

WAP Frequently Asked Questions

1. Q: Where can fuel prices and UPW factors be found?

A: Suggest using Energy Information Administration (EIA) data: [Homepage - U.S. Energy Information Administration \(EIA\)](#)

Eligibility and Intake

2. Q: Where can I find the Federal Poverty guidelines for this year?

A: The Federal Register publishes the Department of Health and Human Services' annual update notice for the poverty guidelines on their website www.federalregister.gov. The 2023 guidelines are here: <https://www.federalregister.gov/documents/2023/01/19/2023-00885/annual-update-of-the-hhs-poverty-guidelines>

3. Q: Is Supplemental Security Income included or excluded in eligibility determinations?

A: Pursuant to 10 CFR 440.3, income is excluded in WAP eligibility determination when a member of the family is receiving one of the following during the previous 12 months:

- Cash Assistance payments under Title IV–A, of the Social Security Act, also referred to in South Carolina as Aid for Families with Dependent Children (AFDC or welfare payments)
- Cash Assistance payments under Title XVI of the Social Security Act, also referred to as Supplemental Security Income (SSI)

Additionally, recipients of either or both of these benefits, are automatically eligible for WAP and these income sources must not be calculated when determining income eligibility and shall also not be included to calculate High Energy Burden status for Priority Points within the DBA system.

SSI is different than Social Security Disability Insurance (SSDI) and Social Security. SSI determination is based on age/disability and limited income and resources, whereas SSDI determination is based on disability and work credits and Social Security is based upon work history and age.

It is important to recognize that Social Security and SSDI payments should be used to calculate income for WAP eligibility determination and SSI is to be excluded.

4. Q: How can an applicant's disability status be verified?

A: The following documents serve as verification of disability:

- An award letter from Social Security that specifically mentions the client is disabled or is eligible for disability benefits
- A letter from Vocational Rehabilitation indicating the client is disabled

- A letter from Veteran's Affairs indicating the client is disabled

Disability can also be verified via the Beneficiary Notice Code (BNC) on the client's Social Security statement. If the 13-character BNC is followed by DI, DS, DC, DIB, DWB, CDB, HA, W, W1, or W6, this also serves as verification of disability even if the letter itself does not mention it.

Finally, if a client is receiving Supplemental Security Income (SSI) payments and is under 65 years old, this also serves as verification of disability.

Previous correspondence from OEO indicated an unexpired handicap parking decal or sticker with the client's picture could be used as proof of disability. This memo supersedes that correspondence. Handicap parking stickers or decals do **NOT** qualify as documentation of disability.

5. Q: If a client applies and is determined eligible, but an audit of their home reveals no weatherization work is needed, can the subgrantee count this as a completion?

A: 21-1 describes what must be done for a unit to be deemed an official DOE unit. [Weatherization Program 21-1: Program Year 2021 Weatherization Grant Application \(energy.gov\)](https://www.energy.gov/2021/01/21/21-1-program-year-2021-weatherization-grant-application) : A DOE Weatherized unit is: A dwelling on which a DOE-approved energy audit or priority list has been applied and weatherization work has been completed. As funds allow, the measures installed on this unit and paid for with DOE funds have a Savings-to-Investment Ratio (SIR) of 1.0 or greater, but also may include any necessary energy-related health and safety measures.

6. Q: What is the guidance on recertification of a client?

A: Once determined eligible for Weatherization Assistance, clients are eligible for one year, after which time they must be recertified for weatherization services to begin. Agencies should not take action to recertify a client until they are ready to provide weatherization services (client is next on the waitlist). When the agency is ready to provide weatherization services, they should contact the client and request proof of their income and energy burden (energy bill). If a client alleges their household size has decreased, verification is not required. If a client alleges their household size has increased, documentation of the new member's Social Security Number(s) as well as photo identification for new adult members is required. Clients should be given a reasonable opportunity to provide this information (ten business days). If the client does not provide this information, the agency can move to the next client on the waitlist.

Fiscal Considerations

7. Q: What are the SIR thresholds needed to install Energy Conservation Measures?

A: **Department of Energy Funds**

Per the South Carolina Weatherization Assistance Program State Plan, in order to spend any Department of Energy (DOE) money on an ECM, the cumulative SIR of the dwelling must be 1.0 or higher. In addition, DOE money can only be spent on measures that also have an SIR of 1.0 or higher. The lone exception to this is blower door guided air sealing which includes general air

sealing or window sealing. These measures can be paid for with DOE funds with an SIR of less than 1.0 so long as the cumulative SIR is 1.0 or greater.

