

# **Weatherization Assistance Program**

July 1, 2025– June 30, 2026

---

## **Draft State Plan**



**WEST  
VIRGINIA**  
Economic Development

## West Virginia Department of Economic Development

### U.S. Department of Energy - Weatherization Assistance Program

Program Year: 2025- 2026

State Plan Annual File

## IV. Annual File

### IV.1 SUBGRANTEES

Subgrantee (City)	Planned Funds	Units
CHANGE, Incorporated (Weirton)	\$199,688	16
Coalfield Community Action Partnership, Inc. (Williamson)	\$497,341	41
Community Action of South Eastern WV, Inc. (Bluefield)	\$331,504	27
Community Resources, Inc. (Parkersburg)	\$440,317	36
Eastern WV Community Action Agency (Moorefield)	\$509,114	42
MountainHeart Community Services, Inc. (Oceana)	\$160,637	13
Nicholas Community Action Partnership (Summersville)	\$96,124	8
North Central WV Community Action Association, Inc. (Fairmont)	\$633,551	52
PRIDE Community Services, Inc. (Logan)	\$310,372	26
Southwestern Community Action Council, Inc. (Huntington)	\$425,218	35

#### Selection of Subgrantees:

Per 42 U.S.C. § 6864(b)(4) and 10 CHR 440.15, the West Virginia Weatherization Assistance Program (WV WAP) conducts a public hearing during the State Plan process. The public, Community Action Agencies, or other public or nonprofit entities can attend and state their interest in becoming a WV WAP provider. WVDED subrecipients are selected on the basis of public comment which is received during the public hearing. Also considered is the potential applicants' and/or current subrecipient's experience in assisting low-income persons, not only through weatherization, but through all low-income assistance programs offered throughout their service areas. WV WAP applicants/subrecipients must also demonstrate the capacity to operate a timely and effective weatherization program. Preference is given to Community Action

Agencies that are currently administering an effective weatherization program under Title II of the Economic Opportunity Act of 1964. WV WAP has chosen its subrecipients from qualifying Community Action Agencies throughout the state. WV WAP considers the subrecipient's experience and performance in weatherization or housing renovation activities.

## IV.2 WAP PRODUCTION SCHEDULE:

Average Unit Costs, including Re-weatherization – Subject to DOE Program Rules	
VEHICLE & EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)	
A. Total Vehicles & Equipment (\$5,000 or more) Budget	\$0
B. Total Units Weatherized	297
C. Total Units Reweatherized	0
D. Total Dwelling Units to be Weatherized and Reweatherized (B+C)	297
E. Average Vehicles & Equipment Acquisition Cost per Unit (A divided by D)	\$0
AVERAGE COST PER DWELLING UNIT (DOE RULES)	
F. Total Funds for Program Operations	\$2,521,018
G. Total Dwelling Units to be Weatherized and Reweatherized (from line D)	297
H. Average Program Operations Costs per Unit (F divided by G)	\$8,488
I. Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$0
J. Total Average Cost per Dwelling (H plus I)	\$8,488

Reweatherized Units: 0

## IV.3 ENERGY SAVINGS

The West Virginia Weatherization Assistance Program (WV WAP) will utilize the WAP algorithm to calculate projected energy savings for the purpose of this application. The estimated energy savings for PY 2025 - 2026 is 10,958 MBtu.

Energy Savings		
DOE Program	Amount	Line
Total DOE State Weatherization Allocation	\$4,052,080	(a)
Total Cost associated with Administration, T&TA, Financial Audits, and Insurance <b>AND H&amp;S (Separate Line)</b>	\$1,728,979	(b)
Subtract the amount entered in line (b) from line (a), for a total Federal (DOE) funds available to weatherize homes	\$2,323,104	(c)
State Average Cost per Home (based on WV's PY23 ACPU)	\$7,676	(d)
Divide the amount entered on line (c) by the amount entered on line (d), for Total Estimated Homes to be Weatherized	302	(e)
Multiply (e) by 29.3 MBTU for Total Annual Estimated Energy Savings resulting from DOE appropriated funds	\$8,848.60	(f)

## IV.4 DOE-Funded Leveraging Activities:

WV WAP will continue to pursue non-Federal resources to supplement the Program through the development or continuation of leveraging projects and partnerships. WVDED will have a staff member that will continue to participate in leveraging activities. For PY 2025 - 2026, WVDED plans to utilize **0 percent (\$0)** of the annual formula DOE allocation for leveraging activities.

Planned activities may include the following objectives as needed to increase the scope of weatherization services to low-income West Virginia households:

- Increased facilitation in the development of utility/WAP projects and partnerships, including supporting representation activities in the West Virginia Public Service Commission if needed for new partnerships. WVDED staff will continue to be involved in technical assistance, planning, and rules development of any negotiated projects or partnerships. Expansion or altering of certain weatherization-utility partnership activity may be negotiated between the utility companies and the local weatherization providers, with WVDED made fully aware of any changes made in this manner, providing input as needed.
- Continued facilitation of the expansion of potential subrecipient leveraging activities by:
  - Assisting subrecipients and West Virginia Community Action Partnership (WVCAP) through the negotiation of partnerships, agreements, and other arrangements;
  - Presentation of arguments and associated activities before state or local agencies, as contained under Section 142 of the Energy Policy Act of 1992 (amended in 2005) and providing training and technical assistance support to WVCAP and subrecipients as part of their active participation in utility rate proceedings and process in West Virginia as applicable; and
  - Continued contact with both the utility industry and the private energy service company network to continuously improve programs.
- Continue to provide support and leadership to subrecipients and WVCAP offering tools and resources to assist in weatherization outreach, possibly including fall Energy Awareness activities. Such potential activities may involve:
  - Support in holding leveraging-related meetings;
  - Preparation of statewide weatherization statistical documents;
  - Preparation of public information/energy efficiency data; and
  - Technical assistance in the organization of weatherization site demonstrations at the local subrecipient level to illustrate program technology for policymakers and other partners.

It is anticipated that continued leveraging activities will enable the WV WAP to enhance and expand comprehensive low-income weatherization services and be viewed as a leader in energy conservation technology and a viable partner in conservation projects. Listed below are the identified funding sources outside of DOE funding for the WV WAP at this time. However, it is a goal of the WV WAP to continue to pursue funding to support and build upon the weatherization program in the State of West Virginia. This pursuit may include but not be limited to grants, foundation funds, and other non-federal partnerships.

## **Current non-DOE Funding Supporting WV WAP**

- 1. Low-Income Home Energy Assistance Program (LIHEAP):** The WV WAP will continue to utilize Low-Income Home Energy Assistance Program (LIHEAP) funds in the operation of the weatherization program. WVDED has worked with the West Virginia Department of Health and Human Resources (DHHR), the LIHEAP Grantee, to identify allowable measures and costs that could be supported by LIHEAP funding outside of DOE regulations and requirements. As per LIHEAP IM 1999-11, Weatherization Grantees “may use some, all or none of the statutory and regulatory provisions that apply to the Department of Energy’s Low-Income Weatherization Assistance Program when spending LIHEAP funds on weatherization activities, provided the grantee administers both programs.” Therefore, WVDED works with DHHR to construct the LIHEAP agreement to provide more flexibility within the program and the ability to address issues that may not be able to be addressed with DOE funding due to certain restrictions.

Currently, the most notable exceptions of LIHEAP funding are the three (3) Supplemental Components: Electrical Upgrade, Weatherization Related Home Repair, and the Energy Crisis Intervention Program (ECIP) which historically have been approved measures of the Grant Agreement WVDED has with DHHR. DHHR has also approved additional funds for Health and Safety measures through LIHEAP funding. The WVDED monitors subrecipient Health and Safety spending monthly to keep the WV WAP Network from spending excessive funding on Health and Safety related issues.

The WV WAP is again seeking additional LIHEAP funding through DHHR for weatherization services. The WV WAP is proposing that these funds not include all DOE rules and regulations in order to address client issues that are outside the scope of DOE funds. This includes additional Home Repair flexibility in attempts to reduce the deferral rate of the WV WAP by being able to address larger scale repair issues of dwellings to make them eligible to receive weatherization services. Working with DHHR, the WVDED will continue to be diligent to include proper standards for these funds to ensure appropriate quality for measuring installation.

## **2. Utility Programs**

Through participation in rate-case energy advocacy intervention activity at the Public Service Commission of West Virginia, the WVCAP worked and advocated for utility-weatherization leveraging partnership initiatives administered by WVDED. These have been continuing partnerships that have not required additional rate case intervention. The current partnerships are as follows:

- **Dominion Hope Gas:**
  - The Dominion Hope Targeted Gas Energy Efficiency Program (TGEEP) is also managed in conjunction with the WAP. The intent of the program is to improve the overall efficiency and safety of the heating system by repair or replacement, thereby reducing the energy consumption of the customers served. Currently no other measures are approved as part of the program.
- **AEP dba Appalachian Power Company and Wheeling Power Company (APCO):**
  - The APCO low income weatherization program is a comprehensive utility funded residential energy efficiency program that encompasses all the

major areas of the DOE WAP (insulation, air sealing, HVAC, baseload reduction, and limited health and safety measures). The program funding for PY 2025-2027 is \$6,000,000.00. This program, as well as the other non-WAP energy efficiency programs Appalachian Power Co. operates in WV, is evaluated yearly by a third-party contracted by the utility company.

- **FirstEnergy Corporation dba Mon Power Company and Potomac Edison Company:**

- The FirstEnergy family of companies is headquartered in Akron, Ohio, and in West Virginia utilizes Potomac Edison Company for the service area in the eastern panhandle, and the Mon Power Company in the north-central service area of the state.

- **FirstEnergy EEP:** FirstEnergy Electric Efficiency Partnership: The program focuses on measures that will impact the consumption of electricity in the homes of WAP clients that are electric customers of FirstEnergy Corporation in West Virginia. The program reimburses for costs of electric heating systems up to \$500, 50% of costs of electric water heaters, 50% of air sealing and insulation costs, and 100% of cost of various baseload measures.
- **TrAILCo EEP+:** The Trans-Allegheny Interstate Line Company (TrAILCo) Electric Efficiency Partnership provide funds to the two West Virginia WAP Community Action Agency (CAA) subrecipients serving FirstEnergy customers in the six-county area through which the TRAILCo corridor passes. The program operates to supplement the DOE WAP funds to provide customers a more comprehensive and aggressive focus on baseload energy usage and energy efficiency measures than is defined and permitted by the DOE WAP. The TrAILCo program further invests in long range lowering of utility costs by allowing the installation of Energy Star appliances such as washing machines, air conditioners, water heaters and other appliances that have the potential to reduce energy costs for the household. The program also allows the replacement of high cost, low-efficiency heating systems with high-efficiency systems including Energy Star heat pumps. The TrAILCo program also allows for the installation of standard weatherization measures to better serve a greater number of clients more effectively and efficiently and stretch the federal weatherization dollars further.

