

Kentucky Housing Corporation

Weatherization Public Guidance

January 9, 2023

KHC Program Notice 01-2023

1. **Subject:** Incidental Repair Measures (IRMs)

Guidance: *Incidental repair measures (IRMs) have a cap limit of \$500 per measure regardless of funding source used.* IRMs must be installed as a protective measure of an ECM measure (whenever possible), in which weatherization (WX) funds were used for the energy retrofit installation. (For example, subgrantee makes a small roof repair to protect attic insulation installed by WX funding or installs gutters to protect the attic, wall, or floor insulation installed with WX funding.) IRMs can be entered in as Health and Safety (H&S) when not able to be tied to an ECM and is part of a H&S measure, but the repairs still have a cap of \$500 per H&S measure.

If a repair is estimated to cost more than \$500 and can be considered a reason for deferral, the job should be deferred, and a Weatherization Ready form should be submitted to Kentucky Housing Corporation for approval.

According to PN 01-2018, IRMs should be entered into the audit per energy conservation measure (ECM) and achieve a score of at least a 1.0 with Department of Energy funding and .6 with LIHEAP funding. To enter an IRM into the auditing software when tied to an ECM:

1. Enter Materials and Labor into the ECM that the IRM is being installed to protect.
2. Label Materials and Labor as IRM materials and IRM labor. IRM materials and labor must not exceed \$500 per ECM and SIR must remain 1.0 or above when using DOE funds and 0.6 or above when using LIHEAP funds.

Ground cover does not fall into the category of IRMs because it is part of the H&S plan. KHC's H&S plan sets the cap for the IRMs. See the exert below.

Exert from KHC's H&S Plan

4.0 – INCIDENTAL REPAIR MEASURES
<i>If Grantees choose to identify any H&S measures as incidental repair measures (IRMs), they must be implemented as such under the Grantee's weatherization program in all cases – meaning, they can never be applied to the H&S budget category. In order to be considered IRMs, the measure must fit the following definition and be cost justified along with the associated efficiency measure;</i>
<i>Incidental Repairs means those repairs necessary for the effective performance or preservation of weatherization materials. Such repairs include, but are not limited to, framing or repairing windows and doors which could not otherwise be caulked or weather-stripped and providing protective materials, such as paint, used to seal materials installed under this program. (10 CFR 440 "Definitions")</i>
Minor repairs are repairs costing less than \$500. Building rehabilitation is beyond the scope of the WAP. H&S funds should not be used when the repair is a component of an ECM. In that case, the repair should be cost-justified as an incidental repair. Repairing a small roof leak will be charged to Health and Safety when no attic insulation is installed but will be charged to Incidental Repair Measures when attic insulation is installed. H&S funds should not be used when the repair is a component of an ECM, such as fixing a light fixture to install a CFL/LED bulb. In this case the cost should be cost-justified as an incidental repair. Correction of combustion gases venting issues should be completed as an incidental repair when it is a component of an ECM. The removal and replacement of knob and tube requires electrical license and is allowed as an incidental repair to an ECM such as installing insulation.

Difference in IRMs and Ancillary Repairs

IRMs are larger repairs that are necessary to protect the ECM. Ancillary items (costs) are small and are necessary for the installation of an ECM, such as sealant, paint, fasteners, screws, or nails. For more guidance on IRMs and ancillary items, please review [WPN 19-5](#). See attachment A for examples of ancillary costs versus IRMs from WPN 12-09, which will help illustrate the differences in the two types of repairs.

KHC recommends, in cases where subgrantees are not sure if the repairs are IRMS, ancillary costs, or reasons for deferral, subgrantees contact their technical monitor.

2. **Subject:** DOE Mandated Manufacturer's Equipment Performance Ratings Requirements

Guidance: Effective January 1, 2023, the Department of Energy (DOE) is requiring all HVAC manufacturers to meet new national minimum efficiency levels. The new national minimum efficiency levels require HVAC equipment to meet the new SEER2 and HSPF2 rating systems for air conditioning and heat pump systems. To assist our partners, KHC is putting out the following table of efficiency ratings for equipment.

