

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

**(Grant Number: EE0007930, State: MO, Program Year: 2019)**

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

**V.1 Eligibility**

**V.1.1 Approach to Determining Client Eligibility**

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

In accordance with the federal Low-Income Weatherization Assistance Program (WAP) regulations, the income eligibility level for the program is established at 200 percent of federal poverty level. The annual revision of poverty income guidelines were made available in WPN 19-3 on February 6, 2019. The state informed each subgrantee of the new income guidelines upon the release of WPN 19-3. The State will inform each Subgrantee when new revisions are made available.

Describe what household eligibility basis will be used in the Program

All household income for a minimum of three consecutive calendar months prior to the date of the application must be recorded by the subgrantee to verify the income eligibility. Income documentation is required for all wage earners who reside in the home. If an individual adult (over the age of 19) claims no income, a written statement declaring such, which is signed by that individual, is sufficient documentation and must be kept in the client file as well as uploaded to the online reporting system called MoWAP. If no one in the home claims any income, a notarized zero-income form must be completed and signed by the applicant. Households that have been deemed income eligible for LIHEAP assistance may use their LIHEAP eligibility as verification of income.

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

As instructed by the U.S. Department of Energy (DOE), the State of Missouri will follow guidance provided by the U.S Department of Health and Human Services (HHS) under the Low Income Home Energy Assistance Program (LIHEAP) to ensure that "Qualified Aliens" are eligible for weatherization benefits.

"Qualified Aliens" are defined in section 431 of Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), commonly known as the welfare reform law. The Act covers the larger groups of legal immigrants (legal permanent residents, refugees, asylees, individuals paroled into the U.S. for a period of at least 1 year, individuals whose deportation has been withheld, individuals granted conditional entry, and certain individuals who are victims of domestic abuse). Qualified aliens are eligible to receive assistance and services under the WAP program so long as they meet other WAP program requirements.

**V.1.2 Approach to Determining Building Eligibility**

Procedures to determine that units weatherized have eligibility documentation

No dwelling unit may be weatherized without documentation that the dwelling unit is an eligible unit. All household income must be calculated per DOE requirements, and income and home ownership documented.

Describe Reweathering compliance

According to federal regulations, homes previously weatherized between September 30, 1975, and September 30, 1994 are eligible to be re-weatherized. Any home completed after September 30, 1994, is not currently eligible to be re-weatherized with federal DOE funds.

Describe what structures are eligible for weatherization

1. Single Family: Single-family rental or owner-occupied units remain a priority for weatherizing as multi-family units tend to not consume as much

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energy per family as single-family units.

2. Multi-Family: Multi-family dwellings that receive WAP services must follow the single family average cost per unit limitations.

3. Shelters: A shelter is defined in 10 CFR Part 440.3 as a dwelling unit or units whose principal purpose is to house, on a temporary basis, individuals who may or may not be related to one another and who are not living in nursing homes, prisons, or similar institutional care facilities. Subgrantees are authorized to weatherize shelters for the homeless, group homes or homes providing transitional living if the buildings are owned or rented by a not-for-profit agency and are used exclusively to provide temporary living quarters for the homeless, battered women or other WAP-eligible people as defined under 10 CFR Part 440.3.

**State Historic Preservation Officer (SHPO) Programmatic Agreement**

Section 106 of the National Historic Preservation Act of 1966 stipulates that all federally funded projects be reviewed to take into account the effect the proposed project will have on any property that is included in, or eligible for inclusion in the National Register of Historic Places. In order to comply with Section 106, DED-DE has signed an Interagency Agreement with the Missouri State Historic Preservation Office (“SHPO”) (See Attachment 6.1 in the Missouri Technical Manual). This policy addresses operational changes to the Low-Income Weatherization Assistance Program that resulted from the agreement. Subgrantees are responsible for compliance with 36 CFR 800. Subgrantees may request advice, counsel or assistance from the State Historic Preservation Office or Division of Energy.

Describe how Rental Units/Multifamily Buildings will be addressed

The Missouri Department of Economic Development Division of Energy (DED-DE) permits rental units to be weatherized using special considerations. Benefits for weatherizing rental units include lowering energy bills when tenants pay utilities, longer-term preservation of properties as affordable housing and providing additional improvement to comfort of residents. When work is performed on any type of rental unit, DED-DE recognizes a potential for owners to receive undue enhancement benefits.