## IV.5 Policy Advisory Council:

The Policy Advisory Council (PAC) historically meets at least once a year with periodic updates sent to members if major changes occur. A PAC meeting is scheduled during the WV WAP State Plan process to solicit input from the PAC Committee on the development of the program for PY2025 - 2026.



### Policy Advisory Council Members:

<b>NAME</b>	<b>ORGANIZATION</b>	<b>CONTACT INFORMATION</b>	<b>REPRESENTING</b>
Steve Gilman	PRIDE Community Services Inc.	<a href="mailto:steve.gilman@loganpride.com">steve.gilman@loganpride.com</a>	WV WAP Network
Vacant	WV Statewide Independent Living Council		West Virginians with Disabilities
Gaylene Miller	Senior State Director, AARP	<a href="mailto:gmiller@aarp.org">gmiller@aarp.org</a>	Elderly
Mary Chipps	Executive Director, WV Community Action Partnership	<a href="mailto:mchipps@suddenlinkmail.com">mchipps@suddenlinkmail.com</a>	Community Action Agencies
Robert Williams	Public Service Commission; Consumer Advocate Division	<a href="mailto:rwilliams@cad.state.wv.us">rwilliams@cad.state.wv.us</a>	Consumers in West Virginia
Tammy Stafford	EE & Consumer Programs Manager, Appalachian Power	<a href="mailto:TCSTAFFORD@AEP.COM">TCSTAFFORD@AEP.COM</a>	Utility Sector

The WV WAP PAC has excellent representation in areas relevant to eligible applicants, energy efficiency/leveraging activities, and subgrantee execution of weatherization services. WVDED and the PAC are always open and considering if the addition of further representatives would be beneficial to the PAC. The PAC works to advise state weatherization staff on issues, challenges, and future direction of the program. The council is composed of members of associations and organizations serving the citizens of West Virginia. PAC members, by their leadership roles in the larger community, bring added value from an outside perspective to the program. The committee can also be an advocate for the general public about the Weatherization Assistance Program, low-income energy needs, and energy efficiency. The PAC will advise WV WAP staff on policy based on their knowledge, perspective, and sensitivity to their particular constituency.

## IV.6 State Plan Hearings:

An announcement of the Virtual Public Hearing will be posted for three (3) consecutive days, at least ten (10) days prior to the Public Hearing on the CAD Sustainability website link below: <https://wvcad.org/sustainability/weatherization-assistance-program>.

The Virtual Public Hearing will be held on Friday, April 30, 2025 at 10:00 AM. The Public Hearing Notice and PY 2025 Draft of the State Plan was made available on the West Virginia Community & Development (WVCAD) website for public review. A court reporter was retained to provide a transcript of the Virtual Public Hearing and WVDED will provide the written transcript upon receipt.

## IV.7 Miscellaneous:

### **“Recipient Business Officer”**

*Name:* Jennifer Ferrell – Director, WV Community Advancement and Development

*Email:* [Jennifer.L.Ferrell@wv.gov](mailto:Jennifer.L.Ferrell@wv.gov)

*Phone:* 304 – 558 – 2234

### **“Recipient Principal Investigator”**

*Name:* Ben Shannon – Weatherization Program Manager

*Email:* [Benjamin.T.Shannon@wv.gov](mailto:Benjamin.T.Shannon@wv.gov)

*Phone:* 304 - 352 - 3967

## V. MASTER FILE

### V.1. Eligibility

Dwellings in all fifty-five (55) counties of West Virginia are eligible for weatherization services and are intended to be served by the WV WAP. Any West Virginia resident who meets client eligibility requirements and whose dwelling meets building eligibility requirements would be eligible to receive weatherization services. WV WAP maintains a waitlist for applicants that have met the eligibility requirements. As per DOE requirements and 10 CFR 440.16(b), households on the waitlist are prioritized in accordance with the procedures outlined in section V.3 of this plan.

Every dwelling weatherized in the State of West Virginia must meet both the client eligibility **and the** building eligibility requirements as detailed below:

#### **V.1.1 Approach to Determining Client Eligibility**

- a) The WV WAP will determine eligibility of an applicant based on receipt of a complete application and if the household income meets the criteria established in this plan. Subrecipients must use 200% of the federal poverty guidelines and definition of poverty as stated in DOE WPN 24-3 Poverty Income Guidelines and Definition of Income, dated January 17, 2024, and published in the Federal Register January 19, 2023, as updated by the U.S. Department of Health and Human Services under the authority of 42 U.S.C. 9902(2), effective January 17, 2024.
- b) Definition of Income for the Purpose of Determining Eligibility: Income means Cash Receipts earned and/or received by the applicant before taxes during applicable tax year(s) but not the Income Exclusions listed below. Gross Income is to be used, not Net Income.
- c) **CASH RECEIPTS:**
  - i) Cash Receipts include the following:
    - (1) Money, wages and salaries before any deductions;
    - (2) Net receipts from nonfarm or farm self employment (receipts from a person's own business or from an owned or rented farm after deductions for business or farm expenses);



- (3) Regular payments from social security, railroad retirement, unemployment compensation, strike benefits from union funds, worker's compensation, veteran's payments, training stipends, alimony, and military family allotments;
- (4) Private pensions, government employee pensions (including military retirement pay), and regular insurance or annuity payments;
- (5) Dividends and/or interest;
- (6) Net rental income and net royalties;
- (7) Periodic receipts from estates or trusts; and
- (8) Net gambling or lottery winnings.

**d) INCOME EXCLUSIONS:**

- i) The following Cash Receipts are not considered sources of Income for the purposes of determining applicant eligibility:
  - (1) Capital gains;
  - (2) Any assets drawn down as withdrawals from a bank;
  - (3) Money received from the sale of a property, house, or car;
  - (4) Onetime payments from a welfare agency to a family or person who is in temporary financial difficulty;
  - (5) Tax refunds;
  - (6) Gifts, loans, or lump sum inheritances;
  - (7) College scholarships;
  - (8) One time insurance payments, or compensation for injury;
  - (9) Noncash benefits, such as the employer paid or union paid portion of health insurance;
  - (10) Employee fringe benefits, food or housing received in lieu of wages;
  - (11) The value of food and fuel produced and consumed on farms;
  - (12) The imputed value of rent from owner occupied nonfarm or farm housing;
  - (13) Depreciation for farm or business assets;
  - (14) Federal non cash benefit programs such as Medicare, Medicaid, Food Stamps, school lunches, and housing assistance;
  - (15) Combat zone pay to the military;
  - (16) Child support;
  - (17) Reverse mortgages; and
  - (18) Payments for care of Foster Children.

**e) Income Verification Procedures:**

- i) Proof of income eligibility must be clearly identified in the client file which is maintained in the WV WAP data management system. All eligibility documentation is to be reviewed and verified in the WV WAP data management system by the subrecipient prior to approving and moving an applicant to the WV WAP weatherization waitlist.
- ii) **Availability of Supporting Documentation:**
  - (1) For review and audit, each client file must include a completed application with required demographics and household income,

excluding earnings or unemployment compensation for minors under 18 or full-time high school students. The file must also contain proof of WAP eligibility, such as third-party certification or source documentation for listed income. All documents must be stored electronically in the WV WAP data management system.

iii) **Self-Certification:**

- (1) Only allowed after all other income documentation attempts fail. The client file must include evidence of these attempts and a notarized Zero Income Affidavit stating the applicant has no proof of income.

iv) **Annualization of Income:**

- (1) The WV WAP data system calculates annualized income for eligibility using at least one month of recent income. Less than 12 months of data may be used. Families receiving cash assistance under Title IV or XVI of the Social Security Act or applicable state/local law in the past 12 months qualify for weatherization per 10 CFR Part 440.22.

v) **Recertification of Eligibility:**

- (1) If over a year passes between application and weatherization service, client income must be reverified per WV WAP and DOE rules. WVDED reviews eligibility during monitoring and updates Poverty Income Guidelines annually per DOE revisions.

**f) Client Application Procedures:**

- i) WV WAP applicants must apply online via the LITT Customer Portal or contact their local WAP provider to apply in person or by mail. WV WAP partners with the WV Community Action Partnership, using the same software as WV's Community Services Block Grant entities for seamless communication and case management. Applicants must complete all mandatory data fields, including household demographics and residence details, and certify the validity of their information. False applications result in ineligibility. The WV WAP Program Guide ensures consistency in data management and client processing across the WAP Network.

**g) Qualified Aliens Eligibility for Benefits:**

- i) An eligible household member is any individual who is a U.S. citizen or "qualified alien" and is a member of a household that meets the eligibility requirements specified above. A "qualified alien" is defined at 8 U.S.C. § 1641(b). For more information and guidance on ensuring DOE weatherization services shall only be provided to eligible populations, subrecipients are directed to review the [LIHEAP IM HHS Guidance on the Use of Social Security Numbers \(SSNs\) and Citizenship Status Verification](#).

**h) Household Eligibility:**

- i) WVDED requires all subrecipients ensure client eligibility during which services are delivered. All prospective applicants will be required to identify and provide documentation of the amount and source of all income for the household and client ownership.

As defined in 10 CFR 440.3, low income means that income in relation to family size which:

- (1) Eligibility is set at or below 200% of the poverty level per the Director of the Office of Management and Budget (OMB) criteria. A higher threshold may be established if deemed necessary by the Secretary, in consultation with the Secretary of the United States Department of Agriculture (USDA) and the Secretary of Health and Human Services (HHS), to align with Weatherization Program requirements under Section 222(a)(12) of the Economic Opportunity Act of 1964.
  - (2) Is the basis on which cash assistance payments have been paid during the preceding twelvemonth period under Titles IV and XVI of the Social Security Act or applicable State or local law; or
  - (3) If a Grantee elects, it is the basis for eligibility for assistance under the Low Income Home Energy Assistance Act of 1981, provided that such basis is at least 200 percent (200%) of the poverty level determined in accordance with criteria established by the Director of the OMB. WVDED will utilize this option for PY 2025.
- ii) Availability of Supporting Documentation:
- (1) Each Client File must include the client's application with required demographics and household income. It must also contain proof of WAP eligibility, such as a third-party income certification or source documentation for listed income.
- iii) Self-Certification:
- (1) Self-certification is allowed only after all other income verification methods are exhausted. The Client File must include proof of these attempts and a notarized Zero Income Affidavit signed by the applicant.

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

**i) Procedures to determine that units weatherized have eligibility documentation:**

- i) As stated above in V.1.1, the WV WAP will determine client eligibility based on receipt of a complete application and if the household income meets the criteria established in this plan. In addition to determining client eligibility, applicants must also demonstrate that the dwelling structure is eligible for weatherization.

Building/structure/home eligibility is based on:

- (1) Documentation of ownership
  - (2) Additional income documentation for renters
  - (3) Proof that the building has not been weatherized in the last 15 years
  - (4) Other factors described in this section.
- ii) An eligible household member is a U.S. citizen or "qualified alien" per 8 U.S.C. § 1641(b) in a household meeting eligibility requirements. The application process ensures DOE weatherization services are provided only to eligible populations and follows the same income eligibility criteria as West Virginia's LIHEAP Weatherization program.

