



# West Virginia Weatherization Assistance Program

State of West Virginia  
Development Office

**PART I - MASTER FILE**  
**PY 2018 - 2019**



# State of West Virginia Development Office

## U.S. Department of Energy Program Year: 2018-2019 State Plan Master File

### V. MASTER FILE

#### V.1. Eligibility

The West Virginia Weatherization Assistance Program (WV WAP) will ensure that every dwelling weatherized meets both client eligibility and building eligibility requirements as detailed in *Sections V.1.1* and *V.1.2*.

#### V.1.1 Approach to Determining Client Eligibility

##### **Definition of Income Used to Determine Eligibility:**

The WV WAP will determine eligibility of a dwelling unit based on the amount of household income and the conformity of that income to criteria established by the Low-Income Home Energy Assistance Act of 1981, 42 U.S.C. 8621. All subrecipients in the WV WAP will use 200% of the poverty guidelines and definition of poverty as stated in DOE WPN 18-3 Poverty Income Guidelines and Definition of Income, dated February 21, 2018, and published in the Federal Register January 18, 2018 as updated by the U.S. Department of Health and Human Services under the authority of 42 U.S.C. 9902(2). The WV WAP data management system calculates a twelve (12) month income period needed to create an annualized income equivalent for comparison to the poverty guidelines. Annualized income may be calculated using less than twelve (12) months of income information. At least one (1) month of recent income is necessary for the database management system to calculate the annualized income for eligibility determination. In addition, family units that have received cash assistance payments under Title IV or XVI of the Social Security Act, or applicable State or local law paid during the twelve-month period preceding application, will be eligible for weatherization pursuant to 10 CFR Part 440.22.

##### **Eligibility Procedures:**

The State of West Virginia Development Office (WVDO) has established an extensive intake/application process involving obtaining information from prospective program participants before a decision can be made on their eligibility for weatherization assistance. Each applicant must provide all the items outlined as “mandatory data fields” in the application

process/form. All prospective applicants will be required to identify and provide verification of the amount and source of the total income for their household in compliance with the U.S. Department of Health and Human Services 2018 poverty guidelines as identified in the Federal Register. WVDO will use the Definition of Income provided in DOE WPN 18-3 Poverty Income Guidelines and Definition of Income regarding cash receipts, exclusions, proving eligibility, and consideration of child support. Additional data fields included in the state data management system require the collection and reporting of household demographic and residence specific information including whether the applicant rents or owns his/her home, among other information. All applicants are required to sign their application and certify to the validity of the information provided. Falsification of an application is subject to ineligibility.

WVDO developed *WVWPN 13-9 - WAP Application and Review Queue Management Policy* which provides specific and detailed guidance on how the subrecipients are to utilize the various functions of the database management system. This ensures there is consistency among the WV WAP Network on how a client proceeds through the various stages of the weatherization process, including the intake process. This policy will remain in effect for PY 2018 – 2019.

#### **Income Verification Procedures:**

The eligibility documentation is maintained in the database management system and may be supplemented with a physical client file. All eligibility documentation is to be reviewed for compliance by the subrecipient prior to weatherization services being provided, and then entered into the database management system for eligibility calculation. If six (6) months or more has lapsed between the date of application and the date weatherization services is scheduled to begin on a particular job, the income of that client must be re-verified as per WV WAP requirements. WVDO provides a secondary review of eligibility documentation and process by selecting a sample of weatherization dwellings during the monitoring process. WVDO issued *WVWPN 13-5 - Income Eligibility Policy* on November 19, 2013, to provide updated uniform guidelines on the definition of income and determining income eligibility. WVDO also provides to the WV WAP Network the Poverty Income Guidelines and Definition of Income document as revised by DOE each program year to supplement the *Income Eligibility Policy*. For PY 2018 – 2019, WVDO released *WxBulletin 17-10 – DOE WPN 18-3 Poverty Income and Definition of Income* to the subgrantees on February 21, 2018, immediately after receipt of the WPN per guidelines stated in WPN 18-3.

All fifty-five (55) counties of West Virginia are eligible for weatherization services and are intended to be served by the WV WAP. Any West Virginia resident who meets client eligibility requirements and whose dwelling meets building eligibility requirements (also in compliance with 10 CFR 440.18(e)(2)(iii) regarding “Reweathering”) would be eligible to receive weatherization services. As per DOE requirements and 10 CFR 440.16(b), priorities are given to certain sectors of the eligible population. The WV WAP has also incorporated some priority features to enhance the DOE required priority eligible population categories and allow for

reasonable, efficient, and effective implementation of the WAP, including all funding sources. These priorities and the process followed are described in *Section V.3 Priorities*.

### **Qualified Aliens Eligibility for Benefits:**

The steps in the application/intake process detailed in the previous *Eligibility Procedures Section* ensure DOE weatherization services shall only be provided to eligible populations. These same procedures and parameters including income eligibility are utilized for West Virginia's Low-Income Home Energy Assistance Program (LIHEAP) Weatherization services.

### **V.1.2 Approach to Determining Building Eligibility**

#### **Reweatherization:**

The WV WAP has procedures in place to comply with DOE regulations and 10 CFR 440.18(f)(2)(iii) regarding "Reweatherization." Prior to any weatherization activity, a unit must be evaluated to determine whether previous weatherization services were provided after **September 30, 1994**. If services have been provided *after this date* with DOE funds, the unit is not eligible for additional weatherization services with DOE funds.

The following actions must be taken on each unit prior to weatherization services to ensure the homes that have received weatherization services after September 30, 1994, are not reweatherized:

1. Each client's address must be entered into the data management system to identify whether the client's home has been weatherized during or after 2007 (length of WV WAP historical records with searchable addresses);
2. Each client's name must be entered into the data management system's "Old Weatherization Data" module to check if the client has previously been reported as a completion during 1996 to 2007 (length of WV WAP historical records with client names only). If the client's name is found in the data management system as having had weatherization services, the subrecipient will verify with the client if they are living at the same address as when they received weatherization services in the past. If the client verifies that this is the same address, then the dwelling is ineligible for weatherization services.
3. A secondary verification occurs as each client must be asked whether their home has been weatherized after September 30, 1994.
4. If a dwelling passes the first two (2) verification steps, a third verification step is performed as a visual inspection of each home must be completed by an auditor to identify whether previous weatherization measures have been performed. If the home was completed after September 15, 2011, subrecipients are required to place



standardized tags on specified areas of dwellings after completing the weatherization process. This procedure is outlined in the *WAP Weatherized Unit Tagging Procedure as Amended February 9, 2012*.

5. If there is no documented, verbal, visual, or physical evidence of previous weatherization services, the subrecipient may proceed with weatherization services on the dwelling.
6. Subrecipients may provide services to a dwelling unit previously weatherized **prior to September 30, 1994**, as noted in the American Reinvestment and Recovery Act of 2009, and *DOE WPN 18-1, Application Instructions Section V.1.2*. A reweatherized unit falls into the category of time indicated above and described under 10 CFR 440.18(f)(2)(iii). DOE gives subrecipients the flexibility to revisit those homes weatherized prior to September 30, 1994, that may not have received the full complement of weatherization services, including the use of an advanced energy audit or addressing health and safety concerns.
7. The DOE-issued *Weatherization Program Notice 12-7 Disaster Planning and Relief* allows for additional work to be done on homes due to natural disasters. In the event of a declared Federal or State disaster, allowable expenditures under WAP include:
  - The cost of incidental repairs to an eligible dwelling unit if such repairs are necessary to make the installation of weatherization materials effective.
  - The cost of eliminating health and safety hazards, elimination of which is necessary before the installation of weatherization materials (10 CFR 440.18(d)(9); 10 CFR 440.18(d)(15).
  - To the extent that the services are in support of eligible weatherization (or permissible “Reweathering”) work, such expenditure would be allowable.

In the event of a declared Federal or State disaster, weatherization crews may return to a unit reported as a completion to DOE that has been “damaged by fire, or act of God to be reweatherized, without regard to date of weatherization” as per 10 CFR 440.18(f)(2)(ii). Local authorities must deem the dwelling unit(s) salvageable as well as habitable and if the damage to the materials is not covered by insurance or other form of compensation.

- Debris removal from a dwelling unit that is not to be weatherized would not be an allowable cost.
- Weatherization personnel can be paid from DOE funds to perform functions related to protecting the DOE investment. Such activities include: securing weatherization materials, tools, equipment, and weatherization vehicles, or protection of local subrecipient weatherization files, records and the like during the initial phase of the disaster response.

- Using DOE funds to pay for weatherization personnel to perform relief work in the community as a result of a disaster is not allowable.
- Local agencies may use weatherization vehicles and/or equipment to help assist in disaster relief provided the WAP is reimbursed according to the *DOE Financial Assistance Regulations*, 10 CFR Part 600 and 2 CFR 200.

WAP rules require that priority be given to identifying and providing weatherization assistance to elderly persons, persons with disabilities, families with children, high residential energy users, and households with high energy burdens as per 10 CFR 440.16(b). However, it would be permissible to consider households located in the disaster area as a priority as long as the households are eligible and meet one (1) of the priorities established in regulation, and are free and clear of any insurance claim or other form of compensation resulting from damage incurred from the disaster.

As referenced in #4 above, WVDO developed and implemented a *Weatherized Unit Tagging Procedure* policy on September 15, 2011, (amended on February 9, 2012) to identify dwellings as “Weatherization Completions” and maintain compliance with DOE’s *Reweathering Policy*. WV WAP’s *Weatherized Unit Tagging Procedure* requires the placement of a permanent and standardized tag on each completed dwelling unit including the following information:

- a. Subrecipient Name
- b. West Virginia Weatherization Assistance Program
- c. Sequential Number
- d. “DO NOT REMOVE” indication
- e. Initials of subrecipient Quality Control Inspector and date of Quality Control Inspection (indicated in permanent marker)

There are specific locations in the dwelling outlined in the policy where the subrecipients are to attach the tags in an effort to make as permanent as possible. The subrecipient is to attach two (2) tags in different locations in each dwelling in case one (1) would become detached. The subrecipient must also maintain a picture of the tag and its location in the dwelling unit as a Portable Document Format (PDF) in the data management system. Failure to adhere to the policy could result in the dwelling unit not being deemed as a “Completion” and in turn all associated costs could be disallowed. The procedure implemented also maintains sufficient accountability of the subrecipient (and specific Quality Control Inspector) providing the weatherization services on a particular dwelling.

## **Eligible Structures:**

Subrecipients shall ensure that weatherization services are being provided to low-income persons that live in standard types of housing, i.e., single-family, rentals, manufactured housing, and multifamily buildings. Subrecipients will exercise caution when approaching non-traditional type dwelling units including, but not limited to, shelters and apartments over businesses. WVDO will seek guidance from the WV DOE Project Officer as necessary if the WV WAP approaches a non-traditional dwelling. Weatherization of non-stationary campers and trailers that do not have a mailing address associated with the eligible applicant will not be allowed, even if utilizing a post office box. For procedures regarding structures that require deferral of services due to the structure being deemed at least temporarily ineligible, refer to the *Deferral Process* in a following segment of this section.

WVDO will disallow partial weatherization of a dwelling if turned in as a completion. A dwelling will only be deemed a completion if all measures called for from the audit have been completed, the unit has been reviewed and signed off on by a certified Quality Control Inspector, and all required documents are uploaded into the database management system. The Quality Control Inspector signature date will constitute the date of completion with no further work allowed on the dwelling. All required documents must be uploaded into the database management system on or prior to the Quality Control Inspection form date.

If in very rare and extreme circumstances, a client does not allow a subrecipient to complete the Quality Control Inspection in order to deem the dwelling as a completion, or the crew must halt weatherization for unforeseen circumstances with the client/dwelling (crew safety concern, death of a client, dwelling is vacated and/or sold, etc.), the subrecipient must notify WVDO. In cases where weatherization work was started but cannot be completed, signed and dated documentation must be entered into the client file as to why the weatherization work was stopped. Allowable expenses can be submitted, but the dwelling will not be counted as a completion. This option will be extremely rare in occurrence and only approved if all reasonable options to complete weatherization work including the final Quality Control Inspection have been attempted. WVDO will also pursue all other possible remedies including non-DOE funding sources for work performed, if allowable.

## **Historic Preservation**

As noted in DOE Weatherization Program Notice 10-12, DOE in coordination with the Advisory Council on Historic Preservation (ACHP) and the National Conference of State Historic Preservation Officers (NCSHPO), has developed a Prototype Programmatic Agreement (PA) to address historic preservation requirements for the WAP. The WV WAP is evaluating all National Historic Preservation Act (NHPA) Section 106 reviews utilizing guidelines set forth in a Letter of Understanding with the West Virginia Division of Culture and History State Historic Preservation Office (SHPO). All measures that fall outside the WAP, exempt from NHPA Section 106 review are being approved by West Virginia SHPO (WVSHPO). WVDO has two (2) staff members

trained to perform Historic Preservation reviews, approvals, and to provide guidance to WV WAP subrecipients.

WVDO will continue to work very closely with our WVSHPO and to utilize the Prototype PA to overcome the challenges before us while still meeting all guidelines of the NHPA. This relationship has built a strong partnership that proves advantageous to our respective organizations and also to the West Virginia families that we strive to serve.

West Virginia's State Energy Program (SEP) Office has not been able to negotiate a SHPO PA and consequently our state does not have an official DOE Historic Preservation PA. As a result, beginning in PY 2010, our state Weatherization Program Office worked with WVSHPO to negotiate, draft and agreed to a one (1) year Letter of Understanding for Historic Preservation Section 106 review compliance for weatherization activities. In subsequent years, renewed letters were executed. On December 1, 2014, WVDO began a new three (3) year Letter of Understanding with WVSHPO, through November 27, 2017. In March 2017, WVDO requested the Letter of Understanding start date begin April 1, 2017, and run through March 31, 2020. The WVSHPO approved this letter on April 25, 2017. This puts the renewal date just prior to the start of the DOE Program Year, which begins July 1.

#### **Rental Units:**

The WV WAP may provide weatherization to rental units, including multiple dwelling units (MDUs). The WV WAP has procedures that address the protection of renters' rights as per 10 CFR 440.22(b)(3) and 440.22(c)-(e). No rented dwelling unit can be weatherized without first obtaining the written permission of the owner (or his/her agent) of the dwelling unit. Completion of the "Weatherization Rental Release and Agreement" form is mandatory for multifamily rental units only.

The "Weatherization Rental Release and Agreement" form is designed to assure the following:

1. That the benefits of weatherization assistance shall reside primarily with the low-income tenants;
2. For a period of two (2) years from the date of signature on the "Weatherization Rental Release and Agreement" form, the rent shall not be raised because of the increased value of dwelling unit(s) due solely to weatherization assistance provided under this program;
  - Should a rental increase occur and the tenant perceive it to be due solely to the weatherization services provided, the tenant would notify the applicable subrecipient who would then contact WVDO, or the tenant may contact WVDO directly.
  - WVDO will instruct the tenant to file a written complaint with WVDO detailing the situation and the perceived reason for the rent increase.

- WVDO will work with the subrecipient and make contact with the landlord and notify that a complaint has been filed, and provide the landlord with a copy of the complaint. The landlord will have the opportunity then to appeal the complaint.
  - WVDO will obtain all pertinent information applicable to the dwelling and the weatherization services received and will review all of the information provided, seeking guidance from DOE and/or legal counsel as needed.
  - WVDO will work to resolve the situation in a way agreeable to all parties. WVDO encourages the use of alternative dispute resolution procedures including arbitration.
3. That no undue or excessive enhancement shall occur to the value of the dwelling unit;
  4. That no landlord contributions are allowed for single-family housing;
  5. That if an owner of the dwelling unit qualifies for WV WAP, no landlord contribution is expected; and
  6. For multifamily buildings, that a landlord outside the poverty guidelines of the WV WAP understands the requirements set forth by the “Weatherization Landlord Owner Investment” form which mandates a landlord contribution of twenty-five percent (25%) of the total cost of the various weatherization measures to the subrecipient performing the work.

In the event that all possible negotiations with the landlord have been attempted yet the landlord refuses contribution, the dwelling may still be weatherized with proper documentation and approval from WVDO.

All multifamily units will follow the established client prioritization protocols as established in single-family weatherization, unless otherwise determined by WVDO. Multiple dwelling units are defined as buildings containing five (5) units or more and can be weatherized if sixty-six percent (66%), (fifty percent (50%) for duplexes and quadraplexes) of the occupants qualify for weatherization assistance pursuant to Federal Regulation 10 CFR 440.22. Weatherization services provided to multifamily dwelling units will also be supported by WVDO’s *Multiple Dwelling Unit Policy and Guidance* implemented in February 25, 2011, which was updated to adhere to DOE WPN 16-5 Multifamily Weatherization and WPN 16-6 Weatherization of Rental Units. The “West Virginia Multifamily Owner Agreement” which is similar to the owner agreement described above, but is adapted for multifamily units, which adheres to DOE WPN 16-5.

**Deferral:**

The WV WAP developed and implemented a WV WAP *Deferral Policy* on August 21, 2012, to assist in the decision to defer weatherization assistance on an eligible dwelling in attempt to

standardize the procedure throughout West Virginia. As per the policy, a deferral does not mean that weatherization assistance will never be available, but that work must be postponed until the problems at the home can be resolved. Subrecipient crews and contractors are expected to pursue all reasonable options on behalf of the client, within program guidelines. After an on-site visit has been conducted, if conditions warrant and the subrecipient determines that the home meets one (1) or more of the following deferral conditions, a letter must be sent to the client outlining the conditions present at the dwelling and the justification for deferral. The reason for deferral must be selected and documented in the database management system and the database management system automatically generates the deferral letter with the proper justification to be submitted to the client.

Possible deferral conditions include but may not be limited to the following:

- a. Structurally unsound dwelling that is not suitable and adaptable to weatherization services, and the WAP does not have the resources to do necessary repairs;
- b. Electrical or plumbing hazards that cannot be resolved prior to or as part of weatherization services;
- c. The presence of raw sewage around or in any part of the dwelling;
- d. The presence of a dead animal, or animal feces, in an area where program staff must install weatherization measures;
- e. Excessive debris and clutter around the dwelling that limits access to the dwelling;
- f. Pets unchained or running loose that would be distracting or unsafe to program staff;
- g. The client is uncooperative, abusive, or threatening to the crew, or there is an apparent threat of violence or abuse to any program worker, or any household member, during the weatherization process;
- h. The presence or use of any controlled substance in the dwelling during the weatherization process;
- i. Environmental hazards, such as serious moisture problem, known excessive radon, friable asbestos, excessive lead paint, or other environmental hazards that cannot be resolved prior to or as part of the weatherization services;
- j. Evidence of substantial infestation of rodents, insects, bats, or other harmful/objectionable animals that are difficult to control;
- k. Major remodeling is in progress, limiting the proper installation of weatherization measures;

- l. Substantial standing water in or around the crawl space or basement area limiting the proper completion of weatherization measures;
- m. Dwelling resident has a medical condition that prohibits the installation of insulation and/or other weatherization measures;
- n. No cost-effective or appropriate health and safety measures can be done to the house resulting in minimal energy savings;
- o. Customer in arrears with utility vendor, gas service has been shut off, or electric service has been shut off;
- p. Client refusal of primary energy conservation measure ( $SIR \geq 2$ );
- q. Client refusal of health and safety measure(s) necessary for client safety;
- r. Income verification needed;
- s. Updated utility information needed; and
- t. Other conditions not listed above that prohibit complete weatherization.

There are several steps detailed in the WV WAP *Deferral Policy* outlining the subrecipient and/or client's responsibilities after the aforementioned deferral letter is generated in order to possibly complete weatherization for a client that was originally deferred. These steps involve allowing the client to correct the identified issues or barriers to weatherization and providing the subrecipient with documentation that issues have been addressed. There is also a procedure in place in the event that issues are not addressed or no response is received from the client. Once reasons for deferral are resolved, the application is re-activated within the data management system. Depending on the timing of the correction of deferral issues, eligibility criteria including income verification and prioritization status may need refreshed. The WV WAP Deferral Policy outlines the timing parameters in more detail. All applicable steps must be followed and all required documentation retained.

### **V.1.3 Definition of Children**

In terms of prioritizing households including children, the State of West Virginia has defined "children" as those eighteen (18) years old and under in compliance with 10 CFR 440.3.

### **1.4 Approach to Tribal Organizations**

In accordance with Federal rule, the State of West Virginia recommends that tribal organizations not be treated as local applicants eligible to submit an application to operate a

Weatherization Assistance Program. In accordance with 10 CFR 440.16(f), low-income Native Americans will receive benefits equivalent to assistance provided to other low-income persons within the State as eligible individual applicants under program guidelines.

## **V.2 Selection of Areas to be Served**

The method used to select each area to be served by a weatherization project will be as follows:

1. All fifty-five (55) counties in West Virginia will be served by the WV WAP.
2. Selection of weatherization subrecipients or qualified entities is made pursuant to 10 CFR 440.15.
3. Subrecipients in the State operate the WAP in service areas designated by specific counties, barring any unforeseen circumstances necessitating service area alteration. Subrecipients may contract with one another in efforts to more efficiently and effectively provide weatherization services to all counties within a subrecipient's service area.
4. In the event that WVDO determines that a subrecipient fails to meet WV WAP Grant Agreement requirements, options include (but are not limited to) allocating the funds to other eligible subrecipients or qualified entities in the State.

**Redistribution Provision:** As necessary through the administration and management of this award, WVDO may move funds between cost categories, functions, and activities to fully expend the monies during the budget period, which could include moving funds between subrecipients. All budget alterations or revisions will be in accordance with 2 CFR 200.308(e) and all other applicable Federal rules and regulations. Parameters and criteria outlining situations in which a subrecipient would have an allocation reduced, receive an additional allocation, or need to move funds within their own budget are laid out in the subrecipient WV WAP Grant Agreements, following all applicable Federal rules and regulations.

## **V.3 Priorities**

The WV WAP will give priority to identifying and providing weatherization assistance to elderly persons (60 years of age or older), persons with disabilities, and households with children (18 years of age or younger). Priority can also be given to households with a high-energy burden which has two (2) components to its definition. Clients can be considered high energy burden if:



- a. Fifteen percent (15%) or more of the household income is utilized to pay for energy usage; and/or
- b. Clients are eligible for the Energy Crisis Intervention Program (ECIP), an emergency heat services component of the LIHEAP funding the WV WAP receives from the West Virginia Department of Health and Human Resources (DHHR).

Priority can also be given to clients considered high energy users. Clients will be considered high energy users if \$2,100 or more is expended by the client on residential energy annually, which will be calculated within the database management system utilizing utility bill information.

These priorities are weighted the same with regards to the points they receive except for ECIP eligibility allowing for comprehensive weatherization services to be provided within a reasonable amount of time from when the client received emergency heat services, increasing the efficiency and cohesiveness between the programs.

Another factor considered when prioritizing clients in order to have a reasonable and equitable system is the time spent on the Waitlist; however, clients only receive one (1) point per year and therefore it will be ensured that time on the Waitlist does not outweigh other factors within the prioritization system.

The WV WAP has also incorporated priority features to enhance the DOE required priority eligible population categories and allow for reasonable, efficient, and effective implementation of the WAP. Such prioritization features allow for consideration of timing of services provided by other funding sources.

There are utility funds that supplement the WV WAP, and Federal and non-Federal resources are blended in order to serve more low-income clients as well as in some cases provide services in addition to those the traditional WAP is able to provide. There are situations in which clients eligible for certain utility program funding may receive additional priority in order for the utility funds to be expended effectively and within the proper time periods. This allows the WV WAP to continue to obtain these funds for future program years.

Finally, there could be instances in which clients are given priority as part of a multifamily project completion. Clients in an identified eligible multifamily dwelling may not all be at the top of the prioritization list, and therefore additional priority could be given to the clients in order for the project to be completed. However, WVDO requires advance planning from subrecipients for the completion of multifamily dwellings and ensures that multifamily projects do not supplant services provided to single-family dwellings, which are the large majority of completions for the WV WAP.

WVDO has developed a point system to rank clients using the aforementioned prioritization criteria in the data management system that tracks all clients, dwellings, and weatherization

work. The WV WAP subrecipients must adhere to this prioritization list and point system within the data management system unless otherwise directed or approved by WVDO.

WVDO may modify the prioritization system throughout the Program Year within the parameters of the program in instances including, but not limited to, adjusted rules and regulations or additional funding sources identified. The intent of the prioritization system will always remain consistent on serving low-income clients as efficiently and effectively as possible, working to reduce energy costs, as well as to expending all funding sources within the proper timeframes and in compliance to all applicable rules and regulations. Subrecipients do not have the ability to manipulate or alter the prioritization system or criteria without written approval from WVDO.

WVDO implemented *WAP Priorities for Service Delivery* on July 1, 2014, which will remain in place for PY 2018 – 2019. WVDO modified the database management system to ensure clients are being prioritized properly and effectively. The database management system only allows those clients highest on the priority list (based on the previously described point system) to be selected for service by a particular subrecipient, unless otherwise approved by WVDO. The system allows for a reasonable “pool” of high priority clients a subrecipient must select from so that there is flexibility built into the system, while also ensuring all clients served are high priority clients. Due to the number of high priority clients that will be available for a subrecipient to select from, WVDO does not anticipate any issue with all counties in West Virginia being provided weatherization services in an efficient and effective manner throughout the year. However, this process will be monitored throughout the year by WVDO and adjusted if necessary.

Subrecipients shall ensure that weatherization services are being provided to low-income persons that live in standard types of housing, i.e., single-family, rentals, manufactured housing, and multifamily buildings. Housing type is not a recognized priority and is not factored into the WV WAP prioritization process. WVDO will monitor the system through completion and deferral review to ensure eligible clients are not discriminated against due to housing type.

#### **V.4 Climatic Conditions**

West Virginia is the 41st largest of the 50 United States with a total area of 24,230 square miles. Within its boundaries, elevations reach as high as 4,863 feet above sea level (Spruce Knob in Pendleton County) and as low as 240 feet above sea level (Potomac River on the Virginia border).

The International Energy Conservation Code (IECC) has defined two (2) distinct climate zones that cover West Virginia. These climate zones help approximate the performance of a building within each zone due to the effects of heating- cooling demand, precipitation, and relative humidity.

Due to the variations in climate throughout the state, each energy audit shall be adjusted to most accurately model the climactic conditions of the individual location. Likewise, each energy audit shall indicate the model climate used represented as locations included in the DOE approved auditing software (the Weatherization Assistant software as described in *V.5.2 Auditing Procedures*). At the present time, Zone 1 is identified as Charleston, WV, and Zone 2 is identified as Elkins, WV, in the DOE approved auditing software. These two (2) zones are utilized by all WV WAP subrecipients, with one (1) exception; the subrecipient that covers the four (4) counties in the northern panhandle of West Virginia (Brooke, Hancock, Ohio, Marshall) uses Zone 3 identified as Pittsburgh, PA, as that location more closely fits the subrecipient's local climate profile.

A rough map of the IECC climate zones and the additional zone is included as an attachment with this application.

Cooling Degree Days (CDD) and Heating Degree Days (HDD) data is submitted as an attachment to the application. A summary of the data for all three (3) zones is as follows:

Zone 1 – Charleston, WV:

CDD – 1011

HDD - 4718

Zone 2 – Elkins, WV:

CDD – 307

HDD – 6438

Zone 3 – Pittsburgh, PA:

CDD – 740

HDD – 5637

Based on the cooling degree days and dual climate zones, the WV WAP has included specific cooling measures under certain circumstances as detailed under *Section V.7 Health and Safety*.

The HDD and CDD data used for analysis was obtained from the link below.

- National Climatic Data Center (using information from the NOAA)  
<http://ggweather.com/normals/>

## **V.5 Type of Weatherization Work to Be Done**

### **V.5.1 Technical Guides and Materials**

All measures and incidental repairs performed on client homes will meet the specifications, objectives and desired outcomes outlined in the Standard Work Specifications (SWS) for Home Energy Upgrades. WVDO partnered with Community Housing Partners Energy Solutions

Training Center (CHP) to develop the WV WAP Standard Work Specifications (WV WAP SWS) utilizing the “Deck of Cards” model. This document functions as a combination standards and field guide. These field standards meet or exceed the minimum standards outlined in the national SWS. The document references the appropriate SWS for the procedure being described and clearly states with narrative and photographs the required specifications for that procedure. It functions as in-field instructional reference guide for program supervisors and technicians and has replaced all previous field guides or standards.

WVDO submitted the WV WAP SWS for Single Family Homes and WV WAP SWS for Manufactured Housing on December 23, 2015. WVDO received DOE approval on January 7, 2016. WVDO is currently updating the WV WAP SWSs in preparation to submit for DOE review and approval prior to the three-year time limit, which is January 7, 2019. A link to both documents is provided:

[https://www.dropbox.com/sh/edmdfrf6ocsih6t/AADH01\\_uD5MxC1m9PXnoGWExa?dl=0](https://www.dropbox.com/sh/edmdfrf6ocsih6t/AADH01_uD5MxC1m9PXnoGWExa?dl=0)

WVDO develops and distributes West Virginia Weatherization Program Notices (WV WPN) and West Virginia Weatherization Bulletins (WV WxBulletin) to provide additional guidance on specific requirements and major program updates and/or changes. These notices are in supplement to DOE Weatherization Program Notices and are the basis of the WVDO Field and Administration Guide (F&A Guide) which was revised and made available to all subrecipients in February 2017. The F&A Guide is updated when new WV WAP Policies are distributed and/or new DOE guidelines mandate programmatic or field/technical changes. WVDO developed West Virginia WxNOW in the 3<sup>rd</sup> Quarter of PY 2016 – 2017, and sends the informative newsletter to subrecipient staff each quarter. WxNOW provides information pertaining to various weatherization policy, field/technical, monitoring, and training topics that are relevant and important to the day-to-day operations at the subrecipient level. Topics are determined from monitoring findings, DOE policy or news releases, training/conference notifications, etc.

Prior to the start of PY 2016 – 2017, WVDO provided all subrecipients with the WV WAP SWS Single Family and Manufactured Housing manuals which include technical requirements and expectations of work quality for field work including: diagnostic testing; installation of energy conservation, health and safety and incidental repair measures; and final Quality Control Inspections. WVDO provided both electronic and physical guides based on preference of each subrecipient. WVDO confirms receipt and acknowledgment of those requirements through execution of DOE WAP Grant Agreements with subrecipients, with a signature on behalf of the subrecipient serving as proof of receipt.

The specifications for work to be inspected are referenced in the subrecipient DOE WAP Grant Agreement. Contractors hired by the subrecipient must have agreements that include the same technical requirements referenced above. The work of the contractor must be consistent with all WV WAP standards and requirements.

Additional training as necessary on WV WAP SWS is provided to subrecipients as detailed in *Section V.8.4 Training and Technical Assistance* to ensure consistent compliance throughout the network.

All weatherization work is being performed in accordance to the DOE-approved energy audit procedures and 10 CFR 440 Appendix A.

### **Other Renewable Energy Systems:**

Assistance under the WAP may be provided for renewable energy systems. Any renewable energy system measures implemented by a subrecipient must have WVDO written approval prior to work being performed. A site-specific Weatherization Assistant energy audit must be included as part of the client file which will be reviewed by WVDO as part of the approval process.

10 CFR §440.18 (Allowable Expenditures) incorporates the renewable energy system provisions and specifies a ceiling of \$3,000 per dwelling for labor, weatherization materials, and related matters, subject to annual adjustments. As per DOE WPN 18-1 Section 3.1.1, the percentage increase in the Consumer Price Index (CPI) for the previous 12-month period (October 2016 – September 2017) was 2.2 percent (2.2%); therefore, the PY 2018 adjusted average for renewable energy measures is **\$3,623 with a SIR greater than one (>1). (last year \$3,598)**

*The adjusted average for renewable energy measures is not a separate average, but part of the overall adjusted average expenditure limit of \$7,261. (last year - \$7,212)*

Because the total average cost per unit exceeds the renewable measures allowance, the major effects of the regulation are to provide criteria and a procedure for integrating renewables into the WAP, and to establish a process for evaluating petitions to use new or innovative renewable energy systems in the WAP.

10 CFR 440.21(c)(1)(i-iv) specifies performance and quality standards criteria for renewable energy systems. Paragraph (c)(2) establishes a procedure for submission and action on petitions by manufacturers requesting the Secretary of Energy to certify a new technology or system as an eligible renewable energy system.

Approved renewable energy systems will be listed in Appendix A of Part 440, Standards for Weatherization Materials.

### **V.5.2 Energy Audit Procedures**

<u>Unit Types</u>	<u>Audit Procedures and Dates Most Recently Approved by DOE</u>
Single-Family	National Energy Audit Tool (NEAT) approved by DOE November 15, 2016.

Multifamily	<ul style="list-style-type: none"> <li>- 1-5 Units, individually heated/cooled, garden style apartments - NEAT audit with 3 or less stories</li> <li>- Small MDU less than 25 units, individually heated/cooled - NEAT audit Sampling*</li> <li>- MDU greater than 25 units – DOE Project Officer Approval</li> </ul>
Mobile Home	Manufactured Home Energy Audit Tool (MHEA) approved by DOE November 15, 2016

\**Audit Sampling:* To ensure a true representation of the building, an audit(s) must be completed on apartments with different configurations and heat loss characteristics (ex: 1 bed. bottom floor, 1 bed. middle floor, 1 bed. top floor, 2 bed. bottom floor). An audit of at least twenty-five percent (25%) of the total number of units in each building must be conducted. Each audit must include photo documentation of existing conditions (ex: insulation levels, venting, etc.).

WV WAP uses the Weatherization Assistant software as its energy audit tool. The Weatherization Assistant energy audit software was developed by Oak Ridge National Laboratory specifically for the use for the Weatherization Assistance Program. There are two (2) components to the Weatherization Assistant software: The National Energy Audit Tool (NEAT) for single family houses and the Manufactured Home Energy Audit (MHEA) for mobile homes.

As per 10 CFR 440.21(i), WVDO submitted the Weatherization Assistant audit procedures to DOE for approval for use in the WV WAP for another five (5) years on February 17, 2016. WV WAP received approval from DOE on November 15, 2016, for the Weatherization Assistant audit.

As per 10 CFR 440.21(h), WVDO included within the submittal of audit procedures the DOE determined list of general heat waste (GHW) reduction weatherization materials from DOE WPN 13-5 and plan to incorporate the usage of the identified GHW materials as guided by DOE WPN 13-5 and any other applicable DOE guidance. Based on GHW costs and effects on individual and cumulative SIRs, WVDO is evaluating not to include the GHW in the audit.

Each subrecipient must have at a minimum one (1) energy auditor with a good working knowledge of NEAT and MHEA or an approved contract in effect with another subrecipient to perform energy audits. Some subrecipients have obtained the Home Energy Professional Energy Auditor certification, and WVDO will continue offer the training and certification to subrecipients during PY 2018 – 2019 to improve and enhance the audit process. For multifamily units, until MulTEA is implemented and subrecipient auditors can acquire accredited training, WVDO has a procedure in place, *Multiple Dwelling Unit Policy and Guidance*. As mentioned in *Section V1.2.*, WVDO’s *Multiple Dwelling Unit Policy and Guidance* has been revised as guided by DOE WPN 16-5 Multifamily Weatherization and WPN 16-6 Weatherization of Rental Units. WVDO will continue to seek input and guidance from the DOE Project Officer on the *Multiple Dwelling Unit Policy and Guidance* on an “as need” basis.

Multifamily units are defined as buildings containing five (5) units or more and can be weatherized if sixty-six percent (66%), (fifty percent (50%) for duplexes and quadraplexes) of the occupants qualify for weatherization assistance pursuant to Federal Regulation 10 CFR 440.22. The majority of eligible units in West Virginia are considered to be primarily garden style apartments, with less than twenty-five (25) units per structure, three (3) stories or less where the units are individually heated and/or cooled and have exterior access. Hence, these dwellings will be the focus of the WV WAP's multifamily weatherization efforts. Each multifamily unit (including those that have less than five (5) units) must meet the previously mentioned audit procedures and all other procedure and documentation requirements set forth in the WV WAP *Multiple Dwelling Unit Policy and Guidance*. Prior to commencing weatherization of the building, WVDO must review and approve of the project. A minimum twenty-five percent (25%) audit sampling must be completed on apartments with different configurations and heat loss characteristics for each building to be weatherized.

Due to increased and more complicated requirements and procedures, any multifamily project *greater* than twenty-five (25) units would have to be submitted for review and approval to the DOE Project Officer prior to commencing weatherization.

### **V.5.3 Final Inspection**

Quality Control Inspectors (QCIs) working for, or contracted by the WV 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 subrecipient final inspectors and WVDO monitoring staff.

Certified subrecipient QCI's are required to perform a final inspection of each dwelling unit before it can be reported as a completion. The final inspection must be performed by the certified QCI using the WV WAP mandated "QCI form" (attachment to application) and certify that the work has been completed in a professional manner and is in accordance with the priority determined by the audit procedures required by 10 CFR 440.21. To be in compliance with DOE WPN 15-4, during PY 2018 – 2019, only those who possess the Home Energy Professional (HEP) QCI certification may perform inspections and sign off on work performed in homes. All subrecipients except for one (1) have demonstrated QCI competency by receiving certification as an HEP QCI. One (1) subrecipient currently has contracted with an out of state vender to perform Quality Control Inspections. This subrecipient does have a staff member currently in QCI training. Any subrecipient without a QCI on staff will ensure a certified QCI outside the agency performs all inspections until the certification is achieved.

The credentials of each subrecipient QCI are maintained in the database management system. WVDO will review the system periodically to ensure QCI credentials remain up-to-date as well as during the annual monitoring process. WVDO has set up or reviewed/approved all training and certifications of QCI staff (as described in *Section V.8.4 Training and Technical Assistance Activities*) thereby ensuring the validity of all credentials. WVDO will continue to either set up

any additional certifications for the Weatherization Network, or review and approve that the proper certification is sought and obtained and all procedures followed prior to reimbursement for any training/certification expenses.

WVDO revised the standardized QCI form in 2016, which was based on DOE's example of a quality assurance document, modified to meet the needs of the WV WAP. The revised form was submitted to the subrecipients for use in PY 2016-2017.

The form and the associated policy provide uniform guidelines and practices for final inspections of units at the subrecipient level to ensure such are performed correctly and thoroughly prior to being submitted as a completed unit. Signatures are required on the form certifying the unit had a final inspection and met all required standards. The inspection includes an assessment of the Weatherization Assistant audit performed and confirms that measures called for on the Work Order were appropriate signifying the proper SIR.

In regards to DOE WPN 15-4 compliance, WVDO ensures through the monitoring process described in *Section V.8.3 Monitoring Activities* that work performed by the subrecipient meets the criteria outlined in the WV WAP SWS.

If during the monitoring process it is discovered a subrecipient QCI is not inspecting units using the standards adopted by the State and consistent with the WV WAP SWS, WVDO will initiate a Quality Improvement Plan (QIP) process with the subrecipient, also described in *Section V.8.3 Monitoring Activities*. WVDO will work with the subrecipient to identify the best course of action to address whatever deficiencies may exist in the Quality Control Inspection process including both internal steps a subrecipient can take, as well as external training and technical assistance WVDO can provide or obtain. Depending on the nature and severity of the issues found, WVDO may take disciplinary or punitive actions including but not limited to the monitoring of any job a subrecipient is attempting to turn in as a completion, disallowing of costs/completions, and repayment of funds.

Due to staffing limitations of certain subrecipients, the WV WAP instituted a combination of the two (2) DOE Prescribed QCI Policies of Independent QCI and Independent Auditor/QCI. At this time, not all subrecipients have the staff to have a separate Auditor and QCI. For such subrecipients, WVDO will increase the monitoring efforts of completed dwelling units as per DOE WPN 15-4. For subrecipients that have an independent QCI, WVDO will monitor at least five percent (5%) of completed dwelling units. For subrecipients that have an Auditor that also performs the functions of QCI, WVDO will monitor at least ten percent (10%) of completed dwelling units. This percentage will increase based on issues identified and/or capacity of WVDO staff. WVDO will work with the subrecipients and make all reasonable efforts with the funding available to train and certify enough staff to separate the Auditor and QCI duties at the subrecipient level where it is possible to do so. As stated in *Section V.8.4 Training and Technical Assistance Activities*, WVDO will continue to offer additional QCI training and certifications as funding allows throughout the PY. Except for extremely extenuating circumstances, the QCI will not have performed any other work on the completed dwelling unit. WVDO will utilize the monitoring process to ensure the integrity, impartiality, and quality of the inspection process.



## **V.6 Weatherization Analysis of Effectiveness**

WVDO performs a variety of analysis of the WV WAP (statewide, subrecipient specific, objective/measure/process specific, etc.) at different times throughout a program year. Some data collection and analysis is performed on a routine basis for general oversight purposes; however, WVDO also investigates specific issues as they arise using different tools and database reports. Program production, goal attainment, and expenditure rates are tracked on a monthly basis for each subrecipient at the State level on a statistical analysis tool. These statistics are analyzed periodically, and the appropriate feedback and technical assistance is provided to those subrecipients not meeting goals, benchmarks, or compliance expectations. The subrecipients use the same statistical analysis tool for tracking their own production and expenditures to further ensure routine evaluation of local programs and reevaluation of goals when necessary.

A monthly “Dashboard” outlining the status of the weatherization program statewide was developed by WVDO and is submitted to the Weatherization Network after all reports have been submitted, data reviewed, and funding requests approved. This spreadsheet displays a wide range of summary information including expenditure numbers, health and safety percentages, completion data, and average job cost. WVDO developed supplemental spreadsheets to the “dashboard” which breaks down information in a more detailed manner. It provides a detailed line item breakdown of expenditures per funding source and average job cost. It also displays dwelling type served and fuel type served.

WVDO works to establish production and expenditure benchmarks and includes as necessary and feasible in the subrecipient WAP Grant Agreements to increase accountability and ensure proper program management.

The WV WAP utilizes the database management system to track all weatherization work performed on any dwelling. The database management system coupled with the aforementioned statistical analysis tool and other statistical spreadsheets facilitate a review/analysis process essential for program management and oversight. The review process in various forms including desk-top review, serve as routine procedures to ensure compliance, as well as an initial monitoring process to confirm that measures are performed and tracked according to program standards, and that diagnostic and health and safety tests are performed and documented correctly. This process allows for the identification of trends that may convey a training or technical assistance need, or specific jobs that may need to be monitored due to documentation of measures.

As mentioned in the *State Plan Annual File*, during PY 2015 – 2016, WVDO developed and implemented a system to estimate annual energy savings for all funding sources as per 440.14(c)(4). The process entails utilizing data from the “Weatherization Assistant Recommended Measures Output Report.” The WV WAP has the capability to compare productivity and associated energy savings data from the individual subrecipients and has the capability to analyze by measure. In PY 2018 – 2019, the WV WAP will continue to collect

program year data and WVDO will pursue any additional development needed of the database management tool reporting capabilities to be able to utilize the data effectively in the future. WVDO performs a review of the Weatherization Audit Tool usage by each subrecipient during monitoring visits to ensure material and fuel costs are up to date in the “Setup Libraries” ensuring the system is performing accurate cost effectiveness evaluation.

As stated in section *V.8.3 Monitoring Activities*, WVDO also tracks the most significant deficiencies of subrecipients in a “Root Cause Analysis” spreadsheet that displays trends of the subrecipients’ performance over a period of several years. This analysis is another contributing factor to the identification of training and technical assistance activities and priorities. For PY 2018 – 2019, WVDO will continue to track Strengths, Weaknesses, Best Practices, and Other Needs for more efficient analysis from more information readily available and organized. The collection and analysis of the data, and the improvement of tools and processes each year keeps WVDO on a path of continuous improvement with regards to support, guidance, and oversight which in turn will keep the subrecipients on the same path regarding the weatherization services provided and management of the program.

During the monitoring process, WVDO confirms the subrecipient has internal evaluative processes in place to facilitate improvement as needed (ex: Quality Control Inspector) to identify issues internally at the subrecipient level. This subrecipient process can assist WVDO in identification of training and technical assistance needs. Also, as discussed in *V.8.3 Monitoring Activities*, WVDO also ensures through the monitoring process that identified deficiencies are corrected through a Quality Improvement Plan (QIP) and WVDO follows up and verifies the correction through desk-top monitoring or on-site follow-up visits as necessary.

A final piece of analysis of a segment of the WV WAP is performed by a third party as part of evaluation of one (1) of the utility/leveraged programs that supports the WV WAP. As discussed in the *State Plan Annual File*, one (1) of the programs that has supplemented the WV WAP since 2012 is funding received from American Electric Power (AEP) for comprehensive weatherization services for customers within AEP’s service territory. A third-party company is brought in to evaluate the program each year by analysis of data, surveys of participants and program managers, and site visits of a sample of dwellings served by the program.

## **V.7 Health and Safety**

The *WV WAP Health and Safety Plan* is included as an attachment. A “Material Identification Chart” is also included as an attachment as part of the *WV WAP Health and Safety Plan* which assists in identification of health and safety, incidental repair, and ancillary materials/measures.

## **V.8 Program Management**

### **V.8.1 Overview and Organization**

Midway through PY2016 – 2017, the former administering agency of the WV WAP, the West Virginia Office of Economic Opportunity (WVOEO), and all its functions were merged into the West Virginia Development Office (WVDO). Therefore, the WV WAP is now administered by WVDO. As the former WVOEO had been, WVDO is an agency under the West Virginia Department of Commerce.

WVDO also administers the Community Services Block Grant (CSBG); Emergency Solutions Grant (ESG); Housing Opportunities for Persons with AIDS (HOPWA); Low-Income Home Energy Assistance Program (LIHEAP); LIHEAP Application Intake; West Virginia's Appalachian Regional Commission (ARC) program; the Community Development Block Grant (CDBG); Disaster Recovery (DR) funds; West Virginia's Land and Water Conservation Fund (LWCF); Neighborhood Stabilization Project (NSP); the Flex-E Grant; Main Street; ON TRAC; Neighborhood Investment Program (NIP); Community Participation Program; Waste Coal funds; Local Economic Development/ Certified Development Communities (LED/CDC) grants; and Intergovernmental Review, as well as participates in Broadband development initiatives.

The division of WVDO in which the WV WAP – in addition to the other programs listed in the preceding paragraph – operates is West Virginia Community Advancement and Development (WVCAD). The WV WAP and these other programs are overseen by the WVCAD Director. The WVCAD division's programs and functions are subdivided among four (4) units/groups – *Sustainability, Infrastructure, Compliance, and Resiliency*. The *Compliance Unit* subsumes the monitoring functions of several programs contained in the other three (3) units, including the monitoring functions of the WV WAP. An organizational chart of WVCAD is provided as an attachment.

With this arrangement, WV WAP staff straddle two (2) of the three (3) units/groups of WVCAD – *Sustainability* and *Compliance*. In the *Sustainability Unit*, WV WAP staff include a Program Manager supervised by a non-WAP Sustainability Manager, and an assistant whose primary duties include Historic Preservation reviews and Training and Technical Assistance (T&TA) approvals and records upkeep. In the *Compliance Unit*, WV WAP staff include an Assistant Manager/Monitor (1) and three (3) additional monitoring staff supervised by a non-WAP Compliance Manager. The guidance previously provided by a Program Development Manager is still provided by the same individual in his new position of Deputy Director, but with less time spent. The Database Systems Specialist position is vacant; those duties related to the WV WAP. Administrative staff assist with filing and forwarding subrecipients' training requests.

The WV WAP is not responsible for the State Energy Program, which is administered by the West Virginia Division of Energy (WVDOE). WVDOE is also a division under the West Virginia Department of Commerce. The WVDOE merged with WVDO in PY 2017 -2018.

The WV WAP is administered utilizing all applicable Federal rules and regulations including 10 CFR Part 440 as well as any additional rules and regulations that come into effect due to the Federal implementation of the OMB Circular 2 CFR 200 - Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR 200.); DOE specific regulations codified in Part 910 of 2 CFR and Department of Health and Human Services (HHS) specific regulations codified in 45 CFR Part 75; all applicable provisions of Treasury Circular Number 1075, and State of West Virginia Executive Order 12372 (Intergovernmental Review Procedure); and all other state rules and regulations that apply including West Virginia Purchasing Procedures. The WV WAP also follows all DOE specific guidance as provided through DOE WPNs and WAP Memorandums. The WV WAP incorporates these requirements as applicable into subrecipient WAP Grant Agreements and Memorandums of Understanding, as well as into any operations manuals or guidance created.

### **V.8.2 Administration Expenditure Limits**

For PY 2018 – 2019, the statutory ten percent (10%) of administrative funds will be divided evenly between the subrecipients and WVDO. As per DOE guidance, the State Plan includes a redistribution provision to enable the Grantee to actively manage the grant and move funds as necessary to fully expend the monies during the budget period which could include moving funds between subrecipients. All budget alterations or revisions will be in accordance with all other applicable Federal rules and regulations.

A separate budget category is permitted by DOE for financial audits. The cost of these audits was previously charged to the already over-burdened administrative cost category and sometimes resulted in financial audits of less than adequate quality. WVDO is providing relief to the subrecipients by allowing these charges to be covered by a separate category, if the subrecipients meet the threshold contained in 2 CFR 200. These costs will be actual costs of the weatherization portion of the audit.

### **V.8.3 Monitoring Activities**

#### **Introduction**

Monitoring is one of the most significant and intricate procedures undertaken by WVDO. WVDO must adhere to multiple funding bodies' guidelines as well as construct and adhere to state-specific guidelines and protocols structured in a way to facilitate successful and functional program management throughout the State of West Virginia. Monitoring is one of the many tools utilized by WVDO in an effort to continually improve the capabilities and effectiveness of the various subrecipients. Monitoring is a systematic process of gathering and evaluating information, as well the physical visitation of sites, in order to support and assess the subrecipients and their programs in terms of performance, capacity, and compliance. As a Pass-through entity of Federal dollars, WVDO ensures that grant funds are expended in

accordance with applicable law, including regulations contained in 10 CFR part 440 specifically 10 CFR 440.23(a); 2 CFR 200 specifically 2 CFR 200.331, 2 CFR 910 and 45 CFR Part 75; DOE WPNs including DOE WPN 15-4, and WPN 16-4, and other policies and procedures that DOE may issue. The WV WAP Monitoring Plan will include the following areas:

### **Approach**

WVDO will conduct a monitoring of each subrecipient at least once a year, provide a written report to the subrecipient, and maintain both electronic and physical files related to monitoring which are accessible to DOE during its monitoring visits. The monitoring tools utilized by WVDO are based off tools and templates provided by DOE through *WPN 16-4 Updated Weatherization Assistance Program Monitoring Guidance* and *WAP Memorandum 015 - Weatherization Financial Toolkit – 2 CFR 200 Regulations and Procurement Procedures*. WVDO has revised monitoring tools and forms to reflect the updated guidance as well as WV WAP SWS references. WVDO has also developed a monitoring module of the database management system to be used for formation of monitoring reports, QIPs, and other monitoring process aspects.

WVDO will also conduct periodic off-site, desk-top monitoring utilizing the database management system used to track all weatherization work, at times coupled with the statistical management tool and related analytical spreadsheets used to track production, expenditures, and other performance indicators. This process will serve as a pre-monitoring activity as well as routine review and oversight as needed. The desk-top monitoring activity is utilized to confirm that measures are performed and tracked according to program standards, and that diagnostic and health and safety tests are performed and documented correctly. It is also used to ensure all documentation for a client and dwelling are maintained and completed properly and accurately. This process allows for the identification of trends that may convey a training need, or specific jobs that may need to be monitored due to documentation of measures. The development of the database management system over the last several programs years greatly increased WVDO desk-top monitoring capabilities to increase efficiency and effectiveness of monitoring, as well as to reduce expenses. WVDO will continue to use these enhanced capabilities for the current Program Year.

The monitoring performed by WVDO will be broken down into three (3) components which may be performed at different times if necessary and may have differing frequency depending on quality of subrecipient performance in each focus area. The monitoring will include the following focus areas and details:

### **Programmatic and Management Monitoring**

- Subrecipient Production Analysis and Review (ensuring benchmark and yearly goal completion)
- Financial/Administrative Components

- Inventory (Equipment and Materials)
- Warehouse
- Rolling Stock
- Eligibility processes and compliance
- “Reweathering” compliance
- Compliance with all WVDO mandated forms, processes, and policies
- Database management system usage and reporting
- Reporting and funding requests
- Client Files and related documentation
- Health & Safety Components (Safety meetings/Lead Safe Work [LSW] Practices, documentation/Warehouse & Vehicle Safety/Health and Safety percentage)
- Energy Education
- Training & Technical Assistance
- Procurement Practices
- Client Prioritization methods
- Utility (leveraged) fund usage, documentation, and reporting
- Insurance coverage
- Subrecipient personnel qualifications/certifications and associated work performed
- Subrecipient internal corrective action procedures (for reduction of deficiencies)

### **Field/Technical Monitoring**

- Program Overview (Client File Review, Work Orders, Documentation of measures, etc.)
- Compliance with all WVDO mandated field/technical forms, processes, and policies (ex: Quality Control Inspection form and process)
- Rental unit/Multifamily documentation and process compliance
- Energy Audits (Process and Documentation - Weatherization Assistant Audit Program Libraries, inputs/usage, adherence to guidance, etc.)
- Weatherization of Units (all work performed on dwellings – HVAC, shell measures including insulation and air sealing, baseload measures, etc.)
- Zonal and Pressure Diagnostics on all dwelling types
- Health & Safety (HVAC, LSW compliance, ASHRAE 62.2 2016 ventilation requirements, mold/moisture, electrical, etc.)
- Final Inspections/Quality Control process and documentation
- Client interaction and client education process

Field monitoring incorporates all new DOE mandated regulations, e.g., ASHRAE 62.2-2016 (and any applicable updates when implemented), Zonal Pressure Diagnostic standards, and Combustion Appliance Zone testing compliance. Also, in compliance with DOE WPN 15-4, all field monitoring inspections will be performed by a certified HEP QCI and the monitoring inspection form will include a signature of the monitor(s), to supplement the client file and subrecipient QCI form.

Field monitors will utilize DBA FACS Pro as the monitoring tool. DBA FACS Pro is programmed to randomly pull clients to increase transparency for monitoring visits through the Monitoring/Training Module.

### **Fiscal Monitoring**

- Financial Policies and Procedures
- Cash Management
- Procurement policies and practices
- Financial management of Material Inventory
- Financial management of Property and Equipment
- Contracts/Sub-awards
- Payables/Receivables/Expenses Management
- Invoicing and Reporting accuracy
- Review of Funding Requests and specific line items/expenses for accuracy and proper documentation
- Bank records and reconciliation
- Financial Statements
- Internal Controls
- Financial Management of utility (leveraged) funds
- Single Audits (See A-133 Financial Audits (2 CFR 200 Subpart F))

### **A-133 Financial Audits (2 CFR 200 Subpart F)**

WVDO will verify when the audit was submitted to the Federal Clearinghouse (FAC), and note this on the “Annual Audit Chart,” maintained by the WVDO Fiscal Compliance Monitor. If the subrecipient did not submit the audit to the FAC by the deadline as per Federal regulations, WVDO mails a reminder letter to the subrecipient.

The WVDO Fiscal Compliance Monitor will review all audits using the “WVDO Pass-through entity Audit Review Checklist.” An “Audit Review Summary” is completed for the audit, and maintained on WVDO’s shared drive. Depending on the results of the review, WVDO forwards to the subrecipient either (1) a letter indicating no findings, or (2) a letter requesting a Corrective Action Plan (CAP). The subrecipient has six (6) weeks to submit a CAP if applicable.

If a subrecipient has not submitted the CAP within the deadline, the CAP “Reminder E-mail” will be forwarded to the Executive Director. Upon receipt of the CAP, WVDO will review and forward to the subrecipient either the (1) “CAP Acceptance E-mail” or (2) another correspondence requesting modification to the CAP. As per 2 CFR 200, as a Pass-through entity, WVDO is required to follow-up/issue a management decision for Federal award findings related to the programs WVDO administers.

Currently, all WAP subrecipients expend more than \$750,000 in Federal funds in a fiscal year and thus are required to have a Single Audit.

## **Desk-Top Monitoring**

WVDO will also conduct periodic off-site, desk-top monitoring utilizing the database management system used to track all weatherization work, at times coupled with the statistical management tool and related analytical spreadsheets used to track production, expenditures, and other performance indicators. This process will serve as a pre-monitoring activity as well as routine review and oversight as needed. The desk-top monitoring activity is utilized to confirm that measures are performed and tracked according to program standards, and that diagnostic and health and safety tests are performed and documented correctly. It is also used to ensure all documentation for a client and dwelling are maintained and completed properly and accurately. This process allows for the identification of trends that may convey a training need, or specific jobs that may need to be monitored due to documentation of measures. The development of the database management system over the last several programs years greatly increased WVDO desk-top monitoring capabilities to increase efficiency and effectiveness of monitoring, as well as to reduce expenses. WVDO will continue to use these enhanced capabilities for the current Program Year.

## **Desk-Top Monitoring Schedule**

Desk-top monitoring will be performed on a quarterly basis. Desk-top monitoring will be conducted through the DBA FACS Pro Monitoring/Training Module. Field Monitors will choose a single item to review. Examples of desk-top monitoring items include: Deferrals, QCI Form completion, Income verification, etc. Jobs will be chosen at random by the DBA FACS Pro Monitoring Module and the reviewing monitor(s) will be on a rotating quarterly basis.

Subrecipients will receive e-mail notification once the desk-top monitoring has been completed. The notification will have instructions on how to respond to the monitoring. The individual issues will be addressed per subrecipient with required actions for compliance if applicable.

## **Monitoring Staff**

Monitoring will be performed by several WVDO staff members with differing credentials and areas of expertise to effectively monitor all the various components of the WV WAP as outlined above. Monitoring staff members may monitor more than one (1) component. The monitoring process and the different components are managed and overseen by a Compliance Manager. The WV WAP Manager reviews and approves each report. The current WVDO monitors are as follows:

### *Programmatic and Management Monitors (Administrative Monitors):*

- 1 Weatherization Assistance Program Manager
- 1 Weatherization Assistant Administrator

**Qualifications:** The qualifications of the Programmatic and Management Monitors (Administrative Monitors) include extensive experience with the weatherization program (both at the Pass-through entity level and subrecipient level) as well as certifications and education



that benefit the monitoring team as they oversee and evaluate the subrecipient management of the weatherization program. The staff members have experience in management and finance/accounting.

*Field Monitors (Technical Monitors):*

- 2 Weatherization Specialists (Field/Technical)
- 1 Weatherization Specialist (Field/Technical – New Hire)

**Qualifications:** The qualifications of the Field Monitors (Technical Monitors) include extensive experience with the weatherization program as well as extensive building science knowledge. The Field/Technical monitors have several BPI certifications (including HEP QCI), Weatherization Assistant Training Certificate, as well as multiple WV WAP specific certifications that are now superseded by HEP or other state/national certifications, but still provide a strong foundation of knowledge; (Energy Auditor, Quality Control Inspector, multiple HVAC certifications) as well as attendance to regional and national energy conferences. The newly hired Field Monitor is currently attending trainings at Community Housing Partners in Christiansburg, VA, to prepare for Energy Auditor and Quality Control Inspector Certification testing. This individual has an extensive background in construction, HVAC, and has a Journeyman’s Electrician License. As previously stated, all field monitoring inspections will be performed by a certified HEP QCI at the Pass-through entity level.

*Fiscal/Financial Monitors:*

- 1 Weatherization Assistance Program Assistant Manager
- 1 Compliance Unit Manager

**Qualifications:** The qualifications of the Fiscal/Financial Monitors include education (bachelor’s and master’s level) and experience in the accounting, finance, and management fields, as well as knowledge of Federal financial requirements. Some of the monitoring staff experience is specifically with the Weatherization Assistance Program both on the Pass-through entity and subrecipient levels. The Fiscal/Financial monitors will also utilize WVDO’s Chief Financial Officer (CFO) and experienced accounting staff as additional resources during the monitoring activities as needed.

WVDO staff have received multiple 2 CFR 200 Uniform Guidance trainings, with the Weatherization Program Manager attending a refresher OMB Uniform Guidance training in Dublin, OH, in April 2018. WVDO will continue to seek additional training on the new regulations if/when necessary. WVDO will pursue additional certifications as identified and/or needed as the Program Year progresses.

**Monitoring Expenditures:**

Monitoring staff members will be paid out of the Training and Technical Assistance (T&TA) budget category with the exception of the Fiscal Monitor and WAP Manager who will be paid out of the Administrative budget category given the nature of their work in relationship to the

organization and other programs they work within. A percentage of the Fiscal Monitor will be paid out of the T&TA budget category. WVDO has budgeted \$16,251 out of DOE funds for travel expenses related to monitoring activities. These funds will be supplemented by LIHEAP funds.

### **Monitoring Schedule:**

The monitoring schedule will follow a basic plan of one (1) or two (2) Programmatic, Field, and Fiscal monitoring visits performed per month for the twelve (12) subrecipients. This varies throughout the year due to when WVDO starts the monitoring process for the Program Year. In coordinating the monitoring schedule WVDO also considering holidays, subrecipient leave time, etc.; therefore, some months have one (1) visit, and some have two (2).

WVDO will strive to set the monitoring schedule for the Program Year within the first quarter (July-September) of the DOE grant cycle. WVDO will disseminate a preliminary schedule to the Weatherization Network and ask subrecipients to confirm the proposed monitoring dates for their organization or ask for different dates if conflicts exist.

