

U.S. Department of Energy
Weatherization Assistance Program (WAP)
STATE PLAN / MASTER FILE WORKSHEET
Grant Number: SE0001852, **State:** TN, **Program Year:** 2025
Recipient: State of Tennessee

Attachment 5
DE-SE0001852.0000

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

Countable income and income exclusions will follow WPN 25-3, or the most current version.

For a dwelling to be eligible for weatherization services, it must be occupied by a household who meets one of the following criteria:

1. Income Eligible – Total annualized income of the household residing in the dwelling to be weatherized is at or below 200 percent of the poverty level determined in accordance with the with the most current criteria established by the Director of the United States Office of Management and Budget, or
2. Categorically Eligible – The household has a member who has received cash assistance payments under one of the following state or federally funded programs:
 - Supplemental Nutrition Assistance Program (“SNAP”)
 - Low Income Home Energy Assistance Program (“LIHEAP”)
 - Supplemental Security Income (“SSI”) – issued through Title XVI of the Social Security Act
 - Families First/Temporary Assistance for Needy Families (“TANF”) – for head of household
 - Woman, Infants, and Children benefits (“WIC”) – for households with 3 or fewer members
 - Housing Choice Voice/Section 8 Rental Assistance
 - Select U.S. Department of Agriculture (USDA) Programs per WPN 25-4

All applicants must retain eligibility to be considered for weatherization and will need to be recertified on an annual basis until weatherization work has commenced.

For Subgrantees using contracted workers, the commencement date is determined to be the date the contract for services has been signed. For Subgrantees using in-house crews, this date is determined as the first date a measure is installed.

The application and supporting documentation will be reviewed and verified by the program administrator.

Describe what household eligibility basis will be used in the Program

Any household meeting either income or categorical eligibility would be eligible to receive weatherization benefits by the Weatherization Assistance Program (WAP).

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

The applicant must be a U.S. citizen, or legal alien. Documentation of citizenship is required for every applicant, without regard to race, religion, gender, ethnicity, or national origin.

When an applicant declares themselves an alien, agencies will utilize the Systemic Alien Verification for Entitlements (“SAVE”) database for verification and maintain proof of eligibility in the client file.

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

Each client file must contain an application from the client that contains the required demographics and income for the entire family living in the residence, in addition to containing evidence provided by the Subgrantee that the client is eligible to receive WAP services. This evidence may include, but is not limited to, a memorandum from a third-party certification source stipulating the income levels of the family or source documentation for each income source listed on the

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application. These documents can be stored electronically or retained in hard copy for each client.

The documentation must be maintained in the client file and made available for inspection by Subgrantee and THDA.

Describe Reweatherization compliance

Weatherization is specific to a building, not the applicant. Dwelling units weatherized (including dwelling units partially weatherized) with WAP funds, or under other Federal programs, are eligible for weatherization 15 years after the date such previous weatherization was completed. Completed date is based on the date that the job passed QCI inspection. Dwellings not meeting this criteria may still be eligible if:

- A federal or state natural disaster was declared for the area in which the unit is located, and;
- The building was damaged by fire, flood or act of GOD during this natural disaster, and;
- Repair of the damage was not covered by insurance or other forms of compensation, and;
- The unit has been deemed salvageable by local authorities.

Priority is to be provided to homes that have never received weatherization services over those who are requesting re-weatherization except for those impacted by a natural disaster. The current resident would have to apply for WAP and meet eligibility requirements. Any building that is re-weatherized must have a new energy audit that identifies the specific measures for the home that met cost saving requirements or are necessary energy related health and safety measures.

The re-weatherization of dwelling units is subject to a 10% cap. No subgrantee will use more than 10% of its funding level for labor, materials, and program support to re-weatherize eligible dwelling units.

Describe what structures are eligible for weatherization

Pursuant to 10 CFR 440.1, the weatherization program is to increase the energy efficiency of dwellings owned and/or occupied by low-income families. The applicant must provide income documentation satisfactory to the Subgrantee that demonstrates the household meets eligibility requirements.

Structures eligible for weatherization include single family, mobile homes, manufactured housing, and with THDA approval, small (2-4 unit) multifamily buildings. Multifamily buildings with 5+ units may be eligible with THDA approval.

All structures must be stationary and have a specific mailing (street) address. Campers and non-stationary trailers are not eligible. The building to be weatherized must be the primary residence of the applicant.

Describe how Rental Units/Multifamily Buildings will be addressed

Rental Units

As a condition of eligibility and before any rental dwelling unit can be weatherized, the building owner/landlord must agree to have the building weatherized. A Landlord Agreement must be signed by the building owner, or his authorized agent, and a fully executed copy maintained in the client file.

The applicant is to be provided a copy of the agreement for their records. There are separate Landlord Agreements for single-family and multi-family buildings. A copy of these agreements can be found in Chapter 18.

When signing this agreement, the landlord agrees to the following:

1. The benefits of the weatherization shall accrue primarily to the lessee;
2. The rent for the property identified above shall not be raised for a period of one year (three years for multi-family buildings) from the completion date of the weatherization work, unless the increase is demonstrably related to matters other than the weatherization work performed. This rent freeze remains in place for a period of one year (three years for multi-family) from date of completion of the weatherization work, even if the applicant above no longer resides in the property;
3. The Owner (or authorized agent) agrees that the lessee of the property identified above will not be evicted without legal cause (non-payment of rent, etc.) for a period of one year from the date of the completion of the weatherization work;

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4. If a complaint regarding a rent increase or eviction action is received by the subgrantee from the lessee of the property identified above, the Owner (or authorized agent) agrees to immediately provide the subgrantee, upon request, written information that the terms of this Agreement have not been violated;
5. No undue or excessive enhancement shall occur to the value of the property identified above;
6. There is no known plan for government acquisition or clearance of the property within 12 months of its weatherization under the WAP;
7. Permission is granted for the subgrantee to conduct or to make arrangements for the following activities:
- (a) Survey and inspection of building inside and outside;
 - (b) Installation of weatherization materials as authorized;
 - (c) Supervision of installation;
 - (d) On-site inspection of all completed work; and
 - (e) Such other particulars as may be attached to this Agreement;
8. The terms of this Agreement shall be binding on the parties hereto, their heirs, executors, administrators, representatives, successors, and assigns; and
9. If this Agreement is not adhered to by the Owner (or authorized agent), the cost of weatherization shall be reimbursed by the Owner to the subgrantee and returned to the WAP.

Multifamily Units

A building that has multiple (two or more) living units under a single roof is considered a multi-family building, regardless of if renter or owner occupied. Living units are defined as having a dedicated entrance, as well as complete, independent living facilities for one or more persons including provisions for living, sleeping, eating, cooking and sanitation.

A single unit within a multi-family building cannot be weatherized as the entire building must be considered when providing weatherization services. The entire building must be addressed, including all common areas and residential living space, even if a unit is not occupied by an eligible household.

Subgrantees have the option to obtain client eligibility from each unit within a multifamily building, or they have the option to utilize the occupancy rule. Before services can be provided, the multi-family building must be determined to meet minimum eligibility standards regarding the number of units with eligible applicants. These standards are:

Building Type	Number of Units	Type of Multifamily	Stories	Eligible Dwelling Minimum
Duplex	2	N/A	N/A	50%
Triplex	3			66%
Quadplex	4			50%
Low-rise multi-family	5 or more	Small	3 stories or less	66%
High-rise multi-family	25+	Large	More than 3 stories	66%

Unoccupied Units

Dwelling units in the building must be income eligible units; unoccupied units must become eligible dwelling units within one hundred eighty (180) days under a federal, state, or local government program for rehabilitating the building or making similar improvements to the building.

Unoccupied units at the time of eligibility determination cannot be used to meet the minimum occupancy standards, although they are counted in the total number of units within the building. If the minimum occupancy eligibility standards are not met, then no unit in the building may receive weatherization services under the program.

Subgrantees are required to submit a method for tracking the unoccupied units to THDA for review and approval.

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Describe the deferral Process

Subgrantees may elect to defer a dwelling from receiving weatherization services where structural and health and safety hazards exist for subgrantee staff, contractors, clients, or any other support staff. Deferrals may be assessed due to the following:

Household Conditions

- The client has known health conditions that prohibit the installation of insulation and/or other weatherization materials.
- Initiation of eviction or foreclosure proceedings for the property will require deferral of weatherization services. In the event the household is evicted, or foreclosure of the property is completed, the job will be terminated, rather than deferred.
- The client is uncooperative, abusive, or threatening to the crew, subcontractors, auditors, inspectors, or others who must work on or visit the house.
- Illegal activities are being conducted in the dwelling unit.

Dwelling Conditions

- Evidence of substantial and persistent infestations of rodents, insects, and other vermin.
- The building structure or its mechanical systems, including electrical and plumbing, are in such a state of disrepair that they cannot be repaired reasonably.
- The house has sewage or other sanitary problems that would further endanger the client and weatherization installers if weatherization work is performed, and repair is beyond the scope of reasonable cost justification.
- The house has been condemned or electrical, heating, plumbing, or other equipment has been “red tagged” by local or state building officials or utilities.
- Moisture problems are so severe that they cannot be resolved.
- Dangerous conditions exist due to high carbon monoxide levels due to combustion appliances and cannot be reasonably resolved.
- The extent and condition of lead-based paint in the house would potentially create further health and safety hazards were to be disturbed.
- Homes using un-vented gas heaters as a primary heating source are not eligible for services until suitable measures have been accomplished to minimize the health and safety risks associated with un-vented heating systems. If the client/landlord refuses the removal of un-vented gas heaters, the job would be terminated without services provided.

Program Limitations

- Health and Safety funding has been temporarily exhausted, and weatherization work cannot proceed without addressing the associated health and safety issues that would be necessary to effectively perform the work or as a result of the weatherization work to be performed.
- Based on the energy audit, the estimated job cost to complete the work exceeds the amount of estimated energy savings that would be returned to the customer. We are unable to perform weatherization work currently.

Documentation of Deferral

A copy of the deferral form must be retained in the client file, documented in WAPez, and shared with the client, and owner/landlord. The deferral form must be filled out completely and signed by the energy auditor and the Subgrantee must verify that the applicant was notified. The deferral form must include:

- Clear and concise description of the problems encountered in the home and action required to alleviate the issue before weatherization can proceed.
- Date of deferral
- Any condition that could impact the household’s health and/or safety.
- Timeline of expected remediation.
- Agency Point of Contact for follow-up

The subgrantee must track all deferrals to determine if timely action has been taken to alleviate the circumstances which prevented the weatherization from occurring. If the client is unable or unwilling to make the necessary repairs, or if other resources are unavailable to assist with the repairs within a reasonable timeframe, the subgrantee may opt to terminate the application.

