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(08/05) Expiration Date: 02/29/2020

**U.S. Department of Energy**

**WEATHERIZATION ASSISTANCE PROGRAM (WAP)
STATE PLAN/MASTER FILE WORKSHEET**

**(Grant Number: EE0007934, State: NV, Program Year: 2020)**

This worksheet should be completed as specified in Section III of the Weatherization Assistance Program Application Package.

**V.1 Eligibility**

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

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

The State of Nevada (State) Weatherization Assistance Program (WAP) defines an income eligible household for Department of Energy (DOE) funding as a household whose total gross income is at or below 200% of the National Poverty Income Guidelines established by the Office of Management and Budget. For the purposes of the DOE funding this is the definition of low income.

The Nevada Housing Division (NHD) ensures compliance through the use of State's Weatherization Application and Eligibility Determination Worksheet. Each application identifies the applicant's household income and family size necessary for making a determination of income eligibility. Per our Weatherization Administrative Manual, an applicant is required to submit copies of appropriate documents allowing the Sub­grantee the ability to calculate an annual income of all applicable household members.

Describe what household eligibility basis will be used in the Program

The State's DOE funded program eligibility is based on income at or below 200% of the poverty level determined in accordance with criteria established by OMB (above). NHD Weatherization Administrative Manual outlines allowable client eligibility documentation which might include pay stubs, Social

Security benefits letter, and other applicable documentation of income. This manual is reviewed regularly and updated as needed. During the file monitoring, files are reviewed for all required documents. A copy of the Weatherization Administrative Manual is attached to this application.

National Poverty Income Guidelines are distributed annually, and the Eligibility Determination Worksheet is also updated at that time. Sub­grantees utilize an Eligibility Determination Worksheet which gives preference to elderly, disabled and families with children under six years of age. Also, households with a high energy burden are given preference. Where an applicant receives income for a part of the applicable tax year, their partial income may be annualized to determine eligibility. If there is a waiting list and a client is not served promptly, client eligibility documentation is reverified and updated every 12 months. Health and Human Services guidance is used for providing services to Qualified Aliens. Nevada utilizes the National Poverty Income Guidelines and Definition of Income provided by DOE annually which includes annual revisions that are then distributed to the Sub­grantees to use when qualifying clients for the DOE funded portion of the WAP.

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

The State's WAP utilizes guidance provided by Health and Human Services under the Low-Income Home Energy Assistance Program (LIHEAP). The guidance is as follows:

WAP services are provided only to U.S. citizens or qualified aliens.

"Qualified aliens" are defined in section 431 of Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), commonly known as the Welfare Reform Law. The Act covers the larger groups of legal immigrants (legal permanent residents, refugees, asylees, individuals paroled into the U.S. for a period of at least 1 year, individuals whose deportation has been withheld, individuals granted conditional entry, and certain individuals who are victims of domestic abuse). Qualified aliens are eligible to receive assistance and services under the LIHEAP program so long as they meet other LIHEAP program requirements.

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As states set their eligibility requirements for LIHEAP­ funded benefits, they are to ensure that they are in full compliance with Federal provisions related to verification of qualified alien status in providing services. State procedures for verifying U.S. citizenship or immigration status of applicants should be in accordance with the United States Department of Justice's (DOJ) Interim Guidance on Verification of Citizenship, Qualified Alien Status and Eligibility under Title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996, published November 17, 1997 (62 FR 61344). In addition, states should refer to LIHEAP­IM­98­25, dated August 6, 1998, which discusses the DOJ Interim Guidance and its applicability under the LIHEAP program.

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

Procedures to determine that units weatherized have eligibility documentation

**Single family, manufactured housing (mobile homes), and multifamily dwellings are all eligible for weatherization. Proof of ownership is required to be submitted with the application and may be verified through county assessor's records. Applications can be processed from eligible clients for rental properties with owner's authorization. The rental household must meet the income qualification as described above.**

Describe Reweatherization compliance

Dwellings weatherized from September 30, 1994, and earlier, per 10 CFR 6865(c)(2), are eligible for re­weatherization. NHD has established a central database with all records from July 1998 (when NHD took over the program from the Welfare Division) through present day. All clients who request services are checked in the central database to see if they were previously weatherized. If they were weatherized with DOE funds on or after October 1, 1994, they are not eligible to be weatherized with DOE funds. When possible, these clients can be reweatherized with other non­DOE funds. Preference is given to dwellings that have never received WAP services.

Describe what structures are eligible for weatherization

Single Family, manufactured housing and multi­family dwellings are all eligible for weatherization. Non­traditional dwelling units such as shelters and apartment over business, etc. may be weatherized only if program regulations are met. These types of units must be discussed with the NHD staff and approved by the DOE Project Officer prior to weatherization.

NHD does **not** allow for the weatherize of travel trailers nor other non­stationary campers that are registered with the Department of Motor Vehicles because they are not considered permanent stationary housing. Additionally, the use of a post office box for a non­stationary camper or trailer does not make it an eligible structure for weatherization.

