

Nebraska  
Department of  
Environment and Energy  
Weatherization Assistance Program

Program Year 2021 State Plan  
July 1, 2021 – June 30, 2022

Department of Environment and Energy

Jim Macy, Director

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402-471-3682

**WEATHERIZATION ASSISTANCE PROGRAM**  
**STATE PLAN – 2021 PROGRAM YEAR**  
**July 1, 2021 – June 30, 2022**

**Executive Summary**

The Nebraska State Weatherization Assistance Program (WAP) Plan for Program Year (PY) 2021 serves as Nebraska’s application to the US Department of Energy (USDOE) for WAP funding. These funds will provide assistance to approximately two hundred and five (205) households across the State.

The purpose of the Program is to install energy conservation measures in the homes of income-eligible persons, especially homes occupied by the elderly, persons with disabilities, and families with children. Funds are targeted to the most cost-effective energy efficiency measures, as determined by an on-site energy audit of the eligible building. The program helps to reduce national energy consumption and related emissions and lessens the impact of higher energy costs for low-income families. The program also improves the health and safety (H & S) of assisted households.

Nebraska relies on a network of seven (7) Subgrantee Community Action Partnerships (CAP) and one (1) non-profit agency, all which have an extensive experience in delivering weatherization and affordable housing services in their designated service areas. Subgrantees provide energy efficiency weatherization services using their own trained crews and by subcontracting work to qualified contractors. Energy efficiency measures financed through the program can range from air sealing and insulating to replacement of heating systems. The program assists all types of housing units, including single- and multifamily housing, manufactured housing, and group homes. The Nebraska Department of Environment and Energy (NDEE) will allocate program funds for the PY2021 in accordance with this plan.

## I.1 Budget

2021 Program Year Allocation – USDOE	\$3,019,814.00
2020 Program Year projected carryover	1,400,000.00
Training and Technical Assistance	\$545,267.00
Nebraska Department of Environment and Energy Administration	\$226,486.05
Subgrantee Administration	\$226,486.05
CPA Audits	\$12,000.00
Liability Insurance	\$23,517.14
Health and Safety (21%)	\$417,061.00
Program Operations	\$1,469,173.00

*The activities described in the State WAP Plan are subject to final approval of appropriations to the U.S. Department of Energy and receipt of federal funding the Nebraska Department of Environment and Energy. The Nebraska Department of Environment and Energy reserves the right to modify or withdraw the State WAP Plan if and to the extent such funding is not received.*

## I.2 Proposed Weatherization Projects

USDOE

### Allocation

<u>Subgrantee</u>	<u>PY2021</u>
Blue Valley Community Action Partnership	\$209,722.80
Central Nebraska Community Action Partnership	\$309,227.52
Northeast NE Community Action Partnership	\$331,588.13
Community Action Partnership of Lancaster & Saunders Counties	\$320,407.82
Community Action Partnership of Mid Nebraska	\$336,060.25
Northwest Community Action Partnership	\$309,227.52
Southeast Nebraska Community Action Partnership	\$203,014.62
Habitat for Humanity of Omaha	\$365,129.04

## I.3 Summary of Major Changes for the 2021 Program Year

In PY2021, an average per dwelling unit limit for Health & Safety expenditures of \$1,500 has been established, based on historical data. Units that exceed the \$1,500.00 limit must receive approval from NDEE on a case-by-case basis.

## IV.1 Subgrantee

In accordance with 10 CFR Part 440, an entity that receives funds from the Department of Environment and Energy to manage a weatherization project is considered a WAP Subgrantee. The Department of Environment and Energy enters into a Financial Assistance Subaward with Subgrantees to perform WAP services within specified service areas throughout the State.

### Blue Valley Community Action Partnership

PO Box 273  
620 5<sup>th</sup> Street  
Fairbury, NE 68352

Type of Organization: Community Action Partnership agency

Source of Labor: Private Contractors and Crews

Contact: Brandon Bonar Email: [bbonar@bvca.net](mailto:bbonar@bvca.net)

Phone: 402-729-2278 Fax: 402-729-2801

Counties Served: Butler Fillmore Gage  
Jefferson Polk Saline  
Seward Thayer York

#### PY2021

USDOE Allocation: \$ 209,722.80

Minimum Units: 16

Congressional districts served and	<u>Congressional District (CD)</u>	<u>Percent</u>
percent of Subgrantee allocation:	01	69%
	03	31%

### Central Nebraska Community Action Partnership

PO Box 509  
626 N. Street  
Loup City, NE 68853

Type of Organization: Community Action Partnership agency

Source of Labor: Crews

Contact: Amber Beck Email: [abeck@centralnebraskacap.org](mailto:abeck@centralnebraskacap.org)

Phone: 308-745-0780 Fax: 308-745-0824

Counties Served: Blaine Boone Boyd  
Brown Colfax Custer  
Garfield Greeley Hall  
Hamilton Holt Howard  
Keya Paha Loup Merrick  
Nance Platte Rock  
Sherman Valley Wheeler

**PY2021**

USDOE Allocation: \$309,227.52

Minimum Unit: 24

Congressional districts served and percent of Subgrantee allocation:	<u>CD</u>	<u>Percent</u>
	01	05%
	03	95%

**Northeast Nebraska Community Action Partnership**

603 Earl St.  
PO Box 667  
Pender, NE 68047

Type of Organization: Community Action Partnership agency

Source of Labor: Private Contractors

Contact: Pam Browning Email: [pbrowning@nencap.org](mailto:pbrowning@nencap.org)

Phone: 402-385-6300 ext.274 Fax: 402-385-6310

Counties Served: Antelope Burt Cedar  
Cuming Dakota Dixon  
Dodge Knox Madison  
Pierce Stanton Thurston  
Washington Wayne

**PY2021**

USDOE Allocation: \$331,588.13

Minimum Units: 26

Congressional districts served and	<b><u>CD</u></b>	<b><u>Percent</u></b>
percent of Subgrantee allocation:	01	78%
	03	22%

**Community Action Partnership of Lancaster and Saunders Counties**

210 "O" Street  
Lincoln, NE 68508

Type of Organization: Community Action Partnership agency

Source of Labor: Private Contractors

Contact: Vi See Email: [vsee@communityactionatwork.org](mailto:vsee@communityactionatwork.org)

Phone: 402-471-4515 Fax: 402-471-4844

Counties Served: Lancaster Saunders

**PY2021**

USDOE Allocation: \$320,407.82

Minimum Units: 25

Congressional districts served and	<b><u>CD</u></b>	<b><u>Percent</u></b>
percent of Subgrantee allocation:	01	100%

**Community Action Partnership of Mid Nebraska**

PO Box 2288  
16 W 11<sup>th</sup> Street  
Kearney, NE 68848-7440

Type of Organization: Community Action Partnership agency

Source of Labor: Private Contractors and Crews

Contact: Jackie Harpst Email: [jharpst@mnca.net](mailto:jharpst@mnca.net)

Phone: 308-865-5675 Fax: 308-865-5681

Counties Served:	Adams	Arthur	Buffalo	Chase	Clay
	Dawson	Dundy	Franklin	Frontier	Furnas
	Gosper	Grant	Harlan	Hayes	Hitchcock
	Hooker	Kearney	Keith	Lincoln	Logan
	McPherson	Nuckolls	Perkins	Phelps	Red Willow
	Thomas	Webster			

**PY2021**

USDOE Allocation: \$336,060.25

Minimum Units: 26

Congressional districts served and	<b><u>CD</u></b>	<b><u>Percent</u></b>
percent of Subgrantee allocation:	03	100%

**Northwest Community Action Partnership**

270 Pine Street  
Chadron, NE 69337

Type of Organization: Community Action Partnership agency

Source of Labor: Private Contractors and Crews

Contact: Floyd Merkel Email: [fmerkel@ncap.info](mailto:fmerkel@ncap.info)

Phone: 308-432-3393 Fax: 308-432-5799

Counties Served:	Banner	Box Butte	Cherry	Cheyenne	Dawes
	Deuel	Garden	Kimball	Morrill	Scotts Bluff
	Sheridan	Sioux			

**PY2021**

USDOE Allocation: \$309,227.52

Minimum Units: 24

Congressional districts served and	CD	Percent
percent of Subgrantee allocation:	03	100%

**Southeast Nebraska Community Action Partnership**

P.O. Box 646  
802 4<sup>th</sup> Street  
Humboldt, NE 68376

Type of Organization: Community Action Partnership agency

Source of Labor: Private Contractors

Contact: Gin Christiansen

Email: [gchristiansen@senca.org](mailto:gchristiansen@senca.org)

Phone: 402-862-2411 ext.116

Fax: 402-862-2428

Counties Served:      Cass                      Johnson                      Nemaha                      Otoe  
                                 Pawnee                      Richardson                      Sarpy

**PY2021**

USDOE Allocation:      \$203,014.62

Minimum Units: 15

Congressional districts served and  
percent of Subgrantee allocation:

<u>CD</u>	<u>Percent</u>
01	42%
02	49%
03	9%

**Habitat for Humanity of Omaha**

1701 N 24<sup>th</sup> Street  
Omaha, NE 68110

Type of Organization: 501(C)3 Non-profit entity

Source of Labor: Contractor

Contact: Danyelle Baratta

Email: [dbaratta@hatitaomaha.org](mailto:dbaratta@hatitaomaha.org)

Phone: 402-884-6626

Fax: 402-457-4012

Counties Served:      Douglas

**PY2021**

USDOE Allocation:      \$365,129.04

Minimum Units: 31

Congressional districts served and  
percent of Subgrantee allocation:

<u>CD</u>	<u>Percent</u>
02	100%



## IV.2 WAP Production Schedule

PY2021

Average Unit Costs Including Re-weatherization	\$ 7,669.00
Total Funds – Federal	\$3,159,918.00
Total Carryover	\$1,400,000.00
Total Units to be Weatherized	187
Total Units to be Re-weatherized	18
Total Units to be weatherized and Re-weatherized	205
Total Vehicle and Equipment Budget	\$0.00
Average Vehicle and Acquisition Cost Per Unit	\$0.00
Total Funds for Program Operations	\$1,48,261.00

## IV.3 Energy Savings & Program Impact

### Method Used to Calculate Savings: WAP Algorithm

Estimated Energy Savings: 29.3 MBtus per completed unit. Total annual estimated energy savings resulting from USDOE appropriated funds: 6,007 MBtus.

## IV.4 USDOE-Funded Leveraging Activities

No leveraged funds are identified for this program year.

## IV.5 Policy Advisory Council Members

As required by federal regulations, a Policy Advisory Council (PAC) assists in the development and implementation of the WAP and advises the Department of Environment and Energy on a broad range of issues relating to WAP. The PAC is broadly representative of organizations that provide services to low-income persons in Nebraska.

<u>Member</u>	<u>Representing</u>
Matt Thomsen	Elderly Nebraskans – Nebraska Department of Health & Human Services
Ashley Frevert	Low Income Nebraskans – Community Action Nebraska
Karen Wobig	Elderly & Children (under six) – Lancaster County Extension Service
Jerry Bryan	Disabled -Nebraska Client Assistance Program
Ken Inness	Low Income Housing - Prairie Gold Homes

Steve Zach	Utility - Nebraska Public Power District
Lynn Kohout	Low-income, elderly, persons with disability - Nebraska Department of Economic Development
Georja Kriebs	Native American representative, Ponca Tribe of Nebraska

## IV.6 State Plan Hearings and Transcripts

A public hearing was held to receive public input on the PY2021 State Plan at [10:00 am Monday, April 27, 2021] at the Nebraska Department of Environment and Energy. Notice of the meeting was published in the Omaha World Herald and posted on the Public Hearing section of the Nebraska Department of Environment and Energy's website at <http://dee.ne.gov/Press.nsf/PNall.xsp/> on April 16, 2021. **It was also distributed via email to all WAP program managers and agency executive directors. There were xx comments made during the public hearing.**

## IV.7 Miscellaneous

### Other Funding Sources

Low Income Home Energy Assistance Program (LIHEAP) funds have been directed into the weatherization program since 1982. The amount of LIHEAP funds available for weatherization during the PY 2021 are \$2,610,000.00 (Two million six hundred ten thousand dollars and zero cents). LIHEAP funds are used in accordance with all applicable USDHHS and Nebraska Department of Health and Human Services State Plan rules and regulations.

### Subgrantee Involved in the Leveraging Process

Most Nebraska Subgrantees operate other housing assistance programs that enable them to leverage resources from other funding sources.

### Liability Insurance

Subgrantees that employ private contractor labor to perform Weatherization services must ensure that each private contractor is adequately insured.

## V.1 Eligibility

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

### V.1.1 Approach to Determining Client Eligibility

#### Definition of Income Used to Determine Eligibility (Client Eligibility)

In accordance with USDOE Weatherization Program Notice 21-3, effective as of February 10, 2021, Low income will mean that income in relation to family size, which: (1) is at or below 200 percent of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget, or (2) is the basis on which cash assistance payments have been paid at any

time during the preceding twelve months under Titles IV and XVI of the Social Security Act, or (3) is the basis on which energy assistance payments have been paid under the Low Income Home Energy Assistance Program of 1981(LIHEAP), provided that such basis is at least 200 percent of the poverty level determined in accordance with the criteria established by the Director of the Office of Management and Budget.

- Subgrantees are reminded that the supporting documentation for applicants applying for weatherization that may be on a waiting list or for other reasons must have their eligibility documentation updated at least annually.

#### Procedures to Determine That Units Weatherized Have Eligibility Documentation (Household Eligibility)

All dwelling units certified as eligible for services shall be occupied by an income-eligible household family unit with income at or below 200 percent of the poverty level, or "which contains a member who has received cash assistance payments under Title IV or XVI of the Social Security Act or applicable State or local law during the twelve month period preceding the determination of eligibility for weatherization assistance," or which contains a member which has received energy assistance payments under the LIHEAP during the twelve month period preceding the determination of eligibility for weatherization assistance.

#### Qualified Aliens Receiving Weatherization Benefits:

Subgrantees must request documentation from WAP applicants and verify eligibility status through the Systematic Alien Verification for Entitlements (SAVE) Program. Such documentation can be provided to NDEE staff for eligibility verification.

The SAVE Program is a web-based service that helps federal, state and local benefit-issuing agencies, institutions, and licensing agencies determine the immigration status of benefit applicants so only those entitled to benefits receive them.

USDOE has directed grantees to guidance provided by Health and Human Services (HHS) under LIHEAP. This guidance can be found by going to <http://aspe.hhs.gov/hsp/immigration/restrictions-sum.shtml>. The Department of Environment and Energy registered for the SAVE Program to verify qualified alien status of Weatherization Program applicants for sub-grantees. Sub-grantees submit the required information to the Department of Environment and Energy who completes the verification process. The verification documentation is required as part of the Subgrantee Client Files.

