



Department of Energy
Washington, DC 20585

WEATHERIZATION PROGRAM NOTICE 15-4
EFFECTIVE DATE: October 21, 2014

SUBJECT: Quality Work Plan Requirement Update

PURPOSE: This guidance provides updates to WPN 14-4 issued December 2, 2013. This guidance supersedes 14-4 and describes requirements to support and verify quality work in the Department of Energy's (DOE) Weatherization Assistance Program (WAP). It defines what constitutes a quality installation of weatherization measures, outlines how those measures are inspected and validated, and prescribes acceptable training and credentialing of workers.

The requirements outlined in the five sections of the Quality Work Plan (QWP) listed below reflect aspects included in the 2014 and 2015 Grantee Application submission process. The following are the substantive updates to the 14-4 guidance as reflected in WPN 15-4:

- **The option to request a variance for a specific specification in the Standard Work Specifications (SWS).**
- **Adjustment of the dates for implementation in several sections of the guidance.**
- **Clarification of the training expectations for Quality Control Inspectors working in multifamily buildings.**
- **Clarification of the expectations regarding Tier 1 training.**
- **Updating the resources available to Grantees for implementation of the guidance.**

SCOPE: The provisions of this guidance apply to Grantees applying for financial assistance under the DOE WAP.

LEGAL AUTHORITY: Title IV, Energy Conservation and Production Act, as amended, authorizes the DOE to administer the WAP (42 U.S.C. § 6861, *et. seq.*). All grant awards made under this program must comply with applicable laws and regulations including the WAP regulations contained in 10 CFR 440.

BACKGROUND: 10 CFR 440.12(b)(6) requires each Grantee application to include a monitoring plan which must indicate the method used by the Grantee to ensure the quality of work and adequate financial management control at the subgrantee level.

Pursuant to the above section, the DOE WAP instituted a QWP starting in December 2013 that established benchmarks for energy efficiency retrofits in the Program.

The QWP defines specifications for work quality, workforce training and the qualifications required for individuals performing inspections of WAP work.

GUIDANCE:

Section 1: Definition of Work Quality, Guidelines and Standards

Section 2: Communication of Guidelines and Standards

Section 3: Inspection and Monitoring of Work Using Guidelines and Standards

Section 4: Training to Implement and Maintain Guidelines and Standards

Section 5: Exemptions

Section 1 Definition of Work Quality Guidelines and Standards

Justification The State Plan Application identifies the Type of Work to Be Done. This includes “Technical Guides and Materials” – and items such as standards documents, program updates, procedures manuals, field guides and other materials used to direct work in the field.

Requirement All measures and incidental repairs performed on client homes must meet the specifications, objectives and desired outcomes outlined in the (SWS) for Home Energy Upgrades.

- Grantees will make available to subgrantees comprehensive field standards outlining Grantee expectations of work scope and quality. These field standards must meet or exceed the minimum standards outlined in the SWS.
- Grantees must revise their field guides and ensure that the relevant procedures in those guides will result in work that achieves the desired outcomes in the SWS. Field guides will reference the appropriate SWS for the procedure being described and clearly state the required specifications for that procedure.
- A variance may be requested for individual specifications by submitting a SWS Variance Request Form to the DOE Project Officer for review and approval. A link to this form can be found on EERE Clearinghouse webpage referenced in the “Resources” section of this document.
- Tasks that are not listed in the SWS are not subject to this requirement.

Time Line Program Year 2014

Grantees will submit to DOE an implementation plan for complying with all components of this section by Program Year 2015.

Ninety days prior to the beginning of the Grantee's 2015 Program Year, Grantees will submit completed field guides and standards as well as any variance requests to their DOE Project Officer for review.

Beginning of Grantee's Program Year 2015

Grantees will distribute field guides and field standards that conform to the SWS to all subgrantees and direct hire contractors.

Section 2 Communication of Guidelines and Standards

Justification DOE will pay particular attention during its program monitoring to agreements, procedures manuals, and other relevant materials to ensure Grantees have informed subgrantees of the expectations for work quality.