Referrals

Repairs necessary to mitigate deferrals should attempt to be handled by the applicant first, or the property owner depending on the type of deferral.

Subgrantees are expected to pursue alternative funding to reduce the occurrences of deferral and establish open lines of communication with as many other funding sources as possible so that referrals can occur in an efficient manner.

The following is a list of potential funding sources to help remedy situations in the home:

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- U.S. Department of Housing and Urban Development (HUD) - HOME Program
- HUD – Community Development Block Grant
- U.S. Department of Health and Human Services – Community Services Block Grant
- U.S. Department of Agriculture - Rural Economic Community Development
- State-funded housing and rehabilitation programs
- Low-income program funds provided by local utilities
- City-funded housing and rehabilitation programs
- Donations or financial participation from landlords
- Donations from local churches or community groups
- Donations from local businesses, non-profit organizations, or local associations

If the applicant, or building owner, is unable to mitigate the deferral, but is willing to allow the necessary repairs to be done, the dwelling may be referred for use of Weatherization Readiness Funds.

Weatherization Readiness Funds (WRF)

WRF is intended to aid in making homes weatherization ready by addressing necessary repairs that have resulted in a deferral and ultimately, to minimize the number of terminations. WRF can only be used on dwellings that will receive weatherization services following the deferral mitigation. Priority for WRF should be given to applicants that have already been deferred in a service area.

WRF is solely to be used for deferral mitigation and the funding source cannot be used to supplement regular weatherization work.

Examples of repairs eligible for WRF usage: structural, plumbing, electrical, and roofing issues, pest infestation, or other issues THDA deems appropriate.

Examples of eligible repairs include, but are not limited to:

- Mold Remediation
- Pest Infestation
- Roof Repair/Replacement
- Asbestos Remediation
- Structure Repair
- Plumbing repair (including sewer/septic repair)
- Electrical Upgrade or Repair
- Leak Repair

Examples of repairs or deferral reasons not eligible for WRF usage:

- Building for sale or foreclosure
- Remodeling work in process that prohibits weatherization
- Health may be negatively affected by installation
- Refused installation of weatherization measure
- Illegal activity concerns
- Threatening or uncooperative behavior
- Refusal of ASHRAE 62.2 2016 required ventilation
- Refusal to remove unsafe combustion appliances
- WRF may not be considered for deferrals due to funding limitations

WRF Requirements

Weatherization Readiness Funds average cost per job is \$15,000. THDA will track WRF expenditure rates and statewide ACPU.

Units receiving WRF must result in a completed unit, defined as, “a dwelling on which a DOE approved energy audit or priority list has been applied, and weatherization work has been completed.”

WRF work is expected to be completed within a reasonable time. Reasonable time is defined as 45 days from the approval of the WRF proposal with weatherization work expected to begin within 90 days of the completion of WRF work.

All contractors hired to perform the WRF repairs must be licensed for the work they are being hired to perform. This may be verified at Department of Commerce & Insurance Administration License Roster Search (tn.gov).

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Pre and post photographs are required of all measures addressed under this program. Subgrantees must ensure that their QCI has confirmed that the WRF work was completed as called for in the client file.

Subgrantees will conduct 100% inspections on all dwellings that have received WRF, either upon completion of WRF work or during QCI.

WRF Process

Weatherization Directors, Program Managers and Energy Auditors can refer deferrals for use of weatherization readiness funds. Once a deferral has been identified, and the recommendation for WRF use has been made, the Subgrantee will prepare and submit a WRF Proposal Form to THDA.

1. Energy audit results in a deferral.
2. Subgrantee will estimate the repair costs and determine if costs fall within the guidelines of WRF.
3. Subgrantee prepares WRF Proposal Form along with supporting documentation and sends via email to their assigned THDA WAP coordinator.
4. THDA will review proposals and determine if additional documentation is needed, then issue an approval or denial. Revisions can be submitted to THDA when scope of work has changed or exceeded original quote by more than 10%. THDA will approve or deny revision requests.
5. Subgrantee ensure work is completed prior to weatherization. Completed weatherization ready work will be defined as repairs completed and is primer/paint ready.
6. Subgrantees will submit for reimbursement via the Invoice Workbook, using the line item for WRF. Supporting documents must include a copy of the approved proposal, any applicable revisions, a contractor invoice, before/after photos of the repair.

WRF Reporting

Subgrantees must track and report to THDA the following for all approved WRF proposals.

- Copy of Approval WRF Proposal including:
 - Site ID
 - Dwelling type and year built
 - Documented cause for deferral;
- WRF Work Order
- WRF Total Cost, with breakdown of materials and labor
 - Including contractor invoice
 - Procurement documents should be available upon request
- Date WRF was completed
- Other funds utilized, if applicable

V.1.3 Definition of Children

Definition of children (below age): **6**

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.

Tennessee does not have any federally or state recognized tribes. Any client that is a member of a tribal organization will be treated the same as any other eligible applicant.

V.2 Selection of Areas to Be Served

Weatherization funds will be allocated annually based on the relative need for weatherization assistance by low-income persons, in accordance with 10 CFR Part 440.14(b)(ii). Initial funding allocations to subgrantees will be based on the percentage of the State's low-income population in each county.

THDA currently has 13 subgrantee agencies comprised of Community Action Agencies, Human Resource Agencies and local government agencies serving 95

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counties. Each subgrantee has a service area that consists of one or more counties. Each county will be allocated funding based on the percentage of low-income population that resides within that county. THDA reserves the right to reallocate funding amongst subgrantees based on performance and need throughout the year.

In the event that an entity fails to execute a contract or cannot carry out the interest of the state to serve as a Subgrantee, or if THDA finds that a subgrantee selected to undertake weatherization activities under this part has failed to comply substantially with the provisions of the Act or this part and should be replaced, such finding shall be treated as a finding under [§ 440.30\(i\)](#) for purposes of [§ 440.30](#).

- Tennessee may terminate financial assistance under a subgrantee agreement for a grant period only in accordance with established State procedures that provide to the subgrantee appropriate notice of the State's reasons for termination and afford the subgrantee an adequate opportunity to be heard.
- Prior to the effective date of the termination of eligibility for further participation in the program because of failure to comply substantially with the requirements of the Act or of this part, a subgrantee shall have the right to written notice of the basis for the enforcement action and the opportunity for a public hearing notwithstanding any provisions to contrary of [10 CFR 600.26](#), to [600.28\(b\)](#). A notice under this paragraph shall be mailed by the Support Office Director by registered mail, return-receipt requested, to THDA, and other interested parties. To obtain an administrative hearing, the subgrantee must request a hearing, with prior notice, in the election letter submitted.
- A subgrantee shall have 20 days from the date of receipt of a decision to file a notice requesting administrative review. If the subgrantee does not timely file such a notice, the decision shall become final for THDA.

THDA reserves the right and will work to identify another organization to serve in this Subgrantee role. The process for identifying a subgrantee to serve the noncovered area will follow [§ 440.14](#) & .15 by the procedure below:

THDA shall ensure that:

1. In selecting a subgrantee, preference is given to any CAA or other public or nonprofit entity which has, or is currently administering, an effective program under this part or under title II of the Economic Opportunity Act of 1964, with program effectiveness evaluated by consideration of factors including, but not necessarily limited to, the following:
 - a. Each subgrantee is a CAA or other public or nonprofit entity;
2. THDA will notify all current subgrantees of the opportunity and identify the noncovered counties.
 - a. Subgrantees will have the opportunity to submit a Letter of Interest.
 - b. The Letter of Interest will include details regarding capacity, desired noncovered counties to support.
 - c. Letters of Interest will be reviewed by THDA staff to determine best fit.
 - d. The subgrantee must express their experience and performance in weatherization or housing renovation activities;
 - e. The subgrantee's experience in assisting low-income persons in the area to be served; and
 - f. The subgrantee's capacity to undertake a timely and effective weatherization program.
 - g. The quality of work performed by the subgrantee;
 - h. The number, qualifications, and experience of the staff members of the subgrantee; and
 - a. The ability of the subgrantee to secure volunteers, training participants, public service employment workers, and other Federal or State training programs.
 - j. The extent to which the past or current program achieved or is achieving weatherization goals in a timely fashion;
 - k. A scoring rubric will be created to select the replacement agency.

If no current Subgrantee is selected, THDA reach out to county officials in those counties noncovered and seek feedback identifying an organization. All applying CAA or other public or nonprofit entity will follow item(s) #2 – A to K (noted above) in the application process.

Each Subgrantee(s), CAA or other public or nonprofit entities that submits a Letter of Interest will be considered. Letters of Interest will be posted for 10 days for public comment to be received during a public hearing conducted pursuant to [§ 440.14\(a\)](#) and other appropriate findings regarding:

- The Subgrantee(s), CAA or other public or nonprofit entity will be selected to serve the noncovered area within 10 days of the public hearing and execute a contract with THDA and begin service immediately to the noncovered areas.

In the event that no organization can be identified to serve the noncovered area, the funds allocated to the noncovered area will be reallocated to subgrantees covering the remaining counties in Tennessee.

V.3 Priorities

Priority Points

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The purpose of the Priority Points System is to identify those households most in need and prioritizing services to those households. The system provides a fair and consistent means of evaluating and selecting clients for service under WAP while ensuring funds are spent in the counties where they were allocated.

Priority is established at the point the initial application is approved and is valid for 12 months. Priority points should be updated if eligibility recertification is necessary. Households with the oldest application date will be listed before a household with the same number of assigned points. If there is still a tie, the household with the greatest number of elderly individuals will be given priority. In addition, re-weatherization jobs will be served after all new applicants with the same number of priority points.

Priority Point Criteria

Federal program regulations require priority be given to households that include vulnerable population members, households identified as a high residential energy user(s) and those with a high energy burden.

Vulnerable populations are defined as the elderly (age 60 or older), persons with disabilities (self-attestation permitted), and families with children (under age 6) at the time of application. Points for household member(s) are based on the individuals' age at the time the application is approved and may fluctuate if recertifications are required.

Additionally, priority points may be assigned if a household's energy burden is 8.01% or higher and/or if a household's annual energy costs exceed \$1,900.00.

The maximum number of points a household can have is **75**, unless the WAP eligible dwelling is damaged and as such through a federal or state declaration of disaster. The chart provides the points available to be assigned under each category. The subgrantee must utilize this chart when determining the number of priority points assigned to a specific job.

