

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
STATE PLAN/MASTER FILE WORKSHEET

(Grant Number: EE0007921, State: KY, Program Year: 2019)

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

For a dwelling unit to be eligible for weatherization assistance, it must be occupied by a client/family who must meet one of the following criteria:

1. Total annualized income of the client/family residing in the dwelling to be weatherized is at or below 200% of the poverty level determined in accordance with the most current criteria established by the Director of the United States Office of Management and Budget; or
2. The family unit has a member who has received cash assistance payments under Temporary Assistance for Needy Families (TANF) or Kentucky Transitional Assistance Program (K-TAP) sometime during the 12-month period prior to eligibility determination; or
3. The applicant's household contains a member who has received cash payments under Title XVI of the Social Security Act during the twelve (12) months preceding the determination of eligibility, the applicant will be categorically eligible; or
4. The applicant household has been verified as eligible for LIHEAP bill payment assistance within the preceding 12 months.

To be eligible for weatherization assistance, an applicant must fill out an Application and Prioritization for Weatherization Services, provide required documentation of income and home ownership, reside in the home to be weatherized, and meet the WAP income eligibility criteria in #1-4 above. Program Notices from DOE will indicate an effective date of any revised poverty guidelines. The application and supporting documentation will be reviewed and verified by the program coordinator.

An applicant will remain eligible for weatherization services for 12 months from the date of verified eligibility. If 12 months have passed from the date of verified eligibility, and no weatherization work has begun, the household must show continued eligibility. Weatherization work begins on the date a complete audit is performed.

When considering earned income from salaries and wages, all pay periods must be accounted for in the period used to establish eligibility.

Examples:

Fifty-two pay periods per year, if paid weekly, 26 pay periods per year if paid every 2 weeks, and 24 pay periods if paid twice per month. Average income reported by current members of the household will be considered. If using an annualized calculation at least 6 weeks of income must be considered.

Application intake workers must carefully determine which Title the social security is awarded under before determining eligibility.

For households that contain a member who received cash assistance payments under Title IV or XVI of the Social Security Act, which is more commonly known in Kentucky as Kentucky Transitional Assistance Program (K-TAP), funded through the federal Transitional Assistance for Needy Families (TANF) and Supplemental Security Income (SSI), they automatically qualify for weatherization assistance. Subgrantee will not need to do any further income verifications once K-TAP and / or SSI are confirmed as a source of income in the household.

Note: SSI is different than Social Security Disability Insurance (SSDI), defined by Title II of the Social Security Act. Receiving SSDI will not automatically qualify a household.

If the applicant household contains a member who has received cash payments under Title XVI (SSI) of the Social Security Act or KTAP at any time during the twelve (12) month period preceding the determination of eligibility, the applicant is categorically eligible. This does not mean that if the client is earning disability social security income that they are to receive assistance automatically. These individuals may have disability income plus other income that exceeds income limits, thereby removing their eligibility. The ruling means that if the client has received Title IV or Title XVI assistance (welfare assistance), they are already disabled but very low-income.

In households consisting of eligible and ineligible household members, the income of all household members (eligible and ineligible) will be counted when determining eligibility.

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INCOME - 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 in Section B.

A. CASH RECEIPTS:

Cash Receipts include the following: 1. money, wages and salaries before any deductions; 2. net receipts from non-farm 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

B. INCOME EXCLUSIONS: 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. one-time 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. non-cash 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 non-farm 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; and 16. Child Support, as defined in the most recently issued DOE guidance on POVERTY INCOME GUIDELINES AND DEFINITION OF INCOME. 17. Reverse mortgages; 18. Payments for care of Foster Children;

Describe what household eligibility basis will be used in the Program

The 200% of the poverty level basis is determined in accordance with criteria established by the Director of the United States Office of Management and Budget.

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

When an applicant declares themselves an alien, and qualified to apply for WAP, agencies must submit the documentation provided by the applicant to KHC to verify their "Qualified Alien" status. KHC will utilize the SAVE database for verification and provide written approval back to the agency. Agencies must have a copy of this approval in the client file. Reimbursement for any service, evaluation, or work is not allowed without written confirmation that verification has been successfully completed by KHC.

QUALIFIED ALIEN- For purposes of the WAP, the term 'qualified alien' means an alien who, at the time the alien applies for, receives, or attempts to receive a Federal public benefit, is--

- (1) an alien who is lawfully admitted for permanent residence under the Immigration and Nationality Act,
- (2) an alien who is granted asylum under section 208 of such Act,
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 - (3) a refugee who is admitted to the United States under section 207 of such Act,
 - (4) an alien who is paroled into the United States under section 212(d)(5) of such Act for a period of at least 1 year,
 - (5) an alien whose deportation is being withheld under section 243(h) of such Act, or
 - (6) an alien who is granted conditional entry pursuant to section 203(a)(7) of such Act as in effect prior to April 1, 1980.
- (7) battered alien spouses, battered alien children, the alien parents of battered children, and alien children of battered parents who fit certain criteria.
- (8) Cuban/Haitian entrants.

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Some common verifiable forms
I-327 (Reentry Permit)
I-551 (Permanent Resident Card)
I-571 (Refugee Travel Document)
I-766 (Employment Authorization Card)
Certificate of Citizenship
Naturalization Certificate
Machine Readable Immigrant Visa (with Temporary I-551 Language)
Temporary I-551 Stamp (on passport or I-94)
I-94 (Arrival/Departure Record)
I-94 (Arrival/Departure Record) in Unexpired Foreign Passport
Unexpired Foreign Passport
I-20 (Certificate of Eligibility for Nonimmigrant (F-1) Student Status)
DS2019 (Certificate of Eligibility for Exchange Visitor (J-1) Status)

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

No dwelling will be weatherized until it is determined that the dwelling occupants are income eligible. Applicant income levels will be verified and documented through the use of the most recent check stubs or Social Security checks or statements, LIHEAP application, Department for Community Based Services' Kentucky Transitional Assistance Program (K-TAP), food stamp program or other similar programs. Categorical eligibility will be verified and documented through the use of SSI award letters and copies of SSI checks. These records will be obtained by the intake worker during the application process.

After an applicant has been determined eligible for assistance, the Weatherization Coordinator or the Executive Director must sign the application (electronic signatures are acceptable) certifying the eligibility prior to any work being done to the dwelling.

Income Verification for Shelters

A statement from the shelter management or owner that identifies the target population served and entrance criteria will serve as income verification for shelters. The entrance criteria must serve a population at or below 200 percent of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget. Each 800 square feet or each floor of the shelter will count as one dwelling unit.

Describe Reweathering compliance

The term "Re-weatherization" applies only to those units which fall into the categories below and described under 10 CFR 440.18(e)(2)(iii)

Re-weatherization Eligibility Criteria: Service providers will not be allowed to use contract funds to install Weatherization materials or provide other Weatherization services to a dwelling previously served with contract funds unless one of the following conditions exist:

1. The dwelling unit has been damaged by fire, flood, or other Act of God and repair of the damage to Weatherization material is not covered by insurance.
2. Dwelling units weatherized (including dwelling units partially weatherized) under this part, or under other Federal programs (in this paragraph referred to as 'previous weatherization'), may not receive further financial assistance for weatherization under this part until the date that is 15 years after the date such previous weatherization was completed. This paragraph does not preclude dwelling units that have received previous weatherization from receiving assistance and services (including the provision of information and education to assist with energy management and evaluation of the effectiveness of installed weatherization materials) other than weatherization under this part or under other Federal programs, or from receiving non-Federal assistance for weatherization.

Written permission from KHC must be received prior to any re-weatherization of units meeting condition 1.0 above.

Sub-grantees will check previous client lists (i.e. agency lists, Castinet, or other databases) to determine if units have been previously weatherized. In some

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instances, re-weatherization cannot be determined due to lists being held per subgrantee. In these instances, energy auditors can identify if units have been previously weatherized. At that point, the weatherization director conducts further research to determine the length of time since weatherization was performed.

Describe what structures are eligible for weatherization

Eligible Structures include single family dwellings, manufactured housing, mobile homes, shelters and multifamily rental buildings. Any non-traditional structures such as tiny homes, apartments over businesses and shelters must have approval from KHC prior to any weatherization process beginning.

The weatherization of non-stationary campers and trailers that do not have a mailing address associated with the eligible applicant is not allowed. The use of a post office box for a non-stationary camper or trailer does not meet this requirement.

Describe how Rental Units/Multifamily Buildings will be addressed

Rental units include the following: single family homes and multi-family structures (including duplexes and four-plexes).

Before any weatherization services are provided, including inspection of rental units, ownership must be clearly established. Legal ownership, including all parties that have fractional or limited interest, shall be verified by a copy of the legal title (deed) which shall be kept on file with the agency overseeing the project.

A WX Rental (Agency/Landlord Weatherization Agreement for Rental Property) must be signed by both parties documenting and certifying they agree to comply with the terms of the agreement before weatherization work is initiated.

Determining property as "owner-occupied" or "rental":

Owner-Occupied

- If the applicant can be verified as the sole owner by a deed or a will, the dwelling shall be considered **owner-occupied**.
- If the applicants occupy a dwelling for which they are paying mortgage payments, have signed a land contract, or entered into a lease with the option to purchase, the property shall be considered **owner-occupied**.
- If the applicant applying for assistance has a legal fractional or limited interest in the property and pays no rent, such property shall be considered **owner-occupied**.

