

**U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
WEATHERIZATION ANNUAL FILE WORKSHEET**

(Grant Number: EE0006158, State: ME, Program Year: 2013)

IV.1 Subgrantees

Subgrantee (City)	Planned Funds/Units
Aroostook County Action Program (Presque Isle)	\$290,934.00 28
Community Concepts, Inc. (South Paris)	\$381,582.00 40
Kennebec Valley Community Action Program (Waterville)	\$539,371.00 57
Penquis Community Action Program (Bangor)	\$496,424.00 51
People's Regional Opportunity Program (Portland)	\$211,010.00 23
Waldo Community Action Partners (Belfast)	\$120,151.00 13
Washington-Hancock Community Agency (Milbridge)	\$274,156.00 24
Western Maine Community Action (East Wilton)	\$103,022.00 11
York County Community Action Corporation (Sanford)	\$218,317.00 23
Total:	\$2,634,967.00 270

IV.2 WAP Production Schedule

Weatherization Plans	Units
Total Units (excluding reweatherized)	268
Reweatherized Units	2

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

Average Unit Costs, Units subject to DOE Project Rules		
VEHICLE & EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)		
A	Total Vehicles & Equipment (\$5,000 or more) Budget	\$0.00
B	Total Units Weatherized	268
C	Total Units Reweatherized	02
D	Total Dwelling Units to be Weatherized and Reweatherized (B + C)	270
E	Average Vehicles & Equipment Acquisition Cost per Unit (A divided by D)	\$0.00
AVERAGE COST PER DWELLING UNIT (DOE RULES)		
F	Total Funds for Program Operations	\$1,865,995.00
G	Total Dwelling Units to be Weatherized and Reweatherized (from line D)	270
H	Average Program Operations Costs per Unit (F divided by G)	\$6,911.09
I	Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$0.00
J	Total Average Cost per Dwelling (H plus I)	\$6,911.09

IV.3 Energy Savings

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

Method used to calculate savings description:

For PY13 and PY14 combined: 270 Units
 x 30.50 MBTUs
 \$8,235.00 MBTUs - total annual estimated energy savings

MaineHousing is utilizing the DOE recommended energy savings formula.

This year estimated energy savings (MBtus):
Prior year estimated energy savings (MBtus): **Actual:**

IV.4 DOE-Funded Leveraging Activities

The Grantee has budgeted \$0 DOE funds for leveraging activities in PY'13.

IV.5 Policy Advisory Council Members

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

albert Hodson III	Type of organization: Other Contact Name: Phone: (866)376-2463 Email: efficiencymaine@efficiencymaine.com
Brent Boyles	Type of organization: Other Contact Name: Phone: (866)376-2463 Email: efficiencymaine@efficiencymaine.com
David Barber	Type of organization: Other Contact Name: Phone: (866)376-2463 Email: efficiencymaine@efficiencymaine.com
Doug Smith	Type of organization: Other Contact Name: Phone: (866)376-2463 Email: efficiencymaine@efficiencymaine.com
Efficiency Maine Trust	Type of organization: Unit of Local Government Contact Name: Jim Atwell Phone: (866)276-2463 Email: efficiencymaine@efficiencymaine.com
James Atwell	Type of organization: Other Contact Name: Phone: (866)376-2463 Email: efficiencymaine@efficiencymaine.com
John Gallagher	Type of organization: Unit of State Government Contact Name: Phone: (207)626-4600 Email: jgallagher@mainehousing.org
John Rohman	Type of organization: Other Contact Name: Phone: (866)376-2463 Email: efficiencymaine@efficiencymaine.com
Naomi Mermin	Type of organization: Other Contact Name: Phone: (866)376-2463 Email: efficiencymaine@efficiencymaine.com

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Patrick Woodcock	Type of organization: Unit of State Government Contact Name: Phone: (207)624-7405 Email: Patrick.C.Woodcock@maine.gov
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IV.6 State Plan Hearings (Note: attach notes and transcripts to the SF-424)

Date Held	Newspapers that publicized the hearings and the dates the notice ran
No record found	

IV.7 Miscellaneous

<p>Policy Advisory Council</p> <p>2009 Public Law Chapter 372, An Act Regarding Maine’s Energy Future, repeals 5 MRSA §3327, which established the Energy Resources Council, and places oversight of energy-related programs under the jurisdiction of the Efficiency Maine Trust as of July 1, 2010. The new law requires that “after July 1, 2010, the Maine State Housing Authority, prior to applying for federal funds on behalf of the State... for weatherization, energy conservation and fuel assistance pursuant to the Weatherization Assistance for Low-Income Persons Program administered through the United States Department of Energy and the Low-Income Home Energy Assistance Program administered through the United States Department of Health and Human Services, shall submit to the board for its review and input the authority’s implementation plans for the use of such funds. The plans must provide for coordination by the Maine State Housing Authority in its use of such funds with the programs administered by the trust.... The Maine State Housing Authority shall include in its plans any recommendations of the board to the extent the recommendations are consistent with the applicable federal guidelines governing the use of the funds.” The Efficiency Maine Trust is controlled by a board of nine voting members. The statutory membership includes the Director of the Maine State Housing Authority, the Director of the Governor’s Office of Energy Independence and Security and seven members appointed by the Governor that adequately represent the interests of commercial energy consumers, industrial energy consumers, small business energy consumers, residential energy consumers, and low-income energy consumers. The body as a whole must include persons with knowledge and experience in financial matters, consumer advocacy, conservation fund programs, carbon reduction programs, and climate change policy.</p> <p>The individuals appointed to this committee include: Jim Atwell-Chair; Al Hodson-Vice Chair; Brent Boyles-Treasurer; David Barber, John Rohman, Doug Smith; Naomi Mermin; Patrick Woodcock-Director, Governor’s Energy Office; and John Gallagher-Director, Maine State Housing Authority.</p> <p>The Efficiency Maine Trust reviewed MaineHousing’s draft plans for the 2013 Regular program at its February 27, 2013 meeting.</p> <p>Michael Baran is named as MaineHousing’s Recipient Business Officer and is the representative authorized to act on behalf of MaineHousing to negotiate the award. All DOE official correspondence related to the award will be addressed to the Recipient Business Officer.</p> <p>Michael Baran is named as MaineHousing’s Recipient Principal Investigator and is the technical representative authorized to act on behalf of MaineHousing as project manager for the award. The Recipient Principal Investigator is the prime point of contact for the DOE Project Officer during the project period of performance and will receive a copy of all DOE official correspondence related to the award.</p>
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BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0006158		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address Maine State Housing Authority 353 Water Street Augusta, ME 043304633		4. Program/Project Start Date 04/01/2013	5. Completion Date 03/31/2015

SECTION A - BUDGET SUMMARY

Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. DOE 2013 & 2014 WAP Formula Funds	81.042	\$ 0.00		\$ 3,173,547.00		\$ 3,173,547.00
2. STATE			\$ 0.00		\$ 0.00	\$ 0.00
3.						
4.						
5. TOTAL		\$ 0.00	\$ 0.00	\$ 3,173,547.00	\$ 0.00	\$ 3,173,547.00

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) GRANTEE ADMINISTR ATION	(2) SUBGRANTE E ADMINISTR	(3) GRANTEE T&TA	(4) SUBGRANT EE T&TA	
a. Personnel	\$ 93,879.92	\$ 0.00	\$ 87,812.59	\$ 0.00	\$ 181,692.51
b. Benefits	\$ 43,158.02	\$ 0.00	\$ 35,148.62	\$ 0.00	\$ 78,306.64
c. Travel	\$ 0.00	\$ 0.00	\$ 63,618.60	\$ 0.00	\$ 63,618.60
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 574.38	\$ 0.00	\$ 2,348.33	\$ 0.00	\$ 2,922.71
f. Contract	\$ 7,913.19	\$ 264,698.00	\$ 190,417.92	\$ 130,000.00	\$ 2,833,298.11
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other	\$ 13,151.84	\$ 0.00	\$ 556.59	\$ 0.00	\$ 13,708.43
i. Total Direct Charges	\$ 158,677.35	\$ 264,698.00	\$ 379,902.65	\$ 130,000.00	\$ 3,173,547.00
j. Indirect	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
k. Totals	\$ 158,677.35	\$ 264,698.00	\$ 379,902.65	\$ 130,000.00	\$ 3,173,547.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0006158		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address Maine State Housing Authority 353 Water Street Augusta, ME 043304633	4. Program/Project Start Date		04/01/2013
	5. Completion Date		03/31/2015

SECTION A - BUDGET SUMMARY						
Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1.						
2.						
3.						
4.						
5. TOTAL		\$ 0.00	\$ 0.00	\$ 3,173,547.00	\$ 0.00	\$ 3,173,547.00

SECTION B - BUDGET CATEGORIES						
6. Object Class Categories	Grant Program, Function or Activity				Total (5)	
	(1) PROGRAM OPERATION S	(2) HEALTH AND SAFETY	(3) LIABILITY INSURANCE	(4) FINANCIAL AUDITS		
a. Personnel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 181,692.51	
b. Benefits	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 78,306.64	
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 63,618.60	
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 2,922.71	
f. Contract	\$ 1,865,995.00	\$ 214,271.00	\$ 140,002.00	\$ 20,001.00	\$ 2,833,298.11	
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	
h. Other	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 13,708.43	
i. Total Direct Charges	\$ 1,865,995.00	\$ 214,271.00	\$ 140,002.00	\$ 20,001.00	\$ 3,173,547.00	
j. Indirect	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	
k. Totals	\$ 1,865,995.00	\$ 214,271.00	\$ 140,002.00	\$ 20,001.00	\$ 3,173,547.00	
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	

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BUDGET INFORMATION REMARKS

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Remarks

Contracts: For software/database development budget, \$35,000.00 has been budgeted. Please see the Master Plan, T&TA, Section V.8.4 for further details on this line item.

