

Weatherization Assistance Program Frequently Asked Questions

Updated August 21, 2009

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A. Monitoring and Reporting

1. What are DOE Recovery Act reporting requirements?

Recovery act reporting requirements fall into two broad categories:

- a. OMB reporting requirements
 - b. Program-specific DOE reporting requirements
- OMB reporting requirements *for the quarter ending on September 30* have been finalized. These reports are due to www.FederalReporting.gov on **October 10, 2009**. A full description of these requirements is published at Recovery.gov, on <http://www.recovery.gov/?q=content/recipient-reporting>. DOE will also issue additional FAQs for recipients on its Energy Recovery website and has set up a hotline to answer any additional questions: 1-888-DOE-RCVY (1-888-363-7289).

2. What reporting items and metrics will States and/or sub-recipients be required to submit?

- For OMB required reporting into FederalReporting.gov, recipients will input 31 data elements. These elements comprise primarily organizational, financial and jobs related information, and do not include performance metrics, which will be covered in program specific reporting. Some key data elements include
 - Amount of award
 - Total amount of Recovery Act expenditure
 - Sub-awards:
 - Basic data elements for any sub-awards over \$25,000
 - Total number and amount of sub-awards

- Vendors
 - Basic data elements for any purchases over \$25,000
 - Total number and amount of payments to vendors <\$25,000
- Number and description of jobs created or retained (by both prime and sub-recipients)
- Primary place of performance
- Top five highly compensated officers

For a complete list of all data elements, please see:

<http://www.recovery.gov/?q=content/recipient-reporting>

3. Will DOE require new performance metrics based on energy savings, energy efficiency or other outcomes of the WAP?

Not at this time. DOE is in the process of conducting a new national evaluation of the WAP. In addition to the traditional metrics, this effort will expand to include emphasis on bill reductions. In the near future, DOE will focus more on non-energy benefits such as carbon reduction and health and safety impacts

4. Are States and/or sub-recipients required to conduct monthly monitoring?

The reporting requirements are currently being modified to require monthly reporting for Recovery Act funded activities and will be made available to the network upon completion.

5. How should States determine energy savings?

DOE is developing a simplified methodology that multiplies the number of weatherized homes by standardized state-by-state energy savings (supplied by DOE) which will provide quarterly savings information.

6. How are “jobs created” measured?

There are two broad categories of recipients: recipients of “financial assistance,” including grants, loans, cooperative agreements; and direct Federal contractors. Recipients of financial assistance are subject to the full OMB guidance on jobs reporting and will report jobs created or retained by both the grantee **and any sub-grantees**.

Direct Federal contractors are governed by the FAR (52.204-11) and are not required to report sub-contractor job creation.

Both recipients of financial assistance and contractors should report *direct* jobs created and retained using a standard calculation, translating both full- and part-time employees into “full-time equivalents,” or FTEs.

$$\frac{\text{Cumulative total hours worked by all employees in the quarter}}{\text{Cumulative total hours in a full-time schedule}}$$

Examples: A “half time employee” = 0.5 FTE. Equally, a full-time employee who is only 50% funded from Recovery Act funds = 0.5 FTE. An employee who works overtime (time and a half) = 1.5 FTE.

Recipients should be careful to *report only direct jobs*. That is, any job that is directly funded by the Recovery Act on the grantee or sub-grantee level. Indirect jobs—those that are not directly funded by Recovery Act funds or those that are created by a material supplier—are not reported into www.FederalReporting.gov.

7. How do we calculate job counts for contractors on pay-for-performance systems (Specifically lead generation contractors)?

- **Grants and Loans**

If the original source of the funding is financial assistance –grant, loan, or collective agreement—the prime recipient will estimate job creation for the sub-contractor. In this case, the recipient will need to convert the piece-rate or pay-for-performance system into an FTE equivalent to the best of their ability for reporting purposes. The recipient can use the industry-specific standard full-time schedule for the denominator in the FTE equation.

$$\frac{\text{Cumulative total hours worked by all employees in the quarter}}{\text{Cumulative total hours in a full-time schedule}}$$

For the purposes of an FTE calculation the “wage rate” is not relevant, so the recipient should calculate the jobs count based on estimated hours worked.

