State of Ohio

2017

Home Weatherization Assistance Program

State Plan

Ohio Development Services Agency

John R. Kasich, Governor

David Goodman, Director
If you would like to comment on the PY2017 HWAP state plan, please address your response to:

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Columbus, OH  43216-1001

All comments are required to be received by 5 pm April 7, 2017.

Funding for FY 2017 is yet to be determined.
This worksheet should be completed as specified in Section III of the Weatherization Assistance Program Application Package.

V.1 Eligibility

V.1.1 Approach to Determining Client Eligibility

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

All dwelling units to be weatherized shall be determined eligible in such a manner to ensure that each weatherized unit meets the qualifications of CFR 440.22, ‘Eligible Dwelling Units,’ which states that a dwelling unit shall be eligible for weatherization assistance under this part if it is occupied by a family unit:

1. Whose income is at or below 200 percent of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget.

2. 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 at any time during the 12-month period preceding the determination of eligibility for weatherization assistance; or

3. If the State elects, is eligible for assistance under the Low-Income Home Energy Assistance Act of 1981, provided that such basis is at least 200 percent of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget.

All income eligibility shall be documented by the Sub-grantee and/or the Ohio Development Services Agency (ODSA) and will be subject to examination by officials of ODSA, U.S. Department of Energy (DOE) and the Comptroller General of the United States and/or their designated representatives. Customer eligibility may be categorical or traditional, as defined below.

CATEGORICAL ELIGIBILITY

Categorical eligibility applies when one or more persons living in the unit has received cash assistance payments under Title IV or XVI of the Social Security Act or applicable state or local law at any time during the 12-month period preceding the determination of eligibility for weatherization assistance or one or more persons in the unit is eligible for assistance under the Low-Income Home Energy Assistance Act of 1981.

TRADITIONAL ELIGIBILITY

Traditional eligibility applies to any household whose income is at or below 200 percent of the federal poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget, except that the Secretary may establish a higher level if the Secretary, after consulting with the Secretary of Agriculture and the Secretary of Health and Human Services, determines that such a higher level is necessary to carry out the purposes of this part and is consistent with the eligibility criteria established for the weatherization program under section 222(a)(12) of the Economic Opportunity Act of 1964; Pub. L. No. 88-452, 42 U.S.C. § 2701 et seq;

A complete collection of policies and procedures related to eligibility can be found in the Ohio Home Weatherization Assistance Program Policies and Procedures Manual, attached to this State Plan.

Describe what household Eligibility basis will be used in the Program

A household shall be defined as a family unit meeting the qualifications above in order to qualify for weatherization. In Ohio, any household meeting either Categorical or Traditional Eligibility would be eligible to receive weatherization services from the Home Weatherization Assistance Program (HWAP).

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

Ohio will follow the policies outlined in “Summary of Immigrant Eligibility Restrictions Under Current Law as of 2/25/2009” in the U.S. Department of Health and Human Services (HHS) guidelines, located at https://aspe.hhs.gov/basic-report/summary-immigrant-eligibility-restrictions-under-current-law when determining eligibility of qualified and non-qualified aliens. Ohio will not deny access to any alien state or local benefits to any qualified alien that meets the definition of excepted services.

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

Before a customer can be served by HWAP, the sub-grantee must:
● Complete the HWAP application in Ohio Community and Energy Assistance Network (OCEAN)
● Verify and document income eligibility
● Notify the customer of eligibility or ineligibility within 60 days of processing a complete application and income information
● Determine applicant's priority status

Appeals Procedures – The customer eligibility appeals procedure, as determined by the sub-grantee must be prominently posted by the sub-grantee in a common area accessible to all customers that apply for HWAP services.

Describe Reweatherization compliance

Ohio has adopted the re-weatherization date of September 30, 1994. Units weatherized after this date may not be re-weatherized using DOE funds. The priority is to serve dwelling units that have not received prior services. All dwelling units completed prior to September 30, 1994, must have an energy audit performed to cost-justify any additional measures being installed. Sub-grantees track weatherized structures to determine if the unit was previously weatherized. Also, the state uses the Ohio Community Energy Assistance Network (OCEAN), for tracking unit completions to verify that a unit has not been previously weatherized.

Describe what structures are eligible for weatherization

Structures eligible for weatherization include single-family, manufactured housing, and multi-family housing. All structures must be stationary and have a specific mailing (street) address. Campers and non-stationary trailers are not eligible for weatherization services. No weatherization may occur for vacant single-family homes. Also, residences operating primarily as a business may not be weatherized.

Ohio has an agreement with the State Historic Preservation Office regarding weatherization services on dwelling units 50 years and older. A Program Comment was issued by the Advisory Council on Historic Preservation on March 11, 2013 pursuant to 38 CFR 800.14(e), published in the Federal Register on March 14, 2013, and extends the duration of the existing 44 Programmatic Agreements, and any future agreements that may be executed under the prototype Programmatic Agreement, until December 31, 2020. This included Ohio’s agreement with our state historic preservation office. Weatherization measures are largely exempt from prior approval as defined in the agreement. A link to the agreement, which is now extended to 2020, is attached below.


Describe how Rental Units/MultiFamily Buildings will be addressed

RENTAL UNITS

Rental units are eligible for weatherization and represent a significant portion of the units weatherized in Ohio. Landlord contributions for eligible, single-family and manufactured housing rental dwellings shall not be required per 10 CFR 440.22(d) and the Final Rule amending the U.S. Department of Energy (DOE) Weatherization Assistance Program regulations dated March 4, 1993, (58 FR 12514). Sub-grantees may encourage landlord financial participation, but eligible single-family and manufactured housing dwellings may not be deferred for service if the landlord does not consent to a financial contribution. Ohio waives the contribution for carbon monoxide and smoke alarms for all rental units.

Written permission of the building owner or authorized agent is required prior to commencing work. For one-year post-weatherization (one year after the final inspection date) the owner must agree not to raise the rent as a result of the weatherization performed on the unit. In the case of a rent increase, tenants are made aware of their right to appeal in Ohio’s Landlord/Tenant agreement, which must be signed by both parties (owner and tenant) prior to work commencing.

In the situation where the eligible household’s utilities are included in the rent payment, low-income accrual will be determined and documented by the Sub-grantee and contained in the customer file. Measures related to health and safety and energy education received will contribute towards low-income accrual. In this instance, landlord financial participation will be encouraged but not required.

Undue or excessive enhancement of any unit, including rental units, is prohibited. Ohio does not support the placement of liens on properties related to weatherization for any reason.

SINGLE-FAMILY UNITS

For single-family units, Sub-grantees are required to provide proof of ownership in each customer file prior to commencing work. This includes manufactured homes. Most Sub-grantees are able to access documentation on county auditor’s websites, including information on potential foreclosures. Additionally, Sub-grantees must provide customer income and intake information in the customer file for all units. Single-family units for sale or in foreclosure are not eligible for weatherization.

MULTI-FAMILY UNITS
Ohio requires prior approval for multi-family buildings of five or more units and requires an EAQUIP, or equivalent DOE approved audit program, including review of the audit by a state technical monitor and onsite visit. The audit must be approved by the ODSA state technical monitor to the materials being installed. Funds are not set aside for multi-family projects in Ohio. Leveraged funds and projects with contributions from landlords are prioritized, as well as projects that propose significant energy improvements and positive impact on communities. In the case where the landlord can sufficiently document program eligibility or provide additional information to demonstrate that contribution is not feasible, the contribution requirement may be waived by the Sub-grantee/ODSA staff. The HUD/DOE agreement will be recognized by Ohio for selections on the lists of pre-approved multi-family projects. The building eligibility guidelines for Ohio, state that prior to initiating work, the building must have at least 66 percent of units occupied by eligible customers (50 percent for two- and four-unit properties), a valid energy audit (as prescribed in section V.5.2), owner contribution (when applicable), bids for all work exceeding $5,000 and any other pertinent information requested by the monitor. When these conditions are met, the building may be approved for weatherization and work may commence.

It should be noted that units weatherized under the HUD/DOE agreement would be exempt from a required contribution.

GROUP HOMES AND SHELTERS

The eligibility for group homes and shelters is specified in the "Definitions" section of 10 CFR 440 regulations. Shelters for the homeless, battered spouses, etc., may be weatherized. Sub-grantees may count each 800-square-feet as a unit or each floor of the shelter as a unit. Applications for Home Weatherization Assistance Program (HWAP) services from group homes must list all persons living in the home and their incomes (if age 18 and older or an emancipated minor). Applications for shelters are permitted to list only the shelter name. Individual names of persons within the shelter and/or incomes are not required. Prior approval by ODSA is required to weatherize a shelter.

Describe the deferral Process

Conditions that prevent the weatherization of the unit may lead to a deferral. Deferral is recommended if conditions exist that prevent safe, effective, and/or meaningful weatherization. Conditions preventing weatherization include, but are not limited to, the following:

- Standing water, mold, or other moisture issue that cannot be addressed with weatherization funding.
- Electrical or plumbing hazards or structural failures that cannot be addressed as a part of weatherization services.
- Friable asbestos or other asbestos issues that cannot be addressed with weatherization funding.
- Deteriorated lead-based paint surfaces or when the extent and/or condition of lead-based paint may create other health and safety hazards.
- Evidence of large-spread infestations of rodents, insects, and/or other vermin.
- Unsecured pets.
- Sewage or animal feces in the home.
- Improperly stored chemicals, combustible materials, or other fire hazards.
- Maintenance/housekeeping practices that limit access to the dwelling or create an unhealthy work environment.
- Major remodeling is in progress, which limits the proper completion of weatherization measures.
- Threat(s) of violence or abusive behavior to worker(s) or household member(s) during the weatherization process.
- The illegal presence or use of any controlled substance in the home during the weatherization process.
- Occupant has self-declared health conditions that prohibit the installation of weatherization materials.
- Pre-existing code compliance issues.
- The area is slated for redevelopment.
- The area is in a high-risk geographic area (e.g. a flood plain).
- Refusal by the customer to remove certain space heaters, or other unsafe items.
- The unit is in foreclosure or for sale.
- Other issues, as defined by the qualified inspector and approved by the sub-grantee’s Energy Coordinator.

When possible, sub-grantees are encouraged to make referrals or collaborate with other programs including utility sponsored weatherization programs, Healthy Homes programs, home repair programs, and other local resources in order to best serve the customer. Ideally, some of these services are provided by the same sub-grantee installing the insulation measures. However, it is the customer's responsibility to correct the condition(s) causing the deferral in order for weatherization services to proceed. When the conditions causing the deferral have been addressed, customers are asked to contact the sub-grantee to re-evaluate the home. These customers are then given top priority to receive services and are not placed back on the wait list.

Documentation regarding the reason for deferral is required in the customer file and sub-grantees are encouraged to collaborate with their state technical monitor to make decisions regarding deferral. Other reasons for deferral include if the area is slated for redevelopment or is in a high-risk geographic area (e.g. a flood plain), refusal by the customer to remove certain space heaters, or if the home is in foreclosure or for sale.

V.1.3 Definition of Children

Definition of children (below age): 19
V.1.4 Approach to Tribal Organizations

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

Assistance to low-income tribe members and other low-income persons is equal.

V.2 Selection of Areas to Be Served

All 88 counties will be served in Ohio.

