



Department of Energy
Washington, DC 20585

WEATHERIZATION PROGRAM NOTICE 19-5

EFFECTIVE DATE: September 6, 2019

SUBJECT: WEATHERIZATION ASSISTANCE PROGRAM INCIDENTAL REPAIR MEASURE GUIDANCE, INCLUDING: WINDOWS, DOORS, & ROOFS

INTENDED AUDIENCE: Grantee Program Managers, Grantee Technical Managers, Subgrantee Program Directors, Subgrantee Technical Managers, Subgrantee Quality Control Inspectors, Subgrantee Energy Auditors, Weatherization Training Centers

PURPOSE: To clarify guidance relating to incidental repair measures (IRM) allowable under the Department of Energy (DOE) Weatherization Assistance Program (WAP) including allowability of window, door, and roof repairs and replacements.

SUPERSEDES: Weatherization Program Notice (WPN) 19-5 supersedes WPN 12-9 and WPN 12-9 FAQ.

SCOPE: The provisions of this guidance apply to all Grantees applying for financial assistance DOE's 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 shall comply with applicable law and regulations including the WAP regulations contained in [Code of Federal Regulations \(CFR\) Title 10, Chapter II, Subchapter D, Part 440](#).

BACKGROUND: DOE has identified inconsistencies in Grantee interpretation of DOE policy concerning the classification of an IRM. The following statutory provisions and regulations apply to IRMs, including roof repairs and window or door repair and replacements:

- Per [42 U.S.C. § 6861\(b\)](#) the weatherization program's purpose is "...to increase the energy efficiency of dwellings owned or occupied by low-income persons, reduce their total residential energy expenditures, and improve their health and safety..."
- [10 CFR 440.3](#) defines *Incidental Repairs* as "...those repairs necessary for the effective performance or preservation of weatherization materials. Such repairs include, but are not limited to, framing or repairing windows and doors which could not otherwise be caulked

or weatherstripped and providing protective materials, such as paint, used to seal materials installed under this program.”

- [10 CFR 440.21\(d\)](#) states further that “[e]xcept for materials to eliminate health and safety hazards allowable under §440.18(c)(15), each individual weatherization material and package of weatherization materials installed in an eligible dwelling unit must be cost-effective...[and] must result in energy cost savings over the lifetime of the measure(s)...”

Grantees and Subgrantees are reminded that the WAP is not a rehabilitation or general repairs program. This guidance strictly prohibits stand-alone roof replacements, structural repairs, or other non-energy related rehabilitation work. Units requiring this type of repair should be referred to a rehabilitation program or the Subgrantee must use other sources of funding to cover these costs. The IRM category is reserved for repairs that are not part of an Energy Conservation Measure (ECM), but are necessary to protect a newly installed ECM.

DEFINITIONS: The following terms used in this guidance apply to the entire WAP and can be referred to with respect to other related Program Notices:

Ancillary Items – Items necessary for the proper installation of weatherization materials as required by materials manufacturers, general construction, and/or WAP field standards to achieve a finished product in a typical installation where no unusual or extensive repairs are needed. Ancillary items typically refer to small items such as hardware, fasteners, adhesive, sealant, etc. The costs of ancillary items and their installation shall be included within the cost of an individual ECM when calculating the SIR for the individual ECM. For questions related to material standards for ancillary items, see the most recent Guidance on the topic ([WPN 19-4, Attachment 7](#) at the time of this writing).

Energy Conservation Measure (ECM) – Installation procedure performed for its anticipated energy savings. ECM costs must include all material, labor, and *ancillary items* and must meet a Savings to Investment Ratio (SIR) of 1.0 or greater to be installed with WAP funds.

Health and Safety (H&S) Measure – The actions taken to eliminate a health and safety hazard, the elimination of which is *necessary* to effectively perform weatherization work, *or* the actions are necessary as a result of weatherization work. H&S measures do not have to be cost-justified by the audit and are not considered in the SIR calculation or the Average Cost per Unit (ACPU) if the Grantee has a separate health and safety budget cost category. Grantees must identify H&S procedures and provide rationale for the percentage of total Program costs involved as a part of their DOE approved annual plan. For questions related to specific H&S issues and allowability, refer to the most recent Health and Safety Guidance ([WPN 17-7](#) at time of this writing).