If conflicts arise after the final monitoring schedule is set for the Program Year, WVDO asks that subrecipients inform WVDO as soon as possible. At a minimum, subrecipients must notify WVDO within 48 hours of the receipt of the official monitoring notification.

WVDO avoids scheduling visits during back-to-back weeks when possible so that WVDO monitoring staff can work to finalize reports and adequately prepare for the next visit. This plan is only tentative as visits to a subrecipient could increase if there are serious deficiencies identified. The scheduling of the subrecipients will depend in part on when their last visit occurred as well as reasonably taking into consideration geographic location and time of the year. Also, any subrecipients that had major or repeated deficiencies identified from the PY 2017 – 2018 monitoring process and have not had a follow-up visit (due to deficiencies being identified toward the end of PY 2017 – 2018) will be first priority in PY 2018 – 2019, with additional reviews scheduled as necessary until deficiencies are corrected.

### **Pre-Monitoring Procedures**

WVDO will provide timely notification of monitoring to subrecipients and complete some parts of the monitoring prior to arriving onsite for monitoring. Those activities include:

- Distribution of official notifications of monitoring at least thirty (30) days prior to on-site monitoring by e-mail to Executive Director/CEO, CFO/Finance Director, and WAP Coordinator. Official notifications will direct the subrecipient how to prepare for the review and WVDO's expectations. The subrecipient should confirm receipt of the notification and respond within 48 hours if the dates for monitoring need to be changed for any reason.

- During the week before the scheduled on-site visit, the WVDO monitoring team will confirm arrival times and arrange any necessary logistics.
- An assigned field/technical monitor will contact the subrecipient with a job monitoring pool to schedule jobs to be monitored at least one (1) week prior to on-site monitoring.
- Monitors will conduct desk-top reviews of relevant information to increase efficiency on-site.

## Visit

A typical visit can be expected to require three (3) to five (5) days on-site. The on-site visit process will include the following:

- An entrance interview during which any concerns or questions about the review can be discussed between WVDO and subrecipient staff.
- Requests of documentation for review including, but not limited to, subrecipient policies and procedures, program documents, client files, and financial records.
- Conducting interviews with program staff regarding program operations and job functions.
- Conducting interviews with administrative and fiscal staff.
- Inspecting completed weatherized dwelling units.
- Inspecting Weatherization assets including but not limited to warehouse(s), material inventory, tools, equipment, and vehicles.
- Offering a daily update to the subrecipient regarding the progress of the review and issues that have already been found.

The staffing and credential make up of a subrecipient will determine the number of completed dwelling units needing to be visited by WVDO as per DOE WPN 15-4. For subrecipients that have an independent QCI, WVDO will monitor at least five percent (5%) of completed dwelling units. For subrecipients that have an Auditor that also performs the functions of QCI, WVDO will monitor at least ten percent (10%) of completed dwelling units. This percentage will increase based on issues identified and/or capacity of WVDO staff. WVDO will also review units “in progress” beyond the five (5) or ten (10) percent completed units respectively, in order to assess: quality and compliance; appropriate and allowable materials; appropriateness and accuracy of energy audits; final inspections; safe work practices, such as lead safe weatherization protocols; and other factors that are relevant to on-site work.

An important continued focus of WV WAP subrecipient monitoring for PY 2018 – 2019, will be the supplemental components to the Weatherization Program, including but not limited to the utility partnership programs, and LIHEAP components including the Energy Crisis Intervention Program (ECIP), the Electrical Upgrade Component, and the Weatherization Related Home Repair Component. These projects provide additional funding for the WV WAP, enable additional work to be done on a large percentage of weatherized homes, and make possible the

weatherization of some homes that may have had to be deferred because of necessary repairs that are outside the scope of the DOE WAP. WVDO will also monitor any other components that are developed and approved as additional appropriate LIHEAP measures. Monitoring of the supplemental components will be part of the standard monitoring process (unless determined necessary to do otherwise) focusing on the correct utilization, tracking, and accountability of the supplemental component funds. WVDO will take advantage of desk-top monitoring opportunities as appropriate for additional components of the WV WAP.

Upon the completion of each monitoring visit of any of the three (3) components, an Exit Conference is held between the members of the subrecipient (as selected by the subrecipient management) and the monitoring staff to discuss strengths, weaknesses, deficiencies, call-backs, and monitor recommendations. As per DOE WPN 16-4, within thirty (30) days after each visit, WVDO will prepare a written report for the subrecipient that describes the current monitoring assessment (identification any deficiencies, recommendations, commendations, and best practices) and any corrective actions as part of a QIP, if applicable. A draft of this report is provided during the Exit Conference and then finalized by WVDO staff following the visit. A subrecipient typically has thirty (30) days to respond with a QIP unless the nature and severity of findings deem a more expedient response. If the subrecipient does not respond within the required time limit, the subrecipient is notified and disciplinary or punitive actions may be taken if the subrecipient does not comply with the requirement to submit a QIP.

#### **Process of Corrective Action, Discipline and/or Removal of a Subrecipient from the WAP**

WVDO has a system in place to review each QIP provided by the subrecipients either approving of the plans made or requiring additional information or actions. Regardless of monitoring focus, WVDO follows up with each subrecipient to ensure that the corrective actions outlined in the plan have been implemented either through a subsequent monitoring visit and/or desk-top review, or requiring the submission of documentation confirming the corrections. WVDO will offer and provide training and technical assistance if requested and appropriate response to a QIP. If a subrecipient's response is to contest an identified deficiency, WVDO will either sustain or revise its initial deficiency and provide additional guidance or instructions.

WVDO increases visits (both the number of units reviewed and the frequency of monitoring visits) to the subrecipient until it can be assured deficiencies are resolved. If necessary, WVDO has implemented a system of monitoring every potential job prior to submission as a completion for a subrecipient if sustained compliance cannot be demonstrated. If significant deficiencies are discovered, such as health and safety violations, poor quality installation of materials, major measures missed, then the subrecipient must take appropriate corrective action(s) to resolve the outstanding issues in a timely manner. If health and safety issues are found that present an immediate danger to people in the home, the subrecipient must immediately resolve the issues.

If subrecipient noncompliance or repeated unresolved deficiencies (based on a minimum of two (2) monitoring visits at a subrecipient) will be reported to the DOE Project Officer.

Sensitive or significant noncompliance deficiencies, such as waste, fraud, or abuse must be reported to DOE immediately by WVDO.

Once the deficiencies are corrected and procedures are put in place to prevent reoccurrence, WVDO will resume the original percentage sampling of that particular subrecipient's work in subsequent monitoring visits.

If repeated monitoring and technical assistance do not correct identified noncompliance issues or if a subrecipient continuously fails to respond to an identified deficiency, WVDO will begin the process of disciplinary action which will include the imposition of additional requirements. Subrecipients will be informed of the nature of additional requirements, the reason why additional requirements are being imposed, the actions needed to remove the additional requirement, and the time allowed for completing the actions, if applicable. Depending on the type of noncompliance issues, actions and additional requirements may include but are not necessarily limited to:

- Withholding disbursement of grant funds until noncompliance issues are corrected
- Disallowing completions that do not meet program standards
- Placing the subrecipient on an "At Risk" status
- Suspending part or all of the program for the subrecipient
- Asking the subrecipient to voluntarily relinquish the program
- Removing part or all of the program from the subrecipient
- Requiring payments as reimbursement rather than advance payments
- Requiring all weatherized dwelling units to be inspected by a third party before being turned in for completions
- Requiring additional, more detailed reporting
- Establishing additional prior approvals

Once the noncompliance issue that caused WVDO to take disciplinary action and impose additional requirements is resolved, WVDO will promptly remove the additional requirements. The subrecipient will be notified of the removal in writing.

If a subrecipient wishes for WVDO to reconsider the imposition of additional requirements, the subrecipient must provide in writing within two (2) weeks of being informed of additional requirements the following:

- Detailed reason why WVDO should reconsider imposing additional requirements
- Evidence that the issue of noncompliance has been satisfactorily resolved
- A plan to prevent similar issues of noncompliance going forward

Within thirty (30) days of receiving the above information from a subrecipient, WVDO will either sustain or remove the additional conditions and disciplinary actions imposed.

## **WAP Grant Award Termination**

If WVDO determines that all remedies for noncompliance and training and technical assistance opportunities have been exhausted in an effort to correct an issue of noncompliance, or definitive waste, fraud, or abuse were uncovered during the course of monitoring, the subrecipient's WAP grant awards will be terminated. WVDO will provide the subrecipient with written notification of termination and cause of termination.

If a subrecipient wishes to contest a termination action, they must provide WVDO with information and documentation showing that the cause of termination had been remedied or conditions as understood by WVDO that caused the termination were not accurate within one (1) week of being informed of the termination action. WVDO will respond in thirty (30) days either sustaining or reversing the termination action.

## **Tracking & Analysis**

The subrecipient monitoring process from notification to final approval and confirmation of corrective actions is tracked by WVDO to final resolution in a "Monitoring Log." WVDO also tracks the most significant deficiencies in a "Root Cause Analysis" spreadsheet to evaluate and analyze trends of the subrecipients' performance. In PY 2016 – 2017, WVDO added the tracking of Strengths, Weaknesses, Best Practices, and Other Needs for more efficient analysis from more information readily available and organized. This process continues to allow for the identification of training and technical assistance needs and is an evaluative tool used to keep both WVDO and the subrecipients on a path of continuous improvement.

## **V.8.4 Training and Technical Assistance Approach and Activities**

Training & Technical Assistance (T&TA) funding is used to pay salary, travel, and operational costs for WVDO staff to provide monitoring/T&TA to subrecipients. Subrecipient expenses for participation in T&TA activities (including special conference attendance) will be funded from DOE T&TA and/or other funds including LIHEAP. T&TA activities are intended to maintain or increase the efficiency, quality, and effectiveness of the WAP at all levels and are designed to maximize energy savings, minimize production costs, improve program management and field "quality of work," and/or reduce the potential for waste, fraud, abuse, and mismanagement.

WVDO assesses training needs regularly as part a constant process as the PY progresses. This process and the related training plan are flexible and WVDO incorporates information from the process into the training plan as needed. WVDO assesses T&TA needs of its subrecipients through these avenues:

- WVDO monitoring efforts
- Internal trend analysis
- Training Needs Assessment Surveys

- Prompts in subrecipient grant applications
- Communication with national experts regarding new technologies and/or standards/practices
- Communications with DOE Project Officer
- Guidance as provided by the Department of Energy (DOE) including industry-wide initiatives and future program requirements (certifications, health and safety implementation, etc.)
- Monitoring visits from the DOE Project Officer, DOE contracted representatives, or the Office of Inspector General

## Overview

The WV WAP supports subrecipients to seek appropriate trainings pursuant to achieving required certifications and to enhancing their credentials and skill in work practices associated with weatherization work. Trainings and certifications have and will continue to be provided by Interstate Renewable Energy Council (IREC) accredited and certified Weatherization Training Centers (WTCs) within close proximity to West Virginia. There are no IREC WTCs within the State of West Virginia; in several proximal states, there are either IREC-accredited WTCs or IREC-certified individuals who are not attached to WTCs. The WV WAP is prohibited from encouraging subrecipients to choose one (1) vendor among equivalent potential vendors of the State of West Virginia. Therefore, the emphasis in helping subrecipients to plan trainings will be in providing timely notifications of training opportunities offered by a variety of relevant entities; asking subrecipients to choose the providers whom they deem will best meet their training needs; and then helping subrecipients to schedule trainings which meet them.

Training and certification will continue to be offered to the Weatherization Network in PY 2018 – 2019 for recertifications as well as for additional staff. Training priorities have been identified in concert with subrecipients via several mechanisms as bulleted above. In particular, the WV WAP is paying attention to subrecipient needs for HEP QCI recertifications and CEUs as the program enters PY 2018 – 2019. Also, with the upcoming revisions to Energy Auditor (EA) and Quality Control Inspector (QCI) examinations/positions, WVDO will encourage and approve all available trainings for the EA classification. CAZ and Duct Testing (both Tier 2) are some of the trainings planned for gaining CEUs toward QCI.

**Other major areas of focus this Program Year:** In addition to the effort at training, certifying and recertifying QCIs and EAs as described above, there are several other planned areas of focus for training and credentialing subrecipient staff. Four (4) other areas of first priority include: (1) Providing guidance on the ASHRAE 62.2-2016 ; (2) Keeping up Lead Renovator Certifications and Lead Renovator Refresher Certifications; (3) Providing guidance on the WV WAP Standard Work Specifications (WV WAP SWS) functioning as the West Virginia Weatherization Standards/Field Guide, changes and updates; and (4) Helping subrecipients to establish training and testing dates for HVAC Technician and Electrical licenses pursuant to W. Va. Code 21-16-1, *et seq.*, and W. Va. Legislative Rule 42-34-1, *et seq.*

Three (3) areas of second priority include: (1) Providing ongoing training and recertification of Energy Educators; (2) Providing training in the use of Weatherization Assistant 8.9 for effective NEAT and MHEA analyses; and (3) Connecting subrecipients to HVAC Advanced trainings.

Ongoing training priorities which are regularly needed for the continuance of expert provision of weatherization services, but which at the time of writing are less urgent, fall into two (2) general categories – other Home Energy Professional (HEP) certifications and New Hire/Basic Weatherization trainings. (A) In the first category, in addition to the HEP QCI and EA designations already discussed, the other two HEP certifications conferring industry and DOE recognition of competencies for energy upgrade professionals are (1) HEP Retrofit Installer/Technician, and (2) HEP Crew Leader. Several subrecipients have attended Retrofit Installer/Technician and other subrecipients plan to do so in the upcoming PY 2017 – 2018. Fewer have attended Crew Leader; yet depending on funds availability, the WV WAP will continue to support efforts toward subrecipient staff achieving Crew Leader certification as part of the full suite of four HEP certifications that designate someone as a Home Energy Professional (HEP). (B) In the second general category of ongoing training priorities, trainings in basic building and weatherization techniques include a collection of New Hire Requirements (including online offerings, such as Retrofit Installer Technician and HVAC Fundamentals), various basic weatherization (including online offerings), and Builders Boot Camp.

### **Descriptions:**

#### HEP QCI/HEP EA (Tier 1)

As previously mentioned, WVDO will be offering additional HEP QCI training and certification opportunities as well as HEP EA training and certification as funding allows. WVDO understands that some subrecipients need more than one (1) certified QCI due to size, service territory, and jobs requiring completion, and/or crew make-up.

As of April 1, 2018, all program personnel (Pass-through entity and subrecipient) performing inspections on completed dwelling units were HEP QCI Certified. Eleven (11) subrecipient weatherization providers have at least one (1) HEP QCI Certified staff, and several had more than one (1). One (1) subrecipient currently is using an out of state certified HEP QCI to ensure that all dwelling units completed are inspected by a certified HEP QCI. This subrecipient does have a staff member currently in training to become HEP QCI certified.

Also, as previously mentioned, WVDO encourages subrecipients to pursue the HEP EA certification even though it is not yet a requirement due to the value of the knowledge and certification given the importance of the position to a strong program. WVDO will also fund opportunities during PY 2018 – 2019 for Pass-through entity and subrecipient staff to retain their current HEP certifications by obtaining Continuing Education Units (CEUs).



### ASHRAE 62.2-2016 (Tier 2)

Although this is a Tier 2 training, its recent revisions warrant its priority status. Some subrecipients have likewise identified it as a germane topic for updated training. Moreover, in the most recent monitoring visit by a U.S. DOE Field Monitor in PY 2016 – 2017 (November 2016), the Field Monitor determined multiple instances of misunderstandings by clients and subrecipient staff about proper equipment to meet the ASHRAE 62.2-2013 standard; its proper installation; and its proper use. Monitorings for PY 2017 – 2018 showed a continued need for ASHRAE 62.2 2016 training, as several subrecipients received Field Deficiencies even after attending training.

The WV WAP will seek appropriate resources for providing this training to subrecipients, as well as review monitoring reports to determine which subrecipients may need additional targeted assistance in implementing ASHRAE 62.2-2016 standards.

### Lead Renovator and Lead Renovator Refresher Certifications (Tier 1)

In order to become a certified lead renovator, subrecipient staff must complete training from an EPA-accredited training provider. These trainings were developed to educate professionals in home and other fields about the lead safe work standards contained in U.S.C. 2681 et seq., and 40 CFR 745.80 et. seq., and the EPA 2008 Lead-Based Paint Renovation, Repair and Painting (RRP) Rule (amended in 2010 and 2011).

Recertification is required every five (5) years. Currently, the WV WAP requires that each subrecipient have at least one EPA Lead Renovator certified staff person. All twelve (12) subrecipients have certified lead renovators on staff. Several subrecipients have identified these trainings as priorities for PY 2018 – 2019.

### State Weatherization Standards (Tier 1)

The WV WAP Network will be utilizing the DOE approved WV WAP SWS during PY 2018 – 2019. WVDO Field Monitors have continued to update the WV WAP SWS Single Family and Manufactured Home SWSs in preparation for DOE approval prior to January 7, 2019. (WV SWS Expiration Date) Any additional variances identified will be sought utilizing the proper DOE approval process. The WV WAP will undertake a review and survey of priority work practices in the SWS to be addressed in trainings from which subrecipients could maximally benefit. Also, based on individual subrecipient requests, specific focal areas for WV WAP SWS training; technical assistance; or clarification will be provided as needed.

WVDO will document the verification of receipt and usage of the WV WAP SWS by the subrecipient as required by DOE WPN 15-4, using the subrecipient WAP Grant Agreements.

### HVAC Technician Certification Class 1(Tier 1):

During the 2015 West Virginia State Legislature, an addition to the existing state requirements for HVAC businesses and technicians was added (W. Va. Code 21-16-1, *et seq.*, and W. Va. Legislative Rule 42-34-1, *et seq.*). As of January 1, 2016, all individuals working on heating systems were required to have a HVAC Technician License from the West Virginia Commissioner of Labor. Individuals in West Virginia who engage in the business of installing, erecting, testing, repairing, servicing or altering heating, ventilating and air conditioning equipment or systems to heat, cool or ventilate residential structures, are required to have an HVAC Technician License when the project exceeds \$1,000.

With this new State requirement, the former administering agency, WVOEO, decided to re-certify the subrecipient HVAC Technicians, using the West Virginia Contractors Licensing Board regulations. Normally, individuals seeking to obtain an HVAC Technician Certification are required to sit for an HVAC exam. However, the West Virginia Contractors Licensing Board grandfathered (or opted out of the exams) those applicants who presented satisfactory evidence of having at least two thousand hours (2,000) of experience and/or training working on HVAC systems and at least six thousand hours (6,000) of experience and/or training in HVAC systems and related work which includes other sheet metal industry tasks. The opting out period expired on July 1, 2016.

Those individuals who do not have the required hours can register as an HVAC Technician in Training. Subrecipients must have a 1:1 ratio of Certified HVAC Technicians to Technicians in Training Class 2. Once a Technician in Training has the required hours, unless she/he is still within the opting out phase, the individual must pass the HVAC exam. All subrecipients were contacted in September 2015, and had at least one (1) person who could be grandfathered in (or opted out). WVDO coordinated with subrecipients to apply for both HVAC Technician and Technician in Training Licensing with the West Virginia Commissioner of Labor. HVAC certifications are renewed every year through the West Virginia Commissioner of Labor. Since September 30, 2016, it is mandated that HVAC work cannot be performed by subrecipient staff who do not have the proper West Virginia HVAC Technician or Technician in Training certification.

Certification will continue throughout the PY 2018 – 2019 as new HVAC Technicians in Training Class 2 are hired and current ones become eligible to apply for HVAC Technician Class 1. Unfortunately, there is a wait period for available slots for testing seats, which has become problematic for some subrecipients. The WV WAP will continue the conversation with necessary entities to try to reduce the wait time.

### Client Education (Tier 2)

Energy Education of clients is one of the most important weatherization processes to ensure the maximum effectiveness of installed weatherization measures. Each subrecipient has identified at least one (1) Energy Educator, several whose certifications have expired however;

various subrecipients have identified Client Education as a priority in PY 2018 – 2019. In 2015, the former administering agency, WVOEO, began an effort to recertify all Energy Educators through online training provided by an IREC-accredited WTC. This effort is continuing. This course is designed to assist the student in acquiring adult education skills to establish an effective means of communication between the Energy Educator and the client. The online Client Education course prepares students to develop a strategy for effective client education from pre-approval to quality assurance. Videos and documents are presented to use with clients to ensure that they get the information they need during the client education process. After each topic is presented, a short self-quiz follows each section and feedback is given. A final test consisting of a single multiple choice-true/false exam is given at the end of the course. For certification, the student must pass this final exam. After passing the certification test, the Energy Educator will work with clients to effect change in poor energy conservation habits.

The Energy Educator utilizes a tabletop easel with energy saving and maintenance tips for weatherization measures. The process is intended to be interactive between the Energy Educator and client. A key element of the process is a "contract" called the Energy Savers Partnership Plan, where the client agrees to do certain actions to conserve energy in their home. WV WAP has also received materials and guidance from utilities partners to improve the client energy education process.

Energy Educator Certification will continue to be on an as needed per person basis. An Energy Educator must renew their certification every five (5) years.

### New Hire Requirements (Tier 2)

WVDO has designed a curriculum of online courses and videos, as a requirement for all new hires at the subrecipient level for the WV WAP. This set of trainings will introduce a new employee to the WV WAP and familiarize them with the program and process. Each new hire will be required to complete all courses during the first six (6) months of employment. These trainings are designed as an introduction to the job of the retrofit installer technician which is the entry level position in the weatherization field, and provide a basic understanding of the WV WAP. These trainings will give students an overview of what is expected of a retrofit installer technician on the job site, knowledge of the use of the basic tools of weatherization, and an understanding of basic building science.

The following is a listing of courses for a new hire retrofit installer technician:

- “This is the World of Weatherization” - Video
- Retrofit Installer Technician – On-line course
- HVAC Fundamentals – On-line course
- Blower Door Basics: Part 1 – Prep & Setup - WxTV
- Blower Door Basics: Part 2 – The Test Process - WxTV
- Blower Door Basics: Part 3 – The Breakdown - WxTV

These courses will be available all year on an “as needed” basis for current, new subrecipient staff, or additional crew staff to be hired in the upcoming PY 2018 – 2019.

### Healthy Homes Specialist (Tier 2)

It has long been known that there is a connection between health and housing. The DOE Weatherization Plus Health initiative is a national effort to enable the comprehensive, strategic coordination of resources for energy, health, and safety in low-income homes. One (1) subrecipient has continued the Healthy Homes program, and one (1) WVDO staff member has renewed the certification. Healthy Homes Specialists must renew their certification every two (2) years and therefore WVDO will monitor the one (1) subrecipient to ensure certifications are retained by staff, if necessary/requested during this Program Year.

### **Approach**

In PY 2018 – 2019, WVDO is pursuing an “as needed, per person” approach as subrecipients anticipate hiring new staff throughout the year; as current certifications and licenses expire at different times throughout the year; and as subrecipients demonstrate and express different specific deficiencies and needs for improvement. Also, there is less need for certified staff in certain positions as subrecipients are now just fulfilling needs for additional staff, already some having recently received certifications (ex: EA, QCI).

WVDO will make available Tier 1 and Tier 2 trainings to the Weatherization Network during the entire year. Subrecipients have requested more flexibility in scheduling training when needed in order to better accommodate production. Instead of a series of set classes, which sometimes takes crews away from production for longer periods that may burden an organization, subrecipients will have the ability to fit trainings into their respective schedules. WVDO will set time frames for completions of required certifications for subrecipients to continue operating the WV WAP and to ensure that subrecipients plan and meet expectations during the year. WVDO also tracks all required licenses needed by subrecipients to properly perform work within the WV WAP (West Virginia HVAC Electrician License, West Virginia Single Family Dwelling Electrician License, EPA Section 608 Refrigerant Transition Technician Certification, HVAC Contractor License, etc.) and WVDO will ensure that all subrecipients remain current with all WV WAP required licenses.

Attendance for all Tier 1 and 2 trainings is mandatory for the appropriate program personnel unless extenuating circumstances exist and approval is received from WVDO.

WVDO will continue to use a previously implemented *Subrecipient Training Request and Reimbursement Policy*, which establishes uniform guidelines for internal WVDO documentation and tracking of training; technical assistance; workshops; certifications; and licenses within the WV WAP, as well as the funding or reimbursement process for said trainings, as applicable.

Trainings will be determined through direct discussions between the WV WAP staff and subrecipients, assessment, monitoring, internal analysis and requests from subrecipients. All requests for training from subrecipients will be submitted utilizing the WVDO website (currently still at [www.oeo.wv.gov](http://www.oeo.wv.gov)) by submitting a “Subrecipient Training Request Form.”

Trainings will be presented in various venues and settings including traditional classroom settings, on-site/hands-on opportunities, and online/web based sessions.

Subrecipients are required to submit a list designated by quarters of any anticipated WAP-related T&TA needed to meet standards as part of the 2018 – 2019 Grant Application process. This list will ensure at the beginning of the Program Year that an estimated needs list is captured for the subrecipient for proper planning throughout the year. WVDO has reviewed these planning/needs lists and incorporated them into a “Training Event Status Tracking Log” and a “Training Plans and Funds Snapshot,” for the purpose of forecasting subrecipient training needs and priorities for PY 2018 – 2019. Both are updated weekly and, in conjunction with the original planning lists, provide a sound basis for timely discussions with subrecipients about needs, adjustments, and scheduling relevant trainings. A “Training Tracking Chart” has been developed to track each subrecipient’s staff member in a spreadsheet format.

Expirations of certifications and licenses are primarily tracked during program monitoring of subrecipients and in subrecipient grant applications. Also at any time, in its database management system shared with subrecipients, WV WAP staff can generate a table showing this information for any subrecipient or subrecipient staff member. This chart tracks expiration dates on certifications/licenses, and requests from subrecipients on trainings, certifications/licenses and other information needed to plan for upcoming trainings. This chart is updated on a regular basis, as requests for training, certifications/licenses become due, or findings are documented in monitoring reports, and is compared to the database management system that tracks trainings and certifications as entered by subrecipients.

Requested/planned training during the subrecipient application process must be completed as planned barring extenuating circumstances. The “Training Tracking Chart” is reviewed and WVDO and subrecipients work together to complete the requested trainings in a timely manner. In this way, certification renewals should not lapse and funds are spent by the end of the Program Year.

### **Training Time Line for PY 2018 – 2019**

As has been the practice for several program years, WVDO will continue to pursue an “as needed, per person” approach as subrecipients anticipate hiring new staff throughout the year, and as current certifications and licenses expire at different times during the year.

WVDO will make available Tier 1 and Tier 2 trainings to the weatherization network during the entire year, utilizing WTCs and other sources. These trainings/certification and renewals are:

- HEP BPI Quality Control Inspector (Tier 1)
- HEP BPI Energy Auditor (Tier 1)
- HEP BPI Retrofit Installer/Technician (Tier 1)
- HEP BPI Crew Leader (Tier 1)
- Initial Lead Renovator Certification (Tier 1)
- Lead Renovator Refresher Recertification (Tier 1)
- EPA section 608 Training (Tier 2)
- ASHRAE 62.2-2016 New Rule (Tier 2)
- NREL/BPI and WV WAP SWS (Tier 1)
- HEP CEUs (Tier 1)
- Healthy Homes Specialist CEUs/Recertification (Tier 2)

While Tier 1 and Tier 2 trainings are available during the PY, there is still a need for benchmarks, assessment, and adjustments, to ensure that subrecipients are receiving the necessary training/certifications to operate a weatherization program. Records of trainings, certifications, and licenses are kept in the data management system and supplemented with the information from the *Training Event Status Tracking Log*. The WV WAP staff intend to make a concerted effort to engage in direct conversations with subrecipients to determine and adjust training needs throughout the Program Year.

During the First Quarter of the Program Year, a combination of funding will be utilized for T&TA. DOE funding will be used; however, LIHEAP funding will also be used for training costs, as approved by West Virginia DHHR, West Virginia's LIHEAP Grantee. The combination funding will support the trainings listed above and these additional trainings:

#### **First Quarter – July 1 through September 30, 2018**

- HEP BPI Quality Control Inspector Recertification (Tier 1)
- HEP BPI QCI CEUs (CAZ, Duct testing) (Tier 2)
- HEP BPI Energy Auditor Certification/ Recertification (Tier 1)
- HEP EA CEUs (i.e., Building Analyst) (Tier 1)
- ASHRAE 62.2-2016 (Tier 2)
- Lead Renovator Certification (Tier 1)
- Lead Renovator Refresher Recertification (Tier 1)
- NREL/BPI and WV WAP SWS (Tier 1)
- HVAC Technician Class 1
- HVAC Technician in Training Class 2
- WV WAP State Plan PY 2018 – 2019 Meeting (Tier 2)
- Weatherization Assistant 8.9 software for NEAT/MHEA (Tier 2)

## **Second Quarter & Third Quarter – October 1 through December 31, 2018 & January 1 through March 31, 2019\***

- Energy Educator (Tier 1)
- HEP BPI Energy Auditor Certification/ Recertification (Tier 1)
- New Hire Requirements (Tier 2)
- Retrofit Installer/Technician (Tier 1)
- West Virginia HVAC Electrician License
- West Virginia Single Family Dwelling Electrician License
- West Virginia Journeyman’s Electrician License
- West Virginia Apprentice Electrician License
- Heating Unit Inspection (Tier 2)
- Respirator Fit testing (Tier 2)
- Healthy Homes Specialist CEUs/Recertification (Tier 2)

\*An assessment of the success of Quarter 1 training, regarding scheduling and implementation efforts will determine the objectives for Quarters 2 & 3.

## **Fourth Quarter – April 1 through June 30, 2019**

The Final Quarter activities will continue with trainings and certifications on an as-needed, per person/subrecipient basis.

### **Credentials/Certifications/Licenses**

WVDO places great emphasis on maintaining workforce credentials for both WVDO and subrecipient staff. Credentials, certifications, licenses, and certificates are all tracked for WVDO and subrecipient staff in the database management system. Credentials, certifications, licenses, and certificates are reviewed and training, continuing education, re-testing, etc., is planned and performed as necessary to ensure WVDO and subrecipient staff maintain all necessary credentials.

WVDO has implemented an internal *Standard Operating Procedure-WV WAP Training Policy* to establish uniform procedures for documentation and tracking of certifications, licenses, training, technical assistance and workshops within the WV WAP, as well as the funding or reimbursement process for said trainings as applicable.

WVDO Weatherization Specialists must maintain proficiency on new methods and techniques pertinent to the WAP. WVDO Weatherization Specialist staff must maintain levels of knowledge aligned with the Weatherization industry as well as State and National Standards, and are also furnished with all State and Federal regulations as they are updated and released. At this time, two (2) WVDO Weatherization Field Specialists are currently certified as HEP QCIs and BPI Certified with Building Analyst and Envelope Professional certifications as well.

The WV WAP understands the direction that the DOE WAP is moving with regards to the requiring of national certifications. The WV WAP participated in the NREL/BPI Pilot Program that was implemented in partnership with WV WAP and DOE. The WV WAP had workers tested on QCI Certifications as well as EA Certifications. As funding allows, the WV WAP will continue to pursue HEP Certifications for subrecipient workers as the incorporation of DOE WAP curricula, certifications, and standards have been incorporated into HEP Certifications. WVDO feels the partnership between DOE/WAP and NREL/BPI is a great step toward standardization and high quality service delivery in the Weatherization and Energy Efficiency industries.

Due to funding and time constraints, WVDO understands that it will not be possible to get all subrecipient staff HEP-certified for each position in this Program Year. However, as outlined above, WV WAP will incorporate the EA into WV WAP requirements and will add additional HEP certifications in subsequent years. In order to be certified at a particular position in the WV WAP, the person must attend the IREC accredited certification training and be able to pass the written test and field test as applicable.

The following are the current defined WV WAP certifications:

1. HEP EA Certification
2. HEP QCI Certification
3. Energy (Client) Educator Certification
4. Environmental Protection Agency (EPA) Accredited Lead Renovator Certification (and Recertification as applicable)
5. HVAC Technician Certification

The following certifications are under consideration as requirements in the future for the respective weatherization staff positions in addition to the certifications listed above:

1. HEP Retrofit Installer Technician Certification
2. HEP Crew Leader Certification

In addition to the HEP-level certifications and other required certifications, the WV WAP will periodically coordinate licensing testing through the West Virginia Fire Marshal's Office, the West Virginia Contractors Licensing Board, as well as EPA certification testing venues for the following:

1. West Virginia HVAC Electrician License
2. West Virginia Single Family Dwelling Electrician License
3. West Virginia Journeyman's Electrician License
4. West Virginia Apprentice Electrician License
5. EPA Section 608 Refrigerant Transition Technician Certification
6. HVAC Technician License
7. HVAC Technician in Training License



All weatherization programs must also have a West Virginia Residential Contractors License at the subrecipient level, obtained through the West Virginia Contractors Licensing Board. Special projects are constantly being undertaken to ensure that the WV WAP keeps up with state-of-the-art energy conservation and management techniques. The following are additional Tier 2 trainings that will be offered throughout the year as needed, several having already been discussed earlier as priorities for PY 2018 – 2019, especially with regards to the implementation of the *WV WAP Health and Safety Plan*:

1. ASHRAE 62.2 -2016
2. Combustion Appliance Zone (CAZ) Training
3. Lead Safe Work Practices Training
4. OSHA Confined Spaces in Construction Standard Course
5. Healthy Homes
6. Weatherization Assistant Training
7. Duct Blaster
8. Infrared Camera Training
9. Database Management Training
10. Utility Program Training
11. Administrative/Programmatic/Financial Training
12. WV WAP Policy and Procedure Training

There are certain trainings (Tier 1 and 2) that are mandatory for compliance with rules and regulations in performance of the WAP. Currently, each subrecipient must have a certified QCI inspect all completed units, either in-house or through working with another subrecipient. As DOE mandates, additional certifications, trainings will be made available to the subrecipients for compliance.

If a subrecipient does not have such due to losing an employee or another circumstance, then attending one (1) of those trainings would be mandatory or the functions must be contracted out to a subrecipient with certified staff. There is also a requirement that each subrecipient has a certified EPA Lead Renovator on staff as well as staff who have attended periodic mandatory trainings regarding new requirements with health and safety related measures (ASHRAE/CAZ, etc.) and have electrician's licenses to perform those functions. As noted earlier, after September 30, 2016, it is required that HVAC work not be performed by subrecipient staff who do not have the proper West Virginia HVAC Technician or Technician in Training certification.

Non-compliance with regards to any mandatory training without the written approval from WVDO due to extenuating circumstances could result in a subrecipient not able to perform certain functions with their staff until the requirements are met.

### **Technical Assistance**

The WV WAP will continue to utilize the traditional approaches of on-site program, administrative, fiscal, and in-field technical assistance based on monitoring findings and/or

needs of particular subrecipients. T&TA activities are intended to maintain or increase the efficiency, quality and effectiveness of the WAP at all levels. Activities will be designed to maximize energy savings, minimize production costs, improve program management and crew/contractor “quality of work,” and/or reduce the potential for waste, fraud, abuse and mismanagement.

Technical assistance will continue at this time to be provided by WV WAP Specialists. The WV WAP Specialists also perform subrecipient monitoring, so their familiarity with each subrecipient’s operation enables focused attention to specific technical assistance needs of particular subrecipients. The combination of monitoring report findings, discussions at staff meetings, peer exchanges, subrecipient feedback, and research of state-of-the-art energy conservation techniques all help to determine the focus of the technical assistance.

### **Energy Savings:**

As mentioned in the *State Plan Annual File*, during PY 2015 – 2016, WVDO developed and implemented a system to estimate annual energy savings for all funding sources as per 440.14(c)(4). The process entails utilizing data from the “Weatherization Assistant Recommended Measures Output Report.” Data has been collected, and WVDO can compare the productivity and associated energy savings data from the individual subrecipients and has the capability to analyze by measure. In PY 2017 – 2018, the WV WAP collected a full program year of data and, in PY 2018 – 2019, WVDO will continue to pursue any additional development needed of the database management tool reporting capabilities to be able to utilize the data effectively in the future. This data can contribute to identifying areas of training or technical assistance needed for the work being performed in the field.

### **Pass-through entity Assessment:**

Training needs have been identified and are continuously evaluated. The new Field Monitor will need to complete was hired and will attend trainings and conferences at regional and national levels commensurate to the job duties. Current WV WAP staff have likewise received ongoing relevant training.

In addition to training new hires, another top priority is to attend trainings to keep in compliance with any new DOE regulations or guidance and to assist subrecipients to do the same. After that is met, then trainings are scheduled by the greatest need, i.e., the number of subrecipients that need a particular training. At the same time, WVDO will evaluate how many HEP certifications have been obtained to be in compliance, and how many more could be obtained with available funding. WVDO assesses periodically both the needs of the subrecipients as well as funds that are available to meet those needs and will plan accordingly. WVDO also makes assessments at the end of a grant cycle (DOE or LIHEAP), evaluating the amounts budgeted for training during the previous grant cycle relative to what was provided, and comparing to anticipated training needs and funding available for the new grant cycle.

## **V.9 Energy Crisis and Disaster Response Plan**

### **V.9.1 Energy Crisis**

The WV WAP utilizes LIHEAP WAP funds to operate the Energy Crisis Intervention Program (ECIP). The intent of ECIP is to provide emergency heat during the winter heating season. The program addresses non-operable or severely malfunctioning and unsafe heating systems. Any household that is eligible for WAP is eligible for ECIP services. Any household that receives the emergency heating system repairs or replacements from ECIP must apply for regular WAP services. ECIP provides emergency assistance within 72 hours to ensure the household will have heat. Weatherization services will be provided by the end of the program year, unless conditions exist that deems the dwelling ineligible for weatherization services at that time. During the LIHEAP Weatherization Application and Award process, the subrecipients are provided updated ECIP guidance.

### **V.9.2 Disaster Response Plan**

The WV WAP Disaster Response Plan is addressed in *Section V.1.2 Approach to Determining Building Eligibility (#7)* and is in accordance with DOE WPN 12-7 *Disaster Planning and Relief* and all applicable Federal regulations.



# West Virginia Weatherization Assistance Program

State of West Virginia  
Development Office

**PART II - ANNUAL FILE**  
**PY 2018 - 2019**



**State of West Virginia  
Development Office**

**U.S. Department of Energy  
Program Year: 2018 - 2019  
State Plan Annual File**

**IV.1 SUBRECIPIENTS**

Subrecipients are listed with the following information provided for each:

- Name
- Organization type
- DUNS number
- Contact information including e-mail address
- Phone and Fax numbers
- Address including County and Congressional District
- Tentative dollar amount
- Tentative units
- County served
- Congressional District served

**IV.2 SELECTION of SUBGRANTEES**

Per 42 U.S.C. § 6864(b)(4) and 10 CHR 440.15, the West Virginia Weatherization Assistance Program (WV WAP) conducts a public hearing during the State Plan process. The public, Community Action Agencies, or other public or nonprofit entities can attend and state their interest in becoming a WV WAP provider. WVDO subrecipients are selected on the basis of public comment which is received during the public hearing. Also considered is the potential applicants' and/or current subrecipient's experience in assisting low-income persons, not only through weatherization, but through all low-income assistance programs offered throughout their service areas. WV WAP applicants/subrecipients must also demonstrate the capacity to operate a timely and effective weatherization program. Preference is given to Community Action Agencies that are currently administering an effective weatherization program under Title II of the Economic Opportunity Act of 1964. WV WAP has chosen its subrecipients from qualifying Community Action Agencies throughout the state. WV WAP considers the subrecipient's experience and performance in weatherization or housing renovation activities.

## **IV.2 WAP PRODUCTION SCHEDULE:**

<b>Average Unit Costs, including Reweatherization – Subject to DOE Program Rules</b>	
VEHICLE & EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)	
A. Total Vehicles & Equipment (\$5,000 or more) Budget	\$0
B. Total Units Weatherized	383
C. Total Units Reweatherized	0
D Total Dwelling Units to be Weatherized and Reweatherized (B+C)	383
E. Average Vehicles & Equipment Acquisition Cost per Unit (A divided by D)	\$0
AVERAGE COST PER DWELLING UNIT (DOE RULES)	
F. Total Funds for Program Operations	\$2,400,401
G. Total Dwelling Units to be Weatherized and Reweatherized (from line D)	383
H. Average Program Operations Costs per Unit (F divided by G)	\$6,267.37
I. Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$0
J. Total Average Cost per Dwelling (H plus I)	\$6,267.37

Total Units (excluding re-weatherized): **383**

Reweatherized Units: **0**

## **IV.3 ENERGY SAVINGS**

The West Virginia Weatherization Assistance Program (WV WAP) will utilize the WAP algorithm to calculate projected energy savings for the purpose of this application. The estimated energy savings for PY 2018-2019 is 12,980 MBtu.

The West Virginia Office of Economic Opportunity (WVOEO) (now West Virginia Development Office) developed and implemented a system to estimate annual energy savings for all funding sources as per 440.14(c)(4). The process entails utilizing data from the “Weatherization Assistant Recommended Measures Output Report.” In PY 2017 – 2018, the WV WAP was able to collect data to compare/report energy savings data. WVDO will continue to pursue any additional development needed of the database management tool reporting capabilities to utilize the data effectively.

<b>Energy Savings</b>		
<b>DOE Program</b>	<b>Amount</b>	<b>Line</b>
Total DOE State Weatherization Allocation	\$3,493,809	(a)
Total Cost associated with Administration, T&TA, Financial Audits, and Insurance <b>AND H&amp;S (Separate Line)</b>	\$1,093,408	(b)
Subtract the amount entered in line (b) from line (a), for a total Federal (DOE) funds available to weatherize homes	\$2,400,401	(c)
State Average Cost per Home	\$6,267	(d)
Divide the amount entered on line (c) by the amount entered on line (d), for Total Estimated Homes to be Weatherized	383	(e)
Multiply (e) by 29.3 MBTU for Total Annual Estimated Energy Savings resulting from DOE appropriated funds	11,222	(f)

The PY 2018 – 2019 energy saving calculations uses the most recent Metaevaluation of the National Weatherization Assistance Program (ORNL/CON-493).

**IV.4 DOE-Funded Leveraging Activities:**

WV WAP will continue to pursue non-Federal resources to supplement the Program through the development or continuation of leveraging projects and partnerships. The WV WAP expects at least a dollar return for every dollar invested in leveraging project activity. Weatherization leveraging activities in WV WAP since 2002 have consistently and successfully produced a greater number of dollars leveraged than expended every year on leveraging activities.

WVDO will have a staff member that will continue to participate in leveraging activities. For PY 2018 – 2019, WVDO plans to utilize **0.0286 percent (\$1,000)** of the annual formula DOE allocation for leveraging activities.

Planned activities may include the following objectives as needed to increase the scope of weatherization services to low-income West Virginia households:

- Continued facilitation in the development of utility/WAP projects and partnerships, including supporting representation activities in the West Virginia Public Service Commission if needed for new partnerships. WVDO staff will continue to be involved in technical assistance, planning, and rules development of any negotiated projects or partnerships. Expansion or altering of certain weatherization-utility partnership activity may be negotiated between the utility companies and the local weatherization providers, with WVDO made fully aware of any changes made in this manner, providing input as needed.
  
- Continued facilitation of the expansion of potential subrecipient leveraging activities by:
  - Assisting subrecipients and West Virginia Community Action Partnership (WVCAP) through the negotiation of partnerships, agreements, and other arrangements;
  - Presentation of arguments and associated activities before state or local agencies, as contained under Section 142 of the Energy Policy Act of 1992 (amended in 2005) and providing training and technical assistance support to WVCAP and subrecipients as part of their active participation in utility rate proceedings and process in West Virginia as applicable; and
  - Continued contact with both the utility industry and the private energy service company network to continuously improve programs.
  
- Continue to provide support and leadership to subrecipients and WVCAP offering tools and resources to assist in weatherization outreach, possibly including fall Energy Awareness activities. Such potential activities may involve:
  - Support in holding leveraging-related meetings;
  - Preparation of statewide weatherization statistical documents;
  - Preparation of public information/energy efficiency data; and
  - Technical assistance in the organization of weatherization site demonstrations at the local subrecipient level to illustrate program technology for policymakers and other partners.

It is anticipated that continued leveraging activities will enable the WV WAP to enhance and expand comprehensive low-income weatherization services and be viewed as a leader in energy conservation technology and a viable partner in conservation projects.

Listed below are the identified funding sources outside of DOE funding for the WV WAP at this time. However, it is a goal of the WV WAP to continue to pursue funding to support and build upon the weatherization program in the State of West Virginia. This pursuit may include but not be limited to grants, foundation funds, and other non-federal partnerships.

**Current non-DOE Funding Supporting WV WAP**



**Low-Income Home Energy Assistance Program (LIHEAP):** The WV WAP will continue to utilize Low-Income Home Energy Assistance Program (LIHEAP) funds in the operation of the weatherization program. WVDO has worked with the West Virginia Department of Health and Human Resources (DHHR), the LIHEAP Grantee, to identify allowable measures and costs that could be supported by LIHEAP funding outside of DOE regulations and requirements. As per LIHEAP IM 1999-11, Weatherization Grantees “may use some, all or none of the statutory and regulatory provisions that apply to the Department of Energy's Low-Income Weatherization Assistance Program when spending LIHEAP funds on weatherization activities, provided the grantee administers both programs.” Therefore, WVDO works with DHHR to construct the LIHEAP agreement to provide more flexibility within the program and the ability to address issues that may not be able to be addressed with DOE funding due to certain restrictions.

Currently, the most notable exceptions of LIHEAP funding are the three (3) Supplemental Components: Electrical Upgrade, Weatherization Related Home Repair, and the Energy Crisis Intervention Program (ECIP) which historically have been approved measures of the Grant Agreement WVDO has with DHHR. DHHR has also approved additional funds for Health and Safety measures through LIHEAP funding. The WVDO monitors subrecipient Health and Safety spending monthly to keep the WV WAP Network from spending excessive funding on Health and Safety related issues.

The WV WAP is again seeking additional LIHEAP funding through DHHR for weatherization services. The WV WAP is proposing that these funds not include all DOE rules and regulations in order to address client issues that are outside the scope of DOE funds. This includes additional Home Repair flexibility in attempts to reduce the deferral rate of the WV WAP by being able to address larger scale repair issues of dwellings to make them eligible to receive weatherization services. Working with DHHR, the WVDO will continue to be diligent to include proper standards for these funds to ensure appropriate quality for measure installation.

### **Utility Programs**

Through participation of rate-case energy advocacy intervention activity at the Public Service Commission of West Virginia, the WVCAP worked and advocated for utility-weatherization leveraging partnership initiatives administered by WVDO. These have been continuing partnerships that have not required additional rate case intervention. The current partnerships are as follows:

**Dominion Hope Gas:** The Dominion Hope Targeted Gas Energy Efficiency Program (TGEEP) is also managed in conjunction with the WAP. The intent of the program is to improve the overall efficiency and safety of the heating system by repair or replacement, thereby reducing the energy consumption of the customers served. Currently no other measures are approved as part of the program. The program typically receives \$100,000 per year from the utility company.

**AEP dba Appalachian Power Company and Wheeling Power Company (APCO):** The APCO low income weatherization program is a comprehensive utility funded residential energy efficiency

program that encompasses all the major areas of the DOE WAP (insulation, air sealing, HVAC, baseload reduction, and limited health and safety measures). The program typically provides approximately \$500,000 per year, but the program will most likely receive a significant increase for calendar year 2018 with an allocation just under \$900,000. This program, as well as the other non-WAP energy efficiency programs Appalachian Power Co. operates in WV, is evaluated yearly by a third-party contracted by the utility company.

**FirstEnergy Corporation dba Mon Power Company and Potomac Edison Company:** As of February 25, 2011, Allegheny Energy and its subsidiaries, merged and became part of the FirstEnergy family of companies headquartered in Akron, Ohio. In West Virginia, FirstEnergy will continue to utilize Potomac Edison Company for the service area in the eastern panhandle, and the Mon Power Company in the north-central service area of the state. The former Allegheny Power programs are now FirstEnergy programs.

- **FirstEnergy EEP:** First Energy Electric Efficiency Partnership: The FirstEnergy Electric Efficiency Partnership is a very basic utility program that was started over 10 years ago in WV. The program focuses on measures that will impact the consumption of electricity in the homes of WAP clients that are electric customers of First Energy Corporation in West Virginia. The program reimburses for costs of electric heating systems up to \$500, 50% of costs of electric water heaters, 50% of air sealing and insulation costs, and 100% of cost of various baseload measures. Typically, this partnership receives \$100,000 per year.
- **TrAILCo EEP+:** The Trans-Allegheny Interstate Line Company (TrAILCo) Electric Efficiency Partnership provide funds to the two West Virginia WAP Community Action Agency (CAA) subrecipients serving FirstEnergy customers in the six-county area through which the TRAILCo corridor passes. The program operates to supplement the DOE WAP funds to provide customers a more comprehensive and aggressive focus on baseload energy usage and energy efficiency measures than is defined and permitted by the DOE WAP. The TrAILCo program further invests in long range lowering of utility costs by allowing the installation of Energy Star appliances such as washing machines, air conditioners, water heaters and other appliances that have the potential to reduce energy costs for the household. The program also allows the replacement of high cost, low-efficiency heating systems with high-efficiency systems including Energy Star heat pumps. The TrAILCo program also allows for the installation of standard weatherization measures to better serve a greater number of clients more effectively and efficiently and stretch the federal weatherization dollars further. This program's original budget was \$500,000 per year for 5 years, split between the two CAAs. The program is no longer receiving funds from FirstEnergy, but is still in operation due to carry-over funds from previous years.
- **LICUAP:** FirstEnergy Corporation has also developed and approved a Low-Income Check-Up Audit Program (LICUAP) allowing the WAP subrecipients to perform "walk-thru" audits for low-income customers and address some basic baseload needs, as a complement to the WAP (CFLs, power strips, LED nightlight, showerhead/faucet aerator, pipe wrap, furnace whistle, refrigerators, freezers, window air conditioners) in addition

to energy education. This program was implemented in May 2012 and continues today. This program differs from the others as the funds are not administered by WVDO; it is a contract between the utility company, its contracted entities, and the CAAs. WVDO plays a supporting and technical assistance role in the partnership. The first five years of the program had a budget of almost \$2,758,919. The approval for future years is pending but is anticipated to be similar or increased. This program is also evaluated by a third-party contractor of the utility company.

**IV.5 Policy Advisory Council:**

The Policy Advisory Council (PAC) historically meets at least once a year with periodic updates sent to members if major changes occur. A PAC meeting is scheduled during the WV WAP State Plan process to solicit input from the PAC Committee on the development of the program for PY 2018 – 2019.

Policy Advisory Council Members:

<b>NAME</b>	<b>ORGANIZATION</b>	<b>CONTACT INFORMATION</b>	<b>REPRESENTING</b>
Steve Gilman	PRIDE Community Services Inc.	<a href="mailto:steve.gilman@loganpride.com">steve.gilman@loganpride.com</a>	WV WAP Network
Ann McDaniel	WV Statewide Independent Living Council	<a href="mailto:ann.meadows@wvsilc.org">ann.meadows@wvsilc.org</a>	Disabled West Virginians
Gaylene Miller	Senior State Director, AARP	<a href="mailto:gmillier@aarp.org">gmiller@aarp.org</a>	Elderly
Mary Chipps	Executive Director, WV Community Action Partnership	<a href="mailto:mchipps@suddenlinkmail.com">mchipps@suddenlinkmail.com</a>	Community Action Agencies
Jacqueline Roberts	Public Service Commission; Consumer Advocate Division	<a href="mailto:jroberts@cad.state.wv.us">jroberts@cad.state.wv.us</a>	Consumers in West Virginia
Tammy Stafford	EE & Consumer Programs Manager, Appalachian Power	<a href="mailto:tcstafford@aep.com">tcstafford@aep.com</a>	Utility Sector

The WVDO was able to fill the Utility Sector vacancy in PY 2017 – 2018. The WV WAP PAC has excellent representation in areas relevant to eligible applicants, energy efficiency/leveraging activities, and subgrantee execution of weatherization services. WVDO and the PAC are always open and considering if the addition of further representatives would be beneficial to the PAC.

The PAC works to advise state weatherization staff on issues, challenges, and future direction of the program. The council is composed of members of associations and organizations serving the citizens of West Virginia. PAC members, by their leadership roles in the larger community, bring added value from an outside perspective to the program. The committee can also be an advocate for the general public about the Weatherization Assistance Program, low-income

energy needs, and energy efficiency. The PAC will advise WV WAP staff on policy based on their knowledge, perspective, and sensitivity to their particular constituency.

During the PAC meeting on March 15, 2018, members had a chance to provide input for the PY 2018 – 2019 State Plan as well as discuss challenges of the upcoming year. The Agenda, Sign-In Sheet, and Meeting Notes are submitted as an attachment to this plan.

#### **IV.6 State Plan Hearings:**

An announcement of the Public Hearing was posted for three (3) consecutive days, at least ten (10) days prior to the Public Hearing in eight (8) major newspapers throughout the state. The Public Hearing was announced April 5, 2018, and WVDO held the Public Hearing on April 23, 2018. The following newspapers advertised the hearing:

- Bluefield Daily Telegraph
- Charleston Newspapers
- Dominion Post (Morgantown)
- The Herald Dispatch (Huntington)
- Parkersburg News and Sentinel
- Register-Herald (Beckley)
- The Journal (Martinsburg)
- Wheeling Newspaper, Inc.

The “Public Hearing Notice” that appeared in the newspapers is included as an attachment. WVDO also attached evidence that each newspaper published the announcement as back-up documentation.

A court reporter was retained to provide a transcript of the Public Hearing and WVDO will provide the written transcript upon receipt.

#### **IV.7 Miscellaneous:**

##### **“Recipient Business Officer”**

*Name:* Russell Tarry – Deputy Director, Community Advancement and Development

*Email:* [Russell.W.Tarry@wv.gov](mailto:Russell.W.Tarry@wv.gov)

*Phone:* 304 – 558 – 2234 ext. 52061

##### **“Recipient Principal Investigator”**

*Name:* Mark Adams – Weatherization Manger

*Email:* [Mark.A.Adams@wv.gov](mailto:Mark.A.Adams@wv.gov)

*Phone:* 304 – 558 – 2234 ext. 52007

DOE F 540.5  
(08/05)

U.S. Department of Energy

OMB Control No: 1910-5127

**WEATHERIZATION ASSISTANCE PROGRAM  
SUBGRANTEE INFORMATION**

Expiration Date: 02/29/2020

State: WV Grant Number: EE0007958 Program Year: 2018

<p>Name: <b>CHANGE, Incorporated</b></p> <p>Address: 3136 West Street Weirton, WV 26062-4637</p> <p>Counties served: HANCOCK County BROOKE County OHIO County MARSHALL County</p>	<p>Tentative allocation: \$ 177,125.00 Planned units: 22 Type of organization: Local agency Source of labor: Agency and Contractors</p>	<p>Contact: David Ruhl, Weatherization Coordinator DUNS: 131200057 Phone: (304) 797-7733 Fax: (304) 797-7740 Email: davidruhl@changeinc.org</p>	<p>Congressional districts served: <u>CD</u> WV-01</p>
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<p>Name: <b>Coalfield CAP</b></p> <p>Address: P.O. Box 1406 Williamson, WV 25661-3215</p> <p>Counties served: MINGO County KANAWHA County CLAY County BOONE County</p>	<p>Tentative allocation: \$ 361,937.00 Planned units: 45 Type of organization: Local agency Source of labor: Agency</p>	<p>Contact: Jason Johnson, Weatherization Coordinator DUNS: 003845596 Phone: (304) 235-1701 Fax: (304) 235-1706 Email: jjohnson@coalfieldcap.org</p>	<p>Congressional districts served: <u>CD</u> WV-03 WV-02</p>
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<p>Name: <b>Community Action of South Eastern West Virginia</b></p> <p>Address: 355 Bluefield Avenue Bluefield, WV 24701-3044</p> <p>Counties served: MERCER County MONROE County RALEIGH County SUMMERS County</p>	<p>Tentative allocation: \$ 300,128.00 Planned units: 37 Type of organization: Local agency Source of labor: Agency and Contractors</p>	<p>Contact: Kimberly Bourne, Weatherization Coordinator DUNS: 627389364 Phone: (304) 324-0450 Fax: (304) 372-8822 Email: kbourne@casewv.org</p>	<p>Congressional districts served: <u>CD</u> WV-03</p>
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<p>Name: <b>Community Resources, Incorporated</b></p> <p>Address: 1037 Market Street Parkersburg, WV 26101-0000</p>	<p>Contact: Vicki Randolph, Weatherization Director DUNS: 784204240 Phone: (304) 485-9238 Fax: (304) 485-5526 Email: vrandolph@cricap.org</p>
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DOE F 540.5  
(08/05)

U.S. Department of Energy

OMB Control No: 1910-5127

**WEATHERIZATION ASSISTANCE PROGRAM  
SUBGRANTEE INFORMATION**

Expiration Date: 02/29/2020

State: WV Grant Number: EE0007958 Program Year: 2018

Counties served: CALHOUN County RITCHIE County WOOD County WIRT County WETZEL County PLEASANTS County JACKSON County DODDRIDGE County GILMER County TYLER County ROANE County	Tentative allocation: \$ 385,308.00 Planned units: 48 Type of organization: Local agency	Congressional districts served:	<u>CD</u> WV-01 WV-02
Source of labor: Agency			

Name: <b>Eastern West Virginia Community Action Agency</b>  Address: 228 Clay Street Moorefield, WV 26836	Contact: Joe Adkins, Weatherization Coordinator DUNS: 804530087  Phone: (304) 538-7711 Fax: (304) 538-7478 Email: jdadkins@ewvcaa.org	Counties served: GRANT County MINERAL County PENDLETON County BERKELEY County HARDY County JEFFERSON County MORGAN County HAMPSHIRE County	Tentative allocation: \$ 317,963.00 Planned units: 40 Type of organization: Local agency	Congressional districts served:	<u>CD</u> WV-01 WV-02
Source of labor: Agency and Contractors					

Name: <b>Mountain CAP of West Virginia, Incorporated</b>  Address: 26 North Kanawha Street Buckhannon, WV 26201-2714	Contact: Lance Cragle, Weatherization Coordinator DUNS: 014529630  Phone: (304) 472-1500 Fax: (304) 472-9064 Email: lcragle@mountaincap.com	Counties served: LEWIS County WEBSTER County BRAXTON County UPSHUR County	Tentative allocation: \$ 148,834.00 Planned units: 19 Type of organization: Local agency	Congressional districts served:	<u>CD</u> WV-02 WV-03
Source of labor: Agency					

Name: <b>MountainHeart Community Services</b>  Address: P.O. Box 1509 Oceana, WV 24870-1519	Contact: Gerald Brown, Weatherization Coordinator DUNS: 155399363  Phone: (304) 682-8271 Fax: (304) 682-8274 Email: gbrown@mountainheartwv.org
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DOE F 540.5  
(08/05)

U.S. Department of Energy

OMB Control No: 1910-5127

**WEATHERIZATION ASSISTANCE PROGRAM  
SUBGRANTEE INFORMATION**

Expiration Date: 02/29/2020

State: WV Grant Number: EE0007958 Program Year: 2018

Counties served:	WYOMING County FAYETTE County	Tentative allocation: \$ 133,458.00 Planned units: 17 Type of organization: Local agency Source of labor: Agency	Congressional districts served:	<u>CD</u> WV-03
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Name:	<b>Nicholas Community Action Partnership</b>	Contact:	Cindy Foster, Weatherization Coordinator
		DUNS:	169582368
Address:	1205 Broad Street Summersville, WV 26651-1205	Phone:	(304) 872-1162
		Fax:	(304) 872-5796
		Email:	cfoster@ncapwv.org

Counties served:	NICHOLAS County	Tentative allocation: \$ 52,276.00 Planned units: 6 Type of organization: Local agency Source of labor: Agency and Contractors	Congressional districts served:	<u>CD</u> WV-03
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Name:	<b>North Central West Virginia Community Action Assoc., Inc.</b>	Contact:	Brian Hollen, Weatherization Coordinator
		DUNS:	108900317
Address:	1304 Goose Run Road Fairmont, WV 26554-1345	Phone:	(304) 457-3420
		Fax:	(304) 457-1367
		Email:	bhollen@ncwvcaa.org

Counties served:	PRESTON County HARRISON County TAYLOR County MONONGALIA County POCAHONTAS County MARION County TUCKER County GREENBRIER County RANDOLPH County BARBOUR County	Tentative allocation: \$ 665,755.00 Planned units: 83 Type of organization: Non-profit organization Source of labor: Agency	Congressional districts served:	<u>CD</u> WV-01 WV-03 WV-02
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Name:	<b>PRIDE Community Services</b>	Contact:	Steve Gilman, Weatherization Coordinator
		DUNS:	085529840
Address:	PO Box 1346 Logan, WV 25601-0000	Phone:	(304) 752-6868
		Fax:	(304) 752-1047
		Email:	steve.gilman@loganpride.com

Counties served:	LOGAN County MCDOWELL County	Tentative allocation: \$ 136,226.00 Planned units: 17 Type of organization: Local agency Source of labor: Agency	Congressional districts served:	<u>CD</u> WV-03
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DOE F 540.5  
(08/05)

U.S. Department of Energy

OMB Control No: 1910-5127

**WEATHERIZATION ASSISTANCE PROGRAM  
SUBGRANTEE INFORMATION**

Expiration Date: 02/29/2020

State: WV Grant Number: EE0007958 Program Year: 2018

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Name:	<b>Southwestern Community Action Council</b>	Contact:	Connie Sherrill-Drake, Weatherization Coordinator
		DUNS:	063472088
Address:	540 Fifth Avenue Huntington, WV 25701-1908	Phone:	(304) 525-5151
		Fax:	(304) 525-5162
		Email:	connie.sherrill-drake@scacwv.org
Counties served:	MASON County LINCOLN County WAYNE County CABELL County PUTNAM County	Tentative allocation:	\$ 396,070.00
		Planned units:	49
		Type of organization:	Local agency
		Congressional districts served:	<u>CD</u> WV-03 WV-02
		Source of labor:	Agency and Contractors

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# West Virginia Weatherization Assistance Program

State of West Virginia  
Development Office

A large, solid green outline map of the state of West Virginia, centered on the page. The map is outlined in yellow.