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

#### Procedures to Determine that Units Weatherized Have Eligibility Documentation

Subgrantees are required to keep documentation in each client file for review during Program Compliance and Onsite Project monitoring visits by Department of Environment and Energy WAP staff. A minimum of 20 client files will be reviewed at each Subgrantee during Program Compliance monitoring to assess compliance with this requirement.

#### Reweathering Compliance

Subgrantees are required to retain records of all dwellings that received Federal funds including LIHEAP, HUD, or USDA "weatherization" activities. Dwellings may be reweatherized if 15 years have passed since the completion of original services and quality control inspection. Nebraska has been advised that additional implementation guidance of the new reweatherization policy is forthcoming. Nebraska will ensure compliance with any additional DOE guidance.

If a previously weatherized dwelling unit has been damaged by fire, flood, natural catastrophic weather or environmental occurrence, weatherization crews may return to a unit reported as a completion 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. The use of USDOE WAP funds is limited to eligible weatherization activities and the purchase and delivery of weatherization materials (WPN 16-7). No more than ten (10) percent of a Subgrantee's USDOE completions may be reweatherized without prior approval from the Department of Environment and Energy.

Addresses of completed weatherized units and dates they were completed are tracked by Subgrantees through the NDEE database system. Each agency references new applications to that database to comply with re-weatherization regulations in 10 CFR 440.18(f)(2)(iii) Allowable expenditures. The Department of Environment and Energy also uses a database to track WAP clients and retains client BCJO files for completed units for ten years. The database is used to cross-reference submitted completed units to already completed units. Subgrantees are also responsible to let the Department of Environment and Energy know when a unit is a re-weatherized unit.

#### Building Eligibility – Housing Types

Eligible housing types include owner and renter-occupied single-family homes, manufactured (mobile) homes, and multifamily buildings.

#### Historic Preservation

On November 6, 2020, the NDEE extended the Programmatic Agreement (PA) with the Nebraska State Historical Preservation Office (NSHPO) and the USDOE until December 31, 2030. Properties funded under the WAP are considered "undertakings" subject to review under Section 106 of the National Historic Preservation Act, 16 U.S.C. 470f (NHPA) and its implementing regulations at 36 CFR 800, and include rehabilitation, energy efficiency, retrofits, renewables, and weatherization (undertakings). SHPO contact information is available at the following link: <http://www.ncshpo.org/shpodirectory.shtml> click on the State of Nebraska to find the Nebraska SHPO contact information.

Section 110(k) of the NHPA applies to USDOE funded activities. Recipients shall avoid taking any action that results in an adverse effect to historic properties pending compliance with Section 106.

Dwellings that may be weatherized include:

1. Framed Homes
  - a. Single family owner-occupied
  - b. Single family rental
  - c. Multi-family dwellings

2. Manufactured Homes
  - a. Owner-occupied
  - b. Renter-occupied

Priority will be given to the weatherization of single-family or other high energy-consuming dwelling units.

#### Rental and Multifamily Building Procedures

References to the specific eligibility of multifamily buildings is addressed in the regulations, 10 CFR 440.22(b)(2). Additional USDOE guidance can be found in USDOE Weatherization Program Notice 16-5.

Rental units may be weatherized when occupied by an eligible client; and

- The Subgrantee has written permission from the owner or his agent. Such written permission shall be permanently maintained in the file of the client whose unit is weatherized.
- The benefits of weatherization assistance will accrue primarily to low-income tenants.
- Not less than 66 percent (50 percent for duplexes and four-unit buildings) of the dwelling units in the building are occupied by eligible clients or will become occupied by eligible clients within 180 days under a Federal, State, or local program for rehabilitating the building or making similar improvements to the building.
- The Subgrantee must obtain and place in the client file a signed agreement from the landlord (or authorized agent of the landlord) that states that for a minimum of 12 months after weatherization work has been completed on a dwelling, the tenants in that dwelling will not be subjected to rent increases because of the increased value of dwelling units due solely to weatherization assistance provided under this part.
- No undue or excessive enhancement shall occur to the value of the dwelling units.
- In the event of a dispute between the tenant and property owner regarding the issues listed above, the Subgrantee will attempt to resolve the dispute; if that fails, the tenant will be referred to legal aid by the Subgrantee.
- In the case of a vacant rental dwelling, weatherization assistance may be provided if there is assurance that a low-income household will inhabit the dwelling within 180 days of the date the weatherization service was completed.
- Subgrantee has provided copies of the signed Landlord Agreements to the tenants and ensure that documentation is placed in the Subgrantee Client File.

The Nebraska WAP does not file liens or enforce restrictions.

Under 10 CFR 440.18(f)(1): No grant funds awarded under this part shall be used for any of the following purposes; To weatherize a dwelling unit which is designated for acquisition or clearance by a Federal, State or local program within 12 months from the date weatherization of the dwelling unit would be scheduled to be completed.

### Multi-family Buildings

The total amount of funds that can be invested in a multi-family project is determined as follows: Multiply the total number of income-eligible units in the multi-family building by the current statewide average cost per unit. The total is the maximum amount of USDOE funding available to weatherize the building. All units in the building can be served and all units should be reported to USDOE. Sub-grantees must submit multi-family projects greater than 24 units to the Department of Environment and Energy for review and approval before work begins and costs are incurred. The Department of Environment and Energy reviews the proposed project and submits to the USDOE Program Office as per the Multi-Family Review Protocol.

### Deferral Process

There are conditions and situations under which a Subgrantee must not or may choose not to weatherize an otherwise eligible dwelling unit. Information for making this determination may become evident during either the eligibility process or during the initial inspection process. The Nebraska WAP Deferral policy is part of the Health & Safety plan found in the Nebraska Weatherization Field Guide and Installation Standards, Section 2 Health & Safety.

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

Children are defined as those individuals under the age of six.

## **V.1.4 Approach to Tribal Organizations**

Low-income members of Indian tribes will receive benefits equivalent to the assistance provided to other low-income persons within Nebraska.

## **V.2 Selection of Areas to be Served**

Current service areas are predominantly based upon the historic boundaries of the state CAP agencies. This was done for two reasons. First, Nebraska Subgrantee CAP agencies in general, operate within boundaries that best serve the clients they serve through multiple assistance programs. Second, this approach enables CAPs to use existing outreach structures to recruit eligible clients. However, the State reserves the right to re-designate weatherization service areas during a program year should production of homes or service to eligible clients become deficient in any given service area for the WAP.

The Department of Environment and Energy reserves the right to operate, on a temporary basis, the Weatherization Program in the territory of any defunded Subgrantee. This will be done to ensure continued service to an area during the search for a new Subgrantee.

### Formula to calculate Subgrantees allocation

Weighted average based on population.

$$0.1 \times \frac{\{\text{Population (C)}\}}{\{\text{Population (S)}\}} + 0.2 \times \frac{\{\text{200\% of Poverty (C)}\}}{\{\text{200\% of Poverty (S)}\}} + 0.3 \times \frac{\{\text{Poverty(C)}\}}{\{\text{Poverty (S)}\}} + 0.4 \times \frac{\{\text{Elderly(C)}\}}{\{\text{Elderly (S)}\}}$$

C = County    S= State

Subgrantees under the WAP were required to notify the NDEE by January 15, 2021 of their interest in continuing as a service provider for the program year beginning July 1 of that year. At the time of submitting Subgrantee letter of intents to provide weatherization service in their specific counties, they will also submit any changes to: Articles of Incorporation, Mission Statement, key agency personnel, Board of Directors and representation, organizational chart, and proposed staffing levels. The application must also address:

- The organization's experience, performance and training in weatherization or housing renovation activities;
- The organization's experience in assisting low income persons in the area to be served; and
- The organization's capacity to undertake a timely and effective weatherization program.

For PY2021 Subgrantees notification of intent will be the written notification to serve the counties they submitted in their most recent Request for Proposal (RFP) for applications. At the time of the submission of the letter of intent, they will also provide any changes that were submitted in the RFP applications that would apply to PY2020.

### **V.3 Priorities for Service Delivery**

Eligible clients will receive weatherization assistance in Nebraska according to the following priorities:

1. Persons over 60 years of age;
2. Persons with disabilities;
3. Families with children under 6 years old;
4. High residential energy users; and
5. Households with a high-energy burden.

Subgrantees must serve clients according to date of application submission, by priority, and by county. As a rule, within an individual county, a lower priority client should never be served prior to a higher priority client unless the higher priority client was not available during the available time period. Subgrantees must document irregularities in the selection of clients when a high priority client is not available.

As defined in 10 CFR 440, the term Persons with Disabilities means any individual (1) who is a handicapped individual as defined in section 7(6) of the Rehabilitation Act of 1973, (2) who is under a disability as defined in section 1614(a)(3)(A) or 223(d)(1) of the Social Security Act or in section 102(7) of the Developmental Disabilities Services and Facilities Construction Act, or (3) who is receiving benefits under chapter 11 or 15 of title 38, U.S.C.

As defined in 10 CFR 440.3, high residential energy user means a low-income household whose residential energy expenditures exceed the median level of residential expenditures for all low-income households in the state.

As defined in 10 CFR 440.3 household with a high-energy burden means a low-income household whose residential energy burden (residential expenditures divided by the annual income of that household times one hundred (100) percent exceeds the median level of energy burden for all low-income households in the state.

### **Prioritization of Single Family Homes and High Energy Users**

Single-family homes remain the primary target of the Nebraska WAP. Subgrantees have been authorized to develop procedures to prioritize client households based on their energy burden.

### **Climatic Conditions**

Total heating degree-days in Nebraska range from a high of 7151 in the northcentral region of the State to a low of 5844 in Southeast region of Nebraska. The average heating degree-days have been supplied by the National Oceanic and Atmospheric Administration. Site-specific weather data is used in application of the NEAT audit. The average heating degree-days for each Subgrantee are set out below:

Blue Valley Community Action Partnership (Lincoln)	6056
Central Nebraska Community Services (O'Neill)	7151
Northeast NE Community Action Partnership (Norfolk)	6643
Community Action Partnership of Lancaster & Saunders Counties (Lincoln)	6056
Community Action Partnership of Mid Nebraska (North Platte)	6686
Northwest Community Action Partnership (Chadron)	6775
Southeast NE Community Action Partnership (Pawnee City)	5844
Habitat for Humanity of Omaha (Omaha)	6506

## **V.4 Types of Weatherization Measures to be Done**

As a result of experience and research in weatherizing several thousand site-built and mobile homes in Nebraska, including substantial use of the National Energy Audit Tool (NEAT) and the Mobile Home Energy Audit (MHEA), weatherization measures are mandated for use by all Subgrantees under contract



with the NDEE to perform weatherization in Nebraska. The primary goal of the weatherization program remains the conservation of energy with emphasis on insulation, furnace replacement, and air sealing.

#### FRAME HOUSING

Health and Safety Measures

General Heat Loss Measures

Envelope Insulation Measures

Baseload Measures

#### MANUFACTURED HOMES

Health and Safety Measures

General Heat Loss Measures

Envelope Insulation Measures

Baseload Measures

### **V.4.1 Technical Guides and Materials**

*In Program Year 2021, the Nebraska WAP network will utilize the 2018 Retrofitting Nebraska: Standard Work Specifications for Single Family Homes and Manufactured Homes along with the Installation Standards for Single Family and Manufactured Homes that were issued to Subgrantees in May of 2018. NDEE informed Subgrantees at that time of the expectations for work quality and adherence to the Field Guide and Installation Standards. NDEE implemented the Nebraska Field Guide and Installation Standards after approval by the Department of Energy in Program Year 2018 and will be in effect for five (5) years as Nebraska's technical guides. The Nebraska Field Guide and Installation Standards manual aligns with the USDOE Standard Work Specifications and are the work quality standards that will meet the technical requirements for the WAP outlined in USDOE WPN 15-4, Section 2 and 10 CFR 440.*

Each Subgrantee, by signing their Financial Aid Agreement with NDEE, agrees they understand the expectations of the Nebraska Field Guide and Installation Standards, USDOE WPN 15-4, energy audit procedures and 10 CFR 440 including Appendix A. By signing this agreement Subgrantees will also be acknowledging that they will include these expectations within their contract agreements.

The approved Nebraska Field Guide and Installation Standards are available on the Department of Environment and Energy Weatherization website for Subgrantees to provide downloadable Installation Standards to crews and contract vendors. For in-network WAP Directors, Managers or Certified Quality Control Inspectors employees the Department of Environment and Energy provides the Field Guides and Installation Standards in pdf and e-pub format for either iPads or Tablet Readers. All contract vendors must provide their own electronic reader to download the Field Guides & Installation Standards.

Subgrantees must provide a mechanism through their contractual agreements verifying that vendors understand and agree to the terms and usage of the Field Guides and Installation Standards and all USDOE installation requirements.

## **V.4.2 Energy Audit Procedures**

### **Approval of Energy Audit Procedures**

On March 31, 2021, NDEE received USDOE conditional approval, effective June 2, 2021, of its audit procedures for site built and for certain small multifamily buildings using the NEAT and for manufactured homes using the MHEA. Both audit tools are already USDOE approved to calculate savings-to-investment (SIR) ratios. NDEE followed the latest WPN 19-4 guidance to comply with 10 CFR 440 for re-approval.

### **Single Family -- National Energy Audit (NEAT)**

The National Energy Audit (NEAT) has been adopted by the Nebraska weatherization program. The U.S. Department of Energy's most recent approved Nebraska's Audit procedures with added User Defined measures was on March 31, 2021. Site-specific audits must be run on all single-family frame homes for all homes weatherized with Nebraska WAP funds.

### **Manufactured Housing - Mobile Home Energy Audit (MHEA)**

Nebraska has chosen to utilize the Manufactured Home Energy Audit (MHEA). Site-specific audits must be completed on all mobile homes weatherized with Nebraska WAP funds. The MHEA Audit was approved with User Defined Measures by USDOE on March 31, 2021.

### **Multi-family Energy Audits**

Multi-family buildings represent less than 20 percent of the housing stock in Nebraska. The U.S. Department of Energy has indicated that they will rely on the MulTEA, EA-QUIP, REM audit software, HEAT, eQUEST and TREAT audits for these larger, multi-family buildings.

When considering weatherization of a multi-family building of greater than 5 units, Subgrantees must consult the NDEE for Energy Audit and technical assistance before performing weatherization work so that required information can be submitted for USDOE review and approval of these types of weatherization projects.

### **Savings to Investment Ratio**

A SIR of 1.0 or greater means that the expected energy savings from installing the measure is equal to or greater than the initial cost of installation.