A copy of the State Historic Preservation Programmatic Agreement signed on by the Nevada Housing Division's Administrator on 10/29/10 and is attached to the SF­424. A Program Comment was issued by the ACHP on March 11, 2013 pursuant to 36 CFR 800.14(e), published in the Federal Register on March 14, 2013, and extends the duration of the existing 44 Programmatic Agreements – and any future agreements that may be executed under the prototype Programmatic Agreement – until December 31, 2020.

escribe how Rental Units/Multifamily Buildings will be addressed

Building eligibility will be determined by following the final rule published on December 8, 2000, where DOE provided guidance on what types of large multifamily building may be subject to the 50% threshold (65 Fed. Reg. 72210, December 8, 2000). Certain buildings containing rental units may comply with the income eligibility requirements when 50 percent of those dwelling units are eligible dwelling units rather than the established 66 percent identified in the regulations (10 CFR §440.22(b)(2)). The buildings that are subject to the 50 percent threshold are duplexes, four­unit buildings and certain eligible types of large multifamily buildings. For all other multi­family units not less than 66% of the dwelling units must be eligible in order to weatherize the entire building. Benefits in rental units will accrue primarily to the low-income tenants residing in the units.

Rental units may be weatherized, however, a 50% landlord contribution is required for replacement of all capital improvement items such as HVAC equipment, windows and water heaters, unless it is a repair item of less than $2,000. No undue or excessive enhancements are allowed on rental properties. A landlord

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contribution is not required on single family and mobile homes rentals. 10 CFR 440.22 (b)(2) may be used on 2­4 units and 5+ units.

Renters' rights are protected from eviction by having the landlord sign the Landlord Weatherization Service Agreement that states they will not raise the rent due to WAP repairs that may have increased the value of the property. Also, landlords may not evict for other than normal circumstances but not due to the weatherization of the property garnering more rents on the open market. Rental units are protected in accordance with 440.22(b)(3) and renters rights are protected as specified in 440.22(b) 3 and (c)­(e) The Weatherization Service Agreement must be signed by the landlord or management company prior to work beginning.

NHD utilizes a Weatherization Service Agreement and it must be signed by the landlords or property managers prior to work commencing. The Weatherization Service Agreement states that rents cannot be raised due to work being done from weatherization for a minimum one year along with other tenant protections.

Describe the deferral Process

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| Deferrals are required for a variety of reasons such as condition of the structure: building integrity or the ability to effectively weatherize the structure. Also, if the dwelling is slated for redevelopment. If there are Health and Safety conditions that might exist but are able to be remedied by the homeowner, 30 days are given for the homeowner to correct. If 30 days pass and the problem has not been corrected the file is closed and the client may requalify and reapply when they have made the corrections to the property. When there are issues that cannot be corrected or there are unsafe conditions for the contractors’ staff (illegal substance abuse) the dwelling can be permanently deferred. If a property is beyond the scope of weatherization it may also be permanently deferred. If it was necessary to use a licensed contractor to make a determination on the need for a deferral, a fee of up to $500 may be charged by the contractor.When possible, the client is notified of other programs and agencies that might be able to address rehabilitation of the property. When properties are deferred, the client is given a copy of the deferral form notifying them why the property is either temporarily deferred or permanently deferred. The client is asked to sign and acknowledge receipt of the deferral form. A copy of the State's deferral form can be found in the Health & Safety Policy which is attached to the SF 424.. |

**V.1.3 Definition of Children**Definition of children (below age): **6**

**V.1.4 Approach to Tribal Organizations**

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



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

Low income tribal members and other low-income persons are treated equally. NHD does not recommend nor are there sufficient funds to provide DOE weatherization funding directly to members of Native American tribes. Low income members of Native American tribal organizations will receive benefits equivalent to assistance provided to other eligible persons living within the program's service areas. Approximately 4% of Nevada's population is comprised of individuals of Native American descent.

**V.2 Selection of Areas to Be Served**

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| The service areas proposed for the program year are based on the following: the estimated number of eligible households located in each county; the availability of funds to provide assistance to the rural counties, and the availability of qualified service providers. The Weatherization Program’s service area include service to most all areas and counties within the state and revenue streams have been adjusted to assure sufficient funds are available to provide assistance in the rural areas of the state. There are five service areas:Clark County contains 68.5% of the state's eligible population and has been divided into two service areas: |

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1. the City of North Las Vegas and northern rural Clark County 20.5%.
2. the City of Las Vegas, the City of Henderson and southern rural Clark County 48%; and

(3) Washoe County comprises 15.5% of the eligible population and is a separate service area.

1. The eastern rural service area, which is comprised of Esmeralda, Elko, Eureka, Humboldt, Lander, Lincoln, Mineral, Nye, White Pine and Pershing counties contains 8% of the state’s eligible households.
2. The western rural service area, which is comprised of Carson, Churchill, Douglas, Lyon and Storey counties and contains approximately 8% of the eligible population.

The total distribution of Weatherization funding is mostly based on population, except in eastern and western rural service areas. In these areas an additional 2% each was provided to assist with the higher costs of doing business in remote areas of the state.

DOE is one of five funding sources available to the State of Nevada for our Weatherization Assistance Program. The actual awards of DOE funding may not reflect the above percentages because some subgrantees are better suited to expend funds from a particular source. The State's total distribution of funds to the subgrantees in each service area above equals the percentage distribution. However, adjustments may be made to the base on the performance of the Subgrantees.