Ohio completes an annual Risk Assessment of sub-grantees to evaluate performance and to determine if a sub-grantee is administering an effective weatherization program. The Risk Assessment evaluates sub-grantees based on administrative, technical and fiscal management.

A draft of the Risk Assessment was sent to current HWAP sub-grantees for input and suggestions. Attached is the final version of the Risk Assessment after reviewing comments and feedback from sub-grantees.

A rating of "high risk" for two consecutive years on the annual Risk Assessment performed by ODSA, would result in a competitive proposal process for the sub-grantee territory after the current contract expires.

Should the Risk Assessment rating result in a competitive proposal process for any sub-grantee’s territory, Ohio will proceed in accordance with 10 CFR 440.15.

V.3 Priorities for Service Delivery

The following applicants are prioritized as required by 10 CFR 440.16 "Minimum Program Requirements."

- Elderly person(s)
- Disabled person(s)
- Dependent child(ren) in the home
- High energy burden households
- High energy user households

Appropriate documentation is required in the customer file to substantiate the assigned priority for service delivery.

Customers meeting one or more of the priorities for service delivery as described above will be considered “Priority Applicants”. Customers that apply for HWAP services and do not meet one or more of the priorities for service delivery will be considered “Traditional Applicants”. All customers will be placed on the sub-grantee waiting list for the applicable county in which they reside. Priority Applicants will be placed on the waiting list ahead of Traditional Applicants and ordered by eligibility date (oldest to newest). Under no circumstances shall a Traditional Applicant be served before a Priority Applicant.

Each sub-grantee is assigned a specific minimum number of units to complete per county per program year based on funds allocated. The first 25% (rounded up) of those planned units for that county will be selected for service from the Priority Applicant pool (or Traditional Applicant pool if no Priority Applicants exist) based on earliest eligibility date (ordered from oldest to newest). After the first 25% of eligible applicant units have been completed, the remaining number of units will be selected for service from the Priority Applicant pool (or Traditional Applicant pool if no Priority applicants exist) based on a secondary criterion of the sub-grantees choosing. The sub-grantee may not choose a priority that does not align with the rules established by DOE and the 10 CFR 440.16 “Minimum Program Requirements”.

ODSA has a Priority for Service Delivery waiver form available for sub-grantee use. This form may be submitted to ODSA for acceptance and use that is not discriminatory to the rules set forth by DOE and the 10 CFR 440.16 "Minimum Program Requirements". A copy of this form is attached. Weatherization funds are to be used to equitably serve all eligible customers with priority for service delivery to households meeting the conditions of 10 CFR 440.16. High energy burden/users are defined as a household at or below 175 percent of the Federal Poverty Level at the time of application. These households tend to expend more of their income on utility costs than the median for low-income users.

For FY2017, Ohio will utilize the current electronic data entry system (OCEAN) to track households identified as "High Energy Users" and as having a "High Energy Burden". This data will be reported in the DOE quarterly reports.
V.4 Climatic Conditions

The climate of Ohio is a humid continental climate (Köppen climate classification Dfa) throughout most of the state except in the extreme southern counties of Ohio's Bluegrass Region, which are located on the northern periphery of the humid subtropical climate and Upland South region of the United States. Summers are typically hot and humid throughout the state while winters generally range from cool to cold. Precipitation in Ohio is moderate year-round.

Severe weather is not uncommon in the state, although there are typically fewer tornado reports in Ohio than in states located in what is known as "Tornado Alley." Lake effect snowstorms also are not uncommon on the southeast shore of Lake Erie, which is located in an area designated as "the Snowbelt" (source: Ohio Department of Natural Resources). The highest recorded temperature was 113 °F (45 °C), near Gallipolis on July 21, 1934.[31] The lowest recorded temperature was -39 °F (-39 °C), at Milligan on February 10, 1899.[32] (source: The National Climate Data Center). Ohio Providers use the following weather stations when completing energy audits: (Source: "Comparative Climatic Data", National Climatic Data Center, NOAA, 2001.)

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V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials

All Ohio weatherization work will be performed in accordance with U.S. Department of Energy (DOE)-approved procedures and materials listed in 10 CFR 440 Appendix A.

Ohio sub-grantees will perform all work according to the State of Ohio Standard Work Specifications (SWS), issued May 2015, for Home Energy Upgrades and Ohio Weatherization Field Guide - SWS-Aligned Edition (Field Guide) to set acceptable standards of service delivery for the Ohio weatherization network.

Sub-grantees signature on grant agreement documents will serve as verification that work will be performed in accordance with SWS specifications of work quality outlined in WPN 15-4, section 2.

The following is an excerpt from the sub-grantee agreement:

"Grantee_Name hereby acknowledges and represents that it has current, complete, and up-to-date copies of the following rules, regulations, and guidelines:

• 10 CFR Part 440, Dept. of Energy Weatherization Assistance for Low Income Persons
• 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards
• The Home Weatherization Assistance Program State Plan for the current program year
• The Ohio Home Weatherization Assistance Program Policies and Procedures Manual
• All applicable Information Updates issued by Grantor
• The Ohio Standard Work Specifications for Home Energy Upgrades

Ohio Weatherization Field Guide - SWS-Aligned Edition"
The Field Guide was completed by the Ohio Development Services Agency (ODSA) staff in conjunction with Saturn Resource Management and distributed at the annual all provider meeting on May 2015. A copy of the approved document is attached for reference and is available upon request.

The SWS, Field Guide and Policies and Procedures Manual is available to sub-grantees. Additionally, language in the grant agreement has been modified to include the requirement that all sub-grantees and their subcontractors are required to abide by the SWS, Field Guide, and Policies and Procedures Manual. ODSA has updated the Policy and Procedures manual. Attached.

MANUFACTURED HOUSING

The Weatherization Assistant Manufactured Housing Energy Audit (MHEA) is used to determine cost effective measures. Date of approval for approach to manufactured housing: July 31, 2014.

MULTI-FAMILY

Multi-family buildings containing five or more units are weatherized based on audit results and require the ODSA's prior written authorization. EAOIP or equivalent DOE approved audit program is currently approved for use in multi-family buildings. Multi-family weatherization (five or more units) represented 7% of all Ohio weatherized units from July 1, 2015 to June 30, 2016 (241 of 3572 total completed units). Date of approval for approach to multi-family buildings: February 15, 2013.

SINGLE-FAMILY HOUSING

In 1980, Ohio identified a set of nine standard dwelling types categorized by details of attic, wall, and foundation construction. Ohio's basic housing types are as follows:

- Type A – Wood frame home with full basement and open joist attic
- Type B – Wood frame home with crawl space and open joist attic
- Type C – Wood frame home with combination crawl space/basement and open joist attic
- Type D – Wood frame home with slab foundation and open joist attic
- Type E – Wood frame home with full basement and knee wall attic
- Type F – Wood frame home with post foundation and open joist attic
- Type G – Block, concrete, or log home with slab foundation and open joist attic
- Type H – Manufactured housing with post foundation (see below for additional details)
- Type I – Block (solid wall), concrete, or log home with basement and/or crawl space and open joist attic

Two additional housing types address exceptions to the above categories:

- Type R – Retrofit, housing type does not meet any of the above categories, energy audit performed
- Type S – Shelter

The SWS and Field Guide, state the installation of appropriate materials and methods. Date of approval for Ohio’s Priority Lists of Measures for single unit structures: February 15, 2013.

The approved priority lists of measures for single-family homes by housing type is required to be placed in the customer file, and are designed as pullout sheets. The Priority Lists are attached for your reference.

WEATHERIZATION PROGRAM STANDARDS.

Weatherization Program Standards shall be determined in accordance with the Ohio Weatherization Standard Work Specifications in effect at the time.

If a Sub-grantee subcontracts any portion of the HWAP in accordance with Section 17 of the sub-grantee Agreement, sub-grantee has the additional responsibility to ensure that all programmatic information including training and technical assistance is received by the subcontractor and that the subcontractor is in compliance with all applicable program requirements, including but not limited to adherence to the Standard Work Specifications for Weatherization.

Sub-grantee ACKNOWLEDGMENT REGARDING PROGRAM INFORMATION:

«Sub-grantee_Name» hereby acknowledges and represents that it has current, complete, and up-to-date copies of the following rules, regulations, and guidelines:
Ohio uses the Weatherization Assistant software, which includes the National Energy Audit Tool (NEAT) and Manufactured Home Energy Audit (MHEA), to assess buildings that fall outside of the typical housing types defined above in Ohio’s priority lists of measures, when repair costs needed to install a measure will add to the installation cost of that measure, when optional measures are to be installed, when heating systems must be replaced or when required for any other reason. This audit also may be employed when electrical baseload measures (i.e. lighting or refrigerator appliance replacements) are being considered. All refrigerator replacements must show documentation in the administrative file that the appliance was metered for at least two hours and the Savings to Investment ratio (SIR) is 1.0 or greater.

For single-family homes, work shall be done according to the priority list of measures. All manufactured homes require a MHEA. All single-family, site-built homes 15 years of age or newer at the time of initial inspection require a valid energy audit prior to weatherization using audit software approved by the U.S. Department of Energy. Only measures that are cost effective showing a SIR of one or greater may be installed. Measures with an SIR of one or greater are determined to be cost effective, meaning the lifetime savings produced by the measure is greater than the total cost of installation.

All buildings with five or more units must be audited using EAQUIP or equivalent DOE approved audit program. Sub-grantees may solicit an outside engineering firm or contractor to perform an audit on this type of building.

In all cases, including when Priority Lists are used to determine measures for installation, ODSA reserves the right to limit expenditures per unit or to limit specific retrofits if ODSA determines that a sub-grantee is not appropriately approaching the work being performed on units.

V.5.3 Final Inspection

As specified in 10 CFR 440.16(g), no dwelling unit will be reported to the Ohio Development Services Agency (ODSA) as completed until a Quality Control Inspector has performed a final inspection and certified that applicable work has been completed in compliance with the Standard Work Specifications (SWS), Ohio Weatherization Field Guide - SWS-Aligned Edition, and in accordance with the priorities as determined by the Building Classification Housing type priority list or as determined by a DOE approved energy audit. In addition, to ensure a separation of duties, the initial inspector or energy auditor and final inspector or quality control inspector must be different individuals. Under no circumstances are final inspectors permitted to inspect their own work (e.g. install or help install the furnace and then complete the final inspection on the work performed).
All final inspections must be conducted by a Building Performance Institute certified Quality Control Inspector (QCI). Currently, a total of 120 individuals in Ohio are confirmed to have earned the QCI credential to serve 26 sub-grantees in 88 counties. This exceeds the number reported in the plan last year (119) and ensures all completed work is properly inspected. Sub-grantees may employ or contract for these services. Presently, one sub-grantee does not employ a QCI and must contract for the services.

Prior approval by ODSA is required for all contracted services. Sub-grantees request approval by submitting appropriate documentation to ODSA, generally with the grant application. Approvals also may be granted throughout the program year when necessary. A master list of all contractors approved to work in weatherization is maintained by ODSA staff.

Final inspection documentation and certification will be placed in the customer’s file. If monitored by ODSA staff, the file will contain signatures of the inspections completed by the QCI inspector.