In addition, in the Master Plan, T&TA, Section V.8.4 details out other items listed under contract for education and training items.

MaineHousing has no indirect cost plan. Costs are charged directly.-

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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

Maine has chosen the following definition of low income for the basis of eligibility for the Weatherization Assistance Program: Low income means that income in relation to household/family size is at or below 200% of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget.

Describe what household Eligibility basis will be used in the Program

Maine has chosen the following definition of low income for the basis of eligibility for the Weatherization Assistance Program: Low income means that income in relation to household/family size is at or below 200% of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget.

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

A household may include (a) an alien who has obtained the status of an alien lawfully admitted for temporary residence under Section 210 of the Immigration and Nationality Act by approval of an application and are categorized as Special Agricultural Workers (SAWS) who perform seasonal agricultural work during a specified period of time; or (b) an alien who has obtained the status of an alien lawfully admitted for temporary residence under Section 245A and 210A of the Immigration and Nationality Act by approval of an application and who is aged, blind and/or disabled as defined in Section 1414 (a)(1) of the Social Security Act (Public Law 74271); or (c) Cuban or Haitian aliens as defined in Public Law 96422, Section 50I (e). Applicants are considered eligible if they have a Green Card or show permanent residence (I-551 Alien Registration Card, Passport, I-688 Employment Authorization Card, I-766 Employment Authorization Document, I-94 with R-1 or R-2 status designation). I-94 documents with no status designated only show permission to enter the U.S. but do not establish residency.

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

- In order for weatherization to be completed on a unit, the household members must meet one of the following eligibility criteria to assure compliance with the requirements of 10 CFR 440.22:
 - A dwelling unit shall be eligible for weatherization assistance if it is occupied by a household that meets the eligibility for assistance under the Low Income Home Energy Assistance Act of 1981 as determined in accordance with criteria established by the Director of the Office of Management and Budget.
 - Prior to weatherizing entire multi-family housing units, a specific eligibility test will be applied. Not less than 66 percent (or 50 percent in the case of multi-family units of 2 to 4 dwelling units), must be eligible or must become eligible dwelling units within 180 days under a federal, state or local program for rehabilitating the building or making similar improvements to the building.
 - Re-weatherized units: Maine complies with 10 CFR 440.18 and allows units partially weatherized under this part or under other federal programs prior to September 30, 1994 to receive further financial assistance for weatherization under Maine's WAP. Maine requires that these units be reported separately. Each dwelling unit served must receive a complete new energy audit that takes into account any previous energy conservation improvements to the dwelling. Sub-grantees are allowed to count these homes as completions for the purposes of compliance with the per-home expenditure limit in 440.18.

Describe Reweathering compliance

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Describe what structures are eligible for weatherization

Maine's Weatherization Assistance Program, which is being utilized statewide, consists of the following components: an Individual Audit for Each Dwelling Unit; Energy Savings Calculations Based on ASHRAE Fundamentals, and a Comprehensive Health and Safety Protocol. Prior to initiating any weatherization activities, sub-grantees are required to evaluate:

- 1) the physical condition of the home;
- 2) the mechanical systems, and
- 3) building tightness.

If homes fail to meet minimum standards as to Structural Integrity and Health & Safety, weatherization must be deferred until the issue is resolved. Documentation of all activities in the client file is required. Deferral may be required if the auditor determines that any health and safety or structural conditions exist which may endanger the health and/or safety of the workers or occupants. In such cases, the use of other existing resources such as the Home Repair Program will be explored. Work on a deferred unit will not commence until existing dangerous conditions have been corrected. In addition units located in an area slated for development may need to be deferred to ensure that resources are not wasted on a unit slated for demolition or relocation. WPN 11-6 will serve as guidance in the deferral process.

Information gained is used first to evaluate the physical condition of the home and its mechanical systems. This evaluation includes blower door tests, combustion efficiency analysis, minimal ventilation assessment, fossil fuel appliance CO₂ testing and moisture level evaluation. Results determine the necessity for various remedial actions, which must be accomplished prior to weatherization as well as reasonable investment levels. Blower door testing also pinpoints air sealing work, determines the actual air barrier, documents existing ventilation, determines the necessity for duct sealing and system balancing and helps establish the building tightness limit. Post measures testing evaluates indoor air quality, measures effectiveness and fossil fuel appliance safety.

Maine's Health and Safety Procedures as described in the Maine Weatherization Standards Manual requires a total assessment of the client home. Briefly, and not all inclusive, by use of the ECOS Field Form or the Maine Energy Audit Field Form (MEAFF), the auditor is first required to assess the home from basement to attic, listing possible pollutant sources and recording any observable pollutant indicators, interview the client as to health problems and lifestyle, test all combustion appliances to the degree allowed by law as to efficiency, draft and pollutant production, do pressure differential testing if applicable, calculate the requirements for combustion air and assess the adequacy of the existing combustion air supply, test for spillage and back-drafting, assess venting capability of all combustion exhaust vents, and finally, check for CO₂ production of all combustion appliances. Homes which fail combustion safety tests must be deferred until corrective action is taken. Homes with unvented fossil fuel heaters cannot be air sealed in any fashion, until their use is discontinued. Also, no weatherization activity which will affect the drying capability of the client home may be undertaken until all necessary moisture control activities have been completed. After the weatherization measures are completed, the home must be checked once again to ascertain that all combustion appliances are operating safely.

All documents completed during the total assessment of the client's unit will be available

Describe how Rental Units/Multifamily Buildings will be addressed

Rental Procedures: Maine's goal for the weatherization of multifamily units is for the low income tenants to receive a direct benefit. For the purpose of this policy, multifamily properties are those with five (5) or more units. One of the units may be occupied by the owner. MaineHousing, consistent with Department of Energy guidance, requires the weatherization of the entire building not just the low income units. The amount available to weatherize the entire building is equal to the maximum dollar amount that may be spent weatherizing the low income units. There are many positive outcomes that result from weatherization; tenant comfort, preservation of affordable housing, and carbon reductions to name a few. However, there is so little money compared with the need that the focus must remain on properties where the low income tenants see a direct financial benefit. Multi-family units will be prioritized similar to single family: tenants with the highest energy use and highest energy burden (as a percentage of income) will receive priority. Weatherization Assistance Program (WAP) funding may be used to weatherize multi-family units according to the following guidelines:

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1. At least 66% of residents in the property (determined on a building-by-building basis in a multi-building property) must meet WAP income guidelines.
2. The percentage of funding per program year that may be multi-family is limited to the highlighted percentage shown in the table below.

MaineHousing will calculate the multifamily cap using the housing tenure indicated in the most recent LIHEAP or Comprehensive Housing Affordability Strategy data available (whichever is more favorable). For properties with more than one building and a common owner, each building will be considered separately in determining whether the structure will or will not count towards the multifamily caps. Weatherization of building structures with one unit (including single-family attached homes such as townhouses, even if part of a larger multifamily property, which are separated by a full ground-to-roof wall) and building structures with 2-4 units (including stacked duplexes and triple deckers) do not count towards the multifamily caps.

Prior to conducting the energy audit, the sub-grantee must verify the ownership of the unit/building and secure landlord's/owner's and tenant's consent, in writing, to proceed with weatherization services measures. Additionally, the landlord and tenant are required to sign a "Weatherization Rental Agreement" before the sub-grantee can proceed with weatherization. The provisions of this agreement include:

- Rent Increases: Prohibits an increase for twelve (12) months because of any increase in the value of the property due solely to the weatherization work.
- Sale of Property: If the property is sold within one (1) year of the completion of weatherization work, the owner must reimburse the sub-grantee for the cost of the weatherization material installed.

Before proceeding with multi-family weatherization, sub-grantees must contact Energy & Housing Services (EHS) providing specific details on the property in question - address, project name, and how the property meets priority requirements. EHS will research the project and, if appropriate, provide clearance to move forward. If an agency weatherizes without approved clearance and MaineHousing subsequently determines the project is MaineHousing's portfolio, is financed/owned by a sub-grantee, or sufficient reserves are in place for the project to incur these costs, MaineHousing has the right to refuse to reimburse for weatherization costs incurred.