**V.3 Priorities**

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| Priority is given to the elderly, persons with disabilities, families with children under 6, and high energy burden households. Priority assistance is determined by a point evaluation matrix which awards additional points to residential energy users due to the utilization of heating oil or propane as their primary source of heating. A household that qualifies for and receives Energy Assistance payments from the Division of Welfare and Social Services is defined as a having high energy burden. |

**V.4 Climatic Conditions**

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| Nevada's climate varies dramatically from north to south. Perhaps the clearest indicator of the climatic conditions being addressed by the Weatherization Assistance Program are the number of heating and cooling degree days associated with each area scheduled to receive weatherization assistance. Typically, the northeastern portion of the state has the highest number of heating degree days while Clark County has the highest number of cooling degree days. Listed below are the heating and cooling degree days associated with the various service areas of the state and derived from the period of time from 1961­1990:**\* Average Heating Degree Days (Base 65 F)** **Clark County & Henderson 2,601****Western Service Area & Washoe County 6,022****Eastern Service Area 7,236****\* Average Cooling Degree Days (Base 78 F)** **Clark County & Henderson 3,201****Western Service Area & Washoe County 508** |

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| **Eastern Service Area 320****\*Source: Mechanical Engineering Department University of Nevada – Reno** |

**V.5 Type of Weatherization Work to Be Done
V.5.1 Technical Guides and Materials**

The Nevada Housing Division worked with the Southwest Building Science Training Center (SWBSTC) to update our field guides to align specifications, objectives and desired outcomes outlined in the Standard Work Specifications for Home Energy Upgrades (SWS). The new field guide, aligned with the SWS, has been approved by DOE and went into effect on May 29, 2018. There were no Variance Requests submitted as part of the field guide. It can be accessed at: <https://swbstc.org/resources/nv>­field­guide

The State of Nevada Program Assurances will be updated to include language that all Sub­grantee agreements and vendor contracts, must include language which clearly documents the SWS for work quality as outlined in WPN 15­4, Section 2, for DOE funded projects.

The program’s Sub­grantees are responsible for the installation of DOE approved measures. All work done is consistent with NHD's DOE approved energy audit and materials used are consistent with 10 CFR 440 Appendix A ­ Standards for Weatherization Materials.

Typical Measures include:

1. Insulation: ceiling, floor, side wall and duct.
2. Duct leakage sealing (return, plenum and supply systems).
3. Shell infiltration sealing; i.e., replace broken glass, window and exterior door replacement, door weather­stripping, caulking, and evaporative cooler covers.
4. Insulation of water heater and water heater pipes.
5. Low­flow showerheads.
6. Solar screens.
7. Heating and cooling system repairs and/or replacements.
8. Compact fluorescent light bulbs.
9. Refrigerator replacement. (Standalone freezers, units with water or ice makers are not allowed.)

NHD has received approval for LED bulbs and General Heat Waste items that are not included in Appendix A.

When possible, blower door diagnostics will be performed on each single family and mobile home unit receiving weatherization assistance to ensure compliance with Indoor Air Quality Standards. A blower door duct test will be done in multifamily buildings when changing out HVAC units. In accordance with our Health and Safety Plan, a combustion appliance safety inspection will be performed on each dwelling unit containing a combustion appliance (furnaces, water heaters, ovens, cook tops and gas dryers) when shell sealing will be performed. A final QCI inspection will be performed by the program’s Subgrantees on each home receiving weatherization assistance with DOE funding.

The State of Nevada Program Assurances has been updated to include language requiring the Sub­grantees to pass on these standards in their agreements with contractors and vendors to ensure the work quality outline by NHD is achieved with their performance.

Field guide types approval dates

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| Single­Family: 5/29/2018 Manufactured Housing:Multi­Family: |

**V.5.2 Energy Audit Procedures**

Audit Procedures and Dates Most Recently Approved by DOE

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| Audit Procedure: Single­FamilyAudit Name: WxPRO (North Dakota & Nevada)Approval Date: 7/10/2018 |

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| Audit Procedure: Manufactured HousingAudit Name: WxPRO (North Dakota & Nevada)Approval Date: 7/10/2018 |

Comments

Audit Procedure: Multi­Family
Audit Name: Other (specify)

Nevada falls below the 20% threshold. Multifamily projects are funded with FEAC dollars, and if the situation occurred, a DOE multifamily project would be submitted to our PO for review and approval.

Approval Date:

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| The State of Nevada DOE funded Weatherization Assistance Program falls below the 20% threshold for multifamily units and does not require a DOE approved energy audit and procedures for multifamily buildings. Last program year no units were from a multifamily project of 5 or more units (0%). NHD has other funding sources available for weatherizing multifamily buildings and typically these other sources would be used instead of DOE funds.Nevertheless, if NHD does receive a request from a Sub­grantee to weatherize a multifamily building, the Sub­grantee will be required to conduct a REM Design Energy Audit to ensure that the eligible occupants receive appropriate, cost-effective weatherization services. This will be done on a case ­by case basis. At the time a multifamily project is considered, NHD will submit to our DOE Project Officer the necessary energy audits and any other requested documents to approve the multifamily project prior to commencing weatherization of the multifamily building. |