**j) Documentation of Ownership:**

- i) Documentation is required to prove home ownership. These documents must be stored in the client file in the WV WAP data management system.
- ii) Examples to meet this requirement include, but are not limited to:
  - (1) Deeds/titles
  - (2) Property tax record with street address
  - (3) Municipal websites
  - (4) Mortgage documents
  - (5) Insurance documents

**k) Eligible Structures:**

- i) Subrecipients must provide weatherization services to low-income residents in standard housing types, including single-family homes, modular homes, duplexes, small rental units, and multifamily buildings. Caution is advised for nontraditional dwellings like shelters and apartments over businesses, with WVDED consulting WV DOE as needed. Weatherization is not allowed for nonstationary campers or trailers without a mailing address. For structures requiring service deferral, see the Deferral Process section.

**(1) Tiny Homes/Auxiliary Dwelling Units:**

- (a) WV WAP may weatherize Tiny Homes and ADUs. Units under 550 sq. ft. require WVDED approval. The dwelling must have at least 220 sq. ft. of conditioned space, plus 100 sq. ft. per occupant beyond two. Minimum square footage is determined per ANSI Standard Z765-2003. In addition to ANSI Z765-2003:

- (i) Living space (finished areas/rooms) must have a conditioned floor area minimum of 70 square feet (6.5 m<sup>2</sup>). Exception: Kitchens
- (ii) The dwelling must have a separate bathroom containing a fully functioning sink, toilet, and a bathtub or shower.
- (iii) If the unit/dwelling's floor, frame, or foundation is prefabricated, a Manufactured Home Energy Audit (MHEA) must be used.
- (iv) If the unit/dwelling is on slab, block, or is free of any typical manufactured housing supports a National Energy Audit Tool (NEAT) must be used.
- (v) If the unit/dwelling has affixed wheels, axels, or is made to be towable, the unit is considered a Recreational Vehicle (RV) and cannot be weatherized.

**ii) Historic Preservation:**

- (1) On May 14, 2020, DOE, WVDED, and WVSHPO entered a Programmatic Agreement (PA) to meet Section 106 requirements of the National Historic Preservation Act for DOE projects in WV. Following DOE Weatherization Program Notice 1012, WV WAP evaluates Section 106 reviews per the PA, amended on November 20, 2020, and extended to December 31, 2030. WVSHPO approves measures exempt from NHPA review. WVDED will maintain at least

one staff member trained in Historic Preservation reviews, approvals, and guidance, with required completion of Section 106 Essentials.

iii) **Rental Units:**

- (1) The WV WAP may provide weatherization to rental units, including multiple dwelling units (MDUs). The WV WAP has procedures that address the protection of renters' rights as per 10 CFR 440.22(b)(3) and 440.22(c)(e). No rented dwelling unit can be weatherized without first obtaining the written permission of the owner (or his/her agent) of the dwelling unit. Completion of the "Weatherization Rental Release and Agreement" form is mandatory for rental units.
- (2) The "Weatherization Rental Release and Agreement" form is designed to assure the following:
  - (a) That the benefits of weatherization assistance shall reside primarily with the low income tenants;
  - (b) That no undue or excessive enhancement shall occur to the value of the dwelling unit;
  - (c) That no landlord contributions are required for single family housing;
  - (d) That if an owner of the dwelling unit qualifies for WV WAP, no landlord contribution is expected; and
- (3) For multifamily buildings, landlords outside WV WAP poverty guidelines must understand the Weatherization Landlord Owner Investment form, requiring a 25% contribution to weatherization costs. If negotiations fail and the landlord refuses to contribute, weatherization may proceed with proper documentation and WVDED approval.
- (4) For *two* (2) years from signing the Weatherization Rental Release and Agreement form, rent cannot increase due to weatherization improvements. If a tenant believes a rent increase is solely due to these services, the following steps must be followed:
  - (a) WVDED will instruct the tenant to file a written complaint with WVDED detailing the situation and the perceived reason for the rent increase.
  - (b) WVDED will work with the subrecipient and make contact with the landlord and notify that a complaint has been filed and provide the landlord with a copy of the complaint. The landlord will have the opportunity then to appeal the complaint.
  - (c) WVDED will obtain all pertinent information applicable to the dwelling and the weatherization services received and will review all of the information provided, seeking guidance from DOE and/or legal counsel as needed.
  - (d) WVDED will work to resolve the situation in a way agreeable to all parties. WVDED encourages the use of alternative dispute resolution procedures including arbitration.

iv) **Income Documentation for Renters**

- (1) Multifamily units follow the same client prioritization as single-family weatherization unless WVDED decides otherwise. Buildings with five or more units qualify if 66% of occupants meet eligibility (50% for duplexes and quadruplexes) per 10 CFR 440.22. Services follow DOE WPN 22-12 and WPN 22-13. The *West Virginia Multifamily Owner Agreement*, adapted for multifamily units, aligns with DOE WPN 22-12.
- (2) Pursuant to 10 CFR Part 440.22(b)(1), a subrecipient may weatherize a building containing rental dwelling units for an applicant who meets the client eligibility requirements under this plan at V.1.1.1, where:
  - (a) The subrecipient has obtained written permission from the property owner or agent before any work is done on a building containing rental units
  - (b) Not less than sixty six percent (66%), (fifty percent (50%) for duplexes and quadruplexes), of the occupants in the building:
    - (i) Are eligible dwelling units.
    - (ii) Will become eligible dwelling units within 180 days under a Federal, State, or local government program for rehabilitating the building or making similar improvements to the building.

**v) Deferral Process**

- (1) The WV WAP has a Deferral Policy to standardize the process of postponing weatherization assistance when necessary. A deferral does not mean assistance is permanently denied but delayed until home issues are resolved. Subrecipient crews and contractors must explore all reasonable options within program guidelines. If an onsite visit confirms one (1) or more deferral conditions, the subrecipient must send a letter to the client detailing the reasons. The deferral reason must be documented in the database, which automatically generates the justification letter for the client.
- (2) Possible deferral conditions include but are not limited to:
  - (a) Structurally unsound dwelling that is not suitable and adaptable to weatherization services, and the WAP does not have the resources to do necessary repairs;
  - (b) Electrical or plumbing hazards that cannot be resolved prior to or as part of weatherization services.
  - (c) The presence of raw sewage around or in any part of the dwelling;
  - (d) The presence of a dead animal, or animal feces, in an area where program staff must install weatherization measures;
  - (e) Excessive debris and clutter in and around the dwelling that limits access to the dwelling and areas within the dwelling:
    - (i) Clutter Image Rating: Living Room – Dwelling deferred with rating of = 4
    - (ii) Clutter Image Rating: Bedroom – Dwelling deferred with rating of = 4



- (iii) Clutter Image Rating: Kitchen – Dwelling deferred with rating of = 4
  - (f) Pets unchained or running on the loose that would be distracting or unsafe to program staff;
  - (g) The client is uncooperative, abusive, or threatening to the crew, or there is an apparent threat of violence or abuse to any program worker, or any household member during the weatherization process;
  - (h) The presence or use of any controlled substance in the dwelling during the weatherization process.
  - (i) Environmental hazards, such as serious moisture problems, known excessive radon, friable asbestos, excessive lead paint, or other environmental hazards that cannot be resolved prior to or as part of the weatherization services.
  - (j) Evidence of substantial infestation of rodents, insects, bats, or other harmful/objectionable animals that are difficult to control;
  - (k) Major remodeling is in progress, limiting the proper installation of weatherization measures;
  - (l) Substantial standing water in or around the crawl space or basement area limiting the proper completion of weatherization measures;
  - (m) Dwelling resident has a medical condition that prohibits the installation of insulation and/or other weatherization measures;
  - (n) No cost effective or appropriate health and safety measures can be done to the house resulting in minimal energy savings;
  - (o) Customer in arrears with utility vendor, gas service has been shut off, or electric service has been shut off;
  - (p) Client refusal of primary energy conservation measure (SIR = 1);
  - (q) Client refusal of health and safety measure(s) necessary for client safety;
  - (r) Client cannot be reached by available means of communication within 90 days;
  - (s) Income verification needed;
  - (t) Updated utility information needed; and
  - (u) Other conditions not listed above that prohibit complete weatherization.
- (3) The WV WAP Deferral Policy outlines steps for subrecipients and clients to address deferrals and potentially complete weatherization. Clients must resolve identified issues and provide documentation to the subrecipient. If issues remain unaddressed or the client does not respond, a separate procedure applies. Once deferral reasons are resolved, the application is reactivated, though eligibility criteria may need renewal based on timing. The policy specifies timing parameters, and all steps and documentation must be maintained.

Deferral reasons are tracked and reviewed, with results shared in monthly and quarterly meetings. Agencies may deny services if crew safety is at risk, but clients can appeal in writing to the subrecipient, providing additional information if needed.

(a) **NOTE:** While the client is notified that they can appeal to the subrecipient, WVDED intends to make updates to the appeal process in PY25 that requires any appeals by an applicant to be sent to the state for review.

(b) In Program Year 2025, the WVDED will continue to provide referral information on the U.S. Department of Agriculture (USDA) 504 Loan and Grant Programs to client inquiries at WV WAP where details provided by the client fall outside the scope of DOE weatherization, e.g., new roofs, windows, home repair beyond the LIHEAP DHHR Home Repair component, etc.

vi) **Re-weatherization:**

(1) Dwelling units weatherized under this or other Federal programs cannot receive additional weatherization funding until 15 years after the previous weatherization. However, they may still receive non-weatherization assistance, such as energy education and evaluation services.

(2) This policy applies to all Federal funds, including LIHEAP, HUD, and USDA programs. Allowing re-weatherization for homes weatherized at least 15 years ago ensures those that previously received limited services can benefit from advanced energy audits and health and safety improvements.

(3) The WV WAP follows DOE regulations to verify eligibility before weatherization. Each applicant's address is checked in the WV WAP database to confirm no weatherization services were provided within the past 15 years. If records show prior services, the subrecipient verifies with the client. Due to potential 911 address changes, an energy auditor also conducts a visual inspection. Since September 15, 2011, standardized tags have been placed in weatherized homes for easier identification.

(4) If no evidence of prior weatherization exists, services may proceed. Homes weatherized before the 15-year threshold may be eligible for re-weatherization.

vii) **Cooperation With Disaster Planning and Relief:**

(1) The DOE issued [Weatherization Program Notice 24-1](#) to address Disaster Planning and Relief allows for additional work to be done on homes due to natural disasters. In the event of a declared Federal or State disaster, allowable expenditures under WAP include:

(a) The cost of incidental repairs to an eligible dwelling unit if such repairs are necessary to make the installation of weatherization materials effective.

(b) The cost of eliminating health and safety hazards, elimination of which is necessary before the installation of

weatherization materials (10 CFR 440.18(d)(9); 10 CFR 440.18(d)(15).