Rental

- If the applicant applying for assistance has no legal fractional or limited interest in the property being occupied, such property is **rental** regardless if rent is paid or not.
- If the applicant applying for assistance has a legal fractional or limited interest in the property but pays some sort of rent to one or more of the other fractional or limited interest owners, such shall be considered **rental**.
- If the applicant applying for assistance does not legally own the property but pays no rent and no other entity pays rent on his behalf, such property shall be considered **rental**.

Owner(s) Requirements

For any rental unit to receive weatherization service the occupants must meet the current income eligibility guidelines. Once eligibility (per WAP federal guidance for single and multifamily) is confirmed, the owner(s) of the housing unit(s) must agree to the following:

1. To not increase the rent on any living unit weatherized for a period of 18 months from the date of the final inspection as documented by the WX-710, Completed Dwelling Report. Furthermore, the owner shall not alter any other rental agreement that is in place for an 18-month period beginning with the date of the final inspection. For example, rent that includes utilities shall not be altered during the 18-month period unless it can be demonstrated in writing that such an alteration shall be in the best interests of the tenant occupying the rental unit. The service provider, as well as Kentucky Housing Corporation (KHC), shall reserve the right to accept or deny such alterations on an individual basis.

2. To enter into an Agency/Landlord Weatherization Agreement for Rental Property (WX Rental). This document shall be signed by the agency and owner; and kept on file with the agency overseeing the project.

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3. To not sell the rental unit(s) for a period of 18 months, and;
4. To reimburse the Kentucky Housing Corporation (KHC) Weatherization Assistance Program (WAP) the full cost of all weatherization funds in the event that unforeseen circumstances shall necessitate the sale of any and all rental units served within the 18-month period beginning with the date of the final inspection.
5. To inform all tenants about the scope and type of work that will likely be performed on their dwelling(s). This shall take place in conjunction with the program's routine client education component.

Tenant(s) Requirements

For any rental unit to be considered an eligible unit the occupants must meet the current income eligibility guidelines. Once eligibility is confirmed the tenant(s) of the housing unit(s) must agree to the following:

1. To abide by all conditions set forth on the Weatherization Application Form, including providing access to their dwelling for the contractor or work crew, representatives of the service provider, and KHC staff, as the dwelling is being weatherized.
2. To report to the service provider representative and KHC any increase in rent or other alteration in their rental agreement with the owner for an 18-month period beginning with date of the final inspection.

Service Provider Requirements

For any rental unit to receive weatherization service the occupants must meet the current income eligibility guidelines. Furthermore, the service provider shall establish clear ownership of the property including all parties with fractional and limited interest. A WX-800 Weatherization Application Form shall be completed for each living unit to be served as well as the following:

1. The service provider shall educate the occupant(s) about the weatherization work that will likely be performed on their dwelling.
2. The service provider shall oversee the project. As such, the service provider will assist as needed in every aspect of the job: scheduling, inspecting, special arrangements if any, resolving disputes, and obtaining all needed signatures and documentation.
3. The service provider shall ensure that all households in weatherized units have a direct means of communicating with its representatives during both the weatherization work and the ensuing 18-month rental control phase.
4. The service provider shall inspect, document, and develop work specifications for each living unit using accepted inspection processes and appropriate energy audit software. The service provider shall perform and document a final inspection which all parties involved must sign to verify completeness of and satisfaction with, all work performed.

Limitations and Scope of Work

Multifamily buildings are eligible if 66 percent of the dwelling units in the building (50 percent if fewer than five) meet WAP's income eligibility requirement for a family unit whose income is at or below 200 percent of the poverty level determined in accordance with criteria established by the Director of the Office of Management and Budget. Each property will be assigned a Priority Point number. This number will be determined by combining all priority points per eligible household and dividing that number by the total number of income eligible households that the property contains. This "Average" will be the number that is used to rank that property for the purposes of receiving Weatherization services. For the purposes of certifying a complex as eligible for Weatherization, all information will be current as of the date of initial application by the Landlord and verified by the service provider. Subsequent move-outs by tenants after this time will not affect the eligibility of the complex. However, after a period of one year has elapsed, the multifamily complex will need to be recertified. Multifamily properties on the list published by DOE are presumed to meet WAP income eligibility requirements but are not given any preference over properties not on the list with respect to eligibility or place in queue. Income data needs to be collected on these properties in order to give them an accurate priority point number (WPN 16-5 and WPN 16-6.) (KHC follows guidance in WPN 17-4 for choosing multifamily properties for eligibility.)

Any occupant of a rental unit of any kind is eligible for weatherization service provided the occupant's household meets the income guidelines set by the Department of Energy (DOE). Additionally, the owner(s) of the dwelling must agree to the conditions previously stated and enter into a Landlord/Tenant Agreement with the tenant(s). Apart from these conditions the following restrictions apply to weatherizing rental housing units:

1. No service provider shall weatherize more rental units than one-third (33%) of its planned completions for a contract year without written approval from KHC. In seeking such approval, the service provider must explain how exceeding this cap will benefit the clients that it serves and that in doing so equitable service shall be maintained throughout its entire service area.
2. No owner, developer, or landlord shall receive weatherization service for more than 25 rental units under its ownership (full or in partnership) with any individual service provider in a contract year, without written approval from KHC.

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3. KHC reserves the right to consider large multifamily projects that exceed the limitations described above and allow such projects to go forward provided the service provider can show that such projects are a best use of its resources for the area that it serves and equitable service will be maintained in its service area.
4. Service providers must contact KHC to request approval to pursue a multi-family building or complex prior to any review of the complex/building begins.
5. All rental weatherization projects shall be prepared and completed in accordance with the appropriate DOE approved energy audit software, local ordinances, state weatherization assistance program policy and prevailing building codes.
6. Multi-family buildings or complexes may be chosen through a variety of strategies, including but not limited to, KHC/USDA lists, advertising, or cold calls.
7. Service providers that wish to serve multifamily buildings or complexes (under one owner), with over 24 units per year must advertise in local media, i.e., newspapers, community cable channels, websites, etc. the opportunity for all area owners/landlords/developers to have their properties weatherized by the WAP. For such projects, KHC reserves the right to allow or deny service based on the written justification provided by the service provider, all other conditions described in this section, and assurance that all Equal Opportunity requirements with respect to contracting (if applicable) are met. Preference shall be given to owners/landlords/developers that make financial contributions towards the weatherization of their properties through buydowns or matching contributions.
8. If service providers want to pursue weatherization services for buildings they own (in full or in part), they must advertise in local media (e.g. newspapers, community cable channels, websites, etc.) to inform the community and provide a public comment period.
9. Service providers may do an initial "walk through" of the building prior to any applications or energy audits to determine that weatherization measures can be installed (if and when they are identified).
10. No undue or excessive enhancement to the value of the dwelling units is allowed. Only weatherization measures generated from the approved audit software, that is appropriate to the type of structure, may be installed. All Health and Safety measures must be in conformance with the Health and Safety section of this plan.

Describe the deferral Process

Deferrals:

Deferrals, or "walkaways" as they are commonly known, are processed accordingly:

1. Local agencies may defer weatherization work if they encounter problems that are beyond the scope of the Weatherization Assistance Program.
2. A "deferral" is a dwelling that has been inspected by a qualified person who has determined that conditions are present which prohibit rendering service.
3. It is the role of the energy auditor/dwelling needs evaluator to weigh all factors and decide whether to proceed or not. However, there may be some instances that a unit is deferred by decision of the weatherization director. These are very rare occurrences but may include dangers to crews and possible pandemic infections.
4. Deferring weatherization work does not mean assistance will never be available, but that any work must be postponed until problems can be resolved and alternative sources of help are found as necessary.
5. In the event the evaluator determines the dwelling is a deferral, the following procedures shall apply:
 - a. The client shall be informed in writing (via certified mail or the agency must obtain a signed document acknowledging receipt of deferral notice) as to why the dwelling cannot be weatherized. The conditions that must be corrected before service is provided must also be stated in writing.
 - b. The service provider is required to refer the client to any alternate program available in the area such as home rehab or LIHEAP-funded repair program.
 - c. The service provider shall clearly indicate in the client file why the dwelling was given "deferral" status. A copy of the client deferral letter and all referrals to other programs or services must be in the client file.
 - d. The client will receive all appropriate information prescribed in the Health and Safety section of the WXPM.
6. A "walk-away/deferral" is not a completion. Reimbursement for a "walkaway/deferral" shall be obtained through the normal monthly billing process and must be entered in the data collection software.
7. Deferral guidelines may include (but are not limited to) the following:

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- a. The client has known health conditions that prohibit the installation of insulation and other weatherization materials, such as COVID-19. Deferrals due to COVID-19, clients may call the subgrantee when they are finished with quarantining or ready for subgrantees to enter the home.
 - b. The building structure or its mechanical systems, including electrical and plumbing, are in such a state of disrepair that failure is imminent and the conditions cannot be resolved in a cost-effective manner.
 - c. The house has sewage, animal feces or other sanitary problems that would further endanger the client and the weatherization installers if weatherization work were performed.
 - d. The house has been condemned or electrical, heating, plumbing, or other equipment has been "red tagged" by a local or state building official or utilities.
 - e. Mold and Moisture problems are so severe they cannot be resolved under existing health and safety measures and minor repairs.
 - f. Dangerous conditions exist due to high carbon monoxide levels in combustion appliances, and cannot be resolved under existing health and safety measures.
 - g. The client is uncooperative, abusive, or threatening to crew, auditors, inspectors, contractors, or others who must work on or visit the house.
 - h. Lead-based paint is determined to be in the home and the extent and condition of lead-based paint in the house would potentially create further health and safety hazards.
 - i. Asbestos anywhere on the interior or the exterior of the dwelling would require deferral of weatherization services if any weatherization work measure would disturb the asbestos. Asbestos cannot be handled, altered, disturbed, cut, drilled, sanded or be subjected to any other action that would create a danger to the homeowner or any weatherization staff/contractor.
 - j. Flea/pest infestation within the dwelling, or in any area outside of the dwelling where weatherization staff/contractors would have to work (pests include but are not limited to: fleas, roaches, bed bugs, rodents).
 - k. If in the judgment of the energy auditor/dwelling needs evaluator, conditions exist which may pose a risk from fire, falling, poor sanitation, endanger the health and/or safety of the work crew or limit access for evaluation or measure installation. Work should not proceed until the condition(s) is/are corrected.
8. Local agencies must actively pursue all alternative options on behalf of the client, including referrals, and use good judgment in dealing with difficult situations.