**V.5.3 Final Inspection**

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| All individuals who perform final inspections and monitoring including Sub­grantee and NHD are required to have staff that is QCI certified or to contract for these services. NHD and at least one of our Sub­grantees, uses a third-party agency for QCI services.NHD provides to all Sub­grantees a copy of relevant policies and procedures that govern the QCI process in accordance with WPN 15­4. Every DOE funded weatherization unit reported as a completed unit receives a final inspection ensuring all work meets the minimum specifications outlined in the SWS in accordance with 10 CFR 440.16(g). Attached is the inspection form and a typical report generated by the NHD's third-party inspector.If through statewide monitoring, a pattern of fails is evident, the responsible agency will receive disciplinary action and the possibility of the reallocation of current funding and the loss of future funding. The severity of the loss depends on the nature and severity of the failures.In Sub­grantee agencies where the energy auditor performs the audit, creates the work order and performs the final quality control inspection NHD performs quality assurance reviews on at least 10% of all completed units. In agencies where the QCI has no prior involvement in the work on the home or the energy audit the NHD third party inspector performs at least 5% review of all completed units. However, the Nevada DOE program in some areas is so minimally funded that it does not allow for a separate energy auditor and inspector. Nevada does its best to serve all areas of the state with some areas only receiving a small portion of funding. Regardless, in practice in prior years, at least 10% of all DOE funded projects are inspected by NHD. Final inspections are performed on 100% of the units weatherized at the Sub­grantee level by a certified QCI person.Specific language regarding QCI inspections on all DOE funded work is contained in the Program Assurances (Sub­grantee agreements) which have been attached to the SF­424. Below is an excerpt from that document."The Subgrantee is to conduct an inspection on each household weatherized no later than three (3) weeks following the work being reported as completed by the Contractor(s) or installer. Subgrantee may not reimburse the Contractor for costs related to any work which has not passed final inspection. All units completed and funded in part or entirely with DOE funding shall be inspected by a Quality Control Inspector (QCI) for its final inspection ensuring that all work meets the minimum specifications outlined in the SWS."Over time with the update of the new database, the energy audit and the final inspection shall all be web based and aligned with SWS ensuring that work is |

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completed in accordance with the work quality requirements outlined in WPN 15­4. Both the NHD and Sub­grantees will be using this coordinated process for inspections and monitoring.

**V.6 Weatherization Analysis of Effectiveness**

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| Effectiveness of Sub­grantee weatherization projects is assessed by adherence to energy audits using a tool approved by the Department of Energy and also by monitoring of completed units done by NHD. NHD sends out monthly quality assurance postcards to clients after weatherization is complete to receive feedback on their experience and interactions with subgrantee staff, contractors and NHD monitors. It provides good insight into program perceptions and expectations and if those expectations were met or how we can improve these interactions.Productivity and energy savings between Sub­grantees are not compared as housing stock is dissimilar in different areas of Nevada and also varying funding which is based on population. Sub­grantee production is compared to projected or expected outcomes that NHD establishes when grant funding is awarded. Benchmarks are established by NHD and evaluated quarterly. If the Sub­grantee is not meeting expected benchmarks NHD meets individually with that Sub­grantee to see how production can be improved and what are the obstacles that may need to be overcome.When a Sub­grantee is not meeting their goals and also during office and field monitoring, NHD assesses what Training and Technical Assistance (T&TA) activities are required. Each year Sub­grantees are queried on T&TA needs. Also, during Sub­grantee meetings, time is devoted to T&TA questions Sub­grantees might have and observations of NHD staff found during field and office visits.Training capability is assessed in the field during monitoring visits. An Inspection Report is completed after each visit and there is an exit interview with Sub­grantee staff discussing any findings/issues and what is being done well. Corrective action is required within 30 days when findings were noted.All Sub­grantee field staff must be BPI certified. Training by NHD is ongoing and takes on formal and also informal training. If a sub­grantee's work is found not to be up to standard they are shown the correct way to install. All work completed in the field is done by licensed contractors who are aware of building and code requirements and must work to those standards. All final inspections and field monitoring will be done by a QCI certified staff member. Work in the field will need to be done to meet the Standard Work Specifications (SWS) adopted by NHD and approved by DOE.Performance reviews are done as stated above with summary reports of finding which must be responded to within 30 days. NHD spot checks any work that did not pass inspection. Work is done at the contractor’s expense.NHD is constantly reviewing our management mechanisms and will affect change when necessary or when problems are observed.Every year a financial review of all subgrantees is undertaken by NHD Audit/Accounting Staff. All subgrantee financial systems and processes are reviewed at that time.During the annual file review NHD conducts a review of the invoiced costs to ensure that no duplicate billing has occurred and that all costs billed are based on the approved costs. Sub­grantees are required to engage in a competitive bidding process at least every five years, with contractor pricing updated annually. See attached Request for Quotation (RFQ) that Sub­grantees are required to use for this process.Subgrantees must be successful in administrating cost-effective programs designed to assist the program’s targeted population. Monitoring reports, financial audits, on–site inspections and client survey reports indicate if subgrantees are administering cost effective programs and are in compliance with state and federal rules and regulations.All Sub­grantees must have available personnel that have received weatherization training including, blower door diagnostics, combustion appliance testing, energy auditing, inspection protocol, and health and safety hazard awareness. All Sub­grantees weatherization staff members need to be certified through the Building Performance Institute’s Building Analyst series. Also, all Sub­grantees must have at least one Quality Control Inspector (QCI) on staff or under contract to meet the DOE program requirements.To secure new program contractors, a Sub­grantee must go through a formal procurement process and pricing is one of several factors that are considered in selecting new contractors to perform weatherization work. Each year contractor pricing is reviewed and compared against competitors. Contractors with the lowest overall price are rewarded with majority of the work of that Sub­grantee. Staff reviews contractors’ costs to see if there are any large increasing in pricing (i.e., over 5% increase) and may question the reason for the price increase. |

**V.7 Health and Safety**

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The Nevada Weatherization Health and Safety (Plan) was updated two years ago using the DOE template and Table of Issues per WPN 17­7 and it is an attachment to this State Plan and Application. Prior year, minor modifications and corrections have been made to the Plan such as increasing the allowable deferral fee from $100 to $500 that contractors may charge for providing necessary technical assistance when making a determination. Also, the Matrix in the Plan for determining the Health and Safety budget and applicable budget percentage has been updated. This is due to the increase frequency for hazard material containment, resulting primarily from drilling holes in walls to determine R-values, the health and safety cost per unit has increased from 15.0% to 18.6%. Lastly, grammar changes have been made to the Plan.