- (c) To the extent that the services are in support of eligible weatherization (or permissible “Re-weatherization”) work, such expenditure would be allowable.
- (2) In a declared Federal or State disaster, weatherization crews may re-weatherize a previously completed unit “damaged by fire or an act of God”, regardless of the original weatherization date (10 CFR 440.18(f)(2)(ii)). Local authorities must determine the dwelling is salvageable and habitable, and the damage must not be covered by insurance or other compensation.
  - (a) Debris removal from a dwelling unit that is not to be weatherized would not be an allowable cost.
  - (b) Weatherization personnel can be paid from DOE funds to perform functions related to protecting the DOE investment. Such activities include: securing weatherization materials, tools, equipment, and weatherization vehicles, or protection of local subrecipient weatherization files, records and the like during the initial phase of the disaster response.
  - (c) Using DOE funds to pay for weatherization personnel to perform relief work in the community as a result of a disaster is not allowable.
  - (d) Local agencies may use weatherization vehicles and/or equipment to help assist in disaster relief provided the WAP is reimbursed according to the DOE Financial Assistance Regulations, 10 CFR Part 600 and 2 CFR 200.
- (3) WAP rules prioritize weatherization assistance for the elderly, persons with disabilities, families with children under 18, high energy users, and households with high energy burdens (10 CFR 440.16(b)). Households in disaster areas may also be prioritized if they meet eligibility criteria and have no insurance claims or other compensation for disaster-related damage.
- (4) In the event of a Federal or State work stoppage, WVDED will follow DOE or Governor’s Office guidance and communicate updates to subrecipients. Onsite WAP work will resume once mandates are lifted and safe return-to-work procedures are in place.

viii) **Weatherized Unit Tagging Procedures**

- (1) WV WAP’s Weatherized Unit Tagging Procedure requires the placement of a permanent and standardized tag on each completed dwelling unit including the following information:
  - (a) Subrecipient Name
  - (b) West Virginia Weatherization Assistance Program
  - (c) Sequential Number
  - (d) “DO NOT REMOVE” indication
  - (e) Initials of QCI and date of Inspection
- (2) Subrecipients must attach two tags in designated dwelling locations to ensure permanence, with photo documentation maintained in the client file. Failure to comply may result in the unit not being

accepted as a “Completion,” potentially disallowing associated costs. This procedure also ensures accountability for the subrecipient and Quality Control Inspector providing weatherization services.

**ix) Weatherization Readiness Funds (WRF)**

(1) In accordance with DOE WPN 23-4: Weatherization Readiness Funds Expansion of Scope; funding has been set aside which is specifically targeted to reduce the frequency of deferred homes that require services outside the scope of weatherization before the weatherization services can commence. Units receiving WRF must result in a DOE completion defined as: “A dwelling on which a DOE approved energy audit or priority list has been applied and weatherization work has been completed.”

(a) West Virginia WAP will follow DOE requirements on the use of WRF funds. For details on WV WAP’s policies on WFR, see WV WAP WRF Procedure Policy.

**V.1.3 Definition of Children**

Definition of Children (Below the age of): 18

**V.1.4 Approach to Tribal Organizations**

Per federal rule, West Virginia recommends that tribal organizations not be treated as local applicants for the Weatherization Assistance Program. However, per 10 CFR 440.16(f), low-income Native Americans will receive benefits equal to those provided to other eligible low-income individuals in the state.

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

1) The method used to select each area to be served by a weatherization project will be as follows:

- a) All fiftyfive (55) counties in West Virginia will be served by the WV WAP.
- b) Selection of weatherization subrecipients or qualified entities is made pursuant to 10 CFR 440.15.
- c) Subrecipients in the State operate the WAP in service areas designated by specific counties, barring any unforeseen circumstances necessitating service area alteration. Subrecipients may contract with one another in efforts to more efficiently and effectively provide weatherization services to all counties within a subrecipient’s service area.
- d) In the event that WVDED determines that a subrecipient fails to meet WV WAP Grant Agreement requirements, options include (but are not limited to) allocating the funds to other eligible subrecipients or qualified entities in the State

**2) Redistribution Provision:**

WVDED may reallocate funds between cost categories, functions, activities, and subrecipients to fully utilize the award during the budget period. All budget changes will comply with 2 CFR 200.308(e) and other applicable federal regulations. Criteria for subrecipient allocation adjustments are outlined in WV WAP Grant Agreements, ensuring compliance with federal rules.

## V.3 Priorities

- 1) WV WAP will prioritize weatherization waitlist clients by assigning points to households with high energy burden or use. Additional points will be given for households with elderly (60+), disabled individuals, or children (18 or younger).  
Clients can be considered a high energy burden if:
  - a) Twenty percent (20%) or more of the household income is utilized to pay for energy usage; and/or
  - b) Clients are eligible for the Energy Crisis Intervention Program (ECIP), an emergency heat services component of the LIHEAP funding the WV WAP receives from the West Virginia Department of Health and Human Resources (DHHR).Clients can be considered high energy users if:
  - c) Clients will be considered high energy users if \$2,100 or more is expended by the client on residential energy annually. High energy burden users are users who spend 20% or more of their annual income on residential energy annually.
- 2) WV WAP has added priority features to enhance DOE-required categories and ensure efficient program implementation. Applicants receiving LIHEAP Emergency Crisis or Repair and Replacement assistance may be given additional points by the agency, allowing for timely, comprehensive weatherization services and improving program efficiency and cost savings.
- 3) Clients in eligible multifamily projects may receive priority to ensure project completion, even if not at the top of the list. WVDED requires subrecipients to plan in advance and ensures multifamily projects do not replace services for single-family homes, which make up most WV WAP completions.
- 4) WVDED has developed a point system within the WV WAP data management system, WAPLink, to prioritize clients eligible for weatherization work:
  - a) 10 points for high energy users
  - b) 10 points for high energy burden clients
  - c) 5 points for elderly clients (60 years or older)
  - d) 5 points for clients with disabilities
  - e) 5 points for households with children under 18 years old
- 5) Households will be prioritized by the number of points, with a maximum of 35 points, followed by those with the longest wait times, in case of ties. Subrecipients must follow the prioritization system in the data management system unless directed otherwise by WVDED. WVDED may adjust the system during the Program Year to align with rule changes or new funding but will maintain the focus on efficiently serving low-income clients and reducing energy costs. Subrecipients may not alter the system without written WVDED approval.
- 6) The data management system ensures subrecipients select only high-priority clients for service, unless approved by WVDED. A flexible pool of high-priority clients allows for selection while maintaining service priority. WVDED expects all counties to receive efficient weatherization services and will monitor and adjust the process as needed.

## V.4 Climatic Conditions

- 1) The International Energy Conservation Code (IECC) has defined two (2) distinct climate zones that cover West Virginia. These climate zones help approximate the performance of a building within each zone due to the effects of heating cooling demand, precipitation, and relative humidity.
- 2) Energy audits are adjusted to reflect local climate conditions and must specify the model climate used from DOE-approved auditing software (Weatherization Assistant). WV WAP subrecipients use two zones: Zone 1 (Charleston, WV) and Zone 2 (Elkins, WV). However, the subrecipient serving Brooke, Hancock, Ohio, and Marshall counties uses Zone 3 (Pittsburgh, PA) for a more accurate climate match
- 3) Cooling Degree Days (CDD) and Heating Degree Days (HDD) data is submitted as an attachment to the application. A summary of the data for all three (3) zones is as follows:

Zone 1 – Charleston, WV:	Zone 2 – Elkins, WV:	Zone 3 – Pittsburgh, PA:
CDD – 1031	CDD – 346	CDD – 654
HDD - 4646	HDD – 6120	HDD – 5968

The HDD and CDD data used for analysis was obtained from: [ClimateZone.com](https://climatezone.com)

- 4) Based on the cooling degree days and dual climate zones, the WV WAP has included specific cooling measures under certain circumstances as detailed under Section V.7 Health and Safety.

## V.5 Type of Weatherization Work to be Done

### V.5.1 Technical Guides and Materials

- a) All measures and repairs on client homes will be performed in accordance to the DOE-approved energy audit procedures and 10 CFR 440 Appendix A. All Subgrantee agreements and vendor contracts will contain language which clearly documents the SWS for work quality outlined in DOE WPN 22-4, Section 1. WVDED hired Santa Fe Community College to update the WV Single Family and Manufactured Field Guide Instruction Manuals for PY 2022–2023. With DOE approval on 2/6/23, WVDED and WV WAP subrecipients will continue following the current SWS for Single Family Site-Built and Manufactured Housing.
- b) Electronic copies of WV’s current DOE-approved field guides are accessible to all subgrantees in the data management system
- c) WVDED distributes West Virginia Weatherization Program Notices (WV WPN) and Weatherization Bulletins (WV WxBulletin) via email to provide guidance on program updates and changes. These notices supplement DOE Weatherization Program Notices and form the basis of the WVDED Field and Administration Guide (F&A Guide), which is updated as new WV WAP policies or DOE guidelines are issued. Specifications for work to be inspected are outlined in the subrecipient DOE WAP Grant Agreement, and contractors must adhere to the same technical requirements, ensuring all work meets WV WAP standards.
- d) Additional training as necessary on WV WAP SWS is provided to subrecipients as detailed in Section V.8.4 Training and Technical Assistance to ensure consistent compliance throughout the network.
- e) Example of Subgrant Agreement/Contract Language:



**WAP Standards** – The subrecipient shall perform weatherization services during the Program Year in accordance with the approved **WV DOE WAP State Plan**, the **WV WAP Standard Work Specifications (WV WAP SWS)** which functions as WV WAP Standards and Field Guide, and other WV WAP manuals or directives as applicable and any amendments thereto. The subrecipient’s signature on this Agreement signifies its responsibility to follow all work standards as outlined in the documents referenced in this paragraph, as well as the subrecipient’s responsibility to ensure weatherization staff and subcontractors receive and review these documents and use them to guide the weatherization work performed in client homes. The terms of these documents are incorporated in this Agreement and form the basis of decisions concerning weatherization field work and administrative requirements unless otherwise noted by the Pass-through entity

**Subcontracts** - The subrecipient shall ensure all subcontracts are in compliance with 2 CFR 200, as well as any applicable rules and regulations of 2 CFR 910, and 45 CFR 75. As per 2 CFR 200.326, the subrecipient contracts must contain the applicable provisions described in Appendix II to Part 200 - “Contract Provisions for non-Federal Entity Contracts Under Federal Awards” as well as applicable provisions as per 2 CFR 200.101. Subrecipient subcontracts will be reviewed as part of the WAP monitoring process or upon request of the Pass-through entity.