**PART III - BUDGET**  
**PY 2018 - 2019**



**BUDGET INFORMATION - Non-Construction Programs**

1. Program/Project Identification No. EE0007958		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address West Virginia Development Office 1900 Kanawha Blvd., East Charleston, WV 253050000		4. Program/Project Start Date 07/01/2018	5. Completion Date 06/30/2019

**SECTION A - BUDGET SUMMARY**

Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. PY2018-19 DOE Annual Grant	81.042	\$ 0.00		\$ 3,493,809.00		\$ 3,493,809.00
2.						
3.						
4.						
5. TOTAL		\$ 0.00	\$ 0.00	\$ 3,493,809.00	\$ 0.00	\$ 3,493,809.00

**SECTION B - BUDGET CATEGORIES**

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) GRANTEE ADMINISTR ATION	(2) SUBGRANTE E ADMINISTR	(3) GRANTEE T&TA	(4) PROGRAM OPERATION S	
a. Personnel	\$ 67,868.00	\$ 0.00	\$ 88,367.00	\$ 0.00	\$ 156,949.00
b. Fringe Benefits	\$ 27,147.00	\$ 0.00	\$ 35,347.00	\$ 0.00	\$ 62,780.00
c. Travel	\$ 8,000.00	\$ 0.00	\$ 23,000.00	\$ 0.00	\$ 31,000.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 2,000.00	\$ 0.00	\$ 2,000.00	\$ 0.00	\$ 4,000.00
f. Contract	\$ 0.00	\$ 222,365.00	\$ 117,000.00	\$ 2,400,401.00	\$ 3,192,080.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 22,000.00	\$ 0.00	\$ 25,000.00	\$ 0.00	\$ 47,000.00
i. Total Direct Charges	\$ 127,015.00	\$ 222,365.00	\$ 290,714.00	\$ 2,400,401.00	\$ 3,493,809.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
k. Totals	\$ 127,015.00	\$ 222,365.00	\$ 290,714.00	\$ 2,400,401.00	\$ 3,493,809.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

**BUDGET INFORMATION - Non-Construction Programs**

1. Program/Project Identification No. EE0007958		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address West Virginia Development Office 1900 Kanawha Blvd., East Charleston, WV 253050000		4. Program/Project Start Date 07/01/2018	5. Completion Date 06/30/2019

SECTION A - BUDGET SUMMARY						
Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1.						
2.						
3.						
4.						
5. TOTAL		\$ 0.00	\$ 0.00	\$ 3,493,809.00	\$ 0.00	\$ 3,493,809.00

SECTION B - BUDGET CATEGORIES						
6. Object Class Categories	Grant Program, Function or Activity				Total (5)	
	(1) HEALTH AND SAFETY	(2) LIABILITY INSURANCE	(3) FINANCIAL AUDITS	(4) LEVERAGIN G		
a. Personnel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 714.00	\$ 156,949.00	
b. Fringe Benefits	\$ 0.00	\$ 0.00	\$ 0.00	\$ 286.00	\$ 62,780.00	
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 31,000.00	
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 4,000.00	
f. Contract	\$ 360,060.00	\$ 61,502.00	\$ 30,752.00	\$ 0.00	\$ 3,192,080.00	
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 47,000.00	
i. Total Direct Charges	\$ 360,060.00	\$ 61,502.00	\$ 30,752.00	\$ 1,000.00	\$ 3,493,809.00	
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	
k. Totals	\$ 360,060.00	\$ 61,502.00	\$ 30,752.00	\$ 1,000.00	\$ 3,493,809.00	
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	

**U.S. DEPARTMENT OF ENERGY**



**BUDGET JUSTIFICATION FOR FORMULA GRANTS**

Applicant: West Virginia Development Office  
Award number: EE0007958

Budget period: 07/01/2018 - 06/30/2019

**1. PERSONNEL** - Prime Applicant only (all other participant costs are listed in 6 below and form SF-242A, Section B.  
Line 6.f. Contracts and Sub-Grants).

Positions to be supported under the proposed award and brief description of the duties of professionals:

<u>Position</u>	<u>Description of Duties of Professionals</u>
WVDO Accountant II	Payment and tracking of agency funding request and other bills
WVDO Accounting Tech	Support for accounting staff
WVDO Accounting Auditor IV	Oversee fiscal operations at WVDO
Program Specialist/Field Monitor	Monitoring and T&TA
Program Specialist/Field Monitor	Monitoring and T&TA
Program Specialist/Field Monitor	Monitoring and T&TA
Weatherization Manager	Administer, manage, and coordinate WV Weatherization Assistance Program
Weatherization Assistant Administrator	Assist in management and administration of WAP, includes some monitoring
Weatherization Training Specialist	Manage/oversee training and technical assistance activities
Monitoring Coordinator/Compliance	Oversee all monitoring activities - Ensure compliance with Federal and State Regulations
WVDO Accountant II	Payment and tracking of agency funding request and other bills
Deputy Director	Manages utility partnerships
WVCAD Deputy Director - Wx	Assists with the oversight of the Community Advancement and Development Office
Sustainability Manager	Oversees Sustainability Division of the Community Advancement and Development Office

Direct Personnel Compensation:

<u>Position</u>	<u>Salary/Rate</u>	<u>Time</u>	<u>Direct Pay</u>
WVDO Accountant II	\$34,160.00	9.0000 % FT	\$3,074.40
WVDO Accounting Tech	\$39,933.00	5.0000 % FT	\$1,996.65
WVDO Accounting Auditor IV	\$62,106.00	7.5000 % FT	\$4,657.95
Program Specialist/Field Monitor	\$37,160.00	50.0000 % FT	\$18,580.00
Program Specialist/Field Monitor	\$42,160.00	50.0000 % FT	\$21,080.00
Program Specialist/Field Monitor	\$52,236.00	50.0000 % FT	\$26,118.00
Weatherization Manager	\$54,160.00	42.5000 % FT	\$23,018.00
Weatherization Assistant Administrator	\$47,556.00	47.5000 % FT	\$22,589.10
Weatherization Training Specialist	\$49,925.00	37.5000 % FT	\$18,721.88
Monitoring Coordinator/Compliance	\$51,660.00	5.0000 % FT	\$2,583.00
WVDO Accountant II	\$36,160.00	9.0000 % FT	\$3,254.40
Deputy Director	\$61,482.00	1.1619 % FT	\$714.36
WVCAD Deputy Director - Wx	\$61,482.00	2.5000 % FT	\$1,537.05
Sustainability Manager	\$66,848.00	13.5000 % FT	\$9,024.48
		<b>Direct Pay Total</b>	<b>\$156,949.27</b>

**2. FRINGE BENEFITS**

a. Are the fringe cost rates approved by a Federal Agency? If so, identify the agency and date of latest rate agreement or audit below, and attach a copy of the rate agreement to the application.

b. If a. above does not apply, please use this box (or an attachment) to further explain how your total fringe benefits costs were calculated. Your calculations should identify all rates used, along with the base they were applied to (and how the base was derived), and a total for each (along with grand total). If there is an established computation methodology approved for state-wide use, please provide a copy. Also, please fill out the table below with the Fringe Benefits Calculations.

The basis for computation of rates for fringe benefits of State employees includes federal and state regulations, personnel policies, and past experience. Fringe benefits to be paid from this grant include:

Social Security match - FICA @ 7.65% of the gross salary as per federal regulation

Workers compensation - calculated at .64% of gross salary

Unemployment compensation - calculated at 1.21% of gross salary

Health insurance - depends on salary, type of coverage (single or family), optional life, and choice of plan, as per personnel policies and state options - calculated at 16% of gross salary

State Retirement fund - calculated at 14.5% of gross salary

We are using 40% for budgeting purposes in this grant year, based on average fringe benefit costs from the previous grant year.

## Fringe Benefits Calculations

<b>Position</b>	<b>Direct Pay</b>	<b>Rate</b>	<b>Benefits</b>
WVDO Accountant II	\$3,074.40	40.0000 %	\$1,229.76
WVDO Accounting Tech	\$1,996.65	40.0000 %	\$798.66
WVDO Accounting Auditor IV	\$4,657.95	40.0000 %	\$1,863.18
Program Specialist/Field Monitor	\$18,580.00	40.0000 %	\$7,432.00
Program Specialist/Field Monitor	\$21,080.00	40.0000 %	\$8,432.00
Program Specialist/Field Monitor	\$26,118.00	40.0000 %	\$10,447.20
Weatherization Manager	\$23,018.00	40.0000 %	\$9,207.20
Weatherization Assistant Administrator	\$22,589.10	40.0000 %	\$9,035.64
Weatherization Training Specialist	\$18,721.88	40.0000 %	\$7,488.75
Monitoring Coordinator/Compliance	\$2,583.00	40.0000 %	\$1,033.20
WVDO Accountant II	\$3,254.40	40.0000 %	\$1,301.76
Deputy Director	\$714.36	40.0000 %	\$285.74
WVCAD Deputy Director - Wx	\$1,537.05	40.0000 %	\$614.82
Sustainability Manager	\$9,024.48	40.0000 %	\$3,609.79
		Fringe Benefits Total	\$62,779.70

**3. TRAVEL**

a. Please provide the purpose of travel, such as professional conference(s), DOE sponsored meeting(s), project management meeting, etc. If there is any foreign travel, please identify.

<b>Purpose of Trip</b>	<b>Number of Trips</b>	<b>Cost Per Trip</b>	<b>Total</b>
WVDO staff - DBA Monitoring Training Total Cost: \$656 DOE Cost: \$328 All T&TA	1	\$328.00	\$328.00
Return Field Monitoring Trips for Follow Up compliance Total Cost: \$3,996 DOE Cost 50% = \$1,998 (All TTA)	6	\$333.00	\$1,998.00
WVDO staff travel for Field/Technical Meetings \$3,996 x 50% (DOE cost) = \$1,998 (All TTA)	6	\$333.00	\$1,998.00
WAP Programmatic Monitoring Total Cost: \$12,992 DOE 50% = \$6,496 Admin: \$500 TTA: \$5,996	14	\$464.00	\$6,496.00

WAP Field Monitoring Total Cost: \$15,984 DOE cost 50% = \$7,982 ((\$307 per trip) All T&TA)	26	\$307.00	\$7,982.00
Fall & Mid-Winter NASCSP Conference Total Cost: \$18,672 DOE Total Cost: \$9,008 (Admin: \$5,910 TTA: \$3,426)	8	\$1,126.00	\$9,008.00
WAP Fiscal Monitoring Total Cost: \$3,000 All Admin DOE cost 33% = \$990	11	\$90.00	\$990.00
WVDO staff travel for Training for Certifications \$2,400 x 50% (DOE cost) = \$1,200 All TTA	4	\$300.00	\$1,200.00
WVDO staff travel for WV WAP Programmatic/Administrative Meeting \$2,000 x 50% (DOE cost) = \$1,000 (Admin: \$600 TTA: \$400)	2	\$500.00	\$1,000.00
		Travel Total	\$31,000.00

- b. Please provide the basis for estimating the costs, such as past trips, current quotations, Federal Travel Regulations, etc. All listed travel must be necessary for the performance of the award objectives.

Most travel estimates are based on State Travel Policy (per West Virginia Code §12-3-11 effective 7/1/2015 <http://www.state.wv.us/admin/purchase/travel/policy.html>) and past trips of a similar nature.

**4. EQUIPMENT** - Equipment is generally defined as an item with an acquisition cost greater than \$5,000 and a useful life expectancy of more than one year.

- a. List all proposed equipment below and briefly justify its need as it applies to the objectives of the award.

Equipment	Unit Cost	Number	Total Cost	Justification of Need
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- b. Please provide a basis of cost such as vendor quotes, catalog prices, prior invoices, etc. and justify need. If the Equipment is being proposed as Cost Share and was previously acquired, please provide the source and value of its contribution to the project and logical support for the estimated value shown. If it is new equipment which will retain a useful life upon completion of the project, provide logical support for the estimated value shown. Also, please indicate whether the Equipment is being used for other projects or is 100% dedicated to the DOE project.

**5. SUPPLIES** - Supplies are generally defined as an item with an acquisition cost of \$5,000 or less and a useful life expectancy of less than one year. Supplies are generally consumed during the project performance.

- a. List all proposed supplies below, the estimated cost, and briefly justify the need for the supplies as they apply to the objectives of the award. Note that all direct costs, including Supply items, may not be duplicative of supply costs included in the indirect pool that is the basis of the indirect rate applied for this project.

General Category	Cost	Justification of Need
Computer Purchases	\$1,500.00	Total cost \$3,000 DOE 50% DOE Cost: \$1,500
General Office Supplies, DOE Share	\$2,500.00	Office supplies for daily use in operating program-paper, ink, pens, clips, binders, tape, etc. Total 12 month cost: \$5,000 (DOE 50%) DOE Cost: \$2,500 Admin: \$500 TTA: \$2,000
Materials and Supplies Total	\$4,000.00	

- b. Please provide a basis of cost for each item listed above and justify need. Examples include vendor quotes, prior purchases of similar or like items, published price list, etc.

Costs are based on previous year's costs.

**6. CONTRACTS AND SUBGRANTS** - Provide the following information for New proposed subrecipients and subcontractors. For ongoing subcontractors and subrecipients, this information does not have to be restated here, if it is provided elsewhere in the application; under Name of Proposed Sub, indicate purpose of work and where additional information can be found (i.e. weatherization subgrants, Annual File section IV.1).

Name of Proposed Sub	Total Cost	Basis of Cost*
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Training Centers/Trainers Costs for Subrecipients - All TBD	\$92,000.00	All costs are estimates - All trainings will go through bidding process Total DOE cost: \$126,865. Additional cost picked up with other funding sources DOE Costs - ALL TTA: HVAC: \$9,650 BPI QCI: \$10,250 BPI EA: \$29,460 Lead Safe: \$2,999 New Hire/Basic WX: \$8,700 WV State Electrical licenses: \$2,450 ASHRAE: \$3,000 HEP Crew Leader: \$8,750 CEUs (HEP, Healthy Homes): \$16,741
DBA FACS Pro	\$25,000.00	WAP database management system Total WAP cost: \$54,000 DOE upgrade cost: \$5,000 TTA DOE System Maintenance Fee: \$20,000 TTA
WV WAP Subgrantees	\$3,075,080.00	To provide funds to twelve (12) Community Action Agencies to operate Weatherization Assistance Programs throughout fifty-five (55) counties in West Virginia.
Contracts and Subgrants Total	\$3,192,080.00	

\*For example, Competitive, Historical, Quote, Catalog

**7. OTHER DIRECT COSTS** - Other direct costs are direct cost items required for the project which do not fit clearly into other categories. These direct costs may not be duplicative of costs included in the indirect pool that is the basis of the indirect rate applied for this project. Examples are: conference fees, subscription costs, printing costs, etc.

a. Please provide a General Description, Cost and Justification of Need.

General Description	Cost	Justification of Need
Vehicle Fuel	\$4,000.00	WX Cost: \$8,000 DOE 50%: \$4,000 All TTA
Field Equipment Maintenance and Repair	\$1,000.00	Total WX cost: \$2,000 DOE 50%: \$1,000 All TTA
Computer Networking/OT	\$12,500.00	Computer Networking cost, IT costs, Website costs Total WX cost: \$25,000 Doe 50%: \$12,500 Admin: \$7,000 TTA: \$5,500
Miscellaneous Costs	\$4,000.00	Miscellaneous items such as bottled water for office water coolers, cell phone/tablet accessories, etc. Total: \$8,000 DOE (50%) Admin: \$2,000 TTA: \$2,000
NASCSP Yearly Membership Fees	\$2,632.00	Association Dues Total Cost: \$2,632 DOE Cost: \$2,632 All Admin
Advertising and Transcript for Public Hearing	\$950.00	Total cost: \$950 All Admin
Telecommunications	\$6,400.00	Desk phones, cell phones, and conference calls WX share: \$12,800 DOE 50% = \$6,400 Admin: \$2,400 TTA: \$4,000
Vehicle Maintenance/Repairs	\$2,000.00	WX share: \$4,000 DOE 50%: \$2,000 All TTA
WVDO Insurance	\$6,846.00	WX Share = \$13,692 DOE 50% = \$6,500 Admin: \$3,746 TTA: \$3,100
Associations and Professional Memberships	\$562.00	Total cost \$1,125 DOE 50% = \$562 All TTA Total WAP Cost: \$1,125 HVAC Contractor License: \$300 HVAC Electrical License: \$150 Single Family Electrical: \$150 EPA Section 608: \$525
Office Space	\$6,110.00	WX: \$12,220 (WVDO main office, Parkersburg office, Princeton office) DOE cost \$6,110 Admin: \$3,272 TTA: \$2,838
Other Direct Costs Total	\$47,000.00	

b. Please provide a basis of cost for each item listed above. Examples include vendor quotes, prior purchases of similar or like items, published price list, etc.

Rental and dues costs are based on agreements. Other costs are estimates based on prior similar expenditures or recent estimates

All costs included in Other Direct Costs are properly segregated from indirect costs to ensure there are not duplicate charges.

All costs proposed are only being used in support of the WAP program.

**8. INDIRECT COSTS**

- a. Are the indirect cost rates approved by a Federal agency? If so, identify the agency and date of latest rate agreement or audit and provide a copy of the rate agreement.
  
- b. If the above does not apply, indicate the basis for computation of rates, including the types of benefits to be provided, the rate(s) used, and the cost base for each rate. You may provide the information below or provide the calculations separately.

The name and phone number of the individual responsible for negotiating the State's indirect cost rates.

Name:

Phone Number:



**WEST VIRGINIA  
WEATHERIZATION ASSISTANCE PROGRAM**

**2018 – 2019 STATE PLAN**

**ATTACHMENTS**

## **ATTACHMENTS INDEX**

2018 WV WAP HEALTH & SAFETY PLAN

WV WAP QUALITY CONTROL INSPECTION FORM

WV CLIMATE ZONE MAP

WV WAP MATERIALS CHART

WV COMMUNITY ADVANCMENT & DEVELOPMENT OFFICE - ORGANAZATIONAL CHART

WV SECRETARY OF STATE PUBLIC HEARING CONFIRMATION

PY 2018-2019 WV WAP PUBLIC HEARING TRANSCRIPT

PY 2018-2019 WV WAP PUBLIC HEARING SIGN-IN SHEET

PY 2018-2019 WV WAP PUBLIC HEARING LEGAL ADVERTISEMENTS & NOTICE

WV WAP POLICY ADVISORY COUNCIL MEETING AGENDA

WV WAP POLICY ADVISORY COUNCIL MEETING SIGN-IN SHEET

WV WAP POLICY ADVISORY COUNCIL MEETING NOTES

WV DEVELOPMENT OFFICE COST ALLOCATION PLAN

WV WAP HISTORIC PRESERVATION AGREEMENT

WV WAP INTERGOVERNMENTAL REVIEW

WV DEVELOPMENT OFFICE SAM ENTITY ADMINISTRATOR LETTER

WV SINGLE AUDIT - 2017

## 2018 HEALTH & SAFETY PLAN

### 1.0 – GENERAL INFORMATION

The primary goal for the WV WAP is to implement cost-effective weatherization procedures to conserve energy and to assess and correct related health and safety hazards for the well-being of clients, their dwellings, and weatherization personnel.

With more advanced diagnostics and installation techniques utilized in the WV WAP, it is increasingly necessary to take steps to ensure that program measures do not cause or exacerbate health and safety problems for workers or clients.

Each home weatherized must be individually assessed to determine the existence of potential hazards to weatherization personnel or clients. When conditions within the home are such that the health and safety of the client, crew, or subcontractor will be jeopardized prior to providing assistance, weatherization must not proceed until such problems are remedied. In some cases, mitigation of problems may be beyond the scope of the Weatherization program. In these instances, the client must be notified in writing and referred to alternative resources for resolution of the problem.

In those instances where the existing conditions are perceived to pose a threat to the client, crew or contractor's health and safety, the WV WAP allows for deferral of weatherization work until the identified condition is made acceptable. The WV WAP Deferral Policy is described in *Section V.1.2 Approach to Determining Building Eligibility*.

### 2.0 – BUDGETING

The WV WAP will budget Health and Safety in a separate category and thereby exclude such costs from the average unit cost calculations. This separate category will also allow these costs to be isolated from energy efficiency costs in program evaluation.

### 3.0 – HEALTH AND SAFETY EXPENDITURE LIMITS

For the 2018 – 2019 Program Year, the West Virginia WAP would request to utilize up to **15 percent (15%)** of our 2018 – 2019 Program Operation funds for Health and Safety Expenditures. WV WAP uses its data management system to implement a limit on Health and Safety costs charged to DOE on a per job basis. Any Health and Safety costs over 15 percent (15%) will be charged to Low-Income Home Energy Assistance Program (LIHEAP) funding, as approved from the West Virginia Department of Health and Human Resources (DHHR), the LIHEAP Grantee.

Health and Safety costs are recorded in the data management system and tracked separately at the subrecipient level for accounting purposes, as well as in the Weatherization Assistant auditing software and reported as a separate line item on the WV WAP “Monthly Progress Report.” A list of materials that are allowable charges to Health and Safety has been developed and distributed. (See *WV WAP Materials Chart Attachment*). Subrecipients cannot add additional materials to this list. In this way, WVDO can monitor the Health and Safety costs on

each job. The Health and Safety costs reported on the WV WAP “Monthly Progress Report” are reviewed monthly and WVDO works with the subrecipients to bring them into or remain in compliance. WVDO also tracks the Health and Safety costs in the statistical analysis tool and other various spreadsheets as discussed in *Section V.6 Weatherization Analysis of Effectiveness*.

WVDO has worked with the utility companies and scopes of work have been adjusted so that the WV WAP can use certain utility funding to cover particular Health and Safety costs (specified in the Scopes of Work/Program Designs of the utility program), to lessen the burden on the DOE funds. At this time, not all utility partnerships allow for Health and Safety costs in their programs, but WVDO will continue to pursue this option in the future.

#### **4.0 – INCIDENTAL REPAIR MEASURES**

Incidental Repairs means those repairs necessary for the effective performance or preservation of weatherization materials. Such repairs include, but are not limited to, minor roof repair, framing or repairing 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. Incidental repairs must be justified in the client file with an explanation for their need and relationship to a specific energy conservation measure (ECM) and included in the Savings-to-Investment Ratio (SIR) of the group of ECMs. The WV WAP has developed a spreadsheet identifying allowable measures to be installed under Health and Safety and allowable measures to be installed as incidental repairs. (See *WV WAP Materials Chart Attachment*)

#### **5.0 – DEFERRAL/REFERRAL POLICY**

The WV WAP developed and implemented a *WV WAP Deferral Policy* on August 21, 2012, to assist in the decision to defer weatherization assistance on an eligible dwelling in attempt to standardize the procedure throughout West Virginia. As per the policy, a deferral does not mean that weatherization assistance will never be available, but that work must be postponed until the problems at the home can be resolved. Subrecipient crews and contractors are expected to pursue all reasonable options on behalf of the client, within program guidelines. After an on-site visit has been conducted, if conditions warrant and the subrecipient determines that the home meets one (1) or more of the following deferral conditions, a letter must be sent to the client outlining the conditions present at the dwelling and the justification for deferral. The reason for deferral must be selected and documented in the database management system and the database management system automatically generates the deferral letter with the proper justification to be submitted to the client.

Possible deferral conditions include but may not be limited to the following:

- a. Structurally unsound dwelling that is not suitable and adaptable to weatherization services, and the WAP does not have the resources to do necessary repairs;

- b. Electrical or plumbing hazards that cannot be resolved prior to or as part of weatherization services;
- c. The presence of raw sewage around or in any part of the dwelling;
- d. The presence of a dead animal, or animal feces, in an area where program staff must install weatherization measures;
- e. Excessive debris and clutter around the dwelling that limits access to the dwelling;
- f. Pets unchained or running loose that would be distracting or unsafe to program staff;
- g. The client is uncooperative, abusive, or threatening to the crew, or there is an apparent threat of violence or abuse to any program worker, or any household member, during the weatherization process;
- h. The presence or use of any controlled substance in the dwelling during the weatherization process;
- i. Environmental hazards, such as serious moisture problem, known excessive radon, friable asbestos, excessive lead paint, or other environmental hazards that cannot be resolved prior to or as part of the weatherization services;
- j. Evidence of substantial infestation of rodents, insects, bats, or other harmful/objectionable animals that are difficult to control;
- k. Major remodeling is in progress, limiting the proper installation of weatherization measures;
- l. Substantial standing water in or around the crawl space or basement area limiting the proper completion of weatherization measures;
- m. Dwelling resident has a medical condition that prohibits the installation of insulation and/or other weatherization measures;
- n. No cost-effective or appropriate health and safety measures can be done to the house resulting in minimal energy savings;
- o. Customer in arrears with utility vendor, gas service has been shut off, or electric service has been shut off;
- p. Client refusal of primary energy conservation measure ( $SIR \geq 2$ );
- q. Client refusal of health and safety measure(s) necessary for client safety;

- r. Income verification needed;
- s. Updated utility information needed; and
- t. Other conditions not listed above that prohibit complete weatherization.

There are several steps detailed in the WV WAP *Deferral Policy* outlining the subrecipient and/or client's responsibilities after the aforementioned deferral letter is generated in order to possibly complete weatherization for a client that was originally deferred. These steps involve allowing the client to correct the identified issues or barriers to weatherization and providing the subrecipient with documentation that issues have been addressed. There is also a procedure in place in the event that issues are not addressed or no response is received from the client. Once reasons for deferral are resolved, the application is re-activated within the data management system. Depending on the timing of the correction of deferral issues, eligibility criteria including income verification and prioritization status may need refreshed. The WV WAP Deferral Policy outlines the timing parameters in more detail. All applicable steps must be followed and all required documentation retained.

## **6.0 – HAZARD IDENTIFICATION AND NOTIFICATION FORM(S)**

Forms for Hazard Identification and notification can be found on the WVCAD website here;

[HTTP://WVCAD.ORG/SUSTAINABILITY/WEATHERIZATION-ASSISTANCE-PROGRAM](http://wvcad.org/sustainability/weatherization-assistance-program)

## **7.0 – HEALTH AND SAFETY CATEGORIES**

### **7.1 – AIR CONDITIONING AND HEATING SYSTEMS**

**Air Conditioning** - Research indicates that of all people who die of heat stroke, about 80 percent (80%) are age 50 or older. Deaths attributed to lung disease, diabetes and hypertension increase more than 50 percent (50%) during heat waves. Heat stroke occurs 12 to 13 times more frequently in people age 65 and older than in younger persons. It is also an accepted medical fact that infants and children up to 4 years of age are very sensitive to the effects of high temperatures and rely on others to regulate their environment.

Considering preventable deaths may illuminate the need for allowing air conditioning measures. While there are no statistics devoted specifically to that category in West Virginia, the next two (2) paragraphs are devoted to understanding the health risks in our state that relate to the statements above.

According to the Centers for Disease Control and Prevention (CDC) National Center for Health Statistics, in 2015 there were 1,628 deaths in West Virginia due to Chronic Lower Respiratory Disease. 1,079 West Virginians died from stroke,

and 784 people in West Virginia died from diabetes. The CDC reports that in 2014, 12.0 percent (12.0%) of adult West Virginians were diagnosed with non-pregnancy related diabetes.

While hypertension is the most prevalent cause of stroke and kidney failure, hypertension must be recognized as part of a bigger disease conglomerate almost always accompanied by obesity, diabetes, kidney disease or many other co-existing problems involving lifestyle and/or genetics. The West Virginia Department of Health & Human Resources Division of Health Promotion and Chronic Disease 2013 report shows over 40 percent (40%) of West Virginia adults have been told by a health care professional that they have hypertension which was ranked second highest nationally at that time. The same report goes on to state that more than 40 percent (40%) who had their cholesterol checked were told they had high cholesterol. This is of 78.7% that had the cholesterol checked in the past five years (50.76%), which puts them at greater risk for developing heart disease and stroke.

Air conditioning is the number one (1) protective factor against heat-related illness and death effecting people with health issues such as those stated above. **Therefore, air conditioning system replacement, repair or installation is allowed to be categorized as Health and Safety in homes with occupants under 4 years old, over 65 years old and/or where there are “at-risk” occupants.** Air conditioning system replacement, repair or installation must be attempted through cost justification as an ECM first before using Health and Safety funding. Where this measure can be justified by the approved NEAT/MHEA audit, replacement, repair or installation is not to be included in Health and Safety. New replacement units must be ENERGY STAR rated and have an efficiency rating of at least:

- Central AC or Heat Pump Cooling Efficiency = 13 SEER
- Heat Pump Heating Efficiency = 7.7 HSPF
- Window and wall mount air conditioners = 10 EER

**Heating Systems** - Heating system repair, replacement, or installation is allowed of red-tagged, inoperable, or nonexistent heating systems where climate conditions warrant. Repair and replacement of inoperable or unsafe combustion appliances is allowed, including the installation of direct vent-sealed combustion appliances. Direct vent-sealed combustion appliances may be installed to resolve Combustion Appliance Zone (CAZ) problems. Repair and cleaning must be considered before replacement. Correction of venting is allowed when testing indicates a problem.

## 7.2 - ASBESTOS – ALL

### 7.2A – ASBESTOS - IN SIDING, WALLS, CEILINGS, ETC.

Removal of siding is allowed when performing energy conservation measures. All precautions must be taken to not damage siding. Asbestos siding should never be cut or drilled. It is recommended where possible to insulate through home interior. The client will be informed that suspected asbestos siding is present and what precautions will be taken.

### 7.2B – ASBESTOS - IN VERMICULITE

When vermiculite insulation is found in an attic, unless testing proves otherwise, take precautionary measures as if the vermiculite contains asbestos. Encapsulation by an appropriately trained asbestos control professional is allowed. Removal is not permitted. Blower door testing should be done with pressurization rather than depressurization.

Assess whether vermiculite is present. Asbestos Hazard Emergency Response Act of 1986 (AHERA) certified prescriptive sampling is allowed by a certified tester.

Clients should be instructed not to disturb suspected asbestos containing material.

### 7.2C – ASBESTOS - ON PIPES, FURNACES, OTHER SMALL COVERED SURFACES

Subrecipients will assume asbestos is present in covering materials. Encapsulation is allowed by an AHERA asbestos control professional and should be conducted prior to blower door testing. Removal may be allowed by an AHERA asbestos control professional on a case-by-case basis. AHERA testing is allowed by a certified tester. Clients should be instructed not to disturb suspected asbestos containing material.

### 7.2D – BLOWER DOOR TESTING IN DWELLINGS WITH SUSPECTED ASBESTOS CONTAINING MATERIALS (ACM)

Where the presence of asbestos or other potentially hazardous material is known or suspected, all **relevant state and federal (EPA) guidelines must be followed to ensure worker and occupant safety**. Blower door depressurization tests may not be performed in homes ***where there is a risk of asbestos becoming airborne and being drawn into the dwelling***. Respirators with filter cartridges must be worn when working in areas where exposure to airborne particulates is a risk.

Although Building Performance Institute standards (BPI Technical Standards for the Building Analyst Professional v1/4/12mda.) do not specifically prohibit pressurization, the emphasis is on the risk of asbestos becoming airborne. Blower door activities in the presence of damaged ACM (friable asbestos) pose a



risk of causing the fibers to become airborne. Proper precautions should be taken to avoid risk of causing asbestos particles to become airborne, this is it recommended that no blower door testing take place where friable asbestos is present.

Once the ACM is properly repaired, sealed or removed by a properly licensed and qualified professional, then blower door testing may proceed.

#### **7.5 – BIOLOGICALS AND UNSANITARY CONDITIONS**

The detection and remediation of mold, odors, viruses, bacteria, unsanitary conditions, and rotting wood is often beyond the scope of the Weatherization Assistance Program and may be a reason for deferral. Since workers often encounter these conditions, they try to remedy the situation if possible and take precaution to not exacerbate any potential problem. Factors such as cleaning agents, paints and turpentine, gasoline, sewage, animal waste, and excessive dust can sometimes be addressed to allow weatherization work to occur. Auditors will inform the client of observed conditions.

#### **7.6 – BUILDING STRUCTURE AND ROOFING**

WV WAP crews often encounter homes in poor structural condition. In some cases, WAP services must be deferred until the dwelling is made safe and able to weatherize. When possible, subrecipients can coordinate their efforts with other programs to enable and enhance services. Homes with conditions that require more than incidental repair should be deferred unless repairs can be made with non-DOE funds.

The auditor will perform a visual inspection to ensure that access to areas necessary for weatherization are safe for entry and performance of assessment, work, and inspection. The client will be notified of structurally compromised areas.

#### **7.7 – CODE COMPLIANCE**

The correction of pre-existing code compliance issues is not an allowable cost other than where weatherization measures are being conducted.

As per DOE WPN 17-07:

“Correction of pre-existing code compliance issues is not an allowable cost other than where weatherization measures are being conducted. State and local (or jurisdiction having authority) codes must be followed while installing weatherization measures. Condemned properties and properties where “red tagged” Health and Safety conditions exist that cannot be corrected under this guidance should be deferred.” Testing required: “Visual inspection. Local code enforcement inspections”, the

subrecipient personnel should also “Inform client of observed code compliance issues” according to the guidance.

### **7.8 – COMBUSTION GASES**

Proper venting to the outside for combustion appliances, including gas dryers is required. Correction of venting is allowed when testing indicates a problem.

Subrecipients will be required to conduct combustion safety testing when combustion appliances are present. The subrecipient must also upload pre and post draft/combustion tapes to the client file in DBA FACS Pro.

Subrecipients will conduct inspection and testing of Combustion Appliance Zones (CAZ) and confirm adequate clearances and test naturally drafting appliances for draft and spillage under worst case conditions before and after air tightening and inspect gas cooking appliances for safe operability.

Subrecipients will provide the client with combustion Safety and Hazards information, including the importance of using exhaust ventilation when cooking and the importance of keeping burners clean to limit the production of Carbon Monoxide (CO).

- **Appliances and Water Heaters** - Poorly functioning water heaters that may pose a health concern may be replaced on a case-by-case basis. Installation of one (1) water heater per dwelling is allowed. Repair, replacement and installation of moisture control appliances, such as dehumidifiers, condensate pumps and sump pumps are allowable on a case-by-case basis. Documentation must be maintained to justify replacement of water heaters and moisture control appliances. Replacement and installation of other appliances for health and safety reasons is not allowed. Repair and cleaning for other appliances is allowed.

### **7.9 – ELECTRICAL**

**Electrical - Other than Knob-and Tube Wiring** - Minor electrical repairs are allowed where health and safety of the occupant is at risk. Upgrades and repairs are allowed when necessary to perform specific weatherization measures.

Auditors will perform a visual inspection. Voltage drop and voltage detection testing are allowed.

**Electrical – Knob-and Tube Wiring** - Minor upgrades and repairs necessary for weatherization measures and where the health or safety of the occupant is at risk are allowed.

Where live knob-and-tube wiring exists, the following conditions must be met in order to install attic insulation:

- Wiring insulation must be intact and complete with no exposed areas and connections.
- S-type fuses that match the size of the wiring must be installed if they do not already exist. Any modification of the electrical panel must have prior written permission from the client. The subrecipient may wish to contract with a licensed electrician where questionable safety conditions exist.
- When installing cellulose or fiberglass, there must be a minimum of 1" clearance from the wiring. Precaution must be taken to prevent the possible drifting of the product, which could result in contact with the wiring.

The presence of knob-and-tube wiring, overloaded circuits, live bare wires, asbestos siding, or untreatable moisture in the wall cavities will be allowable reasons for not insulating exterior walls. If the problems can be corrected within reasonable means, the walls may be insulated.

#### **7.10 – FORMALDEHYDE, VOLATILE ORGANIC COMPOUNDS (VOCs), FLAMMABLE LIQUIDS, AND OTHER AIR POLLUTANTS**

Crew awareness of potential problems with formaldehyde and volatile organic compounds is important when addressing air sealing. Crews are instructed to remove any VOCs when possible and to give client education regarding the potential dangers. If removal cannot be performed or is not allowed by the client, the unit must be deferred.

#### **7.11 – FUEL LEAKS**

Auditors will inspect and test for gas or oil leakage at connections of natural gas, propane piping, or oil systems. If leaks are found, immediate action will be taken to notify occupant to help ensure leaks are repaired. If the Auditor determines an immediate need for repair, he will notify the client and the proper personnel in order to remedy the leaks. Leaks will be documented and become a part of the Audit report. The report will specify repair for leaks and replacement for hazardous or damaged gas or oil connectors and pipes. Severe natural gas and LP gas leaks, procedures defined in NFPA National Fuel Gas Code Appendix E. Oil leaks will be repaired by qualified personnel.

NFPA National Fuel Gas Code Appendix E Emergency Procedures:

Where an investigation discloses a concentration of gas inside of a building, it is suggested the following immediate actions should be taken:

1. Clear the room, building or area of all occupants. Do not reenter the area until it has been determined to be safe.
2. Use every practical means to eliminate sources of ignition. This includes, but is not limited to: matches, lighters, operating electrical switches or devices,

opening furnace or other appliance doors and operating telephones.

3. If possible, cut off all electric circuits at a remote source to eliminate operation of automatic switches in the danger area. Safety flashlights designed for use in hazardous atmospheres are recommended for use in such emergencies.
4. Notify all personnel in the area and the gas supplier from a remote telephone away from the leak.
5. Ventilate the affected portion of the building by opening windows and doors.
6. Shut off the supply of gas to the areas involved.
7. Investigate other buildings in the immediate area to determine if there is escaping gas.

#### **7.12 – GAS OVENS / STOVETOPS / RANGES**

Subrecipients or contractors will follow the BPI Technical Standards (v1/4/12) when addressing gas/propane ovens.

Range tops and ovens produce moisture and oxides of nitrogen. Excess moisture is not good for the durability of the home (possibly contributing to mold problems) and NOX is not healthy. These combustion appliances are capable of producing CO, which is a health hazard. In all cases a carbon monoxide detector is recommended and homeowners should use exhaust ventilation when using these appliances. New appliances may require an extended warm up period to reach steady state.

1. Remove any items/foil in or on oven.
2. Make sure self-cleaning features are not activated, set oven to highest setting.
3. Test oven for CO in the flue, before dilution air.
4. After 5 minutes of operation, check for steady state:
  - **Level I Action - 100 ppm to 300 ppm** as measured you must install a carbon monoxide detector and recommendation for service must be made to the consumer.
  - **Level II Action - Greater than 300 ppm** as measured - the unit must be serviced prior to work. If greater than 300 ppm after servicing, exhaust ventilation must be provided with a capacity of 25 CFM continuous or 100 CFM intermittent.

**\*Continually monitor ambient CO levels during test.**

Since all gas cooktops generate CO and it is difficult to simulate an actual operating condition for these appliances during the course of a typical house inspection, specific action levels for these burners are not specified by BPI. However, technicians must specify appropriate measures to mitigate potentially dangerous CO production of these units. ASHRAE exposure limits for CO shall be referenced when making recommendations for CO control in these areas. The recommended ASHRAE limit for 24-hour exposure of 9 ppm shall be applied to building occupants. In most cases, it will not be possible to effectively test for this condition, however the following measures shall be recommended whenever gas cooktops exist in the home:

- If burners do not ignite properly or do not burn cleanly, a clean and tune of the appliance shall be recommended.
- If the appliance is located in a confined space and mechanical ventilation is not readily available, mechanical ventilation shall be recommended.

Ventilation provided for unvented gas ovens must provide a minimum capacity of 25 cfm continuous airflow or 100 cfm intermittent.

#### **7.13 – HAZARDOUS MATERIALS DISPOSAL**

**[LEAD, REFRIGERANT, ASBESTOS, MERCURY (INCLUDING CFLS/FLUORESCENTS), ETC.]**

*Subrecipients or contractors will establish a program of regulation for the disposal of hazardous materials and waste in accordance with local, state, (Hazardous Waste Management Act - Chapter 22 Article 18.) and federal standards (CFR title 40 CFR 260-273).*

#### **7.14 – INJURY PREVENTION OF OCCUPANTS AND WEATHERIZATION WORKERS**

Minor repairs may be done when weatherizing a home in order to prevent injury to weatherization workers and to occupants. These repairs may only be done to the extent of ensuring safety.

#### **7.15 – LEAD BASED PAINT**

Subrecipients or contractors will follow EPA's Lead; Renovation, Repair and Painting Program (RRP) which includes becoming a certified lead renovation firm. In addition to RRP, weatherization requires all weatherization crews working in pre-1978 housing to be trained in Lead Safe Weatherization (LSW). Deferral is required when the extent and condition of lead-based paint in the house would potentially create further Health and Safety hazards.

Testing is allowed. Job site setup and cleaning verification is required by a Certified Renovator.

Each subrecipient or contractor must give notification to the occupants of homes to be weatherized regarding the potential hazards of lead paint and lead paint

dust if the home was built prior to 1978. The EPA's publication "Renovate Right: Important Lead Hazard Information for Families, Child Care Providers and Schools" must be given to an adult occupant of the affected home prior to beginning weatherization. For occupied homes, the weatherization staff, crew, or contractor must have an adult tenant or homeowner sign an acknowledgement after receiving the pamphlet. As an alternative to delivery in person, the subrecipient or contractor may mail the lead hazard information pamphlet to the owner and/or tenant. The pamphlet must be mailed at least seven (7) days before renovation. Mailing must be documented by a certificate of mailing from the post office.

WVDO developed and implemented a *Lead Safe Work Policy* on July 27, 2012, including standardized forms and processes to supplement information available from DOE and the EPA (This policy was amended August 16, 2013). The policy provides additional information and guidance on LSW, proper practices, and documentation requirements.

LSW includes weatherization worker protection, general LSW practice standards, and lead dust containment standards.

1. Level 1 Containment:

- a. Level 1 containment is required in pre-1978 homes when less than 6'2" of interior painted surface per room or 20'2" of exterior painted surface will be disturbed.
- b. Level 1 containment consists of methods that prevent dust generation and contains all debris generated during the work process. The containment establishes the work area which must be kept secure.
- c. Measures that may fall within this guideline include:
  - i. Installing or replacing a thermostat
  - ii. Drilling and patching test holes
  - iii. Replacing HEPA filters and cleaning HEPA vacuums
  - iv. Changing furnace filter(s)
  - v. Removing caulk or window putty (interior)
  - vi. Removing caulk or window putty (exterior)
  - vii. Removing weather-stripping

2. Level 2 Containment:

- a. Level 2 containment is required when weatherization activities will disturb more than 6'2" of interior surface per room or 20'2" of exterior surfaces in homes built prior to 1978. Level 2 containment consists of methods that define a work area that will not allow any dust or debris from the work area to spread. Level 2 containment

requires the covering of all horizontal surfaces, constructing barrier walls, sealing doorways, covering HVAC registers with approved materials, and closing windows to prevent the spread of dust and debris.

- b. Measures requiring Level 2 containment may include:
    - i. Drilling holes in interior walls
    - ii. Drilling holes in exterior walls, removing painted siding
    - iii. Cutting attic access into ceiling or knee walls
    - iv. Plane a door in place
    - v. Replacing door jambs and thresholds
    - vi. Replacing windows or doors
    - vii. Furnace replacements
  - c. Additionally, Level 2 containment must ALWAYS be used where any of the following is conducted (even if the activities will disturb less than the hazard levels within the Level 1 category):
    - i. Window replacement
    - ii. Demolition of painted surface areas
    - iii. Using any of the following: Open-flame burning or torching; machines to remove paint through high-speed operation without HEPA exhaust control; or operating a heat gun at temperatures at or above 1,100 degrees Fahrenheit.

**Note:** The use of a drill, reciprocating saw, or other power tool is considered a “machine” for removing paint. Examples include: Cutting a hatch inside the dwelling or interior drilling of holes for the installation of insulation require Level 2 containment.
3. There must be adequate documentation in the client file to demonstrate that LSW measures were performed when necessary. Documentation should include photos of the site and containment set up, as well as a listing of materials used and measures taken. Quality Control Inspector must also certify that LSW procedures were used and properly implemented.
  4. WV WAP will adhere to EPA lead safe rules as written in the *Lead; Renovation, Repair, and Painting Program Final Rule* (LRRPP Final Rule), as directed by DOE.
  5. Weatherization of HUD program housing stock, including HUD Section 8, is infrequent in West Virginia. These units will only be weatherized if the owner provides a “Certificate of Lead-Based Paint Compliance” (copy must be in client file) that documents abatement or control of any lead

paint hazard has been addressed and will agree that the local subrecipient will not be liable for any lead hazards, provided the safe work practices generally outlined above are employed.

6. In cases where the subrecipient cannot safely weatherize a home due to lead paint hazards, the subrecipient may defer the work. Such deferral will be considered by WVDO on a case-by-case basis. Subrecipients may not weatherize dwellings where there are cases of documented or suspected lead poisoning. Additionally, subrecipients will not weatherize homes where there is an extraordinary lead paint hazard with no means to abate the hazard, including insufficient funds or insufficient training to properly address the hazard.

#### **7.16 – MOLD AND MOISTURE**

The Weatherization Assistance Program is not a mold remediation program. The use of DOE funds for the removal of mold and other related biological substances is not an allowable weatherization expense. Mold testing is not an allowable cost. If necessary, Weatherization Assistance Program services may need to be deferred until the existing mold problem can be corrected or referred to another program for funding of remedial action.

All homes will be inspected for previous and existing moisture problems using the WV WAP “Mold and Moisture Assessment Findings Form” to document existing mold and moisture related problems in homes.

Moisture, mold, and mildew can seriously affect the health and safety of the client and crew. Steps must be taken to alleviate moisture problems. The WV WAP will ensure that regular weatherization work is performed in a manner that does not contribute to the increase of any mold problems, and when the work is performed properly, can alleviate many mold conditions.

- **Drainage** - Auditors will conduct a visual inspection. Major drainage issues are beyond the scope of the Weatherization Assistance Program. Homes with conditions that may create a serious health concern that require more than simple repair should be deferred.

#### **7.17 – PESTS**

- Pest removal is cause for deferral unless other funds are available, or the cost is considered when running NEAT or MHEA. Screening of windows and points of access is allowed to prevent pest intrusion.
- Auditors will assess the presence and degree of infestation and risk to workers.
- Auditors will inform clients of the observed condition and associated risks.



### **7.18 – RADON**

- Provide the client with EPA’s consumer guide to radon.
- Whenever conditions permit, exposed dirt must be covered with a vapor permeable ground cover.
- In dwellings where radon may be present, precautions should be taken to reduce the likeliness of making radon concentrations higher.
- Radon testing is an allowable DOE expense in locations with high radon potential.
- Radon abatement is not an allowable activity with DOE funds; major radon problems are deferred and referred to the appropriate local environmental agency.

### **7.19 – SAFETY DEVICES: SMOKE AND CARBON MONOXIDE ALARMS, FIRE EXTINGUISHERS**

If smoke alarms are inoperable or non-existent, at least one (1) alarm must be installed in each weatherized dwelling on each floor. Follow the manufacturer’s recommendations for locating and installing the alarm(s). If existing hard-wired smoke alarms are inoperable or broken, they must be replaced with comparable units. Replacement of operative smoke alarms is not an allowable expense. Typically, alarms are installed where the clients spend the most time, such as near bedrooms.

An approved CO alarm will be installed in all homes where functional CO detector/warning equipment does not already exist. CO detectors will comply with UL 2075. Single-station CO alarms will comply with UL 2034 and will be installed in accordance with local code and the manufacturer’s installation instructions. If an entire multi-family building is to receive weatherization services, a CO alarm should be installed in each unit of the complex.

Providing fire extinguishers is allowable only when solid fuel is present. Subrecipient will provide the client with verbal and written information on use of smoke/CO detectors and fire extinguishers where allowed.

### **7.20 – OCCUPANT HEALTH AND SAFETY CONCERNS AND CONDITIONS**

WV WAP subrecipients are required to take all reasonable precautions against performing work on dwellings that will subject clients to health and safety risks. Before beginning work on the dwelling, the subrecipient must take into consideration the health concerns of each occupant, the condition of the dwelling, and the possible effect of work to be performed on any particular health or medical condition of the occupants. When a person’s health is fragile and/or the work activities would constitute a health or safety hazard, the occupants at risk will be required to leave the home during these work activities.

When a person’s health may be at risk and/or the work activities could constitute a health or safety hazard, the occupant at risk will be required to take appropriate

action as previously identified, based on severity of risk. Temporary relocation of at-risk occupants may be allowed on a case by case basis. Failure or the inability to take appropriate actions must result in deferral.

#### **Procedure for Identifying Occupant Health Concerns**

- When a person's health may be at risk and/or the work activities could constitute a Health and Safety hazard, the occupant at risk will be required to take appropriate action based on the severity of the risk.
- The at-risk occupant should reveal they have known or suspected health concerns during the initial application for weatherization services.
- The at-risk occupant should be provided with known risks of the weatherization process.
- Subrecipient contact information should be provided to the occupant so that the occupant can easily provide information about health issues or concerns.
- Failure or the inability to take appropriate actions must result in deferral of the weatherization work.

#### **Documentation for identifying occupant health concerns will include:**

- Client's name and address;
- Dates of the audit/assessment and when the client was informed of a potential; health and safety issue;
- Clear description of the problem;
- Statement indicating if, or when weatherization could continue; and
- Client(s) signature(s) indicating that they understand and have been informed of their rights and options.

#### **7.21 – VENTILATION AND INDOOR AIR QUALITY**

A complete review of the current version of ASHRAE minimum ventilation standards was completed including effective methods for full compliance to ASHRAE 62.2-2016. Training will occur throughout the Program Year.

Weatherization trained personnel will calculate the ventilation requirements for each home utilizing the current ASHRAE spreadsheet or Residential Energy Dynamics (RED) online tool to ensure adequate indoor air quality. Continuous and/or intermittent ventilation fans will be installed based upon spreadsheet calculations. The ASHRAE 62.2-2016 standard was released in 2016 and implemented by the WV WAP for Program Year 2017 – 2018. WVDO weatherization specialist field/technical monitors will monitor to this standard for PY 2017 – 2018.

For homes that require added ventilation, subrecipients must implement a ventilation strategy that meets the requirements of the current ASHRAE standards. Subrecipients are required to evaluate any pre-existing mold and moisture conditions, potential spot ventilation needs and pre and post fan flow rates. If

whole-house ventilation requirements are **less than or equal to 15 CFM**, then additional ventilation is not required. If the Energy Auditor's pre-site evaluation determines that due to existing conditions the threshold ventilation is warranted, it will be allowed.

If the whole-house minimum ventilation requirement is **greater than 15 CFM**, a system supplying the design ventilation airflow must be installed. The subrecipient Quality Control Inspector will verify that fan flow rates have been met based on design requirements.

Implementing ASHRAE 62.2 will not be required where acceptable indoor air quality already exists. Existing ventilation systems will not be updated if found to be adequate and in good operating condition.

Subrecipients will provide clients with information on function, use, and maintenance of ventilation systems and components. Subrecipients will provide a disclaimer that current ASHRAE 62.2 does not account for high polluting sources or guarantee indoor air quality.

#### **7.22 – WINDOW AND DOOR REPLACEMENT, WINDOW GUARDS**

Replacement, repair or installation of windows or doors is not an allowable Health and Safety cost but may be allowed as an efficiency measure if justified by the NEAT or MHEA audit. If window and door replacement, repair or installation is limited in scope such as less than three (3) windows and only one (1) door. The measures may be included as infiltration reduction (NEAT) and general air sealing (MEHA) as long as the SIR is greater than one (1) for the measure.

#### **7.23 – WORKER SAFETY (OSHA, ETC.)**

Weatherization personnel must follow applicable OSHA standards and Safety Data Sheets (SDS) and take precautions to ensure the health and safety of themselves and other personnel. SDS must be posted wherever workers may be exposed to hazardous materials.

Subrecipients must perform assessments to determine if crews are practicing and utilizing safe work practices and that all workers receive training specific to hazards that the worker can reasonably expect to encounter on a particular job site.

- Subrecipients are also required to have bi-monthly safety meetings.
- All auditors, crews, and contractors must use and understand the importance of Personal Protection Equipment (PPE).
- OSHA 10 training for all current weatherization personnel. OSHA 30 for all crew leaders is not required but considered a best practice.
- Confined spaces – such as crawl spaces and attics – are not designed for continuous occupancy and are difficult to exit in the event of an emergency. People working in confined spaces face life-threatening hazards including toxic

substances, electrocutions, explosions, and asphyxiation. See 29 CFR 1926, Subpart AA from OSHA for details in addressing confined spaces. The subrecipient is required to have a written plan in place regarding confined spaces which is available upon request.

#### **CLIENT EDUCATION**

As mentioned in *Section V.8.4 Training and Technical Assistance Approach and Activities*, Energy Education is one of the most important weatherization processes to ensure the maximum effectiveness of the weatherization measures and each subrecipient has at least one (1) certified Energy Educator. The Energy Education process, educational materials used, and forms utilized (described in *Section V.8.4*) will encompass all weatherization measures installed, including any Health and Safety related information or issues identified/ corrected, or those that could be encountered if the integrity of measures is altered, measures are removed, made not to function or damaged, or proper maintenance is not performed as instructed. WVDO has added an additional client file document requirement that has a client sign-off that includes (but is not limited to) whether client education took place and all education/maintenance information necessary was communicated. This form supplements current client education documents which also includes client and subrecipient sign-offs.

**U.S. DEPARTMENT OF ENERGY  
WEATHERIZATION ASSISTANCE PROGRAM  
QUALITY CONTROL INSPECTION FORM**

**Subrecipient :** \_\_\_\_\_ **Job #:** \_\_\_\_\_

**Inspection Date:** \_\_\_\_\_

**Client Name:** \_\_\_\_\_  **Owner**  **Renter**

**Physical Address:** \_\_\_\_\_ **Zip Code:** \_\_\_\_\_

**Year of Construction:** \_\_\_\_\_ **Pre-1978 Home:**  **Yes**  **No**

**Housing Type:**

**Site Built**  **Mobile Home**  **Mobile Home w/add-on**  **Multi-family**  **Double Wide**

**Primary Fuel Type:**

**Natural Gas**  **Propane**  **Electric**  **Oil**  **Solid Fuel** **Other:** \_\_\_\_\_

<b>DBA FACS Pro FILE REVIEW</b> <small>WV WPN 15-19</small>	<b>YES</b>	<b>NO</b>	<b>N/A</b>	<b>Notes:</b>
1. Eligibility Determination present?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Input Report	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Energy Audit Recommended Measures Report	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. DBA FacsPro Job Summary	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Total Job Cost: DOE/DHHR Investment: \$ _____ Utility Investment: \$ _____ Total Job Investment: \$ _____				
6. Daily Material In/Outs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Utility Partnership Documentation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Weatherization Assistant Work Order	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. Lead Safe Work Documentation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
10. Mold/Moisture Form Documentation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
11. CO Warning Statement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
12. Hold Harmless Form Documentation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
13. State Historic Preservation Documentation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
14. Client Education Documentation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
15. Refrigerator Data / Replacement Justified	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
16. Pre & Post Combustion Safety Tests/Tapes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
17. Pre & Post Blower Door Results (@CFM 50) Pre #: _____ Post #: _____ QCI verified#: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
18. Customer Satisfaction Form Signed/Dated	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
19. HVAC Sizing Documentation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
20. Solid Fuel Appliance Condition Report	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
21. WX Tag Documentation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
22. Photo Documentation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
23. FACS Pro Attachments are complete	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
24. Insulation Certificate Documentation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
25. Other (Describe): _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

## ON-SITE WORK ASSESSMENT

	YES	NO	N/A	
<b>HEATING, VENTILATION, AIR CONDITIONING</b>				<b>Comments – HVAC</b>
1. Heating System Replacement <i>WV WAP SWS 5</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Air Conditioning Replacement <i>WV WAP SWS 2.2</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Heating System Tune-Up	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Air Conditioning Tune-Up	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Distribution System Modifications	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Ducts <i>WV WAP SWS 3.16, 4.16</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Thermostat Anticipator Reading Verified	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Filter Installed and one left with client	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. Measures(s) were Properly Justified	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
10. Ventilation Requirements Verified and Comply with ASHRAE 62.2 2013 <i>WV WAP SWS 6</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
11. CAZ Testing Verified, Documentation is Complete	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
12. Work Meets WV WAP SWS Installation Standards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>ATTIC</b> <i>WV WAP SWS 3.10, 2.06, 2.04</i>				<b>Comments – Attic Work</b>
1. Attic Insulation Installed: <i>WV WAP SWS 4</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Coverage R-value	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Insulation Certificate Completed & Posted	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Heat Source/ Vent Damming	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Junction Box Markers Present	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Attic Access Insulated and Secured	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Attic Air Sealing was Performed <i>WV WAP SWS 3.10</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Measure(s) were Properly Justified	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. Work Meets WV WAP SWS Installation Standards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>SIDEWALLS &amp; KNEEWALLS</b> <i>WV WAP SWS 2.06, 3.11, 4.11</i>				<b>Comments - Sidewalls</b>
1. Walls Insulated by WAP	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Plugs, Patching, & Painting appropriate	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Measure(s) were Properly Justified	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Work Meets WV WAP SWS Installation Standards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>SUBSPACE</b> <i>WV WAP SWS 2.04, 2.05, 3.14, 3.13, 4.13, 4.14</i>				
1. Bandboard Insulation added by WAP	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Floor Insulation added by WAP	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Basement Wall Insulation added by WAP	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Vapor Barrier added; Coverage & Secure	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Measure(s) were Properly Justified	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Work Meets WV WAP SWS Installation Standards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>WINDOWS/DOORS</b> <i>WV WAP SWS 3.12</i>				<b>Comments – Windows/Doors</b>
1. Number of Windows Replaced: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Number of Storm Windows Installed: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Number of Doors Replaced: _____	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. Door Weather-stripping/Thresholds/Sweeps	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Pre/Post Photo Documentation Completed	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Measure(s) were Properly Justified	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Work Meets WV WAP SWS Installation Standards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

**OTHER MEASURES** WV WAP SWS 7

YES NO N/A

Comments – Other Measures

- 1. Water Heater Replacement
- 2. Water Heater Treatment (Tank Wrap)
- 3. Pipe Insulation
- 4. Low Flow Shower heads
- 5. Lighting - CFLs Installed
- 6. Refrigerator Replacement
- a. Metering/Justification/other documentation
- 7. Smoke Detectors WV WAP SWS 2.03
- 8. Carbon Monoxide Detector
- 9. Other H&S Measures \_\_\_\_\_
- 10. Other Energy Related Repairs \_\_\_\_\_
- 11. Air Sealing Measures
- 12. Other (Describe): \_\_\_\_\_
- 13. Measures were Properly Justified
- 14. Work Meets WV WAP SWS Installation Standards

**Weatherization Assistant 8.9 Audit**

1. All IRMs are justified in the client file with an explanation for their need and relationship to the specific energy conservation measure (ECM) or group of ECMs.

YES  NO  N/A

2. ECMs are all justified with a SIR >1. *Exception: Air Sealing DOE WPN 13-5 Attachment 1*

YES  NO  N/A

3. Ancillary items are charged to the appropriate ECM.

YES  NO  N/A

4. Are materials charged appropriately according to the current WA Materials Chart?

YES  NO  N/A

**Does this unit need additional attention from the Subrecipient?**  Yes  No

(\*Add comments on additional pages if necessary, \*\* A check in the yes box requires completion of the Required Corrective Action(s) Page)

Notes:

**REQUIRED CORRECTIVE ACTION(s)**

All corrections must be completed and signed off by the crew leader. When corrections are completed the Quality Control Inspector (QCI) must sign off affirming that required deficiencies were addressed to WV WAP SWS, state policy and all relevant building codes. If job was inspected and all corrections were made on the final day of job, crew leader (CL) and QCI must sign Work Order to verify completion. Final day inspections must reflect corrections cited by QCI. Report must be included in client file.

Last Revised 8/18/2016

CL      QCI

### Corrections

<input type="checkbox"/>	<input type="checkbox"/>	_____
		_____
<input type="checkbox"/>	<input type="checkbox"/>	_____
		_____
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		_____
<input type="checkbox"/>	<input type="checkbox"/>	_____
		_____
<input type="checkbox"/>	<input type="checkbox"/>	_____
		_____

**\*\*\*Crew Leader Signature is only required if corrections are made\*\*\***

Crew Leader Name (Print): \_\_\_\_\_

Signature: \_\_\_\_\_ Date:    /    /

QCI Name (Print): \_\_\_\_\_

Signature: \_\_\_\_\_ Date:    /    /

- WX tags has been correctly initialed, dated and posted in the correct locations.
- I hereby confirm that this job is considered complete, that all measures have been properly justified, all documentation is complete, properly uploaded into the database system and the job can be reported as a completion.