PRIORITY POINT ASSIGNMENT

75 Maximum Points Available

Vulnerable Household Members 50 Points Max	
Household Includes a Member with Following Characteristic	Points
Elderly (age 75+)	20
Elderly (age 60-74)	15
Disabled	15
Child under 6 years of age	15

*If multiple elderly members reside in the HH, use the age of the oldest member to determine countable points.

Energy Burden 15 Points Max	
% of Income Used for Home Energy Costs*	Points
19.01% or higher	15
15.01% - 19%	10
8.01% - 15%	5
8% or less	0

*Calculated by dividing the annual energy costs by the total countable annualized income for household.

High Residential Energy User 10 Points Max	
Household Annual Energy Costs**	Points
\$3,000 or more	10
\$1,900 or \$2,999	5

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\$1,899 or less

0

**If energy costs are included in the rent, determine the annual energy costs by dividing the total energy costs for the building by the total number of building units.

Priority Points for a Multi-Family buildings

The number of units will be calculated separately from single family units and as follows:

1. Determine the number of points for each unit occupied by an eligible household.
2. Divide that number by the total number of units in the multi-family building.
3. The result is the number of priority points for that building.

Additional Points in Disaster Areas

Applicants in a disaster area may be provided priority services, with 15 additional points available to disaster victims. These points are added to the points already provided to vulnerable household members as part of the priority point system. The household must include a member who is elderly, disabled, or under age six before the additional points can be awarded. Additional priority points will only be provided upon verification of a FEMA assigned number for that client/residence for the specific disaster.

Waitlist

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Waitlists are to be maintained and managed per county, in order of highest to lowest priority points. Priority points will determine which applicants will receive service based on the county's waitlist.

Subgrantees may not serve all applicants with the highest number of points (at an agency level) if it results in a county's production goal not being met. If production goals are not met in a county, Subgrantee will need to document outreach efforts and seek THDA approval before continuing to serve other counties.

Prioritizing Applicants with Braided Funds

Subgrantees are permitted to use multiple funding streams in the Weatherization program and must remain compliant with all policies defined in DOE WPN 22-9. If additional funds are sourced through an alternate grant, those funds can be braided with WAP to alleviate the limitations of the ACPU and SIR restrictions.

Subgrantees are permitted to assist applicants with lower priority points if other funding sources are available. This policy is limited to no more than 50% of units based on production goals within a county. An approved Waiver from THDA will be required before the client has been moved from the waitlist to approved, and before the energy audit is scheduled. LIHEAP Weatherization is not considered an alternative funding source for braiding of funds.

V.4 Climatic Conditions

Tennessee has a generally temperate climate, with warm summers and mild winters. However, the state's varied topography leads to a wide range of climatic conditions. The westernmost part of the state, between the Mississippi and Tennessee Rivers, is a region of gently rolling plains. The Central Basin makes up middle Tennessee, and lies between the Tennessee River to the west, the hilly Highland Rim to the north and the Cumberland Plateau to the east. The Cumberland Plateau, with an average elevation of 2,000 feet, extends northeast to southwest across the State in a belt 30 to 50 miles wide, overlooking the Great Valley of East Tennessee. The Great Valley, which runs parallel to the Cumberland Plateau on the west and the Great Smokey Mountains on the east, is a funnel shaped valley varying in width from 30 to 90 miles. The Great Smokey Mountains lie along the Tennessee and North Carolina border, with peaks ranging from 4,000 to 6,000 feet.

Tennessee's topography contributes to the variance of temperature, with an average of three degrees Fahrenheit decrease per 1,000 feet increase in elevation. As a result, higher portions of the State, such as the Cumberland Plateau and the mountains in the eastern portion of the state, have lower average temperatures than those found in other parts of the state. Across the state the average annual temperature ranges from 62 degrees in extreme southwest portion to 45 degrees at the top of the highest peaks in the east. Statewide, the average annual temperature is 58 degrees, with a winter average of 39 degrees and a summer average of 76 degrees. Average annual precipitation in Tennessee is 53 inches, with the greatest rainfall occurring in the winter and early spring. Snowfall varies and is more prevalent in the eastern portion of the state.

Source: www.degreedays.net

Station: NASHVILLE INTERNATIONAL AIRPORT, TN (86.69W,36.12N)

Station ID: KBNA

Fahrenheit-based heating degree days with a base temperature of 65F

Month starting	HDD 65
1/1/2024	864.6
2/1/2024	432.1
3/1/2024	305.3
4/1/2024	151.4
5/1/2024	21.2
6/1/2024	5.4
7/1/2024	0
8/1/2024	1.3
9/1/2024	11.4
10/1/2024	148.7
11/1/2024	292.1

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12/1/2024 596.6

Total 2,830.1

Fahrenheit-based cooling degree days with a base temperature of 65F

Month	CDD
starting	65
1/1/2024	0
2/1/2024	11.6
3/1/2024	33.5
4/1/2024	119.7
5/1/2024	234.9
6/1/2024	431.2
7/1/2024	507.3
8/1/2024	492
9/1/2024	287.3
10/1/2024	137.9
11/1/2024	37.1
12/1/2024	0

Total 2,292.5

V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials

All work done is consistent with DOE approved energy audit tool and Appendix A. Tennessee is approved to use LEDs, replace Refrigerators, and Heat-pump water heaters. All energy conservation measures (ECM) and related incidental repairs for a specific unit will be established through the use of the Weatherization Assistance Program Audit tool ("NEAT, MHEA") with the exception of the measures that have been identified as low cost or no cost. Health and Safety measures are not required to be cost justified.

All measures and incidental repairs performed on projects must meet the specifications, objectives and desired outcomes outlined in the Standard Work Technical Guides and Materials Specifications for Home Energy Upgrades, State and THDA policies and procedures. As needed, updates may be provided in the form of technical assistance memorandums, technical assistance contractors, or through reference to DOE established guidance. The measures identified are the more common measures. This list is not meant to be all inclusive.

The current Tennessee Specific Standard Work Specifications is available within the WAPez platform and linked on THDA's website ([Tennessee Housing Development Agency | Weatherization Assistance Program Administrators](#)).

THDA contracted with Saturn Resource Management in PY18 to create a Tennessee specific field guide, this was updated in 2021. Tennessee's current SWS Field Guide is DOE approved. The field guide is readily available for Agency, Auditor, and Contractor use via the WAPez online system.

Ensuring Quality Work from Quality Control Inspectors, Energy Auditors and Contractors

All units must receive a final inspection by a THDA approved Quality Control Inspector ("QCI"). A THDA approved QCI must have a current QCI certification from the Building Performance Institute and must meet all other DOE and THDA requirements.

QCIs are required to ensure weatherization work has been completed and meets the current technical guidance and SWS. QCIs must attend all mandatory weatherization trainings. QCIs must retake any classes or trainings that are missed within six (6) months of the original training date, or they are no longer eligible to conduct QCI visits until they take that/those course(s). A QCI's performance is monitored by THDA or THDA's T&TA provider.

If there are repeat findings from a QCI, additional training will be required. If after successfully passing additional training the QCI continues to have repeat findings, THDA will not accept any final inspections signed by the QCI and the QCI is required to complete the following steps:

Step 1: Technical Assistance - THDA will set up technical assistance and training sessions with the QCI, THDA staff, and our T&TA provider.

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Step 2: Additional Training - If the QCI continues to have findings after the technical assistance and training sessions, the QCI may be required to attend and pass mandatory additional training.

Step 3: Removal from the program - If the QCI is unable or unwilling to perform to the standard set by THDA and DOE, they will be removed from WAP and no longer able to work in the program for a minimum of two program years. After the completion of the two-year period an inspector may request to be reinstated into the program. The request to be reinstated must include the corrective action steps that were taken and justification. The request will be approved or denied by THDA.

THDA reserves the right to reject work from a poor performing QCI, Energy Auditor or contractor.

The Subgrantee, contractors, and auditors are able to view and download the TN WAP Technical SWS within WAPez via their login credentials.

By signing the WAP Contract and the Weatherization Services Contract the agency and contractor verifies that all weatherization work including audits/testing, installation of energy conservation measures, health and safety measures, incidental repair measures, and final inspections will be performed in compliance to the THDA WAP Manual, Tennessee Weatherization Field Guide, National Standard Work Specifications, and State and Federal requirements.

All work must comply with State and Federal WAP requirements and the THDA Standard Work Specifications.

If a contractor repeatedly fails to meet program expectations, they will be subject to the following corrective action:

Step 1: Counseling - The Subgrantee will set up a counseling session with the contractor, local agency staff and THDA T&TA provider.

Step 2: Additional training - As a result of counseling, the contractor must attend and pass mandatory additional training.

Step 3: Removal from the program - If the contractor is unable or unwilling to perform to the standard set by THDA and DOE they will be removed from WAP and no longer able to work in the program for a minimum of two program years.

After the completion of the two-year period a contractor may request to be reinstated into the program. The request to be reinstated must include the corrective action steps that were taken and justification. The request will be approved or denied by THDA.

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Air Sealing

Air sealing work will be guided by the use of a blower door and digital manometer. The most effective infiltration reduction efforts typically involve sealing leaks between the conditioned space and the unconditioned areas found in the attic or crawl space. The contractor performing the weatherization work will be required to perform necessary air infiltration measures until the minimum air reduction targets have been met. Air sealing items identified by the auditor must be completed. If the items identified to be sealed fail to result in the target being met, additional sealing is required. The subgrantee must still ensure SIR requirements are being met.

American Society of Heating, Refrigeration and Air Conditioning Engineers (ASHRAE) 62.2- 2016 standards will be followed when performing air sealing. If the structural integrity of the unit prohibits the use of the blower door, it may be that the unit is deferred. Living conditions that prohibit the use of the blower door may require deferral until such conditions can be remedied.

All installed ASHRAE fans switches must be labeled at either the switch or the breaker box. This is a requirement for both demand-control and continuous operation.

Attic Insulation

The amount of insulation installed will be based upon what amount is cost-effective based from the audit tool. Attic insulation may be recommended by the audit tool depending upon the existing insulation level, fuel type, climate region, heating source, and other factors.

Air sealing attics should precede attic insulation, and this may require removing existing insulation that currently prevents effective air sealing. Attics with structural issues that are beyond the scope of the WAP to address may not be able to be insulated in full or at all.

Attic insulation always settles. Cellulose usually settles 10% to 20% and fiberglass settles 3% to 10%. Blowing attic insulation at the highest achievable density helps minimize settling while minimizing air movement within the insulation.