- **Contracts**

If the *original* source of Federal funding is a contract, the recipient will not report the sub-contractor job creation numbers.

8. Are administrative expenses reportable to Recovery.gov?

Administrative expenses are reported in the WAP consistent with the associated activities under the DOE grant. DOE will compile the costs and make any necessary reporting to Recovery.gov.

9. With regards to the reporting function, is it better to centralize reporting with States or allow sub-recipients to handle their own reporting to DOE?

For OMB reporting requirements, the prime recipients (e.g. States) have the option of delegating some reporting requirements to their sub-recipients or reporting themselves. DOE does not have a preference on this issue, but urges prime recipients to consider both the details of a data collection mechanism, the administrative burden and which method would elicit the most accurate data. In either case, the prime recipient is responsible for clearly communicating the information and reporting needs to its sub-recipients.

It is also important to note that recipients of grants, loans and cooperative agreements cannot delegate the jobs reporting requirement to sub-recipients. They must collect that information from the sub-awardees, and they are responsible for entering that data element as an aggregate number of jobs created/retained by both the recipient and the sub-recipient.

10. What's a reasonable frequency of field inspections for the WAP?

DOE is currently amending the monitoring and oversight requirements under the Recovery Act. Generally, 5% inspections of completed units is recommended, however, this figure is likely to increase under the Recovery Act.

11. Are States advised to supplement their field monitoring staff with outside evaluators who can measure impacts/benefits/cost effectiveness of grantees' energy programs?

For certain States, Recovery Act funding represents a 25-fold increase in funding. Ramping up the States' capability to adequately supplement additional staffing will be critical in providing the necessary oversight of the WAP with Recovery Act funds. Using outside evaluators could help mitigate this shortfall in staffing.

12. How can States best reconcile the historical metrics by which State agencies have gauged the progress of their programs with the added metrics (i.e. job creation/retention) from the Recovery Act?

DOE is currently amending the WinSAGA system to accommodate the new reporting requirements. Grantees will be notified when these updates have occurred, including how to report jobs created.

13. Does DOE require States to report any additional data not currently defined in the OMB or Recovery Act terms and conditions?

No. Not at this time.

B. Training

1. Will DOE provide guidance on required training curriculum?

Yes. DOE is developing a comprehensive training and technical assistance plan which will address curriculum as well as many other related issues. This plan is expected to be released soon.

C. Home Audits and Technical Support

1. In the event that a State and/or sub-recipient requires additional technical assistance for its weatherization program, what resources are available?

There is a myriad of technical assistance available within the weatherization network. You should contact your State Weatherization Program Manager to discuss what is available in your particular State. Likewise, you can check the www.waptac.org website to see what is available nationally as well as what other States are doing.

2. Are there any recommended methods and technologies States and/or sub-recipients should use?

There is a myriad of technical assistance available within the weatherization network. You should contact your State Weatherization Program Manager to discuss what is available in your particular State. Likewise, you can check the www.waptac.org website to see what is available nationally as well as what other States are doing.

3. What criteria determine which homes will be weatherized?

DOE suggests that local agencies and states determine eligibility based on poverty level, elderly in poverty, disabled, fuel costing. Local agencies should determine whether a particular unit is deemed to be a “good candidate home” for weatherization services. An assessment of whether the home needs any type of rehabilitation work or is free of major health and safety concerns can eliminate many units until they have been referred to the appropriate agency to have these major deficiencies corrected prior to weatherization.

4. Does DOE require States to use infrared technology in dwelling assessments?

No. DOE does not impose mandates on equipment. However, infrared cameras are an effective auditing tool that the grantees may choose to purchase for insulation purposes.

5. Are States encouraged to use new and innovative weatherization technologies or should they utilize more conventional measures?