When an individual Measure SIR is not reached in multi-family (3 units and larger) building owners are allowed to buy-down DOE approved NEAT/MHEA Candidate Measures for Building Envelope and/or Baseload Energy Conservation Measures (ECMs) measures that don't achieve an individual SIR of 1 or greater as a stand-alone measure. However, in order for the measure(s) to qualify for a buy-down, the package of measures, **including the full cost of the Measure, which is to be bought down**, must have a

Cumulative SIR (CSIR) of 1 or greater. **Note: Funding may not be solicited from an income-eligible homeowner. Homeowners may not contribute funds to pay the difference for a measure with an SIR of less than 1.0.**

### **Opting Out or Skipping Cost-effective Weatherization Measures**

Opting out, skipping or “leapfrogging” of Measures that have been determined by the Energy Audit to be cost-effective is not allowed. Completion of all measures with an SIR of 1.0 or greater is required and all energy-savings measures must be considered and ranked in order of descending SIR. **The higher the SIR, the higher the priority.** Higher-ranking measures may not be skipped in order to complete a measure with a lower SIR. In other words, measures may not be skipped and/or clients cannot ‘opt’ out of a measure.

### **V.4.3 Final Inspection – Quality Control**

Each Subgrantee is required to perform a final quality control inspection on the weatherized home completed by a Building Performance Institute, Inc. (BPI) Certified Quality Control Inspector before reporting it to the NDEE as a completed home and requesting reimbursement as required in USDOE Federal Regulations 10 CFR 440.16(g). The Quality Control Inspector must certify that work has been completed in accordance with the priority determined by the energy audit procedures required by 10 CFR 440.21.

In PY2021 Subgrantees will be required to meet USDOE WPN 15-4 Quality Work Plan requirements and to meet Quality Control Inspector (QCI) Certification requirements. In PY2021 QCI work must meet or exceed standards specified in the Nebraska Standard Work Specification Field Guide and Installation Standards. Documentation is required to be kept in each client file as evidence that a final inspection has been performed by a Certified QCI. NDEE Program Monitors review client files as part of the Subgrantee monitoring to ensure compliance with this requirement. When a unit has received a QCI by the Subgrantee agency and has been monitored by a NDEE Field Conservation Technical staff, both QCI inspection forms will be included in the client file or building file.

Subgrantee agencies operating with a combined Energy Auditor and QCI will be involved in a higher quality assurance review by NDEE above ten (10) percent of all completed units. Subgrantees operating with separate Energy Auditors and QCIs will have at least five (5) percent of all completed units reviewed. Subgrantees using one person to perform both the Energy Audit and the QCI are not allowed to utilize that person to perform weatherization work on a dwelling. Subgrantees using one person as Energy Auditor and one person as QCI can allow the Energy Auditor to perform weatherization work on a dwelling, while the QCI is not allowed to perform any weatherization work on a dwelling.

Any Subgrantees utilizing an independent privately contracted QCI will provide documentation of certification of the QCI performing the inspections on completed units and include all QCI inspection forms within the client or building files.

## **V.5 Weatherization Analysis of Effectiveness**

The State of Nebraska is committed to providing the citizens of Nebraska with an effective weatherization program that provides quality and cost-effective services. Annually since 2015 NDEE has completed a study detailing the actual energy savings and cost effectiveness of weatherization work completed in Nebraska. The study uses a pre- and post-consumption analysis of randomly selected homes proportionately selected based on population demographics in each Subgrantee region. The results of that study and its methodology continue to be used to provide program feedback regarding the effectiveness of specific weatherization measures, and to assist in identifying training needs or training effectiveness based on energy savings and reduction of energy burden to low-income households.

During the application process the Subgrantees secure a signed Client Consumption Release Form which authorizes the Subgrantees to obtain the consumption records for each household for a 12-month period prior to weatherization (pre-consumption) and for a 12-month period after weatherization (post-consumption). The 30-year normalized client pre- and post-consumption data, based on fuel type, is used to calculate the percentage of energy consumption savings achieved.

For the period of July 2018 to June 2019, consumption on 99 homes was evaluated and the data showed an average savings for natural gas at 12.06 percent and an average savings for electricity at 6.54 percent. In comparison to the USDOE National Evaluation results:

- 2008 – 18 percent for gas, and 7 percent for electricity average annual energy savings
- 2010 – 16 percent for gas, and 8 percent for electricity average annual energy savings

The PY 2018 State of Nebraska analysis shows the annual energy savings for electricity remains comparable to the National Evaluation results for 2008 and 2010 and the annual energy savings for gas, although lower than the National Evaluation results, it has increased over the results shown for PY 2016 & PY 2017.

Nebraska is in the process of collecting and reviewing data for July 2019 to June 2020 to continue to evaluate the annual energy savings of Subgrantees weatherization work and to work with our state database developers to automate the evaluation program. These activities will continue to assist the Department of Environment and Energy in evaluating program effectiveness as well as help in identifying technical training needs or the effectiveness of training during that period.

#### Other Analysis of Effectiveness

The effectiveness of Subgrantee weatherization is also assessed through program technical monitoring activities and the requirement that all dwelling units weatherized in the program have an energy audit completed to measure energy effectiveness and minimum savings to investment ratio of 1.0 or better.

Inconsistencies noted through program monitoring result in actions that increase training and monitoring requirements in an effort to put a Subgrantee on the path to continued improvement.

This year NDEE intends to work with program Subgrantees to establish and begin implementation of core competency requirements for all program personnel at both the state and Subgrantee level. Trainings will be targeted to provide personnel skills, knowledge and ability to perform weatherization program activities effectively.

NDEE will expand monitoring activities of Subgrantees to include the percentage and types of efficiencies/improvement actions required as a result of on-site inspection activities.

## V.6 Health and Safety Plans

### Weatherization Grantee Health and Safety (H&S) Plan

#### 1.0 – GENERAL INFORMATION

##### Additional information that does not fit neatly in one of the other sections of this document.

The average per dwelling expenditure of financial assistance provided under WAP for labor, weatherization materials, and related matters may not exceed \$7,776 statewide in Program Year 2021 (starting July 1, 2021), as per the U.S. Department of Energy's Weatherization Program Notice 21-1. Historically, Nebraska has not limited H&S investment to a per-unit cost, but it has allocated between 15-20 percent of its annual allocations to cover H&S-related expenditures. In PY2021, a per dwelling unit limit for Health and Safety expenditures of \$1,500 has been established, based on historical data. Units may exceed the \$1,500 limit if approved in advance by the Nebraska Department of Environment and Energy (NDEE) on a case-by-case basis.

Please see the USDOE approved Nebraska Weatherization Field Guide and Installation Standards, Section 2 for Nebraska's WAP Health and Safety plan for Single Family Homes and Manufactured Homes. (Links to be posted on the Nebraska Department of Environment and Energy website. (<https://neo.ne.gov/programs/wx/wx-sws-2018/wx-retrofitting-2019.html#fq2>))

#### 2.0 – BUDGETING

Grantees are encouraged to budget H&S costs as a separate category and, thereby, exclude such costs from the Average Cost Per Unit (ACPU) cost limitation. This separate category also allows these costs to be isolated from energy efficiency costs in program evaluations. H&S costs that 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 Grantee's Department of Energy (DOE)-approved energy audit tool.

##### Select which option used below.

Separate H&S Budget

Contained in Program Operations

#### 3.0 – H&S EXPENDITURE LIMITS

Pursuant to [10 CFR 440.16\(h\)](#), Grantees must establish H&S expenditure limits for their Program and provide justification for those limits by explaining the basis and related historical H&S expenditures. DOE acknowledges that it may be necessary for Grantees to deviate from historical expenditures when certain circumstances arise (e.g. funding source changes).

[10 CFR 440.16\(h\)\(2\)](#) dictates that these limits must be expressed as a percentage of the ACPU. To calculate this percentage use the following formula:

$$\text{Total Average H\&S Cost per Unit} = \frac{\text{H\&S budget amount}}{\text{Program Operations budget amount}}$$

For example, if the ACPU is \$5,000 and a Grantee's Program expends an average of \$750 per dwelling on energy-related H&S measures, the Total Average H&S Cost per Unit would equal 15 percent. DOE acknowledges that this percentage may vary significantly between Grantees due to different geographical areas and depending upon the availability of other funding sources, resource availability, etc. Low percentages should include a statement of what other funding supports H&S costs, while larger percentages will require greater justification and relevant historical support.

15 percent is not a maximum limit on H&S expenditures. DOE will conduct a secondary level of review on H&S Plans with a Grantee request of more than 15 percent of Program Operations used for H&S purposes, . **DOE strongly encourages using the**

**table below in developing justification for the requested H&S budget amount.** In accordance with [10 CFR 440.18\(d\)\(15\)](#), these funds are to be expended by the Program in direct weatherization activities, “of which is necessary before, or because of, installation of weatherization materials.” This same section of the regulation excludes the H&S costs from the ACPU limitation if H&S costs are budgeted separately.

DOE recommends reviewing recent budget requests and compare those to actual H&S 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 annual plan..

**H&S expenditure limits and justification explaining the basis for setting the limits.**

Describe H&S Expenditure Limits and Justification Here

See Matrix Below



Measure Matrix  
Final.xlsx

**4.0 – INCIDENTAL REPAIR MEASURES**

Any measures that could potentially be identified as H&S but the Grantee chooses to instead identify and treat those measures as incidental repair measures (IRMs), must be implemented consistently throughout the Grantee’s weatherization program. The measure must fit the regulatory definition of an IRM and be cost justified along with the associated energy conservation measure and/or package of measures. [10 CFR 440.3](#) defines Incidental Repairs as, “those repairs necessary for the effective performance or preservation of weatherization materials.”

**H&S measures identified and treated as IRMs within your Program.**

NDEE has set cost limits on incidental repair measures that will allow necessary repairs to improve the effectiveness of performance and preservation of weatherization measures. The cost limits associated with incidental repairs are shown below; additional information regarding the specific topics can be seen in the following sections of this Health & Safety plan.

- 7.5 – Biologicals and Unsanitary Conditions - \$300.00  
(odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.)
- 7.6 – Building Structure and Roofing - \$300.00
- 7.9 – Electrical - \$300.00
- 7.14 – Injury Prevention of Occupants and Weatherization Workers \$200.00  
(Measures such as repairing stairs and replacing handrails)
- 7.16 – Mold and Moisture \$300.00  
(Including but not limited to: drainage, gutters, down spouts, extensions, flashing, sump pumps, dehumidifiers, landscape, vapor retarders, moisture barriers, etc.)



- 7.17 – Pests - \$300.00

### **5.0 – OCCUPANT PRE-EXISTING OR POTENTIAL HEALTH CONDITIONS AND HAZARD IDENTIFICATION AND NOTIFICATION FORM(S)**

*Grantees must include policies/procedures for informing clients of the aspects of weatherization that may put a client with pre-existing health conditions at risk during installation of measures. This screening may occur as part of the initial application for weatherization and/or during the energy audit. Procedures must include what steps will be taken and/or available to the client to ensure that weatherization work will not aggravate pre-existing health conditions. Additionally H&S assessments are required to identify hazards in the home. For those hazards identified, appropriate testing is required when applicable. The client/landlord/property manager must be informed in writing of all testing results, including identification of a hazards revealed by the testing that will lead to deferral/referral.*

*Grantees are required to develop documentation forms that include at a minimum:*

- *Occupant Pre-existing or Potential Health Conditions;*
  - *Screen occupant(s) to self-report known or suspected health concerns either as part of initial application for weatherization, during the energy audit, or other parts of the weatherization process as specified;*
  - *Inform client in writing of any known risks; and*
  - *Provide client with Subgrantee point of contact information in writing so client can inform of any issues.*
- *Hazard Identification Notification Form*
  - *The occupant(s) (and Landlord's, if applicable) name and address;*
  - *Date(s) of the energy audit/assessment and when the occupant(s) (and Landlord, if applicable) 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 occupant(s) (and Landlord's, if applicable) signature(s) indicating that they understand and have been informed of their rights and options.*

#### **Procedure for soliciting occupants' health and safety concerns related to components of their homes**

- Prior to any on-site inspection work being scheduled in a home, sub-grantee intake personnel will assist clients in completing a Weatherization Client Questionnaire and a Health & Safety Home Screening Questionnaire as part of the application process.
  - The questionnaires provides information on health concerns and/or issues such as non-working furnaces, foundation issues, leaks, debris, pet/pest issues, broken glazing, etc. in the home that impact not only the client's safety but the safety of weatherization workers.
  - The questionnaires will be included in the client file for future reference.

#### **Procedure for determining whether occupants suffer from health conditions which may be negatively impacted by the act of weatherizing their dwelling**

- If it is determined through the Health & Safety Home Screening Questionnaire that someone in the home is sensitive to a product that may be or is intended to be used during the weatherization process, the sensitivity must be documented in the file and, if possible, an alternative product may be used. If no successful alternative is found, the weatherization of the home may proceed without completion of the measure with no impact on weatherization measures with lower SIRs, with prior Nebraska Department of Environment and Energy approval.

#### **Procedure for addressing potential health concerns including pre-existing health conditions when they are identified**

- When a client's health is fragile and/or the weatherization activities would constitute a health or safety hazard, the occupants at risk will be required to leave the home during the activities and requested to return at least 1 hour (or a reasonable time as determined by the installers) after installers are scheduled to leave to allow for clean-up and appropriate ventilation of the home.

- Weatherization funds cannot be used to relocate clients or reimburse them for such costs incurred as a result of the requirement to leave during the day. If the client is unable to leave the home and the intended work may exacerbate an occupant’s health condition, the home may need to be deferred.
- Sub-grantees must take all reasonable precautions against performing work on homes that would subject clients to Health & Safety risks.

**Documentation Form(s) have been included for review?**

Yes  No

**Location where forms have been uploaded/submitted**

Separate attachment to SF424  Separate attachment to H&S Plan

## 6.0 – HEALTH AND SAFETY CATEGORIES

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

- Explain whether you concur with existing guidance from Weatherization Program Notice (WPN) 17-7 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 require comprehensive explanations as to how it meets the intent of DOE guidance.
- Where an action/allowability or testing is “required” or “not allowed” through WPN 17-7, Grantees must concur, or choose to defer all units where the specific category is encountered.
- Any activities that are marked as deferral/referrals must contain the H&S reasons specified within the Master File Section V.1.2 Box 5 Deferral/Referral.
- Unless an alternate funding source(s) is declared, utilize DOE funds to address the particular category.
- Describe the explicit methods to address the specific category.
- Describe in detail what testing protocols (if any) used to assess the particular category.
- Define and quantify minimum thresholds that determine minor, major, and limited definitions and the criteria used to make a determination on a case-by-case basis.
- Define “at-risk” occupant(s) and identify minimum documentation requirements for them.
- Client Education activities specific to H&S reasons is required within the Master File Section V.8.4 Training and Technical Assistance of the annual application.
- Training activities specific to H&S reasons is required within the Master File Section V.8.4 Training and Technical Assistance of the annual application.