Attic insulation should include lid insulation, weatherstripping and fasteners for the access. Attic insulation may also require incidental repairs such as but not limited to repairing minor roof leaks, patching ceilings and installing a new attic access. The Tennessee Weatherization Field Guide contains information regarding the proper procedures to follow for attic preparation and installation standards.

Floor Insulation

The audit tool determines the appropriate R value and need for insulation for a specific unit. The Tennessee Weatherization Field Guide defines standards and procedures for floor insulation.

Excessive moisture from frequent rain or high water tables can enter a house through the crawl space and cause mold, mildew and/or structural damage. A vapor barrier is not recommended when bulk water issues are observed unless the vapor barrier can remain sealed and intact above any bulk water intrusion.

Wall Insulation

Wall insulation is determined by the audit tool. Walls that are already fully insulated or solid masonry, concrete, concrete block, or wood will not be insulated.

If any of the following conditions exist, then the wall cavity should not be insulated:

- Active knob and tube wiring is present in the wall cavity
- Wall cavity contains HVAC duct, wall furnace or heater
- Wall cavity is next to a fireplace or chimney without sufficient clearance
- Wall cavity space is connected to an unprotected pocket door cavity
- Other situations that may result in a hazardous situation or where the wall cannot be properly prepared due to unique structure of the home.

Other Insulation

Insulation of water heaters, water pipes, and HVAC ductwork are allowable weatherization measures.

A signed and dated insulation certificate from the contractor is required for every installation (floor, wall, attic) and must comply with 16 CFR 460.17. A copy of the certificate must be posted at the property, provided to the client or property owner, and retained in the file.

Domestic Hot Water (DHW)

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Replacement with an energy star rated heat pump water heater is permitted as an ECM. Solar water heaters are not approved. Repairs may be justified under H&S.

All replacements must:

- Qualify as an ECM
- Must be similarly sized as the original unit that is being replaced
- Have an insulation blanket installed unless prohibited by the manufacturer or the insulation fails to meet minimum SIR values

Heating System Maintenance, Repair and Replacement

All heating furnaces will be evaluated, including any duct work present. A furnace may be solid fuel (wood or pellet stove heaters), electric or combustible fuel, such as natural gas, propane, or kerosene. If the heating source is wood or pellet, the related chimney must also be evaluated. Maintenance and repair will always be preferable to replacement of an existing unit. If the audit tool determines that replacement is recommended, a Manual J/S calculation must be performed and retained in the client file.

Replacement furnaces must be Energy Star certified, or equivalent.

Cooling System Maintenance, Repair and Replacement

An energy star rated cooling system may be installed as an ECM. If the audit tool determines that replacement is recommended, a Manual J/S calculation must be performed and retained in the client file. The original unit must be removed from the home, and properly disposed of in accordance with The Clean Air Act, USC Title 42, Section 7671g.

Maintenance and limited repairs are also allowable.

Unvented Space Heaters

If the unit targeted for weatherization services has an unvented gas or liquid fuel space heater that serves as the primary heat source for the home, this unit must be replaced as part of the weatherization services provided. The home cannot be weatherized under the Weatherization Assistance Program if the client refuses the removal of the primary unvented space heating source or if funding is not available to remove and replace the unit. The unit is to be replaced with a vented, code compliant heating system that is appropriately sized for the home.

If the unvented gas or liquid fueled space heater is a secondary heat source, it may remain in the home provided it complies with the International Residential Code (IRC) and the International Fuel Gas Code (IFGC). Removal is required, except as secondary heat, unless the unit conforms to ANSI Z21.11.2. Units that do not meet ANSI Z21.11.2 must be removed prior to weatherization but may remain until a replacement heating system is in place. DOE funds may not be used to replace any unvented space heater that serve as a secondary heat source.

Refrigerator

Refrigerator replacements are allowable as an ECM with a SIR of 1.0 or greater. Replacement refrigerators must be Energy Star Rated or equivalent. The existing refrigerator must be removed from the unit and disposed of properly.

Electric Baseload/Lighting

Lighting upgrades are included with the TVA Energy Saver Kits which are not funded by DOE but are provided to all WAP Clients.

Doors and Windows

All doors and windows will be evaluated as part of the energy audit. Only those doors and windows that are part of the building envelope can be repaired or replaced, provided the individual unit meets the necessary cost saving factor to support the decision. Replacement of doors and windows must be cost justified through the energy audit tool. In rare instances, doors and windows may be replaced as incidental repairs if associated with an energy conservation measure and meets the definition of an incidental repair. These circumstances must be well documented in the client file utilizing both written and photo explanation.

General Heat Waste Measures

The Tennessee Weatherization Assistance Program will allow the installation of the following measures that are typically acknowledged to be cost effective:

- Water Flow Controllers, including low flow shower heads

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- Furnace or Cooling Filters, up to a one-year supply
- Weatherstripping, caulking, plugging, glass patching and other similar measures primarily used to address air infiltration.

General Heat Waste measures are limited to \$100 of material cost per unit. Such measures may be installed by the energy auditor or the contractor. It is not necessary to have these measures recommended by the Weatherization Assistant audit tool, nor is a SIR of 1.0 or more required.

Incidental Repairs

An incidental repair (IR) is defined as necessary for the effective performance or preservation of newly installed weatherization materials, but not part of a standard installation. IR installations must be associated with a specific ECM or group of ECMs. IRs must be justified by written and photo documentation in the client file. IR costs must be included in the SIR calculation of the total package of weatherization measures. Dwellings that require more than minimal repair may be beyond the scope of weatherization and require deferral. Subgrantees are encouraged to review WPN 19-5 for more information.

Permits and Code Compliance

It is the responsibility of the Subgrantee to ensure the contractor obtains all necessary permits and is in compliance with codes for the area in which the work is being performed. Copies of permits will be included in the client file.

Bulk Purchases

THDA will consider Subgrantee request for the bulk purchase of WAP related materials and equipment. This consideration will serve in part to expedite completion of weatherization work which could otherwise experience a lag due to supply chain issues when ordering materials and equipment. Purchasing in bulk should reduce per unit pricing.

Subgrantees are required to follow their internal, state, and federal 2 CFR 200.317326 procurement policies. Examples of considerations such as the type of material or equipment request Subgrantee/State average cost per unit, past and current Subgrantee performance, and local supply chain issues will be taken to ultimately approve or deny the purchase request.

Field guide types approval dates

Single-Family: 11/9/2021
Manufactured Housing: 11/9/2021
Multi-Family:

V.5.2 Energy Audit Procedures

Audit Procedures and Dates Most Recently Approved by DOE

Audit Procedure: Single-Family

Audit Name: Other (specify)

Tennessee is approved to use the Weatherization Assistant (NEAT/MHEA) audit tool by DOE. Approval dates are July 5, 2021 through July 5, 2026.

Approval Date: 7/5/2021

Audit Procedure: Manufactured Housing

Audit Name: Other (specify)

Tennessee is approved to use the Weatherization Assistant (NEAT/MHEA) audit tool by DOE on mobile homes. Approval dates are July 5, 2021 through July 5, 2026.

Approval Date: 7/5/2021

Audit Procedure: Multi-Family

Audit Name:

Approval Date:

Comments

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Audit Tool Approval

THDA received audit tool approval on April 28, 2021. THDA received verification from DOE on 3/20/2018 to use WAPez developed by TVA which is integrated with NEAT/MHEA for energy audits. Use of NEAT/MHEA WAweb has been approved until 7/5/2026.

Priority lists for Low-Rise Multifamily (LRMF) (5+ units, 3 stories or less) have been approved until 7/5/2026.

THDA reserves the right to use other audit tool(s), after it has been approved by DOE, in the event NEAT/MHEA is not available.

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The following is the contract clause to ensure the Tennessee Weatherization Field Guide is used:

The Grantee shall perform all WAP activities and carry out all fiscal responsibilities in accordance with THDA WAP Manual and THDA SWS Field Guide and subsequent technical guidance, all applicable U.S. Department of Energy regulations and policies, and all applicable Office of Management and Budget (OMB) circulars (collectively, the "Program Requirements").

Energy Auditors (EA)

Energy audits will only be conducted by energy auditors that meet minimum qualification standards as defined by THDA. An energy auditor may be a Subgrantee employee or a contractor of the subgrantee. Tennessee requires every home to have an energy audit performed prior to weatherization services being provided in order to determine the appropriate measures for that specific unit.

Subgrantees are encouraged to hire Energy Auditors that already have completed BPI Certification. It is required for an Energy Auditor to be BPI Energy Auditor Certified within a reasonable timeframe determined by a THDA-approved training plan. All Energy Auditors must have a BPI Energy Auditor Certification and meet the other requirements of DOE and THDA WAP.

Quality Control Inspectors (QCI)

All Quality Control Inspectors must have a BPI QCI Certification. Any individual hired by a subgrantee as a QCI must be certified within one year of employment. All final energy audits/ QCI inspections must be conducted by a QCI certified auditor that meets all other DOE and THDA WAP requirements.

Single Family

The audit tool approved by DOE for use on single family units in Tennessee is the Weatherization Assistant (NEAT/MHEA). DOE approval of the tool was obtained on July 5, 2016. Each Energy Conservation Measure (ECM), except air sealing (WPN 13-05), must have a Savings-to-Investment Ratio (SIR) value of 1.0 or greater in order to be cost justified. Additional diagnostic tests will be conducted, as necessary, for the specific unit.

The energy audit recommended measures are used to build the work order for the unit. Based on DOE WPN 19-4, if minor measures must be removed from the work order due to costs exceeding the cap per unit, those measures with the lowest SIR value will be removed first (with the exception of infiltration reduction measures), along with any incidental repair that is tied to the deleted ECM from the work order. It is to be known, DOE WPN 19-4 defines major measures as: air / duct sealing (outside the thermal boundary) and wall / attic / floor insulation. These major measures *cannot* be removed from a work order *if* they are determined cost effective as defined by the audit tool. Whenever measures are added or removed, the SIR value must be recalculated to ensure both individual ECM and cumulative SIR values meet minimum standards. The actual cost of the measure as bid must also be compared to ensure that SIR requirements continue to be met.

Manufactured Homes

The audit tool approved by DOE for use on mobile home units in Tennessee is the Weatherization Assistant (NEAT/MHEA). The audit tool approved by DOE for use on single family units in Tennessee is the Weatherization Assistant (NEAT/MHEA). DOE approval of the tool was obtained on July 5, 2016.