A building containing rental units may be weatherized if it is in compliance with income criteria and:

- 1) The subgrantee has written permission from the owner or their agent.
- 2) Not less than 66 percent (50 percent for duplexes and four-unit buildings, and certain eligible types of large multi-family buildings) of the dwelling units in the building:
  - a) are eligible dwelling units;
  - b) will become eligible dwelling units within 180 days under a local government, state, or federal program for rehabilitating a building, or making similar improvements, to the building.

In the Final Rule, published in the Friday, December 8, 2000, Federal Register/Vol. 65, No. 237, DOE offered flexibility by adding certain eligible types of large multi-family buildings to the list of dwellings that are exempt from the requirement that at least 66 percent of the units must be occupied by income eligible persons. In these large multi-family buildings, as few as 50 percent of the units, would have to be certified as eligible before Weatherization can be offered. This exception would apply only to those large multi-family buildings where an investment of DOE funds would result in a significant energy-efficiency improvement as a result of the upgrades to equipment, energy systems, common space, or the building shell. The eligibility of these large multi-family buildings will be reviewed on a case by case basis by DED-DE. By providing this flexibility, local agencies will be better able to select the most cost effective investments and enhance their partnership efforts in attracting leveraged funds and/or landlord contributions. This flexibility does not apply to any other type of multifamily unit.

The DED-DE recognizes a potential for landlords to receive undue enhancement benefits. Landlords are encouraged to provide a minimum of a 5 percent cash contribution of estimated labor and material project costs before weatherization work begins on a home. The amount of suggested contribution above the 5 percent cash contribution is left to the judgment of the subgrantee. However, for multi-family structures with 5 or more units, the state has determined the landlord will be required to contribute a minimum of 25 percent of the estimated weatherization project cost.

Undue enhancement is any work performed on a dwelling that cannot be expected to directly result in energy savings or the preservation of agency installed work related to energy savings. Subgrantees should only perform weatherization work that is based on the use of computerized audits as described in the Master Plan, Section V.4.2 weatherization measures, any identified necessary health and safety measures, as well as limiting repairs to the definition of incidental repairs.

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All rental units will have a landlord agreement signed by the landlord for permission before commencing work. This agreement also states the household will not be subjected to rent increases for two years without just cause

Describe the deferral Process

There are some situations in which a subgrantee should not weatherize an otherwise eligible unit. In order to deal with these situations, each subgrantee must adopt and adhere to this minimum deferral policy that has been developed by DED-DE. When implemented, this policy allows weatherization staff to defer a dwelling unit due to conditions or circumstances that may be outside the scope of the WAP or hazardous to the health and safety of the occupants or weatherization workers. A subgrantee may choose to expound on this minimum policy and develop a subgrantee specific deferral policy to meet the needs of the service area. If the policy is expounded upon, documentation of this expounded policy must be located at the subgrantee office and applied equally and without discrimination to all homes addressed in the subgrantees service area.

The following is the required minimum deferral policy. It is intended to list the more common conditions and situations a subgrantee may encounter while preparing to deliver weatherization services. This list is not intended to be all inclusive of those instances in which a subgrantee may choose not to weatherize a unit. In some instances, corrective measures by the client/owner may allow program services to proceed. In addition, the subgrantee may use alternative funding that is not administered by DOE WAP, to assist the client with corrective measures to allow the home to be weatherized. Health and safety remediation completed by another non-for-profit organization coordinated with weatherization work is allowable.

**1. Required Minimum Deferral Policy**

A subgrantee must withhold weatherization services under the following conditions:

