**Kentucky Housing Corporation**

**Weatherization Assistance Program (WAP) Guidance**

**April 15, 2016**

**KHC Program Notice 01-2016**

1. **Subject:** Quality Control Inspection (QCI)

**Guidance:** This is a reminder of our State Plan’s requirement for QCI certified final inspection staff. Every DOE funded WAP unit must receive a final inspection ensuring that all work meets the minimum specifications outlined in the State Plan, Kentucky Weatherization program manual and the Kentucky Weatherization Field Guide and Standard Work Specifications in accordance with 10 CFR 440.

Section 5.1(4) of the Kentucky Weatherization Program Manual, Revision 10/8/2014, pg. 47 states, “A trained, qualified, and BPI Certified Quality Control inspector shall conduct inspections. (BPI QCI Certification is required effective July 1, 2015.” Therefore only final inspections performed by a certified Quality Control Inspector (QCI) are eligible for reimbursement. QCI competency is demonstrated by certification as a Building Performance Institute (BPI) Home Energy Professional (HEP) QCI. Training for this certification is available through the Residential Energy Efficiency, training initiatives center, in Frankfort.

Agencies should use every method possible to avoid failed final inspections. Some strategies are;

* Use experienced contractors who fully understand the quality of work to be delivered and the Standard Work Specifications referenced in the Kentucky Weatherization Field Guide.
* Thorough, detailed work write ups.
* Pre-construction phone call to review work expectations.
* Post construction, final inspection scheduling phone call which includes a review of completeness expectations.
* Contractor and agency representation at the time of inspection to make corrections in order to avoid a re-inspection trip. Additional time necessary for the QCI to wait for corrections in order to avoid another inspection must not be charged to the program.
* The agency must understand that the obligations of the construction contractor and QCI (possible contractor) are to the agency and not each other unless contractually noted. The QCI will report deficiencies to the agency representative. It will be the agency’s responsibility to work with the contractor to correct any deficiencies.
* Care should be taken to not involve the home owner when asking for corrections to protect the integrity of the contractor.
1. **Subject:** Final Inspection of DOE Funded Unit (any amount of DOE funds)

**Guidance:** The final inspection procedures must;

* Comply with the technical standards set forth by BPI for QCI final inspection criteria and the standards set forth by Kentucky Weatherization Program Manual.
* Be completed by a BPI, Quality Control Inspector (QCI) certified staff only.
* Include inspection of all installed measures and testing of heat systems during one final inspection after all work has been completed.
* **The final inspection must be completed by a QCI certified individual who has not performed any work other than the initial audit. At no time can QCI staff inspect work they have performed, even if that work was inspected by another QCI staff at a previous time, such as health and safety test out.**
1. **Subject:** Failed and Marginally Passed Final QCI Inspections.

**Guidance:** When a final inspection fails, due to a Health and Safety measure not being corrected while the inspector is present, another physical inspection is required after the deficiency is corrected.

If emailed photo documentation, and/or review of written documentation, of an energy conservation measure correction, is enough to satisfy the QCI, another onsite inspection is not necessary. These types of after-inspection documentation reviews must be thoroughly documented and are ultimately the judgement of the inspecting QCI. This does not relieve the QCI of the obligation to ensure the quality of work meets the Standard Work Specifications. The QCI has the opportunity, and is encouraged, to recommend training on the QCI Inspection Form for any field staff installing measures inadequately.

1. **Subject:** Duct Blaster Use & New QCI Inspection Form

**Guidance:** When performing a heat system inspection on any system with ducted airflow, a duct blaster must be used. Initial and final leakage measurements must be recorded. Effective May 1, 2016 for QCI certified staff performing evaluations or final inspections the Jan 2016 version of the, Kentucky WAP QCI Final Inspection Checklist form (attached) must be filled out and signed by the appropriate inspector.

A certified QCI staff person has been tested on the use of the duct blaster. Training can be made available to other evaluation staff upon request to the Residential Energy Efficiency training center. Contact Deanna McCord dmccord@kyhousing.org 502-564-7630 ext. 344

1. **Subject:** Lead Safe Work practices vs RRP

**Guidance:** DOE’s LSW is more stringent than RRP because WX workers must always construct/provide some level of containment to comply with LSW.

Level 1 Containment “is required in pre-1978 homes when less than 6 sq. ft. of interior painted surface per room or 20 sq. ft. of exterior painted surface will be disturbed.  Measures that may fall within this guideline include:  Installing or replacing a thermostat  Drilling and patching test holes  Replacing HEPA filters and cleaning HEPA vacuums  Changing Furnace Filter  Removing caulk or window putty (interior)  Removing caulk or window putty (exterior)  Removing weather-stripping.”  Other examples are: Installing an ASHRAE exhaust fan and/or installing/providing attic access.