	Previous SEER Minimum	New SEER2 Minimum	Previous HSPF Minimum	New HSPF2 Minimum
Ducted Split Heat Pump Systems	14 SEER	14.3 SEER2 (15 SEER)	8.2 HSPF	7.5 HSPF2 (8.8 HSPF)
Ducted Packaged Heat Pump Systems	14 SEER	13.4 SEER2 (14 SEER)	8 HSPF	6.7 HSPF2 (8 HSPF)
Ductless Heat Pump Systems	14 SEER	14.3 SEER2 (15 SEER)	8.2 HSPF	7.5 HSPF2 (8.8 HSPF)
Air Conditioning Only Split Systems	14 SEER	14.3 SEER2 (15 SEER)	N/A	N/A

By January 1, 2023, all heat pumps will be subject to new national minimum efficiency levels. However, Existing 14.0 SEER heat pumps built prior to January 1, 2023, may still be sold and installed on or after January 1, 2023, in all regions. Please retain documentation for your files to demonstrate the date the heat pump was manufactured.

KHC PN Guidance Distributed By:	
TECHNICAL:	ADMINISTRATIVE:
Mark Adams Manager – REE 800-633-8896 or 502-564-7630, Ext. 487 madams@kyhousing.org	Keli Reynolds Manager – Single Family & HCA Support 800-633-8896 or 502-564-7630, Ext. 414 kreynolds@kyhousing.org

Attachment A
Examples from WPN 12-09

Examples:

Energy Conservation Measure (ECM)	Ancillary Items (Cost must be included in SIR for associated individual ECM)	Incidental Repair Measure (IRM) (Cost must be included in SIR for whole unit package of ECM)	Health and Safety Measure (Separate cost justification. Not included in SIR)
Attic insulation	Eave baffles, hatch dam, dams for heat producing devices	Attic vents. Minor roof repair to preserve insulation. (if identified as IRM in Grantee Plan)	Minor repair of leaking roof that may create moisture/mold issue in attic insulation. (if identified as H/S measure in Grantee Plan)
Wall insulation	Sealing high and low openings in balloon framing	Sealing unusual openings as in void areas between double ceilings. Minor roof repair to preserve insulation. (if identified as IRM in Grantee Plan)	Minor repair of leaking roof that may create moisture/mold issue in new wall insulation.(if identified as H/S measure in Grantee Plan)
Air sealing	Fasteners for patches	Unusually large (defined by Grantee), such as more than 1 sheet of sheetrock, patching materials and labor	
Attic hatch – (a required part of the larger air sealing	Items to complete proper construction such	Demolition and/or framing for a new hatch, new ceiling	

ECM, sealing the access opening with a rigid lid and weatherstripping)	as: hold down clasps, handles, caulk for ceiling-to hatch frame seal, insulation	trim and stop	
Crawl space or knee wall access door (a required part of the larger air sealing ECM, sealing the access opening with a rigid door and weatherstripping)	Hinges, latches, insulation	Demolition of deteriorated existing frame, new framing, new trim and stop	
Caulking, weatherstripping existing windows (done as a part of the larger air sealing ECM)	Backer rod, cleaning off old caulk	Primer or sealer, replacing deteriorated framing, other prep repair	
Vinyl replacement windows for double hung sashes	Fasteners, interior and exterior caulk materials & labor	Replace broken stops, replace or repair rotted jambs and wall framing	
Replacement or repair of heating/cooling systems	All typical accessories for proper installation	Flue repair, providing combustion air from outside the CAZ as needed	All, including flue repair and combustion air from outside CAZ as needed, if the system is inoperable, per Grantee H&S plan
Heating/cooling system replacement	Include all associated costs within replacement cost	Construction of separate CAZ per code requirement	Include all associated costs if SIR disqualifies as ECM, per Grantee H&S plan
CFL		Replace hazardous light socket or fixture. (if identified as IRM in Grantee Plan)	Replace hazardous light socket or fixture. (if identified as H/S measure in Grantee Plan)