## DOE, DHHR, Utilities (as applicable)

v.10.2014

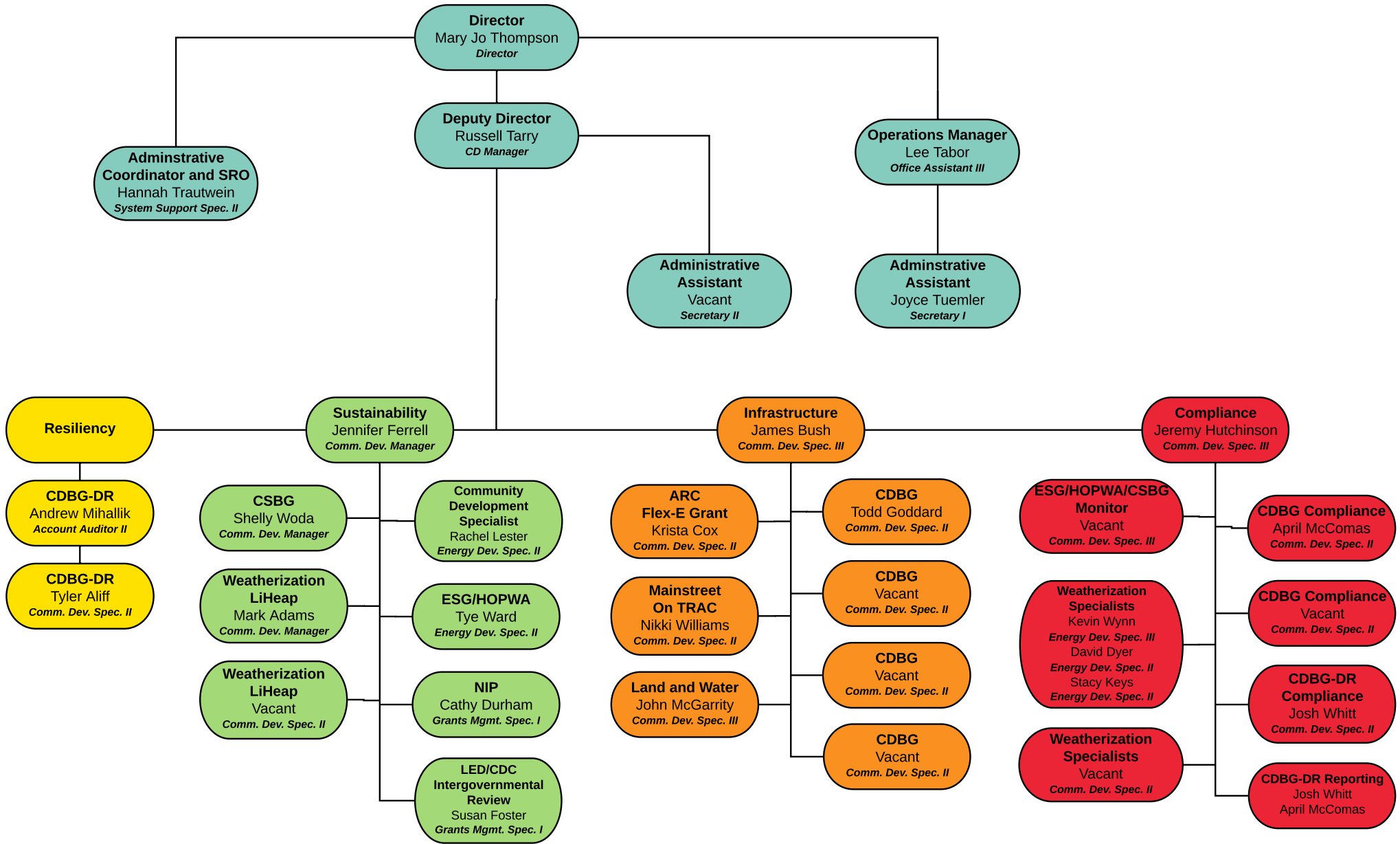
<b>Energy Conservation Measure</b>	<b>Direct material for Energy Conservation Measure</b>	<b>Ancillary Items (Cost must be included in SIR for associated individual ECM)</b>	<b>Incidental Repair Measure (IRM) (Cost must be included in SIR for whole unit package of ECM)</b>	<b>Health &amp; Safety Measure (Separate cost justification, not included in SIR)</b>
<b>Heating</b>	heating system clean/tune	black pipe	drywall	barometric damper
	heating system repair	black pipe fittings	lumber	black pipe
	heating system replacement	barometric damper	paneling	black pipe fittings
	heat pump replacement	breaker	plywood	blower motor
		coil cleaner		breaker
		condensate pump		B-vent & Accessories
		cottage stands		coil cleaner
		drywall		condensate pump
		filter grills		contactor
		floor register		electric heat strip
		furnace filter		electrical disconnect
		metal flex tape		fan switch
		mounting brackets		filter grills
		mounting pad		flexible gas line
		oil filter		floor registers
		pvc pipe		fuel filter canister
		sheet metal one sheet or less		furnace filters
		strapping		heat chamber
		thermostat		heat shield
		wire		heat shield insulators
				heat tape (condensate line)
				heating system repair
				heating system replacement
				knob & tube wiring (minor repair)
			louvered door	
			limit	
			oil filters	
			oil nozzles	
			pipe insulation (condensate line)	
			pvc pipe	
			stove pipe & accessories	
			thermocouple	
			thermostat	
			transfer grille	
			transformer	
			wire	
<b>Air Conditioning</b>	cooling system replacement	freon	drywall	a-coil
		furnace filter	lumber	air filters
		line set	plywood	blower motor
		metal duct tape		breaker
		mounting pad		contactors
		sheet metal		diffusers
		straps		electrical disconnect
		thermostat		filter grill
		thermostat wire		freon
		zip ties		heating element
				line set
				thermostat
			thermostat wire	

			transformer
			wire

<b>Energy Conservation Measure</b>	<b>Direct material for Energy Conservation Measure</b>	<b>Ancillary Items (Cost must be included in SIR for associated individual ECM)</b>	<b>Incidental Repair Measure (IRM) (Cost must be included in SIR for whole unit package of ECM)</b>	<b>Health &amp; Safety Measure (Separate cost justification, not included in SIR)</b>
<b>Duct Sealing</b>	2-part foam	mesh tape	s-strap	2-part foam
	flex duct	metal duct tape		flex duct
	mastic	silicone caulk		mastic
	sheet metal	zip ties		sheet metal
<b>Duct Insulation</b>	2-part foam	mesh tape		
	flex duct	metal duct tape		
	foil faced duct wrap	staples		
	vinyl duct wrap	vinyl duct tape zip ties		
<b>Attic Insulation</b>	attich hatch (ONLY when insulation is required)	ceiling plugs	attic vents (ONLY when insulation is installed)	minor roof repair of leaking roof that may create moisture/mold issue in attic insulation
	cellulose	dam materials	caulking (MH guttering ONLY when insulation is installed side lift method)	
	fiberglass	drywall (can lights)	flashing	knob & tube wiring (minor repair)
		roof coating	MH guttering (ONLY when insulation is installed side life method)	
		hinges	roll roofing	
		latches	roof coating (ONLY when insulation is required)	
		insulation		
		flashing		
		high-temp silicone sealant		
	insul-shield			
<b>Dense Pack</b>	cellulose	chair railing	primer/sealer	knob & tube wiring
		dry wall compound	roof coating (ONLY when insulation is required)	minor roof repair of leaking roof that may create moisture/mold issue in new wall insulation
		plywood (<1 sheet)		
		sealing high/low openings in balloon framing		
		sheet rock (<1 sheet)		
	wall plugs			
<b>Non-Dense Pack</b>	fiberglass	4" inspection port	flashing	
		wall plugs	MH guttering (ONLY when insulation is installed side life method)	
			primer/sealer	
			roof coating (ONLY when insulation is required)	
<b>Floor Treatment</b>	fiberglass (batt)	adhesive spray	belly repair (when insulation is required)	knob & tube wiring (minor repair)
	fiberglass (blown)	belly repair of insulation access holes (including belly patch, board, tape)	vapor barrier (when floor is insulated)	plumbing leak repair
	rigid foam board		vapor barrier ballast (when floor is insulated)	
	2 part foam	insulation support rods	vapor barrier seam tape (when floor is insulated)	
	dense pack cellulose	netting		
	pipe wrap (only when floor insulated)			

<b>Energy Conservation Measure</b>	<b>Direct material for Energy Conservation Measure</b>	<b>Ancillary Items (Cost must be included in SIR for associated individual ECM)</b>	<b>Incidental Repair Measure (IRM) (Cost must be included in SIR for whole unit package of ECM)</b>	<b>Health &amp; Safety Measure (Separate cost justification, not included in SIR)</b>
<b>Window Replacement</b>	window replacement	caulk	lumber	
		drywall	j channel	
		fasteners	coil stock	
		paneling		
		rope caulk		
		shims		
		trim		
	stops			
<b>Door Replacement</b>	door replacement	caulk	lumber	
		drywall		
		fasteners		
		hinges		
		knobs		
		paneling		
		primer/sealer		
		stops		
	trim			
<b>General Air Infiltration</b>	2 part foam (canister)	caulk	lumber-framing	
	attic hatch	ac cover	door hinges	
	belly repair (when no insulation is required)	drywall	door latches	
	caulk	hinges	lumber-trim	
	chimney draft stopper	insulation	plywood (more than one piece for air sealing)	
	door replacement	latches	primer/sealer	
	door sweeps	locks	sheetrock (more than one piece for air sealing)	
	door weatherstrips	mastic	window stop	
	duct sealing	mesh tape		
	foam (cans)	metal duct tape		
	foam sealant (cans)	rope caulk		
	foam sheets	window stop		
	glass			
	mastic			
	plywood (one piece)			
	sheetrock (one piece)			
	thresholds			
	vent termination cap			
window replacement				
window weatherstrips				

<b>Energy Conservation Measure</b>	<b>Direct material for Energy Conservation Measure</b>	<b>Ancillary Items (Cost must be included in SIR for associated individual ECM)</b>	<b>Incidental Repair Measure (IRM) (Cost must be included in SIR for whole unit package of ECM)</b>	<b>Health &amp; Safety Measure (Separate cost justification, not included in SIR)</b>
<b>Energy Improvement</b>	cfl bulb-flood/recessed	water heater straps	light fixture	replace hazardous light fixture or socket
	cfl bulb-specialty	water heater tape	light socket	water heater discharge pipe
	cfl bulb-standard			water leak repair
	cool roof coating			water heater replacement
	door replacement			
	faucet aerator-bathroom			
	faucet aerator-kitchen			
	faucet aerator-other			
	low-flow showerhead			
	low-flow showerhead-handheld			
	refrigerator replacement			
	water distribution pipe insulation-boilers			
	water heater jacket			
	water heater pw (1st 6ft only, h&c at wh)			
water heater replacement				
water heater top				
window replacement				
<b>Other Health &amp; Safety</b>				4 mil plastic (clear)
				6 mil plastic
				blue painters tape
				breakers
				B-vent & accessories
				caz resolution materials
				co detector
				co/smoke detector
				dehumidifier
				dryer vent kit
				duct tape
				electrical panel box
				exhaust vents/fans
				fan controller
				guttering and accessories
				kitchen range hood kit
				make-up air fan
				lead check swabs
				roof coating
				smoke detectors
			sump pump	
			tack mats	
			vapor barrier	
			vapor barrier ballast	
			vapor barrier seam tape	
			venting	
			water heater discharge pipe	
			water heater replacement	
			wire	



## West Virginia Secretary of State — Online Data Services

### Administrative Law

Online Data Services Help

### Administrative Law

### Meeting Notice Detail

[Back to Meeting Notices](#)

<b>Commerce, WV Department of WV Development Office - WV Community Advancement and Development</b>
<b>Date/Time:</b> 4/23/2018 -- 10:00 AM
<b>Location:</b> 1900 Kanawha Blvd., East Building 3, Conference Room 8C Charleston, WV 25305
<b>Purpose:</b> To receive comment on the proposed use of Department of Energy Weatherization Assistance Program Grant Funds.
<b>Notes:</b> This is a compliant meeting.
<b>Meeting was approved : 4/4/2018 2:57:42 PM</b>

[Back to Meeting Notices](#)

Wednesday, April 4, 2018 — 3:00 PM

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PUBLIC HEARING

RECEIVED

APR 26 2018

WV DEVELOPMENT OFFICE

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PY2018-2019 STATE PLAN  
WEATHERIZATION ASSISTANCE PROGRAM

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APRIL 23, 2018  
10:00 A.M.

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CAPITOL COMPLEX, BUILDING 3  
CONFERENCE ROOM 8C  
1900 KANAWHA BOULEVARD, EAST  
CHARLESTON, WEST VIRGINIA

---

*Evalyn Garrett Bibbee  
Certified Court Reporter*

---

**GARRETT REPORTING SERVICE**  
"PROFESSIONAL STENOMASK FOR THE RECORD"

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POST OFFICE BOX 20200 - CHARLESTON, WEST VIRGINIA 25362 - (304) 346-0460 FAX (304) 757-7425

A P P E A R A N C E S

Mark A. Adams  
Weatherization Manager  
West Virginia Development Office  
Building 3, Conference Room 8C  
1900 Kanawha Boulevard, East  
Charleston, West Virginia 25305

Jennifer Ferrell  
Manager, Community Sustainability

Rachel Lester  
Community Development Specialist

1 MR. ADAMS: Good morning and welcome to the  
2 Program Year 2018 US Department of Energy  
3 Weatherization Assistance Program Public Hearing. A  
4 sign-in sheet is being passed around and we ask you to  
5 please sign in and note who you represent.

6 I'd like to call to order the Public Hearing for  
7 the US Department of Energy 2018 Weatherization  
8 Assistance Program State Plan Application. My name is  
9 Mark Adams, and I am the Weatherization Manager of the  
10 Weatherization Assistance Program for the West Virginia  
11 Development Office (WVDO) and I will be conducting this  
12 public hearing. We are meeting this morning to hear  
13 comments on West Virginia's US DOE State Plan  
14 application for the Weatherization Assistance Program.  
15 A draft of the plan has been available since April 5th  
16 on the WV Community Advancement and Development office  
17 website and by mail if requested. There is a limited  
18 amount of copies available here today.

19 Title IV (4) of the Energy Conservation Production  
20 Act, as amended, authorizes the Department of Energy to  
21 administer the Low-Income Weatherization Assistance  
22 Program. All grant awards made under the Weatherization  
23 Assistance Program must comply with applicable law,  
24 including regulations contained in 10 CFR Part 440, and

1 other procedures applicable to these regulations as DOE  
2 may prescribe for the administration of the program as  
3 well as OMB Circular 2 CFR 200 - Uniform Administrative  
4 Requirements, Cost Principles, and Audit Requirements  
5 for Federal Awards.

6 The West Virginia Development Office has provided  
7 notice of this public hearing through advertisement in  
8 eight newspapers throughout the state. It has been  
9 posted on the West Virginia Secretary of State's website  
10 in compliance with House Bill 2717.

11 A court reporter has been engaged to prepare a  
12 transcript of the public hearing. Any written  
13 submission of views and any questions or comments from  
14 any of the attendees at the hearing will be recorded and  
15 made part of the record.

16 I'd like to thank all of you for coming.

17 During this presentation, I will stop periodically  
18 and ask for any questions and comments. When making a  
19 comment, or asking a question, please state your name  
20 and who you are representing. At the end of my  
21 presentation there will be additional opportunity for  
22 questions and comments. A transcript of this meeting  
23 will be prepared and sent to the US Department of Energy  
24 for their review.



1           Are there any questions or comments on anything  
2           that I've covered to this point?

3           Then I'll continue.

4           The Program Year 2018 - 2019 WV WAP State Plan  
5           details how we plan to deliver the annual 2018  
6           weatherization Assistance Program in West Virginia this  
7           coming program year, which runs from July 1, 2018 to  
8           June 30, 2019. The plan is the application package to  
9           DOE including but not limited to production plans, our  
10          approach to a house considered for weatherization,  
11          intake and eligibility procedures, field/technical  
12          techniques used, training and technical assistance  
13          activities, monitoring protocols, the health and safety  
14          plan, budget, and budget justification. It provides the  
15          yardstick by which DOE will measure and evaluate our  
16          performance in terms of production, expenditures,  
17          training, oversight activities, and special projects.

18          The format of the plan is based on the DOE  
19          application package. The required application components  
20          are divided into three (3) major sections; the Annual  
21          File, Master File, and Budget File. Many pieces of the  
22          files do not change significantly from year to year,  
23          while others shift due to funding or DOE requirements.

24          The Annual File contains application components

1 such as subrecipient identification and production  
2 schedule, energy saving estimates, and Leveraging  
3 Activities.

4 The Master File contains the explanation as to how  
5 the WV WAP will meet all the major WAP requirements,  
6 addressing items such as client eligibility and income  
7 verification, priorities, types of work to be done  
8 including audit and inspection procedures, and oversight  
9 activities such as monitoring and training and technical  
10 assistance.

11 The Budget File outlines the budget line items and  
12 the justification of expenses for the Grantee and  
13 subrecipient.

14 Are there any questions or comments?

15 First, I will discuss the funding and budget for  
16 the 2018 DOE Annual

17 Grant as outlined in the state plan.

18 On March 23, 2018, President Donald Trump signed  
19 the Omnibus Spending Package, H.R. 1625 which provides  
20 fiscal year (FY) 2018 appropriations through September  
21 30, 2018. Under this act, the WAP received \$251 million  
22 for formula distribution to include \$500,000 to be made  
23 available to current WAP grant recipients to develop and  
24 implement strategies to treat harmful substances, and

1 \$3,000,000 for training and technical assistance  
2 activities at Headquarters. The total allocation for FY  
3 2018 WAP is \$247,500, with the WV WAP awarded  
4 \$3,493,809. This is an increase of \$335,776 over the  
5 2017 Program Year award.

6 The award is divided into two allocations:  
7 Program Operations in the amount of \$2,908,485, and the  
8 Training and Technical Assistance or T and TA Allowance  
9 in the amount of \$585,324. The Program Operations  
10 allocation is used for the administration of the program  
11 and the delivery of weatherization services.

12 In recent years, DOE has mandated required  
13 certifications, such as Lead Renovator and Home Energy  
14 Professional Quality Control Inspector, and is currently  
15 working on changes to the Energy Auditor certification.  
16 With this demand for training and certifications  
17 conducted only at accredited training centers throughout  
18 the country, T&TA funds are allocated to cover the  
19 expenses for training to lessen the burden on the local  
20 subrecipients. T&TA funds are also utilized by the  
21 Grantee to monitor the activities of the program.

22 DOE used the funding formula outlined in 10 CFR  
23 440.10. The formula is based on several factors such as  
24 the number of low income households, Heating/Cooling



1 degree days and the residential energy expenditures for  
2 each state. West Virginia will use census data from the  
3 most recent census, 2010, in a funding formula including  
4 the number of low income homes and the land area of each  
5 county of a subrecipient's service area.

6 As stated in Weatherization Program Notice  
7 regulations, if major program changes are made after the  
8 initial public hearing for the State Plan, then an  
9 additional hearing may be required.

10 As per DOE guidance, the State Plan includes a  
11 redistribution provision to enable the Grantee to  
12 actively manage the grant and move funds as necessary to  
13 fully expend the monies during the budget period which  
14 could include moving funds between subrecipients. All  
15 budget alterations or revisions will be in accordance  
16 with all other applicable Federal rules and regulations.  
17 For program year 2018, the statutory 10 percent of  
18 administrative funds will be divided between the  
19 subrecipient and WVDO.

20 Again this year, WVDO is providing some relief to  
21 the subrecipients by allowing for an Audit line item  
22 which allows these charges to come off the top of the  
23 grant if the subrecipient meets the threshold contained  
24 in 2 CFR 200, which all WV WAP subrecipients do. The



1 cost of these audits was previously charged to the  
2 already over-burdened administrative cost category and  
3 sometimes resulted in financial audits of lesser  
4 quality. These costs will be actual costs of the  
5 weatherization portion of the audit.

6 The 2018 Grant is the second year of a project  
7 period starting in Fiscal Year 2017, anticipated to be  
8 comprised of three annual budget periods, contingent on  
9 the availability of funds. WVDO anticipates all 2017  
10 Grantee and subrecipient funds to be expended by the end  
11 of the grant period, ending June 30, 2018. WVDO will  
12 not request any carry-over for Program Year 2017.

13 Are there any questions or comments on what I've  
14 covered to this point?

15 Then I'll continue.

16 I will now discuss the network and production.  
17 The majority of the service network will remain the  
18 same as last year, with the exception of McDowell  
19 County, which will be applied for through a competitive  
20 grant application process. The county will be awarded to  
21 the Community Action Agency that is best determined to  
22 be able to service McDowell County based on the strength  
23 of the application, risk assessment, and weatherization  
24 service expertise. Funds will be distributed to the

1 Community Action Agencies serving all fifty-five  
2 counties in West Virginia.

3 Agency information and funding amounts, including  
4 those funds allocated to service McDowell County can be  
5 found in an attachment, referenced in the Annual File  
6 plan. Based on these funding figures, it is projected  
7 that approximately 443 dwelling units will be  
8 weatherized with the use of DOE funds during program  
9 year 2018. The West Virginia WAP will give priority to  
10 identifying and providing weatherization assistance to  
11 elderly persons (those 60 years of age or older),  
12 persons with disabilities, and households with children  
13 (18 years of age or younger). Priority can also be  
14 given to households with a high energy burden, which has  
15 two components of its definition in the WV WAP; Clients  
16 can be considered high energy burden if:

17 (a.) 20 percent or more of the household income  
18 is utilized to pay for energy usage and/or;

19 (b.) Clients are eligible for the Energy Crisis  
20 Intervention Program (known as ECIP), a component of the  
21 Low-Income Home Energy Assistance Program funding the WV  
22 WAP receives from the WV Department of Health and Human  
23 Resources (DHHR) that supplements the WV WAP.

24 Priority can also be given to clients considered

1 high energy users. Clients will be considered high  
2 energy users if \$2,100 or more is expended by the client  
3 on residential energy annually.

4 All of these priorities are weighted the same with  
5 regards to the points they receive except for ECIP  
6 eligibility allowing for comprehensive weatherization  
7 services to be provided within a reasonable amount of  
8 time from when the client received ECIP services,  
9 increasing the efficiency and cohesiveness between the  
10 programs.

11 Another factor considered when prioritizing  
12 clients in order to have a reasonable and equitable  
13 system is the time spent on the waitlist; however  
14 clients only receive 1 point per year and therefore it  
15 will be ensured that time on the waitlist does not  
16 outweigh other factors within the prioritization system  
17 as per DOE instruction.

18 The WV WAP has also incorporated some priority  
19 features to enhance the DOE required priority eligible  
20 population categories and allow for reasonable,  
21 efficient, and effective implementation of the WAP.  
22 Such prioritization features allow for services in  
23 consideration of timing of services provided by other  
24 funding sources. These additional features include



1 priority given to clients that qualify for utility  
2 funded programs in order to blend the programs and  
3 expend funds properly and clients living in a multi-  
4 dwelling building so the project can be completed.

5 WVDO has developed a point system to rank clients  
6 using the prioritization criteria in the data management  
7 system that tracks all clients, dwellings, and  
8 weatherization work. In this way, DOE mandated target  
9 populations can be prioritized to receive services.  
10 WVDO may modify the prioritization system throughout the  
11 program year within the parameters of the program. The  
12 intent will be to conserve the maximum amount of energy  
13 possible while serving the needs of the state. By  
14 utilizing the data management point system, clients can  
15 be served in a more efficient manner.

16 Are there any questions?

17 Then I'll continue.

18 WV WAP plans to continue to actively pursue non-  
19 Federal resources to supplement the Program through the  
20 development of leveraging projects and partnerships.  
21 The WV WAP expects much greater than the DOE-expected  
22 dollar return for every dollar invested in leveraging  
23 project activity. Weatherization leveraging activities  
24 in WV WAP since 2002 have consistently and successfully

1 produced a greater number of dollars leveraged than  
2 expended every year on leveraging activities.

3 WVDO has a staff member that will oversee  
4 leveraging activities. For PY 2018-2019, WVDO plans to  
5 utilize \$1,000 of the annual Training and Technical  
6 Assistance DOE allocation for leveraging activities.

7 It is anticipated that continued leveraging  
8 activities will enable the WV WAP to enhance and expand  
9 comprehensive low-income weatherization services and be  
10 viewed as a leader in energy conservation technology and  
11 a viable partner in conservation projects.

12 It is a goal of the WV WAP to continue to  
13 aggressively pursue all funding possible to support and  
14 build upon the weatherization program in the state of  
15 West Virginia. This pursuit may include but not be  
16 limited to grants, foundation funds, and other non-  
17 federal partnerships.

18 I will now discuss current leveraged funding or  
19 programs. The weatherization program will continue to  
20 utilize Low-Income Home Energy Assistance Program or  
21 LIHEAP funds from the West Virginia Department of Health  
22 and Human Resources (DHHR) in the operation of the  
23 program. WVDO has worked with WV DHHR to identify  
24 allowable measures and costs that could be supported by

1 LIHEAP funding outside of DOE regulations and  
2 requirements. WVDO worked with DHHR to construct the  
3 LIHEAP agreement to provide more flexibility within the  
4 program and the ability to address issues that may not  
5 be able to be addressed with DOE funding due to certain  
6 restrictions.

7 Currently, the most notable exceptions of LIHEAP  
8 funding are the three Supplemental Components:  
9 Electrical Upgrade, weatherization Related Home Repair,  
10 and the Energy Crisis Intervention Program (ECIP) which  
11 historically have been approved measures of the WV DHHR  
12 Grant Agreement with WVDO. DHHR has also approved  
13 additional funds for Health and Safety measures through  
14 LIHEAP funding to keep the WV WAP Network in compliance  
15 with the 15% threshold for Health and Safety with DOE  
16 funds.

17 Through participation of rate-case energy advocacy  
18 intervention activity at the Public Service Commission  
19 of West Virginia, the West Virginia Community Action  
20 Partnership worked to advocate for utility  
21 weatherization leveraging partnership initiatives.

22 Thanks to these efforts, WVDO and the  
23 weatherization program continue to partner with utility  
24 companies in West Virginia to supplement and expand the



1 weatherization program. For Program Year 2018, the  
2 weatherization program will have several utility  
3 programs running concurrently: Dominion Hope Gas, will  
4 continue to provide \$100,000 per year until the  
5 Company's next rate case; AEP, doing business as  
6 Appalachian Power Company and Wheeling Power Company  
7 typically provides approximately \$500,000 for the  
8 program, but the program will likely receive a  
9 significant increase for 2018 with an allocation just  
10 under \$900,000. with anticipated additional funding for  
11 2018, for the APCO Low Income Weatherization Demand Side  
12 Management Program, which has been extended.

13 The utility company First Energy Corporation,  
14 doing business as Mon Power Company and Potomac Edison  
15 Company, will continue to have a commitment for an  
16 Energy Efficiency Program of around \$100,000 for program  
17 year 2018. Another program called TRAILCo, which stands  
18 for the Trans-Allegheny Interstate Line Company,  
19 Electric Efficiency Partnership, will continue in 2018.  
20 During PY 2018-2019 the WV WAP will continue to spend  
21 carry-over funds from previous years. \$500,000 would be  
22 available this year from the TRAILCo Program. The last  
23 First Energy program is called the Low-Income Checkup  
24 Audit Program, or LICUAP, which was approved for five

1 years for a total of \$2,785,919. The original program  
2 has ended and a new program is currently in the approval  
3 process. The funding amounts are still being determined  
4 as of this date.

5 Any questions or comments on anything I have  
6 covered so far?

7 Then I'll continue.

8 The primary goal for the weatherization program is  
9 to implement cost-effective weatherization procedures to  
10 conserve energy and to assess and correct related health  
11 and safety hazards for the well-being of clients, their  
12 dwellings and weatherization personnel. With more  
13 advanced diagnostics and installation techniques  
14 utilized in the WV WAP, it is increasingly necessary to  
15 take steps to ensure that program measures do not cause  
16 or exacerbate health and safety problems for workers or  
17 clients. Each home weatherized will be individually  
18 assessed to determine the existence of potential hazards  
19 to weatherization personnel or clients. The  
20 weatherization program this year will continue to  
21 incorporate a DOE mandated Health and Safety Plan into  
22 our program.

23 When conditions within the home are such that the  
24 health and safety of the client, crew, or subcontractor



1 will be jeopardized prior to providing assistance,  
2 weatherization must not proceed until such problems are  
3 remedied. In some cases, mitigation of problems may be  
4 beyond the scope of the weatherization program. In  
5 these instances, the client must be notified in writing  
6 and referred to alternative resources for resolution of  
7 the problem.

8 In those instances where the existing conditions  
9 are perceived to pose a threat to the crew or  
10 contractor's health and safety, the WV WAP allows for  
11 deferral of weatherization work until the identified  
12 condition is made acceptable.

13 The WV WAP will budget Health and Safety in a  
14 separate category and there by exclude such costs from  
15 the DOE allowable maximum average per unit cost for this  
16 year, which is \$7,261. For the 2018 - 2019 Program  
17 Year, West Virginia is requesting to utilize up to 15%  
18 of the Program Operation funds for Health and Safety  
19 expenditures. This separate category will also allow  
20 these costs to be isolated from energy efficiency costs  
21 in program evaluation. WV WAP will use its data  
22 management system to implement a limit on Health and  
23 Safety costs charged to DOE on a per job basis. Any  
24 health and safety costs over 15% will be charged to

1 LIHEAP funding, as approved by the West Virginia DHHR,  
2 the LIHEAP Grantee.

3 The WV WAP has developed a spreadsheet as an  
4 attachment to the Plan identifying allowable measures to  
5 be installed under health and safety and also providing  
6 guidance as to when materials/measures can be classified  
7 as energy efficiency measures, incidental repairs, or  
8 ancillary measures to weatherization measures.

9 Any questions on anything I've covered so far?

10 I'll now continue with the Training and Technical  
11 Assistance and Monitoring plan.

12 Training and Technical Assistance activities are  
13 intended to maintain or increase the efficiency, quality  
14 and effectiveness of the weatherization program at all  
15 levels. Activities are designed to maximize energy  
16 savings, minimize production costs, improve program  
17 management and field "quality of work," and/or reduce  
18 the potential for waste, fraud, abuse, and  
19 mismanagement. The state assesses training needs  
20 regularly as part of a constant process as the Program  
21 Year progresses. This process and the related training  
22 plan are flexible and WVDO incorporates information from  
23 the process into the training plan as needed. WVDO  
24 assesses the training needs of its subrecipients through

1 monitoring, grant application responses, trend analysis,  
2 Biannual Training Needs Assessment Surveys,  
3 communication with national experts, the West Virginia  
4 DOE Project Officer, DOE contracted representatives, the  
5 Office of Inspector General, and guidance as provided by  
6 the US Department of Energy.

7 WAP trainings and certifications have been and  
8 will continue to be provided by Interstate Renewable  
9 Energy Council or IREC accredited and certified  
10 weatherization Training Centers within close proximity  
11 to West Virginia.

12 The major areas of focus this 2018 - 2019 for  
13 training are: WV WAP Standard Work Specifications (WV  
14 WAP SWS) functioning as the West Virginia Weatherization  
15 Standards/Field Guide update training; updated ASHRAE  
16 rule 62.2 2016, Energy Auditor certifications network  
17 wide, Continuing Education Credits (CEUs) necessary for  
18 certain re-certifications including Healthy Homes  
19 Specialist and HEP certifications, and the continued re-  
20 certification of Energy Educators and Quality Control  
21 Inspectors. Additional training consisting of New Hire  
22 Requirements, HVAC certification, and Weatherization  
23 Assistant will also be made available.

24 WVDO will also continue to offer HEP Energy



1 Auditor (EA) training and certification as funding  
2 allows, as well as additional HEP Quality Control  
3 Inspector (QCI) training and certifications as necessary  
4 for more efficient and effective implementation of the  
5 WV WAP on the subrecipient level.

6 WVDO will work with subrecipients to fit trainings  
7 into their production schedules. WVDO also tracks all  
8 required licenses needed by subrecipients to properly  
9 perform work within the WV WAP including WV HVAC  
10 Electrician License, WV Single Family Dwelling  
11 Electrician License, EPA Section 608 Refrigerant  
12 Transition Technician Certification, and HVAC Contractor  
13 License and WVDO will ensure all subrecipients remain  
14 current with all WV WAP required licenses.

15 WVDO places great emphasis on maintaining  
16 workforce credentials for both Grantee and subrecipient  
17 staff and build upon such credentials. Credentials,  
18 certifications, and certificates are all tracked for  
19 Grantee and subrecipient staff in the database  
20 management system.

21 Credentials, certifications, and certificates are  
22 reviewed and training, continuing education, and re-  
23 testing is planned and performed as necessary to ensure  
24 Grantee and subrecipient staffs maintain all necessary

1 credentials. This process will also ensure that all  
2 subrecipient certified staff achieve the proper skill  
3 levels to meet the core competencies recommended for  
4 each position.

5  
6 Are there any comments or questions on anything  
7 covered so far?

8 Then I'll continue with Monitoring.

9 Monitoring is one of the most significant and  
10 intricate procedures undertaken by WVDO. WVDO must  
11 adhere to multiple funding bodies' guidelines as well as  
12 construct and adhere to state-specific guidelines and  
13 protocols structured in a way to facilitate successful  
14 and functional program management throughout the state  
15 of West Virginia. Monitoring is a systematic process of  
16 gathering and evaluating information, as well the  
17 physical visitation of sites, in order to support and  
18 assess the subrecipients and their programs in terms of  
19 performance, capacity, and compliance.

20 As a pass through entity of federal dollars, WVDO  
21 ensures that grant funds are expended in accordance with  
22 applicable law, including regulations contained in 10  
23 CFR part 440; 2 CFR 200, 45 CFR Part 75, DOE  
24 Weatherization Program Notices, and other policies and

1 procedures that DOE may issue.

2 WVDO will conduct a monitoring of each  
3 subrecipient at least once a year, provide a written  
4 report to the subrecipient within 30 days of the  
5 monitoring, and maintain both electronic and physical  
6 files related to monitoring which are accessible to DOE  
7 during its monitoring visits.

8 WVDO will also conduct quarterly off-site, desk-  
9 top monitoring utilizing the database management system  
10 used to track all weatherization work, at times coupled  
11 with the statistical management tool and related  
12 analytical spreadsheets used to track production,  
13 expenditures, and other performance indicators. This  
14 process will serve as a pre-monitoring activity as well  
15 as routine review and oversight as needed.

16 The desk-top monitoring activity is utilized to  
17 confirm that measures are performed and tracked  
18 according to program standards, and that diagnostic and  
19 health and safety tests are performed and documented  
20 correctly. It is also used to ensure all documentation  
21 for a client and dwelling are maintained and completed  
22 properly and accurately. This process allows for the  
23 identification of trends that may convey a training  
24 need, or specific jobs that may need to be monitored due



1 to documentation of measures.

2 The monitoring performed by WVDO will be broken  
3 down into three components which may be performed at  
4 different times if necessary and may have differing  
5 frequency depending on quality of subrecipient  
6 performance in each focus area. The three focus areas  
7 are: Programmatic and Management Monitoring; Field or  
8 Technical Monitoring; and Fiscal Monitoring. WVDO will  
9 monitor a sample of completed subrecipient weatherized  
10 dwellings during field monitoring visits. This sample  
11 will either be at least 5% of completions or at least  
12 10% of completions as required by DOE, depending on the  
13 segregation of energy auditing and quality control  
14 inspecting duties within the structure of a  
15 subrecipients weatherization crew.

16 Our training and technical assistance plan,  
17 projects, and monitoring procedures are explained in  
18 greater detail in the state plan.

19 Are there any comments or questions on anything  
20 covered so far?

21 Then I'll continue.

22 As noted in DOE Weatherization Program Notice 10-  
23 12, DOE in coordination with the Advisory Council on  
24 Historic Preservation (ACHP) and the National Conference

1 of State Historic Preservation Officers (NCSHPO), has  
2 developed a Prototype Programmatic Agreement (PA) to  
3 address historic preservation requirements for the WAP.  
4 The WV WAP is evaluating all National Historic  
5 Preservation Act (NHPA) Section 106 reviews utilizing  
6 guidelines set forth in a Letter of Understanding with  
7 the WV Division of Culture and History State Historic  
8 Preservation Office (SHPO). All measures that fall  
9 outside the weatherization Assistance Program exempt  
10 from NHPA Section 106 review are being approved by WV  
11 SHPO. WVDO has two staff members dedicated to Historic  
12 Preservation review, approval, and guidance for WV WAP  
13 subrecipients.

14 WVDO is currently working under a three-year  
15 Letter of Understanding which runs from April 2017  
16 through March 31, 2020. By working in conjunction with  
17 our State Historic Office, this not only builds a strong  
18 partnership that is advantageous to our respective  
19 organizations but also to the West Virginia families  
20 that we serve.

21 In the event of a declared Federal or State  
22 disaster, DOE has allowed for expenditures under the  
23 weatherization program. Weatherization crews may return  
24 to a unit reported as a completion to DOE that has been



1 "damaged by fire, or act of God to be reweatherized",  
2 without regard to date of weatherization." Local  
3 authorities must deem the dwelling units salvageable as  
4 well as habitable and if the damage to the materials is  
5 not covered by insurance or other form of compensation.

6 Another aspect of the weatherization program is  
7 Renewable Energy Systems. Assistance under the WAP may  
8 be provided for renewable energy systems measures with a  
9 SIR greater than 1. 10 CFR Part 440.18(b) and (c) , the  
10 expenditure of financial assistance provided under WAP  
11 incorporates the renewable energy system provisions and  
12 specifies a ceiling of \$3,623 per dwelling for labor,  
13 weatherization materials, and related matters. Because  
14 the total average cost per unit exceeds the renewable  
15 measures allowance, the major effects of the regulation  
16 are to provide criteria and a procedure for integrating  
17 renewables into the WAP, and to establish a process for  
18 evaluating petitions to use new or innovative renewable  
19 energy systems in the WAP.

20 Any renewable energy system measures implemented  
21 by a subrecipient must have WVDO written approval prior  
22 to work being performed.

23 I have now concluded my formal presentation. Are  
24 there any questions or comments on either the last part

1 of my presentation or any other part of the presentation  
2 as well?

3 If there are no more comments,  
4 The hearing is adjourned.

5 \* \* \* \* \*

6 *(CONCLUDED AT 10:33 A.M.)*

7 \* \* \* \* \*

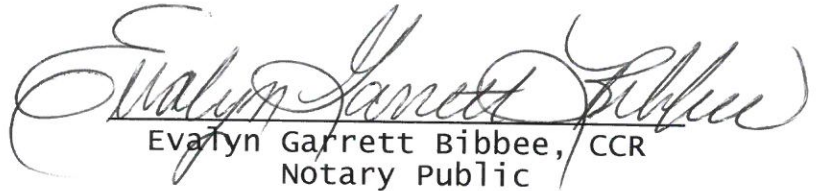
## REPORTER'S CERTIFICATE

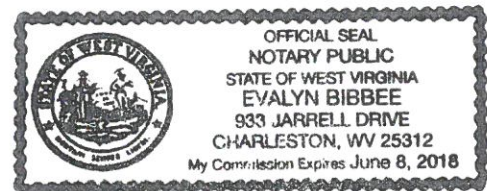
STATE OF WEST VIRGINIA,  
COUNTY OF KANAWHA, to wit:

I, Evalyn Garrett Bibbee, Certified Court Reporter, do hereby certify that the foregoing is a correct verbatim record of the proceedings held at the time and place set forth herein.

I certify that the transcript meets the requirements set forth within Article 27, Chapter 47 of the West Virginia Code.

Given under my hand this 26th day of April, 2018.

  
Evalyn Garrett Bibbee, CCR  
Notary Public



My commission expires June 8, 2018.





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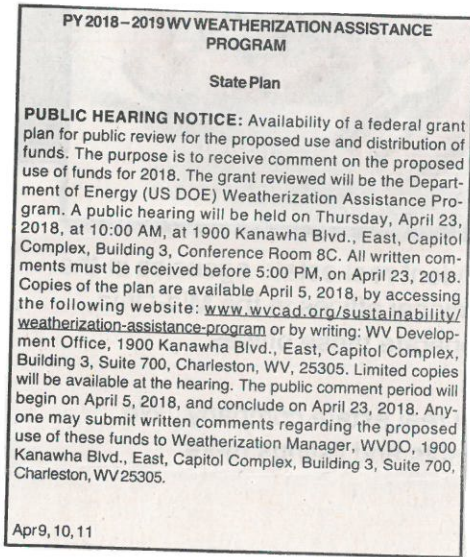
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**No: 141425**

Phone: 304 558-2234

Ad No <b>141425</b>	Customer No: <b>L00914</b>	Start Date <b>04-09-2018</b>	Stop Date <b>04-11-2018</b>	Category: <b>Legals</b>		Classification: <b>Legals</b>			
Order No	Rate: <b>LE</b>	Lines: <b>29</b>	Words: <b>190</b>	Inches: <b>2.88</b>	Cost <b>97.00</b>	Payments <b>.00</b>	Balance <b>97.00</b>		
Publications ... Runs News Legals ... 3		Solicitor: <b>MB</b>	Origin: <b>10</b>	Sales Rep: <b>114</b>	Credit Card	Credit Card Number	Card Expire		
		<table border="1"> <tr> <td>Identifier</td> </tr> <tr> <td>PY 2018 - 2019 WV WEATHERIZATION ASSISTANCE PROGRAM</td> </tr> <tr> <td>State Plan</td> </tr> <tr> <td>PUBLIC HEARING NOTICE:</td> </tr> </table> <p style="color: red; font-size: 2em; margin-left: 200px;"><i>FEIN</i> <i>721526247</i></p>						Identifier	PY 2018 - 2019 WV WEATHERIZATION ASSISTANCE PROGRAM
Identifier									
PY 2018 - 2019 WV WEATHERIZATION ASSISTANCE PROGRAM									
State Plan									
PUBLIC HEARING NOTICE:									
<p>*=Extend Expiration Date</p>									

Legal Affidavit – Mary Buck 304-485-1891 Ext 301



.....MARY J BUCK.....

Being first duly sworn, says that the

“PY 2018-2019 WV WEATHERIZATION ASSISTANCE PROGRAM”.....

Hereto attached was printed in the

..XX...The Parkersburg News and Sentinel,

A daily newspaper published in the City of Parkersburg, Wood County, West Virginia, for ..... THREE..... successive

Day(s), the first publication and posting thereon being on

the .....9TH.....day of ...APRIL..... 2018., and

subsequent publication on the ...10TH...11TH.....

day (s) ...APRIL..... 2018....

Printer’s Fee \$...94.25...

Notarized Signature \$....2.00....

Additional Copy Fee \$.....75...

Total Due: \$...97.00...

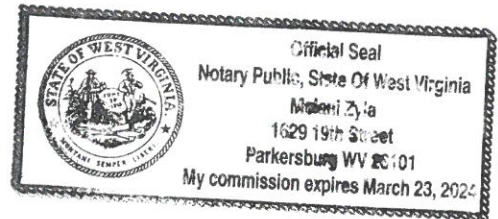
By: *Mary J Buck*

Subscribed and sworn to before me this

*11th* day of *April* 20*18*.

*Melani Zyla*  
Notary Public for Wood County, West Virginia

My commission expires .....*3-23-24*.....



RECEIVED

APR 13 2018

# BECKLEY NEWSPAPERS

801 North Kanawha Street, Beckley, WV 25801

www.register-herald.com

Phone: 304-255-4400 • Toll Free: 800-950-0250 • Fax: 304-255-4427

WV DEVELOPMENT OFFICE

## Receipt

DATE 04/09/18

**Client:**

WV DEVELOPMENT OFFICE  
BUILDING 3, SUITE 700  
CHARLESTON, WV 25305-0000  
(304) 558-0078

ACCOUNT NUMBER: 106461  
ACCOUNT REPRESENTATIVE: BECKLEY LEGALS  
ACCOUNT REP PHONE:  
ACCOUNT REP EMAIL:

*attn: Joyce Sumner*

**Ad ID:** 67694  
**Run Dates:** 04/09/18 to 04/11/18  
**Ad Class:** Legals  
**Total Insertions:** 6  
**Total # of Lines:** 45  
**Total Cost:** \$100.72  
**AdTaker:** Tara Meyer

**Publications:**

Register-Herald  
register-herald.com

**Payments:**

Date	Method	Card Type	Last 4 Digits	Check	Amount

**NOTES:**

Any concerns with price or errors in this receipt please email me at:

SUBTOTAL	\$100.72
TAX	\$0.00
PAYMENT	\$0.00

**AMOUNT DUE \$100.72**

# BECKLEY NEWSPAPERS

801 North Kanawha Street, Beckley, WV 25801

www.register-herald.com

Phone: 304-255-4400 • Toll Free: 800-950-0250 • Fax: 304-255-4427

## Affidavit of Publication

### STATE OF WEST VIRGINIA COUNTY OF RALEIGH,

I, Tara Meyer, of The Register-Herald, a daily newspaper published in the City of Beckley, Raleigh, West Virginia, do certify that the notice attached hereto under the caption;

was published in the said The Register-Herald 3 time(s) on the following day(s), namely 04/09/18, 04/10/18, 04/11/18

Publication Fee: \$100.72

Signed: \_\_\_\_\_

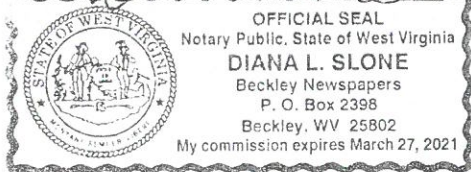
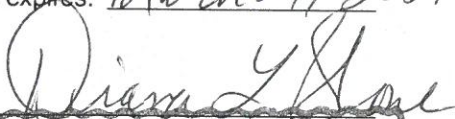


Subscribed and sworn to before me this day  
04/11/2018

My commission expires: \_\_\_\_\_

*March 27, 2021*

Notary Public: \_\_\_\_\_



#### PY 2018 - 2019 WV WEATHERIZATION ASSISTANCE PROGRAM State Plan

**PUBLIC HEARING NOTICE:**  
Availability of a federal grant plan for public review for the proposed use and distribution of funds. The purpose is to receive comment on the proposed use of funds for 2018. The grant reviewed will be the Department of Energy (US DOE) Weatherization Assistance Program. A public hearing will be held on Thursday, April 23, 2018, at 10:00 a.m., at 1900 Kanawha Boulevard East, Capitol Complex, Building 3, Conference Room 8C. All written comments must be received before 5:00 p.m., on April 23, 2018. Copies of the plan are available April 5, 2018, by accessing the following website: [www.wvcad.org/sustainability/weatherization-assistance-program](http://www.wvcad.org/sustainability/weatherization-assistance-program) or by writing: West Virginia Development Office, 1900 Kanawha Boulevard East, Capitol Complex, Building 3, Suite 700, Charleston, WV 25305. Limited copies will be available at the hearing. The public comment period will begin on April 5, 2018, and conclude on April 23, 2018. Anyone may submit written comments regarding the proposed use of these funds to Weatherization Manager, WVDO, 1900 Kanawha Boulevard East, Capitol Complex, Building 3, Suite 700, Charleston, WV 25305.  
4-11-WED-1-RH; LG





RECEIVED

APR 19 2018

WV DEVELOPMENT OFFICE

Invoice

WV NEWSPAPER PUBLISHING CO.  
1251 EARL L CORE RD  
MORGANTOWN, WV 26505  
(304) 292-6301 • FEIN 55-0307305

WV DEVELOPMENT OFFICE-ADM SERVICES/FINANCE DIV.  
ATTN: *Joyce Tuemler*  
1900 KANAWHA BLVD E  
BLDG 3 STE *700*  
CHARLESTON WV 25305-0311

Account - 1013051  
Invoice - 1042018  
Invoice Date - 04/14/18  
Payment Terms - Net 30 Days

DATE	REFERENCE	DESCRIPTION / OTHER COMMENTS	INCHES	LINES	INSERTIONS	AMOUNT
04/14/18	010130015	Dominion Post: Classifieds 010130015 April 12,13,14 PY 2018 – 2019 WV WEATHERIZATION AS 101 Legals	4.7167		3	79.63
Amount Due (\$)						79.63

PHONE INQUIRIES: (304) 292-6301

REMITTANCE ADVICE PLEASE RETURN WITH PAYMENT

WEST VIRGINIA NEWSPAPER PUBLISHING COMPANY  
1251 Earl L. Core Road • Morgantown, WV 26505  
FEIN: 55-0307305

ACCOUNT	INVOICE #	TRANS DATE	AMOUNT DUE	REMITTED
1013051	1042018	04/14/18	79.63	\$
WV DEVELOPMENT OFFICE-ADM SERVICES/FINANCE DIV. ATTN: <i>Joyce Tuemler</i> 1900 KANAWHA BLVD E BLDG 3 STE <i>700</i>		CREDIT CARD #		
		EXP DATE		
		SECURITY CODE		
		CHECK NUMBER		
		SIGNATURE		

RECEIVED

APR 19 2018

WV DEVELOPMENT OFFICE

PUBLISHER'S CERTIFICATE

vs.

STATE OF WEST VIRGINIA
COUNTY OF MONONGALIA

I Brad Pennington Advertising Director of
THE DOMINION POST, a newspaper of general circulation
published in the City of Morgantown, County and State
aforesaid, do hereby certify that the annexed

Legal Notice

was published in the said THE DOMINION POST once a week

for 3 successive weeks commencing on the

12th day of April, 2018 and ending on the

14th day of April, 2018

The publisher's fee for said publication is \$79.63

Given under my hand this 16th day of

April, 2018

Handwritten signature of Brad Pennington

(SEAL)

Advertising Director of THE DOMINION POST

Subscribed and sworn to before me this 16th

day of April, 2018

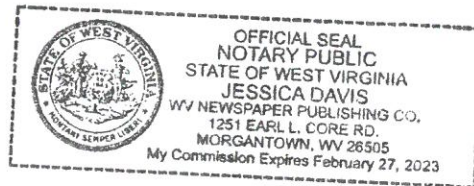
Handwritten signature of Jessica Davis

Notary Public of Monongalia County, W. Va.

My commission expires on the 27th day of

February 2023

010130015 April 12,13,14
PY 2018 - 2019 WV WEATHERIZATION
ASSISTANCE PROGRAM
State Plan
PUBLIC HEARING NOTICE: Availability of a federal
grant plan for public review for the proposed use
and distribution of funds. The purpose is to receive
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5, 2018, by accessing the following website: or by
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East, Capitol Complex, Building 3, Suite 700, Charles-
ton, WV, 25305. Limited copies will be available at the
hearing. The public comment period will begin on April
5, 2018, and conclude on April 23, 2018. Anyone
may submit written comments regarding the proposed
use of these funds to Weatherization Manager, WVDO,
1900 Kanawha Blvd., East, Capitol Complex, Building
3, Suite 700, Charleston, WV 25305.



**Classified/Legal Advertising Invoice  
Intelligencer & News-Register Legals**

1500 Main St

Wheeling, WV  
26003  
(304) 233-0100

**RECEIVED**

APR 19 2018

WV DEVELOPMENT OFFICE

**WV DEVELOPMENT OFFICE-CAD  
1900 KANAWHA BOULEVARD EAST  
BUILDING 3, ROOM 700  
CHARLESTON, WV**

04/03/2018 3:17:58PM

**25305**

**No: 237453**

**Phone: 304 558-2234**

Ad No <b>237453</b>	Customer No: <b>L30713</b>	Start Date <b>04-09-2018</b>	Stop Date <b>04-11-2018</b>	Category: <b>Announcements</b>		Classification: <b>Legal Notices</b>			
Order No	Rate: <b>L</b>	Lines: <b>57</b>	Words: <b>195</b>	Inches: <b>5.54</b>	Cost <b>77.02</b>	Payments <b>.00</b>	Balance <b>77.02</b>		
Publications ... Runs <b>Intelligencer-Legals ... 3 WV Online Legals ... 3</b>		Solicitor: <b>LE</b>	Origin: <b>1</b>	Sales Rep: <b>0</b>	Credit Card	Credit Card Number	Card Expire		
<table border="1" style="width: 100%;"> <tr> <td align="center">Identifier</td> </tr> <tr> <td>                     PUBLIC NOTICE                      PY 2018 – 2019 WV                      WEATHERIZATION                      ASSISTANCE                      PROGRAM State Plan                       PUBLIC HEARING                      NOTICE                 </td> </tr> </table>								Identifier	PUBLIC NOTICE PY 2018 – 2019 WV WEATHERIZATION ASSISTANCE PROGRAM State Plan  PUBLIC HEARING NOTICE
Identifier									
PUBLIC NOTICE PY 2018 – 2019 WV WEATHERIZATION ASSISTANCE PROGRAM State Plan  PUBLIC HEARING NOTICE									
*=Extend Expiration Date									



RECEIVED

APR 19 2018

STATE OF WEST VIRGINIA,  
COUNTY OF OHIO.

WV DEVELOPMENT OFFICE

Sharon Sadlowski for the publisher  
of the *Intelligencer* newspaper published in the CITY OF  
WHEELING, STATE OF WEST VIRGINIA, hereby  
certify that the annexed publication was inserted in said  
newspaper on the following dates:

April 9, 10, 11, 2018

Given under my hand this 13th  
day of April, 2018

Sworn to and subscribed before me this 13<sup>th</sup>  
day of April 2018 at WHEELING,  
OHIO COUNTY, WEST VIRGINIA

Kathy Dayton  
Notary Public

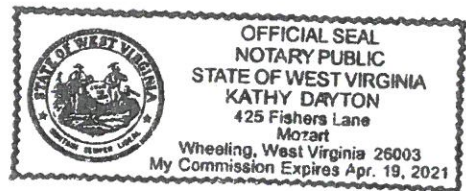
of, in and for OHIO COUNTY, WEST VIRGINIA.

My Commission expires April 19, 2021

**PUBLIC NOTICE**  
PY 2018 - 2019 WV  
WEATHERIZATION  
ASSISTANCE  
PROGRAM State Plan

**PUBLIC HEARING  
NOTICE**

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or by writing: WV Development Office, 1900 Kanawha Blvd., East, Capitol Complex, Building 3, Suite 700, Charleston, WV, 25305. Limited copies will be available at the hearing. The public comment period will begin on April 5, 2018, and conclude on April 23, 2018. Anyone may submit written comments regarding the proposed use of these funds to Weatherization Manager, WVDO, 1900 Kanawha Blvd., East, Capitol Complex, Building 3, Suite 700, Charleston, WV 25305.  
Int. April 9, 10, 11, 2018



# BLUEFIELD DAILY TELEGRAPH

928 Bluefield Avenue, Bluefield, WV 24701  
www.bdtonline.com Phone: 304-327-2801 • Toll Free: 800-763-2459 • Fax: 304-327-0433

RECEIVED

APR 23 2018

WV DEVELOPMENT OFFICE

## Invoice

DATE 04/19/18

**Client:**

WV OFFICE OF ECONOMIC  
OPPORTUNITY  
1900 KANWHA E BLVD STE 800  
CHARLESTON, WV 25305-0000  
(304) 558-2234

ACCOUNT NUMBER: 107542

COPY

**Ad ID:** 67523

**Ad Description:** PY 2018 2019 WV WEATHERIZATION ASSIS

**Run Dates:** 04/09/18, 04/10/18, 04/11/18

**Total Insertions:** 3

**Total # of Lines:** 39

**Total Cost:** \$84.75

**AdTaker:** Teresa Evans

**Publications:**

Bluefield Daily Telegraph  
bdtonline.com

**Payments:**

Date	Method	Card Type	Last 4 Digits	Check	Amount
------	--------	-----------	---------------	-------	--------

**NOTES:**

Any concerns with price or errors in this receipt please email me at:  
treed@bdtonline.com

SUBTOTAL	\$84.75
TAX	\$0.00
PAYMENT	\$0.00

**AMOUNT DUE \$84.75**

# BLUEFIELD DAILY TELEGRAPH

928 Bluefield Avenue, Bluefield, WV 24701  
Phone: 304-327-2801 Toll Free: 800-763-2459 • Fax: 304-327-0433  
www.bdtonline.com

## Affidavit of Publication STATE OF WEST VIRGINIA COUNTY OF MERCER,

I, Jeremy Basham, of the Bluefield Daily Telegraph, a daily newspaper published in the City of Bluefield, Mercer, West Virginia, do certify that the notice attached hereto under the caption;

was published in the said Bluefield Daily Telegraph 3 time(s) on the following day(s), namely 04/09/18, 04/10/18, 04/11/18

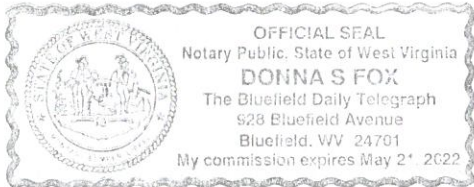
Publication Fee: \$84.75

Signed: 

Subscribed and sworn to before me this day  
04/11/2018

My commission expires: May 21, 2022

Notary Public: 



PY 2018 – 2019 WV  
WEATHERIZATION  
ASSISTANCE PROGRAM  
State Plan

**PUBLIC HEARING NOTICE:** Availability of a federal grant plan for public review for the proposed use and distribution of funds. The purpose is to receive comment on the proposed use of funds for 2018. The grant reviewed will be the Department of Energy (US DOE) Weatherization Assistance Program. A public hearing will be held on Thursday, April 23, 2018, at 10:00 AM, at 1900 Kanawha Blvd., East, Capitol Complex, Building 3, Conference Room 8C. All written comments must be received before 5:00 PM, on April 23, 2018. Copies of the plan are available April 5, 2018, by accessing the following website: [www.wvcad.org/sustainability/weatherization-assistance-program](http://www.wvcad.org/sustainability/weatherization-assistance-program) or by writing: WV Development Office, 1900 Kanawha Blvd., East, Capitol Complex, Building 3, Suite 700, Charleston, WV, 25305. Limited copies will be available at the hearing. The public comment period will begin on April 5, 2018, and conclude on April 23, 2018. Anyone may submit written comments regarding the proposed use of these funds to Weatherization Manager, WVDO, 1900 Kanawha Blvd., East, Capitol Complex, Building 3, Suite 700, Charleston, WV 25305.

**RECEIVED**  
APR 23 2018  
WV DEVELOPMENT OFFICE

Classified/Legal Advertising Invoice

**The Journal**

207 W King St

Martinsburg, WV

25401

(304) 263-8931

**RECEIVED**

APR 30 2018

WV DEVELOPMENT OFFICE

**WV COMMUNITY ADVANCEMENT**  
 1900 KANAWHA BLVD, E.  
 CAPITOL COMPLEX, BLDG. 6, ROOM 553  
 CHARLESTON, WV

25305

04/04/2018 9:08:14AM

Phone: 304 558-2234

**No: 538933**

Ad No <b>538933</b>	Customer No: <b>L43739</b>	Start Date <b>04-09-2018</b>	Stop Date <b>04-11-2018</b>	Category: <b>Legal Notices</b>		Classification: <b>Legals/Public Notice</b>						
Order No	Rate: <b>LE</b>	Lines: <b>60</b>	Words: <b>188</b>	Inches: <b>6.26</b>		Cost <b>94.25</b>	Payments <b>.00</b>	Balance <b>94.25</b>				
Publications ... Runs <b>Journal ... 3</b>		Solicitor: <b>JC</b>	Origin: <b>2</b>	Sales Rep: <b>16</b>	Credit Card	Credit Card Number		Card Expire				
<table border="1" style="width: 100%;"> <tr> <td style="text-align: center;">Identifier</td> </tr> <tr> <td>PY 2018 - 2019 WV WEATHERIZATION ASSISTANCE PROGRAM</td> </tr> <tr> <td>State Plan</td> </tr> <tr> <td>PUBLIC HEARING</td> </tr> </table>									Identifier	PY 2018 - 2019 WV WEATHERIZATION ASSISTANCE PROGRAM	State Plan	PUBLIC HEARING
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State Plan												
PUBLIC HEARING												
<p><b>COPY</b></p>												
<p>*=Extend Expiration Date</p>												



PY 2018 – 2019 WV  
WEATHERIZATION  
ASSISTANCE  
PROGRAM

State Plan

**PUBLIC HEARING  
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or by writing:  
WV Development Office,  
1900 Kanawha Blvd.,  
East, Capitol Complex,  
Building 3, Suite 700,  
Charleston, WV, 25305.  
Limited copies will be available at the hearing. The public comment period will begin on April 5, 2018, and conclude on April 23, 2018. Anyone may submit written comments regarding the proposed use of these funds to Weatherization Manager, WVDO,  
1900 Kanawha Blvd.,  
East, Capitol Complex,  
Building 3, Suite 700,  
Charleston, WV 25305.  
4:9.10.11 (3t)

**Certificate of Publication**

*WV Comm Advancement*

This is to certify the annexed advertisement

*Public Hearing  
Grant Plan*

appeared for 3 consecutive days/weeks  
in The Journal Publishing Company, a news-  
paper in the City of Martinsburg, WV in it's  
issue beginning:

*9 Apr 2018*  
and ending

*11 Apr 2018*

**The Journal**

**207 W. King Street**

**Martinsburg, WV 25401**

Fee (\$) 94.25

THE STATE OF WEST VIRGINIA  
COUNTY OF BERKELEY

The foregoing instrument was acknowledged  
before me this 18 Apr 2018 by

*[Signature]*

My commission expires

*Feb 7, 2021*



OFFICIAL SEAL  
**NOTARY PUBLIC**  
STATE OF WEST VIRGINIA  
Jeri L. Wines  
203 Grove Springs Lane  
Harpers Ferry, WV 25425  
My Commission Expires Feb. 7, 2021



ADNo: 538933 Customer Number: L43739  
 Customer Name: MARK ADAMS Company: WV COMMUNITY ADVANCE  
 Address: 1900 KANAWHA BLVD, E CAPITOL COMPLEX, BLD  
 City/St/Zip: CHARLESTON ,WV 25305  
 Phone: (304) 558-2234 Solicitor: JC  
 Category: 70 Class: 110 Rate: LE-0 Start: 4-9-2018 Stop: 4-11-2018  
 Lines: 60 Inches: 6.26 Words: 188

Credit Card: Expire:  
 Order Number:  
 Cost: 94.25 Adjustments: .00  
 Payments: .00 Discount: .00  
 Balance: 94.25

**PY 2018 – 2019 WV  
 WEATHERIZATION  
 ASSISTANCE  
 PROGRAM**

**State Plan**

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 Charleston, WV 25305.

