit occupied by a person who pays rent for the use of the Dwelling Unit.

Shelter--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.

Single Family Dwelling Unit--A structure containing no more than one Dwelling Unit.

Describe how Rental Units/Multifamily Buildings will be addressed

In accordance with 10 CFR §440.22(b)(3), the Department requires that Subgrantees keep on file procedures that address protection of renters' rights, to ensure:

- Written permission of the building owner or his agent before commencing work.
- Cash-in-kind contribution from building owner when feasible.
- Benefits of the services accrued primarily to the low-income tenants residing in such units.
- For a reasonable period of time after completion, the household will not be subjected to rent increases (unless those increases are demonstrably related to other matters other than the weatherization work performed).
  - There are adequate procedures whereby the Grantee can receive tenant complaints and owners can appeal, should rental increases occur.
- No undue or excessive enhancement shall occur to the value of the dwelling unit.
- To secure the federal investment and to address issues of eviction from and sale of property, per 10 CFR §440.22(c), Grantees may seek landlord agreement to placement of a lien (or other contractual restrictions) upon the property being weatherized.

The Department will abide by 10 CFR §440.22, ensuring that not less than 66% of the eligible building units (50% for duplexes and four-unit buildings, and certain eligible types of large multifamily buildings) are eligible units or will become eligible dwelling units within 180 days under a Federal, State or local government program for rehabilitating the building or making similar improvements. WPN 16-5 provides guidance on the review and verification required for Department of Housing and Urban Development (HUD), Department of Agriculture (USDA), and Low Income Housing Tax Credit (LIHTC) buildings. Assessments and client file documentation for rental units and multifamily units are also detailed in the Multifamily Weatherization Best Practice posted on the Department's website at http://www.tdhca.state.tx.us/community-affairs/wap/docs/WAP-BP-MFWeatherization.pdf.

Because large multifamily buildings (buildings containing 25 or more dwelling units or those with shared central heating (i.e. boilers) and/or shared cooling plants (i.e. cooling tower that use water as the coolant) regardless of the number of dwelling units) have different audit requirements, Subgrantees must obtain prior written approval through the Department to use the 50% eligibility, and DOE must approve the proposed activity. The Department will seek DOE approval.

Subgrantees must submit to the Department a request for permission to weatherize large multifamily buildings. Request for permission must include evidence of significant energy savings. A significant energy savings is defined as having an SIR of 1.0 or greater in the energy audit.

Describe the deferral Process

A Dwelling Unit shall not be weatherized when there is a potentially harmful situation that may adversely affect the occupants or the Subgrantee's weatherization crew and staff, or when a Dwelling Unit is found to have structural concerns that render the Dwelling Unit unable to benefit from weatherization. The Subgrantee must declare their intent to defer weatherization on an eligible unit on the assessment form. The assessment form must include the client's name and address, dates of the assessment, and the date on which the client was informed of the issue in writing. The written notice to the client must include a clear description of the problem, conditions under which weatherization could continue, the responsibility of all parties involved, and any rights or options the client has. A copy of...
the notice must be given to the client, and a signed copy placed in the client application file. Only after the issue has been corrected to the satisfaction of the Subgrantee shall weatherization work begin.

If structural concerns or health and safety issues identified (which would be exacerbated by any weatherization work performed) on an individual unit cannot be abated within program rules or within the allowable WAP limits, the unit exceeds the scope of this program.

Crewmembers or contractors who work on a unit that could or should be a deferral or walk-away do so at their own risk.

V.1.3 Definition of Children
Definition of children (below age): 18

V.1.4 Approach to Tribal Organizations
☐ Recommend tribal organization(s) be treated as local applicant?
If YES, Recommendation. If NO, Statement that assistance to low-income tribe members and other low-income persons is equal.

The 70th Texas Legislature created the Native American Restitutionary Program (Oil Overcharge Restitutionary Act, Texas Government Code, Chapter 2305) for the purposes of providing oil overcharge restitution to Texas Native Americans. In the Texas WAP, the Native-American Indian population is treated and served in the same manner as other applicants.

V.2 Selection of Areas to Be Served

The Texas WAP is available to eligible low-income households in all 254 counties of the state. Subgrantees are held responsible for all intake, eligibility, and weatherization activities. If the Subgrantee's performance record is satisfactory according to both state and federal regulations, then the Department may offer to renew the contract if the Subgrantee so desires. The Department's award committee may decline to recommend an award or place additional conditions on an award based upon its previous participation review as outlined in 10 TAC §1.302.

New or additional DOE subgrantees for counties that become unserved by the DOE WAP will be selected according to DOE regulations found in 10 CFR§440.15 and 10 TAC §1.302. If the Department determines it is necessary to permanently reassign a service area to a new subgrantee, the subgrantee will be chosen in accordance with 10 CFR §440.15. A new or additional subgrantee is defined as a CAA or other public or nonprofit entity that is not currently operating a Department-funded Weatherization Assistance Program. All counties are served by 22 existing entities.

(The Department may deobligate all or part of the funds provided under this contract as outlined in 10 TAC §6.405. A Subgrantee’s failure to expend the funds provided under this State plan in a timely manner may also result in the Subgrantee’s ineligibility to receive additional funding during the program year.)

Formula Distribution
The Department updates the budget allocation proportion by county and Subgrantee based on poverty income, elderly poverty, median household income (from the 2010 U.S. Census data), and climate data (from the National Climatic Data Center, Climate Normals, 2010), as outlined in 10 TAC §6.404.

The Department allocates funds to Subgrantees by applying a formula based upon the DOE allocation for program year; or if the allocation amount is not known, on an assumption of level funding from the previous program year. Once the allocation amount is known, the formula is re-run. The allocation formulas reflect the 2010 Census data. If any carryover funds are available, they will be distributed by allocation formula and used to increase the number of units to be weatherized. The Department will adjust guidance to reflect the adjusted average expenditure limit per unit for the program year.

The fund allocations for individual service areas are determined by a 5-factor distribution formula as outlined in 10 TAC §6.404:
(1) Number of non-elderly poverty households per county;
(2) Number of elderly poverty households per county;
(3) Median income variance per county;
(4) Inverse poverty household density ratio per county; and
(5) County Weather Factor (Heating/Cooling Degree days per county) as a portion of State County Weather.
V.3 Priorities for Service Delivery

The Department will ensure by contract that its Subgrantees give priority to weatherizing dwellings owned or occupied by low-income persons who are particularly vulnerable such as the Elderly, Persons with Disabilities, Families with Young Children, Households with High Energy Burden, and Households with High Energy Consumption. Applicants from these groups must be placed at the top of a Subgrantee's waiting list. The Department ensures that Subgrantees give proper attention to these requirements through monitoring/evaluation of the Subgrantee.

V.4 Climatic Conditions

The climatic conditions for the State of Texas are imbedded in the algorithms of the Weatherization Assistant (WA 8.9) energy audit software toll engineered by the Oak Ridge National Laboratory for the Department of Energy. As part of the energy audit modeling, the Department requires the Subgrantee Network to select the nearest weather station to the dwelling units. The Weather files imbedded in the WA 8.9 contains 30 year data of Heating and Cooling degree days for each weather station.

As described in the report prepared by the Pacific Northwest National Laboratory & Oak Ridge National Laboratory for the Department of Energy, the state of Texas has several IECC climate zones. http://apps1.eere.energy.gov/buildings/publications/pdfs/building_america/ba_climateguide_7_1.pdf These climate zones are used as an aid in helping Subgrantees to identify the appropriate climate designation for the counties in which they are providing WAP services. In addition to prescribing appropriate mechanical equipment (example of climate specific measures would be evaporative cooling which may be prescribed in the Hot Dry climate of Texas and not in the Mixed Humid part of Texas) the IRC prescriptive thermal envelope of measures are different. The climate zones found in Texas are as follows:

1. Hot-Humid

A hot-humid climate is defined as a region that receives more than 20 inches (50 cm) of annual precipitation and where one or both of the following occur:

- A 67°F (19.5°C) or higher wet bulb temperature for 3,000 or more hours during the warmest six consecutive months of the year; or
- A 73°F (23°C) or higher wet bulb temperature for 1,500 or more hours during the warmest six consecutive months of the year.

IRC Prescriptive Thermal Envelope Measures:

<table>
<thead>
<tr>
<th>Zone 2A and 2B</th>
<th>Zone 3A</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ceiling</td>
<td>R 38</td>
</tr>
<tr>
<td>Windows</td>
<td>U 0.40</td>
</tr>
<tr>
<td>Walls</td>
<td>R-13</td>
</tr>
<tr>
<td>Floors</td>
<td>R – 13</td>
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<tr>
<td>SHGC</td>
<td>0.25</td>
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<td></td>
<td>R38</td>
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<tr>
<td></td>
<td>U 0.35</td>
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<tr>
<td></td>
<td>R-13 + 5</td>
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<tr>
<td></td>
<td>R 19</td>
</tr>
<tr>
<td></td>
<td>0.25</td>
</tr>
</tbody>
</table>

2. Hot-Dry

A hot-dry climate is defined as a region that receives less than 20 inches (50 cm) of annual precipitation and where the monthly average outdoor temperature remains above 45°F (7°C) throughout the year.

IRC Prescriptive Thermal Envelope Measures:

<table>
<thead>
<tr>
<th>Zone 3A and 3B</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ceiling</td>
</tr>
<tr>
<td>Windows</td>
</tr>
<tr>
<td>Walls</td>
</tr>
</tbody>
</table>
3. Mixed-Humid

A mixed-humid climate is defined as a region that receives more than 20 inches (50 cm) of annual precipitation, has approximately 5,400 heating degree days (65°F basis) or fewer, and where the average monthly outdoor temperature drops below 45°F (7°C) during the winter months.

IRC Prescriptive Thermal Envelope Measures:

<table>
<thead>
<tr>
<th>Zone 3A</th>
<th>Ceiling</th>
<th>R 38</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Windows</td>
<td>U 0.35</td>
</tr>
<tr>
<td></td>
<td>Walls</td>
<td>R13 + 5</td>
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<tr>
<td></td>
<td>Floors</td>
<td>R 19</td>
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<tr>
<td></td>
<td>SHGC</td>
<td>.025</td>
</tr>
</tbody>
</table>

4. Mixed-Dry

A mixed-dry climate is defined as a region that receives less than 20 inches (50 cm) of annual precipitation, has approximately 5,400 heating degree days (50°F basis) or less, and where the average monthly outdoor temperature drops below 45°F (7°C) during the winter months.

IRC Prescriptive Thermal Envelope Measures:

<table>
<thead>
<tr>
<th>Zone 4</th>
<th>Ceiling</th>
<th>R 49</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Windows</td>
<td>U 0.35</td>
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<tr>
<td></td>
<td>Walls</td>
<td>R13 + 5</td>
</tr>
<tr>
<td></td>
<td>Floors</td>
<td>R 19</td>
</tr>
</tbody>
</table>

In addition to the 2015 IRC adopted by the State of Texas, several individual cities have adopted amendments to the code. The adoption and amendments to the 2015 IRC impact the WA 8.9 energy audits in that cities are required to evaluate user defined measures to meet the codes adopted by each individual City.

V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials

Technical Guides and Materials

http://www.tdhca.state.tx.us/community-affairs/wap/guidance.htm

Weatherization Tools and Guides

- **WAP Production Schedule/Tool (XLS)** – Revised 12.30.16
- **Weatherization Assistance (NEAT) – Student Guide (PDF)** - Revised 7.1.18
- **Single-Family Homes: Standard Work Specifications Field Guide (PDF)** - Revised 7.1.18
- **Manufactured Housing: Standard Work Specifications Field Guide (PDF)** - Revised 7.1.18
- **Weatherization FAQs Answered by TDHCA (PDF)** – Revised 10.20.17
- **DOE-WAP Timeline (PDF)** Revised 10.30.15
- **LIHEAP-WAP Timeline (PDF)** Revised 10.30.15
- **Weatherization Field Guide (2010)**
- **Mechanical Systems Field Guide (2010)**
- **Exhaust Fan Flow Meter Quick Guide (PDF)**
- **International Energy Conservation Code (IECC) Requirements (energycode.pnl.gov)**
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(Grant Number: EE0007952, State: TX, Program Year: 2019)

- Weatherization Reporting Instructions - Revised 7.11.18
- LIHEAP Performance Measures Module User Guide (PDF)
- Checking WAP Reports - Revised 7.11.18

Program Administration Forms

- DOE Budget Amendment Form (XLS)
- LIHEAP Budget Amendment Form (XLS)
- WAP Inventory List: Tools and Equipment (DOC fillable)
- Quality Control Inspection (QCI) Form

Assessment Calculators

- AC Replacement Calculator (XLS)
- Attic Ventilation Calculator (XLS)
- Degradation Calculator (XLS)
- Refrigerator Replacement Calculator (XLS)
- Sidewall Density Calculation Sheet (XLS)
- ASHRAE 62.2 Calculator (www.residentialenergydynamics.com)

Client and Field Assessment Forms

- QCI Final Inspection Certification Form (PDF)
- Health & Safety Client Questionnaire & Inspection Checklist (PDF)
- LIHEAP Priority List (PDF) – Revised July 2017
- Blower Door and Duct Blower Data Sheet (XLS)
- Unified Notification Form (PDF) – Revised July 2011
- Mold-Like Substance Notification and Release Form (PDF)
- Consumer Mold Information Sheet (PDF)
- Whole House Assessment Sheet (XLSX)
- Refrigerator Replacement Form (DOC fillable)
- Landlord Permission to Perform Assessment (PDF)
- Multi-Family Project Preparation/Completion Checklist (PDF)
- Wall/Attic Inspection Form (XLS)
- Building Weatherization Report (BWR) (XLS) – Revised January 2017

Further, the Department has several Weatherization Best Practices posted at: http://www.tdhca.state.tx.us/communityaffairs/wap/wapbestpractices.htm.