NHD will continue to provide training to our Sub­grantees on the updated Plan. Radon and Radon testing are issues that will need to be addressed in the upcoming program year with our training courses. NHD is currently working to find local trainers to address this need.

The Plan includes:

l Intake procedures (e.g., capturing preexisting occupant health conditions).

l Deferral policies due to Health and Safety reasons (e.g., client notification, list of measures, appeal process, referral of clients to other services).

l An expression of the Health and Safety cost limit as a percent of the average cost per unit.

l Details on training plans for Health and Safety issues including continued training on ASHRAE 62.2­2016.

**V.8 Program Management**

**V.8.1 Overview and Organization**

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| The Weatherization Assistance Program is administered within the Nevada Housing Division (NHD), a division of the state's Department of Business and Industry. NHD utilizes tax-exempt and taxable mortgage revenue bonds to provide a source of mortgage revenue that cannot be supplied by the private sector to low­ and moderate-income households. NHD administers the Single and Multi­Family Bond Programs, Loan Servicing Program, HOME Program and the Low-Income Housing Trust Fund. A copy of NHD's organizational chart is included as an attachment.**Currently there are three (3) fulltime positions funded through the state's Weatherization Assistance Program; a Program Supervisor, a Grants and Projects Analyst II and a Weatherization Compliance Inspector. Our Compliance Inspector participate in BPI's Energy Auditor's Pilot Program but did not receive a certificate since he was not previously QCI certified. NHD currently uses Home Energy Connection, a third-party agency for QCI services.**DOE funding is a small portion of the State of Nevada's Weatherization Assistance Program. NHD's main funding source for weatherization activities is the Universal Energy Charge UEC), a user fee on customer's utility bills. The program is identified as Fund for Energy Assistance and Conservation (FEAC) and it generates approximately three time the amount of funds annually awarded by DOE. NHD also uses funding provided by the Governor's Office of Energy (GOE) and Housing Trust Funds to augment the state's Program. Although NHD does receive some Low­Income Home Energy Assistance Program (LIHEAP) funds, NHD does not directly administer this program. NHD receives a 5% pass through of LIHEAP funds annually from our Department of Health and Human Services. The majority of these funds go towards the Energy Assistance Program. Whenever possible, NHD tries to leverage various funding sources in projects to allow for more measures and added energy savings, choosing the best funding source(s) for each project to maximums benefits.Every year our Sub­grantees are required to respond to NHD's Request for Application for Service Providers (RFA). This process has been used by NHD for many years. The requirements and timeline for submittal are described in the attached RFA. The process commenced on January 31,2020 with the release of the RFA. Responses were due by back to NHD by March 1, 2020. Sub­grantees that continue to perform well in their existing Service Areas are anticipated to be awarded those same Service Areas.NHD has a Weatherization Administrative Manual that is reviewed and updated as necessary. The manual includes overall program managementwhich addresses inventory control, the application process, database operation, management, procurement and other necessary program information. ThisManual is an attachment as well. |

**V.8.2 Administrative Expenditure Limits**

NHD intends to award an additional 5% administrative funds to Sub­grantees receiving $350,000 or less of DOE weatherization funds. This decision is based

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on the high costs associated with the program's administrative, financial management, and operating costs. In recent years, administrative costs have continued to rise. Sub­grantees accept the 10% administrative limit but feel it is becoming more and more difficult to make this program pencil.

NHD utilizes five percent (5%) administration for DOE WAY and currently has only three (3) employees. DOE funding provides a small portion of the State's staff salaries, which is approximately twelve percent (12%) and related fringe benefits. NHD is fortunate to have other funding sources for weatherization to cover the remaining portion of salaries and fringe benefits since Nevada's DOE allocation is relatively small.

**V.8.3 Monitoring Activities**

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| Each Sub­grantee is responsible for administering their program in accordance with the rules and regulations established in 10 CFR, Part 440 and 2 CFR, Part 200, applicable OMB circulars, Weatherization Program Notices and other procedures DOE may require. Monitoring of Sub­grantees encompasses monitoring policy and procedures outlined in WPN 16­4 and are included in our Sub­grantee Administrative Manual, Field Manuals and other related documents.As identified below, NHD monitoring staff are paid from both the Administrative budget and the Training and Technical Assistance budget. Based on the current year DOE allocation of $1,509,219, it is anticipated that eighteen percent (17%) of the Grantee Administrative budget ($12,828) and fifty percent (50%) of the Grantee Training and Technical Assistance budget ($52,823) will be allotted for monitoring activities for Program Year 2020. The Training and Technical Assistance budget contains a cost of $15,000 for a contract for Quality Control Inspector (QCI) services.Presently the NHD staff primarily involved in the monitoring process include the Grants and Projects Analyst II, the Compliance Inspector and the Accountant III. For the current program year, NHD is also using a third-party agency, Home Energy Connection, for Quality Control Inspector (QCI) services. Individual duties are further explained in the subsequent details of the monitoring process below.All Sub­grantees receiving WAP funding are monitored annually and the monitoring encompasses the following:Financial/Administrative/ProcurementEquipment/Inventory/MaterialsEligibilityQuality AssuranceRecords RetentionQualifications and TrainingFeedback and ReportingOnsite InspectionsAssessments, Energy Audits andHealth & Safety**Office and Financial Review:**The Nevada Housing Division (NHD) conducts a comprehensive Office and Financial Review of each Sub­grantee at least once annually utilizing NHD's monitoring document. The visit consists of the following: file reviews of client files, insurance and maintenance records, financial desk review and annual review of financial statements, inspection of tools and equipment, and procurement practices. Any required subsequent visit will include a review of corrective action taken on prior findings. The Grants and Projects Analyst II performs the file review and an Accountant III perform the financial review. (The Accountant III is not under direction of the Weatherization Program Supervisor but instead under is under the direction of NHD's Chief Accountant.)Files are reviewed with regard to income verification/eligibility, completion of all required forms, adherence to priority measures, prioritization of clients (elderly, disabled, children, etc.) and documentation of contractor invoices. Upon completion of the review, an exit interview is conducted with the Sub­grantee's executive director/president or representative and a written report is submitted within thirty (30) days following the review. The written report identifies any findings, required corrective action and deliverables within a specified time frame. NHD works with the Sub­grantee in developing any training or technical assistance designed to correct the identified problems. Failure to comply with the report's recommendations or other corrective actions may result in the withholding of requested funds until resolution has been achieved. A comment card questionnaire is sent to most clients receiving weatherization assistance requesting their opinion on the assistance provided. These questionnaires are reviewed every couple of months by NHD staff and if necessary, forwarded to the respective agency for follow-up. Work detailed above is the responsibility of the Grants and Projects Analyst II.Each Sub­grantee is required to have an agency­wide audit conducted at the close of their fiscal year, however, depending on funding allocation amounts, the DOE program is not always reviewed. Any audit findings regarding the Federally Funded WAP program and |