## 6.1 – Air Conditioning and Heating Systems

**Concurrence, Alternative or Deferral**

Concurrence with DOE Guidance  Alternative Guidance  Results in Deferral/Referral

Air Conditioning Unallowable with DOE Funds  Heating Unallowable with DOE Funds

Other Funding Source Addresses H&S Issue  Enter Funding Source

**Procedure for unsafe or non-functioning primary heating/cooling systems**



- Red tagged” and/or inoperable *heating system* replacement, repair, or installation **is** an allowable Health & Safety Cost.
- Repair of air conditioning systems **is** an allowable Health & Safety Cost. Replacement or installation of air conditioning systems **is not** an allowable Health & Safety Cost.
  - A maximum \$500 may be spent to repair heat pumps and central air conditioning systems.
  - In renter occupied homes, if the cost to repair the furnace, central air conditioner or heat pump exceeds \$500, the owner may repair or replace the unit. However, if the furnace, central air conditioner or heat pump is replaced in accordance with the requirements of this Field Guide and Installation Standards, the *Nebraska Weatherization Assistance Program* (NeWAP) may contribute a maximum of \$500 to the replacement cost.
- Unsafe primary units must be repaired, replaced and removed, or rendered inoperable, or deferral is required.

#### **Procedure for unsafe or non-functioning secondary heating systems, including unvented secondary space heaters**

- Replacement or installation of secondary units is not allowed.
- Secondary unvented units that conform to the safety standards on ANSI Z21.11.2 may remain as back-up heat sources.
- Units that do not meet ANSI Z21.11.2 **must** be removed, and properly disposed of, prior to weatherization but may remain until a replacement *heating system* is in place.
- Secondary unvented units that conform to the safety standards on ANSI Z21.11.2, but are not operating safely, must be removed and properly disposed of.
- Repair of secondary unvented units is not allowed.
- An unvented gas-liquid-fueled space heater that remains in a completed single-family house after weatherization shall:
  - Not have an input rating in excess of 40,000 Btu/hour;
  - Not be located in, or obtain combustion air from sleeping rooms, bathrooms, toilet rooms, or storage closets, except:
    - One listed wall-mounted space heater in a bathroom if permitted by the authority having jurisdiction which:
      - has an input rating that does not exceed 6,000 Btu/hour;
      - Is equipped with an oxygen-depletion sensing safety shut-off system; and
      - The bathroom has adequate combustion air;
    - One listed wall-mounted space heater in a bedroom if permitted by the authority having jurisdiction which:
      - has an input rating that does not exceed 10,000 Btu/hour;
      - Is equipped with an oxygen-depletion sensing safety shut-off system; and
      - The bathroom has adequate combustion air.

#### **Definition of and documentation required for “at-risk” occupants**

- The State of Nebraska’s annual heating degree day normal, over the fifty-year period from 1970-2020 is 6322, with January average °F high and low temperatures of 35 to 12. Clients in units that contain *heating plants* that are inoperable or red-tagged are in danger of frost bite, hypothermia and other life-threatening issues. Therefore, units that contain heating plants that are inoperable or red-tagged at the time of the initial inspection must have the heating plant addressed.
- The replacement or installation of air conditioning is not a Health & Safety measure, therefore no at-risk definition is applicable.

#### **Testing protocols**

- Verify that systems are present, operable, and performing correctly.
- Run DOE-approved energy audit to determine if the system can be installed as an energy conservation measure (ECM) prior to replacement as an H&S measure.
- For 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.

## **6.2 – Asbestos (Confirmed and/or Presumed Asbestos Containing Material)**

**Concurrence, Alternative or Deferral**

Concurrence with DOE Guidance  Alternative Guidance  Results in Deferral/Referral   
Unallowable Measure with DOE Funding  Other Funding Source Addresses H&S Issue  Enter Funding Source

**Asbestos on Heating, Ventilation and Air Conditioning (HVAC) systems, distribution, venting and other small surfaces that will be disturbed through the course of weatherization work policy**

- An appropriately trained crew leader, auditor or inspector shall complete an initial visual inspection of all surfaces and subsurfaces, piping, and equipment for suspected ACM.
- Assume asbestos is present in suspect covering materials.
- In homes where *friable* suspected ACM, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present:
  - o The sub-grantee **must** take precautionary measures as if it contains asbestos, such as utilizing personal air monitoring.
  - o Blower door testing **must not** be completed.
  - o The costs associated with asbestos testing, abatement or encapsulation **not** eligible expenditures in the *Nebraska Weatherization Assistance Program*.
- In homes with asbestos, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present, encapsulated and in good condition:
  - o Weatherization work may continue.
  - o Blower door testing, using either negative or positive pressure techniques, **must** be completed.

**Asbestos in attics, walls, floors roofs and foundations that will be disturbed through the course of weatherization work policy**

- In homes where *friable* suspected ACM siding, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present:
  - o The sub-grantee **must** take precautionary measures as if it contains asbestos, such as utilizing personal air monitoring.
  - o Wall insulation measure work must be completed from the interior of the home.
  - o The costs associated with asbestos testing, abatement or replacement with new siding are **not** eligible expenditures in the *Nebraska Weatherization Assistance Program*.
- In homes with asbestos siding, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present and in good condition:
  - o Installing dense-pack insulation from the exterior is allowed.
- Removal of siding is allowed to perform energy conservation measures; however precautions **must** be taken not to damage the siding. Asbestos siding should never be cut, sanded or drilled. Where possible, insulate the exterior walls through the interior of the home.
- The costs associated with asbestos testing are **not** eligible expenditures in the *Nebraska Weatherization Assistance Program*.

**Vermiculite that will be disturbed through the course of weatherization work policy**

- Visual inspections of all surfaces and subsurfaces, piping, and equipment for suspected ACM.
- Assume asbestos is present in suspect covering materials.
- In homes where *friable* suspected ACM, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present:
  - o The sub-grantee **must** take precautionary measures as if it contains asbestos, such as utilizing personal air monitoring.
  - o The costs associated with asbestos testing, abatement or encapsulation **not** eligible expenditures in the *Nebraska Weatherization Assistance Program*.
- In homes with asbestos, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present, encapsulated and in good condition:
  - o Weatherization work may continue.

### Blower door testing policy when asbestos/vermiculite is present

#### In Siding, walls, ceilings, etc.

- In homes where **friable** suspected ACM siding, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present, blower door testing, using positive pressure techniques, must be completed.
- In homes with asbestos siding, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present and **in good condition**, blower door testing, using either negative or positive pressure techniques, must be completed.

#### In vermiculite

- If the presence of asbestos has been previously confirmed or if the sub-grantee believes that vermiculite insulation is present, when blower door tests are performed, it must be performed using pressurization instead of depressurization.

#### On pipes, furnaces, or other small covered surfaces

- In homes where **friable** suspected ACM, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present, blower door testing must not be completed.
- In homes with asbestos, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present, encapsulated and **in good condition**, blower door testing, using either negative or positive pressure techniques, must be completed.

#### Testing protocols

- Visual inspections of all surfaces and subsurfaces, piping, and equipment for suspected ACM.
- AHERA sample testing must be conducted by a certified tester; however, sampling, testing, encapsulation and remediation costs are **not** eligible expenditures in the *Nebraska Weatherization Assistance Program*.
- Cost incurred by sub-grantees to comply with asbestos training requirements may be charged to the Health & Safety budget category.

#### Documentation requirements

- Documentation regarding the presence of asbestos material by an appropriately trained crew leader, auditor or inspector or testing **must** be maintained in the client file.
- Any testing results used to support the installation of ECM associated with the exterior walls of the homes or when deferral is necessary due to asbestos, the home owner/occupant must provide remediation documentation indicating the remediation was completed by an Asbestos Hazard Emergency Response Act of 1986 (AHERA) certified professional, prior to weatherization. A copy of the documentation must be included in the client file.

## 6.3 – Biologicals and Unsanitary Conditions

(e.g., odors, mustiness, bacteria, viruses, raw sewage, rotting wood)

#### Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance  Alternative Guidance  Results in Deferral/Referral   
Unallowable Measure with DOE Funding  Other Funding Source Addresses H&S Issue  Enter Funding Source

#### Biological and unsanitary conditions in dwellings policy

- Remediation of **minor** conditions that may lead to or promote biological concerns and unsanitary conditions is allowed. Subgrantees are limited to a maximum cost of \$300 to remediate these **minor** conditions, although approval to exceed this limitation will be reviewed on a case by case basis by the Nebraska Department of Environment and Energy **prior** to any work being implemented.
- Addressing bacteria, viruses or major biological and/or unsanitary conditions **is not** an allowable reimbursable cost.
- Deferral may be necessary in cases where conditions in the home pose a health risk to occupants and/or weatherization workers.

#### Testing protocols

- Sensory and visual inspection.

## 6.4 – Building Structure and Roofing (e.g., roofing, wall, foundation)

### Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance  Alternative Guidance  Results in Deferral/Referral

Unallowable Measure with DOE Funding  Other Funding Source Addresses H&S Issue  Enter Funding Source

### Structural issues in dwellings policy

- Building rehabilitation is beyond the scope of the *Nebraska Weatherization Assistance Program*.

### Define and quantify minor or allowable structure and roofing issues. At what point are these considered beyond the scope of weatherization?

- Subgrantees are limited to a maximum cost of \$300 to implement *minor* repairs when necessary to effectively weatherize the home. Approval to exceed this limitation will be reviewed on a case by case basis by the Nebraska Department of Environment and Energy *prior* to any work being implement.

### If priority lists are used and these repairs are designated as IRMs, at what point is a site-specific electronic energy audit required?

- Priority Lists are not used.

## 6.5 – Code Compliance

### Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance  Alternative Guidance  Results in Deferral/Referral

Unallowable Measure with DOE Funding  Other Funding Source Addresses H&S Issue  Enter Funding Source

### Code compliance issues in dwellings policy

- Correction of preexisting code compliance issues is not an allowable unless triggered by weatherization measures being installed in a specific room or area of the home.
  - Examples of eligible costs associated with cost-effective Weatherization Measures include, but are not limited to: the installation of fans to provide appropriate ventilation in the home, appropriate disconnect switching and clearance requirements on furnace installations, installation of appropriately sized chimney liner when water heaters are orphaned by a high efficiency furnace installation, etc. Costs associated with the purchase of any required permits are eligible
- It is each sub-grantee’s responsibility to ensure that weatherization-related work conforms with the applicable codes in the jurisdiction where the work is being performed.
- Follow State and local codes while installing weatherization measures, including H&S measures.
- Condemned properties and properties where “red tagged” H&S conditions exist that cannot be corrected under this guidance must be deferred.
- The cost of the permits **must not** be passed onto the client.
- When correction of preexisting code compliance issues is triggered and paid for with WAP funds, specific code requirements with reference to the weatherization measure(s) that triggered the code compliance issue **must** be included in the client file.

## 6.6 – Combustion Gases

### Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance  Alternative Guidance  Results in Deferral/Referral

Unallowable Measure with DOE Funding  Other Funding Source Addresses H&S Issue  Enter Funding Source

### Combustion gas issues discovered during testing, including those that require an immediate response policy

- Auditors, Crew leaders and crews are directed to contact their weatherization coordinator or supervisor immediately if during their time on-site:
  - o The *heating plant* or other combustion appliance is malfunctioning.
  - o Household members exhibit symptoms that could be from carbon monoxide poisoning. Open windows or evacuate the house if necessary.
  - o There is a strong odor of heating gas or sewer gas. Open windows or evacuate the house if necessary.
  - o Existing conditions have changed in ways that would make proposed work difficult, dangerous or no longer cost-effective.

**Testing protocols**

- Combustion safety testing is required when combustion appliances are present.
- Test naturally drafting appliances for spillage and CO during CAZ depressurization pre- and post-weatherization and before leaving the home on any day when work has been done that could affect draft (e.g. tightening the home, adding exhaust) Include copies of all required CAZ Depressurization Test (WX9) and Daily Safety Test Out (WX10) testing WX forms in client file requirement.
- Inspect venting of combustion appliances and confirm adequate clearances.
- Run DOE-approved energy audit to determine if the appliance can be justified as an ECM prior to replacement as an H&S measure.

**6.7 – Electrical**

**Concurrence, Alternative or Deferral/Referral**

Concurrence with DOE Guidance       Alternative Guidance       Results in Deferral/Referral   
 Unallowable Measure with DOE Funding  Other Funding Source Addresses H&S Issue  Enter Funding Source

**Electrical hazards, including knob & tube wiring, in dwellings policy**

**Knob-and-Tube Wiring in Attics:**

- The Nebraska State Electrical Board does not permit directly covering knob and tube wiring with insulation.
- In attics where knob-and-tube wiring has been previously covered and it has been determined to be cost-effective to install additional insulation, the insulation work **must** be completed:
  - o when it has been determined where the wiring is located,
  - o following a determination that it is actually still “active”, and
  - o after the wiring has been appropriately covered to prevent direct contact with the insulation and to provide adequate air space (a minimum of 3 ½” clearance) for “cooling” of the wire.
- Appropriate shielding materials for concealing the knob-and-tube wiring **must** include gypsum board (5/8” or thicker), plywood or oriented strand board.
- Once the determination of the wire locations is documented in the client file, the wiring **must** be appropriately shielded to prevent direct contact with the additional insulation and to provide adequate air movement space for cooling of the wire, then insulated.
- In attic areas where knob-and-tube wiring penetrates the plane of the attic and extends up into a side or *knee wall*, a fire resistant baffling **must** be installed around the wire to provide sufficient space for air movement around the wire to provide adequate air space to accommodate the cooling of the wire, then insulated.

**Knob-and-Tube Wiring in Sidewalls:**

- Knob and tube wiring in sidewalls **must not** be covered by new insulation.
- If knob and tube wiring in walls is covered by existing insulation, additional insulation **must not** be installed.

**Overloaded Electrical, Fuses and Splices:**

- Serious electrical hazards exist when gross overloads such as over usage, overloaded outlets and/or oversized fuses are present. Should auditors and crews find such existing problems, they should notify the owner and note the problem in the client file. Weatherization measures that involve the installation of new equipment such as air conditioners, heat pumps or electric water heaters can exacerbate previously marginal overload problems to hazardous levels. Rewiring of a home is outside the scope of the weatherization program.
- Wiring splices **must** be enclosed in metal or plastic electrical boxes, fitted with cover plates. Electrical boxes in attics **must** be marked with a flag that is visible above the insulation. *Type-S-Fuses* **must** be sized according to the smallest gauge of wire in the circuit to be protected. The following gauge wire requires the following size fuse:

<u>Wire Gauge</u>	<u>Fuse Size</u>
12 gauge wire	20 amp fuse
14 gauge wire	15 amp fuse

- If no insulation is being installed in a home the existing fuses **must** remain intact. In homes that utilize fuses where attic insulation is being installed the State Electrical Board recommends the use of a licensed electrician for the installation of safety *Type-S-Fuses* as indicated in the National Electrical Code.
- When the H&S of the occupant/worker(s) is at risk, minor repairs may be completed as necessary to allow for the implementation of weatherization measures.
- Evaluate and if necessary, provide sufficient over-current protection and damming (if required) prior to insulating building components containing knob and tube wiring, as required by the authority having jurisdiction.