Relevant Policies and Procedures

Every unit reported as a “completed unit” must receive a final inspection ensuring that all work meets the minimum specifications outlined in the Ohio Standard Work Specifications, the techniques described in the Ohio Weatherization Field Guide - SWS-Aligned Edition and in accordance with 10 CFR 440.

Units must be inspected using criteria found in the specifications outlined in the Work Quality section of WPN 15-4.

Every customer file must include documentation that certifies that the unit had a final inspection and that all work met the required standards. The inspection must be performed and the certification signed by a Quality Control Inspector. Final inspections also must be signed by the eligible customer and must be placed in the customer file and uploaded to OCEAN along with Building Weatherization Reports. Units without a valid final inspection will not be counted in production.

The Quality Control Inspector must include an assessment of the original audit or Priority List and confirm that the measures called for on the work order were appropriate and in accordance with the grantee audit procedures and protocols approved by DOE.

Additionally, the following language is required on all final certification forms:

I certify that the work completed on job number ________ meets all requirements of the Ohio Standard Work Specifications and installation procedures as described in the Ohio Weatherization Field Guide - SWS-Aligned Edition. I grant the Ohio Development Services Agency (ODSA) and its designees permission to use information associated with this job for the purpose of conducting weatherization studies or statistical analyses. I understand that no information obtained for job number ________ shall be made public in such manner that the dwelling or its occupants may be identified, except with written consent by the occupant.

A signature is required on the grant agreements by the executive director of the sub-grantee organization. Grant agreements contain the following language:

In order to confirm that the Sub-grantee and contractors have read and acknowledged the expectations for work quality outlined in the grant, language from the Sub-grantees signed grant agreements has been amended as follows to include the requirement to abide by Standard Work Specifications:

STANDARDS AND TECHNIQUES FOR WEATHERIZATION. Standards and techniques for weatherization shall be determined in accordance with 10 CFR Part 440.21; the applicable provisions of the State Plan; and the rules and regulations promulgated pursuant thereto.

If Grantee subcontracts any portion of the HWAP in accordance with Section 17 of this Agreement, Grantee has the additional responsibility to ensure that all programmatic information including training and technical assistance is received by the subcontractor and that the subcontractor is in compliance with all applicable program requirements, including but not limited to adherence to the Standard Work Specifications for Weatherization.

Ohio’s Weatherization Training Center offers a three-day preparatory course in addition to standard inspector coursework in an effort to prepare students for the certification test, which includes both a hands-on field test component and standardized test component. The pre-test posted to the WAPTAC website is used to gauge participants’ readiness to take the exam. A score of 70 or better is recommended on this “practice test” prior to sitting for the written Quality Control Inspector exam.

Ohio allows DOE Training and Technical Assistance funds to be used up to three times, per person to take or retake any portion of the Quality Control Inspector exam.

Final inspections are required to be signed by the eligible customer. In the event the customer refuses, sub-grantees should contact their ODSA technical monitor for guidance. If the customer allows the ODSA technical monitor to perform an inspection and the work is certified by an ODSA staff person with the QCI credential, the requirement for customer signature may be waived in writing by ODSA staff and the unit may be reported as completed unit.

Inspection Forms

Attached is the state monitoring inspection form, based on the tool provided by DOE, and the final inspection certification form. This form is placed in the customer’s file and serves as a recording of all Quality Control Inspections performed on the unit(s).

Consequences for Failure to Provide a QCI

In the event a sub-grantee submits a unit(s) without a certified Quality Control Inspection or the Quality Control Inspector does not perform an adequate inspection, ODSA will take appropriate action. This may include additional training requirements, increased monitoring and/or disallowing costs for the units.
Consequences for failure of QCI to inspect to the most recent approved DOE Field Guide

1st Violation will result in verbal warning, T&T&A with state certified QCI monitor, and Sub-grantee may be required to perform another Quality Control Inspection and/or additional work to bring the work up to the SWS standards.

2nd Violation will result in written warning, T&T&A with state certified QCI monitor, and Sub-grantee may be required to perform another Quality Control Inspection and/or additional work to bring the work up to the SWS standards.

3rd Violation will result in dis-allowed costs for Sub-grantee

4th Violation will result in QCI being referred to BPI for revocation of certification

V.6 Weatherization Analysis of Effectiveness

According to the Home Energy Affordability Gap Study 2014 (2nd series) published in April 2015, Ohio households with incomes of below 50% of the Federal Poverty Level pay 32% of their annual income for their home energy bills. According to the most recent five-year American Community Survey, the number of Ohioans whose income is below 50% is nearly 336,000. More than 388,000 additional Ohio households live with incomes between 50% and 100% of the Federal Poverty Level and face a home energy burden of 17%. Bills for households with incomes between 150% and 185% of the Federal Poverty Level take up 8% of income. Ohio households with incomes between 185% and 200% of the Federal Poverty Level have energy bills equal to 7% of income. In 2014, the total number of Ohio households below 200% of the Federal Poverty Level rose from the prior year.

Assessment of Effectiveness of Sub-grantees

Ohio uses a variety of methods to assess the effectiveness of sub-grantees. Monitoring, both technical and administrative/fiscal, is performed as indicated in section V.8.3. Ohio may require Training and Technical Assistance and/or more frequent monitoring when necessary.

Additionally, Ohio has developed a Risk Assessment Tool to evaluate each sub-grantee’s effectiveness in key areas, including financial audit and fiscal procedures, technical performance, and administrative performance. Items reviewed include single sub-grantee audit findings, ability to meet production goals and other performance measures, expenditures, average cost per unit, ability to meet deadlines and monthly reporting requirements, health and safety performance, staff qualifications and experience, procurement policies and procedures, and contractor/crew management. Sub-grantees are identified as high risk, moderate risk, or low risk based on the results identified in the tool. All sub-grantees will be assessed for risk annually following the program year of review. Results are shared with each sub-grantee and ODSA audit staff as a tool to develop sub-grantee capacity and direct appropriate training or technical assistance. This tool also is used to compare performance between sub-grantees.

How are the comparisons used to develop training opportunities/priorities?

High risk agencies must submit a corrective action plan to address the results of assessment. ODSA administrative monitors also follow up on results of the risk assessment and the sub-grantee’s plans for improvement at scheduled visits. Training and technical assistance visits may be required by ODSA or requested by the sub-grantee to support those with performance issues. Sub-grantees identified as high risk are placed in a Continuous Improvement Plan until the next annual risk assessment is performed. Additionally, a designation of high risk for two consecutive years will result in the competitive rebidding of the service territory.

Incorporating Monitoring Feedback

Monitoring feedback is continuously incorporated into program procedures. Previous monitoring requirements or recommendations are noted in current monitoring reports, as are repeated required or recommended actions. Aggregate data on sub-grantee performance is analyzed and used to provide training and technical assistance.

Technical monitoring reports are copied to the Ohio Weatherization Training Center, which tracks findings and uses the information to guide training and technical assistance efforts. OCEAN, ODSA’s online database, also tracks the results of technical monitoring. Reports are available that summarize findings by sub-grantee or for the entire network, breaking down findings by type. These reports also can be used to direct future monitoring and training and technical assistance.

Path of Continuous Improvement/Continuous Improvement Plans

When a sub-grantee fails a technical monitoring visit (less than 60 percent of units monitored do not pass the quality control inspection by ODSA staff), the sub-grantee will be placed in a Continuous Improvement Plan. Frequency of sub-grantee of monitoring is increased and technical assistance or training may be required.

When program management or fiscal findings are cited on an administrative monitoring visit, the sub-grantee is given 30 days to respond. Failure to respond will result in non-compliance with Articles 10 and 11 of the HWAP agreement, and could result in disciplinary action. Training on administrative and fiscal policies is delivered by ODSA audit staff at conferences, meetings, webinars, all-provider trainings and other venues as needed. ODSA audit staff performs scheduled fiscal audits on all sub-grantees for all grants administered by ODSA.

Tracking Sub-grantee Performance Reviews
High-level information resulting from sub-grantee performance reviews is tracked in Montrak. Tracked data includes sub-grantee name, date of visit, number of units monitored and percentage of units monitored, and response due date. More detailed information on findings, required actions, and pass/fail rate of units monitored is tracked in OCEAN.

Statistics regarding sub-grantee performance such as production numbers and air leakage reductions are collected on Building Weatherization Reports (BWRs) and tracked in OCEAN. Reports are reviewed for progress toward production goals, expenditures, anomalies and/or other questions and concerns and may be referred back to agencies for explanation or corrections, or to the technical/administrative monitors for follow-up, when applicable.

Monitoring Process for Improvement

Monitoring is formal and scheduled in Ohio for both programmatic and fiscal compliance. Ohio employs a Health and Safety Notification Form and requires any findings be resolved as soon as possible, and no later than three working days. These reports are sent as part of the monitoring report to the sub-grantee, and resolution is noted in the report along with findings. All findings must be resolved within 30 days. The response is then reviewed and accepted via letter to the sub-grantee. All findings become part of the Risk Assessment review for the sub-grantee. More information on the monitoring process can be found in section V.6.3.

Costing of Measures

To ensure measures are being priced accurately, Ohio requires that sub-grantees use an approved price list (required submission with grant application for approval) or obtain three bids for work completed by contractors. Additionally, agencies must keep evidence of cost comparisons for regularly purchased items and have it available for review at the administrative monitoring visit. All vehicles and equipment with an acquisition cost of $5,000 or more requires prior approval from ODSA. Ohio crew-based programs purchase inventory up front and are reimbursed by the grant upon installation of the materials. No grant-owned inventory is permitted.

V.7 Health and Safety

In accordance with the Final Rule and Weatherization Program Notice (WPN) 11-6 and the Standard Work Specifications (SWS), the Ohio Development Services Agency Sub-grantee (ODSA) adopts the following approach to implementing health and safety measures. Sub-grantees shall comply with all applicable state and local building codes and regulations.

ODSA provides its sub-grantees with an allocation of funds, identified as a budget line item, to be used for required health and safety activities on dwelling units being weatherized. For PY 2017, this will amount to 14.9% of the DOE Operations budget. From July 1, 2016 through January 31, 2017, weatherization sub-grantees averaged $1,239.95 (Total Health and Safety expenditures of $2,057,075.54 divided by 1,659 total completed units) for health and safety per household.

Many agencies do not require the maximum level of health and safety funds and re-program the funds to Program Operations, particularly when leveraged funds are available to support health and safety measures. Specific health and safety related measures are reported in the OCEAN data system. Traditionally, some sub-grantees expend all health and safety funds while others may re-program excess to program operations, specifically in cases where leveraged funds are available to assist with health and safety measures. Availability of these leveraged funds is not guaranteed. Therefore, Ohio proposes to budget 14.9% in order to cover the potential health and safety needs of programs.

The purchase and maintenance of personal protective equipment and other safety equipment is allowed. Each grantee has a local Training and Technical Assistance budget and those funds may be used to provide training and certifications to address health and safety issues. Ohio tracks health and safety labor and materials costs on its Building Weatherization Reports (BWRs) which populate a statewide database making it possible to track and manage all health and safety costs. ODSA encourages sub-grantees to maintain coverage for Pollution Occurrence Insurance (POI), but it is not mandatory. Ohio performs compliance monitoring for OSHA rules and regulations when performing monitoring on in-progress units and ensures sub-grantees have Hazard Communication Plans in place.