Corrected Deferral Conditions

1. If a client has subsequently corrected issues/problems identified that constituted a deferral at the time of the dwelling needs evaluation or the initial application/screening process, the following process will apply:
- a.) The items identified that caused the initial deferral determination must be verified as having been corrected. Verification may take the form of a document specifically listing all items that caused the deferral, and a description of the actions taken that corrected the problems/issues. This document must be signed and dated by the client and once verified, signed and dated by the Weatherization Director and/or a certified Dwelling Needs Evaluator/Energy Auditor. The method of verification must also be recorded on this document, i.e. on-site verification at the client's home, etc.
 - b.) An applicant will remain eligible for weatherization services for 12 months from the date of verified eligibility. In addition to step a., if 12 months have passed from the date of verified eligibility, the household must show continued eligibility. If weatherization work has not begun after 12 months from the date of eligibility, the household must reapply in full.
- Once items a. and b. have been satisfied, the client application will be allowed to be moved to the top, the next to be served, on the prioritization list.

V.1.3 Definition of Children

Definition of children (below age): **18**

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.

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Native Americans identified as eligible shall receive benefits equivalent to the benefits provided to other low-income persons.

V.2 Selection of Areas to Be Served

Each service provider selected to operate the weatherization program will be a Community Action Agency (CAA) or other public or non-profit organization so that the entire state has access to weatherization services. The service providers are selected based on the Agency's ability to operate programs for low-income families and experience in operating a weatherization or housing rehabilitation/renovation program.

Community Action Kentucky (CAK) currently has twenty-three (23) defined Community Action Agency areas in the state of Kentucky. Funds will be allocated to those areas based on a defined formula and an allocation plan. Where the CAA for the geographic area has a demonstrated capacity to administer the program, the CAA will be the sub-recipient. All sub-recipients are expected to operate a program that meets the minimum standards as measured by the grantee during its on-site performance and compliance monitoring reviews.

In the event one of the identified agencies elects to stop providing WAP services or is unable to provide services under this plan due to severe compliance findings or other administrative issues, another entity or entities will be identified to serve that area. A request for qualifications will be issued and KHC will evaluate interested parties. When determining to which agency(ies) funds will be reallocated, KHC may consider such factors as work qualifications, remaining funds available to expend, proximity and ability to serve the additional area, as well as federal grant compliance history. Re-allocation of funds may be awarded through an open application. In situations where no CAA is available or eligible, other non-profits in the state will be eligible to receive the re-allocations.

V.3 Priorities

Once program eligibility has been established, applicant households will be prioritized based on its occupancy with preference given to those households containing an individual who is elderly, a young child (children at/or below the age of 6), or a disabled individual. Also, patterns of high energy burden are factored into the priority ranking. High energy burden points are assigned to households whose energy burden (expenditures divided by the annual income of that household) exceeds the median level of energy burden for all low-income households in the state. The state does not currently give a priority to high energy use.

Each eligible household is prioritized for selection to receive assistance. This is accomplished by using the information gathered on the application through a point system. The point system awards 10 points for elderly and disabled family members and 10 points if a household consists of a single elderly and/or disabled occupant. Additional points are awarded to households with the lowest annual income which use the highest percentage of their income for residential energy costs (energy burden), and households which use the highest cost fuels per BTU of energy provided. The point spread for the energy burden category ranges from two points for 0-6% of income used for energy costs to 15 points for 34% and above of income. The primary fuel type is also evaluated with a point spread ranging from 2 to 8 points with electricity receiving 8 points and coal receiving 2 points. In addition, if a household has members who are elderly or disabled, an additional 4 points will be added if the household's energy source is wood or 6 points if the energy source is coal. Households with children under the age of six will receive an additional 5 points.

Households that are eligible and have children identified by the Department for Community Based Services' local office as being at risk of being removed from the home; if the home conditions are substandard and are in need of weatherization, will be red flagged as priority and will receive service immediately. Examples of this include but are not limited to the following: breaches in the thermal envelope that could be repaired or replaced within the scope of program ECM or H&S policy, unsafe or inoperable heat system that could be repaired or replaced within the scope of program ECM or H&S policy, or other measures that could be repaired or replaced within the scope of program H&S policy,

Applications are taken throughout the contract period and maintained until services are provided. The service providers are required to re-prioritize applications on a regular basis. If the application is on file longer than twelve (12) months, the agency must contact the client to re-verify the information given at the time of application before service is provided. If the family size or amount of income has changed, a new application must be processed.

The service provider will be required to review and prioritize applications on a regular basis, at least every six (6) months, but no more than once a month, in order that those applicants with the highest priority ranking are served first. Applicants not receiving sufficient priority ratings for the period reviewed will be annotated and will remain eligible for the following period. Service providers have the option of prioritizing applications by county or for the entire service area, whichever helps the service provider utilize the work crews in the most cost-efficient manner.

It will be the responsibility of each service provider to ensure that major political subdivisions of its service area receive the same outreach and intake opportunities relative to their share of eligible household population. Each service provider must have the capacity to find and identify eligible households throughout its service area. KHC will monitor each service provider's files during program monitoring visits to ensure that sufficient applications are being accepted throughout its service area.

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Documentation of Eligible Units.

To be eligible for Weatherization services, a dwelling unit must be occupied by an eligible family unit as described above, a completed application must be on file and all client information verified and approved.

A dwelling unit or units whose principle purpose is to house on a temporary basis individuals who may or may not be related to one another are shelters and are eligible to receive services. Nursing homes, prisons, or similar institutional care facilities are not eligible. For determining the number of eligible dwelling units within a shelter, count each 800 square feet or each floor of the shelter, whichever creates the greater unit count as a dwelling unit.

Applicant income levels will be verified and documented through the use of the most recent check stub, Social Security checks, LIHEAP applications, Department for Community Based Services' TANF or K-TAP programs or food stamps verification printouts or other similar records. The intake worker will obtain these records during the application process. The application and supporting documentation will be reviewed and verified by the Weatherization Program Coordinator. The Weatherization Program Coordinator must sign the WX-800 certifying eligibility before any work can be done to the dwelling.

Supplementation of Funds:

The service providers will use funds provided under this grant to supplement, and not supplant, state or local funds.

In subcontracts, the wording is such as to restrict using Weatherization funds to supplant state or local funds. Where local funds provide related dwelling repair services, weatherization funds will be strictly used for approved conservation measures.

V.4 Climatic Conditions

The NEAT/MHEA or EQ-QUIP (appropriately) audit will be used for every evaluation performed. Audit results will ensure that the installed measures reflect the housing stock and climate through the application of local weather parameters and current dwelling characteristics and energy use data. Blower door use on every dwelling will assure minimum ventilation requirements are maintained. There are not enough differences in the climatic conditions in the state to have any major effect on the NEAT or MHEA audits.

[NCDC / Get/View Data / Comparative Climatic Data / Search](#)

Normal Monthly Heating Degree Days (Base 65)

	YRS												Annual Total	
JACKSON, KY	30	0	4	44	263	522	830	966	761	557	273	128	10	4358
LEXINGTON, KY	30	1	2	53	284	574	877	1026	819	616	332	119	13	4716
LOUISVILLE, KY	30	0	1	36	240	527	838	992	779	569	280	84	6	4352
PADUCAH KY	30	0	0	38	229	516	833	978	750	529	250	67	2	4192
GREATER CINCINNATI AP	30	1	3	68	326	626	953	1110	899	684	373	138	19	5200

Normal Monthly Cooling Degree Days (Base 65)

GREATER CINCINNATI AP	30	0	0	3	13	71	209	334	280	126	16	1	0	1053
JACKSON, KY	30	0	0	0	11	100	201	310	277	130	29	1	0	1059
LEXINGTON, KY	30	0	0	3	16	80	228	350	307	147	21	2	0	1154
LOUISVILLE, KY	30	0	0	6	24	109	287	421	374	189	29	3	1	1443
PADUCAH KY	30	0	0	6	33	122	320	444	377	191	37	3	0	1533

V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials

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Weatherization measures will be selected from those available through the NEAT or MHEA and specific additional itemized measures that are allowed by 10 CFR Part 440, Appendix A. Installed measures will be limited by the audit and allowable federal and state cost limits. All work must comply with the Kentucky Weatherization Program Manual (WXP) Revision date of 09/01/2019 and the Kentucky Weatherization Program Field Guide Revised date 4/2/18. Hard copies were distributed to all agencies and CAK. As these guides come up for revision new copies will be distributed. The field guide and program guide are also located on the resource tab of the KHC website's Weatherization page by pasting this link into your browser; <http://www.kyhousing.org/Development/Single-Family/Pages/Weatherization-Assistance-Program-Resources.aspx>. These versions are downloadable for immediate use. All units utilizing this funding award will be inspected to ensure compliance with the SWS incorporated in the Kentucky Weatherization Field Guide as approved by DOE.