Best Practices are developed based upon repeat questions that require more clarity than simply an FAQ. These have proved highly effective in multiple ways: increased compliance, better understanding on how to assess and proceed, increased consistency across the Network, and reduction in calls for same issues. They often have multiple references and are based upon sound building science principles.

All Subrecipient agreements and vendor contracts active in PY 2015 and beyond contain language which clearly documents the SWS specifications for work quality outlined in WPN 15-4, Section 2. A signed contract shall confirm that the organization understands and agrees to these expectations. Each contract includes a substantially equivalent clause or exhibit:

Materials and Work Standards

A. Subrecipient shall weatherize eligible dwelling units using only weatherization materials which meet or exceed the standards prescribed by DOE in Appendix A of 10 CFR Part 440 and added approved materials noted in WPN 19.4.

B. All weatherization measures installed shall meet or exceed the standards prescribed by DOE in Weatherization Program Notice (WPN) 15-4 regarding Standard Work Specifications, as detailed in the Department’s Standard Work Specifications.

C. All weatherization work must be performed in accordance to the DOE approved energy audit procedures, 10 CFR Part 440 Appendix A, State of Texas adopted International Residential Code (or that of jurisdictions authorized by State law to adopt later editions).

Subgrantee will include the substance of this section in all subcontracts
V.5.2 Energy Audit Procedures

Audit Procedures and Dates Most Recently Approved by DOE

Single-Family: 6/15/2018
Manufactured Housing: 6/15/2018
Multi-Family: 

Audit Procedure: Single-Family
Audit Name: Other (specify)
NEAT: DOE Approved June 2, 2016
Approval Date: 10/5/2016

Audit Procedure: Manufactured Housing
Audit Name: Other (specify)
MHEA: DOE Approved June 2, 2016
Approval Date: 10/5/2016

Audit Procedure: Multi-Family
Audit Name: Other (specify)
NEAT: 5-24 individually heated and cooled units - DOE Approved June 2, 2016
Approval Date: 10/5/2016

Comments

V.5.3 Final Inspection

The Department has provided Subgrantees with sufficient T&TA funding to obtain and/or maintain required QCI and MF-QCI certifications by an IREC certified training provider. The Department tracks Subgrantee compliance with unit inspection requirements of WPN 15-4.

The Department has five certified QCI staff, who maintain their certifications. The Department annually requires all Subgrantees to report the following for determining the number of units that the Department will inspect for compliance at each agency:

- Option 1 (at minimum 5% compliance final inspection required) = With multiple QCI staff, this Subrecipient will NOT allow the QCI staff member who conducts the Final Inspection on any/every DOE-funded/reported unit to perform any other aspect(s) associated with that same unit.
  Example: Initial Assessment; NEAT Audit; Work Order; etc

- Option 2 (10% compliance final inspection required) = With limited QCI staff, this Subgrantee will have a QCI staff member conduct the Final Inspection on any/every DOE-funded/reported unit AND will also perform other aspect(s) associated with that same unit.
  Example: Initial Assessment; NEAT Audit; Work Order; etc

- Option 3 (5% compliance final inspection required) = This Subgrantee typically has an independent third-party QCI contractor.

- NOTE: As scheduling permits, compliance will conduct 10% final inspections on completed units for Options 1 and 3, as well.

Ten Subgrantees have multiple QCI Staff with separation of duties, eight have limited QCI, and four are using third-party QCIs. All units are inspected by a certified QCI. In addition to final inspections, a completed QCI Final Inspection Certification Form is required. QCI Final Inspection Certification Form (PDF).

Subgrantees are required to follow work standards as per the SWS guidelines. This requirement is within Subgrantee contracts, and the SWS guide is posted on the Department Program Guidance Webpage.

All units must meet DOE requirements and pass a QCI inspection. Any unit that fails to be brought into compliance results in disallowed costs and a finding for the reason(s) of the disallowed cost is issued in the monitoring report. The initial T&TA response to any findings is email guidance providing resources to resolve the findings by the training team. This is then followed by individualized T&TA, or a referral to the appropriate Tier 1 training provider, as deemed
V.6 Weatherization Analysis of Effectiveness

Pursuant to 10 TAC, Chapter 1, Subchapter C, §1.302, a review of a Subgrantee’s compliance history in Department programs must be approved by the Department’s Executive Award and Review Advisory Committee (EARAC) and provided to the Department’s Board of Directors in order that the Board may consider the compliance history and make and document its award decisions with full knowledge of these matters. Prior to the award of DOE funds to any Subgrantee, EARAC reviews:

1. Summary information regarding findings identified during the last three years; and
2. If the Subgrantee is subject to the requirement of an annual single audit:
   A. A report of any required single audit or single audit certification form that is currently past due;
   B. If such single audit has been submitted to the Federal Audit Clearinghouse; and
   C. If the most recent single audit report contained findings.

The Subrecipient Monitoring section, within the Compliance Division, submits information regarding its monitoring activity to EARAC. If EARAC finds that a Subgrantee has outstanding monitoring issues, their WAP award may be subject to conditions intended to avoid future noncompliance, and limit disallowed costs.

Issues identified during this review point to areas in a Subgrantee that require attention, both from a monitoring standpoint and a T&TA standpoint. The reviews not only hold the Subgrantee accountable, they also give the monitoring and T&TA sections guidance in planning future activities.

T&TA staff is copied on all monitoring reports and/or a staff meeting is held for monitors to debrief T&TA staff after each visit. In those meetings, monitoring staff relay issues found related to individual Subgrantee, as well as, overall trends identified. Following the monitoring report, T&TA staff provide initial email to Subgrantee to provide resources for identified issues. T&TA staff applies debrief information when determining the needs for agency-wide specific T&TA and to plan the curriculum for regional trainings.

Further, Subgrantee performance is reviewed periodically and at the end of the program year. The Department tracks subgrantee performance over time by reviewing their monthly production and expenditure reports. Subgrantees are required to submit a Production Report on the 15th of each month. If staff determines that a benchmark is missed or a subgrantee is falling behind on expenditure and/or production, a letter is issued from the Department and the subgrantee is required to submit a written Mitigation Action Plan.

Additionally, based upon monthly submitted performance and expenditures, individualized TA is provided to ensure full expenditure and an adequate rate of production. T&TA staff analyzes the reports submitted by subgrantees and provides T&TA when necessary. Such T&TA may include: a course on production oriented management, proper reporting, procurement, and/or other relevant topics.

Analysis of reports includes the following:

- Number of homes completed;
- Number of applications pending;
- Number of homes in progress;
- Contract amount;
- Total funds expended;
- Balance of funds; and
- Special comments

The Department enforces the Deobligation/Reobligation of Awarded Funds rule as laid out in TAC §6.405. While the Department's performance review process has not achieved full expenditure of funds each Program Year (e.g., PY 2017 due to Hurricane Harvey), the Department continuously assesses its processes and researches potential modifications in order to improve. For example, the Department has a Program Specialist who is tasked with the
responsibility of overseeing the performance and expenditure report and production schedule process and to provide technical assistance to individual subrecipients, conduct quarterly network calls for updates, and to address issues identified by Compliance.

V.7 Health and Safety

Attached to SF-424

V.8 Program Management

V.8.1 Overview and Organization

The Department is the state's lead agency responsible for affordable housing and community assistance programs. The Department annually administers funds derived from mortgage revenue bond financing and refinancing, federal grants, and federal tax credits.

In 1991, the 72nd Texas Legislature created the Department. The Department's enabling legislation combined programs from the Texas Housing Agency, the Community Development Block Grant Program from the Texas Department of Commerce, and the Texas Department of Community Affairs.

On September 1, 1992, two programs were transferred to the Department from the Texas Department of Human Services: the Low Income Home Energy Assistance Program and the Emergency Nutrition and Temporary Emergency Relief Program. Effective September 1, 1995, in accordance with House Bill 785, regulation of manufactured housing was transferred to the Department. In accordance with House Bill 7, effective September 1, 2002, the Community Development Block Grant and Local Government Services Programs were transferred to the newly created Office of Rural Community Affairs. Effective September 1, 2002, in accordance with Senate Bill 322, the Manufactured Housing Division became an independent entity administratively attached to TDHCA. As a state agency, the Department is under the authority of the Governor of the State of Texas.

The Department's services are offered through three program categories: Single Family Programs, Multifamily Finance Production, and Community Affairs, which administers the WAP.

The Department subcontracts with a network of Subgrantees that provide the WAP services. The network is comprised of community action agencies (CAAs), regional Councils of Government (COGs), and organizations in the other public or private nonprofit entity category (PPNPs). All network Subgrantees are provided a draft copy of the yearly weatherization state plan and a notice of the state public hearing. The Public and all Subgrantees are invited and encouraged to participate in the public comment process.

Historically, the regular weatherization program year ran from April through March. Starting PY 2015, the weatherization program year has run from July through June.

The Department will continue to administer the program through Subgrantees in accordance with 10 CFR §440.15 provisions and State regulations. If existing Subgrantees are successfully administering the Program, the Department will offer to renew the contract if the Subgrantee so desires and if grant funds are available. When the Department determines that an organization is not administering the program satisfactorily, it may take the following action:

- Correction of the problem(s) with training or technical assistance.
- Re-assignment of the service area (or service area portion) to another Department existing Subgrantee; or,
- Solicitation or selection of a new or additional Subgrantee in accordance with 10 CFR §440.15 provisions.

A new or additional Subgrantee is defined as a CAA or other public or nonprofit entity that is not currently operating a DOE Weatherization Assistance Program.

Consolidation/downsizing: Any downsizing will occur through normal attrition, through a Subgrantee's determination that it can no longer administer the program efficiently/effectively, or through the Department's determination that a Subgrantee can no longer administer the program efficiently/effectively.

Reassignment of service areas for just cause: In the event that a service area can no longer be served by a Subgrantee, the Department reserves the right to reassign service areas. If it appears necessary to permanently reassign the service area, a new Subgrantee may be chosen in an open, competitive solicitation process in accordance with 10 CFR §440.15, or the reassignment may become permanent.
V.8.2 Administrative Expenditure Limits

The Department will use 5% of its grant funds for state administration. An additional 5% will be distributed for local WAP field operations under contract. Contract funds are intended for local administration, liability insurance coverage, local fiscal audit, materials, labor, program support and health and safety measures. To help ensure that Subgrantees comply with the full and proper use of all the contract funds, written definitions are to be provided to Subgrantees on budget categories as deemed necessary. The Department has elected to provide the maximum allowable funds for Subgrantee administration to Subgrantees receiving less than $350,000, so it has not included procedures for deciding which Subgrantees will receive additional funds. This decision is based on the following factors:

- Subgrantees often have to rely on other programs for WAP outreach and other administrative support;
- Subgrantees have had to adjust budgeting to keep pace with cost-of-living increases -- staff salaries, fringe benefits, rent, postage, travel, etc.;
- The State of Texas is 877 miles from Northern to Southern tips, 834 miles from Eastern to Western tips, and is comprised of a total of 266,807 square miles. The extra geography that Subgrantees have to cover to serve all the area's clients equitably requires additional staff, staff time, postage and phone costs, and vehicle wear and maintenance. (Source of Mileage Data: Texas Department of Transportation);
- Salaries, space, utilities, telephone, and similar costs associated with program support personnel should be charged to program support; and
- The increasing cost of maintaining appropriate qualified staff is challenging.

For Subgrantees receiving over $350,000, the administrative allowance will be 5% of each subgrant. For Subgrantees receiving less than $350,000, the administrative allowance will be 10% of each subgrant.

V.8.3 Monitoring Activities

The Department will monitor the Weatherization Assistance Program (“WAP”) with the Monitoring staff included in the budget. Subgrantee is defined as an organization with whom the Department contracts and provides WAP funds.

Names and credentials of Department staff dedicated to monitoring DOE activities follow. Monitoring staff are paid out of Grantee Administration and the Grantee T&TA (see the Budget Explanation, Personnel line item, for detailed information on the percentages allocated from each budget category.

- Robert Moore - over 8 years of weatherization experience as a Texas WAP Subgrantee, QCI certified, BPI & Lead certified, OSHA30
- Chad Turner - over 18 years of weatherization experience as a Texas WAP Subgrantee, QCI certified, BPI & Lead certified, OSHA30
- Kevin Glienke – over 8 years of weatherization monitoring experience; BPI Certified; has attended DOE sponsored conferences; QCI certified.

(All staff listed above conduct fiscal/administrative and inspection monitoring activities)

Compliance Subrecipient Monitoring is staffed with nine additional monitors not dedicated to weatherization. All of these qualified monitors may be tasked with fiscal and programmatic activities though funds provided by this State plan.