All such subcontracts shall contain provisions specifying:

- i) That the work performed by the subcontractor must be in accordance with the terms of the Program Year 2025 DOE State Plan and the 2025 Grant Agreement between the WVDED and the subrecipient;
- ii) That nothing contained in such subcontract agreement shall impair the rights of the WVDED;
- iii) That nothing contained herein, or under the Grant Agreement will create any contractual relation between the subcontractor and the WVDED;
- iv) That the subcontractor specifically agrees to be bound by the confidentiality provision found in Section XI.B (4) Personally Identifiable Information set forth in the PY 2025 Grant Agreement;
- v) That the subrecipient will be responsible for ensuring all subcontracted work is performed per Federal and State regulations and policies in order to be eligible for reimbursement of the approved work;
- vi) That the subrecipient will ensure that all Federal flow down provisions are included in the subcontract agreement per Federal guidelines; and
- vii) The subrecipient, by signing the PY 2025 WVDED/Subrecipient Grant Agreement, agrees to follow all provisions of the State Plan, including but not limited to, production, facilitation, operations, health and safety, and administrative requirements/regulations. Grant Agreements are submitted electronically for signature and are returned electronically. A handwritten or electronic signature is

*allowable. WVDED conducts an Annual State Plan meeting held in July of the new Program Year to review the new State Plan and Grant Agreements. Attendees of this meeting include Executive Directors/Chief Executive Officers, Weatherization Coordinators, and Financial staff.*

b) Approved Material and Field Guide Dates:

**Special Materials/Audit Procedures Approvals:**

Item	Comments
Light Emitting Diode (LED) Lighting	Approved by DOE 6/13/21
Refrigerators	Approved by DOE 6/13/21
Domestic Water Heaters (DWH)	Approved by DOE 6/13/21

**General Heat Waste Measures:**

Item	Comments
Domestic Water Heater Tank and Pipe Wrap (on first six feet of hot water pipe exiting water heater)	Approved 7/13/2021
Low-Flow Aerators and Showerheads	Approved 7/13/2021
Limited weather stripping and caulking to increase comfort (does not include major air sealing work, which should be guided by blower door testing)	Approved 7/13/2021
Furnace or air conditioner filters	Approved 7/13/2021

**Field Guides:**

SingleFamily:	Approved 2/6/2023
Manufactured Housing:	Approved 2/6/2023
MultiFamily:	N/A

## V.5.2 Energy Audit Procedures:

Table 1 - Field Guide Approvals	
Installation Standards/FG Type	Expiration Date
Site Built Single Family Housing	02/06/2028
Manufactured Housing	02/06/2028
Large Multifamily Housing	N/A - WV has no LMH EA approval

Table 2 - Energy Audit Tool Approvals		
Tool	Building Type	Expiration Date
WAPLINK (WAweb API)	Site-Built Housing (SBH) (1-4 Units/building)	11/15/2026
WAPLINK (WAweb API)	Manufactured Housing (MH)	11/15/2026
N/A	Multi-family	MDUs with more than 5 units, individually heated/cooled - NEAT Audit Sampling* DOE PO Approval required

Table 3 - Priority List Approvals		
Building Type	Housing Characteristics That Priority List Applies to	Expiration Date
Site-Built Housing (SBH) (1-4 Units/building)	DOE Sponsored PL for Region 3	11/15/2026
Manufactured Housing (MH)	DOE Sponsored PL for Region 3	11/15/2026

- 1) *\*Audit Sampling:* To ensure a true representation of the building, an audit(s) must be completed on apartments with different configurations and heat loss characteristics (ex: 1 bed. bottom floor, 1 bed. middle floor, 1 bed. top floor, 2 beds. bottom floor). An audit of at least twenty five percent (25%) of the total number of units in each building must be conducted. Each audit must include pre, interim, and post photo documentation of all recommended measures and any work performed on the dwelling. All photo documentation must be uploaded to the information database system for weatherization.
- 2) WVDED received the approval for WV WAP SWS Field guides on 2/3/23. WVDED and WV WAP subrecipients will continue to work under the current WV WAP SWS for Single Family Site Built and Manufactured Housing.

- 3) WV WAP uses the Weatherization Assistant (WA) software as its energy audit tool. The Weatherization Assistant energy audit software was developed by Oak Ridge National Laboratory specifically for the use for the Weatherization Assistance Program. There are two (2) components to the Weatherization Assistant software: The National Energy Audit Tool (NEAT) for single family houses and the Manufactured Home Energy Audit (MHEA) for mobile homes. WV WAP currently uses WAPLINK (WAweb API).

### **Multifamily**

- 4) Until MulTEA is implemented and subrecipient auditors receive accredited training, WVDED follows the Multiple Dwelling Unit Policy and Guidance, updated per DOE WPN 22-12 and WPN 22-13. WVDED will continue to seek input from the DOE Project Officer as needed. Multifamily units, defined as buildings with five or more units, can be weatherized if 66% of the occupants (50% for duplexes and quadruplexes) qualify for weatherization assistance under 10 CFR 440.22.
- 5) The majority of eligible units in West Virginia are garden-style apartments, typically with fewer than 25 units, three stories or fewer, where units are individually heated/cooled and have exterior access. These will be the focus of WV WAP's multifamily weatherization efforts. Each unit, including those with fewer than five units, must follow the audit procedures and documentation requirements in the WV WAP Multiple Dwelling Unit Policy and Guidance. WVDED must approve the project before weatherization begins, and at least 25% of units with different configurations and heat loss characteristics must be audited.
- 6) For multifamily projects with more than four units, WVDED must submit the project for DOE Project Officer review and approval. WV does not have a multifamily audit tool for buildings with fewer than 25 units, so those not modeled in Weatherization Assistant will be submitted to DOE for approval.

### **V.5.3 Final Inspection**

- 1) Certified Quality Control Inspectors (QCIs) must perform a final inspection of each dwelling unit before it is considered complete. The inspection, using the WV WAP "QCI form," certifies that the work meets audit priorities outlined in 10 CFR 440.21. Only Home Energy Professional (HEP) certified QCIs may conduct inspections during PY 2025-2026, and all subrecipients have demonstrated competency through HEP QCI certification.
- 2) QCI credentials are maintained in the database system and reviewed by WVDED periodically and during annual monitoring. WVDED ensures all QCI staff certifications are valid and approves training and certification before reimbursing expenses.
- 3) In 2023, WVDED revised the standardized QCI form to align with DOE's quality assurance guidelines, ensuring uniform final inspections at the subrecipient level. The inspection confirms that work follows the Weatherization Assistant audit and meets required standards, with signatures certifying compliance. WVDED also ensures compliance with DOE WPN 22-4 through its monitoring process, verifying that work meets WV WAP SWS criteria.
- 4) Disciplinary Actions:
  - a) If a subrecipient QCI is found not to be following state-adopted standards during monitoring, WVDED will initiate a Quality Improvement Plan (QIP) as outlined in Section V.8.3. Monitoring Activities, and consider potential disciplinary actions as

per the BPI HEP QCI Certification Scheme Handbook. WVDED will collaborate with the subrecipient to determine the best course of action, including internal corrective steps and external training or technical assistance.

- b) Depending on the nature and severity of the issues found, per BPI HEP QCI Certification Scheme Handbook, Appendix A Code of Conduct, WVDED may take disciplinary or punitive actions including but not limited to:
  - i) Denial or suspension of eligibility
  - ii) Denial of certification
  - iii) Revocation of certification
  - iv) Nonrenewal of certification
  - v) Suspension of certification
  - vi) Reprimand
  - vii) Other corrective action.
- 5) Staffing limitation:
  - a) WV WAP combines the DOE's Independent QCI and Independent Auditor/QCI policies. All subrecipients must have separate Energy Auditors and QCIs. WVDED will follow monitoring guidelines for completed units as per DOE WPN 22-4. Subgrantees cannot have the same QCI perform **both** the energy audit and final inspection for the same unit. If a subgrantee cannot meet this requirement, they must submit a written request with justification to WVDED for approval to use the same Energy Auditor and QCI for the same unit during the program year.
  - b) WVDED will work with subrecipients to train and certify enough staff to separate Auditor and QCI duties where possible. As outlined in Section V.8.4, additional QCI training and certifications will be offered as funding allows. Monitoring efforts will ensure the integrity, impartiality, and quality of inspections.
  - c) WVDED will not accept partial weatherization as a completed dwelling. A unit is only considered complete if all audit measures are done, reviewed, signed off by a certified QCI, and all required documents are uploaded into the data management system. The QCI signature date will be the completion date, with no further work allowed on the unit.
  - d) In rare cases where a client does not allow a QCI inspection or if work is halted for unforeseen reasons (e.g., safety concerns, death, dwelling vacated), the subrecipient must notify WVDED. If work is stopped, documentation must be entered into the client file, and allowable expenses can be submitted, but the dwelling will not count as completed. This exception is rare and only approved if all reasonable attempts to complete the work, including the final inspection, have been made. WVDED will also explore other funding sources if applicable.

## V.6 Weatherization Analysis of Effectiveness

- 1) WVDED conducts various analyses of the WV WAP throughout the program year, focusing on state-level, subrecipient-specific, and process-related data. Routine data collection supports general oversight, while targeted investigations address specific issues using different tools and database reports. Program production, goal attainment, and expenditure rates are tracked monthly for each subrecipient using a statistical analysis tool. Periodically, these statistics are reviewed, and feedback or technical assistance is provided to subrecipients who fail to meet goals, benchmarks, or

compliance expectations. Subrecipients also use this tool to track their own production and expenditures, enabling local program evaluations and goal adjustments as needed.

- 2) A monthly “Dashboard” summarizes the statewide weatherization program’s status, including expenditure data, health and safety percentages, completion rates, and average job cost. WVDED also developed supplemental spreadsheets for more detailed breakdowns, including expenditures per funding source, average job costs, dwelling types served, and fuel types addressed.
- 3) WVDED establishes production and expenditure benchmarks in subrecipient WAP Grant Agreements to enhance accountability and ensure proper program management. The WV WAP uses a database management system to track all weatherization work, supported by statistical tools and spreadsheets that facilitate program oversight. The review process, including desktop reviews, ensures compliance and verifies that measures and health and safety tests are performed and documented correctly. This review also helps identify trends, training needs, or specific jobs requiring monitoring.
- 4) The “Weatherization Assistant Recommended Measures Output Report” data allows WVDED to analyze productivity and energy savings by subrecipient and measure. In PY 2025-2026, WVDED will continue collecting data and enhance reporting capabilities to optimize future analysis. WVDED also reviews Weatherization Audit Tool usage during monitoring visits to ensure up-to-date material and fuel costs in the system, ensuring accurate cost-effectiveness evaluations.
- 5) As outlined in Section V.8.3, WVDED tracks subrecipient deficiencies using a “Root Cause Analysis” spreadsheet, identifying performance trends over time. This analysis helps prioritize training and technical assistance activities. Continuous data collection, analysis, and process improvements keep WVDED on a path of ongoing support and oversight, helping subrecipients deliver effective weatherization services.
- 6) During monitoring, WVDED ensures subrecipients have internal evaluative processes (e.g., Quality Control Inspector) to identify issues early. This helps WVDED identify training needs and ensures deficiencies are addressed through Quality Improvement Plans (QIP). WVDED follows up on QIP progress through desktop monitoring or onsite visits as necessary.

## **V.7 Health & Safety**

- 1) The WV WAP Health and Safety Plan is included as an attachment. A “Material Identification Chart” is also included as an attachment as part of the WV WAP Health and Safety Plan which assists in identification of health and safety, incidental repair, and ancillary materials/measures.