**Define and quantify minor electrical issues. At what point are these considered beyond the scope of weatherization?**

- Subgrantees are limited to a maximum cost of \$300 to implement these **minor** repairs, although approval to exceed this limitation will be reviewed on a case by case basis by the Nebraska Department of Environment and Energy **prior** to any work being implemented.

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

- Priority Lists are not used.



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

### Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance       Alternative Guidance       Results in Deferral/Referral   
 Unallowable Measure with DOE Funding  Other Funding Source Addresses H&S Issue  Enter Funding Source

### Formaldehyde, VOCs, flammable liquids and other air pollutants in dwellings policy

- Removal of pollutants is allowed and required if they pose a risk to workers.
- If pollutants pose a risk to workers and removal cannot be performed or is not allowed by the client the unit *must* be deferred.
- Refer to Hazardous Material Disposal section for more information.

### Testing protocols

- Sensory and visual inspection.

## 6.9 – Fuel Leaks *(please indicate specific fuel type if policy differs by type)*

### Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance       Alternative Guidance       Results in Deferral/Referral   
 Unallowable Measure

### Fuel leak remediation protocols

- Notify utility and temporarily halt work when leaks are discovered that are the responsibility of the utility to address.

### At what point are fuel leaks considered beyond the scope of weatherization?

- Fuel leaks found on the property, but after (or behind) the meter must be repaired before weatherizing a unit.
- When a minor gas leak is found on the property, but before (or in front) of the meter, the utility service must be contacted before work can proceed.

### Testing protocols

- Test exposed gas lines from utility coupling into and throughout the home
- Conduct sensory inspection on bulk fuels to determine if leak exists.

## 6.10 – Gas Range/Ovens

### Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance       Alternative Guidance       Results in Deferral/Referral   
 Unallowable Measure with DOE Funding  Other Funding Source Addresses H&S Issue  Enter Funding Source

### Unsafe gas range/ovens policy

- Maintenance on or repair gas cooktops and stoves is not allowed.
- Replacement is not allowed.

### Testing protocols

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

## 6.11 – Hazardous Materials Disposal [e.g., Lead, Refrigerant, Asbestos, Mercury (including CFLs/fluorescents), etc.] *(please indicate where policy differs by material)*

### Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance       Alternative Guidance       Results in Deferral/Referral   
 Unallowable Measure with DOE Funding  Other Funding Source Addresses H&S Issue  Enter Funding Source

### Hazardous materials disposal policy (existing material/appliance and hazardous material)

- Hazardous materials generated in the course of weatherization work shall be disposed of in accordance to local laws, regulations and/or federal guidelines as applicable.

### Documentation requirements

- Documentation in the client file contract information regarding the party responsible for appropriate disposal.
- In the case of Lead, 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 containment set up. Include the location of photos if it is not referenced in the file.

## 6.12 – Injury Prevention of Occupants and Weatherization Workers (e.g., repairing stairs and replacing handrails)

### Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance  Alternative Guidance  Results in Deferral/Referral   
Unallowable Measure with DOE Funding  Other Funding Source Addresses H&S Issue  Enter Funding Source

### Injury prevention measure(s) policy

- When necessary to effectively weatherize the home, workers may make *minor* repairs and installations to allow for the implementation of weatherization measures.

**Define and quantify minor or allowable injury prevention measures. At what point are these considered beyond the scope of weatherization?**

- Subgrantees are limited to a maximum cost of \$200 to implement *minor* repairs, although approval to exceed this limitation will be reviewed on a case by case basis by the Nebraska Department of Environment and Energy *prior* to any work being implemented.

## 6.13 – Lead Based Paint

### Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance  Alternative Guidance  Results in Deferral/Referral   
Unallowable Measure with DOE Funding  Other Funding Source Addresses H&S Issue  Enter Funding Source

### Lead safe work protocols

- Crews *must* follow EPA's Lead; Renovation, Repair and Painting Program (RPP) when working in pre-1978 housing unless testing confirms the work area to be lead free.
- Deferral is required when the extent and condition of the lead-based paint in the house would potentially create further H&S hazards, the sub-grantee will inform the client of the of the issues associated with a deferral in the Weatherization Deferral Notice (Form WX4) completed by the Weatherization Representative and signed by the client or building owner.
- Only those costs directly associated with the testing and lead safe practices for surfaces directly disturbed during weatherization activities are allowable.

### Testing protocols

- Testing to determine the presence of lead in paint that will be disturbed by WAP measure installation is allowed with EPA-approved testing methods.
- Testing methods must be economically feasible and justified.
- Job site set up and cleaning verification by a Certified Renovator is required.
- Grantees must verify that crews are using lead safe work practices during monitoring.

### 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 containment set up. Include the location of photos if it is not referenced in the file.



## 6.14 – Mold and Moisture

(e.g., drainage, gutters, down spouts, extensions, flashing, sump pumps, dehumidifiers, landscape, vapor retarders, moisture barriers)

### Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance  Alternative Guidance  Results in Deferral/Referral   
Unallowable Measure  Other Funding Source Addresses H&S Issue  Enter Funding Source

- Sub-grantees **must** ensure that weatherization work is performed in a manner that does not cause or contribute to mold problems, and when the work is performed properly, may alleviate mold conditions.
- Where severe Mold and Moistures cannot be addressed, deferral is required.
- Mold cleanup is not an allowed H&S cost.
- Surface preparation where weatherization measures are being installed (e.g., cleaning mold off window trim in order to apply caulk) must be charged as part of the ECM, not to the H&S budget category.
- All clothes dryers and exhaust fans **must** be vented to the exterior.
- The NeWAP requires a full ground laid moisture barrier **must** be installed whenever possible in accessible *crawl spaces* and under manufactured and modular homes *except* when one exists, or the space has a concrete floor.
  - The moisture barrier **must** be a Class I *vapor retarder*, a minimum of 6 mils thick, extended up the walls and the support columns at least 12 inches and the joints **must** overlap a minimum of 12 inches.
  - When installing insulated skirting without adequate clearance to install a full ground laid moisture barrier, the moisture barrier **must** extend a minimum of 24 inches beyond the insulation.
- **Limited** water damage repairs and **Minor** source control work that can be addresses by weatherization workers and are allowed when necessary in order to weatherize the home and to ensure the long-term stability and durability of the measures

### Define and quantify minor or allowable moisture-related measures. At what point are these considered beyond the scope of weatherization?

- Subgrantees are limited to a maximum cost of \$300 to implement **limited** repairs, although approval to exceed this limitation will be reviewed on a case by case basis by the Nebraska Department of Environment and Energy **prior** to any work being implemented.
- Subgrantees are limited to a maximum cost of \$300 to implement this **minor** source control (i.e. correction of moisture and mold creating conditions) independent of latent damage and related repairs. Approval to exceed this limitation will be reviewed on a case by case basis by the Nebraska Department of Environment and Energy **prior** to any work being implemented.

## 6.15 – Pests

### Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance  Alternative Guidance  Results in Deferral/Referral   
Unallowable Measure with DOE Funding  Other Funding Source Addresses H&S Issue  Enter Funding Source

### Pests and pest intrusion prevention policy

- Pest removal is allowed only where infestation would prevent weatherization. Subgrantees are limited to a maximum cost of \$300 for pest removal, although approval to exceed this limitation will be reviewed on a case by case basis by the Nebraska Department of Environment and Energy **prior** to any work being implemented.
- Infestation of pests may be cause for deferral where it cannot be reasonably removed or poses H&S concern for workers.
- Screening of windows and points of access and incorporating pest exclusion into air sealing practices to prevent intrusion is allowed.

### Define and quantify pest infestation thresholds. At what point are these considered Beyond the scope of weatherization

- Pest removal issues that would exceed the maximum cost of \$300 to remedy must be deferred and information must be provided to the client in writing describing conditions that must be addressed in order for weatherization to commence.

## 6.16 – Radon

### Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance  Alternative Guidance  Results in Deferral/Referral   
Unallowable Measure with DOE Funding  Other Funding Source Addresses H&S Issue  Enter Funding Source

### Procedure for radon in dwellings

- The following radon precautions will be implemented in **all** weatherized homes to reduce the possibility of exacerbating any potential radon issues:
  - Whenever site conditions permit, cover exposed dirt floors within the pressure/thermal boundary with 6 mil (or greater) polyethylene sheeting, lapped at least 12” and sealed with appropriate sealants at all seams, walls and penetrations.
  - Air seal existing sumps in such a way that water can drain from above and below the sump cover.
  - Seal and caulk visible, accessible penetrations, openings or cracks in below-grade walls and floors that contact the ground with a sealant that meets the requirements of ASTM C920.
  - Other precautions may include, but are not limited to, sealing any observed floor and/or foundations penetrations isolating the basement from the conditioned space, and ensuring crawlspace venting is installed.
- The following additional radon precautions will be implemented in **all** weatherized homes equipped with active radon mitigation systems:
  - Verify that the radon vent fan is operating.
  - If a previously installed radon mitigation system is not operating correctly advise the client to consult the system installer of the state radon office.
- Radon mitigation is not an allowable H&S cost.

### Testing protocols

- Radon testing is not an allowable cost.

### Documentation requirements

- Provide all clients EPA’s *A Citizen’s Guide to Radon* and inform them of radon related risks.
- Provide all clients the radon informed consent/consent to perform work form (Wx6) signed. A copy of the signed form must be included in the client file prior to receiving weatherization services.

## 6.17 – Safety Devices: Smoke and Carbon Monoxide Alarms, Fire Extinguishers

### Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance  Alternative Guidance  Results in Deferral/Referral   
Unallowable Measure with DOE Funding  Other Funding Source Addresses H&S Issue  Enter Funding Source

### Installation or replacement policy for the following safety devices:

#### Smoke Alarms:

- Battery Operated smoke alarms may be installed where alarms are not present or are inoperable
- Installation of Smoke Alarms and Carbon Monoxide Detectors, as per manufacturer’s instructions, is required on initial inspection of the home. Battery operated or plug-in 110 Volt Detectors, located one per sleeping level and one adjacent to a combustion appliance, are eligible for reimbursement.

#### Carbon Monoxide Alarms:

- CO detectors **must be installed where** detectors are not present or are inoperable.
- Replacement of operable CO Detectors is **not** an allowable cost.
- Installation of Smoke Alarms and Carbon Monoxide Detectors, as per manufacturer’s instructions, is required on initial inspection of the home. Battery operated or plug-in 110 Volt Detectors, located one per sleeping level and one adjacent to a combustion appliance, are eligible for reimbursement.

#### Propane Gas Detectors:

- Must be installed in homes and manufactured housing on permanent foundations that have propane combustion appliances. The gas detectors **must** be permanently installed according to the manufacturer’s instructions and 110 volts.

Fire Extinguishers:

- The costs associated with providing fire extinguishers are **not** allowable Health & Safety Costs.

**Testing protocols**

- Check existing smoke alarms for operation.
- Check for operation of existing CO detectors.
- Verify operation of installed alarms.

**6.18 – Ventilation and Indoor Air Quality**

**Concurrence, Alternative or Deferral/Referral**

Concurrence with DOE Guidance  Alternative Guidance  Results in Deferral/Referral

**Version of American Society of Heating Refrigeration and Air-conditioning Engineers (ASHRAE) 62.2 Implemented (optional: identify Addenda used)**

- NDEE requires ventilation be installed to meet latest DOE approved ASHRAE 62.2.

**Procedures for complying with implemented ASHRAE standard**

- Subgrantees are required to complete pre- and post-weatherization ASHRAE 62.2 evaluations (Redcalc) to ensure that the home meets the Standard for Acceptable Indoor Air Quality and include both evaluations in the client file.
- If the ASHRAE normative Appendix A is employed and an existing fan is being replaced or upgraded to meet whole-house ventilation requirements, take actions to prevent zonal pressure differences greater than 3 pascals across the closed door, if one exists.
- Exhaust fans **must** be vented to the outdoors, and never into building attics or *crawl spaces*. They should have tight-fitting *backdraft dampers*.
- The installation of low sone (1.0) fans is encouraged so the client will run the fan longer.

**Testing protocols**

- Measure the fan flow of existing fans and of installed equipment to verify performance.
- Complete ASHRAE 62.2 evaluations, as discussed above, to determine required ventilation and fan flow requirements.

**6.19 – Window Repair, Door Repair**

**Concurrence, Alternative or Deferral/Referral**

Concurrence with DOE Guidance  Alternative Guidance  Results in Deferral/Referral

Unallowable Measure with DOE Funding  Other Funding Source Addresses H&S Issue  Enter Funding Source

**Window repair and door repair H&S policy**

- Replacement, repair, or installation of Windows and Doors is not an allowable Health & Safety measures through the NeWAP.

**6.20 – Worker Safety (e.g., OSHA)**

**Concurrence, Alternative or Deferral/Referral**

Concurrence with DOE Guidance  Alternative Guidance  Results in Deferral/Referral

Unallowable Measure with DOE Funding  Other Funding Source Addresses H&S Issue  Enter Funding Source

**Federal, state and local worker safety requirements policy**

- Subgrantee crews and contractors must comply with Occupational Safety and Health Administration (OSHA) standards and Material Safety Data Sheets (MSDS) and take precautions to ensure the health & safety of themselves and other workers, including the use of personal protection equipment.
- Costs incurred by subgrantees to comply with OSHA requirements may be charged to the Health & Safety budget category.
- OSHA standards including, but not limited to:
  - respirator protection,
  - techniques for safely lifting heavy objects,
  - electrical equipment safety,
  - ladder safety, and
  - general worker protection.

### 6.20.1 – Infectious Disease Preparedness and Response

#### Concurrence, Alternative, or Deferral

Concurrence with DOE Guidance  Alternative Guidance  Results in Deferral/Referral

Unallowable Measure with DOE Funding  Other Funding Source Addresses H&S Issue  Enter Funding Source

#### Procedure for soliciting occupants' health and safety concerns associated with Infectious Diseases when state and local health department Directed Health Measures (DHM) are issued

- Prior to sending workers to a home Subgrantees are required to complete a supplementary screening, in addition to the Home Health and Safety Screening Questionnaire referenced in Section 5.0 to provide additional information regarding suspected health concerns associated with other infectious diseases. The health and safety of local crew and contractors depends on this type of screening during any other infectious disease outbreak, and clients who are not feeling well or who have contracted a virus can be put on a deferred waitlist. Screening should be complete via telephone (instead of traveling to any client dwelling) during in the application process and again within 24 hours prior to beginning any on-site work. Screening questions should include, but not be limited to:
  - Has anyone in the household tested positive or are presumed positive for COVID-19 or other infectious disease? If so, have they met the CDC criteria to be around others per the section "When it's safe to be around others: ending home isolation?"
  - Has anyone in your household experienced fever, cough or shortness of breath in the last two weeks?
  - Has anyone in your household been in contact with someone who has had a fever, cough or shortness of breath in the last two weeks?
  - Does anyone in the household have underlying medical conditions or are they in frequent contact with someone who has underlying medical conditions?
  -

#### Procedures for Subgrantee weatherization staff associated with Infectious Diseases when state and local health department Directed Health Measures (DHM) are issued

- Allow and encourage appropriate physical distancing and avoid groups of people as allowed in state and local Health Department Directed Health Measures (DHM)
- Encourage staff participation in virtual training conferences, meetings etc.
- Minimize non-essential travel and adhere to CDC guidelines regarding isolation following travel.
- Require sick employees to stay home.
- Do not attend onsite training and/or meetings and conferences sooner than allowed per state and local Health Department Directed Health Measures (DHM)
- Collect applications remotely, if possible, and in instances where remote applications are not plausible, identify and implement strict distancing protocols.
- Complete program intake and eligibility determination, including client signing application verifying accuracy of information utilizing all efforts to minimize client exposure and maximize client services.