The Department will monitor each of the DOE Subgrantees during the contract period which will be July 1, 2019 through June 30, 2020. Many of the DOE Subgrantees also receive funds through the Department of Health and Human Services Community Service Block Grant and Low Income Home Energy Assistance Program. Whenever possible, all three programs will be monitored during one visit to the Subgrantee.

(See attached PY2019 Tentative Monitoring Schedule)

The Department understands DOE's expectation and will conduct at least one on-site visit annually to each Subrecipient for technical and fiscal/administrative monitoring.

Financial and Administrative monitoring will include, at minimum, a review of the Subgrantee’s General Ledgers and policies and procedures (including procurement) as well as support documentation for reported expenditures. These documents will be reviewed to ensure compliance with DOE, Department and other applicable rules and regulations. The Department will monitor for eligibility through sampled client file reviews. Through sampled unit inspections, Department staff will monitor for installed measures that are allowable and meet or exceed DOE requirements. The Department will review whether charged measures were installed properly and determine compliance with health and safety procedures, client eligibility, energy audit procedures, client education...
Monitors may request copies of fiscal records/support documentation and perform a desk review to gauge the fiscal condition of the Subgrantee prior to onsite monitoring. In addition, as needed, monitors may perform a desk review of records requested but not provided during the onsite review and records requested to clarify issues identified during the onsite monitoring visit. The Department recognizes the requirement to issue the monitoring letter within 30 days of the review. The Department does not consider the review complete until receipt of information needed to ascertain compliance. Monitoring letters will be issued within 30 days of receipt of all necessary information.

Monitors may test that weatherization activities, including but not limited to: energy audits, energy conservation measures, incidental repair measures and health and safety measures are only performed by properly trained Retrofit Installer/Technicians, Crew Leaders, and Energy Auditors that have received comprehensive training (not necessarily certification) that is aligned with DOE's Job Task Analysis for the position in which the weatherization worker is employed.

The Department will issue monitoring reports within 30 days of completion of the review. Subgrantees are provided a 30 day corrective action period to respond and provide evidence of correction. On a case by case basis, the Department may grant an extension to respond to the report if there is good cause and the request is made during the corrective action period. The Department will review each sampled QCI final inspection document to ensure compliance with the requirement to inspect 5% and will increase the required inspections if necessary.

The Department recognizes that there may be a need to perform additional unit inspections towards the end of the contract period to comply with the requirements of WPN 15-4 if there were not enough units available to sample during the full monitoring review.

(More frequent monitoring visits (Fiscal/Administrative and/or Technical) may be conducted at Subgrantees with significant identified risk)

Monitors will complete evaluation instruments to determine a Subgrantee’s compliance. The instruments cover Financial and Administrative requirements, health and safety procedures, client eligibility, energy audit procedures, client education procedures, and compliance with the SWS. Compliance Monitors also review the hard copy of the NEAT or MHEA audit which is required to be in the client file to assure that the scope of the work was directed by the audit.

Monitors scan documents as support if there will be findings noted. The following list provides additional monitoring details that may occur during the monitoring review.

- Monitors may request copies of fiscal records/support documentation and perform a desk review to gauge the fiscal condition of the Subgrantee prior to onsite monitoring.

- In addition, as needed, monitors may perform a desk review of records requested but not provided during the onsite review and records requested to clarify issues identified during the onsite monitoring visit. The Department recognizes the requirement to issue the monitoring letter within 30 days of the review. The Department does not consider the review complete until receipt of information needed to ascertain compliance. Monitoring letters will be issued within 30 days of receipt of all necessary information.

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1. Program Oriented Management Training – Prior to continuing any weatherization-related program activity, all Subgrantee staff that perform any action related to the WAP will be required to complete Program Oriented Management Training ("POM"). POM will include:

A. Review of WAP statutes and rules
B. Review of state program requirements
C. Review of financial and administrative best practices
D. Review of program best practices

2. Intensive Training and Technical Assistance – Once POM is completed, Subgrantee staff will receive training on critical program components. At each stage of Intensive T&TA, TDHCA team members will provide one-on-one guidance to Subgrantee staff to ensure the correct completion of each component. At the end of Intensive T&TA, Subgrantee staff will have completed another step toward completion a weatherized unit.

A. Client file documentation
B. Payment and reimbursement documentation
C. Accompanied unit assessment
D. Accompanied Audit completion
E. Accompanied Interim construction walk-through
F. Accompanied Final inspection

3. Staged Program Operation – When Subgrantee staff has completed Intensive T&TA, the Subgrantee will complete a pre-determined number of client intakes. Once the client intakes are completed, TDHCA team members will review the ensuing steps of the weatherization process in the following steps:

A. Review of the client file documentation
B. Review of unit assessments
C. Review of audit input and completion to work order
D. Accompanied final inspection

Once the Subgrantee has completed the determined number of units and the units have passed TDHCA monitoring, the Subgrantee will resume normal operations for the remainder of the program year. The Subgrantee will be reviewed in April of each year for determination of continued funding.

If it is determined that the Subgrantee is not able to administer the weatherization program, the Department will follow the requirements in 10 TAC §2.202 Contract Closeout.

V.8.4 Training and Technical Assistance Approach and Activities

The Department provides Subgrantees with sufficient T&TA funding to obtain and/or maintain required certifications; such as: QCI, MF-QCI, Building Analyst/Energy Auditor, Lead Safe Renovator, Lead Safe Worker, and OSHA 10 or 30. All training provided includes requirements for compliance with QWP specifications. The Department will conduct trainings based upon the following:

- Grant Requirements or as directed by DOE monitor or audit reports.
- Subgrantee Request. The Department has an online request system, with a T&TA menu list, or section for the Subgrantee to make a specific request or ask specific questions. The Department will contact the requestor and customize training to meet the need. [https://tdhca.wufoo.com/forms/request-for-ca-program-assistance](https://tdhca.wufoo.com/forms/request-for-ca-program-assistance)
  - In addition, submitted questions or requests are reviewed for creating FAQs or to identify topics for regional trainings, workshops, or individualized training.
Monitor Reports. The Department’s compliance team shares monitoring issues with the training team. The training team will initially provide resources and guides to address any findings, and follow up with T&TA as required.

- Trends across the Network will be addressed in regional trainings or workshops.

- Management Request. Management may make a specific request and dictate the type of training needed.

**Tier 1 Training:**

Tier 1 training will be provided by accredited IREC training providers. In compliance with Section 4 of WPN 15-4, the Department will track that comprehensive training for each job category (i.e., Retrofit Installer/Technician, Crew Leader, and Energy Auditor) is obtained within one year of being hired and that re-training occurs thereafter every three years. Whereas it is the responsibility of the Department to provide funds for training through IREC training providers, it is the responsibility of the Subgrantee to ensure training is completed by staff and/or subcontractors. Texas uses outside subcontractors to perform the weatherization measures. Historically, it has been difficult in Texas to find subcontractors to perform weatherization work. The Department will work to develop a plan to assure Subgrantees ensure their contractors obtain and maintain the required Tier 1 training certifications. The Department will monitor Subgrantee progress and track credentials. Weatherization staff may not function unsupervised until training and certification requirements are met.

The Department has five certified QCI staff who monitor and/or train weatherization Subgrantees on quality weatherization work, proper diagnostics, documentation, and compliance. The Department has two certified BPI Proctors who administer exams for BPI written exams. The Department continues to provide T&TA to assist Subgrantees in preparing for and obtaining required certifications. The Department created an online Web-page dedicated to Quality Work Plan requirements that contains guidance and resources. [http://www.tdhca.state.tx.us/community-affairs/wap/quality-work-plan.htm](http://www.tdhca.state.tx.us/community-affairs/wap/quality-work-plan.htm)

**NOTE:** New Mexico Energy Smart Academy partners with local Subgrantees to provide IREC certified courses in Texas including MFQCI and Energy Auditor.

** Tier 2 Training:**

Tier 2 training will be provided by Department training and technical assistance staff or its designee. With experience as Program Officers and Trainers, the staff has experience in Subgrantee monitoring, unit assessments, audits, materials installation, inspections, and the training and technical assistance that support each. The staff consists of:

- Laura Saintey – 10+ years’ experience in the construction industry and 8+ years’ experience in the WAP. QCI certified, Lead Safe Renovator, OSHA 10, BPI Building Analyst Professional, BPI Certified Proctor, and attended DOE sponsored conferences.
- Jason Gagne- 3+ year experience in the WAP, QCI certified BPI Building Analyst, Lead certified, OSHA 10, and attended DOE sponsored conferences.
- Kevin Glienke- 8+ years in weatherization monitoring and training, BPI certified, QCI certified, MF-QCI, and attended DOE sponsored conferences.
- Robert Moore- 8+ years of weatherization experience including as a Texas WAP Subgrantee, QCI certified, BPI & Lead certified, OSHA 30 and attended DOE sponsored conferences.
- Chad Turner- 18+ years of weatherization experience including as a Texas WAP Subgrantee, QCI certified, BPI & Lead certified, OSHA 30 and attended DOE sponsored conferences.

T&TA staff provide new manager training, monitoring report based training, and technical assistance for multiple WAP Subgrantees. New manager training is required within three months of being hired. Subgrantees may request new manager training through the online training request system (i.e., Wufoo). Another form of mandatory training are trainings that arise out of necessity due to monitoring issues. Subgrantees are monitored as described in V.8.3 Monitoring Activities of this Plan and results of those monitoring visits are shared with T&TA staff. Any issues as a result of a monitoring visit are analyzed by T&TA staff to determine how best to train the Subgrantee to resolve the issue(s).

Ramifications for non-compliance with Tier 1 training and/or Tier 2 training can be awards that contain condition(s) which the non-compliant Subgrantee must comply with in order to receive funding. Conditions can be minor (e.g., submittal of a credential to the Department) or severe (e.g., closely supervised final QCIs by Department training staff to determine quality of weatherization measures installed).

Training to execute the Health and Safety Plan will occur via quarterly conference calls via a webinar platform which typically include health and safety concerns. Additionally, training and technical assistance occur throughout the year at random intervals on a case by case basis originating by way of monitoring trends and reports and requests from Subgrantees for assistance. Finally, the Department also hosts a webinar at the beginning of each Program Year to assist Subgrantees in the implementation of the new DOE State Plan and Health and Safety Plan.

QCI testing was coordinated and hosted by the Department through one of its two BPI Proctors.

**Training Schedule 2019:**
Quarterly Phone Calls. Agendas will be evaluated for topics based upon need and identified areas of concern. Topics may include:

- Program Ramp-Up
- Production Schedules
- Upcoming training dates
- Relevant topics for the quarter
- Topics identified by compliance
- FAQs needing clarification
- Closeout and Reporting

Projected Dates for PY 2019 WAP Network Calls:

- August 2019
- November 2019
- February 2020
- May 2020

Online training opportunities are passed onto the Network via the state association e-newsletter, along with other notifications regarding outside conferences or workshops.

The Department has posted a link to the Energy Audit tutorial on the Department's website. Training staff will provide technical assistance on a one on one basis if necessary.

The Department will address two key topics for 2019. The Department has chosen to focus on the following:

- Quality work through initial assessments
- Continued emphasis on final QCIs

Regional Training locations (as needed):

- Austin
- Dallas
- Houston
- San Antonio
- El Paso

Evaluation of Training Activities

In order to evaluate compliance with the quality work specifications and the efficacy of its training activities, the training staff or its designee will review its training activities semiannually and compare those to the Subgrantee monitoring reports. Additionally, Subgrantees will be given the opportunity to provide feedback through online Training Evaluation. These evaluations are reviewed to make improvements to future provided T&TA. Training staff or its designee will conduct periodic surveys to solicit input from Subgrantees as to their training needs.

More specific training will be designed for each Agency based on the information prompting the request. TA will be documented by using the online training and technical assistance database. Additionally, for onsite T&TA visits, a report will be produced indicating Subgrantee staff present, materials and documents presented to the Subgrantee, and expected outcomes.

Should a Subgrantee hire a new weatherization coordinator, the Subgrantee will be required to notify the Department in writing within 30 days of the date of hiring the coordinator and request training. The Department will contact Subgrantees within 30 days of the date of notification to arrange for training. The Department hosts “New Manager/Executive Director” courses for all new staff who oversee WAP staff/crews upon request.

Program Evaluation

The Department utilizes an online contract system to collect expenditure and performance data from Subgrantees. Each Subgrantee is assigned to a trainer that monitors Subgrantee performance and expenditure on a quarterly basis utilizing dashboards. The Department developed a production tool to monitor expenditure and completed units on a monthly basis. Each month Subgrantees submit a monthly production report that is reviewed by a trainer. Trainer contacts Subgrantees regarding expenditure and performance each month.
Another method of evaluation is provided by the compliance division. The Department’s compliance staff provides the Subgrantees assigned trainer with a copy of the agency’s most recent monitor report, which is used to assess performance/expenditures and individualized training needs.