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corresponding resolutions will be reviewed by the Accountant III and forwarded to the Sub­grantee's president/executive director. The Weatherization Program Supervisor is responsible for overseeing all aspects of the Sub­grantee monitoring process and its successful conclusion.

**Description Of Onsite Monitoring:** A minimum ten percent (10%) field review is conducted that includes; measures installed by the Sub­grantees that are inspected by the Weatherization Compliance Inspector and the third-party QCI consultant to ensure compliance with the specifications outlined in Appendix A of 10 CFR, Part 440 (Standards for Weatherization Materials) and energy audits conducted on a DOE approved energy audit tool. During the course of the monitoring visits, the prices being paid for materials are discussed and comparisons are made with respect to the contracted costs approved by the Sub­grantee at the onset of the program year. The prices paid for a specific item will vary from one Sub­grantee to the other depending on the availability of materials and the distance from the supplier. Pre, during and post work inspections are made by NHD staff over the course of the monitoring visit. These inspections are necessary to ensure the measures recommended by the energy audit, incidental repairs, and applicable Health and Safety standards are in fact being followed. Onsite post inspections compare the measures generate from the energy audit to the completed measures. The energy audit tool determines which measures are most cost effective and ranks them in ascending order. The energy audit tool takes into consideration factors such as type of housing stock, heating/cooling degree days, cost of energy, and installed costs.

For onsite monitoring by NHD and in cases where the Sub­grantee's energy auditor performs the audit, creates the work order, and performs the final QCI, NHD will perform quality assurance reviews on at least ten percent (10%) of all completed units. In the cases where the audit and final inspection are done by the same person NHD's QCI will ensure that the individual performing these tasks is able to consistently perform both tasks. The NHD QCI will evaluate that these processes are performed consistently and correctly or if additional training is required. In the larger Sub­grantee agencies where the duties of energy auditor and final inspector are segregated, NHD may perform a minimum of five percent (5%) inspections but will usually inspect ten percent (10%) of the completed projects. In cases where significant deficiencies are found during the monitoring visit, NHD will increase the number and frequency of these inspections. Field monitoring in the prior and current year have not revealed any significant deficiencies in either quality of work or final inspection processes.

If a Sub­grantee's QCI fails to adequately inspect to the guidelines in the field guide additional training will be provided and a follow up visit will be performed. If the follow up visit still reveals inconsistencies, NHD will require that an independent QCI be hired by the Sub­grantee to do this task or DOE funds will be re­allocated to another Sub­grantee.

NHD monitoring will be performed by the State Compliance Auditor/Inspector who must be QCI certified prior to undertaking any DOE inspections. In the event that he is not QCI certified, NHD will contract with a QCI certified third party. NHD has a fulltime permanent Compliance Auditor/Inspector position but he is not QCI certified. The position is paid out of Training and Technical Assistance budget (please see the attached budget for percentage of salary and fringe benefits). NHD utilizes a Weatherization Inspection Form (WIF) for all final inspections (attached). Presently, the Compliance/Auditor Inspector conducts an exit interview with the third-party inspector (QCI) who provides a formal written summary of field findings. Corrective action on all fails is required with 100% reinspection required by Sub­grantee field staff. From time to time NHD includes reinspection of these fails when out in the course of their regular monitoring. Electronic photo or video evidence may be submitted to verify correction have been made when appropriate. (Please see attached Draft Subgrantee Contract for specific language addressing corrective action procedures.)

For the current program year, field monitoring has been ongoing and includes units in progress and also units completed within the past 60­90 days. As stated above, this year the Weatherization Compliance Inspector is being assisted by a QCI certified third-party agency. Based on our current funding application, 80 units are estimated to be completed this program year. Therefore, a minimum of 10% or 8 units need to be inspected by NHD.