Incidental Repair Measure (IRM) – A repair necessary for the effective performance or preservation of newly installed weatherization materials, but not part of a standard installation. IRM installations must be associated with a specific ECM or group of ECMs. IRMs must be justified by written and photo documentation in the client file. IRM costs must be included the SIR calculation of the total package of weatherization measures.

Package of Weatherization Measures – The cost of all ECMs and their associated IRMs included in an audit or priority list and/or installed in a home. The cost of each ECM includes the cost of its ancillary items. The cost of all IRMs is added to the cost of the package of weatherization measures when calculating the total package SIR for the whole project. H&S measures do not have to be cost-justified by the audit and are not considered in the SIR calculation or the ACPU if the Grantee has a separate H&S budget cost category.

Savings to Investment Ratio (SIR) – Result of dividing the present worth of the lifetime energy cost savings by the total present worth cost of the installed measure, including the discounted rate of the savings and fuel escalation rates. Each ECM must yield a SIR ratio of 1.0 or greater to be included in the *package of weatherization measures*, and the total package of weatherization measures must yield a cumulative SIR of 1.0 or greater to be allowable expenditures of WAP funds.

GUIDANCE: The primary goal of the Weatherization Assistance Program is “...to increase the energy efficiency of dwellings owned or occupied by low-income persons...” IRMs must be limited to those *minor repairs* necessary for effective performance or preservation of energy conservation measures installed by the Subgrantee. WAP funds shall not be used to install IRMs solely to protect existing materials in the dwelling.

DOE policy relating to the inclusion of IRMs in the package of weatherization measures is summarized as follows:

- Justification for the cost of each IRM and why it is necessary for the effective performance or preservation of an ECM must be documented in the client file with photos and written explanation.
- The total cost of the *package of weatherization measures* including any IRMs must have a calculated SIR of 1.0 or greater.

For questions related to instances where necessary IRMs bring the SIR of the total package of measures below 1.0, or issues related to “measure skipping” see the most recent Guidance on the topic ([WPN 19-4, Attachment 8](#) at the time of this writing).

ROOF REPAIRS: Roof repairs in and of themselves are not ECMs. Roof repairs are allowable as IRMs to preserve the integrity of the associated ECM(s), when they meet the definition and requirements of the IRMs listed above. Additional roof repair details are as follows:

1. Roof repairs are allowable as a H&S measure, if:
 - a. It resolves a bulk water intrusion issue that is the cause of visible biological growth, and;
 - b. The Grantee's Annual Plan *identifies* minor roof repair as an H&S measure, and *defines* it with a monetary or other (e.g., square footage) limitation, and;
 - c. The H&S roof repair is well documented with written explanation and photos of the biological growth in the client file.
2. Roof repairs are only allowable as an *ancillary cost* to an ECM that would *typically* require such a repair as a part of the ECM installation, such as roof mounted solar or ceiling/roof insulation.

WINDOW AND DOOR REPAIRS: Window and door repairs are allowable as IRMs to preserve the integrity of the associated ECM(s), when they meet the definitions and requirements of IRMs listed above. Additional window and door repair details are as follows:

1. Window or door repairs are allowable as a H&S measure, if:
 - a. It resolves a bulk water intrusion issue that is the cause of visible biological growth, and;
 - b. The Grantee's Annual Plan identifies Window or Door repairs as an H&S measure, and;
 - c. The H&S Window or Door repair is well documented with written explanation and photos of the biological growth in the client file.
2. Window or door repairs are only allowable as an *ancillary cost* to an ECM that would *typically* require such a repair as a part of the ECM installation.

WINDOW AND DOOR REPLACEMENTS: Window and door replacement(s) must first be modeled and treated as ECM(s) if cost justified. Window and door replacements shall not be included in the air sealing ECM. Window and door replacements are allowable as IRMs to preserve the integrity of the associated ECM(s), when they meet the definitions and requirements of IRMs listed above.

IRM costs for any measures that do not meet the definitions set forth in regulating language and this WPN are subject to being questioned and potentially disallowed costs.

DOE encourages Grantees to consider the use of alternative funds for these measures when possible.

CONCLUSION: Incidental repairs have always been part of the Weatherization Program and when appropriately included as outlined in this guidance will further the Program's energy saving mission and ensure the effective use of WAP funds.

Grantees shall begin the process of implementing this guidance with their Project Officer with all necessary actions completed prior to the beginning of Program Year 2020.