Multifamily Buildings

Any multifamily building containing 5 or more units (including all living units and common spaces) will have the weatherization work prioritized through the WAP-IIJA grant. Projects will be sent to DOE for review and approval until DOE grants Tennessee the ability to approve multifamily projects.

For 2-4 unit properties, Subgrantees will submit projects to THDA for approval.

Weatherization Contractors

Weatherization work will be performed through a combination of contract or crew-based workers. Most Tennessee subgrantees contract weatherization work on a per job basis. Currently, one subgrantee has hired a weatherization crew, three subgrantees have begun hiring and training, and other agencies are contemplating the option as well.

All contractors and subgrantee crews must meet the training and certification requirements listed in the THDA WAP Manual. All contractors and crews must be approved by THDA. Only contractors with a current Tennessee General Contractor or Home Improvement Contractor license and who meet the current requirements listed in the WAP Manual may be allowed to bid. Licensed contractors who have three or more years of experience in weatherization work may be exempt from training course, at the option of the subgrantee, provided the contractor submits documentation of their experience. Contractors must ensure employees are also in compliance with federal and state requirements, as applicable. All contractors must carry an

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active liability policy in an amount as approved by the subgrantee. Any contractor currently on the federal Excluded Parties List System of suspended and debarred contractors may not participate. Subgrantees have the option to impose additional contractor qualifications.

If the building to be weatherized includes five or more family units, or if the building exceeds three stories, only those contractors with an active Tennessee Commercial Contractor's license may qualify to perform the work. All other contractor requirements still apply.

Provided the contractor meets the above qualification, the subgrantee has the authority to determine those contractors they wish to approve to bid on the weatherization work awarded through their agency. The subgrantee must ensure they have a sufficient number of approved contractors to ensure competition.

Contractors must sign the "Contract to Provide Services Under the Weatherization Assistance Program." This agreement is provided by the grantee to the subgrantee as a contract for the contractor on each WAP job. By signing the "Contract to Provide Services Under the Weatherization Assistance Program" the contractor performing the work is ensuring quality work and that all terms of the contract will be followed.

Weatherization Work Job Awards

Subgrantees using weatherization contractors will follow a THDA approved bid process, with the job being awarded to an agency approved contractor. All awards must comply with Federal and State procurement requirements. Subgrantees have the option to negotiate the costs or work to be performed when the bid exceeds the maximum amount permitted under the program, following the priority list (Recommended Measures Report) and procedures for removal of measures. The job is not considered to be "awarded" until there is a fully executed contract that includes the scope of the work to be performed for that specific unit.

In the event the qualified contractor withdraws their bid, the subgrantee may award the contract to the next contractor, with the same policies and procedures to be applied as described above. If the contractor defaults on the contract and fails to perform the work – either all or in part – the agency will have to reevaluate the work that remains to be performed and rebid the job.

Contractors who make an error in the submission of their bid have the option to honor the price as quoted, or to withdraw their bid. Under no circumstances will the bid error be corrected and the cost of the work to be performed increase as a result of the contractor's error when preparing their submitted bid.

Change Orders

Occasionally, there may be additional weatherization work identified after the initial audit or after the work has been awarded to a contractor. Change orders must be approved by the subgrantee prior to the additional work being performed by the contractor.

V.5.3 Final Inspection

Tennessee currently has 9 certified Quality Control Inspectors. There is a mix of staff and contracted QCIs in Tennessee. Some agencies do not have the capability to have multiple QCI inspectors/auditors on staff. Agencies that use the same auditor for their audits and inspections will have monitoring increased to at least 10% of units. Tennessee allows Subgrantees to use QCI certified inspectors on a contract basis. QCI performing the final inspection cannot also have performed weatherization work on the home.

Once the contractor has notified the subgrantee that all work on a unit has been completed, the subgrantee will assign a qualified Quality Control Inspector to perform an inspection. Every WAP unit must receive a final inspection by a certified QCI ensuring that all work meets the minimum specifications outlined in state and national standard work specifications and in accordance with 10 CFR 440. The purpose of the inspection is to ensure that all required measures (ECMs, incidental repairs, health and safety items) were installed in the building in accordance with program guidelines. The quality control inspection is driven by the initial energy audit, work order, the awarded contract that specifies the work to be performed, and any change orders that have been approved for the job.

If the QCI determines that all required work has not been installed, or has not been installed in accordance with program standards, the contractor will be notified of the necessary corrections to be made. The contractor will not be paid additional funds for correcting the original work and bringing it up to program standards. Once corrected, another inspection will be conducted. All completed work must be inspected by a BPI certified, and agency approved, QCI and passed before the job can be considered completed.

Contractors will not be paid until work has passed inspection.

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Every client file must have a final QCI inspection form that certifies that the unit had a final inspection and that all work met the required standards. The form must be signed by the client and the certified QCI. If a unit has received both a final inspection and has also been monitored by THDA, two certification forms will be available in the client file, one for each inspection.

Subgrantees have the option to incorporate contractor penalties related to failed inspections or a contractor's failure to complete the work by the timeframe outlined in the contract. If a penalty is applied, the payment made to the contractor will be reduced by that amount. The reduced cost for the weatherization work will be invoiced to THDA, with the amount of the applied penalty defined.

If the final inspection cannot be performed due to the client's unwillingness to allow the auditor access to the home, or other circumstances beyond the agency's control, the job can be closed after sufficient effort has been made to conduct a final inspection. In this situation, the contractor may be paid, but the job cannot be counted as a completed unit for purposes of meeting production goals.

If there are repeat findings from the same QCI the Subgrantee will be notified and the QCI will be placed on a corrective action plan including increased training. Disciplinary actions are listed in WAP Manual. Sub-grantees have the flexibility to set their own policies for energy auditor probation, suspension and termination, and are strongly encouraged to do so. The provided Energy Auditor Contract Template in the WAP Manual can be modified to include any sub-grantee specific penalty situations and fiscal penalties. Any contracted energy auditor that is suspended or terminated by a sub-grantee due to poor performance, fraud or abuse will be reported to the State Office.

V.6 Weatherization Analysis of Effectiveness

Every unit will have an energy audit performed utilizing the WAPez software which runs the Weatherization Assistant (NEAT/MHEA) tool to identify the most effective measures for that particular home. In addition, Tennessee plans to continue the partnership with the Tennessee Valley Authority (TVA) to evaluate the impact the weatherization work had on the energy costs for the home. This partnership will require THDA to provide TVA with pre and post weatherization data for the unit and TVA provides energy saving kits to all WAP clients. TVA will evaluate the measures installed, the pre weatherization energy costs and the post weatherization energy costs. There will be no cost to the program for this evaluation.

THDA will also conduct a cost analysis across the state in order to provide updates to our measure cost library. The analysis will include obtaining contractor actual cost and averaging them for the state. The cost averages will be compared to market costs and adjusted as needed.

The results of the Quality Assurance Reviews are incorporated into training plans that are to be provided both statewide and on an agency basis. Continued monitoring of progress and work performed will inform the next steps in development of training.

V.7 Health and Safety

Per 10 CFR Part 440, allowable energy related health and safety actions are those actions necessary to maintain the physical well-being of both the occupants and/or weatherization workers where:

- Costs are reasonable as determined by DOE in accordance with the Grantee's approved Grantee Plan; AND
- The actions must be taken to effectively perform weatherization work; OR
- The actions are necessary as a result of weatherization work.

Each program year, Subgrantees will be allocated a maximum amount for health and safety expenditures. The H&S allocation may only be used for allowable health and safety measures, as required by the specific home and in accordance with DOE guidelines and the approved Health and Safety Plan.

Federal regulations do not mandate a separate health and safety budget cost category, THDA has opted to budget health and safety costs as a separate category and, thereby, exclude such costs from the ACPU calculation. This separate category also allows these costs to be isolated from energy efficiency costs in program evaluations.

Funds may only be spent in homes where weatherization work is being performed.

Unspent and Depleted H&S Funds

Any unspent health and safety funds that are eligible for carryover and are not utilized within a Program Year will convert to the Program Operations budget

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category. If a unit requires health and safety measures to perform weatherization, and the subgrantee has depleted their annual allocation, the job will have to be deferred.

Savings-to-Investment (SIR) Requirements

Tennessee does not require that health and safety measures meet minimum SIR requirements; activities assigned to the health and safety budget category do not have to be cost justified by the energy audit. The same items assigned to incidental repair, weatherization material, or installation cost categories must be cost-justified. H&S funds should not be used when the repair is a component of an ECM.

Determining Cost for Health and Safety Measures

All health and safety measures must be included in the work order and bid with the ECM/IR package of measures for the specific job. Health and Safety measures are subject to the same procurement requirements as ECMs and incidental repairs. H&S expenditures are generally limited to 15% of the WAP ACPU.

Minor Versus Major Repair

THDA has defined minor repair as \$1282.05 any repairs exceeding this amount are considered a major repair and fall outside the scope of weatherization.

Radon Requirements

The Subgrantee must incorporate the Radon Requirements listed within WPN 22-7 and adhere to the Buildings Assessment of Radon Reduction Interventions with Energy retrofits Expansion Final Report.

The Subgrantees must also update their email notifications to use the Radon Informed Consent Form which provides documentation that the occupant(s) (and landlord if applicable) have been informed of any potential hazards associated with radon in weatherized dwellings.

The form must minimally contain the following:

1. An explanation on the potential small risk of increasing radon levels when building tightness is improved.
2. A list of precautionary measures WAP will install based on EPA Healthy Indoor Environment Protocols.
3. Some of the benefits of Weatherization including energy savings, energy cost savings, improved home comfort, and increased safety; and
4. Confirmation that EPA's A Citizen's Guide to Radon was received and radon related risks were discussed with the client.

V.8 Program Management

V.8.1 Overview and Organization

The Tennessee Housing Development Agency (THDA) has been designated by the Governor as the State's administering agency for the Weatherization Assistance Program (WAP), effective with PY2012. Local government agencies, community action agencies, human resource agencies, not-for-profits, and other public entities, will contract with THDA to provide weatherization assistance in each of Tennessee's ninety-five counties. THDA also administers the Low-Income Home Energy Assistance Program (LIHEAP) and up to 10% is made available to WAP subgrantees to supplement weatherization efforts.

All funds available to Tennessee's WAP will be administered in accordance with DOE rules and regulations and State policies and procedures. Local agencies will be required to adhere to these and other applicable federal regulations, including the Accounting Manual for Recipients of Grant Funds in Tennessee, published by the State of Tennessee's Comptroller of the Treasury; and the Tennessee Weatherization Assistance Program policies and procedures.