- a. A single family dwelling unit is vacant.
- b. A dwelling unit is for sale or in foreclosure.
- c. A dwelling unit is scheduled for demolition.
- d. A dwelling unit is found to have structural problems that would make weatherization impossible, impractical, or would inhibit the installation of significant weatherization measures. Structural problems include, but are not limited to:
  - (1) Dwelling unit(s) lacking proper interior sheathing (drywall, paneling or lathe and plaster) on ceilings or exterior walls.
  - (2) Dwelling unit(s) lacking exterior sheathing (siding, sheathing, brick, etc.) that is designed and sold for exterior use. If the product manufacturer recommends paint or other finish to be applied to the exterior sheathing, this finish must be applied prior to weatherization.
  - (3) A mobile home that is improperly installed (for example inadequate supports, not level, not anchored down, etc.).
  - (4) The dwelling unit or parts thereof are being remodeled and this remodeling would inhibit or alter the installation of any weatherization measures.
  - (5) Unsafe wiring found in the dwelling that cannot be corrected as a part of weatherization and would inhibit the installation of weatherization measures or pose a threat to the health or safety of the crew, subcontractor or client.
  - (6) Major water or moisture issues found in the dwelling unit that cannot be corrected as a part of weatherization. These would include, but are not limited to plumbing leaks, roof leaks, and standing water in foundation areas.
  - (7) Severe mold issues that are beyond the scope of weatherization. These would include, but are not limited to moldy areas larger than about 10ft<sup>2</sup>, mold in HVAC system or mold caused by sewage or other contaminated water.
  - (8) The dwelling unit is deemed by the auditor to pose a threat to the health or safety of the crew, subcontractor or client and will not be remediated by weatherization work or another program in conjunction with weatherization.
- e. A dwelling unit is uninhabitable (for example, a burned out apartment), condemned or there are "red tagged" health and safety conditions that cannot be corrected as a part of weatherization.
- f. The client, or family member, is uncooperative with the weatherization subgrantee, either in demanding that certain work be done, refusing

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priority work which is needed that is not deemed as a legitimate refusal by the subgrantee, by being physically or verbally abusive to the work crew or subcontractor, or by being unreasonable in allowing access to the unit. Every attempt should be made to explain the program and the benefits of the work.

g. Obvious discrepancies are found between the information supplied by the client on the application and observed conditions at the time of weatherization. The subgrantee must resolve these discrepancies before weatherization work can continue.

h. If at any time the subgrantee determines that the client is no longer eligible or subgrantee personnel believe that circumstances may have changed, the unit shall not be weatherized until updated information can be obtained from the client.

i. There is an infestation of rats, bats, roaches, reptiles, insects or other vermin.

j. There are existing health or safety hazards, to the weatherization workers, that must be corrected before weatherization services may begin. These may include, but are not limited to:

(1) There are animals on the premises that are not appropriately contained.

(2) The presence of animal feces and/or other excrement.

(3) Unvented space heaters are present in the home and the unvented space heater regulations outlined in the Technical Manual, Section III, Subsection G, Topic 2 cannot or will not be met.

(4) Excessive garbage, trash or debris that may pose a health and safety risk or would prevent the installation of weatherization measures.

(5) The presence of hoarding prevents the installation of weatherization measures.

k. Diagnostic tests cannot be performed at the initial audit. Reasons for this would include the dwelling unit lacking fuel or electric at the time or lack of cooperation from the client.

l. There are illegal drugs or illegal activities occurring on the premises.

m. The eligible household members move from the dwelling unit where weatherization activities and services are in progress. In such a case, the subgrantee must determine whether to complete the work and the circumstances must be documented in the client file. It is recommended to contact DED-DE prior to making this determination.

## **2. Documentation**

In the event that a subgrantee defers a dwelling unit, the subgrantee must notify the client and owner/authorized agent in writing. The notification needs to be signed by the client and a copy of the signed notification shall be provided to the client and a copy kept in the client file. Alternatively, a certified letter with the notification may be mailed to the client and a copy of the notification and return receipt shall be kept in the client file. If the client cannot be notified in writing as described above, contact DED-DE for further guidance. All correspondence justifying the decision to defer the dwelling unit must be kept in the client file.

The notification must include the following items:

a. The nature and extent of the problem(s) and how the problem(s) relate to the determination to defer the unit.

b. Any and all corrective actions required before weatherization services can be considered.

c. A time limit for correcting problems so that weatherization services may be rescheduled. A minimum time frame of 30 days for correction of the problems must be provided; however, more time may be granted depending on the circumstances.

d. The right of appeal and whom the client may contact from the subgrantee with an appeal.

## **V.1.3 Definition of Children**

Definition of children (below age): **19**

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**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.

Subgrantees will provide assistance to low-income Native Americans and other low-income persons on an equal basis.

**V.2 Selection of Areas to Be Served**

Services will be offered throughout the state of Missouri. Current service areas are based on the geographic boundaries of the state's Community Action Agencies (CAAs). The DED-DE administers federal funds to seventeen regional Community Action Agencies, and one not-for profit organization.