When technical monitors find a home that fails to meet Health and Safety Standards, the monitor completes a Health and Safety form that details the finding(s). The sub-grantee is required to respond immediately and resolve the issue within three calendar days.

TRAINING

Training on health and safety issues is provided by the Ohio Weatherization Training Center (OWTC).

OWTC and ODSA monitoring staff also provide onsite training and technical assistance upon request or as a requirement to clarify field issues with regards to installation of health and safety measures. See attached class list for a full list of training options related to health and safety. Training requirements also are listed later in this section with regards to specific health and safety measures.

DEFERRAL NOTIFICATION OF HEALTH OR SAFETY CONCERN THAT PRECLUDES SERVICES

Deferral is discussed in section V.1.2 of this application. The Ohio Deferral Form is pre-printed in triplicate and provided in bulk to agencies. One copy goes to the customer, another to the homeowner/landlord, and the last copy remains in the customer file for reference. Deferred customers who resolve the outstanding issues must be moved to the top of the priority list and served as soon as possible by the sub-grantee. The form includes the customer's name and address, a clear description of the problem, a statement indicating the conditions under which weatherization shall resume, the rights and responsibilities of both the sub-grantee and customer, and the customer's and inspector's signatures.
CUSTOMER HEALTH AND SAFETY

Customers must be informed of any health and safety risk discovered during the inspection process. In the case of a rental property, the property owner and/or authorized agent also must be notified. As potential hazards are identified, they are to be analyzed in terms of their severity and how they will be addressed, up to and including deferral. Health and safety expenditures also must be considered reasonable, even if allowable expenditures for weatherization. This is determined by the energy auditor. Customers may appeal these decisions to ODSA. If a potential hazard cannot be properly addressed using HWAP funds, the sub-grantee must notify the customer in writing (see Deferral section of V.1.2 for additional information).

Allowable HWAP measures fall into three broad categories: Energy Conservation Measures, Incidental Repairs, and Health and Safety Measures.

ENERGY CONSERVATION MEASURES

Energy Conservation Measures are incorporated into Ohio's Priority List of Measures and/or can be cost justified with a Savings-to-Investment Ratio (SIR) of 1.0 or greater using Weatherization Assistant software for single-family and manufactured homes and EQUIP or other DOE approved audit software for structures with five or more units. Ohio does not permit partial weatherization of a building. The entire priority list of measures or audit list of items with an SIR of 1 or greater are required to be installed.

INCIDENTAL REPAIRS

Per Weatherization Program Notice 12-9, Incidental Repairs are defined as "materials installation performed because it is deemed necessary for the effectiveness of one or more Energy Conservation Measures." These costs are recorded on Ohio's Building Weatherization Reports (BWRs). Incidental Repairs may not exceed $600 (DOE) for materials and labor for the structure for single-family and manufactured homes. All incidental repairs for multi-family structures of five or more units must be submitted with the building audit for approval and will be determined on a case-by-case basis based on the reasonableness of the requested repair. Incidental Repairs must include an explanation for their need and relationship to a specific Energy Conservation Measure or group of Energy Conservation Measures as required in WPN 12-9.

Incidental Repairs may include (but are not limited to) replacing a pane of broken window glass, minor repairs to drywall or floors, or other minor repairs that prevent deferral of weatherization. Ohio does not distinguish "minor" from "major" repairs. Instead, ODSA limits the amount of incidental repair by the dollar amount stated above and agencies may not exceed this limit for repairs meeting the definition of Incidental Repairs.

HEALTH AND SAFETY MEASURES

Health and safety measures are measures necessary to maintain the physical wellbeing of both the occupants and/or weatherization workers where the action is necessary to effectively perform weatherization work. The reason for all health and safety work must be documented in the customer file, including photographs and written documentation. Energy Auditor (inspector) approval is required for all health and safety work completed in the home.

Measures not included on the Ohio Priority List of Measures must be evaluated to determine if they can be cost justified with a SIR of 1.0 or greater. Heating systems require an energy audit if replaced with HWAP funding to determine if the measure may be considered an Energy Conservation Measure. Sub-grantees also may utilize a buy-down of heating system replacements on multi-family housing in order to achieve an SIR of 1.0 or greater. Buy-down funds must be from a nonfederal source.

Components of Health and Safety in regards to Weatherization

Air Conditioning and Heating Safety

“Red tagged”, inoperative, or nonexistent heating system replacement or installation is allowed where climate conditions warrant unless prevented by other guidance herein. As described in section V.4 Climatic Conditions, Ohio's climate requires weatherization and is considered a "heating climate," therefore, Ohio addresses heating system replacement with the HWAP program. Heating appliances (i.e. furnaces, boilers, vented space heaters) are to be repaired or replaced when the existing unit is not operational, unsafe, or nonexistent. This is to ensure that steps are taken to eliminate unsafe levels of carbon monoxide in the living area, and to protect the safety of the inspector while obtaining diagnostic readings. Justification documentation and photos demonstrating the specific issue(s) with the existing system are required in the customer file. Trained staff must first attempt to cost justify heating system replacement and install as an Energy Conservation Measure. If not cost justified, the system and all components must be charged to the Health and Safety category. Repairs must be charged to the Health and Safety category, not to exceed the limits stated above, or to Incidental Repair when meeting that definition. Customer education must be performed to explain the importance of appropriate use and maintenance of the replacement unit. In addition, the sub-grantee must facilitate the proper disposal of bulk fuel tanks, when applicable.

Appliances and Water Heaters

Replacement of water heaters using Health and Safety funds is allowed. Sub-grantees must ensure that the replacement unit drafts properly in worst case depressurization scenario, and that the combustion analysis readings of unit are within the appropriate guidelines. Replacement and installation of appliances other than water heaters – such as cook stoves, washing machines, or clothes dryers – are not allowed.

Customer education is required to explain the importance of appropriate use and maintenance of the replacement unit. In addition, the sub-grantee must remove and properly dispose of the old heater.

The cost to clean and adjust the gas pressure to eliminate the production of carbon monoxide in a cook stove (stove top burners or oven) must be charged to the Health and Safety budget category. Additionally, the installation of any parts to the cook stove (i.e. pressure regulator, orifices, flexible range connectors) must be charged to the Health and Safety budget category.
If it is determined that weatherization work cannot be performed without creating a hazard, the work must be deferred. The customer is to be informed in writing of the potential hazard.

Wear adequate Personal Protective Equipment (PPE). If it is determined that weatherization work cannot be performed without creating a hazard, the work must be deferred. The customer is to be informed in writing of the potential hazard.

Follow all health and safety instruction from the inspector.

Contract with certified asbestos testers and abatement specialists to mitigate asbestos problems before or during weatherization.

If the vermiculite insulation does not contain asbestos, normal weatherization activities may continue. A copy of the clearance test must remain in the customers file.

Caution should be used when using a blower door in a home with vermiculite that does not contain asbestos. When vermiculite is present, perform a blower door pressurization test, do not depressurize the interior of the home.

If it is determined that weatherization work cannot be performed without creating a hazard, the work must be deferred. The customer is to be informed in writing of the potential hazard.

Follow all health and safety instruction from the inspector.

Wear adequate Personal Protective Equipment (PPE). If it is determined that weatherization work cannot be performed without creating a hazard, the work must be deferred. The customer is to be informed in writing of the potential hazard.

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

The cost of removal or mitigation of conditions that may lead to or promote biological concerns and unsanitary conditions is allowable to the extent that removal or mitigation is necessary to allow effective weatherization work and/or to assure the immediate or future health of workers and customers. This refers to the repairs of broken sewer/drain pipes or unplugging sewer backups. Unsanitary conditions are occasionally present that put crews and staff at risk, and it is the responsibility of the customer to correct them before work can begin. Sub-grantees would not be expected to address these conditions. These items may include but are not limited to pet or human feces in living areas, evidence of hoarding or “path houses” where access to measures is obstructed, rotting wood, etc.

Addressing bacteria or viruses is not an allowable cost. Deferral may be necessary in cases where a known agent is present in the home that may create a serious risk to occupants or weatherization workers.

Building Structure and Roofing

Inspectors must be aware of the structural condition of the dwellings to be weatherized. Roof repairs that exceed the Incidental Repair limit are beyond the scope of the program. Rehabilitation of dwellings is beyond the scope of HWAP. If it is determined that the dwelling unit is unsafe or requires repairs greater than allowed by the scope of the program, then planned weatherization activities must be deferred and a referral should be made to a local home rehabilitation program. Sub-grantees must notify the customer of structurally compromised areas and document with pictures that are to be included in the customer file (see "Deferral Policy").

Code Compliance

Correction of preexisting code compliance issues is not an allowable cost other than where weatherization measures are being conducted. State and local codes (or jurisdiction having authority) must be followed while installing weatherization measures. Condemned properties and properties where “red tagged” health and safety conditions exist that cannot be corrected under the program should be deferred. Notify the customer of observed compliance issues.

Combustion Gases

Proper venting to the outside for combustion appliances, including gas dryers, is required. Repair of all combustion appliance fuel line leaks from the meter to the combustion appliance(s) is required. This is an allowable health and safety charge. Correction of venting is allowed when combustion testing indicates a problem and also must be charged as a health and safety measure. Combustion testing must include (1) the visual inspections of appliances and venting to ensure adequate clearances to combustibles, and (2) testing natural draft and fan induced draft appliances for proper draft and spillage under worst case depressurization conditions before and after air sealing work on the home. Customer education must be performed to explain the importance of combustion safety and possible hazards.
Major drainage issues (for example, earth sloping toward dwelling) are beyond the scope of HWAP. Homes with conditions that may create a serious health concern and require more than incidental repairs should be deferred.

Customer education must be provided to explain the importance of cleaning and maintaining drainage systems, as well as the benefits of landscape design (where applicable).

**Electrical, other than Knob-and-Tube Wiring**

The cost to correct the presence of electrical system hazards, such as inadequately sized service, improperly grounded service, hazardously located service, inadequately sized or insufficient number of circuits, circuits in poor condition (i.e. live bare wires, etc.) and wiring inappropriate to its location are allowable costs to the Health and Safety budget category. A licensed electrical contractor shall be used to perform any electrical work needed to correct the hazard. Customer education must be performed to explain the importance of basic electrical safety/risks and the hazards of overloading circuits.

**Electrical, Knob-and-Tube Wiring**

As part of the initial inspection process, inspectors make note of the presence of knob-and-tube wiring and its condition. In some cases, utility program funds may be used to abate electrical system hazards and install properly sized fuses and breakers to ensure circuits are not overloaded. Customer education must be performed to explain the importance of basic electrical safety/risks and the hazards of overloading circuits.

It is not allowable to install insulation over knob and tube wiring in sidewalls. Attic insulation must be channeled around knob and tube wiring, per the Standard Work Specifications (SWS). It is allowable to charge rewiring to the Health and Safety budget category, or to defer the home if cost prohibitive. It also is allowable to install all other allowable measures in the home or unit if meaningful weatherization is still possible.