LWAP and DOE Funds

Per the South Carolina LIHEAP State Plan and the Weatherization Policies and Procedures Manual, LWAP is not subject to the DOE SIR standards. LWAP funds can be spent on measures with an SIR of 0.5 or greater. To combine LWAP and DOE funds on ECMs, the cumulative SIR of the dwelling must be 1.0 or greater.

LWAP Only

If the cumulative SIR of a dwelling is below the 1.0 threshold, it may still be completed using LWAP funds provided the cumulative SIR is 0.5 or greater. OEO reminds subgrantees that reaching the DOE annual quota should be the top priority, so weatherizing homes using only LWAP funds should be done sparingly.

8. Q: How should ECM measures in NEAT/MHEA with an SIR less than .5 be funded?

A: In the NEAT/MHEA program, some measures will show up as ECMs even if their SIR is less than 0.5. Despite their presence on the ECM list, the rules related to SIR thresholds must be followed. If ECMs appear with an SIR of less than 0.5, they must either be installed as Health and Safety measures (if allowable – review most recent Health and Safety Plan) or removed from the audit.

9. Q: Which measures are allowed to be done with DOE money and below a 1.0 SIR?

A: Pursuant to Weatherization Program Notice 19-4, released January 17, 2019:

All weatherization measures must be “cost effective” as defined by DOE, except for the cost of measures to eliminate health and safety (H&S) hazards that meet the Grantee’s approved H&S plan. “Cost effective” means that each measure and package of measures installed in a dwelling unit must have a savings-to-investment ratio (SIR) which meets or exceeds 1.0. There is a single exception: blower door guided air sealing may have an SIR less than 1.0, if the cumulative SIR of the package of measures is equal to or greater than 1.0, not including H&S measures.

DOE funds can be used to pay for air sealing measures with an SIR of less than 1.0 provided the collective SIR of all the ECMs is 1.0 or greater. WPN 19-4 does not impact the SIR parameters needed to leverage LWAP funds for ECMs. Please refer to the South Carolina Weatherization Assistance Program State Plan, South Carolina Weatherization Assistance Program Policy and Procedures Manual, and the Weatherization Assistant User’s Manual regarding LWAP SIR parameters.

10. Q: Does duct sealing count as part of blower door guided air sealing?

A: Duct sealing is a standalone energy conservation measure as is Air Sealing. Window sealing would be considered ‘blower door guided air sealing’, but duct sealing would not be.

Thus, window sealing could be completed with DOE money even if the measure SIR is less than 1.0 provided the cumulative SIR was 1.0 or greater. Meanwhile, duct sealing does not meet this exception and could not be completed with DOE money if the SIR is less than 1.0., because air sealing and H&S measures are the only measures that do not require a measure SIR of 1.0.

11. Q: Per WPN 17-7, is a dwelling required to have DOE money spent on an ECM and not just on health and safety measures? For example, if the ECMs were paid for with entirely LWAP funds, and DOE money was used only on health and safety, would this result in disallowed costs for the money spent on health and safety?

A: For the unit to still be counted as a DOE unit where H&S funds were applied, at a minimum one ECM must have DOE funds applied to it.

12. Q: Can DOE funds be spent to pay for a QCI if the subgrantee does not have a QCI on staff?

A: Yes, DOE funds can be used to bring in outside QCIs to final inspect where the local agency, or Grantee, does not have a certified QCI on staff. The initial Energy Audit can also be contracted out.

13. Q: What can Training and Technical Assistance Funds be used for?

A: T&TA funds may also be used to train contractors at the Subgrantee level participating in the Program. In making the determination to pay for contractors' training, Grantees and Subgrantees should secure a retention agreement in exchange for the training. The retention agreement should require that contractors will work in the Program for a specific amount of time that equates to the value of the costs associated with the T&TA provided.

T&TA funds can be used for travel and per-diem. Please utilize General Services Administration (GSA) rates when calculating costs. In addition, note that retention agreements are required for all contractors that are trained.

Please refer to the South Carolina Weatherization Assistance Program Policy and Procedures Manual Section 503 for additional required trainings for contractors hired by the subgrantee for the weatherization program.

14. Q: Subgrantees will need to contract with a home inspection company or city/county inspector in order to conduct the inspections for the work done with the WRF allocation. How can they pay for these inspections?

A: Subgrantees can use WRF funds for these fees. It is a cost related to completed repair work to prevent deferral.