Using recommendations provided by the Missouri Weatherization Policy Advisory Council (MWPAC), the allocation methodology is based upon a \$40,000 base for each subgrantee, a separate subgrantee Training and Technical Assistance (T&TA) allocation, with the remainder of the funds allocated to the subgrantees based on the U.S. Census poverty/population data.

**V.3 Priorities**

Priority will be given to low-income elderly, persons with disabilities, and families with children. High Energy User and High Energy Burden are allowed criteria, but not mandatory. If a subgrantee chooses to use High Energy User or High Energy Burden as a priority criterion, they will be required to report this information to DED-DE. The DED-DE will report all subgrantee High Energy User and High Energy Burden information to DOE on the quarterly program report. The Missouri Low-Income Weatherization Assistance Program Operations Manual details client selection criteria including program priorities.

**V.4 Type of Weatherization Work to Be Done**

**V.4.1 Technical Guides and Materials**

The state is committed to providing quality weatherization service on each client's home. With limited resources available, funds must be used to provide services which will result in the greatest savings per dollar. The state believes it is essential to use a process that correctly identifies energy conservation measures (ECMs) that provide the greatest chance to reduce energy consumption, maximize savings, and increase client comfort. It is also important that the selection of ECMs does not compromise the health and safety of the client. All work being performed will be in accordance to the DOE-approved energy audit procedures and 10 CFR 440 Appendix A, as outlined in the DED-DE program operation manuals outline.

Types of work that may be done include:

- Air leakage reduction
- Attic insulation
- Wall insulation
- Foundation and floor insulation
- Duct insulation
- Heating system clean and tunes, repairs, and replacements
- Health and safety

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- Lighting retrofits
- Hot water heaters
- Air Condition (window unit and central air unit)
- Refrigerator Replacement

Additionally, Missouri is considering the implementation of a pilot solar project. If Missouri determines to initiate a pilot solar project, DOE will be contacted for proper procedures at that time.

Distribution of Field Guides and Standard Work Specifications to all subgrantees for all staff and contractors were made available digitally in the fourth quarter of PY2017. A new updated version of the Program Procedural Operational Manual and the Program Technical Operational Manual were distributed and reviewed during the state annual training in November 2018. The grantee will ensure that materials are received by the appropriate parties as a part of the in progress visits during technical monitoring.

All subgrantee agreements and vendor contracts will contain language that documents the Standard Work Specifications for work quality outlined in WPN 15-4, Section 2, and as outlined in the Missouri Weatherization Program Operational Manual. All work being performed must be in accordance to the DOE-approved energy audit procedures and 10 CFR 440 Appendix A. All subgrantee contracts with their work providers are required to contain the following clause:

*“All work performed with funding administered by the Department of Economic Development-Division of Energy (DED-DE) Weatherization Assistance Program must meet the objectives and specifications outlined in the Standard Work Specifications for Home Energy Upgrades and the Missouri Weatherization Program Technical Manual. All work will be inspected and validated by a certified Quality Control Inspector before being submitted for reimbursement.”*

Signed subgrantee contracts with their work providers are reviewed annually during on-site monitoring to ensure contracts are current and in compliance with all required contract clauses.

*Field Guide Approval Dates:*

Single Family: 4/6/2018

Manufactured Housing: 4/6/2018

Multi-Family: 7/31/2018

Field guide types approval dates

Single-Family: 4/6/2018
Manufactured Housing: 4/6/2018
Multi-Family: 7/31/2018

**V.4.2 Energy Audit Procedures**

Audit Procedures and Dates Most Recently Approved by DOE

Audit Procedure: Single-Family
Audit Name: Other (specify)
<input type="text" value="NEAT approved by DOE on May 19, 2015"/>
Approval Date: 5/19/2015

Audit Procedure: Manufactured Housing
Audit Name: Other (specify)
<input type="text" value="MHEA approved by DOE on May 19, 2015"/>
Approval Date: 5/19/2015

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Audit Procedure: Multi-Family
Audit Name: Other (specify) NEAT approved for small multi-family buildings of 2-4 units by DOE on 5/19/15. Multi-family buildings of 5 units or greater will be audited as described in the V.5.2 comments, and must be submitted to DOE and DED/DE for approval prior to work commencing.
Approval Date: 5/19/2015

**Comments**

Approximately 10 percent of units weatherized in Missouri are multi-family units. Multi-family buildings of 2 to 4 units will be evaluated using the NEAT audit. Multi-family buildings of 5 to 25 units that are individually heated and cooled will be evaluated using the NEAT audit. Multi-family buildings of greater than 25 units or buildings with 5 or more units that are not individually heated and cooled will be required to audit the building using a DOE and DED-DE approved multi-family audit assessment (MulTEA, TREAT, EA-QUIP or an engineering assessment). All multi-family buildings of 5 or more units audited using a DOE and DED-DE approved multi-family audit assessment, or an engineering assessment, must be submitted to DOE and DED-DE for approval prior to work commencing.