**Client Education**

The Department requires WAP Subgrantees to provide client education to each WAP client. Subgrantees are required to provide (at a minimum) educational materials in verbal and written format. Client education may include temperature strips that indicate the temperature in the room and energy savings materials, instructions for equipment operation and/or maintenance.

| Percent of overall trainings are Tier 1 trainings: | 25.0 |
| Percent of overall trainings are Tier 2 trainings: | 75.0 |

**Breakdown of funds spent**

| Percent of budget spent on auditor/QCI trainings: | 10.0 |
| Percent of budget spent on crew/installer trainings: | 3.0 |
| Percent of budget spent on management/financial trainings: | 20.0 |

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

n/a
WEATHERIZATION HEALTH AND SAFETY PLAN

TEXAS WEATHERIZATION
CONTACT INFORMATION

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Director of Community Affairs
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Austin, TX 78701
512-475-2125
michael.deyoung@tdhca.state.tx.us
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# Weatherization Grantee Health and Safety Plan

## 1.0 – General Information

Grantees are encouraged to enter additional information here that does not fit neatly in one of the other sections of this document.

Allowable Department of Energy (DOE) related health and safety (H&S) actions and expenditures are those necessary to maintain the physical well-being of both the occupants and/or weatherization workers where:

- Costs are reasonable as determined by The Department of Energy (DOE) in accordance with this approved Master Plan;
- The actions must be taken to effectively perform weatherization; or
- The actions are necessary as a result of weatherization work.

This plan will provide guidance to the Texas Weatherization Network. Health and Safety issues will be identified by Program Assessors during the initial assessment. Weatherization Crews (either subcontracted or in house) will perform the task(s) identified in the initial assessment and listed in the work order(s).

Weatherization agencies and their representatives, including subcontractors, are required to take all reasonable precautions against performing work on homes that will subject the occupants or themselves to health and/or safety risks. In cases where an occupant’s health is fragile, or an occupant has been identified to have a health condition, including allergies, and/or the crew work activities would themselves constitute a health and/or safety hazard, the occupant(s) at risk shall be required to leave during the performance of the work activities.

In cases where an occupant is identified as having an allergy to a specific weatherization material, that material will not be installed. If comparable alternative materials are available and the occupant has no known allergies to the alternative materials and they meet DOE regulations, crews/contractors may substitute the alternative material(s). If no safe alternative material meeting DOE standards is available, the measure shall not be installed. This must be well documented in the client file.

This health and safety plan is taken from a DOE approved template. The text at the top of the template is boilerplate language and may not always apply to activities described in TDHCA’s DOE plan. Capitalized terms in the Plan have definitions in Chapters 1, 2, or 6 of Part 1, Title 10 of the Texas Administrative Code.

## 2.0 – Budgeting

Grantees are encouraged to budget Health & Safety (H&S) costs as a separate category and, thereby, exclude such costs from the average cost per unit cost (ACPU) limitation. This separate category also allows these costs to be isolated from energy efficiency costs in program evaluations. Grantees are reminded that, if H&S costs are budgeted and reported under the program operations category rather than the H&S category, the related H&S costs must be included in the calculation of the ACPU and cost-justified through the approved energy audit.

Select which option is used below.

- Separate Health and Safety Budget ☑
- Contained in Program Operations □
3.0 – HEALTH AND SAFETY EXPENDITURE LIMITS

Pursuant to 10 CFR 440.16(h), Grantees must set H&S expenditure limits for their Program, providing justification by explaining the basis for setting these limits and providing related historical experience.

Low percentages should include a statement of what other funding is being used to support H&S costs, while larger percentages will require greater justification and relevant historical support. It is possible that these limits may vary depending upon conditions found in different geographical areas. These limits must be expressed as a percentage of the ACPU. For example, if the ACPU is $5,000, then an average expenditure of $750 per dwelling would equal 15 percent expenditures for H&S.

15 percent is not a limit on H&S expenditures but exceeding this amount will require ample justification. These funds are to be expended by the Program in direct weatherization activities. While required as a percentage of the ACPU, if budgeted separately, the H&S costs are not calculated into the per-house limitation. DOE strongly encourages using the table below in developing justification for the requested H&S budget amount. Each H&S measure the Grantee anticipates addressing with H&S funds should be listed along with an associated cost for each measure, and by using historical data the estimated frequency that each measure is installed over the total production for the year.

It is also recommend reviewing recent budget requests, versus expenditures to see if previous budget estimates have been accurate. The resulting “Total Average H&S Cost per Unit” multiplied by the Grantee’s production estimate in the Annual File should correlate to the H&S budget amount listed in the Grantee’s state plan.

Should a Grantee request to have more than 15 percent of Program Operations used for health and safety purposes, DOE will conduct a secondary level of review. DOE strongly encourages use of this H&S template and matrix to help expedite this process.
DOE PY2019 Health and Safety Measures Matrix*

*Below measures are actual data from Subgrantees; however, TDHCA believes cost and frequency to be too high and therefore has adjusted the Average Health & Safety Cost per Unit (highlighted in green below) to be more in line with what the Department believes based on historical data.

<table>
<thead>
<tr>
<th>Measure</th>
<th>Cost ($)</th>
<th>Frequency %</th>
<th>Auto Calc</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bath Ventilation</td>
<td>$130.00</td>
<td>20%</td>
<td>$26.00</td>
</tr>
<tr>
<td>Kitchen Ventilation</td>
<td>$395.00</td>
<td>20%</td>
<td>$79.00</td>
</tr>
<tr>
<td>Lead Safe Work, Renovation, Repair, Painting</td>
<td>$250.00</td>
<td>2%</td>
<td>$5.00</td>
</tr>
<tr>
<td>Energy Recovery Ventilator</td>
<td>$900.00</td>
<td>40%</td>
<td>$360.00</td>
</tr>
<tr>
<td>Plumbing Repair</td>
<td>$1,402.00</td>
<td>30%</td>
<td>$420.60</td>
</tr>
<tr>
<td>Furnace Replacement</td>
<td>$1,600.00</td>
<td>20%</td>
<td>$320.00</td>
</tr>
<tr>
<td>CAZ Construction</td>
<td>$386.00</td>
<td>2%</td>
<td>$7.72</td>
</tr>
<tr>
<td>CO Detector</td>
<td>$43.00</td>
<td>59%</td>
<td>$25.37</td>
</tr>
<tr>
<td>Smoke Alarms</td>
<td>$42.88</td>
<td>52%</td>
<td>$22.30</td>
</tr>
<tr>
<td>Gas Pipe/Gas Line</td>
<td>$1,750.00</td>
<td>4%</td>
<td>$70.00</td>
</tr>
<tr>
<td>HVAC Repair Trip Charge</td>
<td>$95.00</td>
<td>4%</td>
<td>$3.80</td>
</tr>
<tr>
<td>Lead Test</td>
<td>$55.00</td>
<td>86%</td>
<td>$47.30</td>
</tr>
<tr>
<td>Remove/Cap/Seal Bath Wall Heater</td>
<td>$73.25</td>
<td>29%</td>
<td>$21.24</td>
</tr>
<tr>
<td>Smart Exhaust Switch Air Cycler SE1</td>
<td>$90.00</td>
<td>86%</td>
<td>$77.40</td>
</tr>
<tr>
<td>Vent Exhaust Fan to Exterior</td>
<td>$150.00</td>
<td>89%</td>
<td>$133.50</td>
</tr>
<tr>
<td>Vent new furnace to code (all materials)</td>
<td>$182.50</td>
<td>11%</td>
<td>$20.08</td>
</tr>
<tr>
<td>Vent new space heater to code (all materials)</td>
<td>$200.83</td>
<td>7%</td>
<td>$14.06</td>
</tr>
<tr>
<td>Vent water heater to Code (all materials)</td>
<td>$200.83</td>
<td>43%</td>
<td>$86.36</td>
</tr>
<tr>
<td>Water heater building</td>
<td>$673.75</td>
<td>4%</td>
<td>$26.95</td>
</tr>
<tr>
<td>Wire to Light Switch with Existing Exhaust Fan</td>
<td>$56.25</td>
<td>25%</td>
<td>$14.06</td>
</tr>
<tr>
<td>Wire to Light Switch with No Existing Exhaust Fan</td>
<td>$110.00</td>
<td>68%</td>
<td>$74.80</td>
</tr>
<tr>
<td>Replace Shut-Off Valve</td>
<td>$180.00</td>
<td>4%</td>
<td>$7.20</td>
</tr>
<tr>
<td>Replace Drain Pan</td>
<td>$150.00</td>
<td>4%</td>
<td>$6.00</td>
</tr>
<tr>
<td>Run Temp and Pressure Line</td>
<td>$150.00</td>
<td>4%</td>
<td>$6.00</td>
</tr>
<tr>
<td>ASHRAE Exhaust Fan</td>
<td>$394.00</td>
<td>88%</td>
<td>$346.72</td>
</tr>
<tr>
<td>Vent Existing Exhaust Fan</td>
<td>$223.00</td>
<td>45%</td>
<td>$100.35</td>
</tr>
<tr>
<td>Type B Vent Pipe</td>
<td>$265.00</td>
<td>21%</td>
<td>$55.65</td>
</tr>
<tr>
<td>Hi Low Venting</td>
<td>$48.00</td>
<td>42%</td>
<td>$20.16</td>
</tr>
<tr>
<td>HVAC System Replacement</td>
<td>$4,284.00</td>
<td>21%</td>
<td>$899.64</td>
</tr>
<tr>
<td>Natural Gas Appliance Drip Leg</td>
<td>$59.00</td>
<td>15%</td>
<td>$8.85</td>
</tr>
<tr>
<td>Water heater replacement</td>
<td>$2,225.00</td>
<td>3%</td>
<td>$66.75</td>
</tr>
<tr>
<td>Remove Unvented Space Heater Cap Line</td>
<td>$150.00</td>
<td>3%</td>
<td>$4.50</td>
</tr>
<tr>
<td>Temperature Pressure Valve</td>
<td>$60.00</td>
<td>9%</td>
<td>$5.40</td>
</tr>
</tbody>
</table>

**Total Average H&S Cost per Unit:** 960

**Enter Estimated Production (Annual File IV.2 WAP Production Schedule):** 877

**Enter Estimate Program Operations Budget:** 4,771,271

**H&S Budget (Total Average H&S Cost Per Unit*Estimated Production):** 841,920

**Requested H&S Percentage Per Unit (H&S Budget/Program Operations):** 17.65
4.0 – INCIDENTAL REPAIR MEASURES

If Grantees choose to identify any H&S measures as incidental repair measures (IRMs), they must be implemented as such under the Grantee’s weatherization program in all cases – meaning, they can never be applied to the H&S budget category. In order to be considered IRMs, the measure must fit the following definition and be cost justified along with the associated efficiency measure;

Incidental Repairs means those repairs necessary for the effective performance or preservation of weatherization materials. Such repairs include, but are not limited to, framing or repairing windows and doors which could not otherwise be caulked or weather-stripped and providing protective materials, such as paint, used to seal materials installed under this program. (10 CFR 440 “Definitions”)

5.0 – DEFERRAL/REFERRAL POLICY

Deferral of services may be necessary if H&S issues cannot be adequately addressed according to WPN 17-06 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. If, in the judgment of the auditor, any conditions exist which may endanger the health and/or safety of the workers or occupants, the unit should be deferred until the conditions are corrected. Deferral may also be necessary where occupants are uncooperative, abusive, or threatening. Grantees must be specific in their approach and provide the process for clients to be notified in writing of the deferral and what conditions must be met for weatherization to continue. Grantees must also provide a process for the client to appeal the deferral decision to a higher level in the organization.

Grantee has developed a comprehensive written deferral/referral policy that covers both H&S, and other deferral reasons?

<table>
<thead>
<tr>
<th>Yes ☑</th>
<th>No □</th>
</tr>
</thead>
</table>

Where can this deferral/referral policy be accessed?

10 TAC RULE §6.415

6.0 – HAZARD IDENTIFICATION AND NOTIFICATION FORM(S)

Documentation forms must be developed that include at a minimum: the client’s name and address, dates of the audit/assessment and when the client was informed of a potential H&S issue, a clear description of the problem, a statement indicating if, or when weatherization could continue, and the client(s) signature(s) indicating that they understand and have been informed of their rights and options.

Documentation Form(s) have been developed and comply with guidance?

<table>
<thead>
<tr>
<th>Yes ☑</th>
<th>No □</th>
</tr>
</thead>
</table>
7.0 – HEALTH AND SAFETY CATEGORIES

For each of the following H&S categories identified by DOE:

- Explain whether you concur with existing guidance from WPN 17-06 and how that guidance will be implemented in your Program, if you are proposing an alternative action/allowability, or if the identified category will not be addressed and will always result in deferral. Alternatives must be comprehensively explained and meet the intent of DOE guidance.
- Where an Action/Allowability or Testing is “required” or “not allowed” through WPN 17-06, Grantees must concur, or choose to defer all units where the specific category is encountered.
- “Allowable” items under WPN 17-06 leave room for Grantees to determine if the category, or testing, will be addressed and in what circumstances.
- Declare whether DOE funds or alternate funding source(s) will be used to address the particular category.
- Describe the explicit methods to remedy the specific category.
- Describe what testing protocols (if any) will be used.
- Define minimum thresholds that determine minor and major repairs
- Identify minimum documentation requirements for at-risk occupants
- Discuss what explicit steps will be taken to educate the client, if any, on the specific category if this is not explained elsewhere in the Plan. Some categories, like mold and moisture, require client education.
- Discuss how training and certification requirements will be provided for the specific category. Some categories, like Lead Based Paint, require training.
- Describe how occupant health and safety concerns and conditions will be solicited and documented

Grantees may include additional H&S categories for their particular Programs. Additional categories must include, at a minimum, all of the same data fields as the DOE-provided categories. Two additional tables have been created to utilize.