Requirement Grantees must provide subgrantees and/or contractors with technical requirements for field work including: audits/testing; installation of energy conservation, health and safety and incidental repair measures; and final inspections. The Grantee must confirm receipt of those requirements and provide follow-up and clarification upon request. A signature on a contract can serve as proof of receipt. The technical requirements must be clearly communicated and the specifications for work to be inspected must be referenced in subgrantee contracts. Contractors hired by the subgrantee must have agreements that include the same technical requirements referenced above. The work of the contractor must be consistent with the Grantee standards and field guides. The goal is to ensure:

- The Grantee is implementing work quality standards that align with the SWS.
- All subgrantees staff, contractors, and anyone doing the actual work are aware of these standards.
- Every home is inspected to ensure compliance with the requirements of the SWS.

Time Line **Immediately**
All subgrantee agreements and vendor contracts, active in Program Year 2015 and beyond, will contain language which clearly documents the specifications for work as outlined in this section.

Section 3 Inspection and Monitoring of Work Using Guidelines and Standards

Justification A component of the Weatherization Assistance Program Grantee Plan must include Grantee procedures for "Final Inspection" in Section V.5.

Requirement **Quality Control Inspector:**

Quality Control Inspectors (QCI) working for, or contracted by, the WAP must possess the knowledge, skills and abilities in the National Renewable Energy Laboratory (NREL) Job Task Analysis (JTA) for Quality Control Inspectors. This applies to all individuals who perform an evaluation and sign off on work performed in homes, including final inspectors and Grantee monitoring staff.

Single Family:

- QCI competency is demonstrated by certification as a Home Energy Professional Quality Control Inspector.
- QCIs can be employed by third party organizations or subgrantees; however, the Grantee is ultimately responsible for ensuring that every completed unit reported to DOE meets the quality guidelines required by the WAP.
- The Grantee must provide in their Grantee Plan a policy for validation of the QCI credentials.
- The Grantee must have policies and procedures in place to address situations where a QCI is not inspecting units using the standards adopted by the Grantee and consistent with the SWS. The policy must include monitoring of the QCI and procedures for disciplinary action if the Grantee inspection protocols are not followed.

Multifamily:

- Grantee Training Plans must include requirements to ensure that QCIs working in multifamily buildings attend, and receive a successful evaluation from a training program delivering a curriculum based on the NREL Multifamily Quality Control Inspector JTA.

Quality Control Inspection:

Every DOE WAP unit reported as a “completed unit” must receive a final inspection ensuring that all work meets the minimum specifications outlined in the SWS in accordance with 10 CFR 440.

- Units must be inspected using criteria that align with the quality specifications outlined in Section 1 of this guidance.
- Every client file must have a form that certifies that the unit had a final inspection and that all work met the required standards. The form must be signed by a certified QCI. If a unit has received both a final inspection and has also been monitored by the Grantee, two certification forms will be available in the client or building file - one for each inspection.
- The Quality Control Inspection must include an assessment of the original audit and confirm that the measures called for on the work order were appropriate and in accordance with the Grantee audit procedures and protocols approved by DOE.

- Grantee Quality Control Inspection policies can be developed in the following ways:
 - DOE Prescribed QCI Policy: DOE has developed two standard options for administering quality control inspections:
 - Independent QCI: The QCI is an individual that has no involvement in the prior work on the home either as the auditor or as a member of the crew. The Grantee or a DOE-approved representative (for example, a certified QCI employed by a third-party) must perform quality assurance reviews of at least 5 percent of all completed units.
 - Independent Auditor/QCI: The Auditor performs the audit, creates the work order, and performs the final quality control inspection. The auditor is not involved in any of the actual work on the home. Because this model does not allow for an independent review of the audit on every home, the Grantee must increase their percentage of quality assurance reviews to ensure that audits are being performed consistently and correctly. The Grantee must perform quality assurance reviews of at least 10 percent of all completed units. The final percentage of inspections will be defined by the Grantee and justification provided to DOE supporting the final number. The Grantee must also develop a quality assurance plan that ensures that the individual who is functioning as both the auditor and the quality control inspector is able to consistently perform both tasks.
 - Grantee-Developed Quality Control Inspection Policy: The Grantee may choose to develop a quality control inspection policy that differs from the standard options defined by DOE. The policy must be presented to the DOE Project Officer for approval and must contain the following elements:
 - Description of the relationship between the individuals performing the quality control inspections to the work - i.e. are they independent, did they audit the home, did they work on the crew etc.
 - Grantee process for ensuring that quality control inspections are performed in an impartial and complete manner. This must include audit review as described above.
 - Grantee process for reviewing the success of the Quality Control Inspection policies and resolving any issues that affect the quality and impartiality of the inspection process.