All allocations to local agencies are subject to Congressional appropriation (and/or Federal Court orders) and subsequent allocations to the State by the DOE. In the event anticipated Federal funds are not obtained and continued at the levels indicated in this Plan, the Department reserves the right to reduce all agency allocations accordingly. In no event shall funds be provided for reimbursement of WAP agencies where federal funds are not available for such purposes.

The Weatherization Assistance Program is managed within the Community Services Division at THDA, which includes other programs such as LIHEAP, ERA and ESG. The division is supported by an Internal Audit division (for financial monitoring) and Compliance and Assets Management division (for programmatic

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monitoring).

THDA has contracted with Community Housing Partners to aid with technical monitoring and training needs.

V.8.2 Administrative Expenditure Limits

In compliance with 10 CFR 440.18(e), THDA will retain 5% of available funds for administrative purposes and subgrantees will receive 10% administrative funds. An additional 5% will be made available to subgrantees who are contracted less than \$350,000.

V.8.3 Monitoring Activities

In compliance with 10 CFR 440.12(b)(6) and WPN 22-4, THDA has established the following monitoring practices to ensure service providers adhere to contractual and federal regulatory constraints, have adequate programmatic and financial management control, and achieve acceptable quality standards in the field work performed.

Monitoring Overview

- The Compliance and Asset Management ("CAM") division of THDA is responsible for **programmatic monitoring** of the Weatherization Assistance Program ("WAP").
- The WAP Technical Advisor for the Community Services Division oversees the **technical monitoring** in partnership with Community Housing Partners.
- The Internal Audit division will conduct the **financial monitoring**.
- WAP Coordinators process invoices/reimbursement requests and ad hoc monitoring throughout the program year.

An estimated amount of 5% of the grantee administrative funds are used for programmatic monitoring, and about 40% of the T&TA funds are used for technical monitoring. THDA will monitor in accordance with the approach outlined in WPN 24-4 which includes, but is not limited to, the lists in the sections below. QA inspection selection process and the method will be applied uniformly across the state. The same clients selected for QA will also include file review of eligibility, procurement, etc.

Programmatic and Management Monitoring

The scope of the monitoring will include a review of the client files and technical inspections. Client jobs are randomly selected for file review and technical monitoring. Generally, clients selected for programmatic file review are the same for technical inspection, however this is subject to change due to client availability.

Each Subgrantee weatherization program will be monitored annually and in accordance with 10 CFR 440.23 and DOE WPN 24-4. Subgrantees will be monitored for compliance with federal and state policies and procedures, and where applicable, compliance with the Subgrantee's approved operational plan. A random or selected sample of case files will be reviewed. Through the use of THDA's WAP reporting platform, WAPez, the Housing Programs Compliance Team will monitor Subgrantees to ensure compliance. The desk review typically consists of client intake evaluation as well as review of audit and inspection related documents such as QCI forms, photos, and ASHRAE 62.2 calculations. Any questions related to the review or documents missing from the file upload may be requested during monitoring review. THDA will also request upload of missing or additional documents to WAPez, as necessary. Area of monitoring include but are not limited to:

- Correct determination of eligibility and notification provided, including the applicant's annual recertification where applicable
- Case documentation
- Identification of re-weatherized units, and agency method for tracking homes that have been weatherized
- Compliance with rental property requirements and eligibility
- Compliance with multifamily building policies

In addition to the review of case files, the following information will also be reviewed:

- Conduct inventory of any equipment (original purchase price of \$5000 or more) purchased with DOE funds.
- Review staff and contractor qualifications and contracts, if applicable, to determine compliance with program requirements and Subgrantee's operational plan

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- Review Subgrantee's process of tracking and addressing quality and workmanship concerns and findings for staff, auditors and contractors.
- Review process for contract payment.
- Review the agency procedures for identification of staff performance and subsequent corrective action to address any deficiencies.
- Using the Weatherization Manual / Operational Plan that each Subgrantee must sign and submit to the Grantee on an annual basis for review and approval, monitor for compliance with the Plan.
- The Subgrantee's most recent annual audit
- Review findings from Grantee's technical inspections and corrective action plans that have been implemented to address any concerns
- Ensure procurement process complies with federal and state requirements, and follows procedures outlined in the Subgrantee's operational plan
- Budget management of funds
- Compliance with production goals
- Contract compliance
- Timely and accurate submission of reports and invoices
- Identification of Training and Technical Assistance needs

This list is not meant to be all inclusive and may be expanded as necessary to ensure compliance with both federal and state program guidelines.

Financial Monitoring

THDA will comply with the requirements of 2 CFR 200 Subpart F Audit Requirements.

THDA's Internal Audit will perform a desk review using the Financial Monitoring Checklist and will issue a financial monitoring memo to the subgrantee. In addition, THDA's Internal Audit will perform a more comprehensive financial monitoring review at least once every three years to include additional testwork covering the following areas at a minimum:

- Financial Management/Accounting Systems and Operations
- Audits
- Payroll/Personnel
- Vehicles and Equipment
- File review of recent purchases
- Procurement
- Sub-awards/Subgrantee Monitoring
- Invoicing
- Records Retention

Coordinator Reviews

All invoices submitted for payment will undergo a desk review prior to any payment being authorized. This desk review will include subgrantee invoices and the documentation that supports the amount invoiced. The invoice and supporting documentation will be reviewed and approved by multiple staff persons prior to submission to THDA's fiscal department for payment.

Invoices reviewed that lack sufficient backup documentation will not be paid until documentation is provided that justifies the amount invoiced. Additionally, any invoiced expense that is not an allowable expense will be disallowed and deducted from the amount to be paid.

Technical Monitoring

THDA will conduct quality assurance inspections of at least five percent (5%) or more of all completed units per Subgrantee during the program year. Subgrantees that do not have an independent QCI to conduct the final inspection will increase monitoring to ten percent (10%) of completed units. THDA may increase the percentage of units being monitored for Subgrantees with significant deficiencies based on previous monitoring, in progress monitoring, desk reviews, multiple dwelling unit types, analysis of risk assessment and various other observations. Inspections will be performed by a certified Quality Control Inspector and performed by a THDA employee or a contractor acting on behalf of the Grantee. Weatherization activities will be monitored to ensure compliance with the guidelines provided in the Tennessee Weatherization Field Guide, the Health and Safety Plan, technical assistance memorandums and the WAP Manual.

Technical monitoring consists of desk review using WAPez as well as site visits to verify quality work practices and validity of the energy audit and inspection.

In-progress quality assurance inspections will also serve as an opportunity to provide technical assistance as appropriate. THDA compensates contract workers who attend at a flat rate of \$150/inspection using T&TA funds. The compensation encourages contractors to attend hands-on training while being removed from other paid work for the day. Additional description to this is found in the T&TA section of the plan.

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Subgrantees whose completed units require reworks, or other corrective action cannot use DOE funds for the correction process. Findings related to technical assistance visits will be tracked on a Subgrantee, auditor and contractor level to help identify exceptional, as well as poor performance and workmanship issues. These results will be used to identify training and technical assistance needs for our continuous quality improvement process.

Technical monitoring will review the work of the auditor, contractors, and the QCI. If there are repeat findings from the same QCI the local agency will be notified and the QCI will be placed on a corrective action plan including increased training.

THDA will monitor for the training and certifications requirements of WAP contractors and auditors during the technical monitoring visit. This is a shared responsibility with the Subgrantee.

Monitoring Reports and Corrective Action Plans

Within thirty (30) days following every programmatic, financial, or technical monitoring review, a report that details the findings of the visit, including any identified best practices will be provided to the Subgrantee agency. Should there be a significant delay to the thirty days, THDA will notify the Subgrantee with brief description and an alternate timeframe when the report will be delivered. The Subgrantee will be required to provide a written Corrective Action Plan (CAP), responding within (30) days, that addresses all identified findings and concerns. The CAP must provide the actions the local agency has taken or plans to take, along with a timeline for implementation, to address and alleviate the concerns. Issues must be resolved in a timely manner if significant deficiencies are discovered during monitoring. If the Subgrantee disagrees with any findings in the monitoring report, they may provide rebuttal as part of their CAP. The CAP is not final until it has been reviewed and all corrective action plans and/or rebuttals accepted by the Grantee. If there are questioned costs identified as part of the monitoring visit, and these costs are not successfully resolved during the CAP process, these costs will be recovered from the next invoice. If they cannot be recovered from a subsequent invoice, the Subgrantee will be required to make payment arrangements with THDA for the questioned costs.

Compliance with Corrective Action Plans will be monitored through desk reviews, communication with the Subgrantee, and subsequent monitoring visits. Subgrantees with significant deficiencies identified may receive additional monitoring visits as necessary. Subgrantees who continue to have substandard performance that is not successfully addressed by corrective action may have funding reduced, be placed on probation or face termination and will no longer be allowed to participate in the program.

Reporting

Within thirty (30) days from the end of the program year, THDA will create a report that provides a summary of each Subgrantee's financial reviews, program monitoring reports and any outstanding issues. This report will provide an overview of each Subgrantee's needs, strengths and weakness. This report will be utilized as a planning document and will be made available to DOE upon request.

As mandated by federal guidance, THDA will also provide to DOE a report that includes successes and significant problems identified through monitoring. This narrative report will be incorporated within the mandated *T&TA, Monitoring and Leveraging Report*. This annual report will be submitted within thirty (30) days from the end of the reporting period.

In addition to DOE reporting requirements related to monitoring, State Policy 22 requires an annual report of Subrecipient Monitoring. THDA will provide a summary of all Subgrantee monitoring, including findings and recommendations to the Tennessee Department of Finance and Administration.

Technical and Programmatic Monitoring Schedule

The monitoring will follow the quarterly schedule noted below and will also be based on production. Throughout the year we will monitor each Subgrantee at least once. Based on monitoring findings and outcomes, THDA will conduct additional visits as needed. Based on production, we will conduct annual program year monitoring visits for Subgrantees. Within thirty (30) days following every technical review, a report that details the findings of the visit, including any identified best practices will be provided to the Subgrantee agency. Should there be a significant delay to the thirty days, THDA will notify the Subgrantee with brief description and an alternate timeframe when the report will be delivered. The Subgrantee will be required to provide a written Corrective Action Plan (CAP), responding within (30) days, that addresses all identified findings and concerns. The CAP must provide the actions the local agency has taken or plans to take, along with a timeline for implementation, to address and alleviate the concerns. If the Subgrantee disagrees with any findings in the monitoring report, they may provide rebuttal as part of their CAP. The CAP is not final until it has been reviewed and all corrective action plans and/or rebuttals accepted by the Grantee.