4:9,10,11 (3t)

## **PY 2018 – 2019 WV WEATHERIZATION ASSISTANCE PROGRAM**

### **State Plan**

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**West Virginia**  
**Weatherization Assistance Program**

Policy Advisory Council Meeting

March 15, 2018

WV Development Office

Charleston, WV

**AGENDA**

- Updates for the Policy Advisory Council:
  - DOE Monitoring of WV WAP – November 2017
  - Weatherization Tract @ WVCAP Conference – April
  
- Updates – Department of Energy
  - Resignation of David Rinebolt – Weatherization Assistant Program Manger
  - Release of WPN 18-1 Weatherization Grant Guidelines
  - WPN 18-2, Program Year 2018 Grantee Allocations
  - New Health & Safety Template
  
- WV Weatherization Assistance Program Improvements
  - New Staff – Field/Technical Specialist
  - Update - WAP Standard Work Specifications (SWS)
  
- Supplemental Funding
  - Low Income Home Energy Assistance Program (LIHEAP) – WV DHHR
  
- Items to be addressed/considered – 2018 - 2019
  - Possible reassignment of one county
  
- Challenges for 2018 - 2019:
  - Subrecipient Input per DOE WAP Memorandum 025
  - Deferral rate
  - Training and Technical Assistance
  
- PY 2017- 2018 WV WAP DOE State Plan
  - Master File
  - Annual File



West Virginia  
**Weatherization Assistance Program**

**Policy Advisory Council Meeting**

March 15, 2018

9:00 AM

WV Development Office

Charleston, WV

**NOTES FROM MEETING:**

- Attendance:
  - Ann McDaniel – West Virginia Statewide Independent Living Council
  - Mary Chipps – West Virginia Community Action Partnership
  - Jacqueline Roberts – West Virginia Public Service Commission
  - Gaylene Miller – West Virginia AARP
  - Tammy Stafford – Appalachian Power
  - Mark Adams – Weatherization Manager  
WV Community Advancement & Development Division (WVCAD)
  - Jennifer Ferrell – Community Sustainability Unit Manager, WVCAD
  
- Updates for the Policy Advisory Council:
  - DOE Monitoring of WV WAP – November 2017
    - Details of the most recent DOE on-site monitoring of the WVVWAP was provided. Members were informed that the weatherization program received a very good report from DOE, with several recommendations and only one (1) finding. The monitoring covered the Field/Technical component which occurred in November 2016, and the Programmatic assessment which occurred November 13-17, 2017. DOE also visited three (3) subrecipients during the 2016 visit including weatherized homes and work in process, and one (1) subrecipient (Programmatic review only) for the 2017 visit.
  
  - Weatherization Tract @ WVCAP Conference
    - The Weatherization Manager asked Ms. Chipps to discuss the 2018 WV CAP Conference scheduled for April 23-25, 2018. Ms. Chipps provided details of the conference including the Weatherization Tract to be presented by the WVVWAP staff. The Weatherization Manager provided the topics to be presented, which includes sessions for Weatherization Coordinators, Quality Control Inspectors, Energy Auditors, and crew technicians. The weatherization manager noted that Community Housing

Partners (CHP) in Christiansburg, VA, has been signed to present on ASHRAE 62.2 2016, but all other sessions would be presented by WVWAP staff.

- Updates – Department of Energy:
  - Resignation of David Rinebolt – DOE Weatherization Assistance Program Manager
    - PAC members were informed that Wx staff learned of Mr. Rinebolt’s resignation and departure from DOE at the 2018 NASCSP Annual Training Conference during the week of February 26 – March 2, 2018. Currently the DOE WAP is being managed by Anna Garcia – Director, Weatherization and Intergovernmental Programs Office, Energy Efficiency and Renewable Energy; Erica Burrin – Managing Team Lead, DOE WAP, and Jim Carlisle – Operations Supervisor, Weatherization and Intergovernmental Program Office. DOE reported the plans for FY 2018 is to appoint a temporary WAP Manager, and that there would be no interruptions in the receipt of grant funds or WAP services.
  - Release of WPN 18-1 – Weatherization Grant Guidelines
    - DOE released Weatherization Program Notice 18-1, Program Year 2018 WAP Grant Guidance on December 18, 2017. At the time of the release, the WAP was (and still is) operating under a Continuing Resolution for Fiscal Year 2018. The WPN instructs Grantees to develop State Plans using the DOE 2016 Appropriated Funds provided in WPN 16-2A, until a final full year FY 2018 budget is passed and signed by the President. For budgeting purposes for the WVWAP this amount is \$2,977,505.
  - WPN 18-2 – Grantee Allocations
    - PAC members were informed that WPN 18-2 – Grantee Allocations had not been released by the U.S. Department of Energy (US DOE) due to no final Federal budget as of the meeting date. Members were told the WAP has excellent support in both the Senate and the House, but that the current Continuing Resolution will expire March 23<sup>rd</sup>.
  - New Health & Safety Template
    - Information on DOE WPN 17-7 Weatherization Health and Safety Guidance – Update was provided, as WVDO will incorporate the new guidance into the PY 2018 State Plan. The weatherization manager reviewed the new template that has been provided by DOE and noted that DOE stressed at the February NASCSP Conference that use of the template would expedite the review process. WVWAP has used the template structure for the current plan but decided against using the actual template because it is an Excel document.

- WV Weatherization Assistance Program Improvements:
  - New Staff – Field/Technical Specialist
    - Jerimiah Ramsey has been hired as a Field Monitor and is currently accompanying the monitors on monitorings as an observer. Mr. Ramsey is in the process of coordinating trainings with Community Housing Partners (CHP). The Weatherization Manager reported that Mr. Ramsey has an extensive background in construction, HVAC, and has a Journeyman’s Electrical License.
  - Update – WAP Standard Work Specifications (SWS):
    - WVDO Field/Technical monitors, are currently updating the Manufactured Housing SWS. Monitors have already updated the Single Family SWS in preparation for submission to DOE for renewal. The members were informed that the current SWSs expire January 7, 2019, and revised/updated versions must be submitted prior to that date for review. The target date for submission to DOE is October 1, 2018.
- Supplemental Funding:
  - Low Income Home Energy Assistance Program (LIHEAP) – WV DHHR
    - WVDO is submitting a waiver to receive additional FY 2018 LIHEAP Wx funds. The amount of additional funds to be requested is \$2,335,537, which will bring the FY 2018 WV DHHR LIHEAP Wx total to \$6,790,464. All funds will be awarded to the Wx subrecipients. WVDO is keeping no funds for Administration or Training and Technical Assistance. The Weatherization Manager stated these funds will be awarded to the eleven subrecipients contracted under the FY 2018 grant. DHHR has approved these funds for use to purchase equipment, vehicles, new hires, and production to decrease time on the Waitlist and increase the number of clients/homes served. The Weatherization Manager is currently working with State DHHR staff to prepare the Public Hearing Notification, material to place on the DHHR website, and Public Hearing script. As of the date of this meeting, the Public Hearing date has not been set, but the goal is to have the hearing no later than the last week of April.
    - NHEP (No Heat Emergency Program) grant: The Weatherization Manager provided an update on the second year of the NHEP and how beneficial the program has been to those individuals that meet the poverty level guidelines. WVDO requested and received \$1,520,213 for FY 2018, and the Weatherization Manager has submitted a request to DHHR for an additional \$700,500 to provide to the subrecipients that have sought additional funds over their initial grant allocation. This will bring the total grant amount to \$2,220,713. WVDO is waiting for approval of the funds, and if approved, grant amendments will be forthcoming. All additional

funds will go to the subrecipients to provide services. WVDO is keeping no funds for Administrative costs.

- Items to be Addressed/Considered – 2018 – 2019:
  - Possible Reassignment of One County
    - The Weatherization Manager discussed the ongoing situation with Council of the Southern Mountains, Inc., and weatherization services for residents of McDowell County. The members were informed that Council of the Southern Mountains (CSM) was no longer providing weatherization services with DHHR LIHEAP Wx grant funds, as the agency did not apply during the initial application process. When WVDO did ask subrecipients to competitively bid on McDowell County, CSM did submit an application, but was not chosen due to a stronger application from PRIDE Community Services. Members were informed that CSM had been monitored twice in 2017, and WVWAP monitors found major areas for concern in regards to work quality and overall management of the WAP. The CSM does have an open DOE grant award (expires June 30, 2018), but has expended all of those funds. The Weatherization Manager detailed how WVDO will determine the WAP service provided for the upcoming 2018 DOE Program Year, which will be included in the Public Hearing. The WVDO will seek competitive grant applications and a thorough review and risk assessment will be conducted, and a determination will be made for the best provider to serve the residents of McDowell County.
  
- Challenges for 2018 – 2019:
  - Subrecipient Input per DOE WAP Memorandum 025
    - Details were provided on the instructions in DOE WAP Memorandum 025 and how the WVWAP is incorporating those instructions into its yearly schedule. To date, four (4) quarterly meetings with subrecipient Executive Directors/CEOs have been scheduled, with the first held in January. The January meeting exclusively covered Memo 025, allowed for input into the 2018 State Plan preparations, and provided an opportunity for EDs/CEOs to express concerns about the upcoming DOE Program Year. Those in attendance did express disappointment that the ACSI survey was sent only to Wx Coordinators, and concern was expressed that regardless of any input they might have, DOE determines the rules and regulations. The Weatherization Manager informed the members this process of seeking input into the State Plan and for continuing to improve communication between WVDO/WVWAP and the subrecipients was a top priority for 2018.



- Deferral Rate
  - Updates to the deferral rate and time on the Waitlist issues were provided, as WVVAP has seen a decrease in both due to the additional DHHR LIHEAP Wx funds received for FY 2017. Although both lists have decreased, subrecipients continue to have to defer many homes beyond the scope of the weatherization program. With the anticipation of more additional DHHR LIHEAP Wx funds this FY, WVVAP is encouraged that both issues continue to decrease as more staff, newer equipment, and better trained crews become available.
  - From the deferral rate/Waitlist discussion, the PAC members asked how clients moved up on the Waitlist and how points were assigned. Members were referred to pages 11-13 of the Master File, which details priority determination. During the discussion, the veteran population was mentioned, and specifically if veterans that met other WAP criteria could receive points. It was suggested that due to the significant need in the state that this be added to the WVVAP priority list. The members were informed that DOE sets the criteria, but that starting the conversation during the application process with the DOE Project Officer would be a good start.
  
- Training and Technical Assistance
  - PAC members were informed that WVVAP is monitoring the changes forthcoming to the Energy Auditor (EA) and Quality Control Inspector (QCI) certifications. WVVAP staff attended a session presented by DOE at the February NASCSP Conference which detailed the changes and the estimated time when the revisions to the certification process would occur. Members were told that the main difference for subrecipient EAs and QCIs is that in order to be a certified QCI, the individual will need to hold an active EA certification. There are some questions in regards to the recertification process, but DOE is not expecting any major issues.
  
- PY 2018 – 2019 WVVAP DOE State Plan:
  - Funding – \$2,977,505
    - Program Allocation: \$2,482,534
    - Training and Technical Assistance: \$494,971
  - Major Components - The full draft state plan was provided. The discussion of the plan occurred throughout the meeting, highlighting challenges and topics mentioned above.
    - Master File
    - Annual File
    - Budget
  - WVDO's plan is to submit the draft State Plan, with any public comments, to the DOE Project Officer in mid-April for review and input.
  - The Public Hearing will be April 23, 2018.

West Virginia Development Office  
Cost Allocation Plan  
April 2018

The West Virginia Development Office (WVDO) allocates all costs, including Administrative costs, as direct costs through the use of multiple codes in the wvOASIS financial system. Generally that allocation is made at the time of payment, particularly if the expenditure was made for a direct program purpose. Costs that are clearly Administrative, and/or combined program and administrative, will be allocated at the time of payment whenever possible. Direct weatherization program costs are generally split between the Weatherization Assistance Program (WAP) and Low-Income Home Energy Assistance Program (LIHEAP) based on the program funding available from each source.

#### Payroll

With the exception of funds passed through to sub-grantees, payroll cost (salaries and benefits) are WVDO's greatest expenses. WVDO's payroll is handled by the Department of Commerce, of which WVDO is one division. Payroll costs are originally paid based on budgeted time, but are adjusted monthly to reflect actual, as worked, time for those staff who split work on multiple programs or whose time is shared between direct program and agency-wide tasks.

A majority of WVDO staff work on a single program and are paid directly from that program funding. Some employees routinely divide their time between multiple programs, including Weatherization, and may also handle some administrative tasks. WVDO also recognizes an Administrative Pool which includes the agency's deputy director, sustainability manager, chief financial officer, accountants, and accounting tech.

All WVDO staff complete a monthly timesheet for the Department of Commerce, which records time worked, leave earned, and leave taken. The employees whose time is divided between multiple programs and/or direct and agency-wide tasks also complete a monthly time and effort report to record actual time worked on each program. This time and effort report is the basis for after-the-fact, "as worked," payroll adjustments.

The WAP does not have sufficient administrative funding to bear that full administrative cost, even shared with the LIHEAP program, so WVDO has chosen to use Community Service Block Grant (CSBG) administrative and General Revenue funds to support the WAP as needed.

#### Travel Costs

In most cases, travel has a direct programmatic purpose and is allocated at the time of payment. Some administrative staff travel/training is for the benefit of the entire agency and will be allocated to multiple funding sources based on the percentage of direct costs (# of direct program employees who attended training) charged to each program.

### Contracts

Contracted services are allocated to programs based on the benefit to the program. A primary annual contract is for the DBA FACS Pro database. The yearly maintenance is shared between Weatherization and CSBG. Program changes and upgrades are paid by the program requesting the change/upgrade. The Homelessness programs do not use DBA FACS Pro.

### Other Costs (Direct and Administrative)

All costs are analyzed to determine if they are direct, administrative or a combination of both. Direct program costs, and the identifiably direct share of common costs, are allocated to the appropriate program. Administrative costs directly related to programs are charged to the respective program. The administrative share of common costs are generally allocated based on the percentage of direct costs (# of direct program employees involved) charged to each program.

### Rent

Rental costs are allocated based both on office size and who is using the space. At the Charleston office, square footage has been determined for each individual office to calculate the direct programmatic cost based on who occupies what space. Common space cost is allocated by the percentage of direct and administrative square footage in the office. The cost of space used by administrative staff and their share of common space costs are allocated based on the percentage of direct program square footage.

### Telecommunications

Basic office telephone costs are allocated as described under Other Costs. Conference calls are almost always identifiable to a particular program and are allocated directly. Cell phones costs are identified with the person using the phone and are allocated as direct or administrative, with the administrative costs allocated as described above in Other Costs.

REC'D APR 27 2017



**The Culture Center**  
1900 Kanawha Blvd., E.  
Charleston, WV 25305-0300

**Randall Reid-Smith, Commissioner**

Phone 304.558.0220 • www.wvculture.org  
Fax 304.558.2779 • TDD 304.558.3562  
EEO/AA Employer

April 25, 2017

Mr. Mark A. Adams  
Weatherization Manager  
West Virginia Office of Economic Opportunity  
Capitol Complex, Building 6, Room 553  
1900 Kanawha Boulevard East  
Charleston, West Virginia 25305-0311

RE: 2017 State Agreement Between WVODO and WVSHPO  
FR# 17-490-Multi-1

Dear Mr. Adams:

We have reviewed the above mentioned project to determine its effects to cultural resources. As required by Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties," we submit our comments.

According to submitted information, the West Virginia Office of Economic Opportunity wishes to renew the State Agreement between our agencies early. WVEO wishes to move the date covered under the agreement from November 30, 2017 forward to April 1, 2017 and each April thereafter. This will coordinate the date with the other WVODO planning and reporting procedures. We are agreeable to the date change.

We have signed the letter and are returning the original copy for your files. We will retain a copy, Exemptions Attachment, Certificates of completion for the ACHP course in 106, and the US Department of Energy Weatherization Program Notice 10-08 for our records.

We appreciate the opportunity to be of service. If you have questions regarding our comments or the Section 106 process, please contact Ernest Blevins, Structural Historian, at (304) 558-0240.

Sincerely,

Susan M. Pierce  
Deputy State Historic Preservation Officer

SMP/EEB

REC'D APR 27 2017



WEST VIRGINIA DEVELOPMENT OFFICE

1900 Kanawha Boulevard East • Charleston, WV 25305-0311  
(304) 558-2234 • (800) 982-3386 • WVDO.org

April 1, 2017

Susan M. Pierce  
Deputy State Historic Preservation Officer  
West Virginia Division of Culture and History  
1900 Kanawha Boulevard East  
Charleston, WV 25305

Dear Ms. Pierce,

In preparation for the 2017 State Plan, I would like to request an early renewal of the Agreement between the WV Development Office (WVDO) and the WV State Historic Preservation Office (WVSHPO). The State Plan is the official application to the U.S. Department of Energy (DOE) for the Weatherization Assistance for Low-Income Persons Grant. The current Agreement expires November 30, 2017. An early renewal (if approved) would negate the need to apply for renewal after the grant start date of July 1, 2017. The current Agreement is for a period of three (3) years, and I would like to request the new Agreement run three (3) years, April 1, 2017, to March 31, 2020.

WVDO is the administering agency of DOE funds for the Weatherization Assistance Program (WAP) in the State of West Virginia. This correspondence is to ensure compliance with the National Historic Preservation Act (NHPA or "the Act"), 54 U.S.C. 300101 et seq., as it relates to DOE WAP Grantees, specifically in the State of West Virginia. It is our opinion that our program will result in numerous projects that do not have the potential to impact historic resources. We request your concurrence with this determination and have attached to this letter a list of the undertakings that we would request to be exempt from Section 106 review by your office. In anticipation of your agreement with these findings, we have taken the liberty to outline what our organization believes to be the roles and responsibilities of the State Historic Preservation Office and the Office of Economic Opportunity.

Specific roles and responsibilities of both parties are as follows:

1. WVDO shall be responsible for conducting Section 106 reviews in a timely manner, preparing documentation, and maintaining records on undertakings. Undertakings that involve properties greater than forty-five (45) years old and are not listed on Appendix A (attached) shall be submitted to the WVSHPO for review.
  - 1.a. In addition to the WV Weatherization Assistance Program Historic Preservation Review Sheet already submitted, WVDO will complete the WVSHPO Historic Property Inventory Form (HPI) to include setting and building descriptions and additional building history the owner may provide. Both will be submitted to WVSHPO.



2. WVDO shall ensure that the provisions of this Agreement apply to its subrecipients.
3. WVDO shall not submit to the WVSHPO undertakings outlined on the attached list as they do not have the potential to cause effects on historic properties even when historic properties may be present.
4. As allowed under Section 106 of the NHPA, the WVSHPO shall provide comments to WVDO within thirty (30) days for reviews. In the event that the WVSHPO fails to comment within the thirty (30) day period, WVDO can assume the WVSHPO has concurred, and proceed.
5. WVDO will advise subrecipients of the provisions in Section 110 (k) of the Act and will advise the subrecipients that Section 106 reviews may be compromised when project undertakings are initiated prematurely.
6. Both parties shall make every effort to expedite Section 106 reviews for a period of less than the 30-day review when consistent with the terms of the DOE grant agreements. WVDO has identified two (2) qualified staff members to review these projects. These qualified persons have attended training regarding the National Register of Historic Places and will be applying the criteria of the National Register. Their certificates are attached. When an emergency, as defined by WVDO, has the potential to impact a building 45 years or older and necessitates a quicker review by the WVSHPO, the WVSHPO will make every reasonable effort to expedite the review. As defined by the WVDO, emergencies exist where there is a need to eliminate an imminent threat to health and safety of residents. It is WVOEO's responsibility to communicate to the WVSHPO the need for an expedited review.
  - a. WVDO shall forward documentation to the WVSHPO for review immediately upon notification that an emergency exists. Documentation should include a) nature of the emergency; b) the address of the historic property involved; c) photographs showing the current condition of the building; and d) the time frame allowed by local or county officials to respond to, or correct, the emergency situation.
  - b. If an emergency undertaking will result in an adverse effect to a historic resource, the WVDO will work with the WVSHPO to avoid, minimize or mitigate the adverse effect.
7. WVDO shall maintain a list of undertakings and shall make documentation available to the public per Department of Energy Weatherization Program Notice 10-08 guidelines. At the end of each reporting year a list of exempted projects will be forwarded to the WVSHPO.
  - a. Public Information to include: City/town, county, date of construction (if not known ca. with an approximate date will be used), if the property is NR listed in a district or individually, and a brief work summary.

- b. WV SHPO information to include: Address, county, date of construction, (if not known ca. with an approximate date will be used), if the property is NR listed in a district or individually, and a brief work summary.
8. WVDO agrees to notify Historic Landmark Commissions when applicable per 36 CFR 800.2(d)(1). Information provided will adhere to DOE WPN 10-8: Weatherization Guidance on Maintaining the Privacy of Recipients of Services. (Attached)

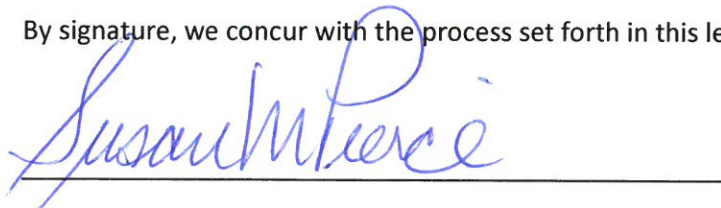
We request that the attached list be exempted from individual review for a period of three (3) years, from April 1, 2017 until March 31, 2020. WVDO and its subrecipients will maintain appropriate documentation of its funded activities should the WVSHPO wish to review the ongoing application of these exemptions. Please provide your comments and concurrence with this proposed list of exemptions.

Respectfully,

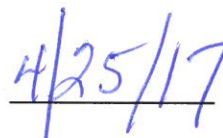


Mark A. Adams  
Weatherization Manager

By signature, we concur with the process set forth in this letter.



Susan M. Pierce, Deputy WVSHPO



Date

## WAP UNDERTAKINGS EXEMPT FROM SECTION 106 REVIEW

All undertakings will be done in accordance with applicable local building codes or the International Building Code, where applicable. In accordance with 36 CFR 800.3(a)(1), the following undertakings have been determined to have no potential to cause effects on historic properties:

### A. Exterior Work

- 1) Air sealing of the building shell, including caulking, weather-stripping, and other air infiltration control measures on windows and doors, and installing thresholds in a manner that does not harm or obscure historic windows or trim;
- 2) Thermal insulation, such as non-toxic fiberglass and foil wrapped, in walls, floors, ceilings, attics, and foundations in a manner that does not harm or damage historic fabric;
- 3) Blown in wall insulation where no holes are drilled through exterior siding, or where holes have no permanent visible alteration to the structure;
- 4) Removable film on windows (if the film is transparent), solar screens, or window louvers, in a manner that does not harm or obscure historic windows or trim;
- 5) Reflective roof coating in a manner that replicates the historic materials and form, or with materials that restore the original feature based on historic evidence, and in a manner that does not alter the roofline, or where not on a primary roof elevation or visible from the public right-of-way; and
- 6) Repair of minor roof and wall leaks prior to insulating attics or walls, provided repairs replicates existing surface composite.

### B. Interior Work

**Special Note:** Undertakings to interior spaces where the work will not be visible from the public right of way; no structural alterations are made; no demolition of walls, ceilings or floors occurs; no drop ceilings are added; or no walls are leveled with furring or moved, should be automatically excluded from **WVSHPO** review. This work includes:

#### **1. Energy efficiency work within the building shell:**

- a. Thermal insulation in walls, floors, ceilings, attics, crawl spaces, ducts and foundations;
- b. Blown in wall insulation where no decorative plaster is damaged;
- c. Plumbing work, including installation of water heaters;
- d. Electrical work, including improving lamp efficiency;
- e. Sealing air leaks using weather stripping, door sweeps, and caulk and sealing major air leaks associated with bypasses, ducts, air conditioning units, etc.;
- f. Repair or replace water heaters;
- g. Adding adjustable speed drives such as fans on air handling units, cooling tower fans, and pumps;
- h. Install insulation on water heater tanks and water heating pipes;
- j. Install waste heat recovery devices, including desuperheater water heaters, condensing heat exchangers, heat pump and water heating heat recovery systems,



- and other energy recovery equipment;
- k. Repair or replace electric motors and motor controls like variable speed drives; and
  - l. Incorporate other lighting technologies such as dimmable ballasts, day lighting controls, and occupant controlled dimming.

**2. Work on heating and cooling systems:**

- a. Clean, tune, repair or replace heating systems, including furnaces, oilers, heat pumps, vented space heaters, and wood stoves. Subrecipient or contractor will use the same foundation pad location as originally used.
- b. Clean, tune repair or replace cooling systems, including central air conditioners, window air conditioners, heat pumps, and evaporative coolers. Subrecipient or contractor will use the same foundation pad location as originally used.
- c. Install insulation on ducts and heating pipes;
- d. Conduct other efficiency improvements on heating and cooling systems, including replacing standing pilot lights with electronic ignition devices and installing vent dampers;
- e. Modify duct and pipe systems so heating and cooling systems operate efficiently and effectively, including adding return ducts, replace diffusers and registers, replace air filters, install thermostatic radiator controls on steam and hot water heating systems; and
- f. Install programmable thermostats, outdoor reset controls, UL listed energy management systems or building automation systems and other HVAC control systems.

**3. Energy efficiency work affecting the electric base load of the property:**

- a. Convert incandescent lighting to fluorescent;
- b. Add reflectors, LED exist signs, efficient HID fixtures, and occupancy (motion) sensors; and
- c. Replace refrigerators and other appliances.

**4. Health and safety measures:**

- a. Installing fire, smoke or carbon dioxide detectors/alarms;
- b. Repair or replace vent systems on fossil-fuel-fired heating systems and water heaters to ensure that combustion gasses draft safely to outside; and
- c. Install mechanical ventilation, in a manner not visible from the public right of way, to ensure adequate indoor air quality if house is air-sealed to building tightness limit.



**Department of Energy**  
Washington, DC 20585

**WEATHERIZATION PROGRAM NOTICE 10-08**  
**ISSUANCE DATE: FEBRUARY 1, 2010**

**SUBJECT:** Weatherization Guidance on Maintaining the Privacy of Recipients of Services

**PURPOSE:** To issue guidance for the Low-Income Weatherization Assistance Program (WAP) on maintaining the privacy of recipients.

**SCOPE:** This guidance is provided to States or other entities named in the Notification of Grant Award as the recipients of financial assistance under the WAP, including the recently added Territories.

**LEGAL AUTHORITY:** Title IV, Energy Conservation and Production Act, as amended, authorizes DOE to administer the WAP. All grant awards made under this Program shall comply with applicable law including the Energy Policy Act of 2005, the Energy Independence and Security Act of 2007, the American Recovery and Reinvestment Act (ARRA) of 2009 and regulations contained in 10 CFR Part 440, 10 CFR Part 600 and other procedures applicable to this regulation as DOE may, from time-to-time, prescribe for the administration of financial assistance.

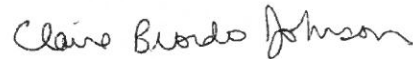
**BACKGROUND:** States receiving funds under WAP have been receiving numerous requests for information regarding the implementation of programs funded through the ARRA. The information requests range from informal inquiries by local elected officials and other community leaders to requests for specific information about recipients from local and regional press outlets. Due, in part, to the increased levels of funding for the WAP - \$5 billion over three years – we anticipate that there will be a number of similar such requests. Therefore, the Department has concluded that it would be prudent to provide guidance for responding to such requests.

**POLICY:** DOE adheres to the transparency requirements placed on these and other government financial assistance programs instituted by the Administration. DOE will work diligently with any state WAP or local service provider to gather the required information and provide it to the requestor. However, the DOE must comply with all requirements on the Government to protect the privacy interests of individuals who participate in these financial assistance programs.

In accordance with 10 CFR 600.153(f), *Retention and access requirements for records*, “Unless required by statute, DOE shall place no restrictions on recipients that limit public access to the records of recipients that are pertinent to an award, *except when DOE can*

*demonstrate that such records shall be kept confidential and would have been exempted from disclosure pursuant to the Freedom of Information Act (5 U.S.C. 552) if the records had belonged to DOE.”* (emphasis added) DOE would be legally required, pursuant to 5 U.S.C. 552(b)(6), of the Freedom of Information Act, to keep confidential any specifically identifying information related to an individual’s eligibility application for WAP, or the individual’s participation in WAP, such as name, address, or income information. Thus, states and local service providers should extend that same protection to their client records for WAP. States may release information about recipients in the aggregate and which does not identify specific individuals. For example, information on the number of recipients in a county, city or a zip code does not compromise the privacy of the recipients.

**CONCLUSION:** Please do not hesitate to contact your Project Officer in the appropriate Project Management Center or Robert Adams at DOE Headquarters if you have questions regarding this issue. As always, thanks for everything you do for the WAP and the citizens you serve. Because of your efforts Weatherization Works!



Claire Broido Johnson  
Acting Program Manager  
Office of Weatherization and Intergovernmental Program  
Energy Efficiency and Renewable Energy

Advisory Council on Historic  
Preservation

The Section 106 Essentials

November 5-6, 2015, Washington, DC

*This will verify that  
Mark A. Adams  
has successfully completed the course*

*Mark A. Adams*

*Mark A. Adams*

*Mark A. Adams*

*Mark A. Adams*

Reid Nelson  
Director, Office of Federal Agency Programs  
Advisory Council on Historic Preservation



Advisory Council on Historic

Preservation

The Section 106 Essentials

April 10-11, 2018, Albuquerque, NM

*This will verify that*

*Rachel Lester*

*has successfully completed the course*



---

Reid Nelson  
Director, Office of Federal Agency Programs  
Advisory Council on Historic Preservation





WEST VIRGINIA DEVELOPMENT OFFICE

1900 Kanawha Boulevard East • Charleston, WV 25305-0311  
(304) 558-2234 • (800) 982-3386 • WVDO.org

April 27, 2018  
File: PNRS-WVDO  
SAI-WV170427-039

Mr. Mark A. Adams  
Weatherization Manager  
West Virginia Development Office  
1900 Kanawha Blvd., East  
Building 3, Suite 700  
Charleston, West Virginia 25305

Dear Mr. Adams:

RE: CFDA # 81.042 Weatherization Assistance for Low-Income Persons

The State Clearinghouse has reviewed the West Virginia Development Office 's request to the U.S. Department of Energy (DOE) for financial assistance in the amount of three million, four hundred and ninety-three, eight hundred and nine dollars (\$3,493,809.00). The funding would come from the U. S. Department of Energy Annual Weatherization Assistance Program and would assist with PY 2018-2019 State of West Virginia Weatherization Assistance Program Grant.

Thank you so much for contacting us here in Community Development. We will assist you in every way possible. This will certify that the requirements of the State's Intergovernmental Review Process have been met, and the State Process is in concurrence with the project. Clearinghouse approval does not constitute approval of the application by the funding agency.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Mary Jo Thompson".

Mary Jo Thompson, Director  
Community Development Division

MJT: sf

cc: USDOE  
All Regional PDCs



**WEST VIRGINIA DEVELOPMENT OFFICE**

1900 Kanawha Boulevard East • Charleston, WV 25305-0311  
(304) 558-2234 • (800) 982-3386 • WVDO.org

**July 7, 2018**

FEDERAL SERVICE DESK  
ATTN: SAM.GOV REGISTRATION PROCESSING  
460 INDUSTRIAL BLVD  
LONDON, KY 40741-7285  
UNITED STATES OF AMERICA

SUBJECT: Information Required to Activate SAM Entity Registration

**Purpose of Letter**

The purpose of this letter is to formally appoint an Entity Administrator for the named Entity and to attest to the accuracy of the information contained in the entity registration.

**Designation of Entity Administrator**

I, Steve Meester, Director, Commerce Administrative Services Division, the below signed individual, hereby confirm that the appointed Entity Administrator is an authorized officer, agent, or representative of the Entity. This letter authorizes the appointed Entity Administrator to manage the Entity's registration record, its associated users, and their roles to the Entity, in the System for Award Management (SAM).

**Entity Covered by this Letter**

**DUNS® Number:** 138838532

**Legal Business Name:** Commerce, West Virginia Department Of, DBA: West Virginia Development Office

**Physical Address:** 1900 Kanawha Boulevard, BLDG 3, Suite 800, Charleston, WV 25305

**Entity Administrator Contact Information**

**Full Name:** Steve Meester

**Phone Number:** (304) 957-2073

**Email Address:** Steve.Meester@wv.gov

*\*The Entity Administrator must have an individual user account in SAM associated with the email address listed.*

## Account Administration Preference (ONLY CHOOSE ONE)

You must choose **ONE** of the two following statements by checking the applicable box.

Remember, there is no cost to register in SAM -- it is free. However, if you choose to have a third-party agent administer your SAM registration, with or without an associated fee, you must check the Third-Party Agent Designation box below.

### Self-Administration Confirmation

For the purpose of registering with the United States Government through the online System for Award Management (SAM), I do not authorize any third party to act on behalf of the Entity listed above. I have checked the Self-Administration Confirmation box to indicate that the designated Entity Administrator is not a third-party agent.

### Third-Party Agent Designation

For the purpose of registering with the United States Government through the online System for Award Management (SAM), I do hereby authorize [insert full name, phone number, address, and email address of the Third-Party Agent] (Designated Third-Party Agent) to act on behalf of the Entity listed above. This authorization permits the Designated Third-Party Agent to conduct all normal, common business functions within SAM while binding the signatory to all actions conducted and representations made as a result of authorization granted herein. I have checked the Third-Party Agent Designation box and completed the above information to indicate that the designated Entity Administrator is a third-party agent.

## Attestation

I, the below-signed, attest to the following:

- All information contained in this letter is complete and accurate.
- Account created with the email address provided in this letter.
- The banking information provided for Electronic Funds Transfer on the Financial Information Page in the SAM.gov registration for the Entity above is correct and accurate.

Respectfully,

Steve Meester



Director, Commerce, Administrative Services Division

Steve.Meester@wv.gov

Commerce, West Virginia Department Of, DBA: West Virginia Development Office

1900 Kanawha Boulevard, BLDG 3, Suite 300, Charleston, WV 25305



TO BE COMPLETED BY NOTARY

(in accordance with State notary requirements)

State of West Virginia

County of Kanawha

This instrument was acknowledged before me this 7<sup>th</sup> day of June (month), 2018

(year), by Steve Measter, Director (name of officer or agent, title or officer

or agent) of Commerce (name of entity).

Personally Known

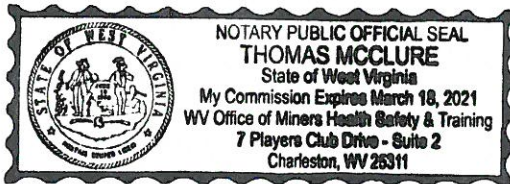
Produced Identification

Type of ID and Number on ID \_\_\_\_\_

(Seal)

Thomas McClure

Signature of Notary



Thomas McClure

Name of Notary

(Typed, Stamped or Printed)

Notary Public, State of WV

# WEST VIRGINIA

## Single Audit



"ABRAHAM LINCOLN WALKS  
AT MIDNIGHT"

FROM POEM BY VACHEL LINDSAY

SCULPTOR

FRED MARTIN TORREY 1884-1967  
BORN IN FAIRMONT, WEST VIRGINIA

DEDICATED

JUNE 20, 1974  
ARCH A. MOORE, JR. GOVERNOR



*For the year ended June 30, 2017*

# ***STATE OF WEST VIRGINIA SINGLE AUDIT***

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***AUDITORS'***  
***REPORTS***

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## Report of Independent Auditors on Internal Control Over Financial Reporting and on Compliance and Other Matters Based on an Audit of Financial Statements Performed in Accordance with *Government Auditing Standards*

The Honorable Jim Justice, Governor  
of the State of West Virginia

We have audited, in accordance with auditing standards generally accepted in the United States and the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States, the financial statements of the governmental activities, the business-type activities, the aggregate discretely presented component units, each major fund and the aggregate remaining fund information of the State of West Virginia as of and for the year ended June 30, 2017, and the related notes to the financial statements, which collectively comprise the State of West Virginia's basic financial statements, and have issued our report thereon dated December 30, 2017. Our report includes a reference to other auditors who audited the financial statements of certain entities within the governmental activities, the business-type activities, the aggregate discretely presented component units, certain major funds, and the aggregate remaining fund information as described in our report on the State of West Virginia's financial statements. This report does not include the results of the other auditors' testing of internal control over financial reporting or compliance and other matters that are reported on separately by those auditors. The financial statements of the West Virginia Investment Management Board was not audited in accordance with *Government Auditing Standards*, the West Virginia Housing Development Fund, the West Virginia Water Development Authority, School Building Authority, and the following discretely presented component units of the Higher Education Fund discretely presented component unit: Big Green Scholarship Foundation, Inc.; Bluefield State College Foundation, Inc.; Bluefield State College Research and Development Corporation; Concord University Foundation, Inc.; Fairmont State Foundation, Inc.; Glenville State College Foundation, Inc.; The Marshall University Foundation, Inc.; New River Community and Technical College Foundation, Inc.; Provident Group-Marshall Properties, LLC; Shepherd University Foundation, Inc.; Southern West Virginia Community College Foundation, Inc.; West Liberty University Foundation, Inc.; West Virginia Northern Community College Foundation, Inc.; West Virginia School of Osteopathic Medicine Foundation, Inc.; The West Virginia State University Foundation, Inc.; and WVU at Parkersburg Foundation, Inc. were audited by other auditors and were not performed in accordance with *Government Auditing Standards*.

### **Internal Control Over Financial Reporting**

In planning and performing our audit of the financial statements, we considered the State of West Virginia's internal control over financial reporting (internal control) to determine the audit procedures that are appropriate in the circumstances for the purpose of expressing our opinion on the financial statements, but not for the purpose of expressing an opinion on the effectiveness of the States of West Virginia's internal control. Accordingly, we do not express an opinion on the effectiveness of the State of West Virginia's internal control.

A *deficiency in internal control* exists when the design or operation of a control does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct misstatements on a timely basis. A *material weakness* is a deficiency, or combination of deficiencies, in internal control, such that there is a reasonable possibility that a material misstatement of the entity's financial statements will not be prevented, or detected and corrected on a timely basis. A *significant deficiency* is a deficiency, or a combination of deficiencies, in internal control that is less severe than a material weakness, yet important enough to merit attention by those charged with governance.



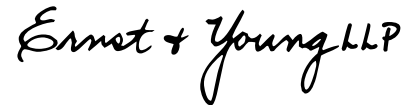
Our consideration of internal control was for the limited purpose described in the first paragraph of this section and was not designed to identify all deficiencies in internal control that might be material weaknesses or significant deficiencies. Given these limitations, during our audit we did not identify any deficiencies in internal control that we consider to be material weaknesses. However, material weaknesses may exist that have not been identified.

### **Compliance and Other Matters**

As part of obtaining reasonable assurance about whether the State of West Virginia's financial statements are free of material misstatement, we performed tests of its compliance with certain provisions of laws, regulations, contracts and grant agreements, noncompliance with which could have a direct and material effect on the determination of financial statement amounts. However, providing an opinion on compliance with those provisions was not an objective of our audit, and accordingly, we do not express such an opinion. The results of our tests disclosed no instances of noncompliance or other matters that are required to be reported under *Government Auditing Standards*.

### **Purpose of this Report**

The purpose of this report is solely to describe the scope of our testing of internal control and compliance and the result of that testing, and not to provide an opinion on the effectiveness of the entity's internal control or on compliance. This report is an integral part of an audit performed in accordance with *Government Auditing Standards* in considering the entity's internal control and compliance. Accordingly, this communication is not suitable for any other purpose.



December 30, 2017





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## Report of Independent Auditors on Compliance for Each Major Federal Program; Report on Internal Control Over Compliance and Report on Schedule of Expenditures of Federal Awards Required by the Uniform Guidance

The Honorable Jim Justice, Governor  
of the State of West Virginia

### **Report on Compliance for Each Major Federal Program**

We have audited the State of West Virginia's compliance with the types of compliance requirements described in the U.S. Office of Management and Budget (OMB) *Compliance Supplement* that could have a direct and material effect on each of the State of West Virginia's major federal programs for the year ended June 30, 2017. The State of West Virginia's major federal programs are identified in the summary of auditor's results section of the accompanying schedule of findings and questioned costs.

The State of West Virginia's basic financial statements include the operations of the West Virginia Housing Development Fund (a proprietary fund), and the following discretely presented component units; the West Virginia University Research Corporation, the West Virginia State University Research and Development Corporation, Marshall University Research Corporation, and West Virginia Drinking Water Treatment Revolving Loan Fund which expended \$311,218,010 collectively, in federal awards which are not included in the schedule of expenditures of federal awards during the year ended June 30, 2017. Our audit, described below, did not include the operations of this proprietary fund and these discretely presented component units, because they engaged other auditors to perform an audit of compliance in accordance with audit requirements of Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance).

### ***Management's Responsibility***

Management is responsible for compliance with federal statutes, regulations and the terms and conditions of its federal awards applicable to its federal programs.

### ***Auditor's Responsibility***

Our responsibility is to express an opinion on compliance for each of the State of West Virginia's major federal programs based on our audit of the types of compliance requirements referred to above. We conducted our audit of compliance in accordance with auditing standards generally accepted in the United States; the standards applicable to financial audits contained in *Government Auditing Standards*, issued by the Comptroller General of the United States; and the audit requirements of Title 2 U.S. *Code of Federal Regulations* Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards* (Uniform Guidance). Those standards and the Uniform Guidance require that we plan and perform the audit to obtain reasonable assurance about whether noncompliance with the types of compliance requirements referred to above that could have a direct and material effect on a major federal program occurred. An audit includes examining, on a test basis, evidence about the State of West Virginia's compliance with those requirements and performing such other procedures as we considered necessary in the circumstances.

We believe that our audit provides a reasonable basis for our qualified and unmodified opinions on compliance for major federal programs. However, our audit does not provide a legal determination of the State of West Virginia's compliance.

***Basis for Adverse Opinion on Disaster Grants – Public Assistance (Presidentially Declared Disasters)***

As described in the accompanying schedule of findings and questioned costs, the State of West Virginia did not comply with requirements of the following:

<b>Finding Number</b>	<b>CFDA Number</b>	<b>Program or Cluster Name</b>	<b>Compliance Requirement</b>
2017-017	97.036	Disaster Grants – Public Assistance (Presidentially Declared Disasters)	Cash Management
2017-018	97.036	Disaster Grants – Public Assistance (Presidentially Declared Disasters)	Subrecipient Monitoring
2017-021	97.036	Disaster Grants – Public Assistance (Presidentially Declared Disasters)	Cash Management

Compliance with such requirements is necessary, in our opinion, for the State of West Virginia to comply with requirements applicable to that program.

***Adverse Opinion on Disaster Grants – Public Assistance (Presidentially Declared Disasters)***

In our opinion, because of the significance of the matter discussed in the Basis for Adverse Opinion paragraph, the State of West Virginia did not comply, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on Disaster Grants – Public Assistance (Presidentially Declared Disasters) for the year ended June 30, 2017.

***Basis for Qualified Opinion on Supplemental Nutrition Assistance Program (SNAP) Cluster, Rehabilitation Services Vocational Rehabilitation Grants to States, Child Care and Development Fund (CCDF) Cluster, and Adoption Assistance***

As described in the accompanying schedule of findings and questioned costs, the State of West Virginia did not comply with requirements regarding the following, individually or in the aggregate:

<b>Finding Number</b>	<b>CFDA Number</b>	<b>Program or Cluster Name</b>	<b>Compliance Requirement</b>
2017-001	10.551/10.561	Supplemental Nutrition Assistance Program (SNAP) Cluster	Special Tests and Provisions - EBT Card Security
2017-003	10.551/10.561/93.575/93.596/93.659	Supplemental Nutrition Assistance Program (SNAP) Cluster, Child Care and Development Fund (CCDF) Cluster, Adoption Assistance	Procurement and Suspension and Debarment
2017-008	84.126	Rehabilitation Services Vocational Rehabilitation Grants to States	Eligibility
2017-014	93.575/93.596	Child Care and Development Fund (CCDF) Cluster	Special Tests and Provisions – Fraud Detection and Repayment
2017-015	93.659	Adoption Assistance	Eligibility

Compliance with such requirements is necessary, in our opinion, for the State of West Virginia to comply with requirements applicable to those programs.

***Qualified Opinion on Supplemental Nutrition Assistance Program (SNAP) Cluster, Rehabilitation Services Vocational Rehabilitation Grants to States, Child Care and Development Fund (CCDF) Cluster, and Adoption Assistance***

In our opinion, except for the noncompliance described in the Basis for Qualified Opinion paragraph, the State of West Virginia complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on Supplemental Nutrition Assistance Program (SNAP) Cluster, Rehabilitation Services Vocational Rehabilitation Grants to States, Child Care and Development Fund (CCDF) Cluster, and Adoption Assistance for the year ended June 30, 2017.

***Unmodified Opinion on Each of the Other Major Federal Programs***

In our opinion, the State of West Virginia complied, in all material respects, with the types of compliance requirements referred to above that could have a direct and material effect on each of its other major federal programs that are identified in the summary of auditors results section of the accompanying schedule of findings and questioned costs for the year ended June 30, 2017.

***Other Matters***

The results of our auditing procedures disclosed other instances of noncompliance which are required to be reported in accordance with the Uniform Guidance, and which are described in the accompanying schedule of findings and questioned costs as items described and listed below:

<b>Finding Number</b>	<b>CFDA Number</b>	<b>Program or Cluster Name</b>	<b>Compliance Requirement</b>
2017-005	84.007/84.033/84.038/ 84.063/84.268/84.379/ 93.264/93.342/93.364/ 93.925	Student Financial Assistance (SFA) Cluster	Special Tests and Provisions – Return of Title IV Funds
2017-007	84.007/84.033/84.038/ 84.063/84.268/84.379/ 93.264/93.342/93.364/ 93.925	Student Financial Assistance (SFA) Cluster	Special Tests and Provisions – Borrower Data Transmission and Reconciliation
2017-011	93.568	Low-Income Home Energy Assistance	Allowable Costs/Cost Principles and Eligibility
2017-012	93.568	Low-Income Home Energy Assistance	Reporting
2017-016	93.775/93.777/93.778	Medicaid Cluster	Eligibility

Our opinion on each major federal program is not modified with respect to these matters.

The State of West Virginia’s responses to the noncompliance findings identified in our audit are described in the accompanying corrective action plan. The State of West Virginia’s response was not subjected to the auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the responses.

**Report on Internal Control Over Compliance**

Management of the State of West Virginia is responsible for establishing and maintaining effective internal control over compliance with the types of compliance requirements referred to above. In planning and performing our audit of compliance, we considered the State of West Virginia’s internal control over compliance with the types of requirements that could have a direct and material effect on each major federal program to determine the auditing

procedures that are appropriate in the circumstances for the purpose of expressing an opinion on compliance for each major program and to test and report on internal control over compliance in accordance with the Uniform Guidance, but not for the purpose of expressing an opinion on the effectiveness of internal control over compliance. Accordingly, we do not express an opinion on the effectiveness of the State of West Virginia’s internal control over compliance.

Our consideration of internal control over compliance was for the limited purpose described in the preceding paragraph and was not designed to identify all deficiencies in internal control over compliance that might be material weaknesses or significant deficiencies and therefore, material weaknesses or significant deficiencies may exist that have not been identified. However, as discussed below, we identified certain deficiencies in internal control over compliance that we consider to be material weaknesses and significant deficiencies.

*A deficiency in internal control over compliance* exists when the design or operation of a control over compliance does not allow management or employees, in the normal course of performing their assigned functions, to prevent, or detect and correct, noncompliance with a type of compliance requirement of a federal program on a timely basis. *A material weakness in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance, such that there is a reasonable possibility that material noncompliance with a type of compliance requirement of a federal program will not be prevented, or detected and corrected, on a timely basis. We consider the deficiencies in internal control over compliance described in the accompanying schedule of findings and questioned costs and as listed below to be material weaknesses.

<b>Finding Number</b>	<b>CFDA Number</b>	<b>Program or Cluster Name</b>	<b>Compliance Requirement</b>
2017-001	10.551/10.561	Supplemental Nutrition Assistance Program (SNAP) Cluster	Special Tests and Provisions - EBT Card Security
2017-002	10.551/10.561/93.558/93.568/93.575/93.596/93.658/93.659/93.767	Supplemental Nutrition Assistance Program (SNAP) Cluster; Temporary Assistance for Needy Families (TANF) Cluster; Low-Income Home Energy Assistance; Child Care and Development Fund (CCDF) Cluster; Foster Care—Title IV-E; Adoption Assistance; Children’s Health Insurance Program (CHIP)	Activities Allowed or Unallowed; Allowable Costs/Cost Principles; Eligibility; Period of Availability of Federal Funds/Period of Performance; Special Tests and Provisions – ADP System for SNAP
2017-006	84.007/84.033/84.038/84.063/84.268/84.379/93.264/93.342/93.364/93.925	Student Financial Assistance (SFA) Cluster	Special Tests and Provisions – Enrollment Reporting
2017-008	84.126	Rehabilitation Services Vocational Rehabilitation Grants to States	Eligibility
2017-010	93.558	Temporary Assistance for Needy Families (TANF) Cluster	Special Tests and Provisions – Child Support Non-Cooperation, Penalty for Refusal to work, and Adult Custodial Parent of Child Under Six When Child Care Not Available
2017-012	93.568	Low-Income Home Energy Assistance	Reporting
2017-013	93.575/93.596	Child Care and Development Fund (CCDF) Cluster	Allowable Costs/Cost Principles and Eligibility

<b>Finding Number</b>	<b>CFDA Number</b>	<b>Program or Cluster Name</b>	<b>Compliance Requirement</b>
2017-014	93.575/93.596	Child Care and Development Fund (CCDF) Cluster	Special Tests and Provisions – Fraud Detection and Repayment
2017-015	93.659	Adoption Assistance	Eligibility
2017-017	97.036	Disaster Grants – Public Assistance (Presidentially Declared Disasters)	Cash Management
2017-018	97.036	Disaster Grants – Public Assistance (Presidentially Declared Disasters)	Subrecipient Monitoring
2017-019	97.036	Disaster Grants – Public Assistance (Presidentially Declared Disasters)	Reporting
2017-020	97.036	Disaster Grants – Public Assistance (Presidentially Declared Disasters)	Reporting
2017-021	97.036	Disaster Grants – Public Assistance (Presidentially Declared Disasters)	Cash Management

A *significant deficiency in internal control over compliance* is a deficiency, or a combination of deficiencies, in internal control over compliance with a type of compliance requirement of a federal program that is less severe than a material weakness, yet important enough to merit attention by those charged with governance. We consider the deficiencies in internal control over compliance described in the accompanying schedule of findings and questioned costs and as listed below to be significant deficiencies.

<b>Finding Number</b>	<b>CFDA Number</b>	<b>Program or Cluster Name</b>	<b>Compliance Requirement</b>
2017-003	10.551/10.561 93.558 93.568 93.575/93.596 93.658 93.659 93.767 93.775/93.777/93.778	Supplemental Nutrition Assistance Program (SNAP) Cluster, Temporary Assistance for Needy Families (TANF) Cluster, Low-Income Home Energy Assistance, Child Care and Development Fund (CCDF) Cluster, Foster Care— Title IV-E, Adoption Assistance, Children’s Health Insurance Program (CHIP), Medicaid Cluster	Procurement and Suspension and Debarment
2017-004	84.007/84.033/84.038/ 84.063/84.268/84.379/ 93.264/93.342/93.364/ 93.925	Student Financial Assistance (SFA) Cluster	Reporting
2017-005	84.007/84.033/84.038/ 84.063/84.268/84.379/ 93.264/93.342/93.364/ 93.925	Student Financial Assistance (SFA) Cluster	Special Tests and Provisions – Return of Title IV Funds
2017-007	84.007/84.033/84.038/ 84.063/84.268/84.379/ 93.264/93.342/93.364/ 93.925	Student Financial Assistance (SFA) Cluster	Special Tests and Provisions – Borrower Data Transmission and Reconciliation

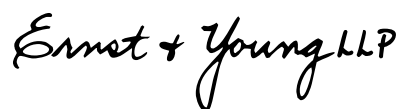
<b>Finding Number</b>	<b>CFDA Number</b>	<b>Program or Cluster Name</b>	<b>Compliance Requirement</b>
2017-009	84.126	Rehabilitation Services Vocational Rehabilitation Grants to States	Reporting
2017-011	93.568	Low-Income Home Energy Assistance	Allowable Costs/Cost Principles and Eligibility
2017-016	93.775/93.777/93.778	Medicaid Cluster	Eligibility

The State of West Virginia’s response to the internal control over compliance findings identified in our audit are described in the accompanying schedule of findings and questioned costs and corrective action plan. The State of West Virginia’s responses were not subjected to the auditing procedures applied in the audit of compliance and, accordingly, we express no opinion on the responses.

The purpose of this report on internal control over compliance is solely to describe the scope of our testing of internal control over compliance and the results of that testing based on the requirements of the Uniform Guidance. Accordingly, this report is not suitable for any other purpose.

**Report on Schedule of Expenditures of Federal Awards Required by the Uniform Guidance**

We have audited the financial statements of the State of West Virginia as of and for the year ended June 30, 2017, and have issued our report thereon dated December 30, 2017, which contained an unmodified opinion on those financial statements. Our audit was conducted for the purpose of forming an opinion on the financial statements as a whole. The accompanying schedule of expenditures of federal awards is presented for purposes of additional analysis as required by the Uniform Guidance and is not a required part of the financial statements. Such information is the responsibility of management and was derived from and relates directly to the underlying accounting and other records used to prepare the financial statements. The information has been subjected to the auditing procedures applied in the audit of the financial statements and certain additional procedures, including comparing and reconciling such information directly to the underlying accounting and other records used to prepare the financial statements or to the financial statements themselves, and other additional procedures in accordance with auditing standards generally accepted in the United States. In our opinion, the schedule of expenditure of federal awards is fairly stated in all material respects in relation to the financial statements as a whole.