To date (March 4, 2020), a total of four inspections have been completed by our QCI third-party. On September 11, 2019, one project for Nevada Rural Housing Authority­Las Vegas was inspected in Las Vegas. This project required corrections to be made by the contractor. On November 5­6, 2020, three inspections for HELP of Southern Nevada passed inspection with no corrections. One HELP of Southern Nevada projects had failed due to excessive return duct leakage and QCI Inspector is waiting to for confirmation of correction. Due to COVID­19, the corrections cannot be verified as HELP of Southern Nevada is concentrating on emergency services. Verification for correction of failed inspection will be done after Governor's mandate has been lifted. Inspections for Community Service Agency, Rural Nevada Development, and Nevada Rural Housing Authority are anticipated to be conducted between May and June. We anticipate that NHD will exceed the 8 QCI units needed to meet the 10% minimum, with all inspections completed by June 30, 2020.

Through the course of the grant period, each Sub­grantee's financial status reports are continually reviewed to determine the actual program support, material and health & safety costs of the homes being weatherized. These reviews are necessary to ensure compliance with the average cost per unit is not exceeded. Sub­grantee monthly expenditures are reported by budget category and reviewed by the Grants and Projects Analyst II and NHD accounting staff prior to reimbursement. The method of dealing with various problems which may arise between NHD and its Sub­grantees is dependent upon the severity of the problem. Normally, NHD staff will contact the Subgrantee's program manager and discuss the nature of the problem, determine how and by whom the problem will be resolved and in what timeframe. If it is determined the problem could be corrected through more in-depth training or technical assistance, NHD will recommend this course of action and ensure that funds are appropriated to do so. Should the problem remain unresolved, the Weatherization Program Supervisor will

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**contact the Sub­grantee explaining that failure to correct the problem could jeopardize future funding.**

**As of March 4, 2020, Office and File onsite monitoring visits have been completed for Nevada Rural Housing Authority­Las Vegas, and for HELP of Southern Nevada. Community Services Agency was scheduled April 6­10, 2020, although, will be rescheduled after the Governor's mandate has been lifted. Nevada Rural Housing Authority is scheduled for May 11­15, 2020, although, it may be rescheduled to a later date depending upon the status of the Governor's mandate. Lastly, Rural Nevada Development Corporation is scheduled for monitoring June 1­5, 2020. All onsite monitoring visits and related reports are expected to be complete by June/July 30, 2020.**

**As of March 4, 2020, a Financial Review has not been conducted by the Fiscal staff. NHD is working out the details of the reviews to be transferred to the Weatherization Assistance Program, Grants and Projects Analyst II.**

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

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| Comprehensive Trainings (QCI and BPI) will be performed on a regular basis, every three years, by any IREC accredited Weatherization Training Center that is aligned with the NREL Job Task Analysis (JTA) for the position in which the worker is employed. Each Energy Auditor and Inspector is required to obtain their BPI Building Analyst Certification within six (6) months after being hired by NHD or the agency may use another Sub­grantee and receive regular training afterwards. After the initial certificate has been obtain, it shall continue to be renewed prior to its expiration date. Energy Auditors and Inspectors shall test for their QCI when they meet the requirements of testing and continue to renew the certification prior to its expiration date, which is currently three years. Program Weatherization Contractors utilized by Sub­grantees shall maintain qualified employees as determined by each Sub­grantees contract requirements in order for the required tasks to be completed necessary to comply with DOE regulations.Specific Trainings including ASHRAE 62.2­2016, LRRP, OSHA (Asbestos), Health and Safety Plan Updates, Field Guide Updates, Infrared Cameras, Lead and Mold, Radon, Measuring R­ Values, Right Sizing HVAC Systems, and WxPro (Energy Audits) will occur as necessary when identified by the Weatherization Compliance Inspector through monitoring and when new procedures are to be implemented. At minimum, Sub­grantee field staff shall receive Specific Training in each of these area every five years. Sub­grantees are responsible to ensure that their contractors are properly trained in each of these areas and the frequency in which these trainings should occur. Program contractors and their employees are encouraged to participate in any Specific Trainings when offered by NHD to our Sub­grantees.NHD and its Sub­grantees do not have an agreement with any specific training center but the following training centers and Energy Professional Consultants are anticipated to be used:l Southwest Building Science Training Center, Arizonal Opportunity Council, Washington Statel American Institute of Building Science, Genoa, Nevadal Home Energy Connection, Las Vegas Nevada(Other training centers and programs may also be used based on need.)In Program Year 2020, Training and Technical Training (T&TA) activities/funding will be used to support the Weatherization Compliance Inspector position at NHD and all Sub­grantees with both Comprehensive and Specific Training needs. Sub­grantees may use T&T/A funding to train contractor's employees for both Comprehensive and Specific Trainings. IT funds are to be used for this purpose there should be in place an agreement to maintain the employee's services for a minimum of one year after the training has been completed pursuant to WPN 10­1.In Program Year 2020, the Weatherization Compliance Inspector may use T&TA funds to obtain and/or renew his BPI certification(s). His Building Analyst Professional certification will expire on April 27, 2020. Depending on the BPI testing process, he will either renew his Building Analyst Professional certification or try to obtain his Energy Auditor certification as he was a participant in the BPI Pilot Program. He may also test for his QCI certification or micro­certification as may be applicable. (In the meantime, NHD is using the services of a third-party consultant for QCI compliance.)NHD will allocated funds to send one NHD staff member to Home Performance Coalition Annual Conference. One or two NHD staff members may also attend other technical trainings such as use of infrared technology. The remaining T&TA funds will be used for other training and travel costs as may be needed.NHD will assess any ongoing T&TA needs of Sub­grantees based upon the findings related to federal and state program reviews, monitoring reports, monthly status reports, client satisfaction questionnaires, and financial and compliance audits. NHD monitoring is designed to maximize energy savings through the correct implementation and usage of the DOE approved energy audit tool for signal family dwellings and manufactured housing. T&TA funds will be provided to correct noted deficiencies and to improve the overall effectiveness of the Sub­grantees performance. As indicated earlier, T&TA activities will be limited by the amount of available funds. All Sub­grantees provide 100% final inspection on all weatherized dwelling units. All Sub­grantees provide 100% reinspection |