## **V.8 Program Management**

### **V.8.1 Overview & Organization**

- 1) The division of WVDED in which the WV WAP – in addition to the other programs listed in the paragraph below operates is the West Virginia Community Advancement and Development (WVCAD).
- 2) The WV WAP is overseen by the WVCAD Director. The WVCAD division’s programs and functions are divided into two(2) units/groups:
  - a) Sustainability



- b) Infrastructure
- 3) The WV WAP is not responsible for the State Energy Program, which is administered by the West Virginia Division of Energy (WVDE).

#### **V.8.2 Administrative Expenditure Limits**

- 1) In accordance with 10 CFR 440.18(e), no more than 7.5% of the new program year (PY) allocation will be used by the state for administrative purposes, and no less than 7.5% will be made available to subrecipients. In total, no more than 15% of the allocation can be used for administrative duties. The state will not provide an additional 5% to subgrantees with grants under \$350,000 from the new PY allocation funds. Any unused administrative funds by WVDED will be redistributed to subrecipients before the end of the grant period.
- 2) The State Plan includes a redistribution provision, allowing the grantee to manage the grant actively and move funds as necessary to fully allocate the budget. This may include transferring funds between subrecipients, and all budget adjustments will comply with applicable federal rules and regulations.
- 3) DOE permits a separate budget category for financial audits. Previously, these audit costs were charged to the administrative cost category, which often led to inadequate audits. To address this, WVDED allows subrecipients meeting the 2 CFR 200 threshold to cover these costs from a separate category. These charges will only include the weatherization portion of the audit costs.

#### **V.8.3 Monitoring Activities**

- 1) **Introduction:** Monitoring is a systematic process that involves gathering and evaluating information, as well as physically visiting sites, to support and assess subrecipients and their programs in terms of performance, capacity, and compliance. WVDED conducts monitoring in accordance with applicable laws, including regulations in 10 CFR Part 440 (specifically 10 CFR 440.23(a)), 2 CFR 200 (specifically 2 CFR 200.331), 2 CFR 910, and 45 CFR Part 75. Monitoring is also conducted in alignment with DOE Weatherization Program Notices (WPNs), including DOE WPN 22-4 and WPN 20-4, along with other policies and procedures issued by the DOE.
- 2) **Approach**
  - a) WVDED will conduct monitoring of each subrecipient at least once a year, providing a written report to the subrecipient and maintaining both electronic and physical files related to the monitoring process. These files will be accessible to DOE during its monitoring visits. For subrecipients with an independent QCI, WVDED will monitor at least 5% of completed dwelling units. This percentage may increase based on identified issues or the capacity of WVDED staff.
  - b) The monitoring tools used by WVDED are based on those provided by DOE through WPN 20-4 (Updated Weatherization Assistance Program Monitoring Guidance) and WAP Memorandum 015 (Weatherization Financial Toolkit – 2 CFR 200 Regulations and Procurement Procedures). WVDED has revised these monitoring tools and forms to reflect the updated guidance as well as WV WAP SWS references. Additionally, WVDED has developed a monitoring module within the database management system to support the formation of monitoring reports, Quality Improvement Plans (QIPs), and other aspects of the monitoring process.
  - c) WVDED will also perform periodic off-site, desktop monitoring using the WAPLink data management system to track all weatherization work, often in conjunction with

statistical management tools and related analytical spreadsheets to track production, expenditures, and other performance indicators. This process will serve as both a pre-monitoring activity and routine oversight as necessary.

- d) The monitoring process conducted by WVDED will be divided into three components, which may be performed at different times and may vary in frequency depending on the quality of subrecipient performance in each focus area. These focus areas and their details will be outlined as part of the monitoring strategy:

**(1) Programmatic/Management Monitoring:**

- (a) Subrecipient Production Analysis and Review (ensuring benchmark and yearly goal completion)
- (b) Financial/Administrative Components
- (c) Inventory
- (d) Warehouse
- (e) Rolling Stock
- (f) Eligibility Processes & Compliance
- (g) "Re-weatherization" Compliance
- (h) Compliance with all WVDED mandated forms, processes, & policies
- (i) Database management system usage and reporting
- (j) H&S Components
- (k) Energy Education
- (l) T&TA
- (m) Procurement Practices
- (n) Client Prioritization Methods
- (o) Utility Fund Usage, Documentation, & Reporting
- (p) Insurance Coverage
- (q) Subrecipient Personal Qualifications
- (r) Subrecipient Internal Corrective Action Procedures

**(2) Field/Technical Monitoring:**

- (a) Program Overview (Client File Review, Work Orders, Documentation of measures, etc.)
- (b) Compliance with all WVDED mandated field/technical forms, processes, and policies (ex: Quality Control Inspection form and process)
- (c) Rental unit/Multifamily documentation and process compliance
- (d) Energy Audits (Process and Documentation Weatherization Assistant Audit Program Libraries, inputs/usage, adherence to guidance, etc.)
- (e) Weatherization of Units (all work performed on dwellings – HVAC, shell measures including insulation and air sealing, baseload measures, etc.)
- (f) Zonal and Pressure Diagnostics on all dwelling types
- (g) Health & Safety (HVAC, LSW compliance, ASHRAE 62.2 2016 ventilation requirements, mold/moisture, electrical, etc.)
- (h) Final Inspections/Quality Control process and documentation
- (i) Client interaction and client education process

**(3) Fiscal Monitoring:**

- (a) Financial Policies and Procedures
  - (b) Cash Management
  - (c) Procurement policies and practices
  - (d) Financial management of Material Inventory
  - (e) Financial management of Property and Equipment
  - (f) Contracts/Subawards
  - (g) Payables/Receivables/Expenses Management
  - (h) Invoicing and Reporting accuracy
  - (i) Review of Funding Requests and specific line items/expenses for accuracy and proper documentation
  - (j) Bank records and reconciliation
  - (k) Financial Statements
  - (l) Internal Controls
  - (m) Financial Management of utility (leveraged) funds
  - (n) Single Audits (See A133 Financial Audits (2 CFR 200 Subpart
- (4) Monitors will utilize WAPLink as the monitoring tool. WAPLink is programmed to randomly pull clients to increase transparency for monitoring visits through the Monitoring/Training Module.

**e) Single Audits (2 CFR 200 Subpart F)**

- i) WVDED will verify when the audit was submitted to the Federal Clearinghouse (FAC) and record this information on the “Annual Audit Chart,” which is maintained by the WVDED Fiscal Compliance Monitor. If the subrecipient fails to submit the audit to the FAC by the deadline as per federal regulations, WVDED will send a reminder letter to the subrecipient.
- ii) The WVDED Fiscal Compliance Monitor will review all audits using the “WVDED Passthrough Entity Audit Review Checklist.” An “Audit Review Summary” will be completed for each audit and stored on WVDED’s shared drive. Based on the review results, WVDED will send the subrecipient one of two letters: (1) a letter indicating no findings or (2) a letter requesting a Corrective Action Plan (CAP). The subrecipient must submit the CAP within six (6) weeks if applicable.
- iii) If the subrecipient fails to submit the CAP by the deadline, a “CAP Reminder Email” will be forwarded to the Executive Director. Upon receipt of the CAP, WVDED will review it and send the subrecipient either (1) a “CAP Acceptance Email” or (2) further correspondence requesting modifications to the CAP. As a passthrough entity, WVDED is required to follow up and issue a management decision for federal award findings related to the programs it administers, in compliance with 2 CFR 200.
- iv) Currently, all WAP subrecipients expend more than \$750,000 in federal funds each fiscal year and are therefore required to undergo a Single Audit.

**f) Pre-Monitoring Procedures**

- i) WVDED will provide timely notification of monitoring to subrecipients and complete some parts of the monitoring prior to arriving onsite for monitoring. Those activities include:
  - (1) Distribution of official notifications of monitoring at least thirty (30) days prior to on-site monitoring by email to Executive Director/CEO, CFO/Finance Director, and WAP Coordinator. Official notifications

will direct the subrecipient how to prepare for the review and WVDED's expectations. The subrecipient should confirm receipt of the notification and respond within 48 hours if the dates for monitoring need to be changed for any reason.

- (2) During the week before the scheduled on-site visit, the WVDED monitoring team will confirm arrival times and arrange any necessary logistics.
- (3) An assigned field/technical monitor will contact the subrecipient with a job monitoring pool to schedule jobs to be monitored at least one (1) week prior to on-site monitoring.
- (4) Monitors will conduct desktop reviews of relevant information to increase efficiency on-site.

**g) Desktop Review Schedule**

- i) Desktop reviews may be conducted on a quarterly basis through the WV WAP data management system's Monitoring/Training Module. Field Monitors will select a specific item to review, such as deferrals, QCI form completion, income verification, etc. Jobs will be randomly chosen by the system, and the reviewing monitor(s) will rotate quarterly.
- ii) Once the desktop review is complete, subrecipients will receive an email notification. The notification will include instructions on how to respond to the monitoring, and any identified issues will be addressed with the subrecipient. If necessary, required actions for compliance will be outlined.

**h) Monitoring Staff**

- i) Monitoring will be performed by several WVDED staff members with credentials and areas of expertise to effectively monitor all the various components of the WV WAP as outlined above. Monitoring staff members may monitor more than one (1) component. The monitoring staff are supervised by the WAP Manager and the different components of monitoring are coordinated by the WAP compliance team leader. The WAP Manager reviews and approves each report. The WV WAP Monitoring Team consists of the following:

**(1) Weatherization Compliance Specialists: (2 team members)**

**Qualifications for Programmatic Monitors:** The essential responsibilities of these team members include conducting programmatic monitoring of Weatherization and other energy-related programs. Program monitors follow established monitoring procedures to conduct thorough reviews of Subrecipients performance to prepare comprehensive reports of programmatic monitoring results, and follow up with programmatic monitoring. A bachelor's degree is preferred for this position; however, as a substitution, work experience in compatible fields will be considered. Professional development is prioritized to develop the skills and knowledge needed to excel in this position.

**Qualifications for Financial Monitors:** The essential responsibilities of these team members include conducting financial monitoring of Weatherization and other energy-related programs. Financial monitors follow established monitoring procedures to conduct thorough reviews of Subrecipients performance to prepare

comprehensive reports of fiscal monitoring results, and follow up with fiscal monitoring. A bachelor's degree is preferred for this position; however, as a substitution, work experience in compatible fields will be considered. Professional development is prioritized to develop the skills and knowledge needed to excel in this position. The Financial Monitor also works with WVDED's CFO and experienced accounting staff for additional support during monitoring activities.

**(2) Weatherization Technical Specialists: (3 team members)**

**Qualifications for Technical Monitors:** The essential responsibilities of these team members are to perform complex monitoring functions of Weatherization and other energy-related programs. Weatherization Technical Specialists monitor and promote compliance with grant requirements and provide technical assistance as necessary to ensure grant funds are properly spent and appropriate records maintained. Field Monitors maintain weatherization program experience and building science knowledge. They hold BPI certifications (including HEP QCI), a Weatherization Assistant Training Certificate, and past WV WAP-specific certifications, such as Energy Auditor and Quality Control Inspector. These credentials, though superseded by HEP or other certifications, provide a solid foundation. They also attend regional and national energy conferences.