Training Provided

The KHC Residential Energy Efficiency (REE) training center meets the milestones mentioned in WPN 15-4 by currently providing training on two levels:

Comprehensive Training (formerly called Tier 1 Training): Comprehensive, occupation-specific training following an IREC accredited curriculum aligned with the JTA for 4 different weatherization occupations (Retrofit Installer, Crew Leader, Energy Auditor and Quality Control Inspector). The REE training center is IREC accredited in the four Home Energy Professional (HEP) curricula and is also an approved BPI test facility. All training is taught by staff holding BPI certifications in those designations.

Specific Training (formerly called Tier 2 Training): Single-issue, short-term training to address to teach specific skills or address acute deficiencies in the field are also taught at the REE training center. These courses include: ASHRAE 62.2, Building Analyst, Combustion Appliance Zone, Zonal Pressure Diagnostics, Dwelling Needs Evaluator, Leakage Envelope and Ducts, and NEAT/MHEA. Individual sections of the Retrofit Installer class can be pulled out for focused training such as dense packed wall, crawlspace and chimney kit installation. This plan also recognizes conference training sessions to be included in this category.

Furthermore, past the requirements of WPN 15-4, Section 4, the REE center serves the multifamily weatherization market with a working multifamily building prop utilizing existing connected spaces and connected vertical spaces to simulate garden style units. REE has two staff trained as Multifamily Quality Control Inspectors. The training center has purchased a Multifamily Quality Control Inspector curriculum and began offering the class in 2018.

KHC will incorporate the following verbiage into all WAP contracts or agreements with subgrantees;

By signing this contract this entity acknowledges they understand the expectations for the quality of work to be delivered is to be equal to, and align with, the Kentucky Weatherization Field Guide and the National Renewable Energy Lab (NREL) Standard Work Specifications (SWS). Furthermore this entity acknowledges this verbiage and understanding is to be passed to any subcontractor in practicality and in all written agreements.

Type of Work Measures could include but are not limited to the services listed below:

Health and Safety

The correction of existing or potential conditions causing a safety hazard before, or because of, the installation of weatherization materials.

Health and Safety Justification

The average H&S amount per dwelling for the Kentucky WAP was at \$1,000 dollars, or more, for seven years. When analyzing this history, the percentage of health and safety is far greater in the earlier years due to the lower overall allowable cost per unit and the availability of LIHEAP funding. In 2009 our approved maximum H&S average per unit was increased to \$1,200 along with the increase to \$6,500 allowable maximum weatherization average per unit. LIHEAP transfer funding became available in 2013, and was pledged to be run exactly like the DOE WAP. However, our current state LIHEAP plan allows exceeding the DOE H&S cap with LIHEAP funds. Agencies must utilize LIHEAP or other non-DOE funds for any H&S amount exceeding their individual 15% DOE H&S allotment. These other funds must be segregated clearly in the client file and audit.

The heightened awareness of indoor air quality, due to implementation of ASHRAE 62.2, has brought an increase to the frequency rate at which mechanical ventilation is used in our state. Also an increase in pre-evaluation and final test out time has occurred since this new H&S plan was fully implemented. This additional time is necessary to spend with the client to carefully explain new elements such as the need for ventilation along with gathering written documentation that demonstrates the weatherizing agency has performed due diligence with respect to informing and educating the client of any known or perceived hazards.

As a state we will begin this program year with a shortage of QCI inspectors and an increase in H&S labor costs for the H&S portion of the

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process is anticipated.

Infiltration Reduction

Repairs to all areas of significant air infiltration, including attic bypasses and repairs to tighten heating ducts.

Baseload

Replacement of the following items is dependent upon NEAT/MHEA or EA-QUIP Audit:

Low Flow Showerheads - Minimum of 1 as plumbing conditions permit

Fluorescent Light Bulbs - Minimum of 1

Refrigerator Replacement per unit - Units to be replaced shall be taken to a facility licensed to reclaim refrigerant. No refrigerator taken out of service shall be sold or returned to service. Replacement refrigerators are basic units that do not include ice makers or water dispensers. Old refrigerator must be removed from the unit being served and disposed of per EPA standards.

Water heater jacket, pipe wrap or any energy using item that are not heat and cooling systems.

Attics

Attic insulation and incidental repairs.

Walls

Wall insulation and incidental repairs.

Floors

Floor insulation, water pipe wrap and other incidental repairs.

Incidental Repairs

Incidental Repairs are those repairs necessary for the effective performance or preservation of weatherization materials. When a repair activity is a component of an energy efficiency measure that is being installed then the installation and materials are part of the efficiency measure and are classified as incidental repair. Such repairs include, but are not limited to, repairing (or replacement if repair costs exceeds 75% of new installation) 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. Roof repair, knob and tube removal (including the installation of replacement wiring) for protection of and safety of insulation measures, minor electrical repairs (installing miscellaneous wiring, junction boxes and covers to ensure connections meet code), electrical upgrades to handle extra load for HVAC replacement, all meet the definition of incidental repair and are allowed as such. The cost of incidental repairs must be included in the cost of the package of measures.

Dwelling Needs Evaluation

Prior to any work being done on a dwelling, the dwelling must receive a Dwelling Needs Evaluation (DNE) as described below. Only those weatherization measures that are identified by the DNE and recommended by the WA 8.9 software can be performed. In addition, these measures cannot exceed cost limitations.

A. Site Eligibility and Dwelling Needs Evaluation Standards. Each dwelling will have, at a minimum, an onsite walk-through inspection of its interior, exterior and immediate surroundings by a qualified Dwelling Needs Evaluator.

B. Site Ineligibility. Should any dwelling be determined to be ineligible (See Section V.1.2 Deferral) due to site conditions, the client will be advised of the problem and, if possible, of other service organizations that may be able to assist in solving the problem. The client shall be informed in writing as to why the dwelling cannot be weatherized. If there are conditions that the client must correct before service is provided those conditions must also be stated in writing. The service provider shall clearly indicate in the client file why the dwelling was given "deferral" status. A "walk-away/deferral" is not a completion. Reimbursement for "walk-away/deferral" shall be obtained through the normal monthly billing process. In the comments section of the WX710, Completed Dwelling Report, indicate that the dwelling is a "walk-away/deferral" and the client was advised of the conditions determining this status.

Each service provider must have available a system for a timely and fair administrative hearing of complaints received from clients denied services. An unreasonable delay in acting on an application for assistance will constitute grounds for a hearing.

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At the time of application, the applicant is given a written notice outlining the applicant's rights and the method to file a complaint. All Service Providers are required to adhere to their agency's grievance policies. If the grievance cannot be resolved through the service provider's process, the applicant may file a complaint with CAK. If CAK cannot resolve the issue, the applicant will be informed that he/she may file a complaint with KHC.

Dwelling Needs Evaluation. Each dwelling that passes the walk-thru inspection shall receive a Dwelling Needs Evaluation (DNE) including a NEAT/MHEA audit and be determined as eligible in accordance with the following procedures and standards:

1. Identification of Living Area and Thermal Boundaries. The dwelling's living area and the thermal boundaries encompassing its living area shall be identified based on a client interview and on-site verification using the following definitions:

- a. Conditioned Space. Any area within the dwelling where the air is intentionally thermally altered by the use of space heating or cooling equipment.
- b. Unconditioned Space. Outside of the dwelling and any area within the dwelling that is not conditioned.
- c. Thermal Boundaries. Building components of a dwelling that separate conditioned and unconditioned spaces.
- d. Living Area. All of the conditioned space within a dwelling enclosed by the thermal boundaries.

2. Identification of Energy Systems. The dwelling's energy systems, as defined in the KY WX Program Manual, will be identified based on a client interview and on-site verification.

3. Whole-House Approach to DNE. After the living area, its thermal boundaries, and the energy system have been identified, a DNE is performed following a step-by-step process described in the KY WX Program Manual. The DNE will be developed using a whole-house approach. The evaluator will consider the existing relationships and the potential relationships based on measures to be performed, between the dwelling energy systems, its air infiltration rate and locations of air leakage sites, the insulation within and on its thermal boundaries, its internal moisture producing and retention capacities and its overall ventilation needs.

4. Maximum Cost Limitation Standards. The regular Weatherization average cost per dwelling will not exceed \$7,779 for this contract year, excluding health and safety measures. Health and safety costs for materials and labor will have an average limited to 15% of the final average cost per unit, not exceeding a maximum of \$3,000 per unit, without written approval from KHC.