7.1 – AIR CONDITIONING AND HEATING SYSTEMS

<table>
<thead>
<tr>
<th>Concurrence, Alternative, or Deferral</th>
</tr>
</thead>
<tbody>
<tr>
<td>Concurrency with Guidance ☑</td>
</tr>
<tr>
<td>Air Conditioning Unallowable Measure ☐</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Funding</th>
</tr>
</thead>
<tbody>
<tr>
<td>DOE ☐</td>
</tr>
</tbody>
</table>
How do you address unsafe or non-functioning primary heating/cooling systems?

“Red tagged”, inoperable, or nonexistent primary heating and/or cooling system replacement, repair, or installation is allowed due to extreme climate conditions in Texas for Vulnerable Populations.

Texas’ climate conditions include climate zones 2A, 2B, 3A, 3B, and 4B which can be described as Hot-Humid, Hot-Dry, and Mixed-Dry. This diversity in climate conditions requires Texas to have the flexibility to address all scenarios related to providing heating and cooling to Vulnerable Populations.

Subgrantee will use the ACCA approved Manual J to determine proper sizing of replacement heating and cooling appliances. All heating and cooling systems will be evaluated as an energy conservation measure before consideration as a health and safety measure.

If the heating/cooling system issue is determined to be beyond the scope of DOE WAP, weatherization agencies will defer the work and refer the client to other resource agencies who may be able to address the problem. Texas’ deferral policy and protocols shall always be strictly adhered to when deferring weatherization work. If the client is completely without cooling or heating, the weatherization agencies shall make a referral to an agency with funding that can provide Vulnerable Population clients with a portable air conditioner or temporary means of heat, such as a portable heat pump or blankets.

Texas requires HVAC system installation to follow local and state code and it must be performed by a licensed HVAC professional. Weatherization agencies may subcontract licensed HVAC companies/individuals to perform heating/cooling systems installations and repairs if they follow proper state procurement procedures.

When replacing a primary wood stove in a mobile/manufactured home the new unit must be listed for use with manufactured homes, and must be installed in accordance with their listings. Units that are not manufacturer approved, discovered during an initial assessment, should be replaced with an approved manufactured home appliance, under H&S. All state and local codes must be followed.

Vented space heaters shall be treated as furnaces. Combustion safety testing is required when combustion appliances are present. Weatherization Assessors and Final Inspectors must conduct the combustion appliance safety inspection. This includes all of the following: carbon monoxide testing, draft measurement, spillage evaluation, worst case depressurization of the combustion appliance zone (CAZ), a safe flue pipe, chimney or vent, adequate combustion air, and gas leakage as applicable. Combustion safety test results must be acted upon appropriately according to the Standard Work Specifications and BPI protocols.
<table>
<thead>
<tr>
<th>How do you address unsafe or non-functioning secondary heating systems, Including unvented secondary space heaters?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maintenance and repair of secondary heating units is allowed.</td>
</tr>
<tr>
<td>Minor maintenance activities can be performed for traditional open masonry fireplaces and wood burning stove/pellet stoves. This would be a health and safety issue requiring photo documentation and receipt of services by the professional with a description of what services were performed. Inspection, repair and or cleaning shall be sub-contracted to a qualified solid fuel heating system vendor.</td>
</tr>
<tr>
<td>An unsafe, unrepairable open masonry fireplace would be treated similarly to that of an unvented space heater if it is the primary source of heat. The fireplace must be rendered inoperable and replaced with a vented heating unit. The type of existing fuel will dictate the replacement. If the client has a combustion fuel source (e.g. - gas, propane, etc) then seal up the fireplace, and add a vented gas heater.</td>
</tr>
<tr>
<td>Testing will be required to assure adequate supply of electricity is available for existing standalone electric space heaters. This will be accomplished through the use of three wire circuit testers, GFI electrical outlet testers, and line voltage testers. Repair, replacement or installation is not allowed. Removal is recommended.</td>
</tr>
<tr>
<td>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.</td>
</tr>
<tr>
<td>Testing for air-free carbon monoxide (CO) is to be performed. All units must have an ANSI Z21.11.1 label, and meet IRC and IFGC codes. The client must be informed of the dangers of unvented space heaters – CO, Moisture, and NO2. CO can be dangerous even if CO alarm does not sound.</td>
</tr>
<tr>
<td>Assessors must calibrate the CO tester outside the home and test the ambient air in the home; following the standards in the Standard Works Specifications:</td>
</tr>
<tr>
<td>• Perform an inspection of the heater. Any of the following conditions are grounds for repair or replacement:</td>
</tr>
<tr>
<td>o Carbon monoxide (CO) test indicates ambient CO levels above 35 PPM</td>
</tr>
<tr>
<td>o Bad burners (missing, broken, or otherwise un-repair-able)</td>
</tr>
<tr>
<td>o Cross-fueled (between NG and LPG) and the orifices and/or pressure regulator have not been changed</td>
</tr>
<tr>
<td>o Missing radiants</td>
</tr>
<tr>
<td>o Open flame burners</td>
</tr>
<tr>
<td>o Rubber supply lines</td>
</tr>
<tr>
<td>o Charring or scorching</td>
</tr>
<tr>
<td>If the cause cannot be determined, Subgrantee must calibrate equipment and re-test. If still indeterminable, refer to local gas company. Any time replacement is deemed necessary, first consider performing the replacement as an ECM (energy saving measure) before replacing as a Health &amp; Safety measure.</td>
</tr>
</tbody>
</table>
Indicate Documentation Required for At-Risk Occupants

The application will be used to determine if a household includes Vulnerable Populations (also known as at-risk occupants). Vulnerable Populations are defined as Elderly (60 or older), Disabled or Children 5 and younger.

Testing Protocols

Make sure primary systems are present, operable, and performing correctly.
Check DOE-approved audit to determine if the system can be installed as an energy conservation measure (ECM) prior to replacement as an H&S measure.
Determine and document presence of Vulnerable Populations when installing air-conditioning as a Health and Safety (H&S) measure.
On combustion equipment, inspect chimney and flue and test for Combustion Appliance Zone (CAZ) depressurization.
For solid fuel appliances look for visual evidence of soot on the walls, mantel or ceiling or creosote staining near the flue pipe.

Client Education

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

Training

Licensing and/or certification for HVAC installers as required by authority having jurisdiction (AHJ).
CAZ depressurization test and inspection training.
Additional training will be handled on an ongoing and as-needed basis as identified by new requirements, new staff hires, results of monitoring reports, requests by Subgrantees etc.

7.2 - Asbestos - All

What is the blower door testing policy when suspected Asbestos Containing Material (ACM) is identified?

This is not allowed if vermiculite is present. Subgrantee will inspect pipe and other coverings for asbestos. Encapsulation is allowed by an AHERA asbestos control professional, and should be conducted prior to any blower door testing if the materials are friable.

7.2a – Asbestos - in siding, walls, ceilings, etc.

<table>
<thead>
<tr>
<th>Concurrence, Alternative, or Deferral</th>
</tr>
</thead>
<tbody>
<tr>
<td>Concurrence with Guidance ☑</td>
</tr>
<tr>
<td>Alternative Guidance ☐</td>
</tr>
<tr>
<td>Results in Deferral ☐</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Funding</th>
</tr>
</thead>
<tbody>
<tr>
<td>DOE ☐</td>
</tr>
<tr>
<td>LIHEAP ☐</td>
</tr>
<tr>
<td>State ☐</td>
</tr>
<tr>
<td>Utility ☐</td>
</tr>
<tr>
<td>Other ☐</td>
</tr>
</tbody>
</table>
How do you address suspected ACM’s in siding, walls, or ceilings that will be disturbed through the course of weatherization work?

Asbestos is the name given to a number of naturally occurring fibrous minerals with high tensile strength, the ability to be woven, and resistance to heat and most chemicals. Because of these properties, asbestos fibers have been used in a wide range of manufactured goods, including roofing shingles, ceiling and floor tiles, paper and cement products, textiles, coatings, and friction products such as automobile clutch, brake and transmission parts. It is difficult to tell whether a material contains asbestos simply by looking at it, unless it is labeled. If in doubt, treat the material as if it contains asbestos. Do not dust, sweep, or vacuum debris that may contain asbestos. Never saw, sand, scrape, or drill holes in asbestos materials.

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. It is recommended, where possible, to insulate through home interior to avoid disturbing or removing the asbestos siding on the exterior of the home.

Testing Protocols
Testing is allowed by a certified AHERA tester. Visual inspection of exterior wall surface and subsurface, floors, walls, and ceilings for suspected ACM is required prior to drilling or cutting.

Client Education
In every instance, clients shall be informed both verbally and in writing that suspected asbestos containing materials are present. Clients shall also be informed as to the precautions that will be taken. Client written materials shall include information about the potential health risks associated with asbestos.

Training and Certification Requirements
The OSHA Fact Sheet on Asbestos is available on the Department’s website under Health and Safety for all Subgrantees’ use: http://www.tdhca.state.tx.us/community-affairs/wap/guidance.htm On-going Health & Safety training will continue via regional training, Q&As, and postings of FAQs to Department Website. http://www.tdhca.state.tx.us/community-affairs/wap/guidance.htm. Additional training will be handled on an ongoing and as-needed basis as identified by new requirements, new staff hires, results of monitoring reports, requests by Subgrantees, etc. AHERA certification required for testing and allowable removal.

7.2b – Asbestos - in vermiculite
Concurrence, Alternative, or Deferral
Concurrence with Guidance ☑ Alternative Guidance ☐ Results in Deferral ☐

Funding
DOE ☑ LIHEAP ☐ State ☐ Utility ☐ Other ☐

How do you address suspected ACM’s in vermiculite that will be disturbed through the course of weatherization work?

When vermiculite is present, unless testing determines otherwise, take precautionary measures as if it contains asbestos, such as not using blower door tests and utilizing personal air monitoring while in attics. Where blower door tests are performed, it is a best practice to perform pressurization instead of depressurization. Encapsulation by an AHERA certified asbestos control professional shall be allowed. Removal shall not be allowed.

Testing Protocols
Testing is allowed by a certified AHERA tester.
Client Education

In every instance, clients shall be informed both verbally and in writing that suspected asbestos containing materials are present. Clients shall also be informed as to the precautions that will be taken. Client written materials shall include information about the potential health risks associated with asbestos.

Training and Certification Requirements

The OSHA Fact Sheet on Asbestos is available on the Department’s website under Health and Safety for all Subgrantees’ use: http://www.tdhca.state.tx.us/community-affairs/wap/guidance.htm

On-going Health & Safety training will continue via regional training, Q&As, and postings of FAQs to Department Website. http://www.tdhca.state.tx.us/community-affairs/wap/guidance.htm.

Additional training will be handled on an ongoing and as-needed basis as identified by new requirements, new staff hires, results of monitoring reports, requests by Subgrantees, etc.

AHERA certification required for testing and allowable removal.

<table>
<thead>
<tr>
<th>7.2c – Asbestos - on pipes, furnaces, other small covered surfaces</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Concurrence, Alternative, or Deferral</strong></td>
</tr>
<tr>
<td>Concurrence with Guidance ☑ Alternative Guidance ☐ Results in Deferral ☐</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Funding</th>
</tr>
</thead>
<tbody>
<tr>
<td>DOE ■ LIHEAP ☐ State ☐ Utility ☐ Other ☐</td>
</tr>
</tbody>
</table>

**How do you address suspected ACM’s (e.g., pipes, furnaces, other small surfaces) that will be disturbed through the course of weatherization work?**

Inspect pipes, furnaces, and other coverings for asbestos. Encapsulation is allowed by an AHERA asbestos control professional and should be conducted prior to any blower door testing. Removal may also be allowed by an AHERA asbestos control professional based on the situation as determined by the inspector or Agency Representative.

Testing Protocols

Testing is allowed by a certified AHERA tester.

Client Education

In every instance, clients shall be informed both verbally and in writing that suspected asbestos containing materials are present. Clients shall also be informed as to the precautions that will be taken. Client written materials shall include information about the potential health risks associated with asbestos.

Training and Certification Requirements

The OSHA Fact Sheet on Asbestos is available on the Department’s website under Health and Safety for all Subgrantees’ use: http://www.tdhca.state.tx.us/community-affairs/wap/guidance.htm

On-going Health & Safety training will continue via regional training, Q&As, and postings of FAQs to Department Website. http://www.tdhca.state.tx.us/community-affairs/wap/guidance.htm.

Additional training will be handled on an ongoing and as-needed basis as identified by new requirements, new staff hires, results of monitoring reports, requests by Subgrantees, etc.

AHERA certification required for testing and allowable removal.