Describe the deferral Process

DEFERRAL OF SERVICES POLICY: When conditions are discovered that are too hazardous for the client or weatherization personnel for weatherization procedures to commence, a deferral of services policy has been developed. "Deferral" does not necessarily mean that the client will not receive weatherization services but that until the conditions are rectified, the weatherization services are temporarily postponed. Sub-grantees must attempt to refer the client to alternative resources. Once rectified, the home can be weatherized. Unfortunately, there may be extreme cases where the problem is beyond the scope of the available funding and/or a case where the client is not willing to cooperate. In either case an agency must determine what is in the best interest of all concerned and proceed accordingly, ensuring appropriate documentation is in the client file.

V.1.3 Definition of Children

Definition of children (below age): 2

V.1.4 Approach to Tribal Organizations

Recommend tribal organization(s) be treated as local applicant?

If YES, Recommendation. If NO, Statement that assistance to low-income tribe members and other low-income persons is equal.

The low-income members of an Indian tribe shall receive benefits equivalent to the assistance provided to other low-income persons within Maine. Maine allocates funds to five tribal organizations based upon the number of eligible LIHEAP applicants. This has resulted in three percent of Maine's DOE grant award being allocated to the five tribes. Actual administration of the weatherization programs in the tribal organizations is provided by neighboring Community Action Agencies.

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V.2 Selection of Areas to Be Served

In the case of areas currently served by a Community Action Agency (CAA) established under Section 222(a)(12) of the Economic Opportunity Act of 1964, as amended, funds available under this program will be granted to that Community Action Agency for the same geographic area. Any new or additional sub-grantee shall be selected at a hearing in accordance with 10 CFR Section 440.14(a), as amended, and upon the basis of the criteria set forth in 10 CFR 440.15(a), as amended.

Maine WAP serves all counties within the State of Maine through nine (9) sub-grantees.

Each sub-grantee in the State of Maine is, in fact a CAA or other public or non-profit entity.

The Grantee ensures that each sub-grantee is selected on the basis of public comment received during a Public Hearing conducted pursuant to 440.14(a) and other appropriate findings regarding:

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

In selecting a sub-grantee, preference is given to any CAA or other public or non-profit entity which has, or is currently administering, an effective program under this part or under Title II of the Economic Opportunity Act of 1964. Program effectiveness is evaluated by consideration of factors including, but not necessarily limited to the following:

- a. The extent to which the past or current program achieved or is achieving weatherization goals in a timely fashion;
- b. The quality of work performed by the sub-grantee;
- c. The number, qualifications, and experience of the staff members of the sub-grantee; and
- d. The ability of the sub-grantee to secure volunteers, training participants, public service employment workers, and other Federal or State training programs.

V.3 Priorities for Service Delivery

Priority for weatherization services will be identified through the use of MH's high energy use/energy burden list, which lists LIHEAP eligible households and their annual energy consumption usage for heat. From the list households that include elderly, disabled and/or a child below age two (2) are identified. This information becomes the basis for determining production targets and wait lists. The numbers of elderly, handicapped and families with children child below age two (2) are converted into percentages of the entire waiting list which should correlate to production data. The percentage of owner-occupied and renter-occupied units weatherized should also correspond to their percentage of the waiting list. Sub-grantees have the option to further prioritize services to high energy use/energy burden consumers by submitting agency specific plans during the work plan and budget approval process.

Single family units will receive at least 70% of all services (refer to Multifamily Policy). MH sets multifamily (percentage) limits by county using the housing tenure indicated in the LIHEAP or Comprehensive Housing Affordability Strategy data (whichever is more favorable). Each sub-grantee is required to submit a monthly demographic report, which indicates the number of completed units by type - single family, mobile home, and multi-family (5 or more units per site). MH reviews/monitors these reports to maintain its proposed service delivery percentages when serving weatherization clients.

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V.4 Climatic Conditions

According to a chart titled "District Heating Factors For the United States", Maine's climatological conditions vary between 1.75 in Southern Maine to 2.25 in Northern Maine. This ranking demonstrates the severity of Maine's winters, as well as the actual number of heating degree days. The Grantee, in order to meet the additional energy needs of those in the northern and western portions of the State, has used a sliding scale of allocation based on actual heating degree-days.

Maine's Energy Audit Tool (ECOS) accounts for localized climatic variances by using weather data from the National Oceanic and Atmospheric Administration (NOAA). Heating Degree Hours are calculated using weather station data associated with each Maine zip code.

V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials

Standards for installation procedures as described in the Maine Weatherization Standards Manual <http://www.mainehousing.org/programs-services/energy/energy-auditor-weatherization-support> shall be utilized to ensure the proper installation of materials. The manual and associated guidance is included under the "Rule" in the ME WAP Subgrant Agreement. The Maine Weatherization Standards Manual is located on the MaineHousing website and copies are made available to all subgrantees. Subgrantees include the MWS in vendor contracts. Measures to be performed will be prioritized in accordance with the Maine Audit System and the Standard Work Specifications and will be compliant with WPN 14-4. This measures selection system applies to all types of dwelling units and is based on instrumented audits interacted with ASHRAE 62.2-2013 based calculations for energy use, actual installation and energy costs and material lifetimes to produce a SIR-driven work order. These calculations will be conducted using a manual spreadsheet as the ECOS audit tool is still using the ASHRAE 62.2 2010. This will be corrected either by upgrading ECOS or the utilization of a new audit tool.

Maine's 7500 to 9800 Degree Day environment mandates consideration of heating needs. Conversely it makes cooling needs insignificant, thus only heating needs are considered in Maine.

Maine requires sub-grantees to utilize, to the degree allowed by law, among other instrumentation: blower doors, combustion analysis equipment, psychrometers, CO analyzers, draft gauges, and digital manometers. We employ infrared and CO2 Analyzers at the state and sub-grantee level for technical assistance and assessment. Mandated tests include blower door tests, combustion efficiency analysis, minimal ventilation

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assessment, fossil fuel appliance CO2 testing and moisture level evaluation.

Maine's energy audit ECOS uses the basic heat loss equation for conductive heat loss, (BTU/hr times area times degrees Fahrenheit over "R") taken from the 62.2-2013 ASHRAE Fundamentals Handbook, for pre and post weatherization energy use. Included in the calculations are Heating Degree Day correction factors and a blower door "N" factor when necessary. The results are checked against actual consumption whenever possible (LIHEAP vendors are required to provide consumption data; clients are asked to provide fuel bills during the audit). As our database grows any necessary adjustments to our correction factors will be made. Maine's energy audit calculates Savings to Investment Ratios for each contemplated weatherization measure, which reflect local heating degree day figures and a heating degree day correction factor.

Material lifetimes used are the most conservative generally accepted by the industry. They were established by consensus of Maine's Building Technical Committee when developing the algorithms used for the energy savings factors. In ECOS, these lifetimes were updated based on DOE input. Installation costs are established by using actual subcontractor and supplier bids as well as crew installation costs at each sub-grantee.

A SIR is calculated for each contemplated measure. Measures are arranged in descending order of payback by the computer program with any individual measure with a SIR of less than 1 being considered "unallowable" unless paid for with another funding source (non-DOE). It is possible for the sub-grantee to elect to do fewer measures than proposed on any given job as long as measures are accomplished in the order established by the program. However, this is not the preferred practice considering that a home may only be weatherized with DOE funds once in a lifetime.

Projected incidental repair costs are also calculated and added to the total cost. Incidental repair costs are capped at 15% of the total cost of weatherization tasks being completed (conductive+air infiltration+mechanical tasks) in a contract period. Overall calculated SIR for activities excluding health and safety must be equal to or greater than 1. Maine's Audit System is unique in that it assigns an energy savings to air leakage reduction as determined by reduction of the CFM50 figure from blower door testing. As there is no way to accurately predict a post weatherization CFM50 figure, Grantee may waive the SIR requirement for the aggregate of air infiltration measures on a case-by-case basis if the overall payback requirement is not met by the post test

All weatherization work is performed in accordance to DOE approved energy audit procedures and 10 CFR 440 Appendix A.

III.

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Audit Procedures and Dates Most Recently Approved by DOE

Single-Family : 6/4/2014 - ECOS

Manufactured Housing : 6/4/2014 - ECOS

Multi-Family : 6/4/2014 - ECOS

Comments

Maine's Weatherization Assistance Program, which is being utilized statewide, consists of the following components:

- An Individual Audit for Each Dwelling Unit
- Energy Savings Calculations Based on ASHRAE Fundamentals
- A Comprehensive Health and Safety Protocol

Prior to initiating any weatherization activities, sub-grantees are required to evaluate:

- 1) the physical condition of the home;
- 2) the mechanical systems, and
- 3) building tightness.

If homes fail to meet minimum standards as to Structural Integrity and Health & Safety, weatherization must be deferred until the issue is resolved. Documentation of all activities in the client file is required.

V.5.3 Final Inspection

No dwelling unit may be reported to DOE until the sub-grantee or its authorized representative has performed a final inspection and certified that the applicable work was performed in an acceptable manner. The Weatherization Client File form must be completed. All final inspections are conducted in accordance with 10 CFR 440.21.

V.6 Weatherization Analysis of Effectiveness

Agencies operated successfully throughout the previous grant period. Maine's WAP procedures are working well at all sub-grantees. Estimated energy savings are produced by the ECOS computer assisted audit which also prioritizes all activities in all types of housing addressed by the DOE Weatherization Program.