Tentative Monitoring Schedule

- First Quarter
 - None
- Second Quarter – East TN
 - ETHRA, SETHRA, KKCCAC, UETHDA

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- Third Quarter – Middle TN
 - CMCCAA, MCCAA, MDHA, UCHRA, SCHRA
- Fourth Quarter – West TN
 - MHCD, SWHRA, DHRA, MCHRA

V.8.4 Training and Technical Assistance Approach and Activities

Training and technical assistance (T&TA) is available and required for all subgrantee personnel and private contractors providing any aspect of operating the Weatherization Assistance Program (WAP). Requests can be initiated by a subgrantee, monitor, or THDA program staff. THDA will ensure that all training paid for with T&TA funds meet the requirements of WPN 22-4.

For grantee provided assistance, THDA will determine the most appropriate personnel or method to provide (T&TA). Classroom and field training sessions providing hands-on experience will continue for subgrantee evaluators performing energy system health and safety tests and repairs. Field training sessions will reinforce classroom training that has already been conducted and will provide updated information on new heating equipment and components.

THDA will meet the requirements outlined in WPN 22-4 by providing training on the two required levels. Training schedules are updated every six months, and additional trainings can be requested on an as needed basis. THDA makes every attempt to coordinate trainings when requested, based on the already scheduled courses and instructor availability. THDA's Training Schedule does not span multiple Program Years.

Programmatic/Administrative Training

Programmatic trainings are conducted by THDA staff during monthly coordinator meetings and as issues are identified and as requested by the Subgrantees. The trainings will focus on areas of deficiency or new and updated policies. Programmatic trainings will also occur annually at the current Program Year's kickoff and will cover, but not limited to:

- Production goals and ACPU
- Client eligibility and application process
- Budgets and invoices
- WAPez data entry

Additionally, THDA is partnering with Clearesult to offer WAPez training for new state and agency staff. Refresher courses are available upon request and can be done virtually or in person.

Fiscal Training

Fiscal trainings are conducted by THDA staff as issues are identified and as requested by the Subgrantees. These trainings will address issues associated with 2 CFR 200 to ensure Subgrantees are complying with procurement, contractual requirements, reporting, and allowable costs. Overall expenditures are reviewed during monthly meetings with Subgrantee staff and THDA coordinators to identify any possible concerns in advance of monitoring visits.

Comprehensive Training

All staff hired to provide services equal to the JTA of a Retrofit Installer Technician must receive Comprehensive Training from an IREC-accredited training facility within the first year of hire and must receive job specific training every five (5) years after the completion of their initial training to serve as a refresher. This training is mandatory for a Retrofit Installer Technician.

All staff hired to provide services equal to the JTA of a Crew Leader must receive Comprehensive Training from an IREC-accredited training facility within one year of their hire or appointment to the Crew Leader position and must receive job specific training every five (5) years after the completion of initial training to serve as a refresher. This training is mandatory for the Crew Leader position, and RIT is a prerequisite for this training.

All staff hired to provide services equal to the JTA of an Energy Auditor must receive Comprehensive Training from an IREC-accredited facility before performing the duties of the Energy Auditor position and must receive job specific training every five (5) years after the completion of initial training to serve as a refresher. This training is mandatory for an Energy Auditor.

All staff hired to provide services equal to the JTA of a Quality Control Inspector must receive Comprehensive Training from an IREC-accredited facility before performing the duties of the Quality Control Inspector position and must receive job specific training every five (5) years after the completion of initial training to serve as a refresher. This training is mandatory for a Quality Control Inspector.

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Contractor Training Reimbursement

THDA will allow subgrantees to reimburse contractors for costs associated with training and provide a stipend for contractor staffing costs. The training reimbursements (T&TA budget item), which will be included in contractor agreements, will be as follows:

- Travel costs (e.g., hotels, mileage, other) and meal reimbursements shall be based on subgrantees' reimbursement policies for staff. With prior approval before THDA will allow.
- Subgrantees may pay a stipend of \$100 per day per trainee, not to exceed \$600 per week per trainee to the contractor for staff who are attending weatherization training.
- Subgrantees may pay training fees, if applicable, per trainee whom contractor sends to training.
- Subgrantees may pay for exam fees per trainee. In the event that the trainee does not pass the first attempt at the exam, subgrantees may pay for one more attempt. If trainees fail the second attempt, the trainees will need to retake the class, and THDA reserves the right to require the subgrantee to pay for the exams' expense. (All online courses require the trainee to retake the course for a second attempt at the class which is an allowable expense for the subgrantee. Any future attempts by trainees will need to be funded by the contractor. THDA reserves the right to fund future exam attempts on a case-by-case basis.)
- Any courses that require pre-test may be funded by the subgrantee for testing and pre-requisite course payments.
- Subgrantees will require the contractors to sign retention agreements if subgrantees are paying for any expenses of the required trainings.
- THDA will work with subgrantees who identify learning problems with crew/contractors that may warrant testing accommodations to submit documentation to BPI to request needed accommodations.

Specific Training

Single-issue, short-term training to address acute deficiencies in the field are available such as: ASHRAE 62.2, Building Analyst, Combustion Appliance Zone Safety, Zonal Pressure Diagnostics, Leakage Envelope and Ducts, and WA Web Audit Software. Individual sections of the Retrofit Installer Technician class can be pulled out for focused training such as dense packed wall and crawlspace. Training and technical assistance will also be provided through on-site visits, webinars, interactive web-based meetings, regional training sessions, or statewide training sessions and third-party providers such as OSHA online training, CPR, online asbestos awareness training, online mold and moisture training, online lead safe weatherization and 3rd-party hands-on lead safe weatherization training.

THDA requires that subgrantees seek training opportunities through the contracted T&TA provider, Community Housing Partners, before seeking external trainings. If CHP is unable to provide the training, or cannot do so in a timely manner, subgrantees may request training through another source. For out-of-state Comprehensive and Specific trainings, subgrantees must maintain documentation showing why similar training was not available or cost effective in Tennessee.

CHP's available training courses are listed online at <https://www.communityhousingpartners.org/energy-solutions/research-training-center/chp-courses/> and a class schedule is emailed on a regular basis. Training completions are tracked for each subgrantee including contractors to include name, subgrantee, completion date, pass or fail, certification obtained.

After concluding a training or technical assistance activity, the specifics of the training are documented including which trainer conducted the activity, what training or assistance was provided, when and where the activity occurred, and which subgrantee staff participated in the activity. These reports will be completed by each subgrantee and kept in their records.

THDA will provide training and technical assistance to all subgrantees as described in the following plan:

- 1) Routine Technical Assistance: Technical assistance covering any programmatic aspect of operations can be provided by the monitoring staff (during monitoring visits), THDA staff. Technical assistance can be offered any time the subgrantee encounters a problem or issue. If the monitor identifies major problems that cannot be addressed during the monitoring visit, more extensive technical assistance will be scheduled in the immediate future following the monitoring visit. Technical assistance related to the actual installation of weatherization measures will be provided by THDA Technical Advisors.
- 2) State Training: Statewide training will be scheduled by THDA when it is deemed necessary. Appropriate subgrantee staff and private contractors are required to attend each state-sponsored training session. Funds are made available to support the expenses incurred while attending the training for subgrantee staff and private contractors. THDA will host bi-annual statewide meetings to provide general program updates and share programmatic and technical information and guidance.
- 3) Energy Auditor/QCI Exchanges – THDA hosts a monthly call with all EA/QCI to discuss trends and determinations for network wide or targeted training needs. These meetings also review the work quality observed in the field, to review contractor interactions, and to review recent monitoring results. In addition, EA/QCIs are given an opportunity to provide feedback on the energy audit software and share best practices.
- 4) Contractor Office Hours - Virtual office hours are held quarterly for all approved & interested contractors within the state. There is one morning

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session and one afternoon session per quarter. This time is held to answer their questions, field their feedback, and provide any support needed to be successful in the field.

Additionally, the reviews performed by compliance staff identify training needs. Frequent interaction among staff identifies problematic areas at specific subgrantees. All monitoring findings and observations are tracked on the Technical Monitoring Results Tracker. This log was implemented during PY24 and it tracks the number of findings, concerns, observations, and best practices in addition to assisting in planning trainings or onsite T&TA.

This three-pronged approach (Technical, Programmatic and Compliance) has helped subgrantees who have experienced leadership changes and organizational challenges and help correct onsite work issues.

Training is provided by THDA's Technical Advisors and Community Housing Partners. Anyone working in the Weatherization Assistance Program (WAP), including private contractors, are required to attend training sessions as they relate to their job duties.

While each subgrantee is allocated sufficient funds to attend trainings and conferences, prudent use of the training funds is expected. Subgrantees are required to maintain information in their files to document that all expenses for training are both reasonable and necessary for implementation of the weatherization program. T&TA funds allocated to subgrantees cannot be used to pay for Energy Auditor or QCI training/testing more than three times per staff person. Additional training/testing for that person's QCI must be covered by another funding source.

T&TA funds may also be used to train subgrantee contractors participating in the WAP. In making the determination to pay for contractors' training, subgrantees must secure a retention agreement in exchange for the training. The retention agreement must require that contractors will work in the WAP for a specific amount of time which must align with the cost of the T&TA provided.

Following are the training requirements for each job position in the WAP. Failure of a subgrantee staff member or private contractor to meet the following series of certification criteria for the position in which they are employed and within the time frames established by THDA will result in that individual or private contractor being prohibited from performing the assigned or contracted activities on client dwellings. Participation in and the successful completion of advanced, refresher and other related training is required to maintain qualified staff to perform program activities. THDA will make every effort to assist subgrantee personnel with attaining the required skill levels.

Training and Certification Requirements

Any subgrantee weatherization staff assigned to perform energy audits or inspection activities as any portion of their job duties must participate in and successfully pass the training requirements listed here as well as any other training deemed necessary by THDA.

Contractors performing general weatherization work (and their employees) must attend comprehensive training for their job duties; Installer staff must attend Retrofit Installer Technician training, Crew Leaders must attend Crew Leader training.