Time Line**2014 Grantee Plan**

Grantees must develop a training plan to ensure that there are sufficient certified individuals available to meet the requirements of this Section.

Beginning of Grantee's Program Year 2015

All units reported to DOE as completed will be inspected to ensure compliance with the specifications in the SWS.

All quality control inspections, including monitoring inspections, must be conducted and signed off by a certified QCI as outlined in this section.

Section 4 Provide Training to Implement and Maintain Guidelines/Standards

Justification Pursuant to Section V.8.4 of the Grantee Application Package submission, Grantees must submit a proposed training plan with milestones to ensure the training plan is on pace to be accomplished. The Grantee Application submission instructions provide elements that should be addressed as part of the submission. These include how the Grantee training plan reflects feedback from DOE Project Officer visits and Grantee field monitoring visits. In 2014 and 2015, this list will be expanded to include items outlined in this section.

Requirement Beginning in Program Year 2014, Grantee training plans must include comprehensive training for all WAP workers that is aligned with the NREL (JTA) for the position in which the worker is employed.

- Training Plans must address two distinct categories:
 1. **Tier 1 Training:** Comprehensive, occupation-specific training which follows a curriculum aligned with the JTA for that occupation. Tier 1 training must be administered by, or in cooperation with, a training program that is accredited by a DOE-approved accreditation organization for the JTA being taught.
 2. **Tier 2 Training:** Single-issue, short-term, training to address acute deficiencies in the field such as dense packing, crawlspace, ASHRAE, etc. Conference trainings are included in this category.
- Training Plans must ensure that all Weatherization field staff receives regular Tier 1 training. Each Grantee will decide on the regularity of training based on workforce needs and availability of funds. The training plan should include an analysis of training needs and a plan for meeting those needs over a defined period of time, which can span multiple Program Years.
- Tier 2 training can be provided on an as-needed basis, however, the majority of worker training should occur in Tier 1.

Time Line 2014 Grantee Plan

Grantees must provide a Grantee training plan to ensure that all training meets the requirement outlined in this section. All DOE funded Tier 1 training will be provided by DOE-approved accredited training programs. Accredited training can be administered in a number of ways including traveling training programs, distance learning programs and other options approved by DOE.

Beginning of Grantee's Program Year 2015

All Tier 1 training paid for with WAP T&TA funds must meet the requirements of this section.

Section 5 Exemptions**Programs which do not install envelope measures:**

The state of Hawaii and US recognized territories must submit an alternate training and evaluation plan to ensure that the individuals performing quality control inspections in these locations are adequately trained and skilled to inspect in accordance with the SWS. Grantees should work with the DOE Project Officers to ensure that all aspects of the training plan meet the overall intent of this WPN.

Resources

Further information to carry out the requirements set forth above can be found in the following links or by contacting the U.S. Department of Energy Weatherization Assistance Program, wapinfo@nrel.gov (Please use the subject line: Quality Work Plan):

- The Standard Work Specifications for Home Energy Upgrades for Single Family, Manufactured Housing, and Multifamily Homes
<http://sws.nrel.gov>
- The IREC ISO 17024 Accreditation Program for Energy Efficiency Training Programs <http://www.irecusa.org/credentialing>
- The NREL Job Task Analysis for Quality Control Inspector
<http://www1.eere.energy.gov/wip/pdfs/51670.pdf>
- Home Energy Professional Quality Control Inspector Certification
<http://www.bpi.org>
- The NREL Job Task Analysis for Multifamily Quality Control Inspector
<http://www.nrel.gov/docs/fy14osti/60537.pdf>
- A list of accredited training providers, including the JTAs for which they are accredited
http://www2.eere.energy.gov/wip/guidelines_accredited_training.html
- The WAP Training and Technical Assistance Clearinghouse will provide a central location to access materials and resources related to the Quality Work Plan
http://www.eere.energy.gov/wip/guidelines_quality_work_plan.html

Grantees with specific questions related to this Guidance should contact their DOE Project Officer.

A handwritten signature in black ink that reads "Anna Maria Garcia". The signature is written in a cursive style with a large initial 'A' and 'M'.

AnnaMaria Garcia
Program Manager
Office of Weatherization and Intergovernmental Program
Energy Efficiency and Renewable Energy