The DNE will assess, at a minimum, the following:

- a. The living area be heated in a safe and healthful manner, that non-heating system combustion appliances within the living area operate in a safe and healthful manner, and that no leaks exist in any fuel lines from the meter or tank to an appliance in the dwelling.
- b. Air infiltration through the thermal boundaries.
- c. The water heater and heating system ducts.
- d. Ceilings that are thermal boundaries be insulated to a minimum R-49 where possible.
- e. All attic areas be properly ventilated.
- f. Walls that are thermal boundaries be insulated.
- g. Thermal boundaries be insulated to a minimum: R-19 for floors, R-49 for attics, R-13 for 4" wall, and R-19 for 6" wall, where possible.
- h. Solid foundations, including skirting, that enclose unconditioned spaces below a thermal boundary, be properly ventilated.
- i. Baseload consumption be checked.

DNE Ineligibility Procedures. Should any dwelling be determined to be ineligible for health and safety measures or regular weatherization measures due to exceeding the maximum cost limitations, the evaluator will attempt to reduce the dwelling's living area through consultation with the client. If it is not possible to reduce the dwelling's living area, the evaluator will attempt to secure other resources to supplement weatherization funds.

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Single-Family: 4/5/2018
Manufactured Housing: 4/5/2018
Multi-Family: 4/5/2018

V.5.2 Energy Audit Procedures

Audit Procedures and Dates Most Recently Approved by DOE

Audit Procedure: Single-Family Audit Name: Other (specify) DOE approved Kentucky for NEAT 8.9.5 on December 12, 2019. Approval Date: 12/12/2019
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Audit Procedure: Manufactured Housing Audit Name: Other (specify) DOE approved Kentucky for MHEA 8.9.5 on December 12, 2019. Approval Date: 12/12/2019

Audit Procedure: Multi-Family Audit Name: Other (specify) We do not have a large multi-family approved at this time. We will consider submission for approval in the next 12 months. Approval Date:
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Comments

Kentucky received approval to use the NEAT/MHEA Audit for determining the most cost effective measures on all site-built dwellings December 12, 2019. All dwellings to be weatherized must have either a NEAT/MHEA audit or any other DOE approved audit software performed.

In addition to using the NEAT/MHEA audit or any other DOE approved audit software, each dwelling's energy system is inspected for health and safety and receives repairs as necessary. The evaluators have been equipped and trained to measure heating unit efficiency in the dwelling evaluation process. These inspections and subsequent repairs include all fuel lines, the primary heating unit, other combustible fuel appliances and all exhaust gas venting.

DOE has also approved KHC to use LED light bulbs with the restrictions that LEDs will be Energy Star qualified or of equal or better quality and efficiency.

KHC reserves the right to require approval on any or all audits, prior to work being performed.

KHC will transition to the online version (v10) of the NEAT and MHEA audit tools using the following timeline:

Task	Intended Outcome	Target Date
Conversion Curriculum Released by ORNL, KHC technical team reviews and prepares for transition	KHC technical team develops proficiency with online WA products	Spring 2021
Provide feedback to ORNL on needs for Core Curriculum	Identify tools needed to train Kentucky WAP network	Summer 2021
Receive Core Curriculum from ORNL/DOE; KHC technical team prepares for implementation	KHC technical team familiarizes with training curriculum	Fall 2021
Attend train-the-trainer event for Grantees and Training Providers	KHC technical team is equipped in development and delivery of training on WA v10	Winter 2021
Conduct in-person or virtual	Train the Kentucky WAP	

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training sessions with each subgrantee	network on use of online WA audit tools	Spring-Summer 2022
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Training of the Kentucky WAP network will be conducted by KHC's Residential Energy Efficiency (REE) training center at 600 Warsaw Drive, Frankfort, KY 40601. Training may be conducted in person or via virtual classroom.

V.5.3 Final Inspection

Each dwelling unit will be reported as completed only after a service provider's BPI-certified Quality Control Inspector has performed a final inspection and certified that all work has been completed in a skillful manner in accordance with the measure priorities determined by the audit procedures and in compliance with federal and state material specifications and installation guidelines. All tasks performed on client homes must meet the specifications, objectives and desired outcomes outlined in the Kentucky Weatherization Field Guide (March 2021 Version) which references the Standard Work Specifications for Home Energy Upgrades (SWS) where applicable.

The service provider's certified Quality Control Inspector will perform a thorough and complete post inspection in accordance with all standards in KY's program. The QCI final inspection will not be performed by the same person who performed or installed weatherization measures or health and safety measures listed on the Work Order. In many instances, the QCI may perform the energy audit and do the final inspection; however, KHC is controlling for this issue by monitoring 10 percent of jobs at all subgrantees.

Each dwelling will receive energy systems safety tests and a blower door test. A back-drafting, worst case scenario test will be performed on all vented combustion appliances.

This final inspection is documented using the "Completed Dwelling Report" (WX-710) and the QCI Inspection Form. The WX-710 is designed for service providers that use either staff work crews or private sector contractors. An appropriate service provider representative must fill out and sign the WX-710 before a dwelling can be reported as complete. The WX-710 requires the inspector to sign a statement certifying that all material installations complied with minimum standards and include job costs, blower door and client demographic information. Service providers are required to submit a copy of the Completed Dwelling Report (WX-710) for every unit reported as completed on the WX702. The QCI Inspection Form must be filled out and signed by the agency's certified QCI person and kept in the client file. (Note: See section V.8.3 for actions taken when QCI fails to perform properly.)

State monitoring QCI staff will use the same QCI Inspection Form and it will be saved in the agency's electronic file. These forms can be found on the KHC website's Weatherization page by following the instructions regarding the field guide and program manuals (below) and clicking on the Weatherization Forms line.

The Kentucky Weatherization Field Guide was fully approved on March 23, 2021 and the NEAT/MHEA audit was fully approved on December 12, 2019. Hard copies were distributed to all agencies and CAK as well as posted on KHC's website. Egrams are sent to egram members, notifying members of updated materials. Subgrantees are held accountable for reading the egrams per their grant agreements. The field guide and program guide are also located on the resource tab of the KHC website's Weatherization page (<https://www.kyhousing.org/Partners/Developers/Single-Family/Weatherization-Assistance/Pages/WAP-Resources.aspx>). All units utilizing this funding award will be inspected to ensure compliance with the SWS incorporated in the Kentucky Weatherization Field Guide as approved by DOE. All final inspections and monitoring inspections will be conducted and signed by a certified QCI.

We are willing to work with contract inspectors seeking QCI certification by reimbursing the cost of training provided they are willing to sign a 24-month retention agreement to work in the program.

Currently we have three QCI certified monitoring staff. We realize the potential for turnover and the need for adhoc training. Our current training facility has been upgraded and supports a variety of WAP training needs. The ability to deliver accredited training in the ANSI certified Home Energy Professional curricula enhances our ability to maintain QCI persons serving the program.

For information on corrective action plans and corrective actions taken against poorly performing QCIs, EAs, and or DNEs, please see section v8.3.

V.6 Weatherization Analysis of Effectiveness

An electronic invoice is generated by each Weatherization Assistance Program service provider in our KY GREEN system based on monthly production and expenditures. The invoice includes information related to household demographics; material, labor and support expenditures; and

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number of completed dwellings on a monthly and cumulative basis. This information is then used to calculate average costs per dwelling for materials, labor, and support for an overall total cost average for each category. Invoices are reviewed monthly and the averages compared with similar service providers and to each service provider's planned production and expenditure goals.

When a service provider is identified during on-site monitoring or on monthly reports as exhibiting a pattern of poor work orders, poor work quality, or low production, a training and technical assistance visit is scheduled or a webinar is held, whichever is appropriate. The visit will focus on the specific problem and involve both desk review and field training. Follow up monitoring is performed by review of documented corrections, photo documentation or a repeat visit if necessary.

Implementing electronic audit reviews at monitoring has proven beneficial in various ways by helping bring consistency to audits statewide, increased understanding, and identification of training opportunities when audit users cannot perform.

Training efforts are not only focused on problematic areas but are also focused on keeping existing staff and new hires current with program updates. Turnover creates the need for an ongoing training presence facilitates the need for both continuing education and entry level training. The training center has successfully presented training in the following categories: QCI, EA, Crew Leader, Retrofit Installer, Dwelling Needs Evaluator, Infiltration and Duct Leakage, Combustion Appliance Zone Safety, Zonal Pressure Diagnostics, NEAT/MHEA and ASHRAE. Multiple, fully-functional training labs has enabled real life, hands-on training under realistic field conditions.

A consistent focus and commitment to increasing our training quality will lead the way to an overall improvement and consistency in the quality of work delivered in KY. Two of our trainers have achieved proctor status in both field and written exams for all four Home Energy Professional designations. We also have one other KHC staff who has achieved written proctor status.

A new strategy for agency oversight is to take a minimum 10% sampling of units from each agency, compute the blower door reduction (expressed as a percentage), and identify the median blower door reduction percentage, per agency. Using median figures will minimize the skewing of data due to single unit outliers with extraordinary percentages. These agency medians can provide a comparison of agencies to identify quality work and agencies that may need additional training.

V.7 Health and Safety

See SF-424 attached 2021 Kentucky Health & Safety Plan.