Beginning with the 1992/93 LIHEAP Contract, Maine has required participating oil vendors to report client fuel consumption annually. Presently, data is received on approximately 47,000 households per year. For carbon quantification purposes, Maine is now comparing weatherized homes to this extensive database. Matched units will be queried for pre and post weatherization energy use in an attempt to quantify overall program effectiveness. As our database grows, we will endeavor to verify individual measures, energy savings predictions, arising from ECOS, Maine's computer assisted audit system.

In addition to the above measuring tools, MH provides a survey to all recipients of weatherization services in which we seek feedback on the effectiveness of the installed measures.

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V.7 Health and Safety

The primary goals for Maine's Weatherization Program are to implement cost effective weatherization procedures to conserve energy and to assess and correct related health and safety hazards as listed on the Hazards Chart. Materials used for the abatement of such hazards not listed in Appendix A of 10 CFR 440 must meet all standards incorporated by reference and made a part of Part 440.

Sub-grantees will be allowed to expend program funds for the abatement of energy related health and safety hazards up to 11.6% of the total per dwelling allowable average or \$800 on average per unit. The \$800 average per unit expenditure limit was based on the following factors:

- Maine has fully implemented ASHRAE 62.2-2013 requirements using a manual Excel application as the current ECOS audit tool is still using the 62.2-2010 version. Therefore, this frequently requires the installation of additional mechanical ventilation (\$400) and programmable switches (\$150-\$200)
- Oil boilers/furnaces: perform CTE on units that have not been serviced within 12 months of audit date (est. cost \$150-\$250)
- Poly ground cover installations under manufactured homes and crawl spaces (\$1/sq.ft.)
- CO monitors

Sub-grantees must manage to the \$800 average over the life of the grant. This allows flexibility to shift funds from homes that need little or no hazard abatement or have benefited from other leveraged monies to homes that have no other resources. It will be the responsibility of the sub-grantee to manage Health and Safety expenditures, which sub-grantees report to MaineHousing monthly as part of the billing process. The Health and Safety costs are excluded from the cost effective calculations of the remaining unit expenditures and must be tracked separately. Health and Safety measures not producing an energy savings factor will be reported as a separate line item on the DOE Weatherization Reporting Form. Any Health and Safety measures that have an energy savings factor do not have to be tracked separately and should be included with the energy conservation measures. Incidental repairs which are "repairs necessary for the effective performance or preservation of weatherization materials" are different from health and safety repairs and, if made to a dwelling unit during weatherization activities, cannot be charged to health and safety expenditures.

The cost of eliminating health and safety hazards, which is necessary before or because of installation of weatherization materials, is an allowable expense. Sub-grantees will be encouraged to leverage other funds whenever possible when addressing non-cost effective tested items. Problems with the dwelling unit that have no connection with weatherization activities can only be addressed with other funding sources such as MaineHousing's Lead Hazard Control Program or its Home Rehabilitation Program. Potential funding sources include, but is not limited to:

- The Central Heating Improvement Program
- CDBG
- MH Housing Programs
- City or Town Assistance
- USDA Rural Economic Development (formerly FHA)
- HUD
- Local church and community groups
- Building Materials Bank
- Habitat for Humanity
- Donations from local businesses
- Landlords

Below is a summary of the Maine WAP Health and Safety Program. Standards on how to comply are detailed in the Maine Weatherization Standards, which have been updated to reflect DOE Weatherization Program Notice 11-5.

A. CLIENT EDUCATION

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The client education component of the Health and Safety program is included with the overall Client Education Component of the Energy Conservation program. Per the Maine Weatherization Standards Manual, the auditor's duties include an evaluation of available information starting with viewing the client application, interviewing the client, and assessing the health and safety of the dwelling. A series of tests as outlined in the Maine Weatherization Standards Manual are performed in order to identify potential health and safety hazards as well as energy conservation opportunities. As outlined in WPN 11-6, the auditor makes the client aware of potential hazards and provides them with appropriate instructions and pamphlets. The client also receives guidance and information on conservation tips, both verbally and through educational pamphlets relating to the subject(s). Some of the educational pamphlets available to highlight Health and Safety Issues include but are not limited to:

- Combustion Pollutants in Your Home
- Safe Homes: Suggestions for Reduction of Pollutant Sources in Private Homes
- The Inside Story - A guide to Indoor Air Quality
- Indoor Air Quality And Your Health
- Background Understanding Indoor Radiation
- Indoor Air Pollution - An Introduction for Health Professionals
- Managing Indoor Air Quality
- A Brief Guide to Mold, Moisture and Your Home
- There are also energy conservation educational videos available that discuss health and safety issues such as:
 - "Cost Effective Weatherization of Mobile Homes in Cold Climates"
 - "The Pressure is on"
 - "Air Sealing Houses"
 - "Mad Air vs. Duct Busters"
 - "Mobile Home Weatherization"
 - "Case Study - Minnesota"
 - "Case Study - Indiana"

The auditor completes a checklist of which topics were discussed with the client and has the client sign the sheet as an acknowledgment of receiving the information. Client Education continues as the home is being weatherized. Crews, contractors, inspectors and other qualified personnel explain various related concepts as the work progresses. Clients are always encouraged to contact appropriate agencies after weatherization if they have any questions, concerns, or wish to report feedback on the conservation efforts.

B. DEFERRAL OF SERVICES POLICY

When conditions are discovered that are too hazardous for the client or weatherization personnel for weatherization procedures to commence, a deferral of services policy has been developed. "Deferral" does not necessarily mean that the client will not receive weatherization services but that until the conditions are rectified, the weatherization services are temporarily postponed. Sub-grantees must attempt to refer the client to alternative resources. Once rectified, the home can be weatherized. Unfortunately there may be extreme cases where the problem is beyond the scope of the available funding and/or a case where the client is not willing to cooperate. In either case an agency must determine what is in the best interest of all concerned and proceed accordingly, ensuring appropriate documentation is in the client file. See attached Deferral of Services Notice.

C. GRANTEE HEALTH AND SAFETY

Grantee health and safety related costs will be charged to either the administrative or training and technical assistance cost category. Grantee must follow all OSHA safety regulations, and National, State and Local codes as further described under Agency/Contractor Safety.

D. AGENCY/CONTRACTOR SAFETY

Sub-grantees must comply with Occupational Safety and Health Administration (OSHA) requirements in all weatherization activities. When contractors are employed by local agencies those contractors are expected to comply with OSHA requirements as well. The contractor costs to comply with OSHA, as applicable, are part of the bid price. Related costs for sub-grantees to comply with OSHA requirements may be charged under 440.18 as health and safety, tools and equipment, incidental repairs, etc.

The Maine Weatherization Program expects the crews, contractors, and other field personnel to be able to work under conditions that do not jeopardize their own health and safety. Weatherization personnel shall be properly trained in workplace safety and will be provided with necessary protective equipment. All weatherization workers must comply with EPA's Renovation, Repair and Painting Rule (RRP) and at least one person on each weatherization crew (includes both subcontractor crews and sub-grantee direct hires) must be trained in lead-safe weatherization.

Sub-grantees and contractors are expected to follow the requirements of CONSTRUCTION INDUSTRY OSHA SAFETY AND HEALTH

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STANDARDS (29 CFR 1926/1910). Some of the standards include but are not limited to:

- Lead in Construction 1926.62
- How to Prepare for Emergencies in the Workplace
- Employees Guide to: Respirator Safety
- Personal Protective Equipment
- Machine Guarding and Hand and Power Tool Safety
- Hazardous Waste and Emergency Response
- Ladders 1926.1053
- Scaffolds 1910.28
- Electrical Safety

Sub-grantees must comply with the OSHA Hazard Communication "Right To Know Program". The program requires chemical manufacturers or importers to assess the hazards of chemicals which they produce or import. It also requires that all employers provide information to their employees about the hazardous chemicals to which they are exposed, by means of a hazard communication program, labels and other forms of warning, material safety data sheets, and information and training. Sub-grantees must follow the record keeping requirements for Occupational Injuries and Illnesses.

Sub-grantees are responsible for maintaining agency vehicles so that they are in safe and proper operating condition.

Sub-grantees are responsible for ensuring all work performed in client homes abides by federal, state, and local codes and regulations.

MaineHousing verifies contractor and sub-grantee compliance with OSHA 10 & 30, MSDS, LSW, and RRP requirements as follows:

- As part of the annual bid process, contractors are required to submit LSW and RRP certifications. MaineHousing reviews this documentation to ensure compliance.
- MaineHousing conducts in-progress monitoring inspections to verify compliance with OSHA 1910 and 1926, LSW, RRP, and reviews/comparates MSDS info to actual products being installed.
- MaineHousing conducts client interviews to confirm that they received MSDS information prior to the installation of WAP measures.

E. CLIENT HEALTH AND SAFETY

Client Health and Safety is a priority for Maine's Weatherization Program. Through DOE trainings, related trainings at the New England Weatherization Training and Educational Center, and field training, Maine has developed a comprehensive plan to ensure safety in energy related areas. Sub-grantees are required to have the proper equipment to perform the necessary weatherization tests. Agency personnel are required to attend trainings as determined necessary. Homes constructed prior to 1978 are presumed to contain lead paint. All weatherization clients residing in homes constructed prior to 1978 will receive the EPA pamphlet "Protect Your Family from Lead in Your Home" at least 10 days prior to the commencement of any weatherization activities.