<table>
<thead>
<tr>
<th>7.5 – BIOLOGICALS AND UNSANITARY CONDITIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>(ODORS, MUSTINESS, BACTERIA, VIRUSES, RAW SEWAGE, ROTTING WOOD, ETC.)</td>
</tr>
<tr>
<td><strong>Concurrence, Alternative, or Deferral</strong></td>
</tr>
<tr>
<td>Concurrence with Guidance ☑ Alternative Guidance ☐ Results in Deferral ☐</td>
</tr>
<tr>
<td>Unallowable Measure ☐</td>
</tr>
</tbody>
</table>
**Funding**

<table>
<thead>
<tr>
<th>DOE</th>
<th>LIHEAP</th>
<th>State</th>
<th>Utility</th>
<th>Other</th>
</tr>
</thead>
</table>

**What guidance do you provide Subgrantees for dealing with biological and/or unsanitary conditions in homes slated for weatherization?**

Remediation of conditions that may lead to or promote biological concerns and unsanitary conditions is allowed. Addressing bacteria and viruses is not an allowable cost. Deferral may be necessary in cases where a known agent is present in the home that may create a serious risk to occupants or weatherization workers.

The use of personal protective equipment shall be strictly enforced. Respirators, protective eyewear, and protective clothing will be worn when there is suspicion or knowledge that biological agents may be present in order to eliminate or minimize crew exposure.

In the past, remediation of conditions listed under this health and safety category was not allowed. It is allowable under WPN 17-7, except for the removal of known bacteria and viruses. Texas will assess the cost effectiveness and necessity of remediation of conditions that lead to or promote biological concerns and unsanitary conditions, on a case by case basis.

**Testing Protocols**

A sensory inspection is required.

**Client Education**

Client must be informed of observed conditions. Clients must be provided information and explanation on how to maintain a sanitary home and steps to correct deferral conditions, if applicable.

**Training**

On-going Health & Safety training will continue via regional training, Q&As, and postings of FAQs to Department Website. [http://www.tdhca.state.tx.us/community-affairs/wap/guidance.htm](http://www.tdhca.state.tx.us/community-affairs/wap/guidance.htm).

Additional training specific to identifying structural and roofing issues will be handled on an ongoing and as-needed basis as identified by new requirements, new staff hires, results of monitoring reports, requests by Subgrantees, etc.

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**7.6 – BUILDING STRUCTURE AND ROOFING**

**Concurrence, Alternative, or Deferral**

<table>
<thead>
<tr>
<th>Concurrence with Guidance</th>
<th>Alternative Guidance</th>
<th>Results in Deferral</th>
</tr>
</thead>
</table>

**Funding**

<table>
<thead>
<tr>
<th>DOE</th>
<th>LIHEAP</th>
<th>State</th>
<th>Utility</th>
<th>Other</th>
</tr>
</thead>
</table>
What guidance do you provide Subgrantees for dealing with structural issues (e.g., roofing, wall, foundation) in homes slated for weatherization?

Building rehabilitation is beyond the scope of the WAP. Homes with conditions that require more than incidental repair should be deferred.

While conducting the initial audit, the building structure shall be inspected for structural integrity. Minor repairs to protect the DOE materials installed may be performed to protect the energy saving investment. Dwellings whose structural integrity is in question should be referred to agencies that deliver HUD funds or other appropriate local and state agencies. Weatherization services may need to be delayed or deferred until the dwelling can be made safe for crews/contractors and occupants. Incidental (minor) repairs necessary to effectively perform or preserve weatherization materials/measures are allowed. Examples of these include sealing minor roof leaks to preserve new attic insulation and repairing water-damaged flooring as part of replacing a water heater. Incidental structural repairs shall not include cosmetic applications, such as replacing a floor covering such as a carpet or linoleum. Only the structural part shall be replaced/repaired.

How do you define “minor” or allowable structure and roofing repairs, and at what point are repairs considered beyond the scope of weatherization?

Minor repairs would be repairs that are necessary for weatherization work to proceed, but that can be justified in the whole house SIR by the site-specific audit. Repairs would be beyond the scope of weatherization when causing the whole house SIR to drop below one.

If priority lists are used, and these repairs are designated as Incidental Repairs, at what point is a site-specific audit required?

N/A – Priority List is not used.

Client Education

Clients shall be notified verbally and in writing regarding any structurally compromised areas. Appropriate referral resources shall also be provided to the client.

Training

On-going Health & Safety training will continue via regional training, Q&As, and postings of FAQs to Department Website. [http://www.tdhca.state.tx.us/community-affairs/wap/guidance.htm](http://www.tdhca.state.tx.us/community-affairs/wap/guidance.htm). Additional training specific to identifying structural and roofing issues will be handled on an ongoing and as-needed basis as identified by new requirements, new staff hires, results of monitoring reports, requests by Subgrantees etc.

### 7.7 – CODE COMPLIANCE

**Concurrence, Alternative, or Deferral**

- Concurrence with Guidance [x]
- Alternative Guidance [ ]
- Results in Deferral [ ]

**Funding**

- DOE [ ]
- LIHEAP [ ]
- State [ ]
- Utility [ ]
- Other [ ]
What guidance do you provide Subgrantees for dealing with code compliance issues in homes receiving weatherization measures?

Correction of pre-existing code compliance issues is not an allowable cost other than where weatherization measures are being conducted. When correction of preexisting code compliance issues is triggered and paid for with WAP funds, Subgrantee must cite specific code requirements with reference to the weatherization measure(s) that triggered the code compliance issue in the client file.

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.

WAP funds may be used when weatherization measures are being conducted. They may not be used simply to correct pre-existing code compliance issues.

Acquire all required permits and licenses pertinent to installing weatherization measures. These vary by jurisdiction and it is the responsibility of each Subgrantee agency to know what the codes are in each of the areas they work, as well as what permits and licenses are required in each of the areas they work.

What specific situations commonly trigger code compliance work requirements for your network? How are they addressed?

Condemned properties shall be deferred. Properties where “red-tagged” health and safety conditions exist, structural instability or damage (roof), electrical wiring type, condition or provisioning deficiencies, sewage drainage deficiencies that cannot be addressed with DOE H&S funding, should be deferred.

Client Education
Inform client of observed code compliance issues. Make appropriate referrals as necessary.

Training
The Department is working with the State Energy Conservation Office (DOE State Energy Program Subgrantee and is the State Authority to adopt code) on a collaborative effort to address code compliance issues. The group will address code education throughout the state of Texas. Classes will be available to all Subgrantees to attend at a nominal fee set by the group to cover costs.

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Testing Protocols

IRC 2015

D.2 Occupant and Inspector Safety. Prior to entering a building, the inspector should have both a combustible gas detector (CGD) and CO detector turned on, calibrated, and operating. Immediately upon entering the building, a sample of the ambient atmosphere should be taken.

A complete mechanical systems assessment is required to be completed on every home. The procedure includes collecting general information; collecting and recording mechanical systems information; visual and diagnostic inspection of the venting and distribution system; and, combustion analysis and diagnostic testing of gas/propane fired equipment, and post-installation safety tests for CO. Combustion safety testing is required when combustion appliances are present. Pre and post combustion appliance safety inspections include all of the following: carbon monoxide testing, draft measurement, spillage evaluation, and worst case depressurization of the combustion appliance zone (CAZ).

As applicable, every combustion appliance will be checked for a safe flue pipe, chimney or vent, adequate combustion air, and gas leakage. DOE will not permit any DOE-funded weatherization work where the dwelling unit is heated with an unvented gas- and/or liquid-fueled space heater as the primary heat source. In such cases the primary space heater must be removed and a vented code compliant heat source must be installed prior to the installation of weatherization measures. DOE will allow unvented gas- or liquid-fueled space heaters to remain as secondary heat sources provided they comply with ANSI Z21.11.2, the IRC, and the IFGC. LIHEAP-WAP may replace non-compliant secondary unvented gas- or liquid-fueled space heaters.

Client shall be provided with combustion safety and hazards information, including the importance of using exhaust ventilation when cooking and keeping burners clean to limit the production of CO.

Best Practice:

- Combustion Appliance Zone (CAZ) Testing
- Isolating the Combustion Appliance Zone (CAZ)

How are crews instructed to handle problems discovered during testing, and what are the specific protocols for addressing hazards that require an immediate response?

Proper venting to the outside for combustion appliances, including gas dryers, is required. Correction of venting is allowed when testing indicates a problem.

Based on CGD and CO detector readings, the inspector should take the following actions:

1. The CO detector indicates a carbon monoxide level of 70 ppm or greater. The inspector should immediately notify the occupant of the need for themselves and any building occupant to evacuate; the inspector shall immediately evacuate and call 911.
2. Where the CO detector indicates a reading between 30 ppm and 70 ppm. The inspector should advise the occupant that high CO levels have been found and recommend that all possible sources of CO should be turned off immediately and windows and doors opened. Where it appears that the source of CO is a permanently installed appliance, advise the occupant to keep the appliance off and have the appliance serviced by a qualified servicing agent.
3. Where CO detector indicates CO below 30 ppm the inspection can continue.

Client Education

Client shall be provided with combustion safety and hazards information, including the importance of using exhaust ventilation when cooking and the importance of keeping burners clean to limit the production of CO.
### Training

On-going Health & Safety training will continue via regional training, Q&As, and postings of FAQs to Department Website. [http://www.tdhca.state.tx.us/community-affairs/wap/guidance.htm](http://www.tdhca.state.tx.us/community-affairs/wap/guidance.htm).

Additional training will be handled on an ongoing and as-needed basis as identified by new requirements, new staff hires, results of monitoring reports, requests by Subgrantees etc.

### 7.9 – ELECTRICAL

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**Funding**

| DOE □ | LIHEAP ◐ | State □ | Utility □ | Other □ |

**What guidance do you provide Subgrantees for dealing with electrical hazards, including knob & tube wiring, in homes slated for weatherization?**

Minor electrical repairs are allowed where health or safety of the occupant(s) may be at risk. Upgrades and repairs are allowed when necessary to perform specific weatherization measures.

Aluminum wiring should be thoroughly inspected before any insulation work is done. If aluminum wiring is found to be active and in the areas to be insulated, no insulation should be added. When electrical repairs within the scope of the DOE WAP are required, the typical standard of remedy shall be to subcontract the repair work to a licensed electrician. All appropriate procurement procedures shall be followed when subcontracting. Testing shall include visual inspection, as well as voltage drop and voltage detection testing. Provide client information on overloading circuits and electrical safety and risks.

**How do you define “minor” or allowable electrical repairs, and at what point are repairs considered beyond the scope of weatherization?**

Minor upgrades and repairs necessary for weatherization measures and where the health or safety of the occupant(s) is at risk may be allowed. Examples of minor repairs include exposed electrical connections, damaged or nonworking switches and receptacles, and damaged or unsafe electrical wire conditions.

Prior to insulating around Knob and Tube wiring, cost effectiveness must be evaluated and barriers must be installed to keep insulation at least three inches from the K&T. If K&T is permanently disabled (cannot be energized again) then it may be insulated over.

Best Practice:

- **Knob & Tube Wiring**

**If priority lists are used, and these repairs are designated as Incidental Repairs, at what point is a site-specific audit required?**

N/A – Priority List is not used.

**Client Education**

Provide information on overloading circuits and electrical safety and risks.
On-going Health & Safety training will continue via regional training, Q&As, and postings of FAQs to Department Website. http://www.tdhca.state.tx.us/community-affairs/wap/guidance.htm. Additional training for how to identify electrical hazards and code compliance will be handled on an ongoing and as-needed basis as identified by new requirements, new staff hires, results of monitoring reports, requests by Subgrantees etc.

### 7.10 – FORMALDEHYDE, VOLATILE ORGANIC COMPOUNDS (VOCs), FLAMMABLE LIQUIDS, AND OTHER AIR POLLUTANTS

**Concurrence, Alternative, or Deferral**

| Concurrence with Guidance ☑ | Alternative Guidance ☐ | Results in Deferral ☐ |

**Funding**

| DOE ☑ | LIHEAP ☐ | State ☐ | Utility ☐ | Other ☐ |

**What guidance do you provide Subgrantees for dealing with formaldehyde, VOCs, flammable liquids, and other air pollutants identified in homes slated for weatherization?**

WAP workers may not remove pollutants. Removal of pollutants must be done by the client or a contracted professional prior to weatherization work being performed. If pollutants pose a risk to workers and removal cannot be performed by a professional or the client refuses to remove the pollutants, the unit must be deferred.

Visual, sensory, combustion appliances inspection/testing and completion of Client Questionnaire and Inspection Checklist shall be the primary detection method. All reasonable steps shall be taken to limit worker exposure to VOCs, air pollutants and biological contaminants utilizing OSHA PPE guidelines. Many VOCs are human-made chemicals that are used and produced in the manufacture of paints, paint thinner, petroleum fuels, sealants, and refrigerants. When using products known to emit VOCs, increase ventilation is required. Meet or exceed any label precautions. Identify, and if possible, have client or a contracted professional remove the source. Biological contaminants include bacteria, molds, mildew, viruses, animal dander and cat saliva, house dust, mites, cockroaches, and pollen. Identification of these contaminants can indicate elevated relative humidity level in a home and improper ventilation which would need to be addressed. State and local codes and regulations regarding disposal of toxic household wastes must be followed. Texas WAP crews/contractors shall take every precaution necessary to minimize exposure to air pollutants.

When using chemicals and products that may contain any of the pollutants within this category, strict adherence to label instructions and precautions shall be required. Known pollutants must be removed by the client or a contracted professional prior to performance of weatherization work.