Installation and Technical

15. Q: Can subgrantees 'replace' bulbs in empty sockets? For example, if a fixture has room for four bulbs, but two of the bulbs have inefficient lights and the other two are empty.

A: In the instance that a fixture has two sockets where only one existing bulb in place, model the replacement bulb with the wattage of two bulbs (e.g., single LED bulb of 7w would be

modeled as 14w to consider two bulbs replacing the existing 60w). If a four-socket fixture is existing where two are missing, do the same for each replacement bulb, double the wattage. A more in-depth guide on NEAT/MHEA modeling is available as a PowerPoint below.



Modeling Missing
Broken Light Bulbs.pp

16. Q: If a fixture has no working light bulbs, could the agency provide light bulbs to the client in bulk (as we do with air filters) and classify those as a health and safety measure?

A: Unfortunately, leaving bulbs is not permissible as a H&S measure.

17. Q: Is a Manual J required for min-split HVAC systems? Related to this question, would it depend on the number of 'heads' that are installed? Based on my review of the SWS, I believe a Manual J is still required, but wanted to confirm.

A: Correct, proper sizing by the applicable standard is required.

18. Q: What is the best way to calculate the KW or BTUs used by the parts that are working on a system that overall does not work? For example, in a situation where an agency is auditing a home with radiant heat in the ceiling in each room, the systems do not work in each room, there are two space heaters, and there is no data plate.

A: You may turn one of the functional ones on and get an Amp reading from the panel box and convert that to KW or BTUs. Assuming the space heaters are located where the radiant heat is not working, those included in the model would make up for what is not working/existent.

19. Q: In situations where a hook up for a dryer exists, but a dryer is not present, what weatherization work should be performed? Can a dryer vent be replaced? Should the hole be sealed?

A: Replacing the vent termination that is in disrepair would not be a red flag. However, replacing the vent termination and including all ducting to a nonexistent appliance would be a red flag. Removing the vent termination and sealing the hole would be acceptable too. If completing the latter, communication with the client is recommended prior to sealing.

20. Q: If a client has multiple bathrooms and states they do not use one, should the agency still install a bathroom fan?

A: You do not need to install a bathroom fan, however just like the primary bathroom (for use) and/or kitchen, if one is not installed the ASHRAE 62.2 calculation will make up the ventilation deficit and potentially add it to the continuous requirements. An accurate entry into the RED CALC algorithm will ensure the proper number of fans are installed.

21. Q: Can agencies replace gas stoves?

A: DOE has confirmed replacement of gas stoves is an allowable health and safety expense. These should be paid for with LWAP money.

22. Q: If a client states they do not use a combustion appliance (for example a stove), should the appliance still be vented?

A: Unless decommissioning the combustion appliance, it should be properly vented.

23. Q: In a situation where a client has a home with no primary heat source, no ductwork, and is using an unvented propane gas space heater and a propane stove, would installation of an electric heat pump (using LWAP funds) be considered fuel switching?

A: This would be considered fuel switching (based on the primary fuel type they are receiving assistance for) but being you are using LWAP funds, DOE rules and approvals would not apply for that specific fuel switch. If you are using DOE funds on the job all measures receiving DOE funding will need to meet DOE requirements including client eligibility, cumulative SIR, etc.

24. Q: Can subgrantees install magnetic dryer vent couplings provided they are UL 2158 compliant?

A: We have received word from the SWS committee that SC may use the Magvent product for dryer venting and that no further review or DOE approval is needed at this time.

25. Q: If the client does not wish for a health and safety measure to be installed and cannot be convinced otherwise after ECMs are installed, what are our options?

A: In this instance, please document all attempts made to install H&S measures, up to the client signing off on the refusal with the known H&S issues if not completed, and then closing the job out. Please also remind the Subgrantee to fully educate the client on the activities at time of the energy audit which may impact their home. Ensure the client up front is fully aware and acknowledges that some of the activities do require drilling into surfaces on the home.

26. Q: Would Google Nest or other types of wi-fi thermostats would be beneficial in a situation where a client has an accessibility need related to a visual impairment? What is the process for gaining approval for those?

A: Thermostats are part of attachment A Boiler/Furnace Control Systems. However, it is not specified as to the type that must be used, so any type could be used and included as part of the overall expense of installing an ECM.

27. In a situation where the SIR is below 1.0, or there is very little space under the mobile home and the network is unsure if they will be able to install the measure, is there a way it may be permissible if the belly insulation ECM were skipped, such as if the home was weatherized with all LWAP funds?