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on any failed units. Training needs are access from these inspections as well.
**Quality Control Inspections:**

NHD requires at least one field staff member of each Sub­grantee maintain BPI and QCI certifications. As stated elsewhere in this plan all DOE project completions must be inspected by a QCI certified inspector. Nevada will have four Sub­grantees and one Weatherization Compliance

Inspector. NHD requires a minimum of one QCI certified employee per Sub­grantee and one for the State which is adequate coverage to complete all inspections. In the event that a Sub­grantee does not have a QCI certified inspector, coverage will be provided by one of the other Sub­grantee QCI certified staff. Three out of four Sub­grantees have at least one certified QCI staff member. Rural Nevada Development Corporation is in the process of having their contract inspector QCI certified but will continue to use the QCI inspector from another Sub­grantee until he passes his QCI tests. Currently, NHD is using a third-party agency for QCI services and will continue to do so until the Weatherization Compliance Inspector obtains his QCI certificate.

**Needed CEU for Certifications:**

When Sub­grantee staff 's BPI certifications are coming up for renewal CEU's are obtained from ongoing training opportunities. This year CEU's are available at the Home Energy Performance Conference will be virtual on­line beginning April 27, 2020 due to COVID­ 19. This was budgeted in the current budget cycle. Many of our Subgrantee's sent their staff members to last year's conference although the cost was extremely high for food and lodging. Weatherization conference sessions are considered Specific Training per WAP Memorandum 061.

NHD's Grants and Projects Analyst II maintains a training log and is aware when certifications are up for renewal. NHD requires mandatory BPI and Health and Safety trainings for all Energy Auditors and Inspectors which enables the Weatherization Compliance Inspector to assess competency in the following disciplines: QCI, Blower Door, Combustion Appliance Safety, ASHRAE 62.2­2016, Lead Safe Weatherization, Mold Awareness and other Health and Safety program requirements. BPI and Health and Safety trainings are mandatory for new Sub­grantee and contractor staff within 6 months of hire. Prior to receiving training, the new hire is unable to work on a job without working with a senior staff person who has taken the required classes. NHD verifies that all required trainings have been completed and certifications are up to date during our annual Office Review. NHD request to see copies of all licensing and certifications.

The EPA Lead Renovator training is contracted out and certification is required for all subgrantee staff. Contractors are required to have Firm Status prior to working on any pre 1978 housing stock. Additionally, contractor staff must receive renovator certification within 90 days of hire and cannot work on pre'78 housing stock until certification is received. All four (4) Sub­grantees and their contractors have received the Lead Renovator training and have certifications. All Contractors working on the program have Firm Status as required by the EPA. During the office reviews all required certifications and licensing are reviewed and are current.

The quality of field work is evaluated during each monitoring visit to ensure compliance with the SWS, Field Manual and all Policy and Procedures. NHD also reviews feedback from DOE monitoring, internal state reviews, QA visits and incorporates any feedback received.

NHD also has available a weatherization field guide and administrative manual for Sub­grantees and their contractors. The Sub­grantees are notified of these documents under the program assurances of the State contract issued each year. Each time the administrative manual is updated, the updated sections are sent directly to the Sub­grantees. The weatherization field guide was prepared by Southwest Building Science Training Center and is available at the following link: <http://swbstc.org/resources/nv>­field­guide

**Client Education:**

Sub­grantees distribute the following printed materials to clients consistent with the Health and Safety Plan and NHD directives:

l A Brief Guide to Mold, Moisture and Your Home – EPA

l A Citizen's Guide to Radon ­ EPA

l Asbestos in the Home, A Homeowner's Guide

l Renovate Right ­ (Lead Safe Work Practices)

Upon the completion of every weatherization project a walk through is performed by the Sub­grantee inspector with the client prior to signing off the work completed in the home. This provides an opportunity to explain the proper operation and maintenance of the measures installed, warranty information and additional ways the client can save energy. All clients are provided with a copy of "Your Home Energy Savers Booklet". The inspector is also responsible for ensuring any building and/or mechanical permits have passed final inspection by the agency of jurisdiction. A project is not considered complete unless it has passed all inspections both required by the weatherization program and outside agencies governing construction work.

Programmatic and Administrative training takes place annually by the Grants and Projects Analyst II and in most cases is done at the offices of the Sub­grantee in conjunction with the annual monitoring. All Sub­grantees have staff members that have been involved in the program for several years but still received update trainings.

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Financial reviews are conducted annually and also the Financial Status Reports submitted monthly are reviewed by NHD accounting staff. Sub­grantees must conform to the Uniform Administration Requirements (2 CFR Part 200) and General Accepted Accounting Principles. Subgrantee Financial Audits are reviewed annually by the Accountant III. Sub­grantee fiscal staff are encouraged to obtain training on the Uniform Administrative Requirements at weatherization conferences and through other training providers.

Percent of overall trainings

Comprehensive Trainings: 50.0 Specific Trainings: 50.0

Breakdown of T&TA training budget

Percent of budget allocated to Auditor/QCI trainings: 90.0 Percent of budget allocated to Crew/Installer trainings: 0.0 Percent of budget allocated to Management/Financial trainings: 10.0

**V.9 Energy Crisis and Disaster Plan**

The State of Nevada does not intend to use DOE funds for Energy Crisis Relief.

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