**Health and Safety Guidance**

- [EPA Guidance on Common Household Wastes & Materials](#)
- [Indoor Air Quality](#)

**Testing Protocols**

Sensory inspection shall be the primary detection method.
Client Education

Clients must be informed of any conditions and/or associated risks observed. Client must be given written information on safety and proper disposal of household pollutants, if applicable.

Training

Guidance on how to recognize potential hazards and when removal is necessary is posted to the Department Website: http://www.tdhca.state.tx.us/community-affairs/wap/guidance.htm

On-going Health & Safety training will continue via regional training, Q&As, and postings of FAQs to Department Website. http://www.tdhca.state.tx.us/community-affairs/wap/guidance.htm

Additional training will be handled on an ongoing and as-needed basis as identified by new requirements, new staff hires, results of monitoring reports, requests by Subgrantees, etc.

7.11 – Fuel Leaks

(Please indicate specific fuel type if policy differs by type)

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Remediation Protocols

Natural gas and LP gas piping system inspection and leakage testing will be conducted. An inspection of the accessible gas piping and connections, from the natural gas meter or LP gas tank to a point where the supply line connects to the gas valve of all appliances shall be completed.

When a minor gas leak is found on the utility side of service, the utility service must be contacted before work may proceed.

Where the auditor confirms gas leakage or identifies deficiencies in gas piping materials, connections, components, or supports, the deficiencies shall be marked and noted in project documentation. The homeowner/occupant shall be notified that repairs must be made. The auditor shall recommend that the homeowner/occupant immediately notify the gas company and/or a qualified professional to evaluate and perform all necessary repairs. Notify utilities and temporarily halt work when leaks are discovered that are the responsibility of the utility to address.

How do you define allowable fuel leak repairs, and at what point are repairs considered beyond the scope of weatherization?

Allowable repairs/replacement includes but is not limited to:
- Worn and/or leaking flexible gas lines and any flexible connectors manufactured prior to 1973;
- Worn or damaged gas valves; and
- Appliance gas valve/regulator housing and connections.

Client Education

Inform clients in writing if fuel leaks are detected.

Training

Fuel leak testing.
### 7.12 – Gas Ovens / Stovetops / Ranges

#### Concurrence, Alternative, or Deferral

- **Concurrence with Guidance**: ✔
- **Alternative Guidance**: □
- **Results in Deferral**: □

#### Funding

- **DOE**: □
- **LIHEAP**: □
- **State**: □
- **Utility**: □
- **Other**: □

**What guidance do you provide Subgrantees for addressing unsafe gas ovens/stoves/ranges in homes slated for weatherization?**

Replacement of cook stoves may be done with unrestricted funds from a funding source other than DOE. Repair and cleaning are allowed.

**Cook Stoves with high CO:**

- Clean or repair.
- If it still has high CO levels, then see if another funding source is able to pay for the stove replacement.
- If no other source, the house must be deferred until the occupant can address the stove.
- Houses with stoves with CO levels of 150 ppm or higher which cannot be remedied must be deferred. The money spent trying to fix it, unsuccessfully, would be charged to Program Support.

The Department has defined maximum acceptable CO readings of stoves as follows:

1. 25 parts per million for cook stove burners.
2. 150 parts per million for cook stove ovens.

#### Testing Protocols

- Test gas ovens and burners for CO.
- Inspect cooking burners and ovens for operability and flame quality.

#### Client Education

- Inform clients of the importance of using exhaust ventilation when cooking and the importance of keeping burners clean to limit the production of CO.

#### Training

- Testing techniques
- CO action levels

### 7.13 – Hazardous Materials Disposal

[Lead, Refrigerant, Asbestos, Mercury (Including CFLs/Fluorescents), etc.]

(Please indicate material where policy differs by material)

#### Concurrence, Alternative, or Deferral

- **Concurrence with Guidance**: ✔
- **Alternative Guidance**: □
- **Results in Deferral**: □

#### Funding

- **DOE**: □
- **LIHEAP**: □
- **State**: □
- **Utility**: □
- **Other**: □
Client Education
Inform client in writing of hazards associated with hazardous waste materials being generated/handled in the home.

Training
Appropriate Personal Protective Equipment (PPE) for working with hazardous waste materials.
Disposal requirements and locations.
Health and environmental risks related to hazardous materials.

Disposal Procedures and Documentation Requirements
Refrigerants shall be pumped into a recovery tank and disposed at an EPA approved site.
Proper disposal procedures for Asbestos are available at Texas Commission on Environmental Quality (TCEQ):

Special Waste Disposal:
http://www.tceq.texas.gov/permitting/waste_permits/msw_permits/msw_specialwaste.html

Texas WAP crews/contractors will follow all EPA RRP requirements for disposal of lead as well as state and local code requirements.

Disposal procedures for mercury will follow TCEQ guidance available here:

7.14 – INJURY PREVENTION OF OCCUPANTS AND WEATHERIZATION WORKERS (MEASURES SUCH AS REPAIRING STAIRS AND REPLACING HANDRAILS)

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What guidance do you provide Subgrantees regarding allowable injury-related repairs (e.g., stairs, handrails, porch deck board)?
Workers must take all reasonable precautions against performing work on homes that will subject workers or occupants to health and safety risks. Porch or stair repairs that would be required to make a home safe for weatherization workers are not an allowable measure in the program. Such situations are considered to be beyond the scope of Texas WAP.

How do you define “minor” or allowable injury prevention measures, and at what point are repairs considered beyond the scope of weatherization? Quantify “minor” or allowable injury prevention measures.
Minor injury prevention measures can include minor electrical repairs as described in section 7.9. Proper safety protocols should be followed to reduce risk of injury as described in sections 7.20 and 7.23. Any other injury prevention measure would be considered beyond the scope of WAP and shall result in unit deferral.

Training
OSHA 10 for crew members and OSHA 30 for supervisors.
**7.15 – LEAD BASED PAINT**

**Concurrence, Alternative, or Deferral**

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**Safe Work Protocols**

Weatherization requires all weatherization crews/contractors working in pre-1978 housing to be trained in Lead Safe Weatherization (LSW) and follow EPA’s Lead; Renovation, Repair and Painting Program (RRP) rule. Deferral is required when the extent and condition of lead-based paint in the house would potentially create further health and safety hazards.

In all pre-1978 homes, crews/contractors must assess the physical condition of the home prior to conducting an audit. Texas recommends assuming that lead paint may be present in any house built prior to 1978 and to follow the proper DOE LSW protocols, OSHA regulations and EPA regulations in all pre-1978 homes. Mobile homes are exempt because lead was not used in the original manufacture of mobile homes. However, crews/contractors must be alert to any mobile home remodels/add-ons that could have contained lead-based paint or varnish.

Texas WAP crews/contractors will follow all EPA RRP requirements for disposal as well as state and local code requirements.

Deferral is required when the extent and condition of lead-based paint in the house would potentially create further H&S hazards.

Only those costs directly associated with the testing and lead safe practices for surfaces directly disturbed during weatherization activities are allowable.

State policy mandates all workers on site on any weatherization project, whether they be a crew based employee of one of the sub-contractors or a private sector contractor, must complete an eight (8) hour Lead Safe Worker Practices Workshop.

**Best Practice:**
- Lead-safe Process and RRP Requirement

**WX Videos**
- 12 Steps to Lead Safety
- Health & Safety Series: Respirators & Personal Protective Equipment

**Health and Safety Guidance**
- Lead; Renovation, Repair, and Painting Program; Lead Hazard Information
- Renovate Right
Testing Protocols
Testing is allowed per RRP requirements. Job site set up and cleaning verification is required by a Certified Renovator. Texas WAP crews/contractors will use LSW work practices that decrease the amount of dust generated.

Client Education
All Subgrantees are required to provide a copy of “Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools” to an adult occupant prior to work starting on the home. This procedure is documented by a written acknowledgement that the adult occupant has received the brochure and that the information was not only distributed, but also explained, or certify in writing that a brochure had been delivered to an adult occupant and the provider has been unsuccessful in obtaining a written acknowledgement, as directed in the publication. Confirmation of receipt of this brochure by the client will be maintained in the client file.

Training and Certification Requirements
Each Subgrantee must be an EPA Certified Firm and have a Certified Lead Renovator on staff. The Subgrantee is responsible to obtain and maintain the required certifications.

Documentation Requirements
Documentation in the client file must include Certified Renovator certification; any training provided on-site; description of specific actions taken; lead testing and assessment documentation; and, photos of site and containment set up. Include the location of photos referenced if not in file.

7.16 – MOLD AND MOISTURE
(INCLUDING BUT NOT LIMITED TO: DRAINAGE, GUTTERS, DOWN SPOUTS, EXTENSIONS, FLASHING, SUMP PUMPS, DEHUMIDIFIERS, LANDSCAPE, VAPOR RETARDERS, MOISTURE BARRIERS, ETC.)

Concurrence, Alternative, or Deferral
Concurrence with Guidance ☑ Alternative Guidance ☐ Results in Deferral ☐

Funding
DOE ■ LIHEAP ☐ State ☐ Utility ☐ Other ☐
What guidance do you provide Subgrantees for dealing with moisture related issues (e.g., drainage, gutters, down spouts, moisture barriers, dehumidifiers, vapor barrier on bare earth floors) in homes slated for weatherization?

Limited water damage repairs can be addressed by weatherization workers. Correction of moisture and mold creating conditions are allowed when necessary in order to weatherize the home and to ensure the long term stability and durability of the measures. Where severe mold-like substance and moisture issues cannot be addressed, deferral is required.

Visual assessment is required and diagnostics such as moisture meters are recommended pre-assessment and prior to final inspection. The assessment shall assure existing mold-like conditions are noted, documented and disclosed to the client; and, shall assure existing building envelope conditions do not contribute to mold-like growth when weatherization measures are applied. Mold-like substance assessment means a visual assessment combined with certain allowable diagnostics. It does not mean testing for mold. **DOE funds may not be used to test for mold-like substances.**

Texas WAP crews/contractors shall follow the Mold/Moisture Assessment Checklist when conducting the mold-like substances assessment at the time of the audit. Assessment shall include a general examination of the building, to include:
• Examine structure, maintenance activities, occupancy patterns
• Visually look for mold-like substances and water staining
• Look for evidence of standing water
• Look for evidence of condensation
• Check basement or crawl space and attic for proper venting and exhaust

Outdoors:
• Soil grade or drainage toward foundation
• Standing water adjacent to foundation
• Wall and roof damage allowing water intrusion
• Missing or blocked rain gutters
• No downspout extensions
• Firewood stacked adjacent to house
• Excessive shrubbery around foundation

Heating/cooling systems:
• Air intakes: debris (organic) vs. clean air
• Filters: dirty, damp, poor type
• Heat exchangers: dirty & damp coils, condensate pans, drainage, stagnant water
• Ducts: contamination, moisture

Occupied Space:
• Plumbing leaks
• Water stains on walls, ceilings and around windows
• Musty odor
• Surface Condensation (especially during mild weather)
• Mold-like substances on carpeting
• Humidifiers
• Window air conditioners
• Lack of bathroom, kitchen exhaust
• Clothes dryer not vented to outside
• Firewood stored indoors
• Wet clothes drying indoors

The DOE Training Resource:
• Mold and Moisture given by Michael Vogel of MSU Weatherization Training Center is available to all Subgrantees through TDHCA’s website
• Energy Related Mold and Moisture...awareness and impacts for weatherization

Best Practice:
• Mold-safe Process

How do you define “minor” or allowable moisture-related measures, and at what point is work considered beyond the scope of weatherization?
Client Education
Provide client notification and disclaimer on mold-like substances and moisture awareness. The unified weatherization form that identifies if there are mold-like substances, must be included in the client files, regardless of whether there is mold-like substance in the home or not. A Mold -Like Substance Notification and Release Form for Texas Weatherization Programs must be filled out if mold or mold-like substances are found in the home. Texas Department of State Health Services, Consumer Mold Information Sheet is required to be given to clients who have moisture problems or mold-like substances, as part of client education.

Training
The DOE power-point presentation training on Mold and Moisture given by Michael Vogel of MSU Weatherization Training Center is available to all Subgrantees through TDHCA’s website: http://www.tdhca.state.tx.us/community-affairs/wap/wap-training-videos.htm.
Additional training will be handled on an ongoing and as-needed basis as identified by new requirements, new staff hires, results of monitoring reports, requests by Subgrantees etc.

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Funding
DOE ☒  LIHEAP ☐  State ☐  Utility ☐  Other ☐

What guidance do you provide Subgrantees for dealing with pests and pest intrusion prevention in homes slated for weatherization?

Pest removal is allowed only where infestation would prevent weatherization or poses a health and safety concern for workers. Infestation of pests may be cause for deferral where it cannot be reasonably removed.

Determine whether the pest infestation would prevent or hamper the weatherization work. If removal is a viable and cost-effective option, take the necessary steps to remove the pest infestation problem so that the weatherization work can proceed. If removal is not a viable and cost-effective option or significant health and safety risks exist, defer the weatherization work and provide client with appropriate referral information.

Best Practice:
- Pests

Define Pest Infestation Thresholds, Beyond Which Weatherization Is Deferred
Costs beyond $50 in labor and materials to mitigate pest infestations will be addressed by TDHCA to determine if deferral is necessary.

Testing Protocols
Assessment of presence and degree of infestation and risk to worker.

Client Education
Inform client of observed pest condition and associated risks and document in client file.