- Place eligible vulnerable clients on a waitlist, giving them priority once the state or local jurisdiction is implementing standard weatherization services. All vulnerable individuals should continue to shelter in place throughout the outbreak, these individuals are defined as:
  - Elderly individuals.
  - Individuals with serious underlying health conditions, including high blood pressure, chronic lung disease, diabetes, obesity, asthma, and those whose immune system is compromised such as by chemotherapy for cancer and other conditions requiring such therapy.

**Procedure for Subgrantees during the implementation weatherization measures when working in homes during a low-risk state and local health department Directed Health Measures (DHM)**

- Sub-Grantee and Grantee weatherization staff must follow with the EPA’s Guidance for Cleaning and Disinfecting Public Spaces, Workplaces, Businesses, Schools, and Homes.
- Sub-grantees must implement the following Infectious Disease Preparedness and Response policies and procedures for all crew and contractor on-site work completed during a disease outbreak:
  - Mandate all field workers to use appropriate Personal Protective Equipment (PPE) as per the required training referenced below including removal, and cleaning to avoid contamination (and cross-contamination).
  - Provide the necessary supplies to maintain clean surfaces in client homes both before and after they are performing work.
  - Limit off site trips during the delivery of weatherization services.
  - Provide all vehicles and crew members with hand sanitizer containing at least 60% alcohol.
  - Prioritize the completion of all exterior work prior to addressing the interior work in the client home.
  - Practice social distancing.
  - Minimize the number of crew and clients simultaneously in the home at the time of interior work.
  - During interior work asks clients if they can leave the home, isolate themselves into one room or install a physical barrier (i.e. clear sheet of plastic, or zip wall) while work is being conducted.
  - Offer face masks to clients to contain respiratory secretions.
  - Limit contact by allowing one driver per vehicle per day and disinfect the vehicle before and after use.
  - If the installer determines that a client is exhibiting respiratory illness, they should contact the Agency Weatherization Director or Executive Director to inform them of the concern and allow the client to be moved to a waitlist for an appropriate time period to ensure worker safety.

## **V.7 Program Management**

### **V.7.1 Overview and Organization**

The weatherization program is administered by NDEE, a code agency of the State of Nebraska Executive Branch. The Department of Environment and Energy is the Grantee agency for the state of Nebraska for USDOE Formula Grant funding and is a Subawardee of the Nebraska Department of Health & Human Services on USDHHS LIHEAP funding for the weatherization assistance portion of that state funding. The Department of Environment and Energy is the administrator of these two funds that are passed-through to seven (7) Community Action Agencies and one (1) non-profit agency in Nebraska. The seven (7) Community Action Agencies and one (1) non-profit agency accept applications, prioritize clients based on priority level and perform the weatherization work on dwellings.

### **V.7.2 Administrative Expenditure Limits**

10 CFR §440.18(e) permits Subgrantees receiving less than \$350,000 in federally appropriated Low Income WAP funds to receive up to an additional 5% share of administrative funds. The Department of Environment and Energy will use this provision in the 2021 Program Year.

### V.7.3 Monitoring Activities

*See Training and Technical Assistance Plan Below*

### V.7.4 Training and Technical Assistance Approach and Monitoring Activities

#### TRAINING AND TECHNICAL ASSISTANCE PLAN

##### 1.0 – GENERAL INFORMATION

COMMENTS THAT DO NOT GENERALLY FIT INTO THE AVAILABLE TABLES BELOW

The subgrantees will be required to submit new T&TA budget plans for their T&TA allocation.

Not all training outlined will be paid with DOE funds. We will be using LIHEAP funding to cover some of the training.

##### 2.0 – OVERALL T&TA PLAN

YOUR OVERALL T&TA PLAN MUST INCORPORATE SUGGESTIONS AND FEEDBACK THE FOLLOWING ELEMENTS.

###### FEEDBACK FROM INTERNAL AND EXTERNAL REVIEWS, EXAMPLES INCLUDE:

- FEEDBACK FROM DEPARTMENT OF ENERGY (DOE) PROJECT OFFICER (PO) MONITORING VISITS
- INTERNAL STATE AUDITS
- GRANTEE MONITORING OF THE SUBGRANTEES
- OFFICE OF INSPECTOR GENERAL (OIG) REPORTS
- AMERICAN CUSTOMER SATISFACTION INDEX FEEDBACK, AND
- OTHER. EXAMPLES INCLUDE:
  - TRAINING FEEDBACK
  - TRAINING RETENTION ACTIVITIES

There were no DOE monitoring visits or OIG reports in the past year. Our state audit had no findings or concerns with the program. Monitoring of the subgrantees had no major findings.

Nebraska's ACSI survey identified two focus areas NDEE will be working to improve over the next PY2021 DOE grant period. The first action item the NDEE will focus on for improvement is communication. The Nebraska WAP conducts quarterly meetings with Subgrantees covering best practices and technical working group topics. These meetings help to open communication lines not only between the NDEE and Subgrantees but also between network Subgrantees to help establish strategies to the entire Nebraska WAP network more efficient and effective. The NDEE also holds virtual monthly progress meetings with each Subgrantee and meets via conference call or when there is an immediate concern that needs to be addressed. The development of these open communication opportunities has, and will continue to, provide a better communication between the state and the Subgrantees giving them more opportunities to communicate their issues and challenges and ensure that they are addressed.

The next area of focus where the NDEE scored low on, but still improved by 10 points is partnerships. Since the release of the survey the NDEE has worked to with our Weatherization Assistance Program network to



identify potential partners that possibly have not been considered. NDEE will continue to work with the utility service industry to create partnerships that will benefit our joint customers similar to our work with the Omaha Public Power District (OPPD) to collaborate and use their programs to enhance the Weatherization Assistance Programs in their service territory. This is a key partnerships in working towards leveraging funds from other utility companies to improve the energy efficiency in homes and provide additional funding to support energy efficiency projects that the Weatherization Assistance Program is unable to do if a measure does not SIR or if it is a deferral that needs some type of repair done prior to using the Weatherization Assistance Program. Nebraska is unique in the fact that we have not been able to access utility funds like some other states have done because Nebraska is a Public owned electric utility state, which up to recently has not been a resource for leveraging funds. NDEE will continue to seek out partnerships to improve the WAP.

**EXISTING OR PLANNED ACCREDITED TRAINING CENTER PARTNERSHIP OR WORKING RELATIONSHIP.**

At this time, the Nebraska WAP (NeWAP) network has a BPI Certified Quality Control Inspector at all but one Subgrantee and the other Subgrantee has contracted inspections with an individual with the required QCI Certification. Additionally, the majority of Subgrantees have an experienced Energy Auditor on staff, a number of which are BPI Certified or in the process of earning their certification. The relatively low demand for additional Energy Auditor and/or Quality Control Inspector training in Nebraska makes it more cost-effective for the NeWAP to outsource this training and testing to IREC Accredited Programs with BPI Energy Auditor/QCI Certified trainers, testers and facilities to receive quality training. Historically NeWAP BPI certified staff have met these Comprehensive Training requirements through Santa Fe Community College, the Energy and Environmental Training Center of Kansas City or Indiana Community Action Association and those working relationships will continue.

**PREPARATIONS FOR FUTURE/UPCOMING PROGRAM REQUIREMENTS, EXAMPLES INCLUDE:**

- **UPDATED STANDARD WORK SPECIFICATIONS (SWS)**
- **MIGRATION TO ONLINE WEATHERIZATION ASSISTANT**
- **INCLUSION OF SPECIFIC LANGUAGE FROM WEATHERIZATION PROGRAM NOTICES (WPN)**

- The expiration date for current Nebraska WAP Retrofitting Nebraska Installation Standards for Single Family and Manufactured Housing Field Guide is 04/22/2022 with the DOE submission due by 10/22/2021. During the 1<sup>st</sup> and 2<sup>nd</sup> quarters of PY 2021, Nebraska Grantee staff will work to incorporate and crosswalk the updated Standard Work Specifications (SWS) into the updated Field Guide. Information regarding the Nebraska WAP Field Guide and SWS updates incorporated will be distributed to all Subgrantee technical staff in quarterly Technical Working Group meetings and any modifications that would require a “hands-on” trainings will be handled as a **Specific** trainings in the 3<sup>rd</sup> and 4<sup>th</sup> quarters of PY 2021.
- NeWAP Subgrantees currently utilize local the network NEAT and MHEA program to identify the cost-effectiveness of energy-efficiency retrofit measures considered for implementation in weatherized homes. With the anticipated ORNL migration of NEAT and MHEA to the web, to insure a smooth transition to the web-based version on July 1, 2022, Nebraska WAP grantee staff will:
  - Identify a member of the Grantee staff, or contract with an individual with appropriate WAP experience and certifications, to work with representatives of Oakridge National Laboratory (ORNL) as a Training Provider for the Nebraska WAP and to provide input on curriculum development, to participate in the ORNL train-the -trainer events.

- Schedule, participate in and facilitate in the trainings of Subgrantee QCI and Energy Auditor staff members during the 3rd quarter of PY 2021.
- All Weatherization Program Notices are provided to the Subgrantee’s Weatherization Program Managers for the appropriate dissemination among their staff. WPN information requiring specific language or field work changes will be distributed to all Subgrantee management through monthly Subgrantee virtual meetings. Information will also be provided to technical staff in quarterly Technical Working Group meetings or if needed in **Specific** “hands-on” trainings throughout the program year.

**WHAT PROTOCOLS ARE IN PLACE WHICH ENSURE UNTRAINED STAFF ARE NOT LEFT WITHOUT SUPERVISIONS DURING FIELD OPERATIONS?**

The Nebraska WAP requires Grantee, Subgrantee or sub-contracted staff, paid with weatherization funds, be supervised for all work activities until all appropriate training is completed and/or certification requirements are met. No untrained, unsupervised field staff are allowed on-site to perform weatherization activities.

Below are the training/certifications requirements for completing on-site work without direct supervision:

**Energy Auditor/QCI Staff:**

- Each Subgrantee to have on staff at least one BPI Energy Auditor (EA)/Certified Quality Control Inspector (QCI) or to contract inspections with an individual(s) with the required EA/QCI Certifications. Subgrantees replacing or hiring new EA/QCI staff must be certified or have the knowledge, skills and abilities to meet the Job Task Analysis (JTA) requirements and to secure their certification within six months of their hire date.

**Field Staff:**

- All existing field staff must have been trained, or in the case of new hires be trained, in the appropriate training covering their appropriate JTA, as developed by BPI, through an IREC certified facility (on-line or in-person).
- Replacement or new hires must receive their training within six months of their hire date and be supervised by trained and/or certified staff until such time that skills are satisfactorily demonstrated, and any required certifications are received.
- All existing technical and field staff must be RRP Certified. Subgrantees replacing or hiring new technical or field chief staff must be certified or have the knowledge, skills and abilities to secure their certification within six months of their hire date or be supervised by RRP trained/certified staff until such time certification is received.

Training will be made available to all field staff as per Section 4.0.

**PARTNERSHIPS WITH THE STATEWIDE HOME PERFORMANCE INDUSTRY ON TRAINING ISSUES; IF APPLICABLE.**

The NDEE Training and Technical Assistance plan reflects the current DOE Energy Auditor/Quality Control Inspector Weatherization Assistance Program initiatives while looking forward to implementing future program requirements that will allow Nebraska’s WAP network to meet all of the BPI Home Energy Professional Certifications. During PY2021 and beyond, the Nebraska WAP will make all training opportunities available, for a fee, to individuals, organizations and other interested parties that are not members of the Nebraska WAP Network.

**HOW DOES ANALYSIS CONDUCTED, AS DETAILED IN SECTION V.6 OF THE ANNUAL APPLICATION, INFLUENCE THE DEVELOPMENT OF T&TA ACTIVITIES AND PRIORITIES?**



- Program technical monitoring activities (in-progress and QCI) provide NDEE Monitors the opportunity to note and document specific Subgrantee, crew or contractors inconsistencies or concerns and provide/schedule on-site or Specific trainings to help alleviate any deficiencies. Examples of these types of past training opportunities include sidewall core density testing, CAZ testing (on-site and in group format) with newer, less experienced field staff, and on-site blower door testing with crews/contractors that have provided dubious testing results.
- The results of the Nebraska WAP Annual Consumption Evaluations are provided to all program Subgrantees during one of the program’s quarterly Technical Working Group (TWG) meeting. The individual Subgrantee, as well as the state-wide, results are discussed with technical staff to evaluate “trends” being experienced by specific Subgrantees or within the program as a whole. Following the TWG meeting each agency is provided with each of their reviewed client charts, that shows the energy use impact of the weatherization services on their home. Subgrantee’s review the client file associated with the chart(s) provided to help to educate their crews and/or contractors regarding the impact of the completed work and to address non-beneficial trends that they may be experiencing. The results of the Nebraska WAP Annual Consumption Evaluation is used by NDEE to develop training options or focus on missed energy-efficiency opportunities within the network to ensure upward savings trends. (i.e. adding Refrigerator Replacement as an additional electric savings ECM when the percentage of state-wide electric savings was reduced in conjunction with the full program implementation of ASHRAE 62.2).

### **3.0 – WORKFORCE CREDENTIALS**

**DESCRIBE THE FOLLOWING ASPECTS OF YOUR T&TA PLAN RELATED TO WORKFORCE CREDENTIALS.**

**FEDERALLY REQUIRED CREDENTIALS. EXAMPLES INCLUDE:**

- **ENVIRONMENTAL PROTECTION AGENCY LEAD RENOVATION, REPAIR, AND PAINTING PROGRAM**
- **HOME ENERGY PROFESSIONALS QUALITY CONTROL INSPECTOR CERTIFICATION**

- The Nebraska WAP requires each Subgrantee to have on staff at least one BPI Certified Quality Control Inspector or to contract inspections with an individual(s) with the required QCI Certifications.
- The Nebraska WAP requires all existing Subgrantee technical and field staff to be RRP Certified.
- The Nebraska WAP requires all Subgrantee technical and field staff to be trained in the appropriate training covering the Home Energy Professional Certifications, as developed by BPI, that most closely represents their job duties.