Missouri will submit a request package no later than November 15, 2019 for re-approval for the continued use of the current audit programs.

**V.4.3 Final Inspection**

No dwelling unit may be reported to DOE as completed until all weatherization measures have been installed according to the work plan, or as documented in a change order request, and the subgrantee, or its authorized representative, has conducted a final inspection and certified that the work has been completed in a professional manner in accordance with WAP work standards, Standard Work Specifications, and in accordance with the priority determined in 10 CFR 440. In addition, DED-DE also requires that all invoices associated with a dwelling unit have been received by the subgrantee. Units with estimated expenses will not be reimbursed.

All units will have a final inspection performed by a certified Quality Control Inspector (QCI). Missouri will validate the QCI credentials of each person performing a QCI inspection. The QCI will include an assessment of the original audit and confirm that the measures called for on the work order were appropriate and in accordance with Missouri and approved protocols, as given in the Master File V.4.1: Technical Guides and Materials. Homes that are not adequately inspected to the approved protocols will not be considered complete and will not be eligible for reimbursement as a completed home. Missouri will adhere to the DOE Prescribed QCI policy as described in WPN 15-4 Section 3, using both the Independent QCI and Independent Auditor/QCI.

All subgrantees without a certified QCI on staff must provide an Action Plan to the grantee detailing how the subgrantee will ensure that all final inspections are performed by a certified QCI.

Missouri will perform QA monitoring on the QCI to ensure inspections of units are being followed according to standards adopted by the state and consistent with the Standard Work Specifications (SWS). The inspection forms that will be used by grantee monitors to ensure that work is completed in accordance with WPN 15-4 Section 1 are attached [QCI\_TMF (2).pdf]. If it is determined that subgrantee QCI process is inadequate the procedures as outlined in the Master File V.7.3 will be followed.

**V.5 Weatherization Analysis of Effectiveness**

The DED General Terms and Conditions for Federal Subgrants, subgrant Scope of Services, and Subgrant Assistance Agreement detail criteria deemed necessary for a Subgrantee to be considered in contract compliance with the state. Performance evaluations will be conducted throughout the grant period.

DED-DE evaluates subgrantee agencies to determine actual homes weatherized versus planned goals. Expenditures are reviewed to ensure a proper rate of grant expenditure. The reviews also evaluate both housing quality and procedural monitoring findings from on-site visits. In addition, DED-DE will evaluate each subgrantee to help ensure that WAP funds are being used efficiently and effectively to serve the public.

If production and/or expenditures are deemed insufficient, DED-DE may recapture and redistribute funds to other, high performing subgrantees. The DED-DE will offer assistance, as resources allow, to help subgrantees increase production to successful performance levels. This assistance may include specific technical or administrative training for subgrantee staff.

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In the effort to help subgrantee production and expenditure rates, DED-DE has provided additional hands-on training and developed a web page listing WAP technical training courses available from vendors throughout the state. DED-DE technical staff continues to train subgrantee personnel to more fully and correctly weatherize homes. Additionally, DED-DE provides comprehensive and specific training in accordance with WPN 15-4 and WAP Memorandum 034.

The Missouri Low-Income Weatherization Assistance Program Operations Manual details terms for probation and procedures to terminate a weatherization subgrantee.

A monitoring tool has been developed and used to evaluate technical error rates after monitoring visits and to evaluate compliance. This monitoring tool remains under constant review for effectiveness.

#### V.6 Health and Safety

See Health and Safety Plan Attachment

#### V.7 Program Management

##### V.7.1 Overview and Organization

The DED-DE administers the federal WAP statewide in Missouri. The DED-DE is organized into sections to provide measurable public benefit services to the citizens of the State of Missouri and that also contribute greatly to WAP. The WAP section contains the program management and technical staff. The program manager and other staff in the WAP section are responsible for the day-to-day operation of WAP including procedural and financial monitoring and technical monitoring of weatherized homes. The staff reviews and implements guidance and regulations regarding WAP. The technical staff is also responsible for performing housing inspections and providing technical assistance to the subgrantees. In addition, contract monitoring staff may be used as necessary. The Policy and Analysis section intervenes in utility rate cases to leverage more funding for WAP. The financial unit provides financial assistance in completion of the application for funding, subgrant assistance agreements, invoice processing, data collection and reporting, and assisting with procedural and financial monitoring.