AnnaMaria Garcia

Director

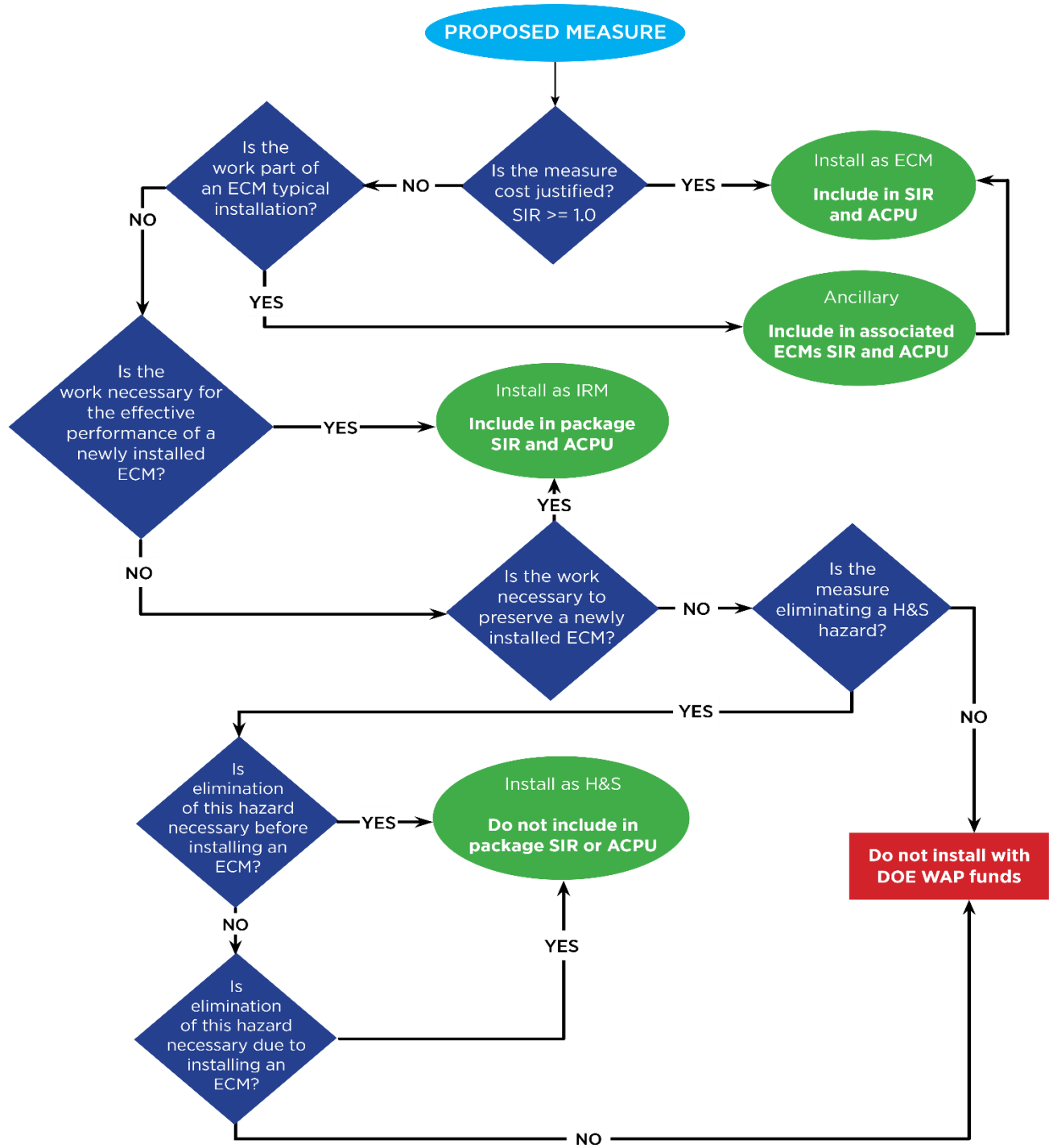
Office of Weatherization and Intergovernmental Program

Energy Efficiency and Renewable Energy

Attachment 1 - WPN 19-5 Definition Flow Chart

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The decisions relating to measure categorical classification are complex and it is difficult to predict all the potential items that may be considered in a Weatherization Assistance Program project. The following flow chart was developed to assist Grantees in properly categorizing measures within Department of Energy guidance.



ACRONYMS

ACPU: Average Cost Per Unit
ECM: Energy Conservation Measure
H&S: Health & Safety

IRM: Incidental Repair Measures
SIR: Savings to Investment Ratio