A: DOE does not comment on the use of LWAP funds, but for DOE funds it would hold true that if modeled for an efficiency improvement and if called for, skipping it would not be allowed. South Carolina could build in a review and approval process where the case-by-case scenario is

submitted to your office for review to determine if the dwelling is still receiving comprehensive weatherization.

Contractors

28. Q: Can contractors subcontract out a specific service? This does not violate any state procurement laws, but I wanted to make sure it did not violate any DOE regulations either.

A: Yes, contractors may subcontract out work. Please note that it must be allowable in the contract that the subgrantee has with the contractor and all requirements included in the policy and procedures for the state, subgrantee and DOE. Liability and expectations flow down to the final subcontractor.

29. Q: For subgrantees that cover a large area of the state, the contractors they hire may have to drive a few minutes to a work site or several hours. Are they allowed to pay them more when they drive further? And since this additional payment could impact the SIR of a home, is there anything the subgrantee can do to limit the impact of this additional payment on the SIR?

A: Trip charges would not be needed in the cost of the measure for energy modeling. These are support costs that can be separate and reimbursed. Recommend some type of cost control oversight. Depended on the contractual language, contractors would either need to have their contracts amended to provide a trip charge cost for all jobs, or if the contractor bids each individual job begin including trip charge estimates.

30. Q: When multiple contractors are performing work on a house and one is finished, can they be paid if the other still has work to do?

A: Grantees may pay contractors when their work is completed and if it is deemed satisfactory by a final inspector. This would allow for multiple inspections which would provide the verification needed to pay contractors for work prior to the project being completed. The project cannot be reported as complete until all the work is completed and final inspected.

31. Q: When a contractor installs a new appliance and removes the old one (for example an aged and inefficient refrigerator), what are they required to do with it?

A: WPN 17-7 – Table of Issues requires that hazardous waste materials generated during weatherization work shall be disposed of according to all local laws, regulations and/or guidelines, as applicable. This would include refrigerant. Please review your Field Guide and/or the SC Policy and Procedures Manual re: any program guidance for this topic. Contractors must dispose of appliances that are removed from client homes in accordance with local code and environmental waste management guidelines.

Vapor Barrier

32. Q: For site-built homes with tiny crawlspaces (less than two feet in height), can weatherization measures be installed in the home if it is not feasible to install a vapor barrier? For example, if the home was too 'tight' and the crawlspace would be more likely to grow mold with it added.

A: Potentially yes. SC will need to define at what point will a deferral be necessary given site conditions. There are multiple factors to consider like restriction (as you mentioned less than 24”), existing moisture issues, Ft2 of exposed earth that would be left in place.

33. Q: The vapor barrier supplier for one of our subgrantees indicated they will be updating their inventory to comply with the updated International Code for vapor barrier requirements in crawlspaces. Their email referenced ASTM 1745 and indicated the vapor barrier mil requirement was changing from 6 mil to 10 mil. Our current P&P manual reads as follows for vapor barrier requirements: *‘When a vapor barrier is being selected, it must meet International Residential Code (IRC) requirements. This means it must be a Class I vapor retarder rated at 0.1 perms or less. It must also be dark in color and puncture resistant with a thickness of at least 6 mil’*

The SWS (2.0202.3c) still has 6 mil as the minimum requirement. Do we need to go by the SWS, or should we update our manual based on the ASTM changes?

A: You would continue to go by the SWS. Please remember that 6 mil is the minimum, so the subgrantee could use 10 mil as that would be thicker if that is all the subgrantee can get. The subgrantee could also try to obtain the 6-mil product from another vendor.

34. Q: Would the installation of a vapor barrier would need to be an incidental repair if belly or floor insulation was installed as an ECM?

A: Vapor barrier does not have to be an incidental measure. It should be listed as a Health and Safety item. The reason it is a H&S item and not an incidental item is because it does not have to be installed to insulate the belly or floor of a home but is installed to prevent moisture from entering the home.

Mobile Home Skirting

35. Q: Is there any option to complete Mobile Home Skirting as an IRM, a health and safety measure or even as a WRF project?

A: Mobile home skirting is not an allowable expense with DOE funds. Mobile home skirting installation or repair must only be done as an IRM related to belly insulation and paid for with LWAP funds. However, Subgrantees should consider the cumulative Savings to Investment Ratio (SIR) of the dwelling when deciding to install or repair skirting as an IRM.

36. Q: If a mobile home does not have skirting, can it be deferred since subgrantees cannot use DOE funds to repair it?

A: Skirting is not required to weatherize a mobile home and lack of skirting alone is not sufficient reason for deferral.