Maine's Building Technology Committee meets on a monthly basis to discuss all aspects of the weatherization program. The committee consists of a technical representative from each sub-grantee. Through this venue sub-grantees are continually updated with information and techniques regarding energy conservation and health and safety issues. This system ensures that all sub-grantees are receiving the same information and creates consistency for a quality program across the state.

The Weatherization and CHIP programs work in unison to guarantee "A HOUSE AS A SYSTEM" approach for the Weatherization Program.

All sub-grantees have blower doors, digital manometers, CO2 testers, heating system efficiency testers, and hygrometers, as well as other test equipment. All weatherization personnel are required to be trained in Energy related health and safety issues and indoor air quality problems. Testing and corrective procedures requiring special licensing on a State level will be referred to the appropriate authority.

Types of Hazards and Corrective Procedures (see Hazards Chart - adopted chart in DOE Notice 11-6)

The chart is a quick reference of a majority of conditions that the State regards as hazardous. In all cases these conditions will determine the course that weatherization will take. The chart outlines the hazard, the importance of correction, if postponement of weatherization services is necessary, types of testing, and corrective procedures for each hazard.

A. ASBESTOS

"Asbestos" describes six naturally occurring fibrous minerals found in certain types of rock formations. When mined and processed, asbestos is typically separated into very thin fibers that are normally invisible to the naked eye. They may remain in the air for many hours if released from asbestos - containing material and may be inhaled at this time. Three specific diseases-asbestosis (a fibrous scarring of the

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lungs), lung cancer, and mesothelioma (a cancer of the lining of the chest or abdominal cavity) - have been linked to asbestos exposure. It may be 20 years or more after the exposure before symptoms of these diseases appear; however, high levels of exposure can result in respiratory diseases within a shorter period of time.

According to the EPA's "Building Air Quality" guide, the mere presence of asbestos in a building does not mean that the health of a building occupant is endangered. Asbestos-containing material in good condition, not damaged or disturbed, is not likely to release asbestos into the air.

In residential homes asbestos was generally used as an insulating material on heating systems, steam and hot water pipes, and duct work. Asbestos usually appears as a white-caulk type of substance used in a plaster form or contained in corrugated insulation sleeves.

Asbestos in siding, walls, and ceilings: DOE WAP funds may be used to remove/replace asbestos siding for purposes of wall cavity insulation, if allowed by state and local codes. Weatherization personnel are advised to identify and assess the condition of asbestos during the audit process and to take all precautions not to disturb asbestos-containing materials throughout the weatherization process. Sub-grantee must inform the client that suspected asbestos siding is present and what precautions will be taken.

Asbestos in vermiculite: DOE WAP funds may be used for encapsulation by an appropriately trained asbestos control professional. Removal is not allowed. Sub-grantee must instruct clients not to disturb suspected asbestos containing material. Additionally the sub-grantee must provide asbestos safety information to the client.

Asbestos on pipes, furnaces: DOE WAP funds may be used for encapsulation by an AHEARA asbestos control professional. Sub-grantee must instruct clients not to disturb suspected asbestos containing material. Additionally the sub-grantee must provide asbestos safety information to the client.

DOE WAP funds cannot be used for asbestos removal. Major asbestos problems should be referred to the appropriate State agency and/or EPA.

If the sub-grantee suspects the presence of asbestos, they must provide client education about asbestos and the precautions that will be taken.

B. BIOLOGICALS/MOLD

DOE WAP funds can be used to remediate conditions that may lead to or promote biological concerns and unsanitary conditions. DOE WAP funds cannot be used for the removal of mold, odors, viruses, bacteria, unsanitary conditions and rotting wood. Deferral will be necessary in those situations where a known agent is present in the home that may create a serious risk to weatherization workers or household occupants. Sub-grantee must inform client of observed conditions and provide information on how to maintain a sanitary home and steps to correct deferral condition.

C. MOISTURE

A thorough moisture assessment of the client home is done during the audit process and conditions are noted on the ECOS Field Form or MEAFF. The Usual Sources of Moisture Problems are:

- a. Interior moisture generated by client behavior (showering, cooking, floor washing, use of unvented combustion appliances, etc.).
- b. Interior moisture migrating up through the house from damp basements or dirt crawl spaces.
- c. Bulk moisture entering from the exterior of the house from shell problems.

The more airtight a house is the less air changes per hour occur, consequently lessening the ability to dry out the humid indoor air. Although a tight home is good for energy conservation purposes, it can be a problem if there is no way to exhaust the moisture that is produced and trapped inside the house. In colder climates, interior moisture that escapes through holes or bypasses can cause structural degradation by condensing on cold outer surfaces, slowly rotting the wood. Moisture can condense on cold interior surfaces that are not insulated properly or that are deprived of heat circulation. This is generally the root of the biological problems and structural problems relating to weatherization activities.

1. The Assessment Process is as follows:

- The Client Interview: The auditor asks a series of questions about household activities, client health, landscape problems, and structural problems that may indicate moisture problems.
- Visual Inspection: The auditor starts the assessment process upon driving up to the house. Condensation on windows, a buckling roof, lack of gutters, ground sloping towards the house, and peeling paint are just some of the indications of trouble. Inside the house, musty

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smells, mold and mildew, blackening roof sheathing, plumbing leaks, and damp basements are additional signals of moisture problems the auditor records in the ECOS Field Form or MEAFF.

- Measuring Humidity Levels: The auditor uses either a sling psychrometer or a digital hygrometer to measure humidity levels in different portions of the house.
- Blower Door Testing: A Blower Door Test is done to determine the tightness of the house as well as assessing leakage areas. It is understood that the chart and the formulas quantify tightness limits to ensure adequate fresh air for people to breathe in normal living conditions. The limits do not allow for poor indoor air quality or guarantee adequate combustion air for appliances.

2. Corrective Procedures and recommendations:

- Client Education: Sub-grantee must provide client notification and disclaimer on mold and moisture awareness.
- Eliminate/reduce Source: utilizing moisture control activities such as groundcovers, sealing shell bypasses, diverting bulk moisture, sump pumps, etc. (DOE WAP funds may be used).
- Mechanical Ventilation - exhaust only, fresh air intakes, balanced mechanical whole house ventilation systems (DOE WAP funds may be used)

D. COMBUSTION APPLIANCES AND COMBUSTION GASES:

MaineHousing recognizes that combustion gases in homes pose the most serious hazard. As a result, we have adopted a comprehensive plan to ensure safe operation of combustion appliances and to make sure that weatherization procedures do not contribute to a problem.

Some of the harmful products of combustion are dust, nitrogen oxides, and carbon monoxide. While all of these products are harmful, carbon monoxide (CO) is deadly. CO is a highly toxic, lighter than air gas that is produced when there is insufficient oxygen to allow for complete combustion of the fuel in use is very dangerous because it is colorless, odorless, tasteless, non-irritating, and virtually impossible to detect without test equipment. Carbon monoxide is a cumulative poison that slowly builds up in the bloodstream; it combines with blood hemoglobin and replaces the oxygen in the bloodstream until there is too little oxygen to support life.

The State views any ambient level of CO as potentially dangerous and will be considered a warning signal that a problem exists. According to ASHRAE Standards, the maximum allowable concentration for short term exposure is 9 ppm in residential settings.

*Caution: Test results may vary during different seasons of the year and different weather conditions. Low levels of CO measured in the exhaust stream of the combustion appliance does not guarantee that there will not be a problem under different conditions.

1. Client Education: Informational pamphlets are distributed and verbal discussions take place on a case by case basis concerning combustion appliances. The sub-grantee informs the client about the importance of using exhaust ventilation when cooking and the importance of keeping burners clean to limit the production of CO.

2. Test Equipment:

- CO Tester
- Various Heating System Efficiency Test Kits
- Digital Manometers
- Pressure Pans
- Smoke Gun

3. Testing Procedures:

All houses with combustion appliances and/or fireplaces will be tested to the degree allowed by law and results will be noted on the ECOS Field Form or MEAFF. All Testing procedures are listed in the Maine Weatherization Standards Manual.

1. CO in Flue: Houses with CO levels in the flue of combustion appliances (with the exception of wood and coal) higher than 50ppm will not be weatherized until system is evaluated by a licensed technician.
2. Ambient CO: Houses with ambient levels of CO higher than 9ppm will not be weatherized until the source is mitigated. This could be the result of an unvented gas cook stove. Burners and ovens producing greater than 15ppm should be cleaned or serviced. Kitchen ventilation must be installed if possible. Building tightness limits will be influenced by households of cigarette smokers.
3. Backdraft Test (Worst Case)
4. Draft Test
5. Efficiency Test
6. Pressure Balancing

4. Corrective Procedures: Corrective procedures may include any of the following:

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1. Client Education
2. Deferral of Services
3. Refer heating system issues to the CHIP program
4. Repair heating appliances (DOE WAP funds may be used)
5. Correction of draft problems; proper venting to the outside if testing indicates a problem (DOE WAP funds may be used)
6. Combustion Air Evaluation and correction (DOE WAP funds may be used)
7. Pressure Balancing

Corrective procedures requiring special licensing will be referred to the appropriate authority.