February 27, 2018

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***SCHEDULE OF  
EXPENDITURES  
OF FEDERAL  
AWARDS***

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STATE OF WEST VIRGINIA  
SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS  
FEDERAL GRANTOR LISTING  
FOR THE YEAR ENDING JUNE 30, 2017

FEDERAL CFDA / GRANT/ CONTRACT NUMBER	NAME OF PROGRAM	STATE OF WEST VIRGINIA EXPENDITURES	TOTAL SUBRECIPIENT EXPENDITURES	TOTAL FEDERAL EXPENDITURES
<u>DEPARTMENT OF AGRICULTURE</u>				
10.025	PLANT AND ANIMAL DISEASE, PEST CONTROL, AND ANIMAL CARE	\$837,947	\$0	\$837,947
10.072	WETLANDS RESERVE PROGRAM	\$7,672	\$0	\$7,672
10.117	BIOFUEL INFRASTRUCTURE PARTNERSHIP	\$0	\$1,440,626	\$1,440,626
10.170	SPECIALTY CROP BLOCK GRANT PROGRAM - FARM BILL	\$69,111	\$108,854	\$177,965
10.171	ORGANIC CERTIFICATION COST SHARE PROGRAMS	\$10,410	\$0	\$10,410
10.202***	COOPERATIVE FORESTRY RESEARCH PAYMENTS TO AGRICULTURAL EXPERIMENT STATIONS UNDER THE	\$560,410	\$0	\$560,410
10.203***	HATCH ACT	\$3,212,551	\$0	\$3,212,551
10.207***	ANIMAL HEALTH AND DISEASE RESEARCH	\$10,411	\$0	\$10,411
10.216	1890 INSTITUTION CAPACITY BUILDING GRANTS COOPERATIVE AGREEMENTS WITH STATES FOR INTRASTATE MEAT	\$11,534	\$0	\$11,534
10.475	AND POULTRY INSPECTION	\$581,651	\$0	\$581,651
10.479	FOOD SAFETY COOPERATIVE AGREEMENTS	\$210,521	\$0	\$210,521
10.500	COOPERATIVE EXTENSION SERVICE	\$4,244,578	\$0	\$4,244,578
10.547	PROFESSIONAL STANDARDS FOR SCHOOL NUTRITION EMPLOYEES SPECIAL SUPPLEMENTAL NUTRITION PROGRAM FOR WOMEN,	\$47,168	\$0	\$47,168
10.557	INFANTS, AND CHILDREN	\$21,271,505	\$9,249,665	\$30,521,170
10.558	CHILD AND ADULT CARE FOOD PROGRAM	\$109,255	\$17,718,153	\$17,827,408
10.560	STATE ADMINISTRATIVE EXPENSES FOR CHILD NUTRITION	\$1,990,851	\$0	\$1,990,851
10.572	WIC FARMERS' MARKET NUTRITION PROGRAM (FMNP)	\$41,145	\$0	\$41,145
10.574	TEAM NUTRITION GRANTS	\$2,155	\$260,857	\$263,012
10.575	FARM TO SCHOOL GRANT PROGRAM	\$0	\$13,302	\$13,302
10.576	SENIOR FARMERS MARKET NUTRITION PROGRAM	\$394,039	\$0	\$394,039
10.579	CHILD NUTRITION DISCRETIONARY GRANTS LIMITED AVAILABILITY	\$0	\$159,166	\$159,166
10.582	FRESH FRUIT AND VEGETABLE PROGRAM	\$39,502	\$2,132,792	\$2,172,294
10.589	CHILD NUTRITION DIRECT CERTIFICATION PERFORMANCE AWARDS	\$266	\$0	\$266
10.664	COOPERATIVE FORESTRY ASSISTANCE SCHOOLS AND ROADS-GRANTS TO STATES AND FOREST SERVICE	\$1,060,822	\$120,269	\$1,181,091
10.665	SCHOOLS AND ROADS CLUSTER	\$306,895	\$50,457	\$357,352
10.676	FOREST LEGACY PROGRAM	\$35,377	\$0	\$35,377
10.678	FOREST STEWARDSHIP PROGRAM	\$100,339	\$0	\$100,339
10.680	FOREST HEALTH PROTECTION	\$265,781	\$0	\$265,781
10.684	INTERNATIONAL FORESTRY PROGRAMS	\$147,933	\$0	\$147,933
10.868	RURAL ENERGY FOR AMERICA PROGRAM	\$34,211	\$0	\$34,211
10.902	SOIL AND WATER CONSERVATION	\$25,991	\$0	\$25,991
10.903	SOIL SURVEY	\$28,375	\$0	\$28,375
10.904	WATERSHED PROTECTION AND FLOOD PREVENTION	\$18,312	\$0	\$18,312
10.912	ENVIRONMENTAL QUALITY INCENTIVES PROGRAM	\$223,922	\$0	\$223,922
10.913	FARM AND RANCH LANDS PROTECTION PROGRAM	\$43,302	\$0	\$43,302
10.916	WATERSHED REHABILITATION PROGRAM	\$1,718,957	\$0	\$1,718,957
<b>SNAP CLUSTER</b>				
10.551	SUPPLEMENTAL NUTRITION ASSISTANCE PROGRAM (SNAP) STATE ADMINISTRATIVE MATCHING GRANTS FOR THE SUPPLEMENTAL	\$490,482,593	\$0	\$490,482,593
10.561	NUTRITION ASSISTANCE PROGRAM	\$16,959,910	\$4,272,993	\$21,232,903
	<b>TOTAL SNAP CLUSTER</b>	<b>\$507,442,503</b>	<b>\$4,272,993</b>	<b>\$511,715,496</b>
<b>CHILD NUTRITION CLUSTER</b>				
10.553	SCHOOL BREAKFAST PROGRAM (SBP)	\$181,959	\$42,911,372	\$43,093,331
10.555	NATIONAL SCHOOL LUNCH PROGRAM (NSLP)	\$10,645,522	\$80,998,592	\$91,644,114
10.556	SPECIAL MILK PROGRAM FOR CHILDREN (SMP)	\$0	\$16,159	\$16,159
10.559	SUMMER FOOD SERVICE PROGRAM FOR CHILDREN (SFSPC)	\$68,991	\$1,625,188	\$1,694,179
	<b>TOTAL CHILD NUTRITION CLUSTER</b>	<b>\$10,896,472</b>	<b>\$125,551,311</b>	<b>\$136,447,783</b>
<b>FOOD DISTRIBUTION CLUSTER</b>				
10.565	COMMODITY SUPPLEMENTAL FOOD PROGRAM	\$183,294	\$45,979	\$229,273
10.568	EMERGENCY FOOD ASSISTANCE PROGRAM (ADMINISTRATIVE COSTS)	\$38,435	\$414,317	\$452,752
10.569	EMERGENCY FOOD ASSISTANCE PROGRAM (FOOD COMMODITIES)	\$3,400,010	\$0	\$3,400,010
	<b>TOTAL FOOD DISTRIBUTION CLUSTER</b>	<b>\$3,621,739</b>	<b>\$460,296</b>	<b>\$4,082,035</b>
15-JV-11261975-070	THE IMPACT OF CLIMATE CHANGE ON COASTAL ALASKA FOREST	\$22,100	\$0	\$22,100
2017-CR-11062759-	NATIONAL VISITOR USE MONITORING	\$103,911	\$0	\$103,911
NFS 2010-CR-	REGION 6 ROUND 3 NVMU	\$376,045	\$0	\$376,045
<b>TOTAL DEPARTMENT OF AGRICULTURE</b>		<b>\$560,125,669</b>	<b>\$161,538,741</b>	<b>\$721,664,410</b>

**STATE OF WEST VIRGINIA  
SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS  
FEDERAL GRANTOR LISTING  
FOR THE YEAR ENDING JUNE 30, 2017**

FEDERAL CFDA / GRANT/ CONTRACT NUMBER	NAME OF PROGRAM	STATE OF WEST VIRGINIA EXPENDITURES	TOTAL SUBRECIPIENT EXPENDITURES	TOTAL FEDERAL EXPENDITURES
<u>DEPARTMENT OF COMMERCE</u>				
11.549	STATE AND LOCAL IMPLEMENTATION GRANT PROGRAM	\$218,416	\$0	\$218,416
11.620	SCIENCE, TECHNOLOGY, BUSINESS AND/OR EDUCATION OUTREACH	\$32,003	\$0	\$32,003
<b>TOTAL DEPARTMENT OF COMMERCE</b>		<b>\$250,419</b>	<b>\$0</b>	<b>\$250,419</b>
<u>DEPARTMENT OF DEFENSE</u>				
12.113	STATE MEMORANDUM OF AGREEMENT PROGRAM FOR THE	\$274,248	\$0	\$274,248
12.400	MILITARY CONSTRUCTION, NATIONAL GUARD	\$207,029	\$0	\$207,029
12.401	NATIONAL GUARD MILITARY OPERATIONS AND MAINTENANCE (O&M)	\$25,843,425	\$0	\$25,843,425
12.404	NATIONAL GUARD CHALLENGE PROGRAM	\$4,549,952	\$0	\$4,549,952
12.617	ECONOMIC ADJUSTMENT ASSISTANCE FOR STATE GOVERNMENTS	\$201,254	\$0	\$201,254
12.900	LANGUAGE GRANT PROGRAM	\$31,137	\$57,449	\$88,586
<b>TOTAL DEPARTMENT OF DEFENSE</b>		<b>\$31,107,045</b>	<b>\$57,449</b>	<b>\$31,164,494</b>
<u>DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT</u>				
14.110	MANUFACTURED HOME LOAN INSURANCE-FINANCING PURCHASE OF MANUFACTURED HOMES AS PRINCIPAL RESIDENCES OF BORROWERS COMMUNITY DEVELOPMENT BLOCK GRANTS/STATE'S PROGRAM AND	\$99,169	\$0	\$99,169
14.228	NON-ENTITLEMENT GRANTS IN HAWAII	\$461,375	\$9,534,252	\$9,995,627
14.231	EMERGENCY SOLUTIONS GRANT PROGRAM	\$45,991	\$1,343,409	\$1,389,400
14.241	HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS	\$6,694	\$331,902	\$338,596
14.400	EQUAL OPPORTUNITY IN HOUSING	\$86,082	\$0	\$86,082
<b>TOTAL DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT</b>		<b>\$699,311</b>	<b>\$11,209,563</b>	<b>\$11,908,874</b>
<u>DEPARTMENT OF THE INTERIOR</u>				
15.250	REGULATION OF SURFACE COAL MINING AND SURFACE EFFECTS OF UNDERGROUND COAL MINING	\$11,481,189	\$0	\$11,481,189
15.252	ABANDONED MINE LAND RECLAMATION (AMLR) SCIENCE AND TECHNOLOGY PROJECTS RELATED TO COAL MINING AND RECLAMATION	\$21,333,324	\$12,856,572	\$34,189,896
15.255	FLOOD CONTROL ACT LANDS	\$63,656	\$30,711	\$94,367
15.608	FISH AND WILDLIFE MANAGEMENT ASSISTANCE	\$49,000	\$0	\$49,000
15.612	ENDANGERED SPECIES CONSERVATION	\$40,695	\$0	\$40,695
15.615	COOPERATIVE ENDANGERED SPECIES CONSERVATION FUND	\$52,757	\$0	\$52,757
15.634	STATE WILDLIFE GRANTS ENDANGERED SPECIES CONSERVATION - RECOVERY IMPLEMENTATION FUNDS	\$697,510	\$0	\$697,510
15.657	U.S. GEOLOGICAL SURVEY - RESEARCH AND DATA COLLECTION	\$60,343	\$0	\$60,343
15.808	NATIONAL COOPERATIVE GEOLOGIC MAPPING	\$54,014	\$0	\$54,014
15.810	COOPERATIVE RESEARCH UNITS PROGRAM	\$73,761	\$0	\$73,761
15.812	NATIONAL GEOLOGICAL AND GEOPHYSICAL DATA PRESERVATION	\$24,268	\$0	\$24,268
15.814	HISTORIC PRESERVATION FUND GRANTS-IN-AID	\$19,553	\$0	\$19,553
15.904	OUTDOOR RECREATION-ACQUISITION, DEVELOPMENT AND PLANNING	\$624,471	\$147,882	\$772,353
15.916	NATIVE AMERICAN GRAVES PROTECTION AND REPATRIATION ACT	\$32,337	\$263,450	\$295,787
15.922	NATIONAL HERITAGE AREA FEDERAL FINANCIAL ASSISTANCE	\$734	\$0	\$734
15.939	NATURAL RESOURCE STEWARDSHIP	\$282,234	\$0	\$282,234
15.944	COOPERATIVE RESEARCH AND TRAINING PROGRAMS - RESOURCES OF THE NATIONAL PARK SYSTEM	\$8,330	\$0	\$8,330
15.945		\$39,364	\$0	\$39,364
<b>FISH AND WILDLIFE CLUSTER</b>				
15.605	SPORT FISH RESTORATION	\$10,983,955	\$0	\$10,983,955
15.611	WILDLIFE RESTORATION AND BASIC HUNTER EDUCATION	\$5,680,365	\$0	\$5,680,365
<b>TOTAL FISH AND WILDLIFE CLUSTER</b>		<b>\$16,664,320</b>	<b>\$0</b>	<b>\$16,664,320</b>
<b>TOTAL DEPARTMENT OF THE INTERIOR</b>		<b>\$51,634,020</b>	<b>\$13,298,615</b>	<b>\$64,932,635</b>
<u>DEPARTMENT OF JUSTICE</u>				
16.017	SEXUAL ASSAULT SERVICES FORMULA PROGRAM	\$1,475	\$362,753	\$364,228
16.523	JUVENILE ACCOUNTABILITY BLOCK GRANTS GRANTS TO REDUCE DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, AND STALKING ON CAMPUS	\$446	\$551	\$997
16.525	ENHANCED TRAINING AND SERVICES TO END VIOLENCE AND ABUSE OF WOMEN LATER IN LIFE	\$175,094	\$0	\$175,094
16.528	JUVENILE JUSTICE AND DELINQUENCY PREVENTION	\$1,384	\$75,076	\$76,460
16.540	MISSING CHILDREN'S ASSISTANCE	\$75,641	\$349,179	\$424,820
16.543	STATE JUSTICE STATISTICS PROGRAM FOR STATISTICAL ANALYSIS CENTERS	\$446,799	\$0	\$446,799
16.550	NATIONAL CRIMINAL HISTORY IMPROVEMENT PROGRAM (NCHIP)	\$69,330	\$65,346	\$134,676
16.554		\$1,002,185	\$0	\$1,002,185

**STATE OF WEST VIRGINIA  
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FEDERAL GRANTOR LISTING  
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FEDERAL CFDA / GRANT/ CONTRACT NUMBER	NAME OF PROGRAM	STATE OF WEST VIRGINIA EXPENDITURES	TOTAL SUBRECIPIENT EXPENDITURES	TOTAL FEDERAL EXPENDITURES
	CRIMINAL JUSTICE RESEARCH AND DEVELOPMENT-GRADUATE			
16.562	RESEARCH FELLOWSHIPS	\$106,232	\$0	\$106,232
16.575	CRIME VICTIM ASSISTANCE	\$504,531	\$4,795,145	\$5,299,676
16.576	CRIME VICTIM COMPENSATION	\$400,000	\$0	\$400,000
16.579	EDWARD BYRNE MEMORIAL FORMULA GRANT PROGRAM	\$1,465,642	\$1,008,439	\$2,474,081
16.582	CRIME VICTIM ASSISTANCE/DISCRETIONARY GRANTS	\$0	\$25,713	\$25,713
16.585	DRUG COURT DISCRETIONARY GRANT PROGRAM	\$600,855	\$0	\$600,855
16.588	VIOLENCE AGAINST WOMEN FORMULA GRANTS	\$344,387	\$969,788	\$1,314,175
	RURAL DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, AND STALKING ASSISTANCE PROGRAM	\$6,052	\$153,062	\$159,114
16.589	GRANTS TO ENCOURAGE ARREST POLICIES AND ENFORCEMENT OF PROTECTION ORDERS PROGRAM	\$173,397	\$453,245	\$626,642
16.590	RESIDENTIAL SUBSTANCE ABUSE TREATMENT FOR STATE PRISONERS	\$136,908	\$0	\$136,908
16.593	PUBLIC SAFETY PARTNERSHIP AND COMMUNITY POLICING GRANTS	\$139,198	\$0	\$139,198
16.710	PREA PROGRAM: DEMONSTRATION PROJECTS TO ESTABLISH "ZERO TOLERANCE" CULTURES FOR SEXUAL ASSAULT IN CORRECTIONAL FACILITIES	\$0	\$17,448	\$17,448
16.735	EDWARD BYRNE MEMORIAL JUSTICE ASSISTANCE GRANT PROGRAM	\$92,440	\$0	\$92,440
16.738	DNA BACKLOG REDUCTION PROGRAM	\$315,172	\$0	\$315,172
16.741	PAUL COVERDELL FORENSIC SCIENCES IMPROVEMENT GRANT PROGRAM	\$67,920	\$0	\$67,920
16.742	CRIMINAL AND JUVENILE JUSTICE AND MENTAL HEALTH COLLABORATION PROGRAM	\$5,458	\$0	\$5,458
16.745	NICS ACT RECORD IMPROVEMENT PROGRAM	\$1,854,410	\$0	\$1,854,410
16.813	JOHN R. JUSTICE PROSECUTORS AND DEFENDERS INCENTIVE ACT	\$26,634	\$0	\$26,634
16.816	BYRNE CRIMINAL JUSTICE INNOVATION PROGRAM	\$2,919	\$0	\$2,919
16.817	NATIONAL SEXUAL ASSAULT KIT INITIATIVE	\$109,910	\$38,018	\$147,928
16.833	MISCELLANEOUS JUSTICE PROGRAMS	\$608,574	\$0	\$608,574
2001100	REGIONAL COMMUNITY POLICING INSTITUTE	\$22,189	\$0	\$22,189
2001HSWXK035	EQUITABLE SHARING PROGRAM-JUSTICE	\$116,294	\$0	\$116,294
E/S-JUSTICE	PURDUE PHARMA SETTLEMENT	\$169,639	\$0	\$169,639
PURDUE				
<b>TOTAL DEPARTMENT OF JUSTICE</b>		<b>\$9,041,115</b>	<b>\$8,313,763</b>	<b>\$17,354,878</b>
<b>DEPARTMENT OF LABOR</b>				
17.002	LABOR FORCE STATISTICS	\$567,188	\$0	\$567,188
17.005	COMPENSATION AND WORKING CONDITIONS	\$69,960	\$0	\$69,960
17.225	UNEMPLOYMENT INSURANCE (NOTE 4)	\$390,059,841	\$0	\$390,059,841
17.235	SENIOR COMMUNITY SERVICE EMPLOYMENT PROGRAM	\$69,011	\$992,312	\$1,061,323
17.245	TRADE ADJUSTMENT ASSISTANCE	\$2,574,253	\$0	\$2,574,253
17.268	H-1B JOB TRAINING GRANTS	\$211,201	\$0	\$211,201
17.269	COMMUNITY BASED JOB TRAINING GRANTS	\$35,214	\$0	\$35,214
17.271	WORK OPPORTUNITY TAX CREDIT PROGRAM (WOTC)	\$181,685	\$0	\$181,685
17.273	TEMPORARY LABOR CERTIFICATION FOR FOREIGN WORKERS WIOA NATIONAL DISLOCATED WORKER GRANTS/WIA NATIONAL EMERGENCY GRANTS	(\$14,405)	\$0	(\$14,405)
17.277	TRADE ADJUSTMENT ASSISTANCE COMMUNITY COLLEGE AND CAREER TRAINING (TAACCCT) GRANTS	\$2,012,100	\$7,923,672	\$9,935,772
17.282	APPRENTICESHIP USA GRANTS	\$7,989,457	\$0	\$7,989,457
17.285	CONSULTATION AGREEMENTS	\$15,407	\$0	\$15,407
17.504	MINE HEALTH AND SAFETY GRANTS	\$382,388	\$0	\$382,388
17.600	MISCELLANEOUS LABOR PROGRAMS	\$662,798	\$0	\$662,798
17.999		(\$132,484)	\$0	(\$132,484)
<b>EMPLOYMENT SERVICE CLUSTER</b>				
17.207	EMPLOYMENT SERVICE/WAGNER-PEYSER FUNDED ACTIVITIES	\$5,544,227	\$0	\$5,544,227
17.801	DISABLED VETERANS' OUTREACH PROGRAM (DVOP)	\$564,032	\$0	\$564,032
17.804	LOCAL VETERANS' EMPLOYMENT REPRESENTATIVE (LVER) PROGRAM	\$159,859	\$0	\$159,859
<b>TOTAL EMPLOYMENT SERVICE CLUSTER</b>		<b>\$6,268,118</b>	<b>\$0</b>	<b>\$6,268,118</b>
<b>WIOA CLUSTER</b>				
17.258	WIA/WIOA - ADULT PROGRAM	\$210,571	\$4,332,982	\$4,543,553
17.259	WIA/WIOA - YOUTH ACTIVITIES	\$490,830	\$4,386,491	\$4,877,321
17.278	WIA/WIOA DISLOCATED WORKER FORMULA GRANTS	\$1,714,233	\$4,331,411	\$6,045,644
<b>TOTAL WIOA CLUSTER</b>		<b>\$2,415,634</b>	<b>\$13,050,884</b>	<b>\$15,466,518</b>
<b>TOTAL DEPARTMENT OF LABOR</b>		<b>\$413,367,366</b>	<b>\$21,966,868</b>	<b>\$435,334,234</b>

STATE OF WEST VIRGINIA  
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FEDERAL CFDA / GRANT/ CONTRACT NUMBER	NAME OF PROGRAM	STATE OF WEST VIRGINIA EXPENDITURES	TOTAL SUBRECIPIENT EXPENDITURES	TOTAL FEDERAL EXPENDITURES
<u>DEPARTMENT OF STATE</u>				
19.009	ACADEMIC EXCHANGE PROGRAMS - UNDERGRADUATE PROGRAMS	\$40,208	\$0	\$40,208
<u>TOTAL DEPARTMENT OF STATE</u>		<u>\$40,208</u>	<u>\$0</u>	<u>\$40,208</u>
<u>DEPARTMENT OF TRANSPORTATION</u>				
20.205*	HIGHWAY PLANNING AND CONSTRUCTION	\$420,715,935	\$5,568,998	\$426,284,933
20.218	NATIONAL MOTOR CARRIER SAFETY	\$1,640,969	\$0	\$1,640,969
20.219*	RECREATIONAL TRAILS PROGRAM	\$531,412	\$0	\$531,412
20.232	COMMERCIAL DRIVER'S LICENSE PROGRAM IMPLEMENTATION GRANT	\$29,509	\$0	\$29,509
20.237	MOTOR CARRIER SAFETY ASSISTANCE HIGH PRIORITY GRANTS AND COOPERATIVE AGREEMENTS	\$955,776	\$0	\$955,776
20.505	METROPOLITAN TRANSPORTATION PLANNING AND STATE AND NON-METROPOLITAN PLANNING AND RESEARCH	\$5,279	\$64,544	\$69,823
20.509	FORMULA GRANTS FOR RURAL AREAS	\$1,299,862	\$5,099,477	\$6,399,339
20.514	PUBLIC TRANSPORTATION RESEARCH	\$35,868	\$0	\$35,868
20.528	RAIL FIXED GUIDEWAY PUBLIC TRANSPORTATION SYSTEM STATE SAFETY OVERSIGHT FORMULA GRANT PROGRAM	\$87,124	\$0	\$87,124
20.607	ALCOHOL OPEN CONTAINER REQUIREMENTS	\$3,894,431	\$773,344	\$4,667,775
20.614	NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION (NHTSA) DISCRETIONARY SAFETY GRANTS AND COOPERATIVE AGREEMENTS	\$49,924	\$0	\$49,924
20.700	PIPELINE SAFETY PROGRAM STATE BASE GRANT	\$703,115	\$0	\$703,115
20.703	INTERAGENCY HAZARDOUS MATERIALS PUBLIC SECTOR TRAINING AND PLANNING GRANTS	\$406,319	\$89,322	\$495,641
20.724	PIPELINE SAFETY RESEARCH COMPETITIVE ACADEMIC AGREEMENT PROGRAM (CAAP)	\$226,384	\$0	\$226,384
20.933	NATIONAL INFRASTRUCTURE INVESTMENTS	\$2,745,534	\$0	\$2,745,534
<b>FEDERAL TRANSIT CLUSTER</b>				\$0
20.500	FEDERAL TRANSIT - CAPITAL INVESTMENT GRANTS	\$1,194,922	\$0	\$1,194,922
20.526	BUS AND BUS FACILITIES FORMULA PROGRAM	\$450,414	\$0	\$450,414
<b>TOTAL FEDERAL TRANSIT CLUSTER</b>		<b>\$1,645,336</b>	<b>\$0</b>	<b>\$1,645,336</b>
<b>TRANSIT SERVICES PROGRAMS CLUSTER</b>				
20.513	ENHANCED MOBILITY OF SENIORS AND INDIVIDUALS WITH DISABILITIES	\$639,971	\$782,912	\$1,422,883
20.521	NEW FREEDOM PROGRAM	\$124,075	\$11,664	\$135,739
<b>TOTAL TRANSIT SERVICES PROGRAMS CLUSTER</b>		<b>\$764,046</b>	<b>\$794,576</b>	<b>\$1,558,622</b>
<b>HIGHWAY SAFETY CLUSTER</b>				
20.600	STATE AND COMMUNITY HIGHWAY SAFETY	\$1,070,698	\$982,741	\$2,053,439
20.601	ALCOHOL IMPAIRED DRIVING COUNTERMEASURES INCENTIVE GRANTS I	\$338,914	\$223,382	\$562,296
20.609	SAFETY BELT PERFORMANCE GRANTS	\$0	\$115,624	\$115,624
20.610	STATE TRAFFIC SAFETY INFORMATION SYSTEM IMPROVEMENTS GRANTS	\$718,815	\$0	\$718,815
20.612	INCENTIVE GRANT PROGRAM TO INCREASE MOTORCYCLIST SAFETY	\$42,547	\$4,553	\$47,100
20.613	CHILD SAFETY AND CHILD BOOSTER SEAT INCENTIVE GRANTS	\$41,519	\$14,195	\$55,714
20.616	NATIONAL PRIORITY SAFETY PROGRAMS	\$1,148,805	\$1,471,570	\$2,620,375
<b>TOTAL HIGHWAY SAFETY CLUSTER</b>		<b>\$3,361,298</b>	<b>\$2,812,065</b>	<b>\$6,173,363</b>
<b>TOTAL DEPARTMENT OF TRANSPORTATION</b>		<b>\$439,098,121</b>	<b>\$15,202,326</b>	<b>\$454,300,447</b>
<u>DEPARTMENT OF THE TREASURY</u>				
E/S-TREASURY	EQUITABLE SHARING PROGRAM-TREASURY	\$1,329	\$0	\$1,329
<u>TOTAL DEPARTMENT OF THE TREASURY</u>		<u>\$1,329</u>	<u>\$0</u>	<u>\$1,329</u>
<u>APPALACHIAN REGIONAL COMMISSION</u>				
23.001	APPALACHIAN REGIONAL DEVELOPMENT	\$4,500	\$0	\$4,500
23.002	APPALACHIAN AREA DEVELOPMENT	\$487,995	\$1,029,873	\$1,517,868
23.003*	APPALACHIAN DEVELOPMENT HIGHWAY SYSTEM	\$13,700,375	\$0	\$13,700,375
<u>TOTAL APPALACHIAN REGIONAL COMMISSION</u>		<u>\$14,192,870</u>	<u>\$1,029,873</u>	<u>\$15,222,743</u>
<u>EQUAL EMPLOYMENT OPPORTUNITY COMMISSION</u>				
30.001	EMPLOYMENT DISCRIMINATION-TITLE VII OF THE CIVIL RIGHTS ACT OF 1964	\$141,018	\$0	\$141,018
<u>TOTAL EQUAL EMPLOYMENT OPPORTUNITY COMMISSION</u>		<u>\$141,018</u>	<u>\$0</u>	<u>\$141,018</u>

**STATE OF WEST VIRGINIA  
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<u>GENERAL SERVICES ADMINISTRATION</u>				
39.003	DONATION OF FEDERAL SURPLUS PERSONAL PROPERTY	\$101,674	\$0	\$101,674
<u>TOTAL GENERAL SERVICES ADMINISTRATION</u>		<u>\$101,674</u>	<u>\$0</u>	<u>\$101,674</u>
<u>NATIONAL AERONAUTICS AND SPACE ADMINISTRATION</u>				
43.001	SCIENCE	\$307,419	\$0	\$307,419
43.008	EDUCATION (NOTE 3)	\$44,049	\$0	\$44,049
<u>TOTAL NATIONAL AERONAUTICS AND SPACE ADMINISTRATION</u>		<u>\$351,468</u>	<u>\$0</u>	<u>\$351,468</u>
<u>INSTITUTE OF MUSEUM AND LIBRARY SERVICES</u>				
45.025	PROMOTION OF THE ARTS-PARTNERSHIP AGREEMENTS	\$304,099	\$521,559	\$825,658
45.163	PROMOTION OF THE HUMANITIES-PROFESSIONAL DEVELOPMENT	\$113,876	\$0	\$113,876
45.310	GRANTS TO STATES	\$1,089,792	\$208,527	\$1,298,319
<u>TOTAL INSTITUTE OF MUSEUM AND LIBRARY SERVICES</u>		<u>\$1,507,767</u>	<u>\$730,086</u>	<u>\$2,237,853</u>
<u>NATIONAL SCIENCE FOUNDATION</u>				
47.049***	MATHEMATICAL AND PHYSICAL SCIENCES	\$26,960	\$0	\$26,960
47.076***	EDUCATION AND HUMAN RESOURCES	\$791,493	\$0	\$791,493
47.081***	OFFICE OF EXPERIMENTAL PROGRAM TO STIMULATE COMPETITIVE RESEARCH	\$315,937	\$3,828,987	\$4,144,924
<u>TOTAL NATIONAL SCIENCE FOUNDATION</u>		<u>\$1,134,390</u>	<u>\$3,828,987</u>	<u>\$4,963,377</u>
<u>SMALL BUSINESS ADMINISTRATION</u>				
59.037	SMALL BUSINESS DEVELOPMENT CENTERS	\$716,395	\$0	\$716,395
59.061	STATE TRADE EXPANSION	\$9,755	\$119,827	\$129,582
59.064	ENTREPRENEURIAL DEVELOPMENT DISASTER ASSISTANCE (DISASTER RELIEF APPROPRIATIONS ACT)	\$37,782	\$0	\$37,782
<u>TOTAL SMALL BUSINESS ADMINISTRATION</u>		<u>\$763,932</u>	<u>\$119,827</u>	<u>\$883,759</u>
<u>DEPARTMENT OF VETERANS AFFAIRS</u>				
64.015	VETERANS STATE NURSING HOME CARE	\$7,624,297	\$0	\$7,624,297
64.028	POST-9/11 VETERANS EDUCATIONAL ASSISTANCE	\$260,862	\$0	\$260,862
64.124	ALL-VOLUNTEER FORCE EDUCATIONAL ASSISTANCE	\$146,115	\$0	\$146,115
64.203	VETERANS CEMETERY GRANTS PROGRAM	\$126,040	\$0	\$126,040
IPA	GEOGRAPHICAL DIFFERENCES IN PREVENTABLE HOSPITALIZATIONS AMONG VETERANS WITH DIABETES	\$26,955	\$0	\$26,955
<u>TOTAL DEPARTMENT OF VETERANS AFFAIRS</u>		<u>\$8,184,269</u>	<u>\$0</u>	<u>\$8,184,269</u>
<u>ENVIRONMENTAL PROTECTION AGENCY</u>				
66.001	AIR POLLUTION CONTROL PROGRAM SUPPORT	\$1,521,643	\$0	\$1,521,643
66.032	STATE INDOOR RADON GRANTS	\$92,276	\$66,525	\$158,801
66.034	SURVEYS, STUDIES, RESEARCH, INVESTIGATIONS, DEMONSTRATIONS, AND SPECIAL PURPOSE ACTIVITIES RELATING TO THE CLEAN AIR ACT	\$399,156	\$0	\$399,156
66.202	CONGRESSIONALLY MANDATED PROJECTS	\$1,544	\$0	\$1,544
66.204	MULTIPURPOSE GRANTS TO STATES AND TRIBES	\$105,202	\$0	\$105,202
66.419	WATER POLLUTION CONTROL STATE, INTERSTATE, AND TRIBAL PROGRAM SUPPORT	\$2,111,984	\$0	\$2,111,984
66.432	STATE PUBLIC WATER SYSTEM SUPERVISION	\$626,184	\$0	\$626,184
66.433	STATE UNDERGROUND WATER SOURCE PROTECTION	\$132,326	\$0	\$132,326
66.454	WATER QUALITY MANAGEMENT PLANNING	\$140,281	\$97,978	\$238,259
66.458	CAPITALIZATION GRANTS FOR CLEAN WATER STATE REVOLVING FUNDS AND CLEAN WATER STATE REVOLVING FUND CLUSTER	\$0	\$20,829,000	\$20,829,000
66.460	NONPOINT SOURCE IMPLEMENTATION GRANTS	\$871,491	\$983,898	\$1,855,389
66.461	REGIONAL WETLAND PROGRAM DEVELOPMENT GRANTS	\$157,676	\$0	\$157,676
66.466	CHESAPEAKE BAY PROGRAM	\$1,670,709	\$394,054	\$2,064,763
66.468	CAPITALIZATION GRANTS FOR DRINKING WATER STATE REVOLVING FUNDS AND DRINKING WATER STATE REVOLVING FUND CLUSTER	\$2,082,573	\$230,127	\$2,312,700
66.605	PERFORMANCE PARTNERSHIP GRANTS	\$343,301	\$0	\$343,301
66.608	ENVIRONMENTAL INFORMATION EXCHANGE NETWORK GRANT PROGRAM AND RELATED ASSISTANCE	\$848	\$0	\$848
66.701	TOXIC SUBSTANCES COMPLIANCE MONITORING COOPERATIVE AGREEMENTS	\$137,336	\$0	\$137,336
66.707	TSCA TITLE IV STATE LEAD GRANTS CERTIFICATION OF LEAD-BASED PAINT PROFESSIONALS	\$162,575	\$0	\$162,575
66.708	POLLUTION PREVENTION GRANTS PROGRAM	\$23,629	\$0	\$23,629
66.801	HAZARDOUS WASTE MANAGEMENT STATE PROGRAM SUPPORT	\$2,671,939	\$0	\$2,671,939

**STATE OF WEST VIRGINIA  
SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS  
FEDERAL GRANTOR LISTING  
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FEDERAL CFDA / GRANT/ CONTRACT NUMBER	NAME OF PROGRAM	STATE OF WEST VIRGINIA EXPENDITURES	TOTAL SUBRECIPIENT EXPENDITURES	TOTAL FEDERAL EXPENDITURES
66.802	SUPERFUND STATE, POLITICAL SUBDIVISION, AND INDIAN TRIBE SITE-SPECIFIC COOPERATIVE AGREEMENTS	\$277,232	\$0	\$277,232
66.804	UNDERGROUND STORAGE TANK PREVENTION, DETECTION AND COMPLIANCE PROGRAM	\$637,444	\$0	\$637,444
66.805	LEAKING UNDERGROUND STORAGE TANK TRUST FUND CORRECTIVE ACTION PROGRAM	\$777,550	\$0	\$777,550
66.809	SUPERFUND STATE AND INDIAN TRIBE CORE PROGRAM COOPERATIVE AGREEMENTS	\$206,813	\$0	\$206,813
66.818	BROWNFIELD ASSESSMENT AND CLEANUP COOPERATIVE AGREEMENTS	\$188,807	\$0	\$188,807
DEPMISCFED01	MISC. FEDERAL AWARD PROGRAMS	(\$1,089,257)	\$0	(\$1,089,257)
<u>ENVIRONMENTAL PROTECTION AGENCY</u>		<b>\$14,251,262</b>	<b>\$22,601,582</b>	<b>\$36,852,844</b>
<u>DEPARTMENT OF ENERGY</u>				
81.041	STATE ENERGY PROGRAM	\$441,324	\$59,095	\$500,419
81.042	WEATHERIZATION ASSISTANCE FOR LOW-INCOME PERSONS	\$373,805	\$2,598,375	\$2,972,180
81.057	UNIVERSITY COAL RESEARCH	\$78,642	\$0	\$78,642
81.086	CONSERVATION RESEARCH AND DEVELOPMENT	\$14,907	\$0	\$14,907
81.089***	FOSSIL ENERGY RESEARCH AND DEVELOPMENT (NOTE 3) ENERGY EFFICIENCY AND RENEWABLE ENERGY INFORMATION DISSEMINATION, OUTREACH, TRAINING AND TECHNICAL ANALYSIS/ASSISTANCE	\$71,149	\$0	\$71,149
81.117	ANALYSIS/ASSISTANCE	\$350,171	\$0	\$350,171
CONTRACT 188074	VOLUNTARY SECURITY ENHANCEMENTS AND MAINTENANCE	\$60,358	\$0	\$60,358
OIL	PETROLEUM VIOLATION ESCROW FUNDS	\$34,737	\$15,199	\$49,936
<u>TOTAL DEPARTMENT OF ENERGY</u>		<b>\$1,425,093</b>	<b>\$2,672,669</b>	<b>\$4,097,762</b>
<u>DEPARTMENT OF EDUCATION</u>				
84.002	ADULT EDUCATION - BASIC GRANTS TO STATES	\$403,708	\$2,820,626	\$3,224,334
84.007**	FEDERAL SUPPLEMENTAL EDUCATIONAL OPPORTUNITY GRANTS (FSEOG)	\$3,712,211	\$0	\$3,712,211
84.010	TITLE I GRANTS TO LOCAL EDUCATIONAL AGENCIES	\$698,687	\$86,872,605	\$87,571,292
84.013	TITLE I STATE AGENCY PROGRAM FOR NEGLECTED AND DELINQUENT CHILDREN AND YOUTH	\$1,415,648	\$0	\$1,415,648
84.031	HIGHER EDUCATION-INSTITUTIONAL AID	\$3,652,641	\$0	\$3,652,641
84.033**	FEDERAL WORK-STUDY PROGRAM (FWS)	\$3,703,424	\$0	\$3,703,424
84.038**	FEDERAL PERKINS LOAN (FPL) - FEDERAL CAPITAL CONTRIBUTIONS	\$48,084,820	\$0	\$48,084,820
84.048	CAREER AND TECHNICAL EDUCATION-BASIC GRANTS TO STATES	\$2,892,068	\$5,036,852	\$7,928,920
84.063**	FEDERAL PELL GRANT PROGRAM (PELL)	\$111,523,092	\$0	\$111,523,092
84.083	WOMEN'S EDUCATIONAL EQUITY ACT PROGRAM	\$5,291	\$0	\$5,291
84.126	REHABILITATION SERVICES-VOCATIONAL REHABILITATION GRANTS TO STATES	\$35,999,729	\$4,424,372	\$40,424,101
84.169	INDEPENDENT LIVING-STATE GRANTS	\$0	\$88,731	\$88,731
84.177	INDEPENDENT LIVING SERVICES FOR OLDER INDIVIDUALS WHO ARE BLIND	\$243,760	\$0	\$243,760
84.181	SPECIAL EDUCATION - GRANTS FOR INFANTS AND FAMILIES SUPPORTED EMPLOYMENT SERVICES FOR INDIVIDUALS WITH THE MOST SIGNIFICANT DISABILITIES	\$1,712,552	\$538,219	\$2,250,771
84.187	EDUCATION FOR HOMELESS CHILDREN AND YOUTH	\$150,000	\$0	\$150,000
84.196	FEDERAL DIRECT STUDENT LOANS	\$70,898	\$336,765	\$407,663
84.268**		\$464,565,207	\$0	\$464,565,207
84.287	TWENTY-FIRST CENTURY COMMUNITY LEARNING CENTERS SPECIAL EDUCATION-TECHNICAL ASSISTANCE AND DISSEMINATION TO IMPROVE SERVICES AND RESULTS FOR CHILDREN WITH DISABILITIES	\$267,431	\$6,535,790	\$6,803,221
84.326	ADVANCED PLACEMENT PROGRAM (ADVANCED PLACEMENT TEST FEE; ADVANCED PLACEMENT INCENTIVE PROGRAM GRANTS)	\$122,897	\$1,443	\$124,340
84.330	GAINING EARLY AWARENESS AND READINESS FOR UNDERGRADUATE PROGRAMS	\$10,000	\$0	\$10,000
84.334	CHILD CARE ACCESS MEANS PARENTS IN SCHOOL	\$1,736,797	\$1,155,029	\$2,891,826
84.335	RURAL EDUCATION	\$132,646	\$0	\$132,646
84.358	ENGLISH LANGUAGE ACQUISITION STATE GRANTS	\$132,608	\$2,218,883	\$2,351,491
84.365	MATHEMATICS AND SCIENCE PARTNERSHIPS	\$147,648	\$476,256	\$623,904
84.366	SUPPORTING EFFECTIVE INSTRUCTION STATE GRANT	\$467,193	\$304,221	\$771,414
84.367	GRANTS FOR STATE ASSESSMENTS AND RELATED ACTIVITIES	\$435,988	\$18,823,438	\$19,259,426
84.369	STATEWIDE LONGITUDINAL DATA SYSTEMS	\$2,693,438	\$0	\$2,693,438
84.372	NATIONAL SCIENCE AND MATHEMATICS ACCESS TO RETAIN TALENT (SMART) GRANTS (SMART GRANTS)	\$124,528	\$0	\$124,528
84.376	SCHOOL IMPROVEMENT GRANTS	\$43,627	\$0	\$43,627
84.377	COLLEGE ACCESS CHALLENGE GRANT PROGRAM	\$31,340	\$1,531,521	\$1,562,861
84.378		\$442,535	\$0	\$442,535



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84.379**	TEACHER EDUCATION ASSISTANCE FOR COLLEGE AND HIGHER EDUCATION GRANTS (TEACH GRANTS)	\$538,063	\$0	\$538,063
<b>SPECIAL EDUCATION CLUSTER (IDEA)</b>				
84.027	SPECIAL EDUCATION-GRANTS TO STATES (IDEA, PART B)	\$5,484,014	\$67,248,487	\$72,732,501
84.173	SPECIAL EDUCATION-PRESCHOOL GRANTS (IDEA PRESCHOOL)	\$255,414	\$2,840,748	\$3,096,162
<b>TOTAL SPECIAL EDUCATION CLUSTER (IDEA)</b>		<b>\$5,739,428</b>	<b>\$70,089,235</b>	<b>\$75,828,663</b>
<b>TRIO CLUSTER</b>				
84.042	TRIO-STUDENT SUPPORT SERVICES	\$1,402,664	\$0	\$1,402,664
84.044	TRIO-TALENT SEARCH	\$252,276	\$0	\$252,276
84.047	TRIO-UPWARD BOUND	\$1,876,363	\$0	\$1,876,363
84.066	TRIO-EDUCATIONAL OPPORTUNITY CENTERS	\$228,395	\$0	\$228,395
84.217	TRIO-MCNAIR POST-BACCALAUREATE ACHIEVEMENT	\$508,421	\$0	\$508,421
<b>TOTAL TRIO CLUSTER</b>		<b>\$4,268,119</b>	<b>\$0</b>	<b>\$4,268,119</b>
C013764E	AHE APPALACHIAN REGIONAL	\$1,526	\$0	\$1,526
ED-03-CO-0058	PERFORMANCE BASED DATA MANAGEMENT INITIATIVE	\$65,613	\$0	\$65,613
ED-IES-14-C-NAEP 2014	NATIONAL ASSESSMENT OF EDUCATIONAL PROGRESS	\$130,935	\$0	\$130,935
<b>TOTAL DEPARTMENT OF EDUCATION</b>		<b>\$696,366,096</b>	<b>\$201,253,986</b>	<b>\$897,620,082</b>
<b>ELECTION ASSISTANCE COMMISSION</b>				
90.401	HELP AMERICA VOTE ACT REQUIREMENTS PAYMENTS	\$262,379	\$0	\$262,379
<b>TOTAL ELECTION ASSISTANCE COMMISSION</b>		<b>\$262,379</b>	<b>\$0</b>	<b>\$262,379</b>
<b>DEPARTMENT OF HEALTH AND HUMAN SERVICES</b>				
93.041	SPECIAL PROGRAMS FOR THE AGING-TITLE VII, CHAPTER 3- PROGRAMS FOR PREVENTION OF ELDER ABUSE, NEGLECT, AND EXPLOITATION	\$9,829	\$5,091	\$14,920
93.042	SPECIAL PROGRAMS FOR THE AGING-TITLE VII, CHAPTER 2-LONG TERM CARE OMBUDSMAN SERVICES FOR OLDER INDIVIDUALS	\$91,625	\$4,578	\$96,203
93.043	SPECIAL PROGRAMS FOR THE AGING-TITLE III, PART D-DISEASE PREVENTION AND HEALTH PROMOTION SERVICES	\$28,476	\$141,784	\$170,260
93.048	SPECIAL PROGRAMS FOR THE AGING-TITLE IV AND TITLE II - DISCRETIONARY PROJECTS	\$57,726	\$54,000	\$111,726
93.051	ALZHEIMER'S DISEASE DEMONSTRATION GRANTS TO STATES	\$29,414	\$35,000	\$64,414
93.052	NATIONAL FAMILY CAREGIVER SUPPORT, TITLE III, PART E	\$13,760	\$941,359	\$955,119
93.069	PUBLIC HEALTH EMERGENCY PREPAREDNESS	\$72,686	\$0	\$72,686
93.070	ENVIRONMENTAL PUBLIC HEALTH AND EMERGENCY RESPONSE	\$63,471	\$0	\$63,471
93.071	MEDICARE ENROLLMENT ASSISTANCE PROGRAM	\$1,413	\$157,961	\$159,374
93.073	BIRTH DEFECTS AND DEVELOPMENTAL DISABILITIES - PREVENTION AND SURVEILLANCE	\$50,611	\$0	\$50,611
93.074	HOSPITAL PREPAREDNESS PROGRAM (HPP) AND PUBLIC HEALTH EMERGENCY PREPAREDNESS (PHEP) ALIGNED COOPERATIVE AGREEMENTS	\$2,828,405	\$3,974,424	\$6,802,829
93.079	COOPERATIVE AGREEMENTS TO PROMOTE ADOLESCENT HEALTH THROUGH SCHOOL-BASED HIV/STD PREVENTION AND SCHOOL-BASED SURVEILLANCE	\$74,469	\$510	\$74,979
93.090	GUARDIANSHIP ASSISTANCE	\$1,066,694	\$0	\$1,066,694
93.092	AFFORDABLE CARE ACT (ACA) PERSONAL RESPONSIBILITY EDUCATION PROGRAM	\$13,060	\$199,589	\$212,649
93.094	WELL-INTEGRATED SCREENING AND EVALUATION FOR WOMEN ACROSS THE NATION	\$290,308	\$128,568	\$418,876
93.103	FOOD AND DRUG ADMINISTRATION-RESEARCH	\$826,554	\$0	\$826,554
93.110	MATERNAL AND CHILD HEALTH FEDERAL CONSOLIDATED PROGRAMS PROJECT GRANTS AND COOPERATIVE AGREEMENTS FOR	\$102,526	\$166,200	\$268,726
93.116	TUBERCULOSIS CONTROL PROGRAMS	\$158,497	\$0	\$158,497
93.127	EMERGENCY MEDICAL SERVICES FOR CHILDREN	\$117,041	\$14,397	\$131,438
93.130	COOPERATIVE AGREEMENTS TO STATES/TERRITORIES FOR THE COORDINATION AND DEVELOPMENT OF PRIMARY CARE OFFICES	\$72,754	\$100,000	\$172,754
93.136	INJURY PREVENTION AND CONTROL RESEARCH AND STATE AND COMMUNITY BASED PROGRAMS	\$56,287	\$696,070	\$752,357
93.150	PROJECTS FOR ASSISTANCE IN TRANSITION FROM HOMELESSNESS (PATH)	\$1,851	\$294,352	\$296,203
93.165	GRANTS TO STATES FOR LOAN REPAYMENT PROGRAM	\$0	\$130,000	\$130,000
93.217	FAMILY PLANNING-SERVICES	\$2,229,903	\$0	\$2,229,903



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93.234	TRAUMATIC BRAIN INJURY STATE DEMONSTRATION GRANT PROGRAM	\$235,523	\$0	\$235,523
93.235	AFFORDABLE CARE ACT (ACA) ABSTINENCE EDUCATION PROGRAM GRANTS TO STATES TO SUPPORT ORAL HEALTH WORKFORCE	\$3,696	\$295,781	\$299,477
93.236	ACTIVITIES	\$83,490	\$583,476	\$666,966
93.241	STATE RURAL HOSPITAL FLEXIBILITY PROGRAM SUBSTANCE ABUSE AND MENTAL HEALTH SERVICES_PROJECTS OF	\$151,361	\$450,670	\$602,031
93.243	REGIONAL AND NATIONAL SIGNIFICANCE	\$450,473	\$4,997,742	\$5,448,215
93.251	UNIVERSAL NEWBORN HEARING SCREENING	\$57,201	\$60,568	\$117,769
93.264**	NURSE FACULTY LOAN PROGRAM (NFLP)	\$221,380	\$0	\$221,380
93.268	IMMUNIZATION COOPERATIVE AGREEMENTS	\$433,914	\$220,824	\$654,738
93.270	VIRAL HEPATITIS PREVENTION AND CONTROL CENTERS FOR DISEASE CONTROL AND PREVENTION_INVESTIGATIONS	\$71,058	\$0	\$71,058
93.283	AND TECHNICAL ASSISTANCE	\$2,431,076	\$498,690	\$2,929,766
93.301	SMALL RURAL HOSPITAL IMPROVEMENT GRANT PROGRAM	\$0	\$267,205	\$267,205
93.305	NATIONAL STATE BASED TOBACCO CONTROL PROGRAMS OUTREACH PROGRAMS TO REDUCE THE PREVALENCE OF OBESITY IN	\$716,036	\$234,414	\$950,450
93.319	HIGH RISK RURAL AREAS EPIDEMIOLOGY AND LABORATORY CAPACITY FOR INFECTIOUS	\$463,438	\$0	\$463,438
93.323	DISEASES (ELC)	\$1,013,208	\$0	\$1,013,208
93.324	STATE HEALTH INSURANCE ASSISTANCE PROGRAM	\$22,278	\$0	\$22,278
93.336	BEHAVIORAL RISK FACTOR SURVEILLANCE SYSTEM HEALTH PROFESSIONS STUDENT LOANS, INCLUDING PRIMARY CARE	(\$64,029)	\$0	(\$64,029)
93.342**	LOANS AND LOANS FOR DISADVANTAGED STUDENTS (HPSL/PCL/LDS)	\$6,740,538	\$0	\$6,740,538
93.359	NURSE EDUCATION, PRACTICE QUALITY AND RETENTION GRANTS	\$457,041	\$0	\$457,041
93.364**	NURSING STUDENT LOANS (NSL)	\$714,507	\$0	\$714,507
93.389***	NATIONAL CENTER FOR RESEARCH RESOURCES	\$17,273	\$0	\$17,273
93.393***	CANCER CAUSE AND PREVENTION RESEARCH NON-ACA/PPHF - BUILDING CAPACITY OF THE PUBLIC HEALTH SYSTEM	\$1,758	\$0	\$1,758
93.424	TO IMPROVE POPULATION HEALTH THROUGH NATIONAL NONPROFIT ORGANIZATIONS	\$18,008	\$0	\$18,008
93.506	ACA NATIONWIDE PROGRAM FOR NATIONAL AND STATE BACKGROUND CHECKS FOR DIRECT PATIENT ACCESS EMPLOYEES OF LONG TERM CARE FACILITIES AND PROVIDERS	\$842,800	\$5,063	\$847,863
93.511	AFFORDABLE CARE ACT (ACA) GRANTS TO STATES FOR HEALTH INSURANCE PREMIUM REVIEW	\$83,935	\$0	\$83,935
93.521	THE AFFORDABLE CARE ACT: BUILDING EPIDEMIOLOGY, LABORATORY, AND HEALTH INFORMATION SYSTEMS CAPACITY IN THE EPIDEMIOLOGY AND LABORATORY CAPACITY FOR INFECTIOUS DISEASE (ELC) AND EMERGING INFECTIONS PROGRAM (EIP)	\$370,057	\$201,944	\$572,001
93.524	COOPERATIVE AGREEMENTS;PPHF BUILDING CAPACITY OF THE PUBLIC HEALTH SYSTEM TO IMPROVE POPULATION HEALTH THROUGH NATIONAL, NON-PROFIT ORGANIZATIONS- FINANCED IN PART BY PREVENTION AND PUBLIC PPHF CAPACITY BUILDING ASSISTANCE TO STRENGTHEN PUBLIC HEALTH IMMUNIZATION INFRASTRUCTURE AND PERFORMANCE	\$1,000	\$15,000	\$16,000
93.539	FINANCED IN PART BY PREVENTION AND PUBLIC HEALTH FUNDS	\$628,246	\$569,417	\$1,197,663
93.556	PROMOTING SAFE AND STABLE FAMILIES TEMPORARY ASSISTANCE FOR NEEDY FAMILIES (TANF) STATE PROGRAMS AND TANF CLUSTER	\$1,263,289	\$690,215	\$1,953,504
93.558	PROGRAMS AND TANF CLUSTER	\$67,967,578	\$9,823,884	\$77,791,462
93.560	FAMILY SUPPORT PAYMENTS TO STATES-ASSISTANCE PAYMENTS	\$44,742	\$0	\$44,742
93.563	CHILD SUPPORT ENFORCEMENT REFUGEE AND ENTRANT ASSISTANCE-STATE ADMINISTERED PROGRAMS	\$26,562,832	\$0	\$26,562,832
93.566	PROGRAMS	\$4,188	\$75,000	\$79,188
93.568	LOW-INCOME HOME ENERGY ASSISTANCE	\$23,117,457	\$5,286,218	\$28,403,675
93.569	COMMUNITY SERVICES BLOCK GRANTS	\$396,317	\$7,669,266	\$8,065,583
93.586	STATE COURT IMPROVEMENT PROGRAM	\$260,826	\$0	\$260,826
93.590	COMMUNITY-BASED CHILD ABUSE PREVENTION GRANTS	\$0	\$245,196	\$245,196
93.597	GRANTS TO STATES FOR ACCESS AND VISITATION PROGRAMS	\$87,528	\$0	\$87,528
93.599	CHAFEE EDUCATION AND TRAINING VOUCHERS PROGRAM (ETV)	\$699,649	\$16,990	\$716,639
93.600	HEAD START	\$28,159	\$77,067	\$105,226
93.603	ADOPTION AND LEGAL GUARDIANSHIP INCENTIVE PAYMENTS	\$4,205,511	\$233,544	\$4,439,055
93.609	THE AFFORDABLE CARE ACT - MEDICAID ADULT QUALITY GRANTS ACA - STATE INNOVATION MODELS: FUNDING FOR MODEL DESIGN AND	\$330,071	\$0	\$330,071
93.624	MODEL TESTING ASSISTANCE DEVELOPMENTAL DISABILITIES BASIC SUPPORT AND ADVOCACY GRANTS	\$546,581	\$2,819	\$549,400
93.630	GRANTS	\$211,964	\$348,060	\$560,024
93.643	CHILDREN'S JUSTICE GRANTS TO STATES	\$124,660	\$0	\$124,660
93.645	STEPHANIE TUBBS JONES CHILD WELFARE SERVICES PROGRAM	\$2,103,762	\$0	\$2,103,762

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93.658	FOSTER CARE-TITLE IV-E	\$45,031,327	\$3,802,653	\$48,833,980
93.659	ADOPTION ASSISTANCE	\$39,687,324	\$0	\$39,687,324
93.667	SOCIAL SERVICES BLOCK GRANT	\$20,109,058	\$0	\$20,109,058
93.669	CHILD ABUSE AND NEGLECT STATE GRANTS FAMILY VIOLENCE PREVENTION AND SERVICES/DOMESTIC VIOLENCE	\$0	\$115,981	\$115,981
93.671	SHELTER AND SUPPORTIVE SERVICES	\$1,552	\$953,209	\$954,761
93.674	CHAFEE FOSTER CARE INDEPENDENCE PROGRAM	\$1,242,722	\$775,913	\$2,018,635
93.701***	ARRA - TRANS-NIH RECOVERY ACT RESEARCH SUPPORT (NOTE 3) CAPACITY BUILDING ASSISTANCE TO STRENGTHEN PUBLIC HEALTH IMMUNIZATION INFRASTRUCTURE AND PERFORMANCE - FINANCED IN PART BY THE PREVENTION AND PUBLIC HEALTH FUND (PPHF)	\$2,000	\$0	\$2,000
93.733	STATE PUBLIC HEALTH APPROACHES FOR ENSURING QUITLINE CAPACITY - FUNDED IN PART BY PREVENTION AND PUBLIC HEALTH FUNDS (PPHF)	\$542,367	\$0	\$542,367
93.735	PPHF: HEALTH CARE SURVEILLANCE/HEALTH STATISTICS- SURVEILLANCE PROGRAM ANNOUNCEMENT: BEHAVIORAL RISK FACTOR SURVEILLANCE SYSTEM FINANCED IN PART BY PREVENTION AND PUBLIC HEALTH FUNDS (PPHF)	\$153,040	\$0	\$153,040
93.745	PPHF COOPERATIVE AGREEMENTS FOR PRESCRIPTION DRUG MONITORING PROGRAM ELECTRONIC HEALTH RECORD (HER)	\$148,660	\$0	\$148,660
93.748	INTEGRATION AND INTEROPERABILITY EXPANSION CHILD LEAD POISONING PREVENTION SURVEILLANCE FINANCED IN PART BY PREVENTION AND PUBLIC HEALTH (PPHF) PROGRAM	\$160,291	\$50,000	\$210,291
93.753	STATE AND LOCAL PUBLIC HEALTH ACTIONS TO PREVENT OBESITY, DIABETES, HEART DISEASE, AND STROKE (PPHF)	\$160,276	\$0	\$160,276
93.757	PREVENTIVE HEALTH AND HEALTH SERVICES BLOCK GRANT FUNDED SOLELY WITH PREVENTION AND PUBLIC HEALTH FUNDS (PPHF)	\$609,344	\$251,169	\$860,513
93.758	CHILDREN'S HEALTH INSURANCE PROGRAM	\$656,547	\$763,464	\$1,420,011
93.767	CENTERS FOR MEDICARE AND MEDICAID SERVICES (CMS) RESEARCH, DEMONSTRATIONS AND EVALUATIONS	\$63,015,483	\$0	\$63,015,483
93.779	MONEY FOLLOWS THE PERSON REBALANCING DEMONSTRATION ORGANIZED APPROACHES TO INCREASE COLORECTAL CANCER SCREENING	\$78,440	\$342,590	\$421,030
93.791	HOSPITAL PREPAREDNESS PROGRAM (HPP) EBOLA PREPAREDNESS AND RESPONSE ACTIVITIES	\$1,700,810	\$882,605	\$2,583,415
93.800	LABORATORY CAPACITY FOR INFECTIOUS DISEASES (ELC) HOSPITAL PREPAREDNESS PROGRAM (HPP) EBOLA PREPAREDNESS	\$569,668	\$0	\$569,668
93.815	ALLERGY AND INFECTIOUS DISEASES RESEARCH	\$258,924	\$0	\$258,924
93.817	BIOMEDICAL RESEARCH AND RESEARCH TRAINING (NOTE 3) GRANTS TO STATES FOR OPERATION OF STATE OFFICES OF RURAL HEALTH	\$0	\$120,680	\$120,680
93.855***		(\$2,514)	\$0	(\$2,514)
93.859***		\$670,541	\$0	\$670,541
93.913	HIV CARE FORMULA GRANTS	\$145,447	\$0	\$145,447
93.917	SCHOLARSHIPS FOR HEALTH PROFESSIONS STUDENTS FROM DISADVANTAGED BACKGROUNDS - SCHOLARSHIPS FOR DISADVANTAGED STUDENTS (SDS)	\$4,165,848	\$1,521,192	\$5,687,040
93.925**	HIV PREVENTION ACTIVITIES-HEALTH DEPARTMENT BASED HUMAN IMMUNODEFICIENCY VIRUS (HIV)/ACQUIRED	\$650,000	\$0	\$650,000
93.940	IMMUNODEFICIENCY VIRUS SYNDROME (AIDS) SURVEILLANCE ASSISTANCE PROGRAMS FOR CHRONIC DISEASE PREVENTION AND CONTROL	\$651,738	\$84,956	\$736,694
93.944	COOPERATIVE AGREEMENTS TO SUPPORT STATE-BASED SAFE MOTHERHOOD AND INFANT HEALTH INITIATIVE PROGRAMS	\$179,718	\$0	\$179,718
93.945	BLOCK GRANTS FOR COMMUNITY MENTAL HEALTH SERVICES BLOCK GRANTS FOR PREVENTION AND TREATMENT OF SUBSTANCE ABUSE	\$2,864	\$0	\$2,864
93.946	COAL MINERS RESPIRATORY IMPAIRMENT TREATMENT CLINICS AND SERVICES	\$93,740	\$0	\$93,740
93.958	SEXUALLY TRANSMITTED DISEASES (STD) PREVENTION AND CONTROL GRANTS	\$261,600	\$2,254,223	\$2,515,823
93.959	MENTAL HEALTH DISASTER ASSISTANCE AND EMERGENCY MENTAL HEALTH	\$248,844	\$7,367,625	\$7,616,469
93.965	MATERNAL AND CHILD HEALTH SERVICES BLOCK GRANT TO THE STATES	\$139,551	\$950,031	\$1,089,582
93.977		\$521,216	\$0	\$521,216
93.982		\$0	\$180,309	\$180,309
93.994		\$3,050,746	\$2,672,793	\$5,723,539
<b>AGING CLUSTER</b>				
93.044	SPECIAL PROGRAMS FOR THE AGING-TITLE III, PART B-GRANTS FOR SUPPORTIVE SERVICES AND SENIOR CENTERS	\$239,792	\$2,208,990	\$2,448,782

STATE OF WEST VIRGINIA  
SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS  
FEDERAL GRANTOR LISTING  
FOR THE YEAR ENDING JUNE 30, 2017

FEDERAL CFDA / GRANT/ CONTRACT NUMBER	NAME OF PROGRAM	STATE OF WEST VIRGINIA EXPENDITURES	TOTAL SUBRECIPIENT EXPENDITURES	TOTAL FEDERAL EXPENDITURES
93.045	SPECIAL PROGRAMS FOR THE AGING-TITLE III, PART C-NUTRITION SERVICES	\$135,961	\$4,718,014	\$4,853,975
93.053	NUTRITION SERVICES INCENTIVE PROGRAM	\$0	\$1,934,763	\$1,934,763
	<b>TOTAL AGING CLUSTER</b>	<b>\$375,753</b>	<b>\$8,861,767</b>	<b>\$9,237,520</b>
	<b><u>MATERNAL, INFANT, AND EARLY CHILDHOOD HOME VISITING CLUSTER</u></b>			
93.505	AFFORDABLE CARE ACT (ACA) MATERNAL, INFANT, AND EARLY CHILDHOOD HOME VISITING PROGRAM	\$120,695	\$5,573,916	\$5,694,611
93.870	MATERNAL, INFANT AND EARLY CHILDHOOD HOME VISITING GRANT PROGRAM	\$323,935	\$1,588,642	\$1,912,577
	<b>TOTAL MATERNAL, INFANT, AND EARLY CHILDHOOD HOME VISITING CLUSTER</b>	<b>\$444,630</b>	<b>\$7,162,558</b>	<b>\$7,607,188</b>
	<b><u>CCDF CLUSTER</u></b>			
93.575	CHILD CARE AND DEVELOPMENT BLOCK GRANT	\$11,461,177	\$9,381,691	\$20,842,868
93.596	CHILD CARE MANDATORY AND MATCHING FUNDS OF THE CHILD CARE AND DEVELOPMENT FUND	\$13,350,527	\$1,792,901	\$15,143,428
	<b>TOTAL CCDF CLUSTER</b>	<b>\$24,811,704</b>	<b>\$11,174,592</b>	<b>\$35,986,296</b>
	<b><u>MEDICAID CLUSTER</u></b>			
93.775	STATE MEDICAID FRAUD CONTROL UNITS	\$871,511	\$0	\$871,511
93.777	STATE SURVEY AND CERTIFICATION OF HEALTH CARE PROVIDERS AND SUPPLIERS (TITLE XVIII) MEDICARE	\$3,819,939	\$0	\$3,819,939
93.778	MEDICAL ASSISTANCE PROGRAM	\$3,200,937,264	\$1,668,778	\$3,202,606,042
ARRA 93.778	ARRA - MEDICAL ASSISTANCE PROGRAM	\$5,056,712	\$0	\$5,056,712
	<b>TOTAL MEDICAID CLUSTER</b>	<b>\$3,210,685,426</b>	<b>\$1,668,778</b>	<b>\$3,212,354,204</b>
050805WV5002	WAIVED LABS	\$4,838	\$0	\$4,838
0805WV5002	CLINICAL LABORATORY IMPROVEMENT AMENDMENTS	\$111,576	\$0	\$111,576
12IPA1213312	NIOSH ASSIGNMENT - COORDINATOR, HEALTHCARE & SOCIAL ASSISTANCE SECTOR	\$875	\$0	\$875
14FED1418075 M01	PTD BUSINESS CASE (IPA ASSIGNMENT)	\$8,354	\$0	\$8,354
14FED1418109 -				
IPA1418109 Total	MODELING OF NANOTOXICOLOGY DATA	\$17,858	\$0	\$17,858
200-2011-M-3923	NTDI EY2010	\$71,467	\$0	\$71,467
20020507251	VITAL STATISTICS COOP PROGRAM	\$147,202	\$0	\$147,202
200540049P	FOOD INSPECTIONS	\$36,222	\$0	\$36,222
223024448	MAMMOGRAPHY QUALITY ACT	\$65,632	\$0	\$65,632
5500066056	DEATH RECORDS	\$58	\$0	\$58
9179393	TOBACCO WORKPLAN	\$671,035	\$0	\$671,035
HHS-N-285-2005-23641C	CHRONIC MIGRAINE TREATMENT TRIAL (CMTT) STUDY	\$12,229	\$0	\$12,229
HHSP23320074107EC	NATIONAL HEALTH INFORMATION NETWORK II (NHIN2)	\$996,615	\$0	\$996,615
	<b>TOTAL DEPARTMENT OF HEALTH AND HUMAN SERVICES</b>	<b>\$3,575,746,386</b>	<b>\$91,870,024</b>	<b>\$3,667,616,410</b>
	<b><u>CORPORATION FOR NATIONAL AND COMMUNITY SERVICE</u></b>			
94.003	STATE COMMISSIONS	\$215,161	\$0	\$215,161
94.006	AMERICORPS	\$110,842	\$3,569,698	\$3,680,540
94.007	PROGRAM DEVELOPMENT AND INNOVATION GRANTS	\$2,400	\$0	\$2,400
94.009	TRAINING AND TECHNICAL ASSISTANCE	\$66,261	\$0	\$66,261
94.013	VOLUNTEERS IN SERVICE TO AMERICA	\$46,572	\$0	\$46,572
	<b>TOTAL CORPORATION FOR NATIONAL AND COMMUNITY SERVICE</b>	<b>\$441,236</b>	<b>\$3,569,698</b>	<b>\$4,010,934</b>
	<b><u>EXECUTIVE OFFICE OF THE PRESIDENT</u></b>			
95.001	HIGH INTENSITY DRUG TRAFFICKING AREAS PROGRAM (NOTE 3)	\$372,977	\$0	\$372,977
	<b>EXECUTIVE OFFICE OF THE PRESIDENT</b>	<b>\$372,977</b>	<b>\$0</b>	<b>\$372,977</b>
	<b><u>SOCIAL SECURITY ADMINISTRATION</u></b>			
96.001	SOCIAL SECURITY-DISABILITY INSURANCE (DI) AND DISABILITY INSURANCE/SSI CLUSTER	\$20,983,324	\$0	\$20,983,324
96.008	SOCIAL SECURITY - WORK INCENTIVES PLANNING AND ASSISTANCE PROGRAM	\$0	\$257,750	\$257,750
55000660056	DEATH RECORDS	\$43,608	\$0	\$43,608
SS000860067	ENUMERATION AT BIRTH	\$19,137	\$0	\$19,137
	<b>TOTAL SOCIAL SECURITY ADMINISTRATION</b>	<b>\$21,046,069</b>	<b>\$257,750</b>	<b>\$21,303,819</b>

STATE OF WEST VIRGINIA  
SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS  
FEDERAL GRANTOR LISTING  
FOR THE YEAR ENDING JUNE 30, 2017

FEDERAL CFDA / GRANT/ CONTRACT NUMBER	NAME OF PROGRAM	STATE OF WEST VIRGINIA EXPENDITURES	TOTAL SUBRECIPIENT EXPENDITURES	TOTAL FEDERAL EXPENDITURES
<u>DEPARTMENT OF HOMELAND SECURITY</u>				
97.012	BOATING SAFETY FINANCIAL ASSISTANCE COMMUNITY ASSISTANCE PROGRAM STATE SUPPORT SERVICES	\$510,500	\$0	\$510,500
97.023	ELEMENT (CAP-SSSE)	\$38,762	\$0	\$38,762
97.032	CRISIS COUNSELING DISASTER GRANTS - PUBLIC ASSISTANCE (PRESIDENTIALLY DECLARED DISASTERS)	\$0	\$303,914	\$303,914
97.036	DECLARED DISASTERS)	\$43,217,193	\$47,006,645	\$90,223,838
97.039	HAZARD MITIGATION GRANT	\$8,916	\$2,281,166	\$2,290,082
97.041	NATIONAL DAM SAFETY PROGRAM	\$78,699	\$0	\$78,699
97.042	EMERGENCY MANAGEMENT PERFORMANCE GRANTS	\$1,982,647	\$840,531	\$2,823,178
97.044	ASSISTANCE TO FIREFIGHTERS GRANT	\$634,050	\$0	\$634,050
97.045	COOPERATING TECHNICAL PARTNERS	\$152,191	\$0	\$152,191
97.047	PRE-DISASTER MITIGATION	\$7,502	\$0	\$7,502
97.056	PORT SECURITY GRANT PROGRAM	\$180,211	\$0	\$180,211
97.067	HOMELAND SECURITY GRANT PROGRAM	\$471,009	\$3,942,563	\$4,413,572
97.088	DISASTER ASSISTANCE PROJECTS	\$0	\$791,126	\$791,126
<u>TOTAL DEPARTMENT OF HOMELAND SECURITY</u>		<u>\$47,281,680</u>	<u>\$55,165,945</u>	<u>\$102,447,625</u>
<u>TOTAL EXPENDITURES OF FEDERAL AWARDS</u>		<u>\$5,888,935,169</u>	<u>\$614,687,752</u>	<u>\$6,503,622,921</u>

\* HIGHWAY PLANNING AND CONSTRUCTION CLUSTER, TOTAL STATE OF WEST VIRGINIA EXPENDITURES \$434,947,722  
TOTAL SUBRECIPIENT EXPENDITURES \$5,568,998 AND TOTAL FEDERAL EXPENDITURES \$440,516,720.