Energy costs consume a far greater percentage of income in low-income households. In 2010, weatherized homes nationally saved \$2.1 billion. At current prices, home energy savings average \$283 each year. This allows low-income households to have more affordable energy bills and makes available more money for food, medicine, transportation and other necessities.

The WAP reduces energy consumption and utility bills, keeps money in the local economy, has a positive impact on the household's promptness of utility payments and arrearages and reduces environmental pollution.

WAP Goals:

- Effective management of state and federal weatherization funds.
- Continuation of improved weatherization services. Increased energy-efficient housing, long-term reduction in utility bills and the comfort and safety of those served.
- Close working relationships with local weatherization agencies and others that are engaged in delivery of services to citizens of the State of Missouri.

##### V.7.2 Administrative Expenditure Limits

Each program year, DED-DE allocates at least 5 percent of new funding to be allocated as administrative funds to the WAP agencies. Subgrantees are asked to submit budgets that reflect what they plan to spend in the upcoming year with supporting documentation. DED-DE reviews each subgrantee budget and will approve budgets that have justified WAP costs. DED-DE then uses the approved subgrantee budgets to determine state-wide budget categories. Per DOE guidelines, the state may authorize additional administrative funds up to 5 percent of an agency's budget for Subgrantees with less than \$350,000 of allocation of federal WAP funds. To request this higher amount, a Subgrantee must document a need for additional administrative funds for WAP-related issues and obtain prior approval from DED-DE. These costs will be monitored by the DED-DE.



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**V.7.3 Monitoring Activities**

See Attachment V-7-3 PY19 Monitoring Activities.pdf

**V.7.4 Training and Technical Assistance Approach and Activities**

The goals of the Missouri WAP are to provide effective management of federal, state and local funding; continuation of improved weatherization services, increased energy efficient housing, long-term reduction in utility bills and comfort and safety of those served.

T&TA is an essential strategy to meet the goals of the Missouri Low-Income Weatherization Assistance Program. The following details training activities:

**A. Assessment of Training Needs for Local Weatherization Agencies:**

Monitoring oversight and agency reporting are indicators of local agency productivity and quality of weatherization retrofit. Training needs are identified through this monitoring oversight and addressed when needed. Additionally, training needs will be identified as needed to reflect feedback from DOE Project Office monitoring visits, internal state audits, Inspector General reports, etc.

Personnel inventories and surveys are used to determine the type of training required and the best means of providing instruction. Inventory and analysis of agency personnel, equipment, advanced technologies and protocols are used to determine the status of each agency's efforts in implementing new technologies; identifying agencies that are available to assist others in implementing new or advanced technologies.

T&TA meetings are held quarterly with the weatherization director's Energy Housing Professional Alliance group. The Technical Work Group Committee meets as needed to discuss updates and changes needed to stay current with policy. Regional trainings are provided by DED-DE when needed due to programmatic changes or if other training needs are identified on a statewide level.

Subgrantees and contractors will be checked at least annually for compliance with certification requirements such as QCI, Lead Safe, OSHA 10 (required within 60 days of hire for crew members), OSHA Confined Space for Construction and Weatherization Related Mold and Mildew training. Credentials are tracked by DED-DE by staffing updates being reported to DED-DE. The worksite will be checked for compliance with required health and safety equipment, personal protection gear, and reference materials. Training will be targeted to ensure necessary fulfillment and maintenance of the credentials and the implementation of DOE and DED-DE standards. If T&TA funds are used to train contractors at the subgrantee level, a retention agreement should be obtained in exchange for the training.

**B. Productivity of Agencies and Development of T&TA Activities and Priorities:**

Monitoring oversight and agency reporting are indicators of local agency productivity and quality of weatherization retrofit. Advanced energy audit procedures (NEAT) are used for single-family dwelling units and (MHEA) are used for mobile home dwelling units. Advanced energy audits approved by the U.S. DOE and the DED-DE are used for multi-family dwelling units. A minimum savings-to-investment ratio of 1.0 is used as a threshold for the application of weatherization measures.