No. DOE does not impose mandates on equipment.

6. Is guidance available for additional approved weatherization installation measures?

Weatherization measures will differ for each unit based on various factors including climate, existing materials, and cost. But the following measures are approved as long as the savings-to-investment ratio is 1.0 or higher:

Insulation

Air Sealing

Windows

Heating

Water Heaters

Air Conditioning and Warm Climate Weatherization Measures

Electrical Appliances and Weatherization Base Load Measures

Please refer to http://apps1.eere.energy.gov/weatherization/wx_technologies.cfm for more details

If innovative technologies are available and meet the cost effective test, then grantees can request that DOE review and approve the technology for use in the field. The new technology must be used in the field for DOE to consider it as an allowable measure.

If there are additional measures that are not specified by DOE that your agency would like to utilize, please contact your State weatherization program liaison to seek approval from DOE.

7. Must “designated agencies” be used to do the work for the WAP? Can agencies beyond those listed in an application be used?

You cannot use agencies beyond the one you listed in your application per 440.14. DOE encourages the use of new and innovative technologies that are designed to improve program performance.

8. Must legal status be confirmed for all weatherization assistance recipients, specifically those residing in multi-unit dwellings?

The U.S. Department of Health and Human Services (HHS) issued Information Memorandum LIHEAP-IM-98-25 dated August 6, 1998, outlining procedures for LIHEAP and WAP grantees serving non-qualified aliens to implement new status verification requirements. This memorandum is based on a proposed rule issued by the Department of Justice (DOJ) on August 4, 1998. The Welfare Reform Act is a complex issue and there is some confusion on the specific application of this part of the Act. To insure WAP continuity between LIHEAP and Weatherization for the many sub-grantees operating both programs, the WAP will follow the interpretation as adopted by HHS.

The primary area of confusion resides in the types of local agencies that are exempt/nonexempt from “status verification requirements.” Local agencies that are both charitable and non-profit, which comprise about three-quarters of the local agency network, would be exempt.

However, those agencies which are designated as local government agencies operating the WAP would not be exempt and, therefore, must conduct “status verification.” Under the DOJ ruling, Grantees subject to this ruling have two years to fully implement this procedure after the publication date of the final rule. As of this date, the final rule has not been issued.

9. Is blower door testing required for multi-unit dwellings?

No. It is not required, but it may be recommended. Some multi-unit dwellings, generally units that are 1-4 floors or garden style, function as a single family unit. Therefore they would benefit from a blower door air leakage test. For larger multi-family buildings, following a multi-family focused audit procedure would be best such as EQ-UIP.

10. If a blower door diagnostic of a home passes initial inspection, but the home is in obvious need of weatherization services (via duct blaster or infrared inspection), are contractors still authorized to perform work?

If a client qualifies for WAP funds and does not need air sealing or insulation but needs additional measures, then that unit should be completed with the appropriate measures. The cost of the completion would then be lower.

11. Do blower door tests have to be performed twice per house, once when the improvements are being made and once by the quality assurance team?

A diagnostic energy audit is required on all DOE units; this audit includes blower door testing. The post inspection/quality control is the same as the diagnostic audit; it just ensures that the installations were completed effectively. It is also a best practice and DOE recommendation that blower door tests are completed as the measures are being installed, especially when air sealing.

D. Federal Funding; State and Local Spending

1. How quickly can the network ramp up?

The coming year will see grantee and local agencies hiring and training workforce and buying vehicles and equipment. It is estimated that the network could reach the capacity to weatherize a substantial number of homes per year within 12 months.

2. Is there a way to speed up the State procurement process?

This is an individual State issue.

3. Are the States advised to use FY 2009 monies to ramp up for WAP work?

As long as the States stay within the appropriate cost categories, such as administrative funds not exceeding capped categories, it is allowable.

4. When will the remaining 50% of funds be distributed?

DOE will provide guidance shortly to States on what documentation is required to receive the remaining 50% of the total funding.