\*\* STUDENT FINANCIAL ASSISTANCE CLUSTER, TOTAL STATE OF WEST VIRGINIA EXPENDITURES \$640,453,242  
TOTAL SUBRECIPIENT EXPENDITURES \$0 AND TOTAL FEDERAL EXPENDITURES \$640,453,242.

\*\*\* RESEARCH AND DEVELOPMENT CLUSTER, TOTAL STATE OF WEST VIRGINIA EXPENDITURES \$5,677,969  
TOTAL SUBRECIPIENT EXPENDITURES \$3,828,987, AND TOTAL FEDERAL EXPENDITURES \$9,506,956.

The accompanying notes are an integral part of this schedule.

**STATE OF WEST VIRGINIA  
NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS  
FOR THE FISCAL YEAR ENDED JUNE 30, 2017**

**NOTE 1. BASIS OF ACCOUNTING**

The Schedule of Expenditures of Federal Awards (the Schedule) has been prepared on the cash basis of accounting. The federal awards are listed in the Schedule under the federal agency supplying the award. The individual Catalog of Federal Domestic Assistance (CFDA) numbers are listed first, then clusters, and then federal contract numbers. Federal contract numbers are used if the CFDA number is not available.

The Schedule includes noncash items such as Food Stamps (CFDA number 10.551), State Administrative Expense for Child Nutrition (CFDA number 10.560), and Donation of Federal Surplus Personal Property (CFDA number 39.003). All items are valued based on amounts as established by the federal grantor agency. The Schedule also includes Federal Direct Student Loans (CFDA number 84.268) that are made directly to individual students.

**NOTE 2. REPORTING ENTITY**

The Schedule includes various departments, agencies, boards and commissions governed by the legislature, judiciary and/or constitutional officers of the State of West Virginia (the State). The reporting entity also includes the State's institutions of public higher education. Certain institutions of higher education within the State maintain separate research corporations. These corporations receive various federal awards for research and development and other programs. Each of the research corporations has a separate audit performed in accordance with the Uniform Guidance, and accordingly, a separate submission has been made (see Note 8).

The Schedule does not include federal funds received and expended by certain independent authorities and other organizations included in the reporting entity under the criteria of the Governmental Accounting Standards Board, as described in Note 1 to the State's basic financial statements published in the Comprehensive Annual Financial Report for the fiscal year ended June 30, 2017. The West Virginia Housing Development Fund and the West Virginia Drinking Water Treatment Revolving Loan Fund, which is a discretely presented component unit and a proprietary fund, respectively, elected to have their own single audit; therefore, their expenditures of federal awards are excluded from the State's schedule of expenditures of federal awards. This component unit and proprietary fund are required to submit their own single audit report to the federal audit clearinghouse (see Note 8).

**STATE OF WEST VIRGINIA  
NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS  
FOR THE FISCAL YEAR ENDED JUNE 30, 2017**

**NOTE 3. INDIRECT/PASS-THROUGH FEDERAL FUNDS**

The United States Office of Drug Control Policy provides funds to the Laurel County Fiscal Court of London, Kentucky. A portion of these funds are passed through from the Fiscal Court to the State with pass-through entity identifying numbers HDTA14, HDTA15, HDTA16, and HDTA17.

The West Virginia Research Corporation passed funds to the West Virginia School of Osteopathic Medicine for CFDA Number 93.859 with pass-through entity identifying numbers 12-303-WVSOM-3, 12-303-WVSOM, and 12-303-WVSOM-4, and also to Shepherd University for CFDA Numbers 43.008 with pass-through entity identifying number 91-175C-SU and for CFDA 93.859 with pass-through entity identifying number 1-058B-SU-6.

The West Virginia Research Corporation, the Battelle Research Institute, and Tetra Tech passed funds to the West Virginia Geological and Economic Survey for CFDA Number 81.089 with pass-through entity identifying numbers 354860, 3377572, 507700, and 1137982.

The Emmes Corporation passed funds to West Virginia University for CFDA Number 93.701 with pass-through entity identifying number 1 U01 NS062835-01A1.

**NOTE 4. UNEMPLOYMENT INSURANCE PROGRAM (UI) (CFDA Number 17.225)**

The U.S. Department of Labor, in consultation with the Office of Management and Budget officials, has determined that for the purpose of audits and reporting under the Uniform Guidance, state UI funds as well as federal funds should be considered federal awards for determining Type A programs. The State receives federal funds for administrative purposes. State unemployment taxes must be deposited to a state account in the Federal Unemployment Trust Fund, used only to pay benefits under the federally approved state law. State UI funds as well as federal funds are included on the Schedule.

**STATE OF WEST VIRGINIA  
NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS  
FOR THE FISCAL YEAR ENDED JUNE 30, 2017**

The following schedule provides a breakdown of the state and federal portions of the total expended under CFDA number 17.225:

	<u>Beginning Balance July 1, 2016 As Adjusted</u>	<u>Receipts</u>	<u>Expenditures</u>	<u>Ending Balance June 30, 2017</u>
State UI Funds	\$ (468,026)	\$373,475,422	\$373,326,781	\$ (319,385)
Federal UI Funds	<u>(1,326)</u>	<u>17,151,484</u>	<u>16,733,060</u>	<u>417,098</u>
Total	<u>\$ (469,352)</u>	<u>\$390,626,906</u>	<u>\$390,059,841</u>	<u>\$ 97,713</u>

**NOTE 5. LOANS OUTSTANDING**

Loans outstanding as of June 30, 2017, with continuing compliance requirements, are as follows:

<u>CFDA Number</u>	<u>Name of Program</u>	<u>Ending Balance</u>
84.038	Federal Perkins Loan (FPL) – Federal Capital Contribution	\$41,318,611
93.264	Nurse Faculty Loan Program (NFLP)	170,015
93.342	Health Professions Student Loans, Including Primary Care Loans and Loans for Disadvantaged Students (HPSL/PCL/LDS)	5,950,556
93.364	Nursing Student Loans (NSL)	<u>633,314</u>
	Total Loans Outstanding	<u>\$48,072,496</u>

**NOTE 6. APPROVED PROJECT WORKSHEETS**

The State incurred eligible expenditures in FY 2016 and the Federal Emergency Management Agency (FEMA) approved the State's project worksheets in FY 2017. The State recorded the eligible expenditures of \$1,980,043 in CFDA 97.036 on this year's SEFA.

**NOTE 7. INDIRECT COST RATE**

Per Uniform Guidance 2 CFR § 200.510(b)(6), agencies are required to disclose whether or not they elect to use the 10 percent de minimis cost rate that 2 CFR § 200.414(f) allows for nonfederal entities that have never received a negotiated indirect cost rate. The State does not elect to use the 10 percent de minimis cost rate.



**STATE OF WEST VIRGINIA  
NOTES TO SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS  
FOR THE FISCAL YEAR ENDED JUNE 30, 2017**

**NOTE 8: COMPONENT UNITS/PROPRIETARY FUND**

The following is a summary of federal awards at the various component units and a proprietary fund that had separate Uniform Guidance audits and submissions. These awards have been excluded from the State's Schedule.

West Virginia University Research Corporation	<u>\$ 91,223,193</u>
Marshall University Research Corporation	<u>\$ 16,902,835</u>
West Virginia State Research Corporation	<u>\$ 11,122,444</u>
West Virginia Housing Development Fund	<u>\$ 186,020,538</u>
West Virginia Drinking Water Treatment Revolving Fund	<u>\$ 5,949,000</u>



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***SCHEDULE OF  
FINDINGS  
AND  
QUESTIONED  
COSTS***

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**STATE OF WEST VIRGINIA  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
for the Year Ended June 30, 2017**

**Section I. Summary of Auditor's Results**

**Financial statements:**

Type of report the auditors issued on whether the financial statements audited were prepared in accordance with GAAP (unmodified, qualified, adverse or disclaimer):	Unmodified, with reference to other auditors
Internal control over financial reporting:	
Material weakness(es) identified?	_____ Yes <u>  X  </u> No
Significant deficiency(ies) identified?	_____ Yes <u>  X  </u> None reported
Noncompliance material to financial statements noted?	_____ Yes <u>  X  </u> No

**Federal awards:**

Internal control over major federal programs:	
Material weakness(es) identified?	<u>  X  </u> Yes    _____ No
Significant deficiency(ies) identified?	<u>  X  </u> Yes    _____ None reported
Type of auditors' report issued on compliance for major federal programs (unmodified, qualified, adverse or disclaimer):	Unmodified for all major programs except for the Supplemental Nutrition Assistance Program (SNAP) Cluster, Rehabilitation Services Vocational Rehabilitation Grants to States, Child Care and Development Fund (CCDF) Cluster, and Adoption Assistance, which were qualified, and the Disaster Grants – Public Assistance (Presidentially Declared Disasters), which was adverse
Any audit findings disclosed that are required to be reported in accordance with 2 CFR 200.516(a)?	_____ <u>  X  </u> Yes    _____ No

**STATE OF WEST VIRGINIA  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
for the Year Ended June 30, 2017**

**Identification of Major Federal Programs:**

CFDA Number(s)	Reportable Findings	Name of Federal Program or Cluster
10.551/10.561	2017-001, 002, 003	Supplemental Nutrition Assistance Program (SNAP) Cluster
17.277	None	WIOA National Dislocated Worker Grants/WIA National Emergency Grants
17.258/17.259/ 17.278	None	Workforce Innovation and Opportunity Act (WIOA) Cluster
84.007/84.033/ 84.038/84.063/ 84.268/84.379/ 93.264/93.342/ 93.364/93.925	2017-004, 005, 006, 007	Student Financial Assistance (SFA) Cluster
84.126	2017-008, 009	Rehabilitation Services Vocational Rehabilitation Grants to States
93.558	2017-002, 003, 010	Temporary Assistance for Needy Families (TANF) Cluster
93.568	2017-002, 003, 011, 012	Low-Income Home Energy Assistance
93.575/93.596	2017-002, 003, 013, 014	Child Care and Development Fund (CCDF) Cluster
93.658	2017-002, 003	Foster Care—Title IV-E
93.659	2017-002, 003, 015	Adoption Assistance
93.767	2017-002, 003	Children’s Health Insurance Program (CHIP)
93.775/93.777/ 93.778*	2017-003, 016	Medicaid Cluster
97.036	2017-017, 018, 019, 020, 021	Disaster Grants – Public Assistance (Presidentially Declared Disasters)

Dollar threshold used to distinguish between Type A and B programs:     \$ 19,510,869

Auditee qualified as low-risk auditee   \_\_\_\_\_ Yes       X   No

\* CFDA number includes federally identifiable American Recovery and Reinvestment Act Funds.

**STATE OF WEST VIRGINIA  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
for the Year Ended June 30, 2017**

**Section II. Financial Statement Findings**

None.

**Section III. Federal Award Findings and Questioned Costs**

<b>Reference Number</b>	<b>Findings</b>	<b>Questioned Costs</b>
2017-001	Special Tests and Provisions – EBT Card Security	N/A
2017-002	DHHR Information System and Related Business Process Controls	N/A
2017-003	Procurement Procedures	\$3,204
2017-004	Schedule of Expenditures of Federal Awards	N/A
2017-005	Special Tests and Provisions – Return of Title IV Funds	\$5,953
2017-006	Special Tests and Provisions – Enrollment Reporting	N/A
2017-007	Special Tests and Provisions – Borrower Data Transmission and Reconciliation	N/A
2017-008	Eligibility	N/A
2017-009	Schedule of Expenditures of Federal Awards	N/A
2017-010	Special Tests and Provisions –Child Support Non-cooperation, Penalty for Refusal to Work, and Adult Custodial Parent of Child Under Six When Child Care Not Available	N/A
2017-011	Allowability and Eligibility	\$665
2017-012	Reporting Documentation	N/A
2017-013	Disaster Recovery Plan	N/A
2017-014	Special Tests and Provisions – Fraud Detection and Repayment	N/A
2017-015	Eligibility Documentation	\$7,530
2017-016	Eligibility	\$102
2017-017	Cash Management	N/A
2017-018	Subrecipient Monitoring	Unknown
2017-019	Schedule of Expenditures of Federal Awards	N/A
2017-020	Internal Controls Over Reporting	N/A
2017-021	Cash Management Monitoring Finding	N/A

**STATE OF WEST VIRGINIA  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
for the Year Ended June 30, 2017**

**2017-001 SPECIAL TESTS AND PROVISIONS – EBT CARD SECURITY**

<b>Federal Program Information:</b>	<b>Federal Agency and Program Name</b>	<b>CFDA #</b>
	U.S. Department of Agriculture Supplemental Nutrition Assistance Program (SNAP) Cluster	10.551/10.561
	Grant Award 1WV400401	
	Grant Award 1WV430459	

**Criteria:** 7 CFR 274.8(b)(3) requires “Performance and technical standards. The State agency shall ensure that EBT systems comply with POS technical standards established by the American National Standards Institute (ANSI) or International Organization for Standardization (ISO) where applicable. This includes the draft EBT ISO 8583 Processor Interface Technical Specifications contained in the ANSI standards, which delineates a standard message format for retailers and third parties. In addition, the State agency shall ensure that the EBT system meets performance and technical standards in the areas of system processing speeds, system availability and reliability, system security, system ease-of-use, minimum card and terminal requirements, performance bonding, and a minimum transaction set. With prior written approval from FNS, the State agency may utilize the prevailing industry performance standards in its region in lieu of those identified in this section. The standards shall be included in all requests for proposals and contracts.

- (3) System security. As an addition to or component of the Security Program required of Automated Data Processing systems prescribed under §277.18(m) of this chapter, the State agency shall ensure that the following EBT security requirements are established:
- (i) Storage and control measures to control blank unissued EBT cards and PINs, and unused or spare POS devices;
  - (ii) Measures to ensure communication access control. Communication controls shall include the transmission of transaction data and issuance information from POS terminals to work-stations and terminals at the data processing center. The following specific security measures shall be included, as appropriate, in the system design documentation, operating procedures or the State agency Security Program: (A) Computer hardware controls that ensure acceptance of data from authorized terminals only. These controls shall include the use of mechanisms such as retailer identification codes, terminal identifiers and user identification codes, and/or other mechanisms and procedures recognized by the industry; (B) Software controls, placed at either the terminal or central computer or both, that establish separate control files containing lists of authorized retailers, terminal identifying codes, and user access and identification codes. EBT system software controls shall include separate checks against the control files in order to validate each transaction prior to authorization and limiting the number of unsuccessful PIN attempts that can be made utilizing standard industry practices before the card is deactivated; (C) Communications network security that utilizes the Data Encryption Standard algorithm to encrypt the PIN, at a minimum, from the point of entry. Other security may include authentication codes and check-sum digits, in combination with data encoded on the magnetic stripe such as the PIN and/or PIN offset, to ensure data security during electronic transmission. Any of the network security measures may be utilized together or separately and may be applied at the terminal or central computer as indicated in the approved system design to ensure communications control; (D) Manual procedures that provide for secure access to



**STATE OF WEST VIRGINIA**  
**SCHEDULE OF FINDINGS AND QUESTIONED COSTS**  
**for the Year Ended June 30, 2017**

**2017-001 SPECIAL TESTS AND PROVISIONS – EBT CARD SECURITY**  
**(continued)**

the system with minimal risk to household or retailer accounts. Manual procedures may include the utilization of manager identification codes in obtaining telephonic authorization from the central computer system; requirements for separate entry with audio response unit verification and authorization number; and/or the utilization of 24 hour hotline telephone numbers to authorize transactions. (iii) Message validation shall include but shall not be limited to: (A) Message format checks for completeness of the message, correct order of data, existence of control characters, number and size of data fields and appropriate format standards as specified in the approved system design; (B) Range checks for acceptable date fields, number and valid account numbers, purchase and refund upper limitations in order to prevent and control damage to the system accounts; (C) Reversal of messages that are not fully processed and recorded. (iv) Administrative and operational procedures shall ensure that: (A) Functions affecting an account balance are separated or dually controlled during processing and when requesting Federal reimbursement through a concentrator bank under the provisions of paragraph (i) of this section. These functions may include but are not limited to the setup of accounts, transmittal of funds to and from accounts, access to files to change account records, and transmittal of retailer deposits to the ACH network or other means approved by FNS for crediting retailer bank accounts; (B) Passwords, identity codes or other security procedures must be utilized by State agency or local personnel and at data processing centers; (C) Software programming changes shall be dual controlled to the extent possible; (D) System operations functions shall be segregated from reconciliation duties; (v) A separate EBT security component shall be incorporated into the State agency Security Program for Automated Data Processing (ADP) systems where appropriate as prescribed under §277.18(m) of this chapter. The periodic risk analyses required by the Security Program shall address the following items specific to an EBT system: (A) EBT system vulnerability to theft and unauthorized use; (B) Completeness and timeliness of the reconciliation system; (C) Vulnerability to tampering with or creating household accounts; (D) Erroneous posting of issuances to household accounts; (E) Manipulation of retailers' accounts such as creation of false transactions or intrusion by unauthorized computer users; (F) Capability to monitor systematic abuses at POS terminals such as debits for a complete allotment, excessive manual issuances, and multiple manual transactions at the same time. Such monitoring may be accomplished through the use of exception reporting; (G) Tampering with information on the ACH tape or similar information utilized in a crediting method approved by FNS; and, (H) The availability of a complete audit trail. A complete audit trail shall, at a minimum, be able to provide a complete transaction history of each individual system activity that affects an account balance. The audit trail shall include the tracking of issuances from the Master File and Issuance File, network transactions from POS terminals to EBT central computer database and system file updates. (vi) The State agency shall incorporate the contingency plan approved by FNS into the Security Program. (4) *System ease-of-use.* (i) For all system users, the State agency shall ensure that the system: (A) Minimizes the number of separate steps required to complete a transaction; (B) Minimizes the number of codes or commands needed to make use of the system; (C) Makes available clear and comprehensive account balance information with a

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minimum number of actions necessary; (D) Provides training and instructions for all system users especially those persons with disabilities; (E) Makes available prompts on POS terminals or balance only terminals, where appropriate; (F) Identifies procedures for problem resolution; (G) Provides reasonable accommodation for the needs of households with disabilities in keeping with the Americans with Disabilities Act of 1990. (ii) In addition to the requirements of paragraph (h)(4)(i) of this section, the State agency shall ensure that retailers utilizing the EBT system: (A) Have available manual backup procedures; (B) Can obtain timely information on daily credits to their banks; (C) Have available deposit information in a format readily comparable to information maintained in the store; and (D) Have available instructions on resolving problems with equipment and retailer accounts. (5) Minimum card requirements. (i) The address of the office where a card can be returned if found or no longer in use should be printed on the card. (ii) State agencies that implement the photo EBT card option in accordance with paragraph (f) of this section must print on the EBT cards the text “Any user with valid PIN can use SNAP benefits on card and need not be pictured.” or similar alternative text approved by FNS. (iii) FNS reserves the right to require State agencies to place a Department logo on the EBT card and/or sleeves or jackets. (iv) EBT cards and/or sleeves or jackets shall not contain the name of any State or local official. EBT informational materials shall not indicate association with any political party or other political affiliation. (v) State agencies may require the use of a photograph of one or more household members on the card. If the State agency does require the EBT cards to contain a photo, it must establish procedures to ensure that all appropriate household members or authorized representatives are able to access benefits from the account as necessary. (6) POS terminals. POS terminals shall meet the following requirements: (i) Balance information shall not be displayed on the screen of the POS terminal except for balance-only inquiry terminals; (ii) PINs shall not be displayed at the terminal; and (iii) PIN encryption shall occur from the point of entry in a manner which prevents the unsecured transmission between any point in the system. (7) Transaction receipts. Households shall be provided printed receipts at the time of transaction. At a minimum this information shall: (i) State the date, merchant's name and location, transaction type, transaction amount and remaining balance for the SNAP account; (ii) Comply with the requirements of 12 CFR part 205 (Regulation E) in addition to the requirements of this section; and (iii) Identify the SNAP households member's account number (the PAN) using a truncated number or coded transaction number. The households' name shall not appear on the receipt except when a signature is required when utilizing a manual transaction voucher. (8) Performance bonding. The State agency may require a performance bond in accordance with §277.8 of this chapter or utilize other contractual clauses it deems necessary to enforce the requirements of this section. (9) Minimum transaction set. At a minimum, the State agency shall ensure that the EBT system, including third party processors and retailers driving their own terminals, is capable of providing for

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authorizing or rejecting purchases, refunds or customer credits, voids or cancellations, key entered transactions, balance inquiries and settlement or close-out transactions. The system must be capable of completing this transaction set across State borders nationwide in accordance with standards specified in paragraph (h)(10) of this section. (10) Interoperability. State agencies must adopt uniform standards to facilitate interoperability and portability nationwide. The term “interoperability” means the EBT system must enable benefits issued in the form of an EBT card to be redeemed in any State. The term “portability” means the EBT system must enable benefits issued in the form of an EBT card to be used in any State by a household to purchase food at a retail food store or a wholesale food concern approved under the Food and Nutrition Act of 2008. The standards must include the following: (i) EBT system connectivity. State agencies are responsible for establishing telecommunications links, transaction switching facilities and any other arrangements with other State agencies necessary for the routing of interoperable transactions to such other State EBT authorization systems. State agencies are also responsible for facilitating the settlement of such interoperable transactions and the handling of adjustments. These connections need not be direct connections between State authorization systems but may be facilitated through agreements and linkages with other designated agents or third party processors. All State agencies must agree to the timing and disposition of disputes, error resolution, and adjustments in accordance with Department regulations at §273.13(a) and §273.15(k) of this chapter and paragraph (f) of this section. State agencies or their designated agents must draw funds from State SNAP accounts for SNAP benefits transacted by that State's SNAP recipients, regardless of where benefits were transacted. (ii) Message format. Each authorization system must use the ISO 8583 message format, modified for EBT, in a version mutually agreed to between the authorization agent and the party connected for all transactions. Each authorization system must process each financial transaction as a single message financial transaction, except for pre-authorized transactions and reversals, processed as paired transactions. (iii) Card Primary Account Number (PAN) Requirements. Track 2 on each card shall contain the PAN. Each Government entity must obtain an Issuer Identification Number (IIN) from the American Bankers Association (ABA). The IIN should be included as the first six digits of the PAN. The PAN must comply with ISO 7812, Identification Cards—Numbering System and Registration Procedures for Issuer Identifiers. Each State agency must be responsible for generating, updating, and distributing IIN files of all States to each retailer, processor, or acquirer that is directly connected to the State's authorization system. Each terminal operator that uses a routing table for routing acquired transactions must, within 7 calendar days of receiving an IIN routing table update, modify its routing tables to reflect the updated routing information. (iv) Third Party Processor requirements. Each Third Party Processor or terminal operator must have primary responsibility and liability for operating the telecommunications and processing system (including software and hardware) through which transactions initiated at POS terminals it owns, operates, controls or for which it has signed an agreement to accept EBT transactions, are processed and routed, directly or indirectly, to the appropriate State authorization system. Each terminal operator must maintain the necessary computer hardware and software to interface either directly with a State authorization system or with a third party service provider to obtain access to one or more State authorization systems. Each terminal operator must also

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(continued)**

establish a direct or indirect telecommunications connection for the routing of transactions to the State authorization system or to a processor directly or indirectly connected to the State authorization system. (v) REDE File. The State agency must ensure that their EBT system verifies FNS retailer numbers for all interstate transactions against the National REDE file of all FNS EBT retailers to validate these transactions.” 2 CFR 200.303 requires that the West Virginia Department of Health and Human Services must “(a) establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the comptroller General of the United States and the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

**Condition:** The State’s EBT card security is addressed in the West Virginia EBT System Security Plan, which addresses specific EBT card security objectives including observance of the physical security over EBT cards and/or other negotiable instruments used in the issuance process and verification that EBT cards returned from the Postal Service are returned to inventory or destroyed. However, there is no documentation that the West Virginia EBT System Security Plan’s components are operating effectively as designed; however, there is no documentation that an observation of the physical security over EBT cards or verification that EBT cards returned from the Postal Service were returned to inventory or destroyed.

**Questioned Costs:** N/A

**Context:** Total EBT issuances for the SNAP Cluster were \$490,482,593 for the year ended June 30, 2017. Total federal expenditures for the SNAP Cluster were \$511,715,496 for the year ended June 30, 2017.

**Cause:** While EBT card security is addressed in the West Virginia EBT System Security Plan, the operating effectiveness of these security measures were not validated by the State.

**Effect:** EBT cards may be stolen, embezzled, lost, damaged, destroyed, transferred, negotiated, or used without authorization and not identified in a timely manner.

**Recommendation:** We recommend that West Virginia Department of Health and Human Resources (DHHR) review the applicable requirements for EBT card security to ensure and develop a plan to validate it for operating effectiveness.

**Views of Responsible Officials and Planned Corrective Actions:** Management acknowledges the finding. See corrective action plan.

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**2017–002 DHHR INFORMATION SYSTEM AND RELATED BUSINESS PROCESS CONTROLS  
(Prior Year Findings 2016–017, 2015–025, 2014–016, 2013–034, 2012–51, 2011–46, 2010–43, 2009–43, 2008–55)**

<b>Federal Program Information:</b>	<b>Federal Agency and Program Name</b>	<b>CFDA #</b>
	U.S. Department of Agriculture Supplemental Nutrition Assistance Program (SNAP) Cluster Grant Awards 1WV400401 and 1WV430459	10.551/10.561
	U.S. Department of Health and Human Services Temporary Assistance for Needy Families (TANF) Cluster Grant Awards 2015G996115 and 2016G996115	93.558
	Low-Income Home Energy Assistance Grant Awards G-1501WVLIE4, G-15B1WVLIEA, G-1601WVLIE4, G-16B1WVLIEA, G-17B1WVLIEA, and G-1701WVLIE4	93.568
	Child Care and Development Fund (CCDF) Cluster Grant Awards G1601WVCCDF and G1701WVCCDF	93.575/93.596
	Foster Care—Title IV-E Grant Awards 1601WVFOST and 1701WVFOST	93.658
	Adoption Assistance Grant Awards 1601WVADPT and 1701WVADPT	93.659
	Children’s Health Insurance Program (CHIP) Grant Awards 1505WV5021, 1605WV5021, 1705WV5021, and 1705VW0301	93.767

**Criteria:** 2 CFR 200.303 requires that the West Virginia Department of Health and Human Services must “(a) establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the comptroller General of the United States and the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

OMB Circular A-133 section 300b requires that DHHR is responsible for maintaining “internal control over Federal programs that provides reasonable assurance that management is managing Federal awards in compliance with laws, regulations, and the provisions of contracts or grant agreements that could have a material effect on each of its Federal programs.”

**Condition:** **Family and Children Tracking System (FACTS):** West Virginia Department of Health and Human Resources (DHHR) operates a wide variety of computer applications, many of which affect federal and State programs’ data. Our review of the information system controls noted that adequate segregation of duties does not exist for the FACTS information system. Certain users have the ability to both create and approve cases. We noted that management implemented a mitigating detect control for the Foster Care program during fiscal year 2012 in response to this repeat finding; however, it was not designed to encompass the Adoption Assistance program or automatic payments in the Foster Care program. Additionally, no supervisory review is required for provider payment information input into the system.

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**2017–002 DHHR INFORMATION SYSTEM AND RELATED BUSINESS PROCESS CONTROLS  
(Prior Year Findings 2016–017, 2015–025, 2014–016, 2013–034, 2012–51, 2011–46, 2010–43, 2009–43, 2008–55) (continued)**

**Recipient Automated Payment Information Data System (RAPIDS) Application Suite:** Our testing of the controls surrounding eligibility determination noted that adequate segregation of duties does not exist for the RAPIDS system. No supervisory review is required for case information input into the system. Further, it was noted that approval of disbursements only occurs at the batch level, which does not allow the approval worker to review each transaction individually.

**Questioned Costs:** N/A

**Context:** Total federal expenditures for these programs can be located in the Schedule of Expenditures of Federal Awards.

The table below identifies the programs and federal compliance requirements impacted.

Federal Program	System	Compliance Requirements Impacted
Children's Health Insurance Program (CHIP)	RAPIDS	Eligibility
Supplemental Nutrition Assistance Program (SNAP) Cluster	RAPIDS	Special Tests and Provisions – ADP System for SNAP
Temporary Assistance for Needy Families (TANF) Cluster	RAPIDS	Activities Allowed or Unallowed, Allowable Costs/Cost Principles
Low-Income Home Energy Assistance	RAPIDS	Activities Allowed or Unallowed, Allowable Costs/Cost Principles, Eligibility, Period of Availability of Federal Funds/Period of Performance
Adoption Assistance	FACTS	Activities Allowed or Unallowed, Allowable Costs/Cost Principles, Eligibility
Foster Care – Title IV-E	FACTS	Activities Allowed or Unallowed, Allowable Costs/Cost Principles, Eligibility
Child Care and Development Fund (CCDF) Cluster	FACTS	Activities Allowed or Unallowed, Allowable Costs/Cost Principles, Eligibility

**Cause:** Policies and procedures have not been adequately updated for changes in the processing of eligibility. Furthermore, management indicated that a lack of personnel resources contributes to the proper segregation of duties issue.

**Effect:** Without proper segregation of duties or adequate detect controls, the ability exists for certain information system users to create and approve cases and demand payments within the FACTS application. Information can be input into the FACTS application or modified within the application without supervisory review, which could lead to payments being made to ineligible applicants, for the improper amount, or for an improper length of time.

Without proper segregation of duties or adequate detect controls, the ability exists for case workers to input unsupported information into an applicant's eligibility calculation within RAPIDS. Further, without supervisory review at the transactional level, disbursements for unallowable costs or activities could occur.

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(Prior Year Findings 2016-017, 2015-025, 2014-016, 2013-034, 2012-51, 2011-46, 2010-43, 2009-43, 2008-55) (continued)**

**Recommendation:** This is a repeat finding, and management should develop an effective corrective action plan to address this matter in a timely manner. We recommend that access to various FACTS system applications be restricted to a limited number of users. Controls should be established to ensure that an individual is limited to either creating or approving cases or payments. A detect control should be implemented that would require a review of all individual cases and payments with the same request and approval worker to ensure that cases and payments created and approved were appropriate.

Further, we recommend that a formal review process be implemented to ensure that information input into FACTS and RAPIDS is properly reviewed by authorized individuals prior to payment.

**Views of  
Responsible  
Officials and  
Planned Corrective  
Actions:**

Management acknowledges the finding. See corrective action plan.



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**2017–003 PROCUREMENT PROCEDURES**

<b>Federal Program Information:</b>	<b>Federal Agency and Program Name</b>	<b>CFDA #</b>
	U.S. Department of Agriculture Supplemental Nutrition Assistance Program (SNAP) Cluster Grant Awards 1WV400401 and 1WV430459	10.551/10.561
	U.S. Department of Health and Human Services Temporary Assistance for Needy Families (TANF) Cluster Grant Awards 2015G996115 and 2016G996115	93.558
	Low-Income Home Energy Assistance Grant Awards G-1501WVLIE4, G-15B1WVLIEA, G-1601WVLIE4, G- 16B1WVLIEA, G-17B1WVLIEA, G- 1701WVLIE4	93.568
	Child Care and Development Fund (CCDF) Cluster Grant Awards G1601WVCCDF and G1701WVCCDF	93.575/93.596
	Foster Care—Title IV-E Grant Awards 1601WVFOST and 1701WVFOST	93.658
	Adoption Assistance Grant Awards 1601WVADPT and 1701WVADPT	93.659
	Children’s Health Insurance Program (CHIP) Grant Awards 1505WV5021, 1605WV5021, 1705WV5021, and 1705VW0301	93.767
	Medicaid Cluster  Grant Awards 1605WV5MAP, 1605WV5ADM, 1605WVINCT, 1605WVIMPL, 1705WV5MAP, 1705WV5ADM, 1705WVINCT, and 1705WVIMPL	93.775/93.777/ 93.778

**Criteria:** 2 CFR 200.212 requires “Non-federal entities and contractors are subject to the non-procurement debarment and suspension regulations implementing Executive Orders 12549 and 12689, 2 CFR part 180. These regulations restrict awards, subawards, and contracts with certain parties that are debarred, suspended, or otherwise excluded from or ineligible for participation in Federal assistance programs or activities.”

2 CFR 200.212(h) requires “The non-Federal entity must award contracts only to responsible contractors possessing the ability to perform successfully under the terms and conditions of a proposed procurement. Consideration will be given to such matters as contractor integrity, compliance with public policy, record of past performance, 48 CFR 180.300 states “What must I do before I enter into a covered transaction with another person at the next lower tier? When you enter into a covered transaction with another person at the next lower tier, you must verify that the person with whom you intend to do business is not excluded or disqualified. You do this by: (a) Checking the EPLS; or (b) Collecting a certification from that person; or (c) Adding a clause or condition to the covered transaction with that person.

Per Section 6.7.1 of the State of West Virginia Purchasing Division Procedures Handbook, administrative changes to contracts should be made after the fact with subsequent approval by the Purchasing Division and the Attorney General’s Office (as to form) prior to the implementation of the change.

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**2017-003 PROCUREMENT PROCEDURES  
(continued)**

2 CFR 200.303 requires that the West Virginia Department of Health and Human Services must “(a) establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the comptroller General of the United States and the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

OMB Circular A-133 section 300b requires that DHHR is responsible for maintaining “internal control over Federal programs that provides reasonable assurance that management is managing Federal awards in compliance with laws, regulations, and the provisions of contracts or grant agreements that could have a material effect on each of its Federal programs.”

**Condition:** Three of 40 procurement transactions tested were not properly approved before the contract period started or before the contract period was renewed. The two transactions represent \$3,204 out of a total population tested of \$1,201,164. Total procurement contracts entered into by DHHR for the year ended June 30, 2017 was approximately \$9.8 million.

**Questioned Costs:** \$3,204 - \$350 related to CFDA #93.074 – Grant Award U90TP000560-03; \$263 related to CFDA # 93.074 – Grant Award U90TP000560-04 and \$2,591 related to CFDA # 93.758 – Grant Award NB01TOT009088-01.

**Context:** Total federal expenditures for these programs can be located in the Schedule of Expenditures of Federal Awards.

**Cause:** West Virginia Department of Health and Human Resources (DHHR) appears to have policies and procedures which include internal controls such as the approval of procurement transactions by a knowledgeable person; however, the agency has failed to actively enforce those internal controls.

**Effect:** Federal expenditures could be made for unallowable procurement transactions.

**Recommendation:** We recommend that the DHHR strengthen the existing policies and procedures surrounding the approval of procurement transactions.

**Views of Responsible Officials and Planned Corrective Actions:** Management acknowledges the finding. See corrective action plan.

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**2017-004 SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS**

<b>Federal Program Information:</b>	<b>Federal Agency and Program Name</b>	<b>CFDA #</b>
	U.S. Department of Education Office of Student Financial Assistance Office of Post-Secondary Education	
	U.S. Department of Health and Human Services Health Resources and Services Administration Student Financial Assistance (SFA) Cluster	84.007/84.033/ 84.038/84.063/ 84.268/84.379/ 93.264/93.342/ 93.364/93.925

**Criteria:** 2 CFR 200.303 requires that Institutions must “(a) establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the Comptroller General of the United States and the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

**Condition:** Fairmont State University’s (FSU) and West Liberty University’s (WL) internal controls are not adequate to ensure the Schedule of Expenditures of Federal Awards (SEFA) accurately reports all federal assistance. Our review of FSU’s SEFA for fiscal year 2017 identified that total Perkins Loan disbursements were overstated by \$487,615 and total Perkins Loan receipts were overstated by \$487,615. Additionally, our review of WL’s SEFA for fiscal year 2017 identified Pell disbursements were understated by \$3,636,392.

**Questioned Costs:** N/A

**Context:** Total student financial assistance expenditures for the State of West Virginia were \$640,453,242 for the year ended June 30, 2017.

**Cause:** FSU and WL have not implemented adequate internal controls to ensure the SEFA is accurate.

**Effect:** FSU and WL are not properly reporting their federal expenditures and major programs may not be appropriately identified on a timely basis.

**Recommendation:** We recommend that FSU and WL ensure staff responsible for the preparation of the SEFA have the resources needed to accurately prepare the SEFA.

**Views of Responsible Officials and Planned Corrective Actions:** Management acknowledges the finding. See corrective action plan.

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**2017–005 SPECIAL TESTS AND PROVISIONS – RETURN OF TITLE IV FUNDS  
(Prior Year Finding 2016–010)**

<b>Federal Program Information:</b>	<b>Federal Agency and Program Name</b>	<b>CFDA #</b>
	U.S. Department of Education Office of Student Financial Assistance Office of Post-Secondary Education	
	U.S. Department of Health and Human Services Health Resources and Services Administration Student Financial Assistance (SFA) Cluster	
		84.007/84.033/ 84.038/84.063/ 84.268/84.379/ 93.264/93.342/ 93.364/93.925

**Criteria:** 34 CFR 668.22(a) requires Institution “when a recipient of Title IV grant or loan assistance withdraws from an institution during a payment period or period of enrollment in which the recipient began attendance, the institution must determine the amount of Title IV grant or loan assistance that the student earned as of the student’s withdrawal date in accordance with paragraph (e) of this section.”

34 CFR 668.22(e)(1) requires “the amount of Title IV grant or loan assistance that is earned by the student is calculated by (i) Determining the percentage of Title IV grant or loan assistance that has been earned by the student, as described in paragraph (e)(2) of this section; and (ii) Applying this percentage to the total amount of Title IV grant or loan assistance that was disbursed (and that could have been disbursed, as defined in paragraph (l)(1) of this section) to the student, or on the student's behalf, for the payment period or period of enrollment as of the student's withdrawal date.”

34 CFR 668.22(e)(2) requires “the percentage of Title IV grant or loan assistance that has been earned by the student is— (i) Equal to the percentage of the payment period or period of enrollment that the student completed (as determined in accordance with paragraph (f) of this section) as of the student's withdrawal date, if this date occurs on or before— (A) Completion of 60 percent of the payment period or period of enrollment for a program that is measured in credit hours; or (B) Sixty percent of the clock hours scheduled to be completed for the payment period or period of enrollment for a program that is measured in clock hours; or (ii) 100 percent, if the student's withdrawal date occurs after— (A) Completion of 60 percent of the payment period or period of enrollment for a program that is measured in credit hours; or (B) Sixty percent of the clock hours scheduled to be completed for the payment period or period of enrollment for a program measured in clock hours. (3) Percentage unearned. The percentage of Title IV grant or loan assistance that has not been earned by the student is calculated by determining the complement of the percentage of Title IV grant or loan assistance earned by the student as described in paragraph (e)(2) of this section.”

34 CFR 668.22(f)(1) requires “the percentage of Title IV grant or loan assistance that has been earned by the student is— (i) Equal to the percentage of the payment period or period of enrollment that the student completed (as determined in accordance with paragraph (f) of this section) as of the student's withdrawal date, if this date occurs on or before— (A) Completion of 60 percent of the payment period or period of enrollment for a program that is measured in credit hours; or (B) Sixty percent of the clock hours scheduled to be completed for the payment period or period of enrollment for a program that is measured in clock hours; or (ii) 100 percent, if the student's withdrawal date occurs after— (A) Completion of 60

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**2017–005 SPECIAL TESTS AND PROVISIONS – RETURN OF TITLE IV FUNDS**  
**(Prior Year Finding 2016–010) (continued)**

percent of the payment period or period of enrollment for a program that is measured in credit hours; or (B) Sixty percent of the clock hours scheduled to be completed for the payment period or period of enrollment for a program measured in clock hours. (3) Percentage unearned. The percentage of Title IV grant or loan assistance that has not been earned by the student is calculated by determining the complement of the percentage of Title IV grant or loan assistance earned by the student as described in paragraph (e)(2) of this section.”

34 CFR 668.22(g)(1) requires “the institution must return, in the order specified in paragraph (i) of this section, the lesser of— (i) The total amount of unearned Title IV assistance to be returned as calculated under paragraph (e)(4) of this section; or (ii) An amount equal to the total institutional charges incurred by the student for the payment period or period of enrollment multiplied by the percentage of Title IV grant or loan assistance that has not been earned by the student, as described in paragraph (e)(3) of this section.”

34 CFR 668.22(j)(1) requires “an institution must return the amount of Title IV funds for which it is responsible under paragraph (g) of this section as soon as possible but no later than 45 days after the date of the institution's determination that the student withdrew as defined in paragraph (l)(3) of this section. The timeframe for returning funds is further described in §668.173(b).”

34 CFR 668.173(b)(1) requires “in accordance with procedures established by the Secretary or FFEL Program lender, an institution returns unearned Title IV, HEA program funds timely if— (1) The institution deposits or transfers the funds into the bank account it maintains under §668.163 no later than 45 days after the date it determines that the student withdrew;”

2 CFR 200.303 requires that Institutions must “(a) establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the Comptroller General of the United States and the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

**Condition:** The institutions are required to have internal controls in place surrounding the calculation of the return of Title IV funds. During our testing of West Virginia State University, it was determined that this institution did not have a formalized internal control process, such as a formalized review and approval control, surrounding the calculation of Title IV funds. Furthermore, for one of the 21 sampled the return of the Title IV calculation was either not calculated or improperly calculated. We then sampled an additional 15 Title IV Refunds for testing and found four additional errors. Further, according to the Federal Program Review Determination issued by the U.S. Department of Education, Mountwest made errors when performing the return of Title IV calculation for seven students selected, as well as returned unearned Title IV funds late to the Department for nine students selected.

**Questioned Costs:** \$5,953 – \$4,423 related to CFDA # – 84.268 Grant Award P268K170428; \$1,510 related to CFDA #84.063 – Grant Award P063)160428; \$20 related to CFDA #84.063 – Grant Award P063P155798

**Context:** Total expenditures for the SFA cluster in total were \$640,453,242 for the year ended June 30, 2017.

**STATE OF WEST VIRGINIA  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
for the Year Ended June 30, 2017**

**2017-005 SPECIAL TESTS AND PROVISIONS – RETURN OF TITLE IV FUNDS  
(Prior Year Finding 2016-010) (continued)**

**Cause:** Formal review and approval process is not in place related to the calculation of the return of Title IV funds nor is evidence of the review maintained.

**Effect:** The absence of a review process for the return of Title IV funds could result in the institution's financial records for federal expenditures to be improperly stated or funds not returned on time.

**Recommendation:** The institutions should ensure that that the return of Title IV funds calculation is performed and saved as documented in the institution's written procedure, including retaining documentation of timely supervisor review and approval and return funds within the required time frame.

**Views of Responsible Officials and Planned Corrective Actions:** Management acknowledges the finding. See corrective action plan.

**STATE OF WEST VIRGINIA  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
for the Year Ended June 30, 2017**

**2017–006 SPECIAL TESTS AND PROVISIONS – ENROLLMENT REPORTING  
(Prior Year Findings 2016–008, 2015–015, 2014–011, 2013–028, 2012–43, 2012–47, 2012–49,  
2011-22)**

<b>Federal Program Information:</b>	<b>Federal Agency and Program Name</b>	<b>CFDA #</b>
	U.S. Department of Education	
	Office of Student Financial Assistance	
	Office of Post-Secondary Education	
	U.S. Department of Health and Human Services	
	Health Resources and Services Administration	
	Student Financial Assistance (SFA) Cluster	84.007/84.033/ 84.038/84.063/ 84.268/84.379/ 93.264/93.342/ 93.364/93.925

**Criteria:** 2 CFR 200.303 requires that Institutions must “(a) establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the Comptroller General of the United States and the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

**Condition:** The following institutions did not have internal controls in place surrounding the enrollment reporting process for the selections made: Shepherd University, West Virginia University – Parkersburg, West Liberty University, and West Virginia Northern Community and Technical College.

**Questioned Costs:** N/A

**Context:** Total Direct Loan expenditures for the SFA cluster in total were \$464,565,207 for the year ended June 30, 2017. Total direct loan expenditures for Shepherd University, West Virginia University – Parkersburg, West Liberty University, and West Virginia Northern Community and Technical College was \$40,781,495 for the year ended June 30, 2017.

**Cause:** Due to ineffective internal controls, there could be timing and status discrepancies between the information reported by the institution to the Clearinghouse and their subsequent reporting of enrollment detail to National Student Loan Data System (NSLDS).

**Effect:** The institutions are not promptly reviewing information prior to reporting to the NSLDS; thus, inaccurate information could be reported to the NSLDS.

**Recommendation:** We recommend that the institutions implement a review process to ensure they are promptly reviewing the information being reported to the NSLDS.

**Views of Responsible Officials and Planned Corrective Actions:** Management acknowledges the finding. See corrective action plan.

**STATE OF WEST VIRGINIA  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
for the Year Ended June 30, 2017**

**2017–007 SPECIAL TESTS AND PROVISIONS – BORROWER DATA TRANSMISSION AND RECONCILIATION  
(Prior Year Finding 2016–006)**

<b>Federal Program Information:</b>	<b>Federal Agency and Program Name</b>	<b>CFDA #</b>
	U.S. Department of Education	
	Office of Student Financial Assistance	
	Office of Post-Secondary Education	
	U.S. Department of Health and Human Services	
	Health Resources and Services Administration	
	Student Financial Assistance (SFA) Cluster	84.007/84.033/ 84.038/84.063/ 84.268/84.379/ 93.264/93.342/ 93.364/93.925

**Criteria:** 34 CFR 685.300(a)(5) requires “On a monthly basis, reconcile institutional records with Direct Loan funds received from the Secretary and Direct Loan disbursement records submitted to and accepted by the Secretary.”

2 CFR 200.303 requires that Institutions must “(a) establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the Comptroller General of the United States and the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

**Condition:** For the two months selected for testing of Direct Loan School Account Statement (SAS) reconciliation requirements at Concord University, proper reconciliations were completed by the institution; however, they were not completed timely nor reviewed.

**Questioned Costs:** N/A

**Context:** Total Direct Loan expenditures for the SFA cluster in total were \$464,565,207 for the year ended June 30, 2017.

**Cause:** Written procedures detailing the process to reconcile loans from Common Origination and Disbursement (COD) records to Banner exist, as provided in narrative form during the audit. However, management represented that a formal reconciliation review process has not been successfully implemented.

**Effect:** The absence of proper reconciliations could result in the institution’s financial records for Direct Loan expenditures to be improperly stated.

**Recommendation:** We recommend that management implement the reconciliation process that monthly reconciliations are performed and saved as documented in the institution’s written procedure, including documentation of supervisor review and approval. In addition, management needs to ensure that all data received from COD is maintained within their records to facilitate audit procedures.



**STATE OF WEST VIRGINIA  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
for the Year Ended June 30, 2017**

**2017-007 SPECIAL TESTS AND PROVISIONS – BORROWER DATA TRANSMISSION AND RECONCILIATION**

**(Prior Year Finding 2016-006) (continued)**

<b>Views of Responsible Officials and Planned Corrective Actions:</b>	Management acknowledges the finding. See corrective action plan.
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**STATE OF WEST VIRGINIA  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
for the Year Ended June 30, 2017**

**2017-008 ELIGIBILITY**

**(Prior Year Findings 2016-012, 2015-018)**

<b>Federal Program Information:</b>	<b>Federal Agency and Program Name</b>	<b>CFDA #</b>
	U.S. Department of Education	
	Rehabilitation Services Vocational Rehabilitation Grants	
	to States	84.126
	Grant Award H126A160073	

**Criteria:** 29 USC §722(a)(6), requires that “the designated State unit shall determine whether an individual is eligible for Vocational Rehabilitation (VR) services under this subchapter within a reasonable period of time, not to exceed 60 days, after the individual has submitted an application for the services unless (a) exceptional and unforeseen circumstances beyond the control of the designated State unit preclude making an eligibility determination within 60 days and the designated State unit and the individual agree to a specific extension of time; or (b) the designated State unit is exploring an individual’s abilities, capabilities, and capacity to perform in work situations under paragraph (2)(b).”

2 CFR 200.303 requires that the West Virginia Division of Rehabilitation Services must “(a) establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the comptroller General of the United States and the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

**Condition:** Three of the 25 eligibility determinations reviewed were not completed within 60 days or within the period of extension.

**Questioned Costs:** N/A

**Context:** Total federal expenditures for the Vocational Rehabilitation Grant were \$40,424,101 for the year ended June 30, 2017.

**Cause:** WVDRS appears to have policies and procedures, which include internal controls, in place to address eligibility; however, it has failed to actively enforce those internal controls.

**Effect:** Federal expenditures could be made for individuals who were potentially ineligible.

**Recommendation:** We recommend that WVDRS strengthen the existing policies and procedures surrounding the approval of eligible participants and ensure the appropriate completion of all eligibility determinations on a timely basis.

**Views of Responsible Officials and Planned Corrective Actions:** Management acknowledges the finding. See corrective action plan.

**STATE OF WEST VIRGINIA  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
for the Year Ended June 30, 2017**

**2017-009 SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS**

<b>Federal Program Information:</b>	<b>Federal Agency and Program Name</b> U.S. Department of Education Rehabilitation Services Vocational Rehabilitation Grants to States Grant Award H126A160073	<b>CFDA #</b>     84.126
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**Criteria:** 2 CFR 200.303 requires that Institutions must “(a) establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the Comptroller General of the United States and the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

**Condition:** The SEFA for West Virginia Division of Rehabilitation Services (WVDRS) did not agree to the underlying support of federal expenditures.

**Questioned Costs:** N/A

**Context:** Total federal expenditures for the Vocational Rehabilitation Grant were \$40,424,101 for the year ended June 30, 2017. Total misstatements on the SEFA were \$79,380, which were corrected in the SEFA.

**Cause:** WVDRS appears to have policies and procedures, including internal controls, in place to prepare and review the SEFA; however, it has failed to actively enforce those internal controls.

**Effect:** Federal expenditures may not be properly reported.

**Recommendation:** We recommend that WVDRS strengthen the existing policies and procedures surrounding the preparation and review of the SEFA.

**Views of Responsible Officials and Planned Corrective Actions:** Management acknowledges the finding. See corrective action plan.

**STATE OF WEST VIRGINIA  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
for the Year Ended June 30, 2017**

**2017–010 SPECIAL TESTS AND PROVISIONS –CHILD SUPPORT NON-COOPERATION, PENALTY FOR REFUSAL TO WORK, AND ADULT CUSTODIAL PARENT OF CHILD UNDER SIX WHEN CHILD CARE NOT AVAILABLE  
(Prior Year Findings 2016–016, 2015–024, 2014–018, 2013–036, 2012–56, 2011–44, 2010–41)**

<b>Federal Program Information:</b>	<b>Federal Agency and Program Name</b>	<b>CFDA #</b>
	U.S. Department of Health and Human Services	
	Temporary Assistance for Needy Families (TANF) Cluster	93.558
	Grant Award 2017 – 2016G996115	
	Grant Award 2016 – 2015G996115	

**Criteria:** 2 CFR 200.303 requires that the West Virginia Department of Health and Human Services must “(a) establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the comptroller General of the United States and the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

**Condition:** DHHR has policies and procedures in place surrounding the issuance or removal of sanctions. However, the control documentation provided by DHHR is not adequate to ensure that sanctions could not be issued or removed against TANF recipients in error or without appropriate cause by a caseworker.

**Questioned Costs:** N/A

**Context:** Total federal expenditures for TANF for the fiscal year ended June 30, 2017 were \$77,791,462.

**Cause:** There is lack of sufficient documentary evidence to rely on controls surrounding the issuance or removal of sanctions against TANF recipients.

**Effect:** Recipient benefits may potentially be reduced or increased in error or without appropriate cause.

**Recommendation:** We recommend that DHHR management maintain sufficient documentation to evidence its review prior to the issuance or removal of sanctions. Evidence may include documentation that each recipient was afforded an opportunity to establish good cause prior to the imposition of a sanction in the form of a notification of good cause appointment. Additionally, documentation may include evidence that all caseworkers with access to issue or remove sanctions have read and understand the policies and procedures surrounding the issuance and removal of sanctions, as well as, evidence that caseworkers are made aware of any changes to procedures for the issuance and removal of sanctions that occur subsequent to their initial training. Evidence should also be maintained to document supervisor review of sanctions that are lifted on recipient cases when the benefit amount is increased. We recommend that a log of instances in which a supervisor approves his/her own sanction be maintained and periodically reviewed to ensure the sanctions are reasonable. The supervisor approval and log should be clearly documented, whether electronically in the information technology system or by other means.

**STATE OF WEST VIRGINIA  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
for the Year Ended June 30, 2017**

**2017-010 SPECIAL TESTS AND PROVISIONS –CHILD SUPPORT NON-COOPERATION, PENALTY  
FOR REFUSAL TO WORK, AND ADULT CUSTODIAL PARENT OF CHILD UNDER SIX  
WHEN CHILD CARE NOT AVAILABLE**

**(Prior Year Findings 2016-016, 2015-024, 2014-018, 2013-036, 2012-56, 2011-44, 2010-41)  
(continued)**

**Views of** Management acknowledges the finding. See corrective action plan.  
**Responsible**  
**Officials and**  
**Planned Corrective**  
**Actions:**

**STATE OF WEST VIRGINIA  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
for the Year Ended June 30, 2017**

**2017–011 ALLOWABILITY AND ELIGIBILITY**

**(Prior Year Findings 2016–018, 2015-026, 2014-021, 2013-037, 2012-57, 2011-50, 2010-46, 2009-48, 2008-59, 2007-59, 2006-43, 2005-50)**

<b>Federal Program Information:</b>	<b>Federal Agency and Program Name</b> U.S. Department of Health and Human Services Low-Income Home Energy Assistance Grant Award G–15B1WVLIEA Grant Award G–1501WVLIE4 Grant Award G–16B1WVLIEA Grant Award G–1601WVLIE4 Grant Award G–17B1WVLIEA Grant Award G–1701WVLIE4	<b>CFDA #</b>  93.568
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**Criteria:** The eligibility compliance requirements of LIHEAP require the West Virginia Department of Health and Human Resources (DHHR) to determine whether federal monies are spent in accordance with the eligibility guidelines promulgated by 42 USC 8624(b)(2).

2 CFR 200.303 requires that the West Virginia Department of Health and Human Services must “(a) establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the comptroller General of the United States and the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

OMB Circular A-133 section 300b requires that DHHR is responsible for maintaining “internal control over Federal programs that provides reasonable assurance that management is managing Federal awards in compliance with laws, regulations, and the provisions of contracts or grant agreements that could have a material effect on each of its Federal programs.”

**Condition:** During our testing of 60 benefit payments for eligibility and allowability, we noted for 3 of the 60 benefit payments, DFA-LIEAP-1b form was not signed by caseworker prior to payment. The DFA-LIEAP-1b form is a supplemental form used to document how an application is received (through mail, office visit, or another agency).

**Questioned Costs:** \$665 – CFDA #93.568 – Grant Award G-17B1WVLIEA

**Context:** The three instances (3 of 60 case files) represent \$665 of benefit payments out of a total population of benefit payments tested of \$15,021. Total payments for benefit assistance for the LIHEAP program for the fiscal year ended June 30, 2017 were \$19,648,904. The federal expenditures for the LIHEAP program for the fiscal year ended June 30, 2017, were \$28,403,675.

**Cause:** Management indicated that the errors were due to caseworker oversight.

**Effect:** A payment may have been made for ineligible recipients and some payments were not properly approved and/or supported with appropriate documentation.

**Recommendation:** We recommend that DHHR evaluate the effectiveness of the current training programs for the LIHEAP program to ensure adequate technical training is provided. Furthermore, DHHR should follow established policies and procedures to ensure that necessary approvals are obtained and the necessary documentation is maintained in the recipient case files.

**STATE OF WEST VIRGINIA  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
for the Year Ended June 30, 2017**

**2017-011 ALLOWABILITY AND ELIGIBILITY**

**(Prior Year Findings 2016-018, 2015-026, 2014-021, 2013-037, 2012-57, 2011-50, 2010-46, 2009-48, 2008-59, 2007-59, 2006-43, 2005-50) (continued)**

**Views of  
Responsible  
Officials and  
Planned Corrective  
Actions:**

Management acknowledges the finding. See corrective action plan.

**STATE OF WEST VIRGINIA  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
for the Year Ended June 30, 2017**

**2017–012 REPORTING DOCUMENTATION  
(Prior Year Finding 2016–019)**

<b>Federal Program Information:</b>	<b>Federal Agency and Program Name</b>	<b>CFDA #</b>
	U.S. Department of Health and Human Services	
	Low-Income Home Energy Assistance	93.568
	Grant Award G–15B1WVLIEA	
	Grant Award G–1501WVLIE4	
	Grant Award G–16B1WVLIEA	
	Grant Award G–1601WVLIE4	
	Grant Award G–17B1WVLIEA	
	Grant Award G–1701WVLIE4	

**Criteria:** 45 CFR 96.82 requires (a) Each grantee which is a State or an insular area which receives an annual allotment of at least \$200,000 shall submit to the Department, as part of its LIHEAP grant application, the data required by section 2605(c)(1)(G) of Public Law 97-35 (42 U.S.C. 8624(c)(1)(G)) for the 12-month period corresponding to the Federal fiscal year (October 1-September 30) preceding the fiscal year for which funds are requested. The data shall be reported separately for LIHEAP heating, cooling, crisis, and weatherization assistance.