V.8 Program Management

V.8.1 Overview and Organization

The Weatherization Assistance Program will be administered by Kentucky Housing Corporation (KHC). KHC is a quasi-state agency acting as the state housing finance agency. KHC is administratively attached to state government under the finance cabinet but receives no operations funding from the state budget.

While KHC has been administering federal housing programs since its creation in 1972, the administration of DOE and LIHEAP funded weatherization programs was brought to KHC in 2009. KHC does not administer any LIHEAP heating assistance funding. Our state energy programs are conducted from Kentucky's Energy and Environment Cabinet.

The weatherization program is administered at KHC out of two departments. The technical aspects (training and technical monitoring) are undertaken by the Design and Construction department which maintains QCI certified staff and building specialists. The program administration (contract monitoring, financial management, reporting) is conducted in the Housing Contract Administration (HCA) department. HCA administers 14 different funding streams (most of them federal) with support from an Internal Audit department and Legal staff.

KHC will enter into a funding agreement with Community Action Kentucky (CAK) and the identified sub-recipients. Funding agreements will define the responsibilities of all parties related to the administration of the weatherization assistance program. Program manuals defining administrative policies, technical specifications and financial management procedures will also be provided to the sub-recipients to assist them with proper implementation of their program.

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V.8.2 Administrative Expenditure Limits

The Grantee will retain no more than 7.5% of available funds for administrative purposes, of which a portion will be made available to Community Action Kentucky (CAK) for their administrative assistance. The service providers will receive 7.5% administrative funds.

At the decision of KHC, an additional 5% may be allocated to service providers if the following conditions are met:

1. The service provider is not administering the program under any sanctions or a corrective action plan, and;
2. The service provider has no excessive administrative charges against the program, and;
3. Any outstanding audit has been finalized, and;
4. The service provider received less than \$350,000 of new DOE funds to operate the program;

V.8.3 Monitoring Activities

In compliance with 10 CFR 440.12(b)(6), KHC has established the following monitoring plan to ensure service providers adhere to contractual and federal regulatory constraints, have adequate programmatic and financial management control, and achieve acceptable quality standards in the field work performed:

- All service providers will receive on-site monitoring and desk reviews during the contract year for program oversight using an On-Site Dwelling Review Report, Weatherization Program Review, monitoring reports from previous visits, and the Service Cost Worksheet. A minimum of 5% of each subgrantee agency's production (from one year previous to the date of the monitoring) will be reviewed. Due to the varying size of the state's participating service providers there are two different avenues of final inspection. First an independent inspection performed by a QCI who has not performed the audit. The second option is a final inspection of a unit by the same person who performed the audit. In order to enhance the review of agencies utilizing the second approach, due to small staff size or efficiency, an increased number of units, (10% from one year previous to the date of the monitoring), must be monitored. These monitorings will begin in the first quarter of the program year. Annual monitorings will include a visit to an in-progress job if possible and documented with the results of the other completed jobs. The monitors will issue letters of finding, concerns, observations, recommendations and commendations within 30 days of the exit conference at the agency's main office location. Corrective action plans will be mandatory for any significant issues.
- All Service Providers, including CAK, will be monitored for sub-contract compliance and financial management.
- All sub-grantees' financial audit reports will be reviewed annually.
- An annual review of the audit will be performed by KHC. The review will compare the audit schedules related to weatherization expenses as well as review the entire audit for any findings or concerns.

A monthly desk review of each service provider's Invoice and completed dwelling reports and other required documents will be performed. The purpose of the review is to tie invoices to reported completions by comparing expenditures in draws to the database system. Unless there is a justification as to why the two reports are not in agreement, invoice requests will be denied.

A monthly desk review of each service provider will be conducted to:

- Confirm demographic data is correct for reporting,
- Ensure Service Costs are within their allotted caps and identical to KY Green entries,
- Check program completion averages for H&S, Program Support, Weatherization Costs and Materials,
- Compare expenditure rates,
- Review allocation budgets.

The KHC weatherization technical monitors will review field work, provide training & technical assistance, review program performance, and provide management with an assessment of the program. KHC is currently conducting virtual technical monitoring in accordance with the attached DOE-approved virtual monitoring plan.

An on-site dwelling review will be conducted annually by the KHC weatherization monitoring staff on a representative sample of each service provider's completed dwellings to ensure that all work meets WAP standards. Work quality will be evaluated as well as completeness, compliance with NEAT/MHEA or EA-QUIP audit priorities and expenditure maximums, and performance of diagnostic procedures. The client files of all dwellings inspected will be reviewed to determine that all required forms are included and that they are accurate and complete. A complete list of required client file documentation is located in section 1.5 of the Kentucky Weatherization Program Manual.

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1. An Application and Prioritization for Weatherization, WX-800;
2. Income verification;
3. Proof of ownership, or
4. Agency/Landlord Agreement, WX Rental
5. Work Order and completion report, generated from approved audit software
6. (Completed Dwelling Report,) WX-710
7. Copy of the NEAT, MHEA or EA-QUIP audit
8. Energy Systems Check List
9. Agency Contractor Agreement, WX-14 (Private Contractor)
10. Contractor Notice of Completion WX-16 (Private Contractor)
11. Change Order, WX-15, if applicable
12. Private Contractor Invoice, WX-17, if applicable
13. Request to Exceed WX910/Fuel Change Request, if applicable
14. EPA verification statements regarding Lead and Mold Hazards
15. Baseload check list, WX-BLR
16. Project Review 106
17. Health and Safety Client Screening Questionnaire

Previous monitoring findings and recommendations will be reviewed (via emailed photo documentation or future onsite visit) to evaluate the success and appropriateness of all corrective actions implemented by the service provider. Upon completion of the on-site review, the monitor will hold an exit conference with the service provider's Executive Director, the Weatherization Program Coordinator and other appropriate staff to review all findings, conclusions, and possible recommendations. Upon completion of a written report, KHC will determine any actions warranted by the monitor's findings.

KHC will monitor NEAT/MHEA audit library set up costs during the annual onsite technical review. Any service provider found to be paying substantially more than other service providers in their geographical area will be required to rebid those materials and/or services. KHC reserves the right to approve or deny any inputs that appear to not be cost effective.

For fiscal performance monitoring, KHC weatherization monitors will verify compliance with and documentation of these fiscal requirements: expenditures, source and application of funds for expenditures, access to and retention of fiscal records, previous contract audit, costs, other resources, invoicing, and liability insurance policy. KHC weatherization staff will review the invoices and expenditures on a monthly basis for expenditures to the appropriate funding source. If expenditures exceed the planned budget, a budget realignment will be required.

For contractual monitoring, the KHC compliance officer will verify compliance with and documentation of these contractual requirements: disallowed cost reimbursements, reporting, personnel policies, record confidentiality, conflict of interest and nepotism, client and dwelling eligibility, documentation of training, purchase bidding, listed assurances and certifications and record retention. The monitor will also look at the Weatherization Contractor Work Reference WX-11; the Approved Vendor List; and the Service Cost Worksheet ~~WX-702~~. On-site monitoring will take place throughout the program year with the majority being conducted in the final 6 months of the grant term.

We feel a three-pronged (technical, programmatic and compliance) monitoring approach has helped us identify agencies in the past year who needed assistance at a variety of levels. It has also influenced the decision to increase oversight during the invoice process which has spurred additional audit training and more specific audit outcome related procedures.

Monitoring findings require a follow-up action by the monitor to ensure appropriate corrective action.

When concerns arise staff meetings are held to assess the current quality of services provided. Trends are discussed and determinations for corrective and punitive actions are made and presented to leadership for concurrence. KHC reserves the right to increase site visits and complete unit monitoring for any agency with significant or persistent deficiencies.

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KHC will review each service provider's progress, identify those with problems, provide technical assistance and training where necessary and request a Corrective Action Plan. When determined necessary, CAK will provide technical assistance to agencies having administrative or technical problems. Agencies working under a Corrective Action Plan will be monitored closely for signs of improvement.

Corrective Action:

Service providers identified as not meeting the planned goals of the program, who lack in proper supervision, do poor quality work, have not implemented new procedures, exceed cost limitations, experience high overhead, or are overall poor performers, are subject to having their funding levels reduced, reimbursements recaptured, or potential termination as a service provider until programmatic improvements are made. Prior to taking steps to terminate the service provider, the problems will be identified and the service provider will be contacted and required to submit a Corrective Action Plan outlining the steps to make improvements in the areas identified. Staff of KHC and/or staff of CAK, will provide assistance to the agency in order to improve the status of a service provider.

Building Performance Institute (BPI) Quality Control Inspectors (QCIs), Energy Auditors (EAs) and Kentucky Certified Dwelling Needs Evaluators (DNEs) Who Fail To Properly Perform

Anyone holding a BPI QCI or EA or KY DNE certification and performing pre-inspection or final inspection services where a QCI/EA/DNE certified staff is required must uphold BPI and KY WAP standards of ethics. When any QCI/EA/DNE staff becomes aware of activities in violation of the Weatherization Assistance Program requirements, they are obligated to report those activities to Kentucky Housing Corporation. This section applies to KHC, agency and contract staff. Agreements with contracted staff must include the duty to report violations of BPI and KY WAP standards of ethics.

KHC will take a three step approach to QCI/EA/DNE inspectors who are not inspecting units using the standards adopted in the Kentucky Weatherization Field Guide and the NREL SWS. KHC reserves the right to issue (or not issue) one verbal warning before beginning the process below if the deficiency found is not systemic throughout the inspector's performance.