5. Is the \$6,500 reimbursement per-unit based on the average of all work performed or on a unit-by-unit basis?

State agencies may utilize an average of \$6,500 per unit.

6. Can DOE Recovery Act funds be used to upgrade weatherization reporting systems?

Yes, all funds utilized for program ramp up purposes including, but not limited to, IT infrastructure, marketing/program outreach, staff resources and diagnostic equipment may be classified as "administrative."

7. What percentage of weatherization funding is allowable for health and safety purposes?

The WAP is not a home repair program, and health and safety costs must be energy related. There is not set percentage for health and safety, but the cost must be justified as appropriate.

8. What are the deadlines for spending of Recovery Act funds?

DOE has indicated in the Grant Guidance documents that Recovery Act funds are to be spent over a three-year period.

9. Can marketing costs that benefit all Weatherization programs (e.g. DOE, LIHEAP, utilities) be funded through Recovery Act funding or should costs be evenly split and charged to each program account?

Costs should be charged appropriately to each program.

10. How should marketing costs be accounted for—as training and technical assistance (T&TA) or as administrative?

Generally, these costs are charged as training and technical assistance.

11. Are States authorized to purchase vehicles above the \$5,000 equipment threshold?

DOE must approve all equipment and vehicle purchase above \$5,000 prior to purchase. Once grantees receive DOE approval, they can purchase the vehicles.

12. Some community action groups are in areas where leasing vehicles is extremely difficult and expensive. Can they purchase vehicles with Recovery Act funds?

DOE rules allow for vehicle purchases, though it may be a State requirement to lease.

13. Does DOE prefer leasing or purchase of vehicles for Recovery Act programs?

All decisions on vehicle or equipment purchases should be discussed with the respective Project Management Center to help decide the best option.

14. If States and/or sub-recipients have program funding from additional sources (LIHEAP, Non-Recovery Act DOE, Public Utilities, etc.), should those funding sources be exhausted prior to utilizing Recovery Act funds, or may they be used concurrently?

Funds can be used in conjunction with each other. However, only one source of DOE funds can go into a unit. Accounting for different funding allocation expenditures should be delineated separately and clearly.

15. Are amounts paid to a contractor to perform oversight and monitoring administrative costs?

On the grantee level, monitoring can either be charged to administrative costs or to T&TA. On the sub-grantee level, monitoring/quality control can either be charged to administrative costs or program operations.

16. Can pre-award cost be requested back to February when the Recovery Act was signed into law?

Grantees should contact their respective Project Management Center for specific guidance on this issue.

17. Can States/sub-grantees make bulk purchases of equipment (e.g. high efficiency boilers, blower doors, or windows) for WAP and if so, what's the savings-to-investment potential?

Bulk purchasing is allowable. As a caution, the purchaser will want to ensure that the materials will be used. Bulk purchasing does not eliminate the need to audit. If a computerized audit is being used then the unit cost categories would be adjusted in the library to reflect the reduced price per unit due to the bulk purchase.

E. Best Practices

1. In the event that I have additional Recovery Act related questions, what other resources are available?

Contact your DOE project manager or www.waptac.org

2. Where can we go to learn about best practices from other States?

Contact your DOE project manager or www.waptac.org

3. How do you suggest we do the ramp up for hiring people? Are there any best practices for hiring?

Contact your DOE project manager or www.waptac.org

4. How can States best expand energy audit capacity?

Contact your DOE project manager or www.waptac.org

F. Historical Preservation

1. What implications does Section 106 of the National Historic Preservation Act have on the States for Recovery Act-related programs?

Section 106 of the National Historic Preservation Act requires entities using federal funds in historic properties or potentially historic properties to submit appropriate documentation to the State Historic Preservation Office (SHPO) prior to completion of work to ensure that there is no adverse affect on the property. A historic property is identified as on or eligible for the National Register of Historic Places. There are levels of significance required for eligible properties, but the minimum requirement is an age of 50 years or older. There is a provision in the Act that the property owner does have the first right of refusal.