5. CO Alarms:

CO Alarms must be installed in homes with combustion appliances where no operable CO alarm is present. This is an allowable expense under DOE WAP.

6. Other Funding Sources:

A majority of the heating system work to repair or replace "red tagged", inoperable, or malfunctioning heating systems will be referred to the Central Heating System Improvement Program (CHIP). Other funding sources should be utilized when possible.

DOE Health and Safety monies, keeping within the allowable averages, can be used as necessary to address repairs. If/when Maine's audit tool, ECOS, is approved by DOE for heating system replacements, Maine will allow for replacement using DOE WAP funds, unless prevented by other guidance. Maine's harsh climate, high heating degree day environment, justify the repair of inoperable or malfunctioning heating systems under DOE WAP.

E. AIR CONDITIONING AND HEATING SYSTEMS

DOE Health and Safety monies, keeping within the allowable averages, can be used as necessary to address heating system repairs. If/when Maine's audit tool, ECOS, is approved by DOE for heating system replacements, Maine will allow for heating system replacement using DOE WAP funds, unless prevented by other guidance. Maine's climatological conditions vary between 1.75 in Southern Maine to 2.25 in Northern Maine. This ranking demonstrates the severity of Maine's winters, as well as the actual number of heating degree days. Maine's harsh climate justifies the repair of inoperable or malfunctioning heating systems under DOE WAP.

Because of Maine's high heating degree day environment, cooling needs are considered to be insignificant for Maine dwellings. Therefore, Maine climate conditions do not warrant defining at-risk occupants or the repair or replacement of air conditioning systems under DOE WAP.

E. FORMALDEHYDE AND VOLATILE ORGANIC COMPOUNDS (VOCs)

DOE WAP funds may be used to remove pollutants if it presents a hazard for workers. If pollutants pose a risk to workers and removal cannot be performed or the client does not allow its removal, deferral of services is required. Sub-grantee must inform client of observed condition, associated risks, and safety and proper disposal of household pollutants.

F. EXISTING OCCUPANT HEALTH PROBLEMS

Sub-grantees are advised that certain weatherization procedures may aggravate some existing health problems that clients may have. The Auditor will identify such conditions during the client interview and make special arrangements if necessary to accommodate the client's situation. The sub-grantee must provide client information of any known risks and worker contact information so client can inform of any issues.

G. LEAD PAINT

Homes constructed prior to 1978 are presumed to contain lead paint. All clients residing in homes constructed prior to 1978 will receive the EPA pamphlet "Protect Your Family from Lead in Your Home" at least 10 days prior to the commencement of any weatherization activities. All weatherization workers, contractors and subgrantees installing measures in pre 1978 homes must comply with the EPA's Renovation, Repair and Painting (RRP) Rule and must follow lead-safe weatherization practices. DOE WAP funds cannot be used for the abatement of lead paint.

In addition to requiring lead-safe work practices, MH has required all of its sub-grantees and their private contractors to purchase Pollution Occurrence Insurance (POI). MH will monitor all subgrantees and private weatherization contractors to ensure they carry this insurance.

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Subgrantees retain documentation in their program files that all renovators and firms have current lead paint certification.

H. RADON

Radon is a radioactive gas produced by the decay of radium. It occurs naturally in almost all soil and rock. Radon migrates through the soil and groundwater, and can enter the building through cracks or other openings in the foundation. Radon's decay products can cause lung cancer and is second only to smoking as a cause for lung cancer in America.

General weatherization procedures, such as reducing stack effect and relieving negative pressures in the combustion appliance zone (usually the basement), are beneficial for reducing the entry of radon gases. Negative pressures in the basement relative to outdoors will draw any gases, water, water vapor and cold air, into the basement. Program testing procedures and corrective measures outlined in the procedures manual describe corrective steps to take when faced with negative pressures in the combustion appliance zone.

Identification of radon levels through appropriate testing will be allowed with DOE Health and Safety monies in areas that the potential for Radon is high. Radon concentrations vary greatly across Maine. Consequently, sub-grantees will be encouraged to develop procedures for their area that will allow for the identification of unsafe Radon levels.

Sub-grantees provide client with EPA Consumer's Guide to Radon.

I. UNVENTED SPACE HEATERS

Operation of unvented gas and liquid fueled space heaters can negatively impact indoor air quality through indoor air pollution. Indoor pollutant concentrations resulting from the use of unvented space heaters can vary significantly from house to house depending on the operation of the space heater and the infiltration/ventilation rates of the residential structure in which it is placed. Poorly adjusted heaters produce substantially greater quantities of carbon monoxide (CO), aldehydes and particulate than properly adjusted units. Inadequate ventilation may result in rapid buildup of all pollutants including harmful levels of CO.

In addition to the production of toxic by-products, unvented space heaters release water vapor equivalent to 8 to 11 gallons of water into the heated space for each million BTU of energy delivered. Water vapor condenses upon contacting cool surfaces, creating a source of mold growth and contributing to premature rotting of building materials. Mitigation methods include eliminating the source of water vapor, providing adequate ventilation, raising surface temperatures by proper insulation techniques and/or by circulating conditioned air.

MaineHousing's policy for unvented space heaters is as follows: A home that is utilizing an unvented space heater will not be weatherized. Client Education will be used to explain the consequences of space heater use. The deferral of services form must be used. Once the client has agreed that they understand the policy and will not use the heater, weatherization can commence. Cases where space heater usage is necessary (it's the only heat source or it compensates for inadequate distribution of heat by a central heating system) should be referred to the CHIP program for correction.

J. BUILDING STRUCTURE

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

Sub-grantees will ensure that weatherization-related work will be in conformance with the applicable codes in the jurisdiction where the work is being performed.

1. Knob and Tube Wiring (KTW): - A Memorandum issued by DOE 10/21/1988 (which supersedes DOE guidance on KTW dating 7/25/1983 and 7/13/1988) states that work is to be in conformance with the applicable codes in the jurisdiction where the work is being performed.
2. Circuit Overloading: - Auditors and crews should be on the lookout for circuit overloading and should notify the owner and note the problem in the client file. To the extent that these problems prevent adequate weatherization, the deferral of services form should be completed and repair should be considered by the agency on a case by case basis.
3. Miscellaneous Wiring Hazards - See Hazards Chart.

DOE WAP funds may be used for minor electrical repairs and adequate shielding of KTW.

K. VENTILATION

ASHRAE 62.2-2013 is required to be met to the fullest possible extent. This application is not required where acceptable indoor air quality exists as defined by ASHRAE 62.2-2013. Existing fans and blower systems should be updated if not adequate.

K. DIAGNOSTIC EQUIPMENT

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Diagnostic equipment, such as blower doors, should not be used on units where such equipment could exacerbate existing problems.

L. ABATEMENT MATERIALS - See Hazards Chart.

M. ABATEMENT COSTS - See Hazard Chart.

Maine WAP Health and Safety guidelines are outlined in the Maine Weatherization Standards (Section 4). These standards have been updated to incorporate guidance provided by DOE in Program Notice 11-6.

V.8 Program Management

V.8.1 Overview and Organization

The Maine State Housing Authority (MH), created in 1969, is Maine's housing finance agency. Its primary mission is to provide and help maintain affordable housing. Its mission statement reads: "The mission of the Maine State Housing Authority (MH) is to assist Maine people to obtain and maintain decent, safe, affordable housing and services suitable to their unique housing needs." In carrying out this mission, MH will provide leadership, maximize resources, and promote partnerships to develop and implement sound housing policy.

Since its inception, the agency has provided housing for low and very low income renters and the opportunity for low and moderate income Maine families to purchase their own homes. In the more recent past, MH has expanded its programs to meet new challenges posed by various housing needs: people who are homeless; people with special housing needs (such as mental health consumers); the elderly; low income homeowners who cannot afford basic home repairs; and others.

The State of Maine developed the nation's first Weatherization Program in 1973 in response to the energy crisis that gripped the northeast and caused economic hardship across the country. Maine's Weatherization program became the model used in developing funding for a program in every state in the nation. The program was originally administered by the Division of Community Services, an Executive Department agency. It was re-assigned to the MH in 1991.

By its nature, MH rarely serves its customers directly. It places a heavy reliance on its partners to deliver its programs and services to the low income and working households that it serves. These partners include real estate professionals and lenders, non-profit organizations, other government agencies (in particular, DECD & Human Services,) municipalities, for-profit corporations, private developers, private landlords, management corporations, and Community Action Agencies (CAAs). With offices located throughout the state, 9 of Maine's CAAs serve as sub-grantees for the DOE Weatherization and Low Income Home Energy Assistance Programs (LIHEAP).

Weatherization has served as MH's cornerstone to providing thousands of Maine homeowners and renters with funds to repair and improve their homes. CDBG, FedHome and other state and federal sources of funds are being used in conjunction with Weatherization to address this home repair crisis. MH has consistently designated 15% of its LIHEAP grant to weatherization and heating system repair programs.