**Fire Hazard**

Inspectors also identify potential fire hazards within the dwellings. The SWS includes guidance that governs combustion appliances and their associated venting systems. The guidance outlines how to identify and eliminate potential fire hazards including inadequate clearances between combustion appliance cabinets, venting systems and combustible materials. The SWS also states how to handle potentially dangerous creosote buildup in chimneys and wood stove flues. Potential fire hazards are addressed with Health and Safety funding or other leveraged funding sources. Adherence to appropriate NFPA codes when repairing or replacing appliances minimizes the potential for fire hazards. Customer education must be performed to explain the importance of addressing any fire hazards within the home. If possible, the inspector should address any potential fire hazards within the scope of the weatherization program; however, the customer must be notified when a fire hazard is identified and it cannot be treated during the weatherization process. In some cases, this may result in deferral or referral of the home until the fire hazard can be corrected.

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

Formaldehyde, tobacco smoke, thinners, solvents, cleaners and other pollutants that are capable of negatively impacting indoor air quality are identified during the initial inspection (and in many cases, are discussed by sub-grantees intake staff during scheduling). Basic strategies such as proper storage and ventilation are part of customer education and can be used to eliminate problems. If pollutants pose a risk to workers and removal cannot be performed or is not allowed by the customer, the unit must be deferred. Removal of pollutants not necessary to perform weatherization (i.e. cleaning old paint cans and oil out of garages) is not allowed. Customer education must be performed to explain the importance of safe and proper disposal of household pollutants.

**Injury Prevention of Occupants and Weatherization Workers**

Sub-grantees must take all reasonable precautions against performing work on homes that will subject workers or occupants to health and safety risks. Repairs of stairs and installation of handrails may be conducted only when necessary to effectively weatherize the home and may be charged according to the guidelines in WPN 11-6 to either Incidental Repairs or Health and Safety-Miscellaneous budget categories when meeting those definitions. For example, if the stairs to the basement are broken and not safe to use, but the heating appliances are located in the basement, then it would be necessary to repair the stairs to effectively weatherize the home. If the measures are not necessary to perform effective weatherization, they are not allowed. For example, if the stairway to the second floor was missing a handrail and the occupants needed a railing for stability when going up or down the stairs, this would not be allowed because it is not affecting the weatherization of the home. This would include the installation of a handicap ramp for entrance into the home. When possible, sub-grantees may make referrals to other programs or use leveraged funds to address these concerns.

Workers are to observe if dangers are present that would prevent weatherization. Customers must be informed by Inspectors and/or workers of observed hazards and associated risks, when applicable. Some sub-grantees are able to collaborate with local programs to leverage funding to address trip and fall hazards within households.

**Lead-Based Paint**

The cost of lead paint abatement is prohibited. However, the cost to test building materials for the presence of lead paint and the cost of precautions to prevent causing a lead paint contamination problem while installing weatherization materials is allowable. Lead-based paint (LBP) was used on the majority of houses built before 1978. It is probable that LBP is present on houses weatherized that were built before 1978. If LBP must be disturbed (cut, scraped, sawn, drilled, etc.) during the weatherization work, that work shall be done in a “lead-safe” manner. Ohio implements the approach defined by the Environmental Protection sub-grantee (EPA) under the Lead Renovation, Repair, and Painting Rule (RRRP) and has developed a training that uses the Montana State University Lead Safe Weatherization (LSW) curriculum as the minimum requirement.
Weatherization contractors, crew members or other persons installing energy conservation measures for HWAP must earn the EPA Certified Renovator credential.

Other entities performing work (e.g. HVAC, plumbing, or electrical professionals) for HWAP and working in pre-1978 housing where the possibility exists to disturb painted surfaces of an area greater than 6 square feet per room for the interior, and/or 20 square feet for exterior work must have a certified EPA Renovator on-site.

The EPA Certified Renovator credential requires completion of the eight-hour Lead Renovation, Repair and Painting training program from an EPA-accredited training provider, or renewing certification with a four-hour refresher class. Agencies may assign lead-safe work only to contractors meeting this requirement.

Documentation for training credentials must be onsite (i.e. copies of the training certificate or the certification as a renovator must be available).

Even when the work has disturbed less than the de minimis amounts of paint as specified by the U.S. Environmental Protection Sub-grantee (EPA), all work should be performed in a lead safe manner.

Proper record keeping using the Post-Renovation Lead Recordkeeping Checklist must be completed. Other required paperwork includes:

- Copies of the Certified Renovator and other installer’s certificates;
- Pictures of the containment area with a posting of the job number attached to the containment materials; and
- Picture(s) of the Approved Wipes alongside the Cleaning Verification Card showing that the cleaning process has passed, with the job number in the picture.

All ODSA Technical Field Staff persons have received training in LSW and completed the LRRP course.

All sub-grantees are required to provide customers a copy of "The Lead-Safe Certified Guide to Renovate Right," if applicable, prior to the start of work. This brochure will be given to an adult resident of each pre-1978 residential building to be weatherized. Written acknowledgment is required, proving the adult resident received the brochure, or a certification in writing that the brochure was delivered to an adult resident and the sub-grantee was unsuccessful in obtaining a written acknowledgment, as directed in the publication. Confirmation of receipt of this brochure by the customer will be maintained in the customer file. Expendable materials and safety equipment associated with working lead safe (including but not limited to safety suits, trash bags, face masks, plastic covers) may be charged to the Support-Equipment/Tools category.

Ohio’s Deferral Policy will be used in instances where the homeowner or landlord has notified the sub-grantee of lead paint issues existing or where lead poisoning has occurred to a member of the household. Referral is recommended to other programs designed to address the concerns.

Mold and Moisture

Limited water damage repairs that can be addressed by weatherization workers and correction of conditions that may create moisture and mold are allowed when necessary in order to weatherize the home and to ensure the long-term stability and durability of the measures. However, existing mold and moisture issues greater than 10 square feet cannot be addressed and must be deferred. Testing for mold to determine the type or severity is not an allowable cost. All sub-grantees are required to complete a Home Weatherization Assistance Program Mold Assessment and Release Form after the energy audit and prior to the work being started. It is expected that sub-grantee staff will document with digital photos any existing mold and mildew problem. When possible, the sub-grantee should refer the homeowner to another program that can address the issue. Ohio’s Deferral Policy will be used in instances where the remediation of the problem is beyond the scope of the weatherization program. Moisture problems that cannot be corrected within the scope of the program include, but are not limited to the following:

- Installation of a new roof;
- An enclosed crawlspace or basement that has standing water for significant periods of time due to inadequate ground or surface water drainage;
- Structures exhibiting signs of major moisture problems such as blistering paint and extensive mold/mildew on the inside of the house.

When a person’s health may be at risk and/or the work activities could constitute a health or safety hazard, the occupant at risk will be asked to take appropriate action based on severity of risk. Failure or the inability to take appropriate actions must result in deferral. Intake staff should begin the discussion with the customer as part of describing the program and what measures may be performed. The sub-grantee must be cognizant of collecting this personal information and the protections that customers have with the Health Insurance Portability and Accountability Act of 1996 (HIPAA). Care should be taken to assist if such health problems exist and, consequently, to avoid weatherization work/materials that will exacerbate the problem. Such health problems may include but are not limited to allergies to insulation materials, COPD, and asthma. A discussion between the sub-grantee staff and the customer should take place during the initial visit to explain the process for installation of all materials and determine if any activity will exacerbate the condition(s) of the occupants.

Alternative work protocols should be implemented if necessary to avoid aggravating any existing health condition. It may be necessary for the customer to leave the home during the work process. Refusal or inability to leave the home may result in deferral and/or referral to another local program, if available.

Occupants pre-existing Health Conditions

Ohio addresses occupant health conditions in the Data Collection Form. Questions asked in this form include does anyone in the household have breathing conditions (i.e. asthma or bronchitis), does anyone in the household smoke or does anyone currently have flu-like symptoms.

Occupational Safety and Health Administration (OSHA) and Crew Safety

Sub-grantees shall comply with Occupational Safety and Health Administration (OSHA) requirements for all weatherization activities which involve staff personnel. This includes the requirement that staff personnel working on the homes (crews and inspectors) will utilize the appropriate personal safety equipment when necessary.
and receive training on the use/location of safety equipment.

Related costs to train personnel in order to comply with OSHA requirements shall be charged to the Administration or the Training and Technical Assistance budget category. Related costs to purchase equipment in order to comply with OSHA requirements shall be charged to the Administration or the Support budget category. When contractors are employed by sub-grantees, those contractors shall comply with OSHA requirements as well. Sub-grantees that identify that a contractor may not be complying with OSHA requirements shall take all necessary steps to have the contractor rectify the situation, including notifying the contractor of the issue, identifying training opportunities, or terminating the contract with the contractor. Costs related to OSHA compliance for HVAC, weatherization, or other contractors hired to address health and safety issues shall be part of the bid price or job cost.

The sub-grantee is responsible for ensuring workers and subcontractors are properly trained and certified, when certification is required. ODSA will review the training certificates for OSHA and LSW compliance in conjunction with the local sub-grantee and the Ohio Weatherization Training Center. OSHA requirements are as follows:

Position OSHA 10 OSHA 30
Installer Required Recommended
Crew Leader Required Recommended
Energy Auditor Required Recommended
QCI Required Recommended
Heat Tech Non-licensed Required Recommended
Heat Tech State-licensed Required Recommended

Pests

Pest infestation, within the dwelling or in any area outside of the dwelling, where sub-grantee staff (inspectors, crews) or contractors would have to work, is cause for deferral. Pests include but are not limited to fleas, roaches, rodents, and/or bed bugs.

However, it is allowable as a tool/equipment purchase to purchase pest spray (e.g. wasp/hornet spray) as a remedy for a situation. It also is allowable for the sub-grantee to address points of access to prevent intrusion. Examples include screening of attic gable vents to keep out flying insects and installing steel wool accesses to prevent rodents from penetrating. Whole house extermination is not allowable.

Customer education must include any observed conditions of pests and associated risks.

Radon

Ohio’s policies regarding radon have been aligned with Weatherization Program Notice 11-6 and recommendations by DOE. The cost of generally abating radon is prohibited. However, the cost to test a building for the presence of radon gas is allowable.

Many counties in Ohio are considered to have high potential for radon (see [www.epa.gov/radon/whereyoulive.html](http://www.epa.gov/radon/whereyoulive.html) for a radon map of Ohio). Some weatherization measures that help mitigate the presence of radon (such as installing ground/vapor barrier on exposed dirt) are allowable and will be charged to the Health and Safety budget category. Customer education may include providing a copy of the Environmental Protection Sub-grantee (EPA) handout entitled “A Citizen’s Guide to Radon” (EPA 402/K09/001). In instances where elevated levels of radon have been identified, the energy auditor will defer weatherization measures that could exacerbate the problem. Weatherization measures that are identified as being cost-effective for the dwelling and will reduce the exposure to radon are encouraged.

Refrigerant

When a replacement refrigeration appliance is installed, the previous inefficient appliance must be removed and be properly destroyed. Contractors will properly dispose of these existing appliances and provide documentation of disposal. Appliances shall be recycled in accordance with the environmental standards in the Clean Air Act (1990), Section 608, as amended by the Final Rule. 40 CFR 82, May 14, 1993. Sub-grantee staff, appliance vendor, manufacturing facility, or other entity that is used to recover the refrigerant from the old appliances must possess an EPA-approved section 608 Type I license or an approved universal certification.