Additionally and to be in full compliance with LSW, all LSW documentation must be in the client file for “pre-1978 job sites” (see WPN 08-6 and the attachments thereto): “States must document in their files LSW was properly implemented (e.g., photos of the site, containment set up, etc.)”…”Certified Renovator will verify the job site was “secure.” Verification documents must be placed in the client files,…”

Level 2 containment is required when Weatherization activities will disturb more than 6 sq.ft. of interior surface per room or 20 sq. ft. of exterior surfaces in homes built prior to 1978.

Also visit:

WPN 02-6 on WAPTAC: <http://www.waptac.org/data/files/website_docs/government/guidance/2002/wpn%2002-6.pdf>

WPN 08-6 on WAPTAC: <http://www.waptac.org/data/files/website_docs/government/guidance/2008/wpn%2008-6%20guidance%20and%20attachments.pdf>

WPN 09-6 on WAPTAC: <http://www.waptac.org/data/files/website_docs/government/guidance/2009/wpn%2009-6%20final%20guidance%20document.pdf>

1. **Subject:** Lead Safe Work 8 hour course vs 4 hour online course.

**Guidance:** DOE has approved a 4 hour online LSW course as an allowable substitute for the Kentucky WAP requirement of an 8 hour classroom course. We hope to have this course available on the Residential Energy Efficiency website soon however it is available immediately on the CHP Energy Solutions website here <https://www.communityhousingpartners.org/1856/12/lead-safe-weatherization.html> This course is eligible to be paid with T&TA funds for contractor and in house staff.

1. **Subject:** AverageWx Costs Calculations

**Guidance:** The formula for calculating Average Wx Costs in KY Green will no longer be all inclusive of all reimbursable and non-reimbursable funding sources (DOE, LIHEAP and DSM); *((DOE & LIHEAP WX Materials, DOE & LIHEAP WX Program Support, DOE & LIHEAP WX Labor, Donated Labor (from all jobs that year), and DOE VE)/ # completed units for the year)*. Effective Monday, April 18, 2016, Average Wx Costs calculations will be broken down as follows:

**DOE (Reimbursable)**

*((DOE Wx Materials + DOE Wx Program Support + DOE Labor + DOE VE + DOE WX Materials Purchased and Warehoused for Month)/# all DOE and LIHEAP-funded completed units.*

**LIHEAP (Reimbursable)**

*((LIHEAP Materials + LIHEAP Wx Program Support + LIHEAP Labor + LIHEAP WX Materials Purchased and Warehoused for Month)/# LIHEAP completed units.*

**Total Funding (Reimbursable and Non-Reimbursable)**

*((DOE and LIHEAP Materials +DOE and LIHEAP Wx Program Support + DOE and LIHEAP Labor + DOE and LIHEAP VE+ DOE and LIHEAP WX Materials Purchased and Warehoused for Month + DSM Material + DSM Labor)/# completed units.*

1. **Subject:** Records Retention and Disposition Schedule.

**Guidance:** WAP documents must be retained and properly disposed of in 5 years following the expiration of that Program Year Grant Agreement (e.g. PY2015-2016 documents can be disposed of at the expiration of PY19-20 Grant Agreement).

Documentation may include but not limited to: application and prioritization for Weatherization, income verification, proof of ownership, agency/landlord agreement, work order, completion report, completed dwelling report, energy systems check list, agency contractor agreement, contractor notice of completion, change order, private contractor invoice, EPA verification statements regarding lead and mold hazards, baseload checklist, health and safety client screening questionnaire, weatherization contractor application, weatherization contractor work reference, and other such records deemed necessary by U.S. Department of Energy.

1. **Subject:** Maximum allowable labor hours related to weatherization job auditing and inspection. This supersedes KHC program notice 03-2013, Subject 2.

**Guidance:** Due to the additional QCI requirements of the Final Post inspection, effective as of the date of this notice, the maximum amount of hours allowed to be charged for the activities described in the chart below are as follows:

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| Onsite client education during the evaluation process. | 1 hour |
| Onsite house evaluation (this does not include client education time). | 5 hours |
| Office time preparing audit, work write up, file documentation and bid docs. | 3 hours |
| H&S Post inspection for heat system work. | 1 hour |
| H&S Post inspection for heat system work involving gas and oil appliances. | 2 hours |
| Final Post inspection. | 4.5 hours |
| Call back inspection due to failing at final or heat system post. | 1 hour |

While these times are maximums, it is expected that an agency’s average time for these activities will be less, with the exception of client education. These times do not include travel time. However travel time will be evaluated for reasonableness.

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