Energy Auditor (EA)

- I. OSHA 10 Certification or Equivalent (10 Hours)
- II. BPI Energy Auditor Certification
- III. Retrofit Installer Technician Course (RIT)*
- IV. Lead Safe Weatherization Course (LSW)**
- V. HVAC Fundamentals Course****
- VI. ASHRAE 62.2 Course*****
- VII. NEAT/MHEA/WAPez Software Training
- VIII. Renovate-Repair-Paint Certification (RRP)***

Quality Control Inspector (QCI)

- I. OSHA 10 Certification or Equivalent (10 Hours)
- II. BPI Energy Auditor Certification

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III. BPI Quality Control Inspector Certification

IV. Retrofit Installer Technician Course (RIT)*

V. Lead Safe Weatherization Course (LSW)**

VI. HVAC Fundamentals Course****

VII. ASHRAE 62.2 Course****

VIII. NEAT/MHEA/WAPez Software Training

IX. Renovate-Repair-Paint Certification (RRP)***

Crew Leader (CL) *Required to be present at each job site.*

I. OSHA 30 Certification or Equivalent (30 Hours)

II. Retrofit Installer Technician Course (RIT)*

III. Lead Safe Weatherization Course (LSW)**

IV. HVAC Fundamentals Course****

V. ASHRAE 62.2 Course****

VI. Crew Leader Course (CL)

VII. Renovate-Repair-Paint Certification (RRP)***

Crew Worker (Retrofit Installer Technician – RIT)

I. OSHA 10 Certification or Equivalent (10 Hours)

II. Retrofit Installer Technician Course (RIT)*

III. Lead Safe Weatherization Course (LSW)**

IV. Renovate-Repair-Paint Certification (RRP)***

** This course may be exempt in the instance of prior experience. THDA review & approval of prior experience is required.*

*** This course is not required, but highly recommended.*

**** One person on each job site is required to hold this certification. THDA Recommends having multiple individuals certified to reduce the risk of noncompliance.*

***** This course is not required to begin work but should be completed with 6 months of hire or from date of signing retention agreement.*

THDA Monitoring Staff Required Certifications/Training Certificates:

- BPI Energy Auditor Certification
- BPI Quality Control Inspector Certification
- Certified Lead Renovator (RRP)
- WA Web
- OSHA 10

All certifications to be obtained within one year of hire. THDA Technical Advisors must also display a knowledge of the TN State Plan, WAP Manual and SWS Field Guide.

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Client Education

Energy efficiency education occurs throughout weatherization services. Energy auditors distribute Tennessee Valley Authority funded energy kits to clients which include LED bulbs, outlet gaskets, and energy saving tips. *THDA is working with TVA to update the contents of the Energy Kits as of April 2025 and expects to have them ready for distribution for PY25.* Clients also receive an assortment of healthy home brochures including EPA's Mold & Moisture in Your Home, Renovate Right: Lead Based Paint Activities, and the Citizen's Guide to Radon.

THDA also created a Client Education Checklist for the auditor and client to work through step by step prior to the audit as well as during the quality control inspection.

A printable version of Preventing Carbon Monoxide Poisoning can be found here, https://www.epa.gov/sites/production/files/2015-08/documents/pcmp_english_100-f-09-001.pdf

A printable version of, "What You Should Know About Space Heaters" can be found here, <http://www.hipspro.com/pubs/SpaceHeatSafety.pdf>

A printable version of "Combustion Equipment Safety" can be found here, https://www1.eere.energy.gov/buildings/publications/pdfs/building_america/26464.pdf

T&TA dollars are not used to fund client education.

Energy Savings Comparison Analysis of Subgrantees

Analysis of energy savings is currently conducted by THDA on multiple levels. Through THDA's partnership with the Tennessee Valley Authority, an estimation of energy savings report is compiled by TVA at the close of each federal fiscal year. The report details an estimate of energy savings organized by commonly installed weatherization measures such as attic insulation and air sealing, as well as equipment such as HVAC systems and water heaters. THDA can use this information as a foundation when comparing energy savings of individual units to the report averages during onsite and desktop monitoring.

The program's reporting platform, WAPez, has also added greater accessibility to estimated energy savings pulled from the Recommended Measures report within the Weatherization Assistant. Information gathered at this level will easily allow THDA to conduct timely comparisons of energy savings across Subgrantees and to national averages.

A number of variables influence energy savings from unit to unit, agency to agency. Considering size and dwelling type, auditor experience and accuracy, effectiveness of client education, among other things all contribute to both the estimated and actual energy savings. Using the comparison analysis of energy savings will help highlight training needs across the network.

Additional Programmatic, Financial, Management Training Opportunities

Subgrantees are permitted to seek additional training avenues if sufficient justification can be presented on how said training would benefit the weatherization program. Training requests must be submitted to THDA for review and approval prior to the training.

Future Training Plan

Once Comprehensive training has been established, the training needed to address acute deficiencies, or any of the training listed above that does not fall under Comprehensive Training as defined in WPN 22-4, will be considered Specific training. Specific training will be provided by THDA Staff, webinars, or other outsourced training providers. All future trainings are also subject to change based on recommendations and monitoring reports from DOE, HHS, program and field policy updates, IG reports, or other partner recommendations. THDA will continue to conduct monthly meetings with WAP program managers and staff. The meetings will serve the function of allowing subgrantees a forum to share best practices, brainstorm innovative solutions to issues which create challenges for all and receive program administration updates and training on high-priority topics from THDA. THDA provides semi-annual network-wide Weatherization meetings that cover programmatic and fiscal updates, planning, tracking, and trainings identified as problematic areas during monitoring and monthly invoicing. THDA will continue to train all field staff to their JTA in order to meet the mandate of WPN 22-4.

THDA staff attend national conferences for training on WAP. Conferences are supported mostly with administrative dollars under this grant. If technical staff attend conferences, any unspent T&TA money is used to fund the conferences, such as National Home Performance Conference (NHPC) and Energy OutWest (EOW). Admin and LIHEAP funding is used to supplement conference registrations and travel when T&TA is not available for THDA technical staff.

Percent of overall trainings

Comprehensive Trainings: 50.0

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Specific Trainings:

Breakdown of T&TA training budget

Percent of budget allocated to Auditor/QCI trainings:

Percent of budget allocated to Crew/Installer trainings:

Percent of budget allocated to Management/Financial trainings:

V.9 Energy Crisis and Disaster Plan

The following plan will be executed upon a federal or state declaration of disaster for a specific area within the state.

Subgrantees must identify those current clients who reside in a disaster area and contact the client to determine if the home has sustained any damage. If the client states the home was not damaged in the disaster, document the case file to reflect their statement, along with the date of the contact and the name of the agency representative who spoke to the client. No further action is required, and standard WAP procedures will be followed. If the client states damage occurred, document the contact in the client file, and follow the disaster plan guidance based on the current job status for the home.

Waitlisted

If a dwelling is on the waitlist, and the home is destroyed or condemned, or if the applicant has moved without intending to return once repaired, terminate the WAP case.

If the dwelling is damaged and requires repair, the home remains on the wait list. Determine if the home is eligible for extra priority points because of the disaster and adjust accordingly. Document the client file with relevant information and action taken.

Audit Only

If the home had an energy audit performed, but the job has not yet been awarded, do not award the job. If it is determined that the home was destroyed or condemned, or if the client is no longer residing in the home and does not intend to return once repaired, close the case and document the file.

If the home was not destroyed, conduct a new energy audit to determine if the condition of the home permits the weatherization work to continue, and the weatherization measures to be installed. If home repairs are necessary due to damage, these repairs are to be completed utilizing funds other than DOE (insurance, disaster relief funds, personal funds or loans, funds from other programs, etc.) prior to the energy audit being performed.

Weatherization Has Commenced

If the installation of weatherization measures was in process (work had begun, but the quality control inspection had not been completed), and the contractor had not yet completed the work, determine the

dwelling's condition.

If destroyed, the contractor is to invoice the agency for only those measures installed in the home at the time of the disaster. No post inspection is required, but the agency must confirm the home was destroyed and an audit is not possible due to damage. This home cannot be counted as a completed unit; DOE

Weatherization funds may be used to pay for audit and contractor costs.

If the home was not destroyed, and repairs are necessary due to damage, these repairs are to be completed utilizing other funding sources. Another energy audit will be required once repaired to establish the status of the home, and the appropriate energy measures based on that status.

The job may need to be deferred until necessary renovations are completed prior to weatherization taking place. The contractor may be paid for all measures installed at the point of the disaster, with a QCI to be conducted on the measures if possible. It may be necessary to rebid the job if the work to be performed changes significantly or there is a long delay before the job can be finished while waiting on repairs. Do not close the job until all weatherization work is completed. Depending on the amount of work to be performed following the disaster, the job may need to be rebid.

Items that had been installed but were subsequently destroyed due to the natural disaster and not covered by the homeowner's insurance or other funding sources, including disaster relief benefits, may be included in the subsequent audit and work order. The change order process must be followed to accommodate the newly defined measures.

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Weatherization Assistance Program (WAP)
STATE PLAN / MASTER FILE WORKSHEET
Grant Number: SE0001852, **State:** TN, **Program Year:** 2025
Recipient: State of Tennessee

DOE funds may only be used for those energy related incidental repairs. WAP is not designed to be a renovation program.

Home Damaged: Reweathering of Previously Completed Units

A home that has been weatherized prior to the disaster, but which was damaged by a federal or state declared disaster, may reapply for re weatherization services without regard to the date previously weatherized. A new energy audit is required. All other eligibility conditions will apply, and the job must be reported as a reweatherization.

Additional Priority Points

Current clients in a disaster area may be provided priority services, with 15 additional points provided to disaster victims. These points are added to the points already provided to vulnerable household members as part of the priority point system. Additional priority points will only be provided upon verification of a FEMA assigned number for that client/residence for the specific disaster. *See V.3 Priorities for details.*

Points to Remember

- If a weatherization job that was in process or completed was damaged in the natural disaster, the subgrantee must determine if the homeowner has insurance or other funds available to cover the costs of repairs. Weatherization funds may not be used if the damage was covered by insurance or other funding sources. Weatherization funds may only be used to address eligible weatherization activities, as currently allowed in Tennessee's policies and procedures.
- If possible, local agencies will coordinate the weatherization work efforts for the home to gain efficiencies. This does not negate the requirement to perform an energy audit based on current unit circumstances.
- Personnel that are paid from DOE funds are not allowed to perform disaster relief work in the community. They are permitted to perform work related to protecting the DOE investment, such as securing and protecting weatherization materials and equipment and agency program files and records when the disaster initially occurs.
- All jobs are subject to the annual ACPU. This includes both pre-disaster and post-disaster work with the exception of jobs that are considered re weatherization. This cap may only be exceeded with prior approval from the State.