Smoke, Carbon Monoxide Alarms and Fire Extinguishers

The installation of smoke alarms is allowable and must be installed per manufacturer’s instructions. An approved carbon monoxide alarm(s) is required in every home, per ASHRAE 62.2-2016 guidance. The installation of smoke and carbon monoxide alarms must be charged to the Health and Safety budget category.

Fire Extinguishers are allowable for households when a solid fuel heating system is present (i.e. coal, wood). Only one unit may be installed into a home and must be charged to the Health and Safety category. Fire extinguishers must be installed, according to the manufacturers recommendations, be type ABC, UL listed, ≤ 10 lb. and with a permanently affixed wall bracket to receive the extinguisher. The customer must sign a written agreement to allow a fire extinguisher to be installed in the home and placed within sight of the solid fuel burning heat system when standing at the unit. The sub-grantee must discuss and provide information on the use and upkeep of the extinguisher to the customer.
**Solid Fuel Heating (Wood Stoves, etc.)**

The sub-grantee must inspect the stove, chimney and flue. Combustion zone depressurization (CAZ) is required per the SWS and NFPA 211.

Maintenance, repair, and replacement of primary indoor heating units is allowed where occupant health and safety is a concern. Maintenance and repair of secondary heating units is allowed. Replacement of secondary heating units is not allowed. This system must be operational and inspected using all SWS test protocols before any other weatherization begins.

**Space Heaters, Standalone, Electric**

Heating appliances in this category may be defined as heaters that do not have a permanent connection to electric power. Repair, replacement, or installation is not allowed. Removal is recommended. Circuitry must be checked to ensure adequate power supply for existing space heaters. These heaters are not considered a primary heat source.

Customer education must include information about the hazards associated with these types of heaters. Inspectors may defer if the customer refuses to remove heaters of this type.

**Space Heaters, Unvented Combustion**

All unvented, fuel-fired primary heating units or unvented fuel-fired water heaters that cannot be vented must be removed and replaced with properly vented units before proceeding with any weatherization work. All unvented, secondary heating units must be removed unless they conform to ANSI Z21.11.2. The sub-grantee must notify the customer/owner/authorized agent verbally and in writing of the potential health hazards of operating an unvented appliance in the post-weatherized dwelling and provide information on safe alternatives. The sub-grantee also must test the ambient air in the location of the unvented appliance.

**Space Heaters, Vented Combustion**

These units will be treated as furnaces. The SWS and Field Guide detail the diagnostic testing required during an inspection. The replacement system must be operational and inspected using all SWS diagnostic test protocols before any other weatherization begins.

**Spray Polyurethane Foam (SPF)**

Use EPA recommendations (available online at http://www.epa.gov/dfe/pubs/projects/spf/spray_polyurethane_foam.html) when working within the conditioned space of a unit when SPF fumes become evident within the conditioned space. Customers may be asked to relocate if and when fumes are evident in conditioned spaces. When working outside the building envelope, isolate the area where foam will be applied, take precautions so that fumes will not transfer to inside conditioned space, and exhaust fumes outside the home.

Testing will include checking for penetrations in the building envelope. Sensory inspection inside the home for fumes during foam application must also occur. Safety equipment associated with installation of this product may be charged to Equipment/Tools. The customer must be informed of plans to use two-part foam and the precautions that may be necessary. All weatherization staff and contractors using foam products must receive training on the proper use of these various products and understand the specification for each application type. Documentation is required of installers viewing an installation video or completing online training and verification of reading and understanding product use information. Documentation and verification of training must be maintained by the service sub-grantee. Safety Data Sheets (SDS) are mandatory for any foam product used and a thorough understanding of the temperature sensitivity of the product in use is required.

**Ventilation**

The installation of new exhaust fans and related ducting, controls, and passive air intakes that are designed to remove moisture and/or introduce fresh air to assure a safe and healthy level of air exchange is allowable as a health and safety measure. The Ohio Weatherization Training Center has developed an ASHRAE 62.2 training course based on the WAP National Curriculum. Sub-grantees are also allowed to use Training and Technical Assistance funding to hire trainers to provide this training, with approval from ODSA. Ohio has adopted ASHRAE 62.2-2016 as required by DOE. Ohio will utilize the 15 CFM de minimis as the action level where additional ventilation will be provided. **Window and Door Replacement, Window Guards**

Replacement, repair, or installation of windows or exterior doors is not an allowable Health and Safety cost but may be allowed as an Energy Conservation Measure if cost justified with a SIR of 1.0 or greater. If disturbing lead paint, sub-grantees and all contractors must follow LSW and LRRP practices and the customer must be informed of the risks of lead-based paint.

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**V.8 Program Management**

**V.8.1 Overview and Organization**

Grantee Organization

The weatherization program is administered by the Ohio Development Services Agency (ODSA), Community Services Division, Office of Community Assistance (OCA). OCA also administers the Low-Income Home Energy Assistance Program (LiHEAP), the Community Services Block Grant, the Percentage of Payment Plan...
Community Development Analysts (Administrative Monitors)  
Energy Developer (Lead Technical Monitor  
Energy Analysts 2 (Technical Monitors  

V.8.3 Monitoring Activities

Plus Program, the State Energy Plan, and the Electric Partnership Plan.

The Home Weatherization Assistance Program is directly administered by the HWAP Section Supervisor, of OCA. An additional seven (7) staff positions are dedicated to monitoring and compliance.

ODSA has 26 direct contracts with sub-grantees (Community Action Agencies (CAAs) (18); local government agencies (2); and non-profit, non-CAA agencies (6)) to implement the HWAP. These sub-grantees will ensure that HWAP services are available in all 88 of Ohio's counties. Sub-grantees are solely responsible for the quality of work and reporting requirements of the HWAP. Sub-grantees are expected to monitor the performance of contractors, crews, and non-profit partners carrying out work for the HWAP. Additionally, ODSA monitors will visit all Ohio Sub-grantees and review no less than 5% of completed units (see V.8.3 Monitoring Activities for additional details).

Traditionally, 15% of HHS-LIHEAP funds for Ohio are transferred annually to the state weatherization program. These funds follow the same rules of the DOE weatherization program, with a few exceptions based on program funding needs. The flexibility provided by these funds prevents many deferrals for Ohio customers and is vital to the continuation of a successful program.

Relationship of the Weatherization office with other units of State Government

The Deputy Chief of the Office of Community Services reports to the Community Services Chief who also oversees the Deputy Chief of Community Development which includes such programs as Community Housing Improvement Program (CHIP) and Ohio Housing Trust which are housing repair programs.

V.8.2 Administrative Expenditure Limits

Ohio Development Services Agency (ODSA) will follow the rules for administrative expenditure limits outlined in 10 CFR 440.18(e), which state that not more than 10% of any grant made to a state may be used by the Grantee and Sub-grantees for administrative purposes in carrying out duties under this part, except that not more than 5% may be used by the state for such purposes, and not less than 5% must be made available to sub-grantees by states. Ohio tracks administrative expenditures on the monthly financial reimbursement request. Also, Ohio's grants management and database software, OCEAN, prevents budgeting greater than the maximum allowable in the administration category for sub-grantees.

For sub-grantees, "administrative costs" shall be defined as those costs which a grantee incurs that are not in direct support of individual weatherization projects, but are necessary for the organization to operate the HWAP. Typical expenditures found in this category are wages, fringe benefits and related costs associated with the following functions: executive (not directly installing or supervising the installation of materials), finance/accounting, human resources, and planning. Other typical administration cost category expenditures are payroll processing costs, costs to administer health insurance programs, data processing costs, indirect costs as allowable, and bank service fees. Membership dues are considered administrative costs and not more than 25% of the cost of any membership may be charged to HWAP.

"Indirect costs" will be an allowable expenditure only when written approval of the indirect cost rate has been obtained by the grantee from the Grantee's cognizant federal agency. Indirect costs are considered Administrative costs. Audit and liability insurance costs may be pro-rated and included in separate respective cost categories only when not included in the indirect cost rate agreement.

V.8.3 Monitoring Activities

Staff Dedicated to Monitoring

ODSA employs seven monitoring staff persons (salaries paid by DOE T&TA and HHS/LIHEAP funds – see budget justification for details). Ohio has allocated 35% of DOE T&TA funds in support monitoring activities.

- Energy Developer (Lead Technical Monitor - QCI)
- Energy Analysts 2 (Technical Monitors - QCI)
- Community Development Analysts (Administrative Monitors)

Summary - Programmatic and Fiscal Monitoring

The Ohio Development Services Agency (ODSA) has an established monitoring system for evaluating sub-grantee performance regardless of funding source.

Monitoring functions will be the state's principal method for determining sub-grantee compliance, evaluating actual accomplishments against planned activities and determining the effectiveness of the program. Salaries for state monitors and the program manager are charged to the DOE Training and Technical Assistance category.
Monitoring provides objective reporting to and from Sub-grantees and makes recommendations to address program and administrative deficiencies and needs. The administrative field staff will review fiscal procedures, staffing and organization, procurement, and customer services. The technical field staff will review property management, training records, inventory, materials quality, and field work. Each sub-grantee will be visited by a technical field representative at least once per monitoring year to review no less than 5% of completed units. Each sub-grantee will be visited by an administrative field representative at least once every monitoring year to review no less than 5% of the completed unit files. Program year is defined as July 1 through June 30.

Monitoring visits are generally arranged with agencies at least two weeks in advance. Agencies are not permitted to choose the units for the visit. These are chosen by state monitoring staff based on noted anomalies or risk factors identified in previous onsite monitoring or desk monitoring, housing types, measures installed, and location. No specific monitoring schedule is set for PY 2017 at this time. In general, monitors visit one to four agencies per month to perform monitoring and/or training and technical assistance. There are a total of 26 sub-grantees in Ohio.

A job automatically fails the visit if the customer confirms the sub-grantee came to monitor the unit itself in an effort to “clean up” the job prior to the state monitoring visit.

Travel is necessary to complete the demands of the monitoring approach and federal travel rules are followed by the state of Ohio. State-owned vehicles are generally used for in-state travel unless not available or not cost-effective.

All technical monitors performing Quality Control Inspections are required to maintain the Building Performance Institute (BPI) Quality Control Inspector (QCI) credential and keep current.

Corrective Actions Procedures

Ohio's monitoring approach will include the following components:

1. Administrative review by field staff of documents and reports related to the organization, operation and performance of local sub-grantees programs;

2. Monitoring for technical compliance with standards, performance measures and applicable codes and other policies related to installation of materials; and

3. Fiscal Audit of financial stability and accountability.

Administrative Monitoring

The administrative review covers the following, at minimum: financial management systems and operations, review of previous audits and monitoring visits by both administrative and technical monitors, payroll/personnel, procurement procedures, sub-grantee or partner agency monitoring, invoicing/purchase orders compared to work orders and price list or bids, records retention, contractor compliance, customer file review, program structure, marketing, general program operations and flow of services, review of production goals, information technology needs assessment, and gathering of success stories.

The administrative monitoring also includes review of annual grant applications, reports based on monthly financial and production information, and compliance with required written procedures. Problems noted through this review are communicated to the sub-grantees for their subsequent explanation and/or resolution. Customer files have been standardized in Ohio since 2010. Administrative monitors also check for adherence to both existing and new policies and procedures and provide training upon request or requirement when sub-grantees fail to meet expectations in one or more area. The Administrative Monitoring Quality Assurance Checklist for field review is attached, along with a copy of the monitoring instrument.