The State of Maine WAP may allow up to an additional five percent (5%) administrative funding for sub-grantees which qualify based on the following criteria:

1. As required by federal regulations, the sub-grantees must receive less than \$350,000 for their total annual sub-granted amount.
2. Sub-grantee budgets must reflect reasonably expected administrative costs for the new grant period which are in excess of the 5%. These expected costs should be based on the best information currently available.
3. The sub-grantees must have no uncorrected audit or monitoring findings regarding the allocation of costs to the DOE sub-grant for the most current period available.

V.8.2 Administrative Expenditure Limits

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Any sub-grantee meeting all three of the above criteria may receive increased administrative funding, not to exceed 10%, based on actual costs incurred. The grantee will require the sub-grantees to submit a letter of application for additional administrative funding. This letter must address the impact on production and the need for the additional administrative funds as well as the three criteria shown above.

Allocation of the funds for the current Program Year show all sub-grantees at 5% administration. (See Annual File - Part A) Once all sub-grantee budgets are reviewed and approved, the grantee will file an amendment to this state plan, reflecting actual budgeted administrative costs.

V.8.3 Monitoring Activities

The monitoring approach under the Maine WAP will be to work closely with sub-grantee personnel to ensure continued quality workmanship and to ensure adequate financial systems and procedures. The Maine WAP will administer Quality Control Inspections in accordance with the SWS and 10 CFR 440 using a both the Independent QCI and the Independent Auditor/QCI options. This will enable our smaller subgrantees to utilize a process which allows for smaller existing staffs. In all cases QCIs will be subgrantee employees and the Grantee will perform quality assurance reviews of at least 10% of all completed units. 42.84% of Grantee administrative and 27.18% of Grantee T & TA funds are allotted for monitoring activities. Comprehensive coverage of all sub-grantee WAP activities is achieved by a combination of regularly scheduled grantee efforts:

1. Administrative and fiscal monitoring - annually
2. Onsite inspection of completed units - monthly
3. Client file review - monthly
4. Review of sub-grantee workplans, budgets, and reported results - ongoing
5. Review of independent sub-grantee annual audits - annually

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MH no longer uses the DOE sub-grantee Monitoring Instrument as our primary tool for administrative monitoring. MH has developed its own monitoring tool that includes reviews of the sub-grantee OMB Circular A-133. Among other things, MH has determined that the DOE monitoring tool duplicates many financial and compliance audit requirements under OMB Circular A-133 (Audits of State, Local Governments, and Non-Profit Organizations) which all sub-grantees must have their independent auditors perform annually. MH routinely reviews sub-grantees' annual independent audits.

1. Administrative/Fiscal Monitoring

MH's Energy and Housing Services Department (EHS) will perform comprehensive administrative and fiscal monitoring of each WAP sub-grantee on an annual basis using the Compliance Review - Administrative Monitoring Tool. During the annual Administrative and Fiscal audit, MH conducts a 10% file review of sub-grantee's production. If a significant issue is cited MH will expand the sample size.

The EHS Grant Management Compliance Specialist addresses the following areas of performance under DOE Weatherization:

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- Annual Financial Monitoring review
 - Financial/Fiscal Accountability
 - A-133 audit
 - General ledger
 - Payroll/Personnel/Timecards
 - Vehicles and equipment purchases
 - Procurement
 - Indirect rate
 - Invoicing
 - Record retention
 - Corrective action plans
 - Contractor payments
- Annual Production File Review
 - Procurement process
 - Energy audits
 - Eligibility
 - Proof of ownership
 - In progress and final inspections
 - Contractor invoices
 - Release of liens
 - Scope of work

Each comprehensive monitoring visit will include an exit interview during which the EHS Grant Management Compliance Specialist shall apprise sub-grantee personnel of pertinent findings and recommended improvements, as applicable. Within 30 days of administrative/fiscal monitoring visit, EHS will prepare a report to the sub-grantee summarizing these findings and requesting corrective actions. Additionally, the Grant Management Compliance Specialist will perform a six (6) month follow-up review of corrective action plans, if applicable.

If significant issues are identified, MH requires the sub-grantee to submit a corrective action plan for MH's review/approval. MH will conduct a six (6) month follow-up review to ensure the plan was executed and effective in addressing the issues.

2. Technical Monitoring

EHS Technical Service Specialists will perform onsite inspections of completed and in-progress units throughout the state on a monthly basis. They will inspect a minimum of 5% of each sub-grantee's completed weatherized units (with DOE funds) in the program year. If significant issues are identified, the Technical Services Specialists will expand the percentage of inspected units. Criteria for unit inspections will be:

- Maine Audit System
- Maine Weatherization Standards Manual
- Program Guidance
- Department of Energy Regulations

Within 30 days of the site inspection, the grantee monitor submits a Unit Inspection Report to the sub-grantee. These reports include findings and any required corrective actions, communications with the client and contractor, observations and an assessment of the auditor's performance. If a rework is ordered, the sub-grantee will have sixty (60) days to complete the rework and notify EHS, in writing, of its completion. The sub-grantee may also contact the Director of EHS in writing during this sixty (60) day period to appeal a rework finding. The unit will be revisited by the Director of EHS, a Housing Council representative, the grantee monitor, and a sub-grantee representative to resolve the dispute through actual onsite observations and discussion of discrepancies.

If the rework ordered is not rescinded following this appeal process, the sub-grantee will have sixty (60) days from the date of the appeal resolution to complete the rework.

If reworks are not completed within sixty (60) days, and the sub-grantee has not demonstrated

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reasonable cause for delay, a billing adjustment will be made for the entire dwelling unit. The unit will not be reinstated until the rework has been completed.

If there are significant deficiencies identified, such as health and safety violations, poor quality installation of materials, major measures missed, then the grantee will require the sub-grantee to take appropriate corrective action to resolve the outstanding issues within 60 days. The grantee monitor will increase the number of units reviewed and frequency of monitoring visit to the sub-grantee until there are assurances that all deficiencies have been resolved.

Sub-grantees are required to submit corrective action plans when there are indications that the subgrantee has significant compliance issues.

In addition to the onsite (technical monitoring), the Technical Service Specialists will conduct a desk/file review of the completed units submitted by each sub-grantee. This practice allows the grantee to closely monitor best practices, identify concerns, and select/prioritize units for onsite inspections.

3. Review of Sub-grantee Work Plans, Budgets, and Reported Results

Before the beginning of the grant, MH will require each sub-grantee to submit a detailed Work Plan and Budget for performance of DOE Weatherization. No funds will be advanced to Sub-grantees until such Work Plans and Budgets are reviewed and approved by EHS staff.

EHS will perform comparisons of sub-grantees monthly billings versus their approved budgets to identify financial or compliance variances. EHS staff will work with sub-grantees to correct/understand variances as they are identified during this process.

4. Review of Independent Sub-grantee Audit

Each sub-grantee will have an audit of their financial statements and an A-133 compliance audit conducted by an independent CPA firm following the close of the sub-grantee fiscal year. These audits will comply with all regulations pertaining to DOE WAP and will be made available to grantee management. MH's Grant Management Compliance Specialist evaluates/reviews the results of these audits on an annual basis.

Sub-grantee must provide written assurance that corrective action has been taken or present a plan to correct any noted deficiencies within sixty (60) days. During and following this sixty-day corrective action period, grantee staff will offer and be available for training and technical assistance as needed by the sub-grantee.

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V.8.4 Training and Technical Assistance Approach and Activities

The goal of Maine's WAP is to enhance the efficient operation of this program and to ensure the effectiveness and quality of the work performed. The desired result of these efforts is to conserve more energy and to accomplish greater savings in heating costs for the low income residents of Maine.

The role of training and technical assistance is to provide specific activities to enhance the skills of personnel at the grantee and sub-grantee level. The desired result of all T&TA activities will be to maximize energy savings, minimize operating costs, improve management and administrative procedures, and prevent waste, fraud and abuse.

The Maine training plan is being developed to transition to the use of IREQ accredited training providers beginning in PY 2015. This has not been easy due to the lack of an accredited site in the State of Maine. This makes for extensive travel on the part of trainers or trainees adding to the cost and loss of production time. To assist in setting a path for compliance in training EHS has sought assistance from DOE T&TA staff. As a result of this assistance, we have followed up with Kelly Cutchin of SMS who offered much valuable insight and information on training requirements. EHS anticipates that further developing this relationship with a hope that her expertise in WAP training will become a great asset.

EHS has participated in a video conference with the New Mexico Energy Smart Academy regarding the Standard Work Specification "Deck of Cards" that incorporate the National Standards Work Specifications (SWS), which define performance requirements for a particular task, into a DOE WAP field guide to be used as a tool for WAP training, implementation, and inspection. This Deck of Cards is being utilized by a consortium of states in implementation of their WAP. Maine is very interested in joining the consortium and utilizing this tool. The one-time user fee is \$4,999 and is included in our PY 2014 T&TA budget.