**GRANTEE/STATE REQUIRED CREDENTIALS. EXAMPLES INCLUDE:**

- **BUILDING PERFORMANCE INSTITUTE BUILDING ANALYST**
- **GRANTEE-DEVELOPED CERTIFICATIONS**

The Nebraska WAP has no additional national or Grantee-developed credentialing requirements.

**SUBGRANTEE/LOCAL REQUIRED CREDENTIALS. EXAMPLES INCLUDE:**

- **CONTRACTOR LICENSING**

The State of Nebraska currently does not require state-wide or local jurisdictional licensing of contractors, excluding electricians, but numerous local jurisdictions do have local licensing requirements for specific construction trades that are involved in implementing weatherization work. NeWAP Policies and Procedures require subgrantees to develop and maintain a separate contractor file for each contractor that includes a checklist(s) of all required documentation to assist in reporting as well as NDEE and/or federal monitoring. Required documentation includes, but is

not limited to: General Liability Insurance, Proof of Worker’s Compensation Insurance or documentation of Sole Proprietorship with no employees, current signed contract, Current Contractor’s Registration with the State of Nebraska, Current Electrical, Plumbing and Mechanical Licenses (as applicable) Proof of being a Lead Renovator Firm and Proof of Completing Lead Renovator Training.

**INDUSTRY REQUIRED CREDENTIALS. EXAMPLES INCLUDE:**

- **EQUIPMENT/MATERIAL MANUFACTURE CERTIFICATION**
- **VENDOR CERTIFICATION**  
**(E.G. EQUIPMENT/MATERIAL MANUFACTURE CERTIFICATION, VENDOR CERTIFICATION)**

The Nebraska WAP has no additional equipment, vendor or manufacturer credentialing requirements.

**PROCESS FOR MAINTAINING WORKFORCE CREDENTIALS**

The Nebraska WAP incorporates the following into the NeWAP Policies and Procedures Manual to help ensure and/or maintain Subgrantee staff workforce credentials:

- Subgrantees replacing or hiring new QCI staff must be certified or have the knowledge, skills and abilities to meet the JTA requirements and to secure their certification within six months of their hire date.
- When subgrantees replace or hire new field staff they must be trained in the appropriate JTA, as developed by BPI, through an IREC certified facility (on-line or in-person) within 6 months of their hire date.
- Subgrantees technical staff replacement or new hires must receive training, in the Home Energy Professional Certifications, as developed by BPI, that most closely represents their job duties within six months of their hire date.

**HOW CREDENTIALS ARE TRACKED**

- NDEE has maintained spreadsheets that track all attendees of trainings that have been provided through the Nebraska WAP network since 2010 and additional spreadsheets has been developed to track all Nebraska WAP network staff member trainings (per Subgrantee) who have completed additional virtual trainings or have received BPI QCI and EA Certifications.
- NDEE communicates in quarterly Technical Working Group meetings with Subgrantees regarding their staff training needs and possible new hire training requirements and will also collect individual Subgrantee training information requiring specific language or field work changes will be distributed to all Subgrantee management through monthly Subgrantee virtual progress and update meetings.
- NDEE staff will continue to update the training and certification spreadsheets and make modifications that will assist in tracking initial certifications, training, certification maintenance and continuing education requirements.

**4.0 – TRAINING**

**PROGRAMMATIC/ADMINISTRATION TRAINING**

- FINANCIAL (I.E. 2 CFR 200)
- MANAGEMENT (I.E. 10 CFR 440)
- 

Grantee staff have taken the training provided in the Weatherization Assistance Program Grantee Manager’s Training Toolkit. Grantee staff attends the NASCSP conferences financial trainings. Subgrantee staff are authorized to use T&TA funds to attend trainings from WIPFLI, NASCSP, EOW, and CAP Conferences.

**COMPREHENSIVE TECHNICAL TRAINING ALIGNED TO THE JOB TASK ANALYSIS (IDENTIFY AT WHAT INTERVALS WORKERS WILL RECEIVE REGULAR, COMPREHENSIVE TRAINING AS REQUIRED BY WEATHERIZATION PROGRAM NOTICE (WPN) 15-4)**

- QUALITY CONTROL INSPECTOR
- ENERGY AUDITOR
- CREW LEAD
- RETROFIT INSTALLER/TECHNICIAN

The Nebraska WAP is committed to increasing the network's expertise and numerous program technical training opportunities and hands-on workshops have been conducted with the goal to maximize energy savings, minimize production costs, improve quality of work, and foster management expertise.

**Energy Auditor/Quality Control Inspectors:**

As a result of this commitment, each Subgrantee in the Nebraska WAP network has on staff at least one BPI Certified Energy Auditor (EA)/ Quality Control Inspector (QCI), or contracts inspections with an individual(s) with the required EA/QCI Certifications, and the majority of have an experienced Energy Auditor (BPI Certified) on staff. Any additional required Energy Auditor/Quality Control Inspector trainings will be outsourced to facilities where the network can receive quality training by an IREC Accredited Program with BPI Certified Trainers and Testers where Certification in these areas can be provided. The low demand for the Energy Auditor and Quality Control Inspector training in Nebraska makes it more feasible to outsource these training at random intervals, as needed, at this time.

**Installer and Crew Chief Field Staff:**

Historically the Nebraska WAP provided Installer and Crew Chief training (specifically associated with the Installer Fundamentals, Installer Intermediate and Crew Chief JTAs) at the Laborers International Union of North America Local #1140 (LIUNA) training facility located in Omaha, NE. However, with recent personnel changes and the development of the Installer Badges Toolkit for PY 2021:

- In the 1<sup>st</sup> and 2<sup>nd</sup> quarters Grantee staff will work with the individual contracted to develop the Installers Badges Toolkit for inclusion in the Nebraska WAP as described below in the 4.0 – Training “Other” Section.
- During the 3<sup>rd</sup> & 4<sup>th</sup> quarters the Grantee Energy Conservation Program Coordinators and the Building Program Specialist will work with the Subgrantees state-wide to incorporate the badges training and verification program into the Nebraska WAP network.

Grantee staff will also work to develop and integrate into the network a system of verification for tracking which badges trainees have earned and to provide training options to address for fully issues and/or topics not specifically address by the badges.

Additionally, Subgrantees will be encouraged to include eligible field staff in weatherization industry conferences, trainings and workshops to help to ensure that the Nebraska Network operates to meet the most progressive industry standards and technologies.

**SPECIFIC TECHNICAL TRAINING**

- TOPICS IDENTIFIED DURING MONITORING VISIT(S)
- ENERGY MODELING
- HEALTH & SAFETY. ALL H&S TOPICS IN WPN 17-7 REQUIRE SOME LEVEL OF TRAINING FOR ALL AFFECTED WORKERS, THE FREQUENCY OF THIS TRAINING IS A GRANTEE DECISION. EXAMPLES INCLUDE:
  - AIR CONDITIONING AND HEATING SYSTEMS
  - ASBESTOS

- BIOLOGICALS AND UNSANITARY CONDITIONS
- BUILDING STRUCTURE AND ROOFING
- CODE COMPLIANCE
- COMBUSTION GASES
- ELECTRICAL
- FORMALDEHYDE, VOLATILE ORGANIC COMPOUNDS (VOCs), FLAMMABLE LIQUIDS, AND OTHER AIR POLLUTANTS
- FUEL LEAKS
- GAS RANGE/OVENS
- HAZARDOUS MATERIALS DISPOSAL
- INJURY PREVENTION OF OCCUPANTS AND WEATHERIZATION WORKERS
- LEAD BASED PAINT
- EPA’S LEAD RENOVATION, REPAIR & PAINTING PROGRAM (RRP)MOLD/MOISTURE
- PESTS
- RADON
- SAFETY DEVICES
- VENTILATION AND INDOOR AIR QUALITY
  - AMERICAN SOCIETY OF HEATING REFRIGERATION AND AIR-CONDITIONING ENGINEERS (ASHRAE)
- WINDOW REPAIR, DOOR REPAIR
- WORKER SAFETY
  - OSHA
- ADDITIONAL TOPICS AS DESCRIBED IN HEALTH & SAFETY PLAN
- CLIENT EDUCATION (TRAINING WORKERS TO CONDUCT CLIENT EDUCATION). EXAMPLES INCLUDE:
  - ENERGY SAVINGS STRATEGIES
  - PROGRAM-SPECIFIC INFORMATION. EXAMPLES INCLUDE:
    - WHAT TO EXPECT
    - ADDITIONAL RESOURCES
  - HEALTH & SAFETY ISSUES

**Subgrantee technical staff:** Specific Training will be delivered to the network state-wide based on the specific training type and the facility needs. Specific Trainings will be scheduled at random intervals as needed and may include, but not be limited to, the following:

Anticipated Specific Trainings
Lead Safe Weatherization – RRP Certification
Mobile Home Weatherization
CAZ Testing
ASHRAE 62.2 Updates and Requirements
NEAT/MHEA Web-based Trainings
Blower Door Guided Air Sealing
Installing and Testing Dense Pack Insulation
Quarterly Technical Working Groups
HVAC Inspections and Testing

In the case of both Comprehensive and Specific Training, opportunities will be available for a fee to individuals and organizations that are not members of the Nebraska WAP Network.

Additionally, specific training needs will be addressed as identified during inspections and monitoring completed by NDEE Technical Monitors, the Building Program Specialist, Fiscal Compliance Analyst, NDEE Grant Section Supervisor and USDOE Project Officers.

**CONFERENCES. EXAMPLES INCLUDE:**

- **ENERGY OUTWEST**
- **BUILDING PERFORMANCE ASSOCIATION**
- **NATIONAL ASSOCIATION FOR STATE AND COMMUNITY SERVICE PROVIDERS**
- **COMMUNITY ACTION PARTNERSHIP**

NDEE Technical Monitors, Building Program Specialist and Subgrantee Technical Staff will attend (as needed) weatherization industry conferences, trainings and workshops to ensure that the Nebraska Network operates to meet the most progressive industry standards and technologies and to meet EA/QCI re-certification CEU requirements. Information provided as part of those trainings will be shared with all members of the Nebraska WAP through various training activities, Quarterly Technical Working Group meetings and onsite inspections.

NDEE and Subgrantee management and fiscal staff will attend industry related conferences, trainings, workshops and grant management webinars to increase their knowledge, skills and abilities in grant administration. An example would be continued participation in training and webinars that address grant administration, such as the NASCSP Annual Conference.

**OTHER, PLEASE SPECIFY:**

The Nebraska WAP will utilize T & TA funding to contract an individual, familiar with all of the aspects of the WAP, to develop the Installers Badges Toolkit for incorporation into the Nebraska WAP training program. During the 1<sup>st</sup> and 2<sup>nd</sup> quarters of this program year the contractor will work, in combination with the NDEE technical staff, to:

- select, define and develop a core set of “badges” based on Nebraska’s housing stock and typical energy efficiency and Health & Safety measure
- develop a “certification” process, supervisor qualifications process/requirement and timeline for implementation, and
- work with both the Grantee and Subgrantees to develop employee recognition and tracking options.

## **5.0 – TECHNICAL ASSISTANCE**

DESCRIBE THE TECHNICAL ASSISTANCE ACTIVITIES INCLUDED IN THE T&TA BUDGET CATEGORY.

### **PROGRAMMATIC/ADMINISTRATION SUPPORT**

Technical Monitors, a Building Program Specialist, a Fiscal Compliance Analyst and the Grant Section Supervisor are responsible for providing technical assistance, completing monitoring and evaluating the operation of the Nebraska WAP Subgrantees. NDEE believes that strong internal systems, oversight, training and technical assistance are essential to enable Subgrantees to achieve the objectives of the Nebraska WAP and will ensure quality weatherization work and adequate financial and programmatic management controls. NDEE combines onsite inspections on in-progress units with an extensive training and technical assistance program and administrative, fiscal and technical monitoring to identify areas where more specific training is required to:

- improve work quality,
- improve delivery of program services, and
- to correct Subgrantee administrative and management problems.

### **TECHNICAL SUPPORT**

NEWAP Technical Monitors and the Building Program Specialist are responsible for completing inspections and providing technical assistance activities as part of the Program Monitoring and Compliance Strategy. Technical assistance provided may include but is not limited to:

- staff training,
- policy interpretation,
- State Plan and Field Guide & Installation Standards clarification,
- working with Subgrantees to address deficiencies, and
- training Subgrantees on new and existing weatherization techniques.

Training is essential for staff development and is provided on an ongoing basis to upgrade the quality of service delivered by the WAP Technical Monitors. Each monitor is expected to research and attend training opportunities offered through the Nebraska WAP Training Network, which will enable them to gain additional knowledge and skills in building science principals, weatherization technology, furnace technology, and diagnostic equipment.

Technical Monitoring activities includes but are not limited to:

- **Onsite Inspection of In-progress Units** completed by NDEE Technical Monitors that are BPI Certified Quality Control Inspectors to provide technical guidance or assistance to Subgrantees and to verify compliance with program installation requirements. Some Subgrantees are monitored each month, while others are monitored more infrequently depending on production and identified needs to address quality and/or health and safety concerns. A minimum of 10 percent of weatherized homes for each Subgrantee will be completed with additional inspections completed if recurring inconsistencies are experienced.
- **Quality Control Inspections** on units submitted for reimbursement to NDEE as per Section 3 of WPN 15-4. These inspections will include, but not be limited to diagnostic testing, client file review and energy audit review. Five (5) percent or greater of all completed units will be inspected for each Subgrantee that utilizes a separate Energy Auditor and Quality Control Inspector. Ten (10) percent or greater of all completed units will be inspected for each Subgrantee that utilizes one person to perform both the Energy Auditor and Quality Control Inspections.
- **File Review Monitoring** completed on every weatherized home receiving an In-Progress or Quality Control Inspection.
- February 1, 2018 NDEE implemented a more accountable process for NeWAP Technical Monitoring reporting and follow-up procedures. NDEE Technical Monitors started a process where after they have completed an in-progress monitoring or a QCI monitoring visit, they write-up a report to the Subgrantee identifying any findings, concerns, recommendations, commendations, or best practices, and identify any corrective actions that are required. The report will be reviewed and signed by the NDEE Grant Section Supervisor and sent to the Subgrantee within 30 days of the monitoring visit. The Subgrantee has 30 days to respond and resolve any corrective actions if needed. NDEE will utilize a tracking spreadsheet and use the NDEE online database to ensure all follow-up on Technical Monitoring has been completed in a timely manner.

The NDEE Building Program Specialist completes a **Desktop Energy Audit Review** on review on ten (10) percent of weatherized home. The audits are reviewed to ensure that the appropriate audit tool is used, input values are in accordance with program requirements, energy efficiency measures identified based on SIR's are implemented, etc. Issues and concerns associated with the reviews are discussed in Technical Working Group and any procedural changes are incorporated into the audit process.

**Administration/Fiscal Compliance Monitoring** is an extremely important aspect of weatherization program management and NDEE believes that a successful monitoring program improves Subgrantee operations,



identifies problems early enough for corrective action, promotes quality work and is essential in assisting Subgrantees in fulfilling program objectives.