Training
How to assess presence and degree of infestation, associated risks, and deferral policy.
Additional training will be handled on an ongoing and as-needed basis as identified by new requirements, new staff hires, results of monitoring reports, requests by Subgrantees etc.
7.18 – RADON

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☑ Alternative Guidance ☐ Results in Deferral ☐

Funding

DOE ■ LIHEAP ☐ State ☐ Utility ☐ Other ☐

What guidance do you provide Subgrantees around radon?

TDHCA will provide Subgrantees with a Radon Informed Consent Form and the EPA’s A Citizen’s Guide to Radon.

State specific resources can be found at: [https://www.epa.gov/radon/find-information-about-local-radon-zones-and-state-contact-information#stateradon](https://www.epa.gov/radon/find-information-about-local-radon-zones-and-state-contact-information#stateradon)

The Texas Department of State Health Services website also contains useful information:

- [Radon](https://www.epa.gov/radon/radon)

Testing Protocols

Testing in not authorized in Texas WAP as Texas has no areas of "Highest Potential," according to the United States Environmental Protection Agency standards.

Client Education


Training and Certification Requirements

Training will be provided regarding updated requirements per WPN 17-7 including use of the informed consent form.

Documentation Requirements

Client signed informed consent form.

7.19 – SAFETY DEVICES: SMOKE AND CARBON MONOXIDE ALARMS, FIRE EXTINGUISHERS

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☑ Alternative Guidance ☐ Results in Deferral ☐

Funding

DOE ■ LIHEAP ☐ State ☐ Utility ☐ Other ☐
### What is your policy for installation or replacement of the following:

**Smoke Alarms:**
Smoke alarms may be installed where alarms are not present or are inoperable.

At minimum, all Dwelling Units should have at least one smoke alarm on each level, including one near the combustion zone and at least one near the bedrooms. Ceiling-mounted smoke alarms must be mounted at least 6 inches from any wall. Wall-mounted smoke alarms must be installed at least 6 but less than 18 inches from the ceilings. They should always be installed according to applicable local codes or ordinances.

Smoke Alarms shall be installed per IRC. R314.3 Location. Smoke alarms shall be installed in the following locations:

1. In each sleeping room.
2. Outside each separate sleeping area in the immediate vicinity of the sleeping room.
3. On each additional story of the dwelling, including basements and habitable attics and not including crawl spaces and uninhabitable attics. In Dwelling Units with split levels and without an intervening door between the adjacent levels, a smoke alarm installed on the upper level shall suffice for the adjacent lower level provided that the lower level is less than one full story below the upper level.
4. Smoke alarms shall be installed not less than 3 feet (914 mm) horizontally from the door or opening of a bathroom that contains a bathtub or shower unless this would prevent placement of a smoke alarm required by Section R314.3.
Carbon Monoxide Alarms:

Per ASHRAE 62.2, at least one CO alarm must be present in every home. CO alarms must be installed in all homes with combustion appliances; combustion appliances include: cook stoves, furnaces, water heaters, wood and coal burning stoves. Combustion appliances must be installed to the IRC or local code regulations.

CO alarms must be installed where alarms are not present or are inoperable.

A CO alarm should also be installed in accordance with SWS. CO alarms should be installed in all homes with unvented space heaters (all unvented space heaters must comply with ANSI Z21.11.2) and in all homes where backdrafting could occur in a furnace, space heater, wood stove, fireplace, or water heater. Always install CO alarms according to the manufacturer’s instructions.

Don’t install CO alarms in these cases:
- In a room that may get too hot or cold for alarm to function properly;
- Within 5 feet of a combustion appliance, vent, or chimney;
- Within 5 feet of a storage area for vapor-producing chemicals;
- Within 12 inches of exterior doors and windows;
- Within a furnace closet or room;
- With an electrical connection to a switched circuit; or
- With a connection to a ground-fault circuit interrupter (GFCI).

R315.3 Location. Carbon monoxide alarms in Dwelling Units shall be installed outside, in the immediate vicinity, of each separate sleeping area. Where a fuel-burning appliance is located within a bedroom or its attached bathroom, a carbon monoxide alarm shall be installed within the bedroom. R315.6.1

General. Household carbon monoxide detection systems shall comply with NFPA 720. Carbon monoxide detectors shall be listed in accordance with UL 2075.

R315.6.4 Combination detectors. Combination carbon monoxide and smoke detectors shall be permitted to be installed in carbon monoxide detection systems in lieu of carbon monoxide detectors, provided that they are listed in accordance with UL 2075 and UL 268.

Fire Extinguishers: A fire extinguisher may be provided in homes with solid fuel burning equipment. The fire extinguisher must be installed according to the manufacturer’s standards and local code in the vicinity of the primary heating source.

Testing Protocols

Check existing alarms for operation.
Verify operation of installed alarms.

Client Education

The client will be provided with the manufacturer’s information sheet on use of smoke/CO detectors.

Training

Location and code requirements for installation of alarms.
### 7.20 – OCCUPANT HEALTH AND SAFETY CONCERNS AND CONDITIONS

<table>
<thead>
<tr>
<th>Concurrence, Alternative, or Deferral</th>
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<tbody>
<tr>
<td>Concurrence with Guidance ✔</td>
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<tr>
<td>Alternative Guidance ☐</td>
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<tr>
<td>Results in Deferral ☐</td>
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#### Funding

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<tr>
<th>DOE □</th>
<th>LIHEAP ☐</th>
<th>State ☐</th>
<th>Utility ☐</th>
<th>Other ☐</th>
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</table>

**What guidance do you provide Subgrantees for soliciting the occupants’ health and safety concerns related to components of their homes?**

A Health & Safety Questionnaire/ Checklist for use by Subgrantees can be found under Client and Field Assessment Forms on the Department Website: [http://www.tdhca.state.tx.us/communityaffairs/wap/guidance.htm](http://www.tdhca.state.tx.us/communityaffairs/wap/guidance.htm)

**What guidance do you provide Subgrantees for determining whether occupants suffer from health conditions that may be negatively affected by the act of weatherizing their home?**

Subgrantee must discuss results of survey with clients and potential measures list to determine if any measures could have an effect on the client’s health.

**What guidance do you provide Subgrantees for dealing with potential health concerns when they are identified?**

When a person’s health may be at risk and/or the work activities could create an H&S hazard the at-risk occupant will be required to take appropriate action based on the severity of the risk.

Temporary relocation of Vulnerable Populations may be allowed. Failure or inability to take appropriate actions will result in a deferral.

#### Client Education

Provide client information of any known risks. Provide worker contact information so client can inform of any issues.

Documentation Form(s) have been developed and comply with guidance? Yes ✔ No ☐

### 7.21 – VENTILATION AND INDOOR AIR QUALITY

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<th>Concurrence, Alternative, or Deferral</th>
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<tr>
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**Identify the Most Recent Version of ASHRAE 62.2 Implemented (optional: identify Addenda used)**

Texas WAP has adopted the ASHRAE 62.2 2016 standard.

**Testing and Final Verification Protocols**

Required measurements, including fan flow of existing fans installed equipment, will be captured on the TDHCA provided [Blower Door and Duct Blower Data Sheet (XLS)](http://www.tdhca.state.tx.us/communityaffairs/wap/guidance.htm). Pre and post measurements must be calculated using the [ASHRAE 62.2-2016 Calculator](http://www.tdhca.state.tx.us/communityaffairs/wap/guidance.htm) or other certified software.
### Client Education

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

### Training

Training for use of the new ASHRAE 62.2-2016 Calculator is available on the RedCalc website and TDHCA provides training on the difference between the 2013 and 2016 standard on an as needed basis.

### Tools and Guides:
- [Exhaust Fan Flow Meter Quick Guide (PDF)](/)
- [Single-Family Homes: Standard Work Specifications Field Guide (PDF)](/)

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#### 7.22 – WINDOW AND DOOR REPLACEMENT, WINDOW GUARDS

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<td>DOE ☒</td>
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</table>

What guidance do you provide to Subgrantees regarding window and door replacement and window guards?

Replacement, repair, or installation is not an allowable health and safety cost but may be allowed as an efficiency measure if cost justified.

When working on windows follow LSW requirements for pre-1978 homes.

### Testing Protocols

Not applicable

### Client Education

Provide written information on lead risks wherever issues are identified.

### Training

Guidance is provided through two best practices:
- Window Repair or Replacement
- Door Repair or Replacement

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#### 7.23 – WORKER SAFETY (OSHA, ETC.)

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<tr>
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</table>
How do you verify safe work practices? What is your policy for in-progress monitoring?

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

As part of the safety for crew, assessors will identify health and safety hazards according the OSHA method “Focus Four” which includes, electrical, fall protection, caught in and between, and struck-by hazards. The client will be informed in writing of any hazards and the associated risks that may have been observed.

Health and Safety Guidance

OSHA Focus Four

<table>
<thead>
<tr>
<th>Training and Certification Requirements</th>
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</thead>
<tbody>
<tr>
<td>OSHA 10-hour training for all crew level WAP employees</td>
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<tr>
<td>OSHA 30-hour training for all crew leaders</td>
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<tr>
<td>All OSHA training shall be updated as required and kept current.</td>
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<tr>
<td>SDS must be present at the work sites.</td>
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<table>
<thead>
<tr>
<th>7.24 – WATER HEATERS</th>
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<tbody>
<tr>
<td><strong>Concurrence, Alternative, or Deferral</strong></td>
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<tr>
<td>Concurrence with Guidance ☐ Alternative Guidance ☑ Results in Deferral ☐</td>
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<tr>
<td><strong>Funding</strong></td>
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<tr>
<td>DOE ■ LIHEAP ☐ State ☐ Utility ☐ Other ☐</td>
</tr>
<tr>
<td><strong>Remediation Protocols</strong></td>
</tr>
<tr>
<td>Replacement or repair of water heaters is allowed on a case by case basis. The Subgrantee must initially attempt to qualify existing Water Heater as an ECM. If the Water Heater does not rank, the Subgrantee may repair or replace the existing unit as a Health and Safety Measure. Further detailed in the Water Heater Replacement Best Practice on the TDHCA Website: <a href="http://www.tdhca.state.tx.us/community-affairs/wap/docs/WAP-BP-WaterHeaterRepairorReplace.pdf">http://www.tdhca.state.tx.us/community-affairs/wap/docs/WAP-BP-WaterHeaterRepairorReplace.pdf</a></td>
</tr>
<tr>
<td><strong>Testing Protocols</strong></td>
</tr>
<tr>
<td>Appropriate combustion appliance testing and water temperature testing.</td>
</tr>
<tr>
<td><strong>Client Education</strong></td>
</tr>
<tr>
<td>Clients shall be given all manufacturers information on the appropriate use and maintenance of water heating units.</td>
</tr>
<tr>
<td><strong>Training</strong></td>
</tr>
<tr>
<td>Combustion Appliance Zone (CAZ) training and identifying potential hazards associated with water heaters.</td>
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### PY2019 Monitoring Schedule*

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<tr>
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<tbody>
<tr>
<td>Big Bend Community Action Committee, Inc.</td>
<td>Hill Country Community Action Association, Inc.</td>
<td>Rolling Plains Management Corporation</td>
<td>Alamo Area Council of Governments</td>
</tr>
<tr>
<td>Greater East Texas Community Action Program (GETCAP)</td>
<td>Neighborhood Centers Inc.</td>
<td>Concho Valley Community Action Agency</td>
<td>West Texas Opportunities, Inc.</td>
</tr>
<tr>
<td>Brazos Valley Community Action Agency, Inc.</td>
<td>Community Action Committee of Victoria, Texas</td>
<td>Dallas County Department of Health and Human Services</td>
<td>Nueces County Community Action Agency</td>
</tr>
<tr>
<td>Community Action Corporation of South Texas</td>
<td>City of Fort Worth</td>
<td>Travis County</td>
<td>South Plains Community Action Association, Inc.</td>
</tr>
<tr>
<td></td>
<td>Economic Opportunities Advancement Corporation of PR XI</td>
<td>Texoma Council of Governments</td>
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</tbody>
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* Schedule is subject to change based on production and/or other unforeseen circumstances.

### Fiscal/Administrative (F/A)

These reviews will typically be done as a desk review. As often as possible, the F/A reviews will happen in the same month as the technical visit to hopefully end with one comprehensive WAP monitoring report. F/A reviews will be done by any available qualified compliance staff.

### Technical/Inspections

These reviews will always be conducted onsite. Inspections will be conducted by state staff that are QCI certified. Full QCI inspections will be conducted on each unit reported as "inspected" by the state. Inspection percentages at each Subrecipient will be based off QCI staff and separation of assignments in accordance with WPN 15-4 (5 or 10%). TDHCA staff will also conduct LIHEAP inspections on the same trip to minimize visits to the Subrecipient, which is why trips begin so early in the DOE program year, because LIHEAP program year ends December 31.
Quoted from the TDHCA Fiscal Year 2019 Monitoring Plan

**Monitoring Schedule**

The Fiscal Year 2019 monitoring schedule is aggregate in nature. The schedule is created on an as-risk assessed basis. The schedule is maintained on the Compliance Subrecipient Monitoring (CMSM) Calendar in Outlook. A tentative schedule for CSBG and DOE is provided in accordance with the State Plan addendum.