Another challenge currently faced by EHS concerns our ECOS database used for management of all aspects of our WAP program. ECOS has had conditional DOE approval since 2011 and has been a source of concern to EHS and our subgrantees. In January 2014 we re-submitted ECOS to DOE seeking final approval but recently received notice that once again ECOS had received a 6-month conditional approval, pending several areas that needed corrections.

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EHS has spent considerable time and effort in researching alternative tools to use in our WAP program, including demonstrations, correspondence, talking to other states, etc. As it stands now management has indicated that a demonstration of ECOS II will be forthcoming in September. Attendees will include EHS and subgrantee staff. Until a final decision can be reached it is difficult to align the new QWS with an identified database. For budgetary purposes we have included costs associated with development and training. The training plan of Maine WAP incorporates results of EHS field monitoring visits and is demonstrated by the inclusion of technical health and safety training listed below. Areas of air quality, combustion appliance safety and ventilation have been identified in those visits and will be included in the training. In addition, the necessity of attending the WIPFLI Financial "Supercircular" training was identified in connection with the EHS auditor meeting with subgrantee fiscal directors during on-going meetings regarding ways in which to improve WAP performance, reporting, record keeping and compliance.

Currently all Maine WAP estimators, inspectors and installers are required to obtain a recognized Energy Auditor certification within six (6) months of employment in the WAP and this maintained on a master list. Current plans are for BPI certification of all staff as Quality Control Inspectors.

What we have laid out for our 2014 Training and Technical Assistance we see as important steps in preparation for PY 2015. All training sessions will be mandatory for applicable EHS and WAP staff. The following components are to be included:

1. BPI Quality Control Inspector training and certification for approximately 26 staff of EHS and the CAA Subgrantees. Gaining this certification is critical for beginning in PY 2015 all completed units must be inspected by a BPI Quality Control Inspector prior to billing. Currently EHS is exploring options as to where this training will take place and this is presenting challenges due to a lack of available IREQ accredited training sites in our area. Despite this, it is anticipated this training will be completed by February 1, 2015. We are targeting the training to be held in Maine, if possible to reduce downtime and travel expenses. A REP is almost complete which will be used to solicit proposals from IREQ accredited training centers. This should be sent out the week of September 8, 2014. This training will be funded using a combination of \$40,000 in T & TA funds and \$55,000 in other non-DOE funds. The total cost of \$95,000 is an average of several training providers, websites and phone follow ups with BPI certified training facilities, which are unfortunately all located out of state.

2a. Financial training through attendance at a WIPFLI Financial "Supercircular" Training to be held this fall in Portland, Maine. This training is important for grantees and subgrantees to better understand the numerous changes to financial regulations in Federal programs. We are anticipating attendance by 60 staff with a cost of \$9,618. This amount is determined by prorating 40% of the attendance cost for all attendees.

2b. Financial training to build a solid foundation in the government-wide requirements, agency regulations, and grants management best practices.

3. Technical health and safety training will be provided to subgrantee technical staff aimed at improving the indoor air quality and environment of the home to be weatherized and will be consistent with WPN 11-6. Centering on diagnostic testing the training will emphasize combustion appliance safety and carbon monoxide abatement, space heaters, lead safe work practices, asbestos, radon, moisture control, building tightness assessments, and exhaust fans and added ventilation. All efforts will be made to utilize an IREQ accredited trainer. Expected participation will include 24 grantee and subgrantee staff. The estimated cost of \$22,000 is based on past training events and discussions with industry professionals.

4. Subgrantee training on the new Quality Work Standards will detail the numerous changes to the QWS for the FY 2015 program. This training will include EHS technical staff and subgrantee staff. We will seek to use an IREC accredited trainer to ensure that the all aspects are compliant with DOE standards. The estimated cost of this training is \$25,000 based on past training events.

5. Contractor and crew training on the new Quality Work Standards will be undertaken for the approximately 25 contractors and crews utilized by the subgrantees for field work in the Maine WAP. We will work with an IREC accredited trainer to create a hands-on session aimed specifically at field staff. Maine WAP has never secured a "retention agreement" from participating contractors and it is a concern in that it could further limit our pool of contractors. We will work with our DOE Program Officer on this issue. The estimated cost of this training is \$24,600 based on past training events.

6. Quality Management Plan training. EHS would like to work with an IREQ accredited trainer to develop Phase I sessions for all EHS and subgrantee staff involved in the various aspects of WAP management. This training will emphasize core competencies for all job classifications and include a basic exam. We would like to jump start this process to

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ensure that the WAP program is professionally and competently managed in a fully accountable and transparent manner. Eventually, the end goal would be a certification requirement for all Maine WAP workers which would require on-going re-certification at future dates. We have set aside \$20,000 for this beginning initiative.

All sub-grantees will be required to submit a T&TA workplan with their budget for grantee approval. These workplans will identify and address T&TA needs at their agency. A standard outline will be provided to all sub-grantees setting forth the areas required in their workplans. The grantee will review the workplans and budgets to determine whether the sub-grantees are complying with the outline as well as the standards stated above. The grantee will also coordinate and provide all sub-grantees with the current developments in technical procedures and DOE guidance on technical issues. Through these procedures, the grantee will ensure consistency in the sub-grantees' procedures as well as identifying needs of individual sub-grantees. The grantee will expend every effort, through monitoring and management activities, to ensure that Maine continues to operate a quality WAP.

The grantee will continue to conduct surveys of all sub-grantees and solicit input from grantee staff to identify training needs. This information is utilized to determine which topics the grantee and sub-grantees will schedule for trainings during this and future grant periods. The results of the survey will be shared with the Maine Community Action Housing Council to assist with their employee and subcontractor trainings and meetings. Maine also relies heavily on information gathered during the monitoring process to determine productivity and energy savings. Monitoring reports are carefully analyzed to prioritize training needs. There will continue to be training such as EPA Certified Lead Renovator training which requires EPA certified trainers and other specialized training as it becomes available (i.e. Maine Indoor Air Quality, Affordable Comfort, etc). MH is notified of these external training opportunities and informs sub-grantees/contractors of them.

The Housing Director of each sub-grantee will notify the grantee and the Housing Council of any and all planned training sessions so that common needs are coordinated and duplication is avoided.

The grantee will fund attendance for sub-grantee and grantee personnel at Department of Energy training conferences as applicable to various technical and fiscal personnel. This is intended to ensure that all sub-grantees obtain information and benefits provided by regional conferences for continued compliance with DOE rules and regulations.

Grantee staff will also provide training on-site as needed in technical and fiscal matters.

The effectiveness of T&TA activities is gauged by:

- review of session evaluation forms,
- feedback from Building Technical Committee and contractor meetings,
- comparison of pre & post training on-site results; and,
- analysis of responses to annual sub-grantee training needs surveys.

Client Education: Per the Maine Weatherization Standards, energy auditors and inspectors are required to provide client/owner education during all phases of the weatherization process. This includes, but is not limited to:

- How the weatherization process will proceed Health and safety issues
- Explanation of energy-conserving measures that will be installed
- Recommendations on how the client can conserve energy
- Explanation of required maintenance for existing equipment, added equipment, or energy-saving measures.

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V.9 Energy Crisis and Disaster Plan

On March 5, 2012, MH received Weatherization Program Notice 12-07 (WPN12-07) from the Department of Energy. The purpose of the DOE notice was to provide guidance on allowable activities using DOE WAP resources in the event of disasters. Allowable expenditures under WAP include: 1) the cost of incidental repairs to an eligible dwelling unit if such repairs are necessary to make the installation of weatherization materials effective; and 2) the cost of eliminating health and safety hazards, elimination of which is necessary before the installation of weatherization materials. The extent that the services are in support of eligible weatherization (or permissible re-weatherization) work. In accordance with WPN12-07, MH may allow sub-grantees to use WAP funds to address disaster related hazards within the following parameters:

1. All repairs or replacements must fall under the definition of Energy Related Repairs or Permissible Health and Safety Activities.
2. Funds shall only be used for "no heat" or heating emergency repairs or replacements. The per unit budget for heating repair or replacement is \$4,000.
3. Properties serviced under this relief plan must have a complete weatherization audit done prior to receiving benefit, and an ECOS audit and estimate must be submitted with the billing.
4. The weatherization portion of the benefit must be completed by the end of program year. If the sub-grantee lacks enough DOE funding then it must commit funds from another source (e.g. LIHEAP) to complete weatherization.
5. Households receiving emergency repairs or replacements will not be counted as completed units under the DOE program until such units have received weatherization services, except if the audit determines that no weatherization work is necessary, then it may be counted as a completed, weatherized unit.
6. Any sub-grantee wishing to participate in the Energy Crisis Plan must provide the Maine State Housing Authority with a written plan to include a budget revision quantifying the expected benefits and costs including sub-grantee support costs and the number of estimated "no-heats" to be served.

In accordance with WAP Rules, MH requires priority be given to identifying and providing weatherization assistance to elderly persons, persons with disabilities, families with children 2 years of age or under, high residential energy users, and households with high energy burdens. However, it would be allowable to consider households located in the disaster area, as a priority as long as the households are eligible and meet one of the established priorities and are free and clear of any insurance claims or other form of

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compensation resulting from damage incurred from the disaster.