Technical Monitoring

Technical monitoring reports are completed within 30 days of the visit to the sub-grantee whenever possible. These reports will summarize the findings and, when necessary, direct the sub-grantee to take specific actions to correct issues of noncompliance and/or to develop a plan of action to improve performance. Reports are sent to sub-grantee Board Chairpersons and Executive Directors who must respond within 30 days and provide evidence or assurance, as appropriate, of all actions taken. A 15-day extension for the response is allowable with permission from the Ohio Development Services Agency (ODSA). Monitoring reports include a reminder that suspension of funding is possible if a sub-grantee fails to respond within the allowable timeframe. Technical monitoring also includes review of annual grant applications, analysis of tools/equipment inventories, and compliance with required written procedures.

ODSA has developed and implemented procedures to ensure state monitoring is increased if a sub-grantee’s pass rate for all monitored units on a single visit falls below the established acceptable pass rate of 60%. Based on the Site Visit Inspection Summary reports, any sub-grantee falling below the visit pass rate of 60% any time during the program year will receive additional technical monitoring of its completed units for the next two consecutive quarters. A minimum of three completed units will be monitored during each of these follow-up visits. During the period in which the sub-grantee pass rate is below 60%, ODSA will work with that sub-grantee with training and technical assistance and/or the Ohio Weatherization Training Center to address the problematic areas causing the low passage rate. Under this system, units pass or fail based on specific parameters. Homes monitored that have one or more health and safety violations (any health and safety finding is considered a major finding) or a combination of four or more minor or moderate findings, fail the job. More than 60% of homes monitored at an onsite visit must pass. Sub-grantees who do not meet this requirement are considered in a Continuous Improvement Plan and are visited quarterly by state monitoring staff. These visits may be regular monitoring visits to check progress or to provide training or technical assistance to the program. The sub-grantee is considered in a Continuous Improvement Plan until at least 60% of units pass the monitoring during two consecutive technical monitoring visits. Any findings are documented in the site monitoring checklist and detailed in a written report to the sub-grantee.

Audit

The audit reviews compliance with federal, state and local rules, regulations, laws and policies related to the receipt, expenditure, and reporting of grants. An audit is
Effects of Termination.

Conducted in accordance with procedures prescribed by ODSA to satisfy federal and state sub-grantee monitoring requirements and those expressed or implied in Grant Agreements. Audits are reviewed by ODSA and results are incorporated into the weatherization risk assessment of each sub-grantee.

Sub-grantees that exhibit significant problems, actions or circumstances that increase the risk of fraud, waste and abuse of grant funds are subject to additional ODSA review. Specific audit procedures would be performed at the request of the Office of Community Assistance.

An audit report is issued by the ODSA Audit Office within 30 days after the last day of audit fieldwork. The sub-grantee must respond to any questioned costs, legal compliance findings or material weaknesses stated in the report. Each response must describe the actions the sub-grantee has taken or will take to preclude the findings from reoccurring. Unresolved findings could result in disallowed costs, withholding of funds, suspension of funds, or other legal actions.

Tracking and Analysis

Ohio uses Montrak, an Excel-based worksheet, to track monitoring results, including dates for the visit, issuance of the report, and final resolution. Ohio also maintains a database that tracks and consolidates findings on technical visits by measure and type. Reports show both individual sub-grantee and statewide results, which are shared with the training center to guide training and technical assistance. When needs are identified, training and technical assistance is directed to address those needs.

Training and Technical Assistance is carried out by the Ohio Weatherization Training Center (OWTC) for formal, required courses and by state technical and administrative staff. Triggers for Training and Technical Assistance include reports by ODSA, DOE or another oversight group; request by the sub-grantee; or determination for additional training. The OWTC maintains a database of trained staff and the details of training completed and status (pass, fail, in progress, etc.). Sub-grantees are responsible for tracking the credentials and training needs of their personnel and maintaining appropriate certifications. State monitors have access to the training database and check credentials of the personnel at sub-grantees they monitor. ODSA requires updated training in the monitoring report when compliance issues are found.

Customer education is required for every eligible household and sub-grantees submit, each year with their Grantee/Provider Management Plan, a list of trained staff persons who have completed the Customer Education course offered by OWTC and date the course was completed. Customer education is recorded on the Energy Savers Partnership Plan form, with one copy in the customer file and the other staying in the home with the customer for future reference.

Removal of Sub-grantee

Ohio completes an annual Risk Assessment of sub-grantees to evaluate performance and to determine if a sub-grantee is administering an effective weatherization program. The Risk Assessment evaluates sub-grantees based on administrative, technical and fiscal management.

A draft of the Risk Assessment was sent to current HWAP sub-grantees for input and suggestions. Attached is the final version of the Risk Assessment after reviewing comments and feedback from sub-grantees.

A rating of “high risk” for two consecutive years on the annual Risk Assessment performed by ODSA, would result in a competitive proposal process for sub-grantee’s territory after the current contract expires. Sub-grantee.

Should the Risk Assessment rating result in a competitive proposal process for any sub-grantee’s territory, Ohio will proceed in accordance with 10 CFR 440.15.

Additionally, the grant agreement with local sub-grantees includes the following language regarding termination:

I. Effects of Termination.

i) Procedure for Termination. If Grantor determines as provided in this Section 15 to terminate this Agreement, Grantor shall provide a written Notification of Intent to Terminate to the governing board of Grantee by certified mail. The Notification of Intent to Terminate shall identify in sufficient detail the charges for such proposed action, the sections of statutes, rules, regulations or contractual obligations that Grantee is charged with violating; and a statement of Grantee’s right to request a public hearing on the proposed termination by making a written request within 30 days of the date of the mailing of the Notification of Intent to Terminate. Such notice shall also inform Grantee that Grantee may be represented by an attorney or by such other representative as designated by a majority of the governing body of Grantee. When any Notification of Intent to Terminate sent by certified mail is returned because of inability to deliver, the notice required shall be sent by ordinary mail evidenced by a certificate of mailing to the chairperson of Grantee. Grantor may terminate this Agreement in whole (“Complete Termination”) or in part (“Partial Termination”) pursuant to Ohio Administrative Code Rules 122:12-1-02 to 122:12-1-04, and cease payment accordingly. In the event of Partial Termination, Grantor and Grantee shall enter into an “Amended Grant Agreement” reflecting a revised Project.

ii) Termination. In the event of Termination of this Agreement, all property and finished or unfinished documents, data, studies and reports purchased or prepared by Grantee under this Agreement shall be disposed of according to Grantor’s directives, and Grantee shall be entitled to compensation for any unreimbursed expenses reasonably and necessarily incurred in the satisfactory performance of this Agreement. Grantee shall incur no new obligations after the date of the termination of this Agreement, and shall cancel as many outstanding obligations as possible. Within 60 days after Termination of this Agreement, Grantee shall provide Grantor with a Closeout Report setting forth the total expenditure of the Grant Funds by Grantee and the status of the Project at the time of termination. Upon review of the Closeout Report, Grantor shall determine whether or not Grantee shall be required to refund any portion of the Grant Funds. The refund decision will be within the sole discretion of Grantor. In no event shall Grantee be required to refund an amount in excess of the total Grant Funds awarded under this Agreement as a result of any breach of this Agreement.

iii) Effect of Termination. Notwithstanding any of the provisions of this section, Grantee shall not be relieved of its responsibility for damages sustained by Grantor by virtue of any breach of contract by Grantee, and Grantor may withhold any reimbursement to the Grantee for the purpose of set-off until such time as the exact amount of damages due Grantor from Grantee is agreed upon or otherwise determined.
Existing sub-grantees also may elect to voluntarily relinquish the weatherization program. This must be completed in writing and signed by an authorized representative of the sub-grantees. This also would necessitate a competitive process to reassign the territory through a Request for Proposals. A public hearing is required when a new permanent sub-grantee is announced.

In any case when the territory is relinquished by a sub-grantee or a sub-grantee is removed, existing sub-grantee(s) may be requested to act as a temporary emergency sub-grantee in order to ensure continuation of services without interruption to eligible customers.

V.8.4 Training and Technical Assistance Approach and Activities

Training and Technical Assistance

Ohio’s weatherization network receives Tier 1 and Tier 2 training from the Ohio Weatherization Training Center (OWTC). The OWTC is accredited by the Interstate Renewable Energy Council (IREC) to train Home Energy Professionals for the Quality Control Inspector certification. Additionally, all curriculums for the Retrofit Installer, Crew Leader, and Energy auditor have been aligned with the Job Task Analysis for each certification.

Requirements for training and certification are developed in accordance with U.S. DOE WAP guidelines and regulations and those of the Ohio Standard Work Specifications (SWS) and Ohio Weatherization Field Guide - SWS-Aligned Edition (Field Guide).

The OWTC received IREC accreditation for Retrofit Installer, Crew Leader and Energy Auditor in September 2016. Because Ohio uses a series of courses which is expanded upon for each position (installer, crew leader, energy auditor, inspector), all curriculum has been previously reviewed by IREC for the Quality Control Inspector certification; therefore, the approval process for the remaining certifications should be quick process. The following illustrates the course list for each weatherization position and how they are integrated to provide a consistent training message that meets the JTA requirements:

2017 HWAP training and certification requirements attached.

Training and certification requirements are reviewed on an annual basis by state technical and administrative staff in collaboration with the training and technical staff at the OWTC. A committee comprised of state technical staff, monitors, OWTC instructors, subject matter experts, and HWAP sub-grantee staff provides additional recommendations to the training and certification requirements. This allows program and industry stakeholder input to be continuously integrated into the training ensuring integrity in program technical training and certification requirements. The OWTC works to ensure that the training and technical requirements meet or exceed program standards as well as support quality outcomes including, but not limited to a skilled, knowledgeable and qualified workforce which translate to quality work standards being implemented in the field.

Contractors are required to complete applicable trainings prior to starting work and are not charged for the cost of registration for any courses required in the HWAP Program Year 2017 Training and Certification Requirements (attached). Per diem and other costs are the responsibility of the contractor. Local agencies are advised to secure a retention agreement in exchange for the training that would stipulate that contractors will work in the Program, at a minimum, for a specific amount of time and should be in correlation to the cost of the training provided.

Monitors check training databases to ensure that all staff are up-to-date on required training. Any findings are recorded in monitoring reports and agencies are required to respond. Any job submitted must have a final inspection completed by a Quality Control Inspector (QCI) starting July 1, 2015. Any job submitted without proper documentation of the final inspection and credentials of the QCI will be disallowed until a qualified QCI reviews the job and completes the inspection. Depending on the severity of the findings, the monitor may recommend suspension of the QCI if quality issues are consistently found in inspected work. Costs also may be disallowed on work not meeting the Ohio Standard Work Specifications. New weatherization contractors must complete required training prior to the start of work (Combustion for Contractors, Basic Weatherization Tactics, Lead RRP). All other training may be completed within 180 days of date of hire or contract signature unless otherwise specified.

New HVAC contractors must complete Combustion for Contractors training prior to the start of work. Insulation contractors must complete Basic Weatherization Tactics and Lead RRP prior to the start of work. All other training may be completed within 180 days of date of hire or contract signature unless otherwise specified.