- ii) WVDED staff have completed several 2 CFR 200 Uniform Guidance trainings in recent years. In Program Year 2025, the Weatherization Program Manager and Assistant Administrator will attend a refresher training. WVDED will seek further training on new regulations as needed and pursue additional certifications throughout the Program Year.

**i) Monitoring Expenditures**

- i) Monitoring staff will be paid from the Training and Technical Assistance (T&TA) budget, except for the Fiscal Monitor and WAP Manager, who will be paid from the Administrative budget due to their broader roles. 30% of the Fiscal Monitor and three Weatherization Compliance Specialists (performing technical, fiscal, and programmatic monitoring) will be paid from DOE T&TA funds. WVDED has budgeted \$26,000 from DOE funds for monitoring travel expenses, supplemented by LIHEAP funds.

**j) Monitoring Schedule**

- i) The monitoring schedule typically includes one or two visits per month with some variation based on the program year's start and factors like holidays or leave. WVDED will finalize the schedule within the first quarter of the DOE grant cycle (July-September) and will share a preliminary schedule for confirmation or adjustment by subrecipients. The monitoring schedule will be determined based on risk assessment factors and subrecipient production.
- ii) If conflicts arise after the final schedule is set, subrecipients must notify WVDED as soon as possible. WVDED will avoid back-to-back visits to allow staff time for report preparation. Visits may increase if significant deficiencies are found, with priority given to subrecipients with unresolved

issues from the previous program year. The schedule will also consider risk assessment, location, and time of year.

**k) Monitoring Visit**

- i) A typical visit can be expected to require three (3) to five (5) days on-site. The onsite visit process will include the following:
  - (1) An entrance interview during which any concerns or questions about the review can be discussed between WVDED and subrecipient staff.
  - (2) Requests of documentation for review including, but not limited to, subrecipient policies, procedures, program documents, client files, and financial records.
  - (3) Conducting interviews with program staff regarding program operations and job functions.
  - (4) Conducting interviews with administrative and fiscal staff.
  - (5) Inspecting completed weatherized dwelling units.
  - (6) Inspecting Weatherization assets including but not limited to warehouse(s), material inventory, tools, equipment, and vehicles.
  - (7) Offering a daily update to the subrecipient regarding the progress of the review and issues that have already been found.
- ii) The staffing and credentials of a subrecipient determine the number of completed dwelling units WVDED must inspect, per DOE WPN 22-4. For subrecipients with an independent QCI, WVDED will monitor at least 5% of completed units. If the Auditor also serves as the QCI, WVDED will monitor at least 10%. These percentages may increase based on identified issues or staff capacity. Additionally, WVDED will review units “in progress” beyond these thresholds to assess quality, compliance, materials, energy audits, final inspections, safe work practices, and other relevant factors.
- iii) Monitoring inspections include a review of the Weatherization Assistant audit and verification that work order measures were appropriate based on the SIR. All inspections and data are documented in WAPLink.
- iv) After each monitoring visit, an Exit Conference is held with subrecipient representatives to discuss strengths, weaknesses, findings, call-backs, recommendations, and training needs. Required actions may include staff training or technical assistance.
- v) Per DOE WPN 20-4, WVDED will provide a written report within 30 days, outlining findings, recommendations, commendations, and any required corrective actions (QIP). Subrecipients typically have 30 days to respond unless severity requires a faster response. Failure to respond may result in disciplinary action.

**l) Corrective Action, Discipline and/or Removal of a Subrecipient from the WAP**

- i) WVDED reviews each subrecipient's QIP, either approving the corrective actions or requesting further information or adjustments. Follow-ups ensure that corrective actions are implemented through subsequent monitoring visits, desktop reviews, or required documentation. WVDED provides training and technical assistance as needed. If a subrecipient contests a deficiency, WVDED will either uphold or revise the finding and offer further guidance.



- ii) WVDED may increase monitoring visits and unit reviews until compliance is assured. If sustained compliance cannot be demonstrated, every potential job may be reviewed before approval. Significant findings—such as health and safety violations, poor installations, or missed measures—require timely corrective action. Immediate dangers must be addressed by the subrecipient without delay.
- iii) WVDED will report subrecipient noncompliance or repeated unresolved findings (after at least two monitoring visits) to the DOE Project Officer. Serious issues, such as waste, fraud, or abuse, must be reported immediately.
- iv) Once findings are resolved and preventative measures are in place, WVDED will resume standard sampling rates for that subrecipient.
- v) If repeated monitoring and technical assistance fail to resolve issues or a subrecipient does not respond, WVDED will initiate disciplinary actions, including imposing additional requirements. Subrecipients will be informed of the nature, reasons, necessary corrective actions, and deadlines for compliance.
- vi) Depending on the type of noncompliance issue and/or action, additional requirements may include but are not limited to:
  - (1) Withholding disbursement of grant funds until noncompliance issues are corrected
  - (2) Disallowing completions that do not meet program standards
  - (3) Placing the subrecipient on an “At Risk” status
  - (4) Suspending part or all of the program for the subrecipient
  - (5) Asking the subrecipient to voluntarily relinquish the program
  - (6) Removing part or all of the program from the subrecipient
  - (7) Requiring payments as reimbursement rather than advance payments
  - (8) Requiring all weatherized dwelling units to be inspected by a third party before being turned in for completions
  - (9) Requiring additional, more detailed reporting
  - (10) Termination of the Weatherization Subgrant Agreement
- vii) Once the noncompliance issue is resolved, WVDED will promptly remove the additional requirements and notify the subrecipient in writing.
- viii) A Subrecipient wishes WVDED to reconsider the imposed requirements, they must submit a written request within two weeks of notification, including the following:
  - (1) Detailed reason why WVDED should reconsider imposing additional requirements
  - (2) Evidence that the issue of noncompliance has been satisfactorily resolved
  - (3) A plan to prevent similar issues of noncompliance going forward
  - (4) Within thirty (30) days of receiving the above information from a subrecipient, WVDED will either sustain or remove the additional conditions and disciplinary actions imposed.

**m) WAP Grant Award Termination**

- i) If WVDED determines that all remedies for noncompliance have been exhausted or uncovers definitive waste, fraud, or abuse, the subrecipient’s

WAP grant will be terminated. WVDED will provide written notification stating the cause of termination.

- ii) To contest the termination, the subrecipient must submit evidence within one week proving the issue has been resolved or that WVDED's determination was inaccurate. WVDED will respond within 30 days, either upholding or reversing the termination.

**n) Tracking & Analysis**

- i) WVDED tracks the entire subrecipient monitoring process—from notification to final resolution—using a “Monitoring Log.” Significant deficiencies are recorded in a “Root Cause Analysis” spreadsheet to identify trends and assess subrecipient performance. This process helps determine training and technical assistance needs, supporting continuous improvement for both WVDED and subrecipients.

## **V.8.4 Training and Technical Assistance Approach & Activities**

**1) Approach:**

- a) WVDED will continue its “as needed, per person” training approach, allowing flexibility as subrecipients hire new staff, certifications expire, and specific training needs arise. Training opportunities will be available year-round to accommodate subrecipients' production schedules. Instead of rigid class schedules that may disrupt operations, subrecipients can integrate training into their workflow while ensuring timely completion of required certifications.
  - b) Certification timeframes are determined by licensing bodies such as BPI and the West Virginia Fire Marshal. WVDED requires recertification every three (3) years for Energy Auditors (EAs) and Quality Control Inspectors (QCIs), with CEUs approved through Training Requests. Crew Leaders and Retrofit Installers follow a five-year recertification cycle, with optional refresher courses available as needed.
  - c) WVDED tracks all required licenses—including HVAC and electrician licenses, EPA Section 608 Refrigerant Certification, and Lead Safe Work certification—through desktop monitoring and annual onsite reviews. Each subrecipient receives a detailed Programmatic Report listing certifications, expiration dates, and compliance status. Subrecipients are responsible for monitoring new hires through on-the-job training, shadowing, and review of audit data to ensure competency before working independently.
  - d) Training attendance is mandatory unless WVDED grants an exemption. Training expenses are reimbursed based on approved Training Requests, with awards determined by subrecipient needs, DOE grant applications, and past training participation. WVDED tracks spending through monthly invoices and expenditure reports, ensuring accountability.
  - e) Subrecipients must submit a quarterly list of anticipated WAP-related training needs as part of the grant application process. This proactive planning ensures compliance with federal, state, and program training requirements, preventing uncertified staff from working unsupervised.
- 2) T&TA funding covers WVDED staff salaries, travel, and operational costs for monitoring and providing technical assistance to subrecipients. Subrecipient participation in T&TA activities, including conferences, is funded through DOE T&TA and other sources like LIHEAP. These activities aim to enhance WAP efficiency, quality, and effectiveness by**

maximizing energy savings, minimizing costs, improving program management and work quality, and reducing waste, fraud, and mismanagement.

- 3) WVDED assesses training needs regularly as part of a constant process as the program year progresses. This process and the related training plan are flexible and WVDED incorporates information from the process into the training plan as needed. WVDED assesses T&TA needs of its subrecipients through these avenues:

- a) WVDED monitoring efforts
- b) Internal trend analysis
- c) Training Needs Assessment Surveys
- d) Prompts in subrecipient grant applications
- e) Communication with national experts regarding new technologies and/or standards/practices
- f) Communications with DOE Project Officer
- g) Guidance as provided by the Department of Energy (DOE) including industry wide initiatives and future program requirements (certifications, health and safety implementation, etc.)
- h) Monitoring visits from the DOE Project Officer, DOE contracted representatives, or the Office of Inspector General
- i) Internal State Audits

#### **4) Overview**

- a) WV WAP supports subrecipients in obtaining required certifications and improving weatherization skills. Training is provided by IREC-accredited Weatherization Training Centers (WTCs) near West Virginia, such as CHP (VA) and COAD (OH). WV WAP does not favor specific vendors but informs subrecipients of available training options and assists in scheduling.
- b) Subrecipients must submit a Training Request Form, which is reviewed for accuracy, cost, and accreditation. Only IREC-accredited providers are approved. Uncertified staff must be supervised to ensure work quality, and subrecipients should implement structured training for new energy auditors, including oversight and file reviews.
- c) In PY 2025 – 2026, WV WAP will continue offering training for certifications and recertifications, prioritizing HEP Energy Auditor (EA) and Quality Control Inspector (QCI) certifications and CEUs based on subrecipient needs.

#### **5) Other Areas of Focus**

- a) In addition to training and certifying EAs and QCIs, WV WAP will prioritize four key areas for subrecipient staff training and credentialing:
  - i) Ensuring subrecipient Electrical Licenses remain current.
  - ii) Providing ongoing guidance on ASHRAE 62.2-2016.
  - iii) Training on updates to the WV WAP Standard Work Specifications (WV WAP SWS), which serve as the state's Weatherization Standards/Field Guide.
  - iv) Maintaining Lead Renovator Certifications and Lead Renovator Refresher Certifications.