- The Fiscal Compliance Analyst conducts an Administrative/Fiscal Compliance Monitoring annually with each Subgrantee consisting of both an administrative review and a fiscal review. Prior to monitoring the Fiscal Compliance Analyst will review the Subgrantees required annual audit and previous year's Administration and Fiscal Compliance Monitoring to ensure the Subgrantee has resolved any findings from these audits and monitoring.

The financial review will include:

1. A check of the contract files against contract procedures
  2. Sample journal entries
  3. Inventory reconciliation
  4. Cost categories
  5. Administrative expenses
- The program administration review will include:
    1. The outreach support level and client application process
    2. Reviewing client files for compliance with all federal and state WAP rules and regulations regarding mandated documentation of: household income, client certification of eligibility, owner/landlord permission for weatherization, rent declaration, fuel release statement, inspection statement, lien/debt statement, a complete Building Check & Job Order form/site-specific audit, complete material cost information, funding source designation, final quality control inspection and client release
    3. Client certification and prioritization system
    4. Inspection/quality control systems
    5. Subcontracting system
    6. Review of goals for serving elderly, disabled, and families with Children under 6 years old, high-energy use and high-energy burden
    7. Review of procurement systems
  - A minimum of 20 client files of all USDOE and LIHEAP units completed in the time period being reviewed during the Program Compliance Administrative/Fiscal Monitoring visit will be examined. NDEE staff will review Subgrantee management systems to ensure compliance with rules, regulations, and mandated file documentation. Material records will be examined and inventory will be inspected to verify the adherence to Federal specifications. The financial review will encompass the examination of all completed programs not previously reviewed.
  - NDEE will issue a report within thirty (30) calendar days to the Weatherization Program Director, Agency Executive Director and the Board President detailing the monitoring findings along with recommendations for Subgrantee improvement. The Subgrantee is required to respond within thirty (30) calendar days with a corrective action plan that includes steps to be taken to address findings identified during the onsite monitoring. NDEE Program Monitors and staff will follow-up during onsite visits to ensure that the corrective actions are implemented as directed.

***Administrative/Fiscal Monitoring Schedule for PY2021:***

- **Blue Valley Community Action**  
April 25 – 28, 2022
- **Central Nebraska Community Action Partnership**  
August 23 – 26, 2021
- **Northeast Nebraska Community Action Partner**  
November 1 – 4, 2021
- **Community Action Partnership of Lancaster and Saunders Counties**

May 23 – 26, 2022

- **Community Action Partnership of Mid Nebraska**  
June 6 – 9, 2022
- **Northwest Community Action Partnership**  
October 4 – 7, 2021
- **Southeast Nebraska Community Action Partnership**  
March 21 – 24, 2022
- **Habitat for Humanity of Omaha**  
March 7 – 10, 2022

**Resolution Strategy**

NDEE issues administrative/fiscal compliance monitoring reports to the Subgrantee Weatherization Program Director, Agency Executive Director and the Board President detailing the monitoring findings within thirty (30) calendar days after the monitoring visit along with recommendations for Subgrantee improvement. The Subgrantee is required to respond within thirty (30) calendar days with a corrective action plan that includes steps to be taken to address findings identified during the onsite monitoring. NDEE Administrative and Fiscal Compliance Monitor and staff will follow-up during onsite visits to ensure that the corrective actions are implemented as directed.

**Quarterly Technical Working Group** meetings attended by technical staff personnel from each Subgrantee with NDEE technical staff provide training opportunities to discuss technical issues, specific problems, innovative solutions, and program direction. Technical Working Group meetings will continue to meet on a quarterly basis in PY2021 and will communicate regularly on an as needed basis through email or by conference call.

**HEALTH & SAFETY SUPPORT ACTIVITIES**

**Quarterly Technical Working Group**

Meetings attended by technical staff personnel from each Subgrantee with NDEE technical staff provide training opportunities to discuss technical issues, specific problems, innovative solutions, and program direction. Technical Working Group meetings will continue to meet on a quarterly basis in PY2021 and will communicate regularly on an as needed basis through email or by conference call.

**Lead Safe Weatherization Training**

Lead safe weatherization training, as needed, will be offered through the Nebraska WAP Training Network during the 2021 Program Year. NDEE will continue to ensure that WAP Network staff and crews receive training and ongoing technical assistance regarding Lead-Safe Weatherization work practices through the WAP Training Network and through monthly site visits to observe Lead Safe Weatherization practices of crews and contractors.

**Lead Safe Weatherization Site Visits**

NDEE Technical Monitors make periodic unannounced site visits to homes that are being weatherized to observe that the required lead-safe work practices are being used by crews and contractors. This is an opportunity to clarify and demonstrate best practices related to lead-safe weatherization.

**MONITORING**

**WHAT PERCENTAGE OF T&TA FUNDING IS ALLOCATED TO MONITORING? (IF DEFINED IN SECTION B OF THE BUDGET DETAILS WITHIN THE ANNUAL APPLICATION, INCLUDE THAT WITHIN YOUR DESCRIPTION BELOW.)**

The staff that is responsible for technical monitoring are listed by their position title and percentage of funds associated with administrative or technical monitoring by each person under this award. (This is not a percentage of all awards, such as LIHEAP and USDOE funding, but based on how it is paid as a percentage when working on monitoring activities related to this award.)



NDEE administrative/fiscal personnel:

- Grant Section Supervisor: 80% administrative/20% T & TA
- Fiscal Compliance Analyst: 30% administrative/70% T & TA

NDEE Technical Monitoring Personnel:

- Building Program Specialist: 100% T & TA
- Two (2) Energy Conservation Program Coordinators: 100% T & TA

The NDEE Monitoring Strategy includes the following monitoring and program review activities for each Subgrantee:

<b>Nebraska Department of Environment and Energy Program Monitoring and Compliance Strategy</b>				
<b>Monitoring/Review Activity</b>	<b>Purpose</b>	<b>Conducted by:</b>	<b># of Units</b>	<b>Frequency</b>
Onsite Inspection of in-progress units	Provide technical guidance or assistance to Subgrantees on in-progress projects. Includes lead safe monitoring, training, and/or technical assistance.	(2) WAP Technical Monitors/Certified Quality Control Inspectors	10% of all units for each Subgrantee	Monthly or every other month as needed to reach targeted percentage of unit per Subgrantee.
Onsite badge training and verification	Incorporate the Nebraska WAP badges training and verification program into the network and verify trainee certifications into the tracking tool.	(2) WAP Technical Monitors/Certified Quality Control Inspectors	N/A	Monthly or as needed based on Subgrantee field staff new hire dates
Quality Control Inspection	Quality Control Program Inspections including final diagnostic testing, or on-site monitoring of completed units submitted for reimbursement to NDEE. Includes client file review and energy audit review.	(2) WAP Technical Monitors/Certified Quality Control Inspectors	Minimum of 1 per month per Technical Monitor – 2 per month.  10% of all units for each Subgrantee.	Monthly
On-Site File Review Monitoring	Subgrantee agency office client files	(2) WAP Technical Monitors/Certified Quality Control Inspectors  and  Fiscal Compliance Analyst	File review for each completed project that receives an onsite inspection and during annual Program Compliance Fiscal Monitoring.	Monthly or every other month to ensure that file review is completed for every unit inspected by a WAP Technical Monitor. Annual during Program Compliance Fiscal Monitoring.
Lead Safe Weatherization	Assure that lead-safe procedures are implemented as required.	WAP Technical Monitors	n/a	At least once per quarter/ per sub-grantee and per crew/contractor.
Program Compliance Administrative/ Fiscal Monitoring	Comprehensive review of Subgrantee program administration including a financial review and a systems monitoring.	Fiscal Compliance Analyst	n/a	At least once annually for each Subgrantee.
Desktop Energy Audit Review	Review energy audits submitted with	Building Program Specialist	10% of all completed units	Sampling from Reimbursement Requests

	reimbursement requests to ensure the appropriate audit tool is used, input values are appropriate, energy efficiency measures are identified and implemented according to SIR's for appropriate measures.			
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## 6.0 CLIENT EDUCATION

**DESCRIBE WHAT CURRENT AND PLANNED CLIENT EDUCATION MATERIALS AND/OR ACTIVITIES ARE INCLUDED IN THE T&TA BUDGET CATEGORY. ONLY THOSE PAID FOR WITH T&TA FUNDS NEED TO BE MENTIONED.**

**NOTE: THIS DOES NOT INCLUDE TRAINING WORKERS TO DELIVER CLIENT EDUCATION. THIS SHOULD BE DESCRIBED IN THE TRAINING SECTION, ABOVE.**

CLIENT EDUCATION ACTIVITIES PRIOR TO, DURING AND AFTER WEATHERIZATION WHICH ADDRESS THE WEATHERIZATION PROCESS AND ENERGY SAVINGS DETAILS

The Nebraska WAP approach to client education has been designed to enhance program participants' understanding of home energy efficiency improvements, to increase energy savings, and to contribute to the ongoing effectiveness of installed weatherization measures. Educational materials prepared by NDEE and federal program initiatives are provided to our Subgrantees to provide important client education to each WAP client. Subgrantees will be required to provide (at a minimum) the following client educational materials in verbal and written format:

- Prior to Weatherization
  - Radon Informed Consent/Consent to Perform Work Form WX6
  - Home and Safety Home Screening Questionnaire Form WX7
  - Renovate Right (occupants of all buildings built pre-1978)
  - Lead Hazard Pre-Renovation Form WX3
  - Health and Safety Checklist Form WX8
- During Weatherization
  - Weatherization Deferral Notice Form WX4
  - A Brief Guide to Mold, Moisture and Your Home
  - Nebraska Mold Assessment and Release Form WX5
  - EPA's a Citizen's Guide to Radon
  - Combustion Equipment Safety Fact Sheet
- Following Weatherization
  - Nebraska Weatherization Program — Even More Dollar and Energy Savings Brochure
  - ASHRAE 62.2 Fact Sheet
  - Consumer Product Safety Asbestos Fact Sheet

NDEE developed Weatherization Forms and Factsheets are available for download to all Subgrantees and program clients on the NDEE website at <https://neo.ne.gov/programs/wx/wx-resources.html>

CLIENT EDUCATION ACTIVITIES REGARDING H&S ISSUES AS INDICATED IN WPN 17-7

- AIR CONDITIONING AND HEATING SYSTEMS
- ASBESTOS
- BIOLOGICALS AND UNSANITARY CONDITIONS
- BUILDING STRUCTURE AND ROOFING

- CODE COMPLIANCE
- COMBUSTION GASES
- ELECTRICAL
- FORMALDEHYDE, VOLATILE ORGANIC COMPOUNDS (VOCs), FLAMMABLE LIQUIDS, AND OTHER AIR POLLUTANTS
- FUEL LEAKS
- GAS RANGE/OVENS
- HAZARDOUS MATERIALS DISPOSAL
- INJURY PREVENTION OF OCCUPANTS AND WEATHERIZATION WORKERS
- LEAD BASED PAINT
- EPA'S LEAD RENOVATION, REPAIR & PAINTING PROGRAM (RRP)MOLD/MOISTURE
- PESTS
- RADON
- SAFETY DEVICES
- VENTILATION AND INDOOR AIR QUALITY
  - AMERICAN SOCIETY OF HEATING REFRIGERATION AND AIR-CONDITIONING ENGINEERS (ASHRAE)
- WINDOW REPAIR, DOOR REPAIR
- WORKER SAFETY
  - OSHA
- ADDITIONAL TOPICS AS DESCRIBED IN HEALTH & SAFETY PLAN

Nebraska WAP Subgrantees provide on-site, electronic and hardcopy educational resources to clients including, but not limited to, the following topics:

**Air Conditioning and Heating Systems**

- Discuss appropriate use and maintenance of units.
- Provide all paperwork and manuals for any installed equipment.
- Where combustion equipment is present, provide a copy of the Combustion Equipment Safety FACTSheet describing how to avoid backdrafting.
- When bulk fuel tanks are not removed as part of the weatherization work, discuss and provide information on proper disposal.
- When deferral is necessary information is provided to the client, in writing, describing conditions that must be met in order for weatherization to commence with a copy of this notification placed in the client file.

**Asbestos**

- Inform the client in writing if suspected ACMs are present and what precautions will be taken to ensure the occupants' and workers' safety during weatherization.
- Instruct client in writing not to disturb suspected ACM.
- Provide a copy of the Asbestos FACTSheet information to the client.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

**Biologicals and Unsanitary Conditions**

- Inform client in writing of observed conditions.
- Provide information on how to maintain a sanitary home.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

**Building Structure and Roofing**

- Notify client in writing of structurally compromised areas.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

**Code Compliance**

- Inform client in writing of observed code compliance issues when it results in a deferral.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

#### Combustion Gases

- Provide the client with a copy of the Combustion Equipment Safety FACTSheet with combustion safety and hazards information.

#### Electrical

- When electrical issues are the cause of a deferral, provide information to client on over-current protection, overloading circuits, and basic electrical safety/risks.

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

- Inform client in writing of observed hazardous condition and associated risks.
- Provide client written materials on safety and proper disposal of household pollutants.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

#### Fuel Leaks

- Inform client in writing if fuel leaks are detected.

#### Gas Range/Ovens

- Inform client of the importance of using exhaust ventilation when cooking and the importance of keeping burners clean to limit the production of CO.
- Provide the client with a copy of the Combustion Equipment Safety FACTSheet.
- Provide client with verbal and written information on the use of the CO detector.

#### Hazardous Materials Disposal

- Inform client in writing of hazards associated with hazardous waste materials being generated/handled in the home.

#### Injury Prevention of Occupants and Weatherization Workers & Worker Safety (OSHA)

- Inform client in writing of observed condition/hazard and its associated risks.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

#### Lead Based Paint and EPA's Lead Renovation, Repair & Painting Program (RRP)Mold/Moisture

- Follow pre-renovation education provisions for RRP.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.
- Provide a copy of the Weatherization Deferral Notice completed by the Weatherization Representative and signed by the client or building owner.

#### Pests

- Inform client in writing of observed condition and associated risks.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

#### Radon

- Provide all clients EPA's *A Citizen's Guide to Radon* and inform them of radon related risks.
- Review with all clients the radon informed consent/consent to perform work form. The form must be signed with a copy of the included in the client file prior to receiving weatherization services.

#### Safety Devices

- Provide the client with verbal and written information on the use of smoke detectors and CO detectors.
- Provide the client with a copy of the Combustion Equipment Safety FACTSheet.

#### Ventilation and Indoor Air Quality and the American Society of Heating Refrigeration and Air-Conditioning Engineers (ASHRAE)

- 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.
- Provide the client with a copy of the ASHRAE 62.2 FACTSheet.

#### Window Repair, Door Repair

- Provide information on lead risks wherever issues are identified.

## V.8 Energy Crisis and Disaster Plan

Nebraska will not use any grant funds for energy crisis relief during the 2021 Program Year.

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