For a complete list of trainings in the Retrofit Installer Series, Crew Leader Series, Energy Auditor Series, Quality Control Inspector Series, and Heat Technician Series, see the HWAP Program Year 2017 Training and Certification Requirements (attached).

ODSA plans to do a program evaluation in PY2017 to determine the energy savings achieved by sub-grantees. ODSA plans to issue an RFP for the evaluation.

In-field technical assistance is provided to sub-grantees through a variety of means from both the ODSA and the OWTC. A referral for training and technical assistance can be initiated through a variety of means including, but not limited to:

(1) Results of an onsite monitoring visit or report by ODSA, DOE or other oversight or evaluation entity;

(2) Request by the sub-grantee;

(3) Supplemental training required by ODSA or recommended by OWTC.
The OWTC maintains a training database for all workforce employed or previously employed by an Ohio sub-grantee or approved private contractor. The database has the capacity to track student progress in detail including student transcript of credentials, course completions, pass/fail one evaluations, and related certifications. While sub-grantees are responsible for maintaining training and certification compliance for their workforce/personnel, the OWTC student database has limited capacity to support notification to sub-grantees of pending recertification and/or training to avoid noncompliance in training and technical requirements. ODSA monitoring staff has access to the OWTC database to validate credentials of the personnel at HWAP sub-grantees or request a report directly from the OWTC. Through continued collaboration, the OWTC and ODSA ensure that sub-grantees remain in compliance in training and technical requirements and related certifications.

Customer education is required for all eligible households. Customer education is recorded on the Energy Savers Partnership Plan form or equivalent, with one copy in the customer file and the other staying in the home with the customer for future reference. All Energy Auditors and Quality Control Inspectors are required to complete an eight-hour customer education training through OWTC that helps them develop skills for customer interaction and explain the changes in the home post-weatherization.

A. ASSESSMENT OF TRAINING AND TECHNICAL ASSISTANCE NEEDS

1. ODSA staff analyze data on a variety of financial, production, and weatherization retrofit information. Trends indicating extremes in production and/or completed weatherization measures will be noted and tracked for appropriate follow-up.

2. Onsite visits provide firsthand, observable evidence for Training and Technical Assistance.

3. State-funded weatherization skills training will be matched closely to techniques and program policies to ensure consistent and effective implementation. A Training and Student Database with a master list of all HWAP staff and their associated training records has been developed to highlight the needs of the individuals working within the program and electronic notices can be sent when continuing education training is required.

B. PROVISION OF TRAINING AND TECHNICAL ASSISTANCE

The OWTC is an Interstate Renewable Energy Council (IREC) accredited training provider. The OWTC provides a multi-faceted approach to workforce training and development. Classroom instruction, written and visual materials, hands-on instruction, and field experience provide a wide range of options to accommodate varied learning styles for adult learners.

Funding for training activities provided through the OWTC is part of the Training and Technical Assistance allocation to the state of Ohio. Funding of the OWTC is at an annual level that will be determined at the time of the DOE allocation. The OWTC has established training facilities at locations regionally in Ohio ensure that travel costs are minimized to sub-grantees and approved private contractors. In addition to the funding from the DOE HWAP allocation, the OWTC has diversified its funding revenue through procurement of federal, state, and private foundation grants and private contracts with contractors and utility providers. This diversification of funding streams has allowed the OWTC to leverage those funds in bringing additional training and technical resources to the Ohio HWAP Provider Network.

The training schedule is updated on a quarterly basis and made available to the Ohio HWAP Provider Network online through the training center’s website at www.coainc.org/owtc.org.

OWTC has more than 30 years of experience in the development and implementation of weatherization training standards at both the state and federal level.

OWTC staff participates in ongoing working advisory groups with ODSA to update technical standards and refine curriculum. The OWTC is responsible for creating training materials including technical documents, technical drawings and charts, instructor and student manuals, and digital media presentations. The training professionals also design and build the props and learning tools utilized for specific hands on instruction. An example of this would be the full “prop house” within the main facility allowing simulated diagnostic testing and hands-on training to be conducted in a controlled environment.

Courses in building science, retrofit energy efficiency measures, heating unit inspection, heating unit repair, and lead safety are provided with health and safety training integrated into each module. Each of the training professionals on staff are required to become Building Performance Institute (BPI) certified in Analyst and Envelope Professional and several hold additional certifications, including BPI Proctor status.

The feedback from various oversight entities at all levels, including but not limited to inspector general reports, federal and state monitoring, and federal and state audits, are used to develop or modify current policies and to direct program training and technical assistance.

Training and certification requirements are provided by the OWTC and include the competencies, knowledge, skills, and abilities for a skilled workforce necessary to perform quality work in the field as described in the Job Task Analyses identified by NREL. Please see attached coursework and curriculum that details requirements for each weatherization position.

Continuing Education Units will be made available to sub-grantees and workforce to ensure knowledge, skills, abilities and technical competencies remain current. Courses offered reflect a commitment to ongoing education and skill-building as well as provide opportunities to have access to new technologies and technical advances in theory, lab and field practice. The continued expansion of available continuing education units also supports the workforce in holding other credentials in the industry that support higher outcomes in the field.

Training and Technical Assistance funds are available to support locally initiated training and to make effective use of the training center. To assure coordination of
training activities, all Training and Technical Assistance funds shall be itemized and budgeted into the following categories:

- Costs for travel and per diem for attendance at the OWTC for Training and Technical Assistance workshops, seminars, meetings, or classes.
- Supplemental training not offered by the OWTC for HWAP staff. Training must relate directly to the attendee's HWAP job duties.
- Purchase of training materials, including training and testing costs, necessary to meet OSHA safety standards.
- Percentage of salary for a staff person responsible for ensuring that training, safety requirements and needs are met and to oversee in-house weatherization training.
- Travel for HWAP staff to attend conferences, meetings, and seminars.

Other Training and Technical Assistance Initiatives in conjunction with the Training and Technical Assistance provided by ODSA staff, the OWTC, and local Training and Technical Assistance programs, ODSA shall continue to assure an effective exchange of program information through the following:

- Active involvement with the HWAP Policy Advisory Committee and Technical Sub-Committee;
- Promotion of regional meetings initiated by Regional Representatives of the Policy Advisory Council at which management, technical and general informational topics will be discussed according to current need;
- Scheduling statewide weatherization meetings;
- Updates to program management guidance, including Operations Memos, Information Updates and revisions to the Policies and Procedures Manual, when necessary;
- Continued meeting of the working group consisting of ODSA and OWTC staff to develop new training approaches and refine the existing courses to best meets the needs of the network; and
- Encouragement of information exchange and skills transfer among sub-grantees on an informal basis.

Additionally, appropriate representation is recommended at national conferences and DOE-sponsored events such as Home Performance Coalition (HPC), the National Weatherization Conference, National Association for State Community Service Programs conferences (NASCSP), Energy Out West and/or other regional meetings.

C. ATTENDANCE/TRAINING REQUIREMENTS

Attendance at state-sponsored trainings may be required based on identified needs to support remediation of program deficiencies and/or to ensure competence in specific areas. In such cases, sub-grantee attendance will be required as a matter of program compliance. Failure to attend any scheduled training without due notice may result in a service charge to the sub-grantee, per the cancellation policy of the OWTC. This service charge is not an allowable Training and Technical Assistance expense and must be paid by unrestricted/non-federal funds.

Training and Technical Assistance funds may be used a maximum of three (3) times for Quality Control Inspector certification exam process (written and/or field).

D. ASSESSMENT OF STATE TRAINING AND TECHNICAL ASSISTANCE ACTIVITIES

Assessment of activities will be accomplished by review of the following:

- Local training activities and local Training and Technical Assistance expenditure reports;
- OWTC monthly attendance and quarterly activity reports;
- Quarterly review of the OWTC to measure and track training effectiveness;
- Onsite monitoring of local programs;
- Review of local Training and Technical Assistance curriculum and activities.

All attendees receive a certificate for successfully completing each course showing milestones met in their professional development plan, which are maintained by sub-grantees and reviewed by state monitors upon request. Feedback from sub-grantees is used to direct training and policy, and all monitoring reports are shared with OWTC staff. Additionally, a work group has been formed that meets quarterly to discuss training issues and requirements and to direct and improve the process of training our weatherization network. Ohio maintains a list of sub-grantees who meet targets for air leakage, and offer training and technical assistance to sub-grantees that fail to meet expectations for reducing air leakage. In this way, sub-grantees are compared for effectiveness in energy efficiency. Ohio also captures state monitoring activities for training and technical assistance. Both a pre-visit form and post-visit form are required, which include pertinent information regarding the visit (attached). Post-visit, agencies are sent an online survey asking them to rate the effectiveness of the training. Ohio will continue to improve operations, provide effective services and develop new ways to excel at training the network of providers and weatherizing homes.

The OWTC will track and report to the Section Supervisor, Weatherization, on a quarterly basis the following performance metrics:

- Delivery of occupational skills training leading to industry-recognized certifications
- Delivery of in-field and/or on-the-job training
- Student to instructor ratio in classroom, lab, and field
- Student evaluative outcomes
- Delivery of academic services
- Delivery of work-readiness/supportive services/employment retention efforts
- Employer input for occupational skills training
- Student input for occupational skills training
V.9 Energy Crisis and Disaster Plan

Ohio’s ability to leverage additional funds has allowed most sub-grantees to meet the emergency demands of their customers without significant changes to the yearly plans. In the event of a declared natural or manmade disaster, Ohio will allow sub-grantees to assist their eligible customers with weatherization funds to the extent that the services are in support of eligible weatherization work. The allowable expenditures under the Home Weatherization Assistance Program (HWAP) are limited to include the following:

The cost of incidental/additional repairs to an eligible dwelling unit, if such repairs are necessary to make the installation of weatherization materials effective, per 10 CFR 440.18(d)(9);

The cost of eliminating health and safety hazards, which is necessary before the installation of weatherization materials, per 10 CFR 440.18(d)(15).

In the event of a declared federal or state disaster (those in which the President of the United States or the Governor of the state of Ohio has declared the event an Emergency), sub-grantees may return to a unit previously reported as a completion to the Department of Energy that has been “damaged by fire, flood or act of God and repair of the damage to weatherization materials is not paid for by insurance to be re-weatherized, without regard to date of previous weatherization”, per 10 CFR 440.18(f)(2)(ii). Local authorities must deem the dwelling unit salvageable as well as habitable and the damage to the materials must not be covered by insurance or other form of compensation. In these cases, the work can be addressed without prior approval or any special reporting.

The sub-grantee may use HWAP funds to perform functions to protect the federal funding investment. Such activities may include: securing weatherization materials, tools, equipment, weatherization vehicles, or protection of local sub-grantee weatherization files and records during the initial phase of the disaster response. The use of HWAP funds to pay weatherization personnel to perform relief work in the community as a result of a disaster is not allowable. The use of weatherization vehicles and/or equipment may be used to assist disaster relief activities; however, the HWAP must be reimbursed.

Reprioritization of households located in a disaster area is permissible as long as the households are determined eligible for the weatherization, meet one of the priorities described in 10 CFR 440.16(b), and are free and clear of any insurance claim or other form of compensation resulting from the damage incurred from the disaster. Documentation must be placed in the customer file.