In the case of BPI-certified EAs and QCIs, the first offense will begin with a written reprimand and notification to BPI of the circumstances involving the issuance of the reprimand.

Second offense will result in a written reprimand and notification to BPI of the circumstances involving the issuance of the reprimand and a six month suspension from inspecting (pre- or post-inspection) for the WAP in Kentucky.

Third offense will result in debarment from inspecting (pre- or post-inspection) for the WAP in Kentucky and notification to BPI of the circumstances involving the debarment.

In the case of Dwelling Needs Evaluators, the first offense will begin with a written reprimand and notification to the DNE's employer of the circumstances involving the issuance of the reprimand.

Second offense will result in downgrading the evaluator's DNE certification status to conditional and requiring the evaluator to successfully complete all additional training and field shadowing deemed necessary by the KHC technical monitor.

Third offense will result in permanent revocation of the DNE certification.

KHC reserves the right to downgrade or revoke a DNE certification at any time if the deficiencies identified demonstrate a disregard for program standards or are of a nature that jeopardizes the health or safety of clients or workers.

Staff with Monitoring and/or Compliance Responsibilities:

Partially paid with DOE Administrative Funds (40%)

Leslie Marcum – Compliance

13 years experience with the Weatherization Program and other federal housing programs
(5 of those as an Agency Weatherization Director, 4 in Compliance Monitoring)

Partially paid with DOE T/TA funds (51% of T/TA budget used for salary and travel)

John Cora-- Assistant Director of Design and Construction Review

Level III KY Certified Code Official

KY Dwelling Needs Evaluator

30 years construction related experience

7 years experience in WAP administration

2 years WAP field experience

Deanna McCord - Manager, Training Initiatives

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20 years compliance experience
more than 10 years WAP program experience
BPI Building Analyst
Troy Gosser - Monitor/Trainer
Level 1 Infrared Thermography Certification
BPI QCI, EA, RIT, CL, BA, IDL, HHE
Certified Lead Renovator
OSHA 30
Healthy Home Evaluator train-the-trainer
Kentucky Dwelling Needs Evaluator
Lead Safe Work Practices
ASHRAE 62.2 2016
Employee Discrimination and Harassment Prevention
Multifamily QCI
Dewayne Cade - Monitor/Trainer
Level 1 Infrared Thermography Certification
BPI QCI, EA, RIT, BA, HHE
Certified Lead Renovator
OSHA 30
Healthy Home Evaluator train-the-trainer
Kentucky Dwelling Needs Evaluator
ASHRAE 62.2-2016
Multifamily QCI
Wesley Melson – Monitor/Trainer
Licensed KY Master Electrician
BPI QCI, EA, BA
Lead Safe Work Practices
ASHRAE 62.2 2016
Certified Lead Renovator
OSHA 30
ISD training
Kentucky Dwelling Needs Evaluator

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V.8.4 Training and Technical Assistance Approach and Activities

Training and technical assistance (T&TA) is available and required for all service provider agency personnel and private contractors providing any aspect of operating the Weatherization Assistance Program. Requests can be initiated by a service provider, monitor, CAK or KHC program staff.

For grantee provided assistance, KHC will determine the most appropriate personnel or method to provide training and technical assistance. Classroom and field training sessions providing hands-on experience will continue for service provider evaluators performing energy system health and safety tests and repairs. Field training sessions will reinforce classroom training that has already been conducted and will provide updated information on new heating equipment and components.

The KHC Residential Energy Efficiency training center meets the requirements outlined in Section 4 of WPN 15-4 by providing training on the two required levels.

Comprehensive Training

Our training facility includes two classrooms, a combustion lab, CAZ & ASHRAE demonstration rooms, a heat system lab, multifamily training lab and a mobile home housed inside a 7200-square foot facility. Our training center has been renamed and is now called Residential Energy Efficiency (REE) training initiatives. The center has received IREC accreditation for its Energy Auditor, Quality Control Inspector, Retrofit Installer Technician and Crew Leader curricula.

All staff hired to provide services equal to the JTA of a Retrofit Installer Technician must receive Comprehensive Training from an IREC-accredited within the first six months of their hire and must receive the same or equivalent training every five (5) years after the completion of their initial training to serve as a refresher.

All staff hired to provide services equal to the JTA of a Crew Leader must register for Comprehensive Training from an IREC-accredited the duties of the Crew Leader position and must receive the same or equivalent training every five (5) years after the completion of their initial training to serve as a refresher.

All staff hired to provide services equal to the JTA of an Energy Auditor must receive Comprehensive Training from an IREC-accredited facility and curriculum for Energy Auditor before performing the duties of the Energy Auditor position and must receive the same or equivalent training every five (5) years after the completion of their initial training to serve as a refresher.

All staff hired to provide services equal to the JTA of a Quality Control Inspector must receive Comprehensive Training from an IREC-accredited facility and curriculum for Quality Control Inspector before performing the duties of the Quality Control Inspector position and must receive the same or equivalent training every five (5) years after the completion of their initial training to serve as a refresher.

All staff providing QCI services in multifamily buildings must receive Comprehensive Training aligned with the NREL Multifamily Quality Control Inspector JTA before performing the duties of the Multifamily Quality Control Inspector position and must receive the same or equivalent training every five (5) years after the completion of their initial training to serve as a refresher.

All required training props have been constructed in order to not only teach these BPI-aligned HEP courses but also to perform BPI certification testing. The REE center has received certification from BPI as an official testing location. We can now train and test for BPI Quality Control Inspector, Energy Auditor, Retrofit Installer Technician, Crew Leader, Building Analyst, Infiltration and Duct Leakage, and Healthy Home Evaluator certifications.

Specific Training

Single-issue, short-term training to address acute deficiencies in the field are also taught at the REE training center. These courses include: ASHRAE 62.2, Building Analyst, Combustion Appliance Zone Safety, Zonal Pressure Diagnostics, Dwelling Needs Evaluator, Leakage Envelope and Ducts, and NEAT/MHEA Audit Software. Individual sections of the Retrofit Installer class can be pulled out for focused training such as dense packed wall, crawlspace and chimney kit installation. Training and technical assistance will also be provided through on-site visits, webinars, interactive web-based meetings, regional training sessions or statewide training sessions and third-party providers such as OSHA online training, CPR, online asbestos awareness training, online mold and moisture training, online lead safe weatherization and 3rd-party hands-on lead safe weatherization training.

The REE center training courses can be found online at www.learnree.com.

For out-of-state training:

Comprehensive and Specific trainings the sub-recipient must maintain documentation showing why similar training was not available or cost effective in Kentucky.

The REE training center houses a multifamily training lab consisting of connected vertical spaces to simulate garden style units and provides training that aligns with the NREL Multifamily Quality Control Inspector JTA.

After concluding a training or technical assistance activity, the specifics of trainings are documented including which trainer conducted the activity, what training or assistance was provided, when and where the activity occurred, and which service provider staff participated in the activity. These reports will be completed by each agency and kept in their records.

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KHC will provide training and technical assistance to all service providers as described in the following plan:

- 1) Routine Technical Assistance. Technical assistance covering any programmatic aspect of operations can be provided by the monitoring staff (during monitoring visits), CAK or KHC staff. Technical assistance can be offered any time the service provider encounters a problem or issue. If the monitor identifies major problems that can't be addressed during the monitoring visit, more extensive technical assistance will be scheduled in the immediate future following the monitoring visit. Technical assistance related to the actual installation of weatherization measures will be provided by experienced staff.
- 2) State Training. Statewide training will be scheduled by KHC when it is deemed necessary. Appropriate service provider staff and private contractors are required to attend each state sponsored training session. Funds are made available to support the expenses incurred while attending the training for agency staff and private contractors. Semi-annual state-wide T&TA meetings are held to provide general program updates and share programmatic and technical information and guidance.
- 3) Agency Comparisons - Technical staff meetings are held to assess the current quality of services provided. Trends are discussed and determinations for network wide or targeted agency training made based on the work and production reviewed by three staff persons who rotate between training and monitoring duties. The focus of these meetings is to share information on work quality observed in the field, to identify areas of improvement in the training curriculum and to give field monitors awareness of students who may need additional field mentoring after coming out of the classroom experience.

Additionally, the reviews performed by our compliance staff identify training needs. Frequent interaction among staff identifies problematic areas at specific agencies. This three-pronged approach (technical, programmatic and compliance) has helped agencies who have experienced leadership changes and organizational challenges.

Training is provided by Kentucky Housing Corporation's (KHC) Residential Energy Efficiency (REE) Training Center, or by outside trainers. Anyone working in the Weatherization Program, including private contractors, are required to attend training sessions as they relate to their job duties.

While each service provider is allocated sufficient funds to attend trainings and conferences, prudent use of the training funds is expected. Service providers are required to maintain information in their files to document that all expenses for training are both reasonable and necessary for implementation of the weatherization program. Expenses for out of state training must be documented showing why a similar training could not be accessed in Kentucky. Training and Technical Assistance funds allocated to agencies cannot be used to pay for Energy Auditor or QCI training/testing in excess of three times per staff person. Additional trainings/testing for that person's QCI must be covered by another funding source.