#### **6) Certification Descriptions**

##### **a) HEP QCI/HEP EA:**

- i) As of May 1, 2020, all program personnel, including pass-through entities and subrecipients, conducting inspections on completed dwelling units were HEP QCI certified. All eleven (11) subrecipient weatherization providers had at least one HEP QCI-certified staff member, with several having more than one. The WVDED

continues to support the coordination and funding of HEP EA certification and recertification, as outlined in DOE WAP Memorandum 036, released on May 16, 2018. Additionally, during Program Year (PY) 2025–2026, WVDED will provide funding opportunities for pass-through entities and subrecipient staff to maintain their HEP certifications by obtaining Continuing Education Units (CEUs).

**b) Lead Renovator and Lead Renovator Refresher Certifications:**

- i) To become a certified lead renovator, subrecipient staff must complete training through an EPA-accredited provider. These trainings are designed to educate professionals in home renovation and related fields on lead-safe work practices, as outlined in U.S.C. 2681 et seq., 40 CFR 745.80 et seq., and the EPA's 2008 Lead-Based Paint Renovation, Repair, and Painting (RRP) Rule, which was amended in 2010 and 2011.
- ii) Recertification is required every three (3) years for online courses and every five (5) years for in-person training. Currently, the WV WAP mandates that each subrecipient have at least one EPA-certified Lead Renovator on staff. All eleven (11) subrecipients meet this requirement.

**c) Electrician License:**

- i) WVDED will approve the purchase of relevant study materials and online training courses for state mandated electrical licenses. Apprentice, Journeyman, Master and specialty licenses are required to perform certain weatherization tasks. The requirements for each of these levels vary and can be reviewed at <https://firemarshal.wv.gov/Divisions/Fire%20Services/Pages/Electrical-Licensing.aspx>.

**d) HVAC Technician Certification Class 1:**

- i) As of January 1, 2016, all individuals working on heating systems in West Virginia must hold an HVAC Technician License from the West Virginia Commissioner of Labor. Anyone installing, repairing, servicing, or altering HVAC systems for residential structures must be licensed if the project exceeds \$1,000.
- ii) Individuals without the required hours can register as an HVAC Technician in Training (Class 2). Subrecipients must maintain a 1:1 ratio of certified HVAC Technicians to Technicians in Training. Once a Technician in Training meets the required hours—unless still within the opting-out phase—they must pass the HVAC exam to obtain full certification (Class 1).
- iii) HVAC certifications must be renewed annually through the West Virginia Commissioner of Labor. Since September 30, 2016, only properly certified staff may perform HVAC work under WV WAP.
- iv) Certification efforts will continue through PY 2025–2026, ensuring new hires obtain Technician in Training status and eligible trainees advance to full HVAC Technician certification.

**e) Client Education:**

- i) Each subrecipient has identified at least one (1) Energy Educator, though several certifications have expired. Recognizing Client Education as a priority for PY 2025–2026, WVDED is working to recertify Energy Educators through an IREC-accredited WTC online training program.
- ii) This course equips participants with adult education skills to enhance communication between Energy Educators and clients. It covers strategies

for effective client education, from pre-approval to quality assurance, and provides instructional videos and documents for client engagement. Each topic includes a self-quiz with feedback, followed by a final multiple-choice/true-false exam. Certification is granted upon passing the final exam.

- iii) Certified Energy Educators will then work directly with clients to improve energy conservation habits.

**f) ASHRAE 62.22016:**

- i) The WV WAP will seek appropriate resources for providing this training to subrecipients, as well as review monitoring reports to determine which subrecipients may need additional targeted assistance in implementing ASHRAE 62.22016 standards.
- ii) DOE has adopted ASHRAE 62.22016 as its ongoing standard, however, WVDED recognizes the standard has been updated to ASHRAE 62.2.2016. If during the program year DOE mandates the newer standard be implemented, training will be provided to WVDED and subrecipient staff.

**g) Training Timeline for PY 2025-2026**

- i) WVDED will provide training funds through T&TA to the weatherization network during the entire year, utilizing WTCs and other sources. These trainings/certification and renewals are:
  - (1) HEP BPI Quality Control Inspector
  - (2) HEP BPI Energy Auditor
  - (3) HEP BPI Retrofit Installer/Technician
  - (4) HEP BPI Crew Leader
  - (5) Initial Lead Renovator Certification
  - (6) Lead Renovator Refresher Recertification
  - (7) EPA section 608 Training
  - (8) ASHRAE 62.22016
  - (9) NREL/BPI and WV WAP SWS
  - (10) HEP CEUs
  - (11) Healthy Homes Specialist CEUs/Recertification
  - (12) WV WAP data management system App
- ii) Training is available year-round, but benchmarks, assessments, and adjustments are necessary to ensure subrecipients receive required certifications. Training records are maintained in the data management system and supplemented by the Training Event Status Tracking Log. WV WAP staff will actively engage with subrecipients to assess and adjust training needs throughout the year.
- iii) DOE and LIHEAP funds (approved by West Virginia DHHR) will support T&TA costs, covering required and additional trainings Quarterly:
  - (1) First Quarter:
    - (a) HEP BPI Quality Control Inspector Recertification
    - (b) HEP BPI QCI CEUs (CAZ, Duct testing)
    - (c) HEP BPI Energy Auditor Certification/ Recertification
    - (d) HEP EA CEUs (i.e., Building Analyst)
    - (e) WV WAP data management system App
    - (f) ASHRAE 62.22016
    - (g) Lead Renovator Certification

- (h) Lead Renovator Refresher Recertification
- (i) NREL/BPI and WV WAP SWS
- (j) HVAC Technician Class 1
- (k) HVAC Technician in Training Class 2
- (l) WV WAP WAPLink Training
- (2) Second & Third Quarters:
  - (a) Energy Educator
  - (b) Continued training on WV WAP WAPLink Training
  - (c) HEP BPI Energy Auditor Certification/ Recertification
  - (d) New Hire Requirements
  - (e) Retrofit Installer/Technician
  - (f) West Virginia HVAC Electrician License
  - (g) West Virginia Single Family Dwelling Electrician License
  - (h) West Virginia Journeyman's Electrician License
  - (i) West Virginia Apprentice Electrician License
  - (j) Heating Unit Inspection
  - (k) Respirator Fit testing
  - (l) Healthy Homes Specialist CEUs/Recertification
- (3) Forth Quarter
  - (a) Will continue with training and certifications on an as needed, per person/subrecipient basis.

**h) Credentials/Certifications/Licenses**

- i) WVDED Weatherization Specialists must stay proficient in new methods and techniques relevant to WAP while maintaining knowledge of state, national, and industry standards. They receive updates on all state and federal regulations as they are released.
- ii) Currently, two (2) WVDED Weatherization Field Specialists hold HEP QCI and BPI certifications, including Building Analyst and Envelope Professional. A third specialist is expected to obtain the necessary credentials to take the EA and QCI certification exams during the 2025–2026 Program Year.
- iii) Required Certifications:
  - (1) HEP EA Certification
  - (2) HEP QCI Certification
  - (3) Energy (Client) Educator Certification
  - (4) Environmental Protection Agency (EPA) Accredited Lead Renovator Certification (and Recertification as applicable)
  - (5) HVAC Technician Certification
- iv) All weatherization programs must also have a West Virginia Residential Contractors License at the subrecipient level, obtained through the West Virginia Contractors Licensing Board.
- v) The following are additional trainings that each subrecipient should consider throughout the year as needed, several having already been discussed earlier as priorities for PY 2025 – 2026:
  - (1) ASHRAE 62.2 2016
  - (2) Combustion Appliance Zone (CAZ) Training
  - (3) Lead Safe Work Practices Training
  - (4) OSHA Confined Spaces in Construction Standard Course
  - (5) Healthy Homes

- (6) WAPLink Training
- (7) Duct Blaster
- (8) Infrared Camera Training
- (9) Database Management Training
- (10) Utility Program Training
- (11) Administrative/Programmatic/Financial Training
- (12) WV WAP Policy and Procedure Training
- vi) Non-compliance with regards to any mandatory training(s) without the written approval from WVDED due to extenuating circumstances could result in a subrecipient not able to perform certain functions with their staff until the requirements are met.
- i) Weatherization Assistant (WA v.10) Suite**
  - i) WV, in coordination with its data management system vendor, is preparing to transition to WA v.10 using an API connection (WAPLink) to the NEAT and MHEA audit engines, as promised by ORNL.
  - ii) Per DOE Memorandum 074, WVDED has begun training for Grantees and subrecipients to facilitate this transition once API access is available. WVDED will collaborate with DOE, IREC-accredited training centers, and ORNL to coordinate meetings, training, and participation opportunities.
- j) Training Assistance**
  - i) The WV WAP will continue to utilize the traditional approaches of on site program, administrative, fiscal, and in field technical assistance based on monitoring findings and/or needs of the subrecipients. T&TA activities are intended to maintain or increase the efficiency, quality and effectiveness of the WAP at all levels. Activities will be designed to maximize energy savings, minimize production costs, improve program management and crew/contractor “quality of work,” and/or reduce the potential for waste, fraud, abuse and mismanagement.
- k) Passthrough Entity Assessment**
  - i) Training needs are continually assessed, with Field Monitors attending regional and national training events as required. WV WAP staff also receive ongoing training relevant to their roles.
  - ii) Priorities include training new hires and ensuring compliance with new DOE regulations and guidance. Training is then scheduled based on the greatest need, considering the number of subrecipients requiring specific instruction. WVDED also evaluates HEP certifications, determining compliance levels and the potential for additional certifications within available funding.
  - iii) At the end of each DOE or LIHEAP grant cycle, WVDED reviews budgeted vs. actual training expenditures to inform planning for the next cycle, ensuring training needs align with available funds.

**Percent of overall trainings:**

Comprehensive Trainings	70.0%
Specific Trainings	30.0%

#### **Breakdown of T&TA Training Budgets:**

Percent of budget allocated to Auditor/QCI Trainings	34.0%
Percent of budget allocated to Crew/Installer trainings:	54.0%
Percent of budget allocated to Management/Financial trainings	12.0%

## **V.9 Energy Crisis & Disaster Response Plan**

### **V.9.1 Energy Crisis**

#### **a) Energy Crisis Intervention Program (ECIP)**

- i) WV WAP uses LIHEAP WAP funds to operate ECIP, which provides emergency heating assistance during winter for households with non-operable, malfunctioning, or unsafe heating systems.
- ii) All WAP-eligible households qualify for ECIP, but those receiving emergency repairs or replacements must apply for regular WAP services. Emergency assistance is provided within 48 hours, ensuring households have heat. Weatherization services follow by the end of the program year unless the dwelling is deemed ineligible.
- iii) During the LIHEAP Weatherization Application and Award process, subrecipients receive updated ECIP guidance.

#### **b) Disaster Response Plan**

- i) The WV WAP Disaster Response Plan is addressed in Section V.1.2 Approach to Determining Building Eligibility (#7) and is in accordance with DOE WPN 24-1 Disaster Planning and Relief and all applicable Federal regulations