2 CFR 200.303 requires that the West Virginia Department of Health and Human Services must “(a) establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the comptroller General of the United States and the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

OMB Circular A-133 section 300b requires that DHHR is responsible for maintaining “internal control over Federal programs that provides reasonable assurance that management is managing Federal awards in compliance with laws, regulations, and the provisions of contracts or grant agreements that could have a material effect on each of its Federal programs.”

**Condition:** The Annual Report on Households Assisted by LIHEAP was provided. However, documentation to support the number of assisted households and number of applicant households reported did not agree to the report filed.

**Questioned Costs:** N/A

**Context:** The federal expenditures for the LIHEAP program for the fiscal year ended June 30, 2017, were \$28,403,675. The number of assisted households and number of applicant households reported were 63,610 and 68,823, respectively. The number of assisted households and number of applicant households reported in the support was 112,016 and 134,113, respectively.



**STATE OF WEST VIRGINIA  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
for the Year Ended June 30, 2017**

**2017–012 REPORTING DOCUMENTATION  
(Prior Year Finding 2016–019) (continued)**

**Cause:** Management of the LIHEAP program provided supporting documentation to the auditors that did not agree to the reports filed.

**Effect:** The number of assisted households and number of applicant households reported on the Annual Report on Households Assisted by LIHEAP was incorrectly reported to the federal government.

**Recommendation:** We recommend that the DHHR verify the numbers reported on the Annual Report on Households Assisted by LIHEAP by obtaining the appropriate support. Furthermore, Management of the LIHEAP program should ensure that all documentation supporting the data in the report should be maintained and readily available if requested.

**Views of Responsible Officials and Planned Corrective Actions:** Management acknowledges the finding. See corrective action plan.

**STATE OF WEST VIRGINIA  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
for the Year Ended June 30, 2017**

**2017–013 DISASTER RECOVERY PLAN**

**(Prior Year Findings 2016–020, 2015–027, 2014–022, 2013–038, 2012–58, 2011–51, 2010–47, 2009–50, 2008–61, 2007–62, 2006–45)**

<b>Federal Program Information:</b>	<b>Federal Agency and Program Name</b> U.S. Department of Health and Human Services Child Care and Development Fund (CCDF) Cluster Grant Award 1601WVADPT Grant Award 1701WVADPT	<b>CFDA #</b>  93.575/93.596
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**Criteria:** 2 CFR 200.303 requires that the West Virginia Department of Health and Human Services must “(a) establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the Comptroller General of the United States and the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

OMB Circular A-133 requires 300b requires that the West Virginia Department of Health and Human Resources (DHHR) is responsible for maintaining “internal control over Federal programs that provides reasonable assurance that management is managing Federal awards in compliance with laws, regulations, and the provisions of contracts or grant agreements that could have a material effect on each of its Federal programs.”

**Condition:** DHHR utilizes various service providers for performing certain routine and critical data gathering activities necessary for the operation of its federal and state programs; however, as of June 30, 2017, DHHR had not fully developed formal policies and procedures to ensure that these service providers have adequate disaster recovery procedures in place.

**Questioned Costs:** N/A

**Context:** Total federal expenditures for the CCDF Cluster for fiscal year ended June 30, 2017, were \$35,986,296.

**Cause:** Service providers who maintain certain critical records for the processing of allowability and eligibility of CCDF Cluster payments may not have adequate disaster recovery plans in place.

**Effect:** Critical data supporting allowability and eligibility may not be adequately safeguarded from loss which could result in disallowed costs.

**Recommendation:** We recommend that DHHR continue its current efforts to ensure that all regional child care agencies have sufficient disaster recovery and backup procedures in place to safeguard the eligibility and allowability documentation supporting transactions. Furthermore, DHHR should ensure that the procedures are periodically updated and tested for effectiveness and completeness.

**Views of Responsible Officials and Planned Corrective Actions:** Management acknowledges the finding. See corrective action plan.

**STATE OF WEST VIRGINIA  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
for the Year Ended June 30, 2017**

**2017–014 SPECIAL TESTS AND PROVISIONS – FRAUD DETECTION AND REPAYMENT  
(Prior Year Finding 2016–021)**

<b>Federal Program Information:</b>	<b>Federal Agency and Program Name</b>	<b>CFDA #</b>
	U.S. Department of Health and Human Services	
	Child Care and Development Fund (CCDF) Cluster	93.575/93.596
	Grant Award G1601WVCCDF	
	Grant Award G1701WVCCDF	

**Criteria:** 45 CFR 98.60(i) requires “Lead Agencies shall recover child care payments that are the result of fraud. These payments shall be recovered from the party responsible for committing the fraud.”

2 CFR 200.303 requires that the West Virginia Department of Health and Human Services must “(a) establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations, and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the Comptroller General of the United States and the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

OMB Circular A-133 section 300b requires that the West Virginia Department of Health and Human Resources (DHHR) is responsible for maintaining “internal control over Federal programs that provides reasonable assurance that management is managing Federal awards in compliance with laws, regulations, and the provisions of contracts or grant agreements that could have a material effect on each of its Federal programs.”

**Condition:** Child Care payments resulting from fraud are identified and documented within quarterly reconciliation spreadsheets. The current year quarterly reconciliation spreadsheets identified fraudulent claims established in the previous fiscal year that had not been identified in the previous fiscal year quarterly reconciliation spreadsheets, therefore a complete and accurate population was not available for testing, and we did not perform testing on this compliance requirement.

**Questioned Costs:** N/A

**Context:** Total federal expenditures for the CCDF Cluster for fiscal year ended June 30, 2017, were \$35,986,296.

**Cause:** DHHR experienced a lot of staff turnover during the fiscal year which caused inconsistencies in the way fraudulent claims were identified and reported.

**Effect:** Payments resulting from fraud may not be identified and recovered in a reasonable amount of time.

**Recommendation:** DHHR should adequately train new staff on the processes and controls surrounding the fraud detection and recovery reconciliation process to ensure that all fraudulent claims are identified in the appropriate fiscal year.

**Views of Responsible Officials and Planned Corrective Actions:** Management acknowledges the finding. See corrective action plan.

**STATE OF WEST VIRGINIA  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
for the Year Ended June 30, 2017**

**2017–015 ELIGIBILITY DOCUMENTATION**

(Prior Year Findings 2016–022, 2015–029, 2014–024, 2013–040, 2012–59)

<b>Federal Program Information:</b>	<b>Federal Agency and Program Name</b>	<b>CFDA #</b>
	U.S. Department of Health and Human Services	
	Adoption Assistance	93.659
	Grant Award 1601WVADPT	
	Grant Award 1701WVADPT	

**Criteria:** Section 473 of the Social Security Act requires that the Adoption Assistance Agreement must be in effect prior to the adoptive parents’ receipt of the Adoption Subsidy. Also, 45 CFR 1356.40 requires the Adoption Assistance Agreement must be signed and in effect at the time of or prior to the final decree of adoption, and a copy of the signed agreement must be given to each party. Further, the eligibility compliance requirements of the Adoption Assistance program require the West Virginia Department of Health and Human Resources (DHHR) to determine whether federal monies are spent in accordance with the eligibility guidelines promulgated by the Adoption Assistance and Child Welfare Act of 1980. West Virginia State Code §49-3-1 states that consent by an agency or department to adopt a child must be given and a statement of relinquishment and termination of parental rights must be obtained from the birth parents. The Adoption Assistance Policy Manual states that an Adoption Placement Agreement (SSADP48) must be completed and signatures obtained as part of the preliminary adoption procedures after the parental rights have been terminated if the child is not registered on the Adoption Resource Network (ARN).

2 CFR 200.303 requires that the West Virginia Department of Health and Human Services must “(a) establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the comptroller General of the United States and the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

**Condition:** Ten of the 60 cases reviewed for eligibility did not have documents on file to determine eligibility. One of the 60 cases reviewed for eligibility did not have an IV-E Adoption Assistance Eligibility Determination Form on file. Three of the 60 cases reviewed for eligibility did not have a signed consent form on file. Three of the 60 cases reviewed for eligibility did not have an Adoption Agreement. Five of the 60 cases reviewed for eligibility did not have an Adoption Placement Agreement. One of the 60 cases reviewed for eligibility did not have a date on the Adoption Placement Agreement. One of the 60 cases reviewed for eligibility did not have a signature or date on the Adoption Placement Agreement. Three of the 60 cases reviewed for eligibility had an Adoption Placement Agreement that was signed before parental rights were terminated.

**Questioned Costs:** \$7,530 – \$1,200 related to CFDA #93.659 – Grant Award 1601WVADPT; \$6,330 related to CFDA #93.659 – Grant Award 1701WVADPT

**Context:** The ten instances represent \$7,530 of adoption payments out of a total population of benefit payments tested for eligibility of \$41,788. Total federal expenditures for the Adoption Assistance program were \$39,687,324 for the year ended June 30, 2017.

**Cause:** Management indicated that the lack of inclusion of the proper forms in the case files and inconsistency in the timing of sign-offs were oversights by the caseworker.

**STATE OF WEST VIRGINIA  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
for the Year Ended June 30, 2017**

**2017-015 ELIGIBILITY DOCUMENTATION**

**(Prior Year Findings 2016-022, 2015-029, 2014-024, 2013-040, 2012-59) (continued)**

**Effect:** Documentation supporting the original eligibility determination could not be located. Ineligible or potentially ineligible claims may be paid using federal funds.

**Recommendation:** We recommend that DHHR review the current staffing and training programs of the Adoption Assistance Office to ensure sufficient staff levels are maintained and adequate technical training is provided. Furthermore, the DHHR should establish policies and procedures to ensure that necessary documentation is filed in the adoption case files.

**Views of Responsible Officials and Planned Corrective Actions:** Management acknowledges the finding. See corrective action plan.

**STATE OF WEST VIRGINIA  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
for the Year Ended June 30, 2017**

**2017–016 ELIGIBILITY**

<b>Federal Program Information:</b>	<b>Federal Agency and Program Name</b> U.S. Department of Health and Human Services Medicaid Cluster  Grant Awards 1605WV5MAP, 1605WV5ADM, 1605WVINCT, 1605WVIMPL, 1705WV5MAP, 1705WV5ADM, 1705WVINCT, and 1705WVIMPL	<b>CFDA #</b>  93.775/93.777/ 93.778
<b>Criteria:</b>	<p>2 CFR 200.508(d) requires an auditee must “provide the auditor with access to personnel, accounts, books, records, supporting documentation, and other information as needed for the auditor to perform the audit required by this part.”</p> <p>2 CFR 200.303 requires that the West Virginia Department of Health and Human Services must “(a) establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the comptroller General of the United States and the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).</p>	
<b>Condition:</b>	<p>Two of the 40 cases selected for eligibility testing could not be located. Without this information, eligibility for these two individuals could not be determined.</p>	
<b>Questioned Costs:</b>	<p>\$102 – CFDA #93.778 – Grant Award 1705WV5MAP</p>	
<b>Context:</b>	<p>Total federal expenditures for the Medicaid Cluster for the fiscal year ended June 30, 2017 were \$3,212,354,204. The two cases which could not be located represent \$102 of Medicaid expenditures out of a total population of Medicaid expenditures tested for eligibility of \$46,280.</p>	
<b>Cause:</b>	<p>West Virginia Department of Health and Human Resources (DHHR) does not have adequate internal controls over maintaining of supporting documentation.</p>	
<b>Effect:</b>	<p>Critical data supporting the eligibility compliance requirement is not adequately maintained by DHHR for use by the auditors.</p>	
<b>Recommendation:</b>	<p>DHHR should ensure that all documentation supporting transactions or compliance requirements subject to audit be maintained and readily available if requested. Timely receipt of supporting documentation is crucial for the completion of the audit and determination of eligibility.</p>	
<b>Views of Responsible Officials and Planned Corrective Actions:</b>	<p>Management acknowledges the finding. See corrective action plan.</p>	

**STATE OF WEST VIRGINIA  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
for the Year Ended June 30, 2017**

**2017–017 CASH MANAGEMENT**

<b>Federal Program Information:</b>	<b>Federal Agency and Program Name</b>	<b>CFDA #</b>
	U.S. Department of Homeland Security Disaster Grants – Public Assistance (Presidentially Declared Disasters)	97.036
	Grant Award FEMA–4061-DR-WV	
	Grant Award FEMA–4071-DR-WV	
	Grant Award FEMA–4236-DR-WV	
	Grant Award FEMA–4210-DR-WV	
	Grant Award FEMA–4093-DR-WV	
	Grant Award FEMA–4221-DR-WV	
	Grant Award FEMA–4220-DR-WV	
	Grant Award FEMA–4219-DR-WV	
	Grant Award FEMA–4132-DR-WV	
	Grant Award FEMA–3366-EM-WV	
	Grant Award FEMA–4273-DR-WV	

**Criteria:** 2 CFR 200.305(b)(8) requires that a non-Federal entity must “maintain advance payments of Federal awards in interest-bearing accounts, unless the following apply.

- i. The non-Federal entity receives less than \$120,000 in Federal awards per year.
- ii. The best reasonably available interest-bearing account would not be expected to earn interest in excess of \$500 per year on Federal cash balances.
- iii. The depository would require an average or minimum balance so high that it would not be feasible within the expected Federal and non-Federal cash resources.
- iv. A foreign government or banking system prohibits or precludes interest bearing accounts.”

2 CFR 200.305(b)(9) requires that “interest earned on Federal advance funds deposited in interest-bearing accounts must be remitted annually to the Department of Health and Human Services, Payment Management System.”

2 CFR 200.303 requires that the West Virginia Department of Homeland Security must “(a) establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the comptroller General of the United States and the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

OMB Circular A-133 section 300b requires that the West Virginia Department of Homeland Security is responsible for maintaining “internal control over Federal programs that provides reasonable assurance that management is managing Federal awards in compliance with laws, regulations, and the provisions of contracts or grant agreements that could have a material effect on each of its Federal programs.”

**Condition:** The West Virginia School Building Authority (SBA) is not holding their advance payments of federal awards in interest-bearing accounts.

**STATE OF WEST VIRGINIA**  
**SCHEDULE OF FINDINGS AND QUESTIONED COSTS**  
**for the Year Ended June 30, 2017**

**2017–017 CASH MANAGEMENT**  
**(continued)**

**Questioned Costs:** N/A

**Context:** Total advance payments of federal awards held in non-interest bearing accounts for the Disaster Grants – Public Assistance (Presidentially Declared Disasters) program were \$6,238,757 as of the year ended June 30, 2017.

**Cause:** The SBA was not aware of the requirement to hold advance payments in interest-bearing accounts.

**Effect:** The SBA is not in compliance with the federal rules and regulations regarding cash management. Interest should have been earned on advances and remitted back to the U.S. Department of Homeland Security.

**Recommendation:** We recommend that the SBA develop policies and procedures to ensure that all advance payments of federal awards be held in interest-bearing accounts and to ensure that interest on cash advances is tracked and remitted back to the Federal government.

**Views of Responsible Officials and Planned Corrective Actions:** Management acknowledges the finding. See corrective action plan.



**STATE OF WEST VIRGINIA  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
for the Year Ended June 30, 2017**

**2017–018 SUBRECIPIENT MONITORING  
(Prior Year Finding 2016–024)**

<b>Federal Program Information:</b>	<b>Federal Agency and Program Name</b>	<b>CFDA #</b>
	U.S. Department of Homeland Security Disaster Grants – Public Assistance (Presidentially Declared Disasters)	97.036
	Grant Award FEMA–4061-DR-WV	
	Grant Award FEMA–4071-DR-WV	
	Grant Award FEMA–4236-DR-WV	
	Grant Award FEMA–4210-DR-WV	
	Grant Award FEMA–4093-DR-WV	
	Grant Award FEMA–4221-DR-WV	
	Grant Award FEMA–4220-DR-WV	
	Grant Award FEMA–4219-DR-WV	
	Grant Award FEMA–4132-DR-WV	
	Grant Award FEMA–3366-EM-WV	
	Grant Award FEMA–4273-DR-WV	

**Criteria:** 2 CFR 200.331 establishes pass-through entity responsibilities which include (1) monitoring “the activities of subrecipients as necessary to ensure that Federal awards are used for authorized purposes in compliance with laws, regulations, and the provisions of contracts or grant agreements and that performance goals are achieved,” and (2) ensuring that subrecipients expending \$750,000 or more in Federal awards during the subrecipient’s fiscal year have met the audit requirements for that fiscal year.

2 CFR 200.331(b) requires the West Virginia Department of Homeland Security and Emergency Management to “Evaluate each subrecipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the subaward for purposes of determining the appropriate subrecipient monitoring described in paragraphs (d) and (e) of this section, which may include consideration of such factors as: (1) The subrecipient's prior experience with the same or similar subawards; (2) The results of previous audits including whether or not the subrecipient receives a Single Audit in accordance with Subpart F— Audit Requirements of this part, and the extent to which the same or similar subaward has been audited as a major program; (3) Whether the subrecipient has new personnel or new or substantially changed systems; and (4) The extent and results of Federal awarding agency monitoring (e.g., if the subrecipient also receives Federal awards directly from a Federal awarding agency).”

OMB Circular No. A-133, Subpart D §400 requires a pass-through entity to “monitor the activities of subrecipients as necessary to ensure that federal awards are used for authorized purposes in compliance with laws, regulations, and the provisions of contracts or grant agreements and that performance goals are achieved.” Pass-through entities are required to develop monitoring procedures including programmatic and financial monitoring to ensure subrecipients have used federal funds for authorized purposes.

2 CFR 200.303 requires that the West Virginia Department of Homeland Security must “(a) establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the comptroller General of the United States and the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

**STATE OF WEST VIRGINIA**  
**SCHEDULE OF FINDINGS AND QUESTIONED COSTS**  
**for the Year Ended June 30, 2017**

**2017–018 SUBRECIPIENT MONITORING**  
**(Prior Year Finding 2016–024) (continued)**

OMB Circular A-133 section 300b requires that the West Virginia Homeland Security is responsible for maintaining “internal control over Federal programs that provides reasonable assurance that management is managing Federal awards in compliance with laws, regulations, and the provisions of contracts or grant agreements that could have a material effect on each of its Federal programs.”

**Condition:** We noted the following issues related to subrecipient monitoring for the West Virginia Division of Homeland Security and Emergency Management (DHSEM):

- DHSEM is not documenting programmatic on-site monitoring.
- DHSEM was unable to provide documentation of which subrecipients had audits completed and filed with DHSEM. Further, management indicated that they review completed auditor reports posted to the State Auditor’s website; however, there is no evidence of this review or documentation regarding resolution of any issues identified.
- DHSEM is not completing subrecipient risk assessments.

**Questioned Costs:** Unknown

**Context:** Total federal expenditures for subrecipients and total federal expenditures for the Disaster Grants – Public Assistance (Presidentially Declared Disasters) program were \$47,006,645 and \$90,223,838, respectively, for the year ended June 30, 2017.

**Cause:** Management indicated discussions have been held and they are working on a subrecipient monitoring process, but there is currently no subrecipient monitoring process.

**Effect:** DHSEM does not have effective policies and procedures and evidence to support subrecipient monitoring; therefore, management may not be able to identify issues in a timely manner.

**Recommendation:** DHSEM should develop formalized policies for developing and tracking subrecipient monitoring reports and for receiving and tracking subrecipient audit reports. Additionally, procedures should be established to evaluate and follow-up on any instances of subrecipient compliance or internal control findings to ensure they are resolved in a timely manner.

**Views of Responsible Officials and Planned Corrective Actions:** Management acknowledges the finding. See corrective action plan.

**STATE OF WEST VIRGINIA  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
for the Year Ended June 30, 2017**

**2017–019 SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS  
(Prior Year Finding 2016–027)**

<b>Federal Program Information:</b>	<b>Federal Agency and Program Name</b>	<b>CFDA #</b>
	U.S. Department of Homeland Security Disaster Grants – Public Assistance (Presidentially Declared Disasters)	97.036
	Grant Award FEMA–4061-DR-WV	
	Grant Award FEMA–4071-DR-WV	
	Grant Award FEMA–4236-DR-WV	
	Grant Award FEMA–4210-DR-WV	
	Grant Award FEMA–4093-DR-WV	
	Grant Award FEMA–4221-DR-WV	
	Grant Award FEMA–4220-DR-WV	
	Grant Award FEMA–4219-DR-WV	
	Grant Award FEMA–4132-DR-WV	
	Grant Award FEMA–3366-EM-WV	
	Grant Award FEMA–4273-DR-WV	

**Criteria:** 2 CFR 200.303 requires that the West Virginia Department of Homeland Security must “(a) establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the comptroller General of the United States and the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

OMB Circular A-133 section 300b requires that the West Virginia Department of Homeland Security is responsible for maintaining “internal control over Federal programs that provides reasonable assurance that management is managing Federal awards in compliance with laws, regulations, and the provisions of contracts or grant agreements that could have a material effect on each of its Federal programs.”

**Condition:** The Division of Homeland Security and Emergency Management (DHSEM) and the Division of Highways (DOH) internal controls are not adequate to ensure the Schedule of Expenditures of Federal Awards (SEFA) accurately reports all federal assistance. Our review of the DHSEM SEFA for fiscal year 2017 identified that total disbursements were understated by \$2,513,804, total subrecipient expenditures were overstated by \$2,089,064. Our review of the DOH SEFA for fiscal year 2017 identified that total disbursements were overstated by \$12,820,459.

**Questioned Costs:** N/A

**Context:** Total federal expenditures for DOH Disaster Grants – Public Assistance (Presidentially Declared Disasters) program were \$90,223,838 for the year ended June 30, 2017.

**STATE OF WEST VIRGINIA**  
**SCHEDULE OF FINDINGS AND QUESTIONED COSTS**  
**for the Year Ended June 30, 2017**

**2017–019 SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS**  
**(Prior Year Finding 2016–027) (continued)**

**Cause:** DHSEM and DOH have not implemented adequate internal controls to ensure the SEFA is accurate.

**Effect:** DHSEM and DOH are not properly reporting their federal expenditures and major programs may not be appropriately identified on a timely basis.

**Recommendation:** We recommend that both DHSEM and DOH ensure staff responsible for the preparation of the SEFA have the resources needed to accurately prepare the SEFA.

**Views of Responsible Officials and Planned Corrective Actions:** Management acknowledges the finding. See corrective action plan.

**STATE OF WEST VIRGINIA  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
for the Year Ended June 30, 2017**

**2017–020 INTERNAL CONTROLS OVER REPORTING  
(Prior Year Finding 2016–025)**

<b>Federal Program Information:</b>	<b>Federal Agency and Program Name</b>	<b>CFDA #</b>
	U.S. Department of Homeland Security Disaster Grants – Public Assistance (Presidentially Declared Disasters)	97.036
	Grant Award FEMA–4061-DR-WV	
	Grant Award FEMA–4071-DR-WV	
	Grant Award FEMA–4236-DR-WV	
	Grant Award FEMA–4210-DR-WV	
	Grant Award FEMA–4093-DR-WV	
	Grant Award FEMA–4221-DR-WV	
	Grant Award FEMA–4220-DR-WV	
	Grant Award FEMA–4219-DR-WV	
	Grant Award FEMA–4132-DR-WV	
	Grant Award FEMA–3366-EM-WV	
	Grant Award FEMA–4273-DR-WV	

**Criteria:** 2 CFR 200.303 requires that the West Virginia Department of Health and Human Services must “(a) establish and maintain effective internal control over the Federal award that provides reasonable assurance that the non-Federal entity is managing the Federal award in compliance with Federal statutes, regulations and the terms and conditions of the Federal award. These internal controls should be in compliance with guidance in “Standards for Internal Control in the Federal Government” issued by the comptroller General of the United States and the “Internal Control Integrated Framework”, issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

OMB Circular A-133 section 300b requires that the non-federal entity is responsible for maintaining “internal control over Federal programs that provides reasonable assurance that management is managing Federal awards in compliance with laws, regulations, and the provisions of contracts or grant agreements that could have a material effect on each of its Federal programs.”

**Condition:** Management of the West Virginia Division of Homeland Security and Emergency Management (DHSEM) prepared and submitted the SF-425, *Federal Financial Reports*, without going through an appropriate review and approval process.

**Questioned Costs:** N/A

**Context:** Total federal expenditures for the Disaster Grants – Public Assistance (Presidentially Declared Disasters) program were \$90,223,838, for the year ended June 30, 2017.

**Cause:** DHSEM does not have adequate policies and procedures, including internal controls, in place over the reporting process.

**Effect:** The absence of a review process for reporting could result in DHSEM’s financial records for federal expenditures to be improperly stated.

**Recommendation:** We recommend that DHSEM implement controls over the report submission process. At a minimum, such controls should include a documented review and approval process that ensures reported amounts agree with supporting documentation. We recommend that the review be performed by an individual independent of the data entry process.

**STATE OF WEST VIRGINIA  
SCHEDULE OF FINDINGS AND QUESTIONED COSTS  
for the Year Ended June 30, 2017**

**2017-020 INTERNAL CONTROLS OVER REPORTING  
(Prior Year Finding 2016-025) (continued)**

<b>Views of Responsible Officials and Planned Corrective Actions:</b>	Management acknowledges the finding. See corrective action plan.
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***CORRECTIVE  
ACTION  
PLAN***

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## CORRECTIVE ACTION PLAN FOR THE FISCAL YEAR ENDED JUNE 30, 2017

### CONTACT PERSON

For finding resolution and Single Audit matters, please contact Betsy Chapman, West Virginia Department of Administration, Financial Accounting and Reporting Section, 2101 Washington Street, E., Charleston, WV 25305 (Telephone 304-558-4083 ext. 301). E-mail: [Betsy.Chapman@wv.gov](mailto:Betsy.Chapman@wv.gov). The respective state agency identified in each finding is responsible for the corrective action plan.

#### **2017-001 SPECIAL TESTS AND PROVISIONS – EBT CARD SECURITY Department of Health and Human Resources (DHHR) CFDA Numbers 10.551 and 10.561**

The West Virginia EBT System Security Plan referenced in the finding is prepared and administered by the State's third-party EBT service provider/organization. In accordance with 7 CFR section 274.1(i), the DHHR requires its EBT service organization to obtain an examination by an independent auditor of the service organization regarding the issuance, redemption, and settlement of benefits under the Supplemental Nutrition Assistance Program. The examination must be done at least annually and the report must be completed ninety days after the examination period ends. Subsequent examinations must cover the entire period since the previous examination. The examinations must follow the American Institute of Certified Public Accountants (AICPA) Statement on Standards for Attestation Engagements (SSAE) No. 16, Reporting on Controls at a Service Organization; and the auditor of the service organization is required to issue a report on controls placed in operation and tests of operating effectiveness of controls, which is commonly referred to as a "service organization control (SOC) 1 type 2 report."

Although the most recent SOC 1 report does not provide evidence that the EBT service organization's independent auditors observed the physical security over EBT cards or verified that cards returned from the Postal Service are returned to inventory or destroyed, the SOC 1 does include the other illustrative control objectives and controls described in the Compliance Supplement and includes the following: (1) a description by the service organization's management of its



## CORRECTIVE ACTION PLAN FOR THE FISCAL YEAR ENDED JUNE 30, 2017

system of policies and procedures for providing services to user entities (including control objectives and related controls as they relate to the services provided) throughout the specified period of time; (2) a written assertion by the service organization's management about whether, in all material respects and based on suitable criteria, (a) the aforementioned description fairly presents the system throughout the specified period, (b) the controls were suitably designed throughout the specified period to achieve the control objectives stated in that description, and (c) the controls operated effectively throughout the specified period to achieve those control objectives; and (3) the report of the service auditor, which (a) expresses an opinion on the matters covered in management's written assertion, and (b) includes a description of the auditor's tests of operating effectiveness of controls and the results of those tests. The SOC 1 report submitted by the State's EBT service organization included an unqualified opinion issued by independent auditors. The DHHR will revisit the contract with its EBT service organization, particularly the part concerning the WV EBT System Security Plan and the SOC 1 type 2 reporting requirement, and will revise the contract if there is a potential for improvement.

**2017-002**     **DHHR INFORMATION SYSTEM AND RELATED BUSINESS  
PROCESS CONTROLS**  
**Department of Health and Human Resources (DHHR)**  
**CFDA Numbers 10.551, 10.561, 93.558, 93.568, 93.575, 93.596,**  
**93.658, 93.659, and 93.767**

The DHHR continues to assess the possibility of implementing additional controls related to automatic payments. For the foster care benefit payments that are issued automatically without evidence of someone formally reviewing the payments, this is a long-standing issue that is driven by the business processing rules in place within the DHHR programmatic bureau (Bureau for Children and Families (BCF)). It is not a system issue because the system is simply supporting the business rules requested by the DHHR BCF. Nonetheless, many controls and verifications exist around the establishment of eligibility for Federal financial participation. Supervisor approval is necessary to place a child in a paid foster care



## CORRECTIVE ACTION PLAN FOR THE FISCAL YEAR ENDED JUNE 30, 2017

setting, which in turn will generate a monthly payment, but the DHHR BCF is on record as defending their decision to not require an additional approval process to release each month's payments, as the administrative burden and related cost of requiring a secondary level of review for all case information entered into the system would far outweigh the benefits derived from such a process.

For the foster care benefit payments that are requested and approved by the same person, this too is a long-standing issue that is driven by the business processing rules in place within the DHHR BCF. However, the U.S. Department of Health and Human Services has issued a new requirement that existing Statewide Automated Child Welfare Information System (SACWIS) make modifications or build new systems to conform to a new set of system requirements known as a Comprehensive Child Welfare Information System (CCWIS). The changes went into effect August 2016 and the state has until October 2019 to begin migration or implementation. The CCWIS will replace the SACWIS and the DHHR will be evaluating the new CCWIS and the related control structure to improve the overall internal controls surrounding foster care benefit payments.

For the adoption assistance benefit payments, an approval process does not exist within the system, as this too was a business processing rule established by the DHHR BCF at the time the system was developed and implemented. However, the adoption subsidy function is limited to only a few individuals in the entire state through database and security roles. Since the subsidy is a negotiated benefit that must be declared for the prospective parents, guardian ad-litem and judge to approve and sign on the adoption finalization order, the amount and frequency has already been decided upon and documented for all parties in the adoption agreement. When defining the system requirements for the new CCWIS, the DHHR will work with the DHHR BCF to establish an approval process for adoption assistance benefit payments.



## CORRECTIVE ACTION PLAN FOR THE FISCAL YEAR ENDED JUNE 30, 2017

### 2017-003 PROCUREMENT PROCEDURES

#### Department of Health and Human Resources (DHHR)

**CFDA Numbers 10.551, 10.561, 93.558, 93.568, 93.575, 93.596, 93.658, 93.659, 93.767, 93.775, 93.777, and 93.778**

As background, it is important to note that the policies and procedures referenced within the Criteria section of the finding are statewide policies and procedures, the source of which is the West Virginia Purchasing Division Procedures Handbook (the Purchasing Handbook). Within the Purchasing Handbook, there is a reference to Section 6.7.1 of the Procedures Handbook, which did not clearly define the policies and procedures related to the Criteria that led to this finding.

To address the finding, the West Virginia Purchasing Division agreed to revise Section 6.7.1 of the Procedures Handbook in a manner that will provide additional details surrounding the “subsequent approval” process required for administrative changes to contracts made after the fact (e.g. when adding a renewal/extension year after expiration of the current term). Although bureau-level procurement staff throughout the DHHR are trained and understand the need to process procurement documents in as timely a manner as possible, including but not limited to those documents related to administrative changes to contracts made after the fact, the DHHR recognizes that there is room for improvement internally. Accordingly, the DHHR Office of Purchasing will continue to work with bureau-level procurement staff throughout the DHHR on such matters and will utilize the next few standing monthly purchasing meetings within the DHHR as an opportunity to remind those staff members of the need for timely completion and processing of procurement documents, particularly those related to renewals and other administrative changes to contracts.



## CORRECTIVE ACTION PLAN FOR THE FISCAL YEAR ENDED JUNE 30, 2017

**2017-004 SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS  
Fairmont State University and West Liberty University  
CFDA Numbers 84.007, 84.033, 84.038, 84.063, 84.268, 84.379,  
84.408, 93.264, 93.342, 93.364, and 93.925**

### **Fairmont State University (FSU) response**

The error on the SEFA documentation was isolated to the Perkins Loan Fund reporting. FSU's preparation of the SEFA information includes completion of a spreadsheet to convert revenue and expenditure data from the Banner Finance system from accrual to cash basis. Staff has been adequately trained on the worksheet. The Perkins Loan Program is more involved because it entails several non-cash transactions beyond the Accounts Receivable and Accounts Payable transaction adjustments necessary to convert the other accounts to cash basis. The SEFA report was reviewed; however, ending and beginning cash balances were accurate and therefore, the error was not detected. Once the auditors questioned the amounts, detailed analysis of the account was completed to provide the auditors with the corrected information. FSU is in the process of closing out the Perkins Loan Fund with the Department of Education. FSU believes that this error is isolated and the internal control over the process is adequate. However, the review process will be more thorough in the future.

### **West Liberty University (WLU) response**

The error on the SEFA was isolated to Federal Pell funds. The SEFA report was reviewed and the error was not detected. Once the auditors questioned the amounts, an analysis of the account was performed and the correct information was provided. WLU has implemented new internal control procedures which includes an additional level of SEFA review to the SEFA preparation process, this will ensure accuracy of the SEFA in future periods. WLU believes that this error is isolated.



## CORRECTIVE ACTION PLAN FOR THE FISCAL YEAR ENDED JUNE 30, 2017

### **2017-005 SPECIAL TESTS AND PROVISIONS – RETURN OF TITLE IV FUNDS**

#### **West Virginia State University and Mountwest Community and Technical College**

**CFDA Numbers 84.007, 84.033, 84.038, 84.063, 84.268, 84.379, 84.408, 93.264, 93.342, 93.364, and 93.925**

#### **West Virginia State University (WVSU) response**

WVSU's Office of Student Financial Assistance has established an internal control procedure for Return of Title IV Funds. The Financial Aid Counselor responsible for performing the Return of Title IV calculations will follow the federal policy for calculating the returns for withdrawn students. The Financial Aid Counselor will provide the calculation to the Associate Director for verification. The Associate Director will review the calculations and sign off on the form created for this process. This process will be saved and documented in the Office of Student Financial Assistance's Policy and Procedures Manual.

The former Financial Aid Counselor was in this role from February 2016 – December 2016 and was inadequately trained in the procedure which resulted in a miscalculation of Return of Title IV funds. Since this staff departure, WVSU has hired a new Financial Aid Counselor that began January 2017. This Financial Aid Counselor has received Return of Title IV training and earned a Return of Title IV credential from the National Association of Student Financial Aid Administrators (NASFAA). The Director of Student Financial Assistance will closely monitor the internal control process to ensure WVSU is in compliance with the Return of Title IV federal regulations.

#### **Mountwest Community and Technical College (MCTC) response**

MCTC acknowledges that several factors in its current process resulted in the institution not returning Title IV funds in a timely manner. In an effort to correct this issue, effective September 29, 2017, MCTC changed its procedures for dealing with unearned Title IV funds disbursements. MCTC implemented a weekly reconciliation process to identify unearned Title IV funds posted to student accounts that need





**CORRECTIVE ACTION PLAN  
FOR THE FISCAL YEAR ENDED JUNE 30, 2017**

to be returned. MCTC believes this new process will prevent this finding from recurring in the future.

**2017-006 SPECIAL TESTS AND PROVISIONS – ENROLLMENT REPORTING**

**Northern Community and Technical College, Shepherd University, West Liberty University, and West Virginia University - Parkersburg**

**CFDA Numbers 84.007, 84.033, 84.038, 84.063, 84.268, 84.379, 84.408, 93.264, 93.342, 93.364, and 93.925**

**West Virginia Northern Community and Technical College (Northern) response**

Based on the audit review, Northern, in addition to all its current processes will add a second review of the National Student Clearinghouse enrollment and graduate file by reviewing a random sampling of student enrollment files to confirm that they are included in the file and their enrollment information is reported. This will be done prior to the file being submitted by the Registrar or her designee and then confirmed to the Associate Registrar for the file to be sent.

**Shepherd University (Shepherd) response**

Shepherd has developed additional procedures for internal control of enrollment reporting. The financial aid director and the registrar work together to create an internal control document that begins with the student records staff. The Registrar’s Office continues to send transmissions to the Clearinghouse on a monthly basis, however, when the file is generated for transmission, the student record staff is documenting the work product, discussing said work with the Registrar, who in turn reviews and signs off on the transmission.

**West Liberty University (WLU) response**

WLU has put in place internal controls to check student statuses. Currently, when the report is pulled from Banner, WLU checks 10-15 students randomly from the report to ensure their enrollment status and anticipated graduation date are accurate before reporting to the Clearinghouse. Beginning December 1, 2017, WLU has checked the reports pulled from Banner and no student errors have been identified.



## CORRECTIVE ACTION PLAN FOR THE FISCAL YEAR ENDED JUNE 30, 2017

### **West Virginia University – Parkersburg (WVUP) response**

In April 2017, WVUP implemented a control process in which the records office forwards the confirmation information to the Director of Financial Aid and then the financial aid staff, with National Student Loan Data System (NSLDS) access, reviews enrollment verification submission to make sure it is posted to NSLDS within the required timeframe. In response to this finding, WVUP will implement additional controls to this process, in that the financial aid staff will review all enrollment reporting files submitted by the records staff for accuracy and completeness no less than every 30 days.

### **2017-007 SPECIAL TESTS AND PROVISIONS – BORROWER DATA TRANSMISSION AND RECONCILIATION**

#### **Concord University (Concord)**

**CFDA Numbers 84.007, 84.033, 84.038, 84.063, 84.268, 84.379, 84.408, 93.264, 93.342, 93.364, and 93.925**

Due to numerous staffing changes within the Financial Aid Office at Concord in 2016/2017, loan reconciliations were not completed in a timely manner. Staffing issues within the office have been rectified and reconciliations for 2017/2018 are being completed on a monthly basis. The loan reconciliations are also reviewed by the Director of Financial Aid to ensure timeliness and accuracy.

### **2017-008 ELIGIBILTIIY Division of Rehabilitation Services (DRS)**

**CFDA Number 84.126**

DRS concurs with this finding; however, upon further examination, it was determined that each of these five cases was completed prior to July 2016. Subsequent and in response to a prior period finding, DRS strengthened training and procedures and improved the agency's electronic case management system to ensure compliance with eligibility determination rules. These changes were acknowledged in the DRS response to the Prior Year Finding 2016-012. DRS considers this finding resolved for all cases where eligibility was determined after July 2016.





## CORRECTIVE ACTION PLAN FOR THE FISCAL YEAR ENDED JUNE 30, 2017

**2017-009 SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS  
Division of Rehabilitation Services (DRS)  
CFDA Number 84.126**

DRS submitted a revised draft to State of West Virginia officials for inclusion in the State's draft SEFA prior to the draft being completed by all state agencies and presented to the auditors. The revision was made to segregate one subrecipient award from state expenditures and appropriately report it as subrecipient expenditures on the face of the SEFA. This subrecipient disbursement had been erroneously coded within the accounting system to a code normally used to record federal disbursements. Once DRS became aware of the miscoding, a revised SEFA draft was submitted for reporting purposes. Total federal expenditures were not affected by this revision. Management will implement policies and procedures to ensure all necessary reporting changes are made to the SEFA prior to its submission to FARS for audit. Further, management will communicate the finding to staff to prevent future coding errors. Staff has also undergone "Federal Grant Administration" training to emphasize the importance of proper classification of expenditures.

**2017-010 SPECIAL TESTS AND PROVISIONS - CHILD SUPPORT NON-COOPERATION, PENALTY FOR REFUSAL TO WORK, AND ADULT CUSTODIAL PARENT OF CHILD UNDER SIX WHEN CHILD CARE NOT AVAILABLE  
Department of Health and Human Resources (DHHR)  
CFDA Number 93.558**

In years prior to the current audit period, this finding was caused because the DHHR Bureau for Children and Families (BCF) was unable to provide adequate documentation to the auditors as necessary for the auditors to rely on controls surrounding caseworker training, supervisor approval of third-level sanctions, and notification to the recipient of opportunity to establish good-cause. The finding repeated for the current audit period because the DHHR BCF was again unable to provide adequate documentation to the auditors as necessary for the auditors to rely on controls surrounding caseworker training, but also because the DHHR BCF did not generate populations (surrounding



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## CORRECTIVE ACTION PLAN FOR THE FISCAL YEAR ENDED JUNE 30, 2017

supervisor approval of third-level sanctions and notification to the recipient of opportunity to establish good-cause) in a timely enough manner for the auditors to select samples. Since the auditors did not receive timely populations surrounding supervisor approval of third-level sanctions and notification to the recipient of opportunity to establish good-cause, they were unable to rely on the controls or even test the controls since they did not have populations from which to select samples.

All case workers are required to take the online Blackboard course on the current policies and procedures surrounding sanctions, documented by completion lists for the Blackboard course. All workers must receive the training before taking a WV WORKS caseload. At any point, if changes are made to the policies and procedures surrounding WV WORKS sanctions, a new training module will be developed and added to the Blackboard course and all case workers will be required to complete the new course.

In order to provide populations to the auditors timelier next year, the DHHR BCF will prioritize Single Audit requests accordingly so that documentation related to supervisory approval of third level sanctions and notification to the recipient of opportunity to establish good cause be provided so that evidence of control can be tested appropriately.

Finally, the DHHR BCF will develop and maintain a log of instances in which a supervisor approves his or her own sanction and the DHHR BCF Policy Unit will periodically review the log to ensure the sanctions are reasonable, are applied in accordance with the policies and procedures currently in place within the DHHR BCF (outlined within the West Virginia Income Maintenance Manual), and are documented within the Recipient Automated Payment Information Data System (RAPIDS).



## CORRECTIVE ACTION PLAN FOR THE FISCAL YEAR ENDED JUNE 30, 2017

### **2017-011 ALLOWABILITY AND ELIGIBILITY Department of Health and Human Resources (DHHR) CFDA Number 93.568**

The DHHR Bureau for Children and Families (BCF) did indeed address the conditions that led to the prior year findings (FY 2005 to FY 2016) in December 2016 by making various revisions to the Income Maintenance Manual, the purpose of which was to clarify the exact manner by which a worker is to complete Section IV of the LIHEAP application. During their testing, the auditors identified three of the DFA-LIEAP-1b supplemental forms were not signed by the caseworker. The DHHR BCF plans to address this finding by meeting with the BCF Division of Training; reviewing the DFA-LIEAP-1b supplemental form and layout of the form to determine if changes are required; reviewing the LIEAP training material and online training course; identifying the root cause of the errors (signature omissions); and ultimately determining what procedures must be put into place to prevent future errors, such as reminding workers to pay close attention to all signature requirements and developing checklists and instructions for DFA-LIEAP-1b supplemental forms to be examined for the appropriate signatures prior to scanning the forms into the On-Base system. Once a procedure has been determined, the central office of BCF will develop guidance and send it to field staff via email.

### **2017-012 REPORTING DOCUMENTATION Department of Health and Human Resources (DHHR) CFDA Number 93.568**

The DHHR system, Recipient Automated Payment Information Data System (RAPIDS) that generates the Annual Report on Households Assisted by LIHEAP does not produce an accurate count of LIHEAP households for reporting purposes. The DHHR Bureau for Children and Families (BCF) has engaged a third party, Advanced Public Policy Research Institute for Study and Evaluation (APPRISE). APPRISE is a nonprofit research institute dedicated to collecting and analyzing data and information to assess and improve public programs. APPRISE will review the DHHR BCF's data and report their findings on the LIHEAP Household Report. The DHHR BCF management



## CORRECTIVE ACTION PLAN FOR THE FISCAL YEAR ENDED JUNE 30, 2017

team will then reconcile the RAPIDS data with APPRISE's findings and will work with RAPIDS staff (within the DHHR Office of Management Information Services) to ensure that the correct data is captured and submitted for future reporting periods.

### **2017-013 DISASTER RECOVERY PLAN Department of Health and Human Resources (DHHR) CFDA Numbers 93.575 and 93.596**

Corrective action was taken in August 2017, which was during State Fiscal Year 2018. However, the finding repeated for the Year Ended June 30, 2017 since corrective action had not been taken as of June 30, 2017. To address the finding, the DHHR Bureau for Children and Families utilized the File Cabinet feature in Family and Children Tracking System (FACTS) and instructed the external Resource and Referral Agencies to scan pertinent records into the FACTS File Cabinet for the specific cases. The File Cabinet is a distinct function in FACTS that serves as a simple electronic document management system allowing the storage of both software documents and images of hard copy documents. The function is entirely integrated into the FACTS case record such that a document is permanently attached exclusively to a case/referral/provider record in which it was entered. Since the documents are only found within the focus of the case/referral/provider, access to the contents are secured to only the users that have the security and permissions to access the type of case/referral/provider.

### **2017-014 SPECIAL TESTS AND PROVISIONS – FRAUD DETECTION AND REPAYMENT Department of Health and Human Resources (DHHR) CFDA Numbers 93.575 and 93.596**

The spreadsheet that the DHHR Bureau for Children and Families (BCF) provided to the auditors lists all claims for which a repayment has been received and added to the expenses claimed for the quarter. All improper payments, including fraudulent payments, are repaid to the Federal government. When refunds related to improper payments are received, they are added to the claims for the quarter to ensure



## CORRECTIVE ACTION PLAN FOR THE FISCAL YEAR ENDED JUNE 30, 2017

that the DHHR does not repay the Federal government twice. Claims identified for the previous fiscal year for which repayment has not been received are not included in this spreadsheet. To address the finding and to provide the auditors with a “complete and accurate population” for next year’s audit, the DHHR BCF will add information to the spreadsheet, to include potential fraudulent payment identified for the previous fiscal year which no repayment was received in the current fiscal year; the DHHR BCF will also identify such arrangements not included in the 2017 population.

### **2017-015 ELIGIBILITY DOCUMENTATION Department of Health and Human Resources (DHHR) CFDA Number 93.659**

The DHHR-BCF developed a revised Adoption Subsidy and Services Standard Operating Procedure (SOP) and distributed it on February 14, 2018 to field staff. The SOP focuses on the steps field staff should be taking to ensure subsidy payments and medical cards are entered promptly after an adoption occurs. Furthermore, the SOP discusses the steps that need to be taken to finalize an adoption record, what items are needed in the record, and how to send this completed record to the state office. Finally, the SOP discusses actions the state office will take should the adoption record be missing information. The implementation of this SOP should begin no later than March 1, 2018.

The issues regarding signatures being obtained prior to parental relinquishment is a training topic that will be discussed and implemented in the Blackboard trainings planned for next year. While the past errors that may have occurred with prior year records that cannot be amended, strides have been made to ensure that future records are complete and accurate before going to storage.



## CORRECTIVE ACTION PLAN FOR THE FISCAL YEAR ENDED JUNE 30, 2017

**2017-016 ELIGIBILITY**  
**Department of Health and Human Resources (DHHR)**  
**CFDA Numbers 93.775, 93.777, and 93.778**

The DHHR Bureau for Children and Families (BCF) is responsible for the maintenance of case files and other documentation related to Medicaid eligibility. The DHHR Office of Internal Control and Policy Development (OICPD) understands the importance of maintaining adequate eligibility documentation and providing that documentation timely to the auditors. As such, the DHHR OICPD will discuss the matter with the DHHR BCF, will work with the BCF to enhance their internal controls over the maintenance of eligibility documentation, and will assist the BCF with those efforts if possible.

**2017-017 CASH MANAGEMENT**  
**School Building Authority (SBA)**  
**CFDA Number 97.036**

SBA transferred a portion of monies for Architect and Engineering Fees into an interest bearing custodial account at United National Bank on February 13, 2018. SBA is working with the State Budget Office to transfer the remaining portion. In the future, SBA will not accept federal funds unless a Comprehensive Educational Facilities Plan is in place with the County Boards of Education so that monies can be placed in an interest bearing account.

**2017-018 SUBRECIPEINT MONITORING**  
**Division of Homeland Security and Emergency Management (DHSEM)**  
**CFDA Number 97.036**

DHSEM developed and implemented during September 2017, multiple policies and procedures regarding the monitoring of subrecipients. The policies and procedures include a guide for grant monitoring, a policy and procedure for risk assessment, and a policy for post-site correspondence, monitoring letter and improvement plans. These policies and procedures were submitted to Federal Emergency Management Agency (FEMA) for review and approval. DHSEM has





## CORRECTIVE ACTION PLAN FOR THE FISCAL YEAR ENDED JUNE 30, 2017

contracted with a CPA firm to assist in the completion of monitoring and DHSEM has plans to designate a single employee solely responsible for subrecipient monitoring of the public assistance grants.

**2017-019 SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS  
Department of Highways and Division of Homeland Security  
and Emergency Management  
CFDA Number 97.036**

**Division of Homeland Security and Emergency Management  
(DHSEM) response**

DHSEM will develop and implement a policy to provide for the periodic reconciliation of federal funds. DHSEM will also educate employees of the administrative staff on the proper use of the State's ERP system, wvOASIS, and the elements of the SEFA.

**Department of Highways (DOH) response**

The DOH will update its current policies and procedures to enhance and strengthen the SEFA preparation process. These changes will include additional year-end report reviews, and an additional level of supervisory review prior to submission of the SEFA.

**2017-020 INTERNAL CONTROLS OVER REPORTING  
Division of Homeland Security and Emergency Management  
(DHSEM)  
CFDA Number 97.036**

DHSEM has developed and implemented a policy for internal controls over the submission of federal financial reports (SF-425) during September 2017. The policy directs that all FEMA Reports be prepared by one individual and submitted by another. The individual preparing the report is to provide full documentation to the reviewer for purposes of ensuring accurate reporting information. This policy was submitted to FEMA for review and approval.



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## CORRECTIVE ACTION PLAN FOR THE FISCAL YEAR ENDED JUNE 30, 2017

**2017-021 CASH MANAGEMENT MONITORING FINDING**  
**Division of Homeland Security and Emergency Management**  
**(DHSEM)**  
**CFDA Number 97.036**

DHSEM worked with the Division of Highways to recover the funds that were drawn down prior to work completion. DHSEM returned these funds to FEMA and the monitoring finding's status was noted as closed as of December 13, 2017. DHSEM has implemented procedures that facilitate communication between DHSEM administration and DHSEM's Public Assistance Recovery Officer. As projects move through final inspection, DHSEM administration and DHSEM's public assistance recovery officer will reconcile payments made on the project to the actual amount of the project to ensure overpayments have not occurred.



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***SUMMARY  
SCHEDULE OF  
PRIOR AUDIT  
FINDINGS***

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**SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS  
FOR THE FISCAL YEAR ENDED JUNE 30, 2017**

**2016-001 FINANCIAL STATEMENT CLOSE PROCESS**  
**2015-003 Overall State**  
**2014-004 CFDA Number Not Applicable**  
**Resolved**

Corrective action taken in FY 2017.

**2016-002 SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS**  
**2015-004 Department of Administration - Overall State**  
**2014-005 CFDA Number Not Applicable**  
**2013-003 Resolved**  
**2012-5**  
**2011-4**  
**2010-5**  
**2009-11**  
**2008-31**  
**2007-32**  
**2006-9**  
**2005-14**  
**2004-72**  
**2003-71**

Corrective action taken in FY 2017.

**2016-003 REPORTING**  
**WORKFORCE West Virginia**  
**CFDA Number 17.225**  
**Resolved**

Corrective action taken in FY 2017.

**2016-004 CASH MANAGEMENT**  
**WORKFORCE West Virginia**  
**CFDA Number 17.277**  
**Resolved**

Corrective action taken in FY 2017.



**SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS  
FOR THE FISCAL YEAR ENDED JUNE 30, 2017**

**2016-005 INADEQUATE POLICIES AND PROCEDURES OVER  
REPORTING AND SUBRECIPIENT MONITORING  
WORKFORCE West Virginia  
CFDA Number 17.277  
Resolved**

Corrective action taken in FY 2017.

**2016-006 SPECIAL TESTS AND PROVISIONS – BORROWER DATA  
TRANSMISSION AND RECONCILIATION  
Shepherd University and West Virginia University  
CFDA Numbers 87.007, 84.033, 84.038, 84.063, 84.268, 84.379,  
93.264, 93.342, and 93.364**

While certain college/universities identified in the prior year finding resolved this matter, Concord University had a finding in the current year. This finding is only partially resolved because each university/college is only responsible for their own internal controls and the updated controls have not been implemented at the above institutions. See current year finding 2017-007 and the related corrective action plan.

**Shepherd University (Shepherd) response  
Resolved**

Shepherd historically has an informally documented monthly reconciliation plan in place for direct loans. A notebook is kept with information from every month for the academic year. It is a two-step process with the financial aid manager initiating the reconciliation using Direct Loan (DL) tools. All discrepancies are reviewed and corrected by the director using Banner and Common Origination and Disbursement (COD). Beginning in 2016-2017, Shepherd has stopped using the DL tools for reconciliation and has formalized the two-step process with the financial aid manager initiating the reconciliation on a monthly basis using Banner and COD. All discrepancies are reviewed and corrected by the senior financial aid counselor. To document the review, the reconciliation preparer and reviewer are documenting their correspondence via email communication.



**SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS  
FOR THE FISCAL YEAR ENDED JUNE 30, 2017**

Shepherd’s policy and procedures have been updated to reflect these changes.

**West Virginia University (WVU) response  
Resolved**

WVU’s monthly direct loan reconciliation procedures were reviewed and enhanced to include a supervisor’s review and second approval. The new procedures were implemented in FY 2017 and were retroactively applied to the beginning of the academic year.

**2016-007 CASH MANAGEMENT  
Mountwest Community and Technical College  
CFDA Numbers 87.007, 84.033, 84.038, 84.063, 84.268, 84.379,  
93.264, 93.342, and 93.364  
Resolved**

Signatures were placed on documents providing evidence of the review process beginning October 1, 2016.

**2016-008 SPECIAL TESTS AND PROVISIONS – REPORTING  
2015-015 ENROLLMENT  
2014-011 BlueRidge Community and Technical College, Mountwest  
2013-028 Community and Technical College, New River Community and  
2012-43 Technical College, West Virginia Northern Community and  
2012-47 Technical College, West Virginia State University, Shepherd  
2012-49 University, West Liberty University, and West Virginia  
2011-22 University - Parkersburg  
CFDA Numbers 84.007, 84.033, 84.038, 84.063, 84.268, 84.379,  
93.264, 93.342, and 93.364  
Partially Resolved**

While certain colleges/universities identified in the prior year finding resolved this matter, the following colleges/universities had a finding in the current year: West Virginia Northern Community and Technical College, Shepherd University, West Liberty University, and West Virginia University – Parkersburg. This finding is only partially resolved because each university/college is only responsible for their



## SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS FOR THE FISCAL YEAR ENDED JUNE 30, 2017

own internal controls and the updated controls have not been implemented at the above institutions. See current year finding 2017-006 and the related corrective action plan.

### **2016-009 PROGRAM INCOME**

**West Virginia State University**

**CFDA Numbers 87.007, 84.033, 84.038, 84.063, 84.268, 84.379, 93.264, 93.342, and 93.364**

**Resolved**

Beginning in October 2017, WVSU is working on strengthening the control procedures by printing and signing all reconciled monthly ECSI (Perkins Loans) reports. Previously WVSU was not formally documenting the monthly report reconciliation that was being performed by viewing the reports via the web and the ECSI system for accuracy.

### **2016-010 SPECIAL TESTS AND PROVISIONS – RETURN OF TITLE IV FUNDS**

**BlueRidge Community and Technical College, West Virginia State University, Shepherd University, West Virginia University - Parkersburg**

**CFDA Numbers 87.007, 84.033, 84.038, 84.063, 84.268, 84.379, 93.264, 93.342, and 93.364**

While certain colleges/universities identified in the prior year finding resolved this matter, the following colleges/universities had a finding in the current year: West Virginia State University and Mountwest Community and Technical College. This finding is only partially resolved because each university/college is only responsible for their own internal controls and the updated controls have not been implemented at the above institutions. See current year finding 2017-005 and the related corrective action plan.



## SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS FOR THE FISCAL YEAR ENDED JUNE 30, 2017

### **BlueRidge response** **Resolved**

In October 2016, BlueRidge improved the internal control process regarding the calculation of the return to Title IV funds process. The Financial Aid (FA) Director will systematically review accounts for the need to conduct a Title IV aid return. For those needing a return, the FA counselors will complete the return process utilizing the return worksheets on Financial Aid Administrators (FAA) Access. Once the worksheet is complete, the FA Director will conduct a quality review and the FA Counselors will submit the return and funding information to the Finance Office. The Senior Counselor will update accounts as appropriate. This notification is also provided to the FA Director and the Vice President of Enrollment Management. The FA office will notify students of the return process by providing the student with a copy of the return worksheet.

### **WVSU response** **Partially Resolved**

The Office of Student Financial Assistance has established an internal control procedure for Return of Title IV Funds. A new Financial Aid Counselor who began her duties in January 2017 is responsible for performing the Return of Title IV calculations and will follow the policy for calculating the returns for withdrawn students. The Financial Aid Counselor will provide the calculation to the Associate Director for verification. The Associate Director will review the calculations and sign off on the form created for this process. This process will be saved and documented in the Office of Student Financial Assistance's Policy and Procedures Manual.

### **Shepherd response** **Resolved**

In October 2016, Shepherd created a Return of Title IV Review Form to be used by a financial aid counselor when the calculation is completed. The review form is signed by the counselor that prepared the calculation and all documentation is given to the senior financial



**SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS  
 FOR THE FISCAL YEAR ENDED JUNE 30, 2017**

aid counselor to review. Once the second review is complete, the review form is signed by the senior counselor and a letter is generated for the director to review and sign. Shepherd’s policy and procedures have been updated to reflect these changes.

**WVU Parkersburg response  
 Resolved**

WVUP implemented a process in May 2017 in which every Return to Title IV calculation is reviewed and signed off by 2 members of financial aid staff, to ensure all information and calculations are complete and correct.

**2016-011 SPECIAL TESTS AND PROVISIONS – VERIFICATION  
 Mountwest Community and Technical College  
 CFDA Numbers 87.007, 84.033, 84.038, 84.063, 84.268, 84.379,  
 93.264, 93.342, and 93.364  
 Resolved**

Effective October 1, 2016, Mountwest employees will initial the internal file worksheets to document that the initial review was completed. The second reviewer will document the file with their initials to verify that a second review was completed. The Internal Professional Judgement Worksheet will be used and annotated with initials for each professional judgement decision.

**2016-012 ELIGIBILTIIY  
 2015-018 Division of Rehabilitation Services (DRS)  
 CFDA Number 84.126  
 Partially Resolved**

DRS strengthened training and procedures and improved the agency’s electronic case management system to ensure compliance with eligibility determination rules. These changes were acknowledged in the DRS response to the Prior Year Finding 2016-012. DRS considers this finding resolved for all cases where eligibility was determined after July 2016. See current year finding 2017-008.



**SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS  
FOR THE FISCAL YEAR ENDED JUNE 30, 2017**

**2016-013**    **WVDRS TRANSACTION APPROVAL CONTROLS**  
**2015-020**    **Division of Rehabilitation Services**  
**CFDA Numbers 84.126**  
**Resolved**

Corrective action taken in FY 2017.

**2016-014**    **SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS**  
**Department of Health and Human Resources**  
**CFDA Numbers 93.094**  
**Resolved**

Corrective action taken in FY 2017.

**2016-015**    **ELIGIBILITY**  
**Department of Health and Human Resources**  
**CFDA Number 93.558**  
**Resolved**

Corrective action taken in FY 2017.

**2016-016**    **SPECIAL TESTS AND PROVISIONS - SANCTIONS**  
**2015-024**    **Department of Health and Human Resources**  
**2014-018**    **CFDA Number 93.558**  
**2013-036**    **Partially Resolved**  
**2012-56**  
**2011-44**  
**2010-41**

In response to the same finding for fiscal year 2011 (2011-44), the DHHR discussed this matter with the United States Department of Health and Human Services, Administration for Children and Families (ACF) in fiscal year 2014, whereby the ACF reviewed the policies and procedures in effect within the DHHR BCF surrounding the issuance and removal of sanctions and determined the policies and procedures to be adequate. The complimentary controls referenced by the auditors in the condition section of the finding are based on the same policies and procedures reviewed and approved by the ACF. However, given that the control documentation provided to the





**SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS  
 FOR THE FISCAL YEAR ENDED JUNE 30, 2017**

auditors was not adequate to ensure that sanctions could not be issued or removed against TANF recipients in error or without appropriate cause, the DHHR will reexamine all the correspondence from prior years regarding the complimentary controls and will consider whether it is necessary for the BCF to develop any new policies and procedures as a means to enhance said controls and thus show greater evidence of control activity prior to the issuance or removal of sanctions. See current year finding 2017-010.

- 2016-017**
  - 2015-025**
  - 2014-016**
  - 2013-034**
  - 2012-51**
  - 2011-46**
  - 2010-43**
  - 2009-43**
  - 2008-55**
- DHHR INFORMATION SYSTEM AND RELATED  
 BUSINESS PROCESS CONTROLS**  
**Department of Health and Human Resources**  
**CFDA Numbers 10.551/10.561, 93.558, 93.775/93.777/93.778**  
**and ARRA 93.778, 93.568, 93.575/93.596, 93.767, 93.659,**  
**and 93.658**  
**Partially Resolved**

The DHHR is currently in the process