Although DED-DE does not compare the effectiveness and energy savings achieved between subgrantees (each subgrantee has a different housing stock and Missouri ranges between two different climate zones which makes it difficult to compare the effectiveness and energy savings between subgrantees) DED-DE does however track the subgrantees target infiltration reduction compared to the actual infiltration reduction. DE staff then provides training for those subgrantees with significant discrepancies between the target and actual reductions.

Inventory and analysis of agency personnel, equipment, advanced technologies and protocols are used in a variety of ways including:

- Determining the status of each agency's efforts in implementing new technologies
- Identifying agencies that are available to assist others in implementing new or advanced technologies
- Development of priorities within annual training plans.

**C. Anticipated T&TA Activities:**

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DOE requires comprehensive and specific training for grantee and subgrantee staff, as outlined in WPN 15-4, Section 4 and WAP Memorandum 034. To comply with the comprehensive training requirements, Missouri currently has a contract with Santa Fe Community College (SFCC) for comprehensive training for PY2019 with options of renewal through PY2022. SFCC will provide comprehensive International Renewable Energy Council (IREC) accredited training for the National Renewable Energy Lab (NREL) Job Task Analysis (JTAs) (Quality Control Inspector, Energy Auditor, Crew Leader, and Retrofit Installer). Missouri intends to have a minimum of two comprehensive trainings per year pertaining to the NREL JTAs; however, training frequency may vary as training needs are determined. All subgrantee staff with job duties covered by the NREL JTAs must receive comprehensive training over a four year period. The focus of the training will be tailored to the needs of the subgrantees by determination as described earlier in V.7.4.

To comply with the specific training requirements of WPN 15-4 Section 4 and implementation of the health and safety plan, Missouri anticipates providing a statewide training in PY19 that will coincide with the update of the Missouri Weatherization Operations Manual. Additional regional trainings are anticipated for subgrantee technical staff and on-site technical and procedural training as needed. All subgrantees are highly encouraged to attend the DED-DE provided trainings. If subgrantees do not attend the DED-DE trainings, on-site trainings will be conducted as needed.

DED-DE staff training will include the Home Performance Coalition Conference, the DOE National Weatherization Conference and the National Association for State Community Services Programs (NASCS) National Conference. Additional training for DED-DE staff will be determined on an as needed basis.

**D. Client Education:**

Client education is an effective method of improving the impact of weatherization measures. These efforts include fact sheets, brochures, the state DED-DE WAP website, and one-on-one communication. Subgrantees play a vital role in expanding client education activities at the local level. Local activities include client workshops, providing Energy Saver Booklets, client interviews and instruction when auditing and final inspecting the home, the explanation of information found in the Lead, Radon, and Mold EPA pamphlets, local newspaper articles, and radio and television spots.

*Percent of overall trainings:*

Comprehensive Trainings: 50

Specific Trainings: 50

*Breakdown of T&TA training budget:*

Percent of budget allocated to Auditor/QCI trainings: 65

Percent of budget allocated to Crew/Installer Trainings: 25

Percent of budget allocated to Management/Financial trainings: 10

Percent of overall trainings

Comprehensive Trainings:	<input type="text" value="50.0"/>
Specific Trainings:	<input type="text" value="50.0"/>

Breakdown of T&TA training budget

Percent of budget allocated to Auditor/QCI trainings:	<input type="text" value="65.0"/>
Percent of budget allocated to Crew/Installer trainings:	<input type="text" value="25.0"/>
Percent of budget allocated to Management/Financial trainings:	<input type="text" value="10.0"/>

**V.8 Energy Crisis and Disaster Plan**

**Disaster Plan:**

Declaration of a disaster for WAP purposes is determined by a Presidential or Gubernatorial order declaring either a federal or state emergency. It may be the result of natural or man-made factors. WAP, through its subgrantee network, will assist state and community authorities in normalizing areas affected by a disaster by providing WAP resources, in a limited capacity, to assist Missouri low-income citizens in recovering and rebuilding after the disaster. As per

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DOE WPN 12-07, the use of DOE WAP funds is limited to eligible weatherization activities and the purchase and delivery of weatherization materials. WAP will adhere to the following guidelines when responding to any disasters in which the low-income population has been affected. These guidelines are intended to maximize the assistance we are able to provide while protecting the limited resources of the program.