T&TA funds may also be used to train Subgrantee contractors participating in the Program. In making the determination to pay for contractors' training, Subgrantees must secure a retention agreement in exchange for the training. The retention agreement must require that contractors will work in the Program for a specific amount of time which must align with the cost of the T&TA provided. Examples of contractor/agency retention agreements can be found on EERE's website under WPN 10-1.

Training Curricula

The following courses are provided by Kentucky's REE Training Center on a routine basis:

- Asbestos Awareness
- Mold and Moisture
- Kentucky Weatherization Program Field Guide
- Leakage, Envelopes and Ducts (LED)
- ASHRAE 62.2 - 2016
- Combustion Appliance Zone Safety (CAZ)
- Zonal Pressure Diagnostics
- NEAT/MHEA Software
- Retrofit Installer Technician (RIT)
- Crew Leader (CL)
- Quality Control Inspector (QCI)
- Energy Auditor (EA)
- Dwelling Needs Evaluator (DNE)

Courses offered on an as-needed basis:

- Building Analyst
- Multifamily Quality Control Inspector
- Kentucky WAP Policies and Procedures
- Heat Systems
- Healthy Home Evaluation

Following are the training requirements for each job position in the WAP. Failure of a service provider staff member or private contractor to meet the following series of certification criteria for the position in which they are employed and within the time frames established by KHC will result in that individual or private contractor being prohibited from performing the assigned or contracted activities on client dwellings. Participation in and the successful completion of advanced, refresher and other related training is required to maintain qualified staff to perform program activities. KHC will make every effort to assist service provider personnel with attaining the required skill levels.

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Training and Certification Requirements to Perform Dwelling Needs Evaluation in the Kentucky WAP

Any service provider weatherization staff assigned dwelling needs evaluation or inspection activities as any portion of their job duties must participate in and successfully pass each training requirement listed here as well as any other training deemed necessary by KHC.

Dwelling Needs Evaluator (DNE) class

NEAT/MHEA, EA-Quip Software

Leakage, Envelope and Ducts (LED) class

Combustion Appliance Zone Safety (CAZ) class

Zonal Pressure Diagnostics (Zonals) class

ASHRAE 62.2-2016 class

Intro to WX online course (Mold & Moisture, Asbestos Awareness, KY WX Field Guide)

Lead Renovator Certification (RRP)

First Aid Certification

CPR Certification

Field Shadowing

After successful completion of all training requirements credentialing track, s/he is awarded "Conditional Status". An evaluator in Conditional Status may not perform solo work, they must be monitored by the agency's fully-certified evaluators and administrative staff to ensure quality. Once an evaluator in Conditional Status is ready for Field Shadowing, the agency must contact its KHC Technical Monitor to schedule the shadowing visit. Field Shadowing must be scheduled no later than six (6) months from the date the candidate achieved Conditional Status. Failure to complete the Field Shadowing within the required timeframe will result in the revocation of Conditional Status and the candidate will be required to attend refresher training to have Conditional Status reinstated.

Field Shadowing is the final step in the approval process for performing dwelling needs evaluation. During Field Shadowing, a KHC Technical Monitor/Trainer accompanies the candidate as s/he performs whole-house dwelling needs evaluations in the four situations they will encounter in their field work (site-built homes, mobile homes, homes with gas heat, and homes with electric heat.) The purpose of Field Shadowing is to evaluate the candidate's competence in four main categories: information collection, health & safety, building assessment and evaluating data. Once a candidate demonstrates proficiency during Field Shadowing, they are awarded Kentucky Dwelling Needs Evaluator certification and approved to work as evaluators in the KY WAP.

Training and Certification Requirements for Quality Control Inspectors in the Kentucky WAP

Dwelling Needs Evaluator Certification

BPI Quality Control Inspector Certification

NEAT/MHEA, EA-Quip Software

Leakage, Envelope and Ducts (LED) class

Combustion Appliance Zone Safety (CAZ) class

Zonal Pressure Diagnostics (Zonals) class

ASHRAE 62.2-2016 class

Intro to WX online course (Mold & Moisture, Asbestos Awareness, KY WX Field Guide)

Lead Renovator Certification (RRP)

First Aid Certification

CPR Certification

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Training and Certification Requirements for Crew Leaders in the Kentucky WAP

All crew leaders must successfully complete the following training before working as a Crew Leader on a jobsite.

Crew Leader Training Course
Intro to WX online course (Mold & Moisture, Asbestos Awareness, KY WX Field Guide)

ASHRAE 62.2

Leakage, Envelope and Ducts (LED)

Combustion Appliance Zone Safety (CAZ) Class

Zonal Pressure Diagnostics (Zonals) Class

Lead Safe Weatherization Work Practices

Certified Lead Renovator (RRP)
First Aid

CPR

It is the responsibility of the service provider agency to train crew leaders or private contractors in Basic Blower Door usage and skills for using the blower door during material installation at client dwellings.

Training and Certification Requirements for Retrofit Installer Technicians (crew members) in the Kentucky WAP

All crew members must successfully complete the following training:

Retrofit Installer Technician Training Course (within 12 months of hire)

Lead Safe Weatherization Work Practices
Intro to WX online course (Mold & Moisture, Asbestos Awareness, KY WX Field Guide)

First Aid

CPR

Installer staff must work under the supervision of a crew leader unless they have completed all crew leader training requirements.

Training and Certification Requirements for Sub-Contractors (HVAC, Electrical, Plumbing and General Weatherization)

First Aid (required for all employees)

CPR training (required for all employees)
Lead Safe Weatherization Work Practices (required for all employees)

Certified Lead Renovator (RRP) (required for crew leaders)
Lead Safe Firm Certification
Intro to WX online course (Mold & Moisture, Asbestos Awareness, KY WX Field Guide)

ASHRAE 62.2 (required for anyone installing HVAC)

Contractors performing general weatherization work (and their employees) must attend comprehensive training for their job duties; installer staff must attend Retrofit Installer Technician training, Crew Leaders must attend Crew Leader training.

Technicians (Service Provider Staff or Sub-Contractors):

All technicians are required to be licensed in HVAC and electric. Technicians shall maintain their professional licenses in accordance with KRS 227A.010-150 for electric and KRS 198B.650-689 for HVAC, and meet all requirements regarding fees and continuing education.

KHC Monitoring Staff Required Certifications/Training Certificates:

Certified Dwelling Needs Evaluator

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Certified Lead Renovator (RRP)
Building Thermographer

Intro to WX online course (Mold & Moisture, Asbesto Awareness, KY WX Field Guide)
OSHA 30-Hour Construction Safety
Lead Safe Work practices
BPI Energy Auditor Certification

BPI Quality Control Inspector Certification

All certifications to be obtained within 6 months of hire.

Client Education

Client education is included as part of the energy audit and final inspection. The inspector conducts a client education segment as part of the initial inspection to assure that the occupants are fully aware of measures. This procedure is documented by using a signed receipt from the head of household which confirms that the information was not only distributed, but also explained. The "Checklist" form must be used to verify receipt and explanation of client education material. *Forms can be found on the Weatherization Assistance Program Resources page under the "Weatherization Forms" tab in the center of the page. Use this link, <https://www.kyhousing.org/Partners/Developers/Single-Family/Weatherization-Assistance/Pages/WAP-Resources.aspx>. This receipt is kept in the client file. A printable version of Preventing Carbon Monoxide Poisoning can be found here, https://www.epa.gov/sites/production/files/2015-08/documents/pcmp_english_100-f-09-001.pdf*

A printable version of, "What You Should Know About Space Heaters" can be found here, <http://www.hipspro.com/pubs/SpaceHeatSafety.pdf>

A printable version of "Combustion Equipment Safety" can be found here, https://www1.eere.energy.gov/buildings/publications/pdfs/building_america/26464.pdf

T&TA dollars are not used to fund client education.

Future Training Plan

Once Comprehensive training has been established, the training needed to address acute deficiencies, or any of the training listed above that does not fall under Comprehensive Training (Tier 4) as defined in WPN 15-4, will be considered Specific training. Specific training will be provided by KHC Staff, webinars, or other outsourced training providers.

At the request of the sub-recipients, KHC will continue regular meetings with CAA WAP program managers and staff. The meetings will serve the function of allowing CAAs a forum to share best practices, brainstorm innovative solutions to issues which create challenges for all and receive program administration updates from KHC.

KHC will continue to train all field staff to their JTA in order to meet the mandate of WPN 15-4. Our focus now is ensuring that all service providers have at least one person who has completed Crew Leader training or in training by the end of this program year. KHC has formed a Training Work Group comprised of WAP staff and other stakeholders to provide input on how best to expand training to installer staff. The Training Work Group will also explore new approaches to meeting the Comprehensive Training requirements of the Quality Work Plan for seasoned WAP staff.

KHC will host administrative technical assistance visits with each subgrantee. KHC will explore options of hosting virtual admin trainings throughout the year on areas such as program administration, financial management, and reporting.

Percent of overall trainings

Comprehensive Trainings:	65.0
Specific Trainings:	35.0

Breakdown of T&TA training budget

Percent of budget allocated to Auditor/QCI trainings:	50.0
Percent of budget allocated to Crew/Installer trainings:	50.0

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Percent of budget allocated to Management/Financial trainings:

V.9 Energy Crisis and Disaster Plan

Currently, Kentucky does not expend WAP funds under an energy crisis plan, but will take this issue under consideration.