Disaster-mitigation planning activities shall be implemented as soon as practical after the declaration of a disaster. A WAP subgrantee shall not commit WAP resources (labor or financial) until it receives approval from the DED-DE.

DOE WAP funds used for disaster-related activities will be allocated based on the extent of the disaster in each subgrantee area. WAP disaster funds may be utilized from the subgrantee's or DED-DE's unspent allocation. Funds must supplement, not supplant, other local, state or federal funds available for disaster assistance. All funds received by the client to cover damages must be considered prior to the allocation of WAP resources. Attachment 2-2, the Disaster Certification form located in the Missouri Weatherization Program Operational Manual, should be completed for each client requesting disaster assistance.

Safety measures, such as levees or other protections, should be in place prior to mitigation activities. Agency staff should consult with local utilities to ensure electric, gas and sewer hazards have been corrected or repaired.

**A. Allowable Disaster Activities**

Allowable expenditures under WAP include:

- 1) The cost of incidental repairs to an eligible dwelling unit if such repairs are necessary to make the installation of weatherization materials effective and,
- 2) The cost of eliminating health and safety hazards, elimination of which is necessary before the installation of weatherization materials (10 CFR 440.18(d)(9); 10 CFR 440.18(d)(15)). To the extent that the services are in support of eligible weatherization (or permissible re-weatherization) work, such expenditure would be allowable. For example, debris removal at a dwelling unit so that the unit can be weatherized would be an allowable cost. Debris removal from a dwelling unit that is not to be weatherized would not be an allowable cost. Please note that the \$7,105 per dwelling unit limit continues to apply.

NOTE: Permissible re-weatherization as per DOE guidelines state: In the event of a declared federal or state disaster, weatherization crews may return to a unit reported as a completion to DOE that has been "damaged by fire, flood or act of God to be re-weatherized, without regard to date of weatherization". 10 CFR 440.18(f)(2)(ii). Local authorities must deem the dwelling unit(s) salvageable as well as habitable and if the damage to the materials is not covered by insurance or other form of compensation.

3) Weatherization personnel can be paid from DOE funds to perform functions related to protecting the DOE investment. Such activities include: securing weatherization materials, tools, equipment, weatherization vehicles, or protection of local agency weatherization files, records and the like during the initial phase of the disaster response. Using DOE funds to pay for weatherization personnel to perform relief work in the community as a result of a disaster is not allowable.

4) Local agencies may use weatherization vehicles and/or equipment to help assist in disaster relief provided the WAP is reimbursed according to the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards 2 CFR Part 200.

**B. Eligibility Requirements**

WAP subgrantees must ensure that applicants for disaster assistance

- 1) Meet the current eligibility requirements,
- 2) Are located within the designated disaster area and
- 3) Have been directly affected by the disaster. Homes located in a Federal Emergency Management Agency (FEMA)-sanctioned area are not eligible for assistance.

Applicant homes must be certified as habitable, and a disaster certification form must be completed, signed and retained in the client file. The owner of a rental unit must list the property with Section 8 or provide other proof that the unit will remain exclusively for the low-income. The standard landlord contribution will be requested or required, as applicable.

Client income eligibility may be based on one month's income if all other income documentation was lost in the disaster. WAP rules require that priority be given to identifying and providing weatherization assistance to elderly persons, persons with disabilities, families with children, high residential energy users, and households with high energy burdens (10 CFR 440.16(b)). However, it would be permissible to consider households located in the disaster area, as a

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priority as long as the households are eligible and meet one of the priorities established in regulation and are free and clear of any insurance claim or other form of compensation resulting from damage incurred from the disaster.

**C. Procurement of Equipment and Weatherization Materials**

All purchased items must meet minimum energy-efficiency ratings as detailed in 10 CFR 440, Appendix A. Subgrantees must comply with all requirements specified in 2 CFR 200 and 10 CFR 440 and the requirements specified in the DED-DE General Terms and Conditions for Federal Subgrants, Missouri Weatherization Operational Program Manual's Competitive Procurement Standards.

**D. Additional Non-DOE WAP Funding**

If additional funds are received from the state or other non-DOE fund sources, a subgrantee may allocate up to \$10,000 per unit.

**E. Disaster Expenditures Accountability and Reporting**

Disaster expenditures must be accounted for and reported separately from other costs. The monthly MoWAP reimbursement must show these expenses under "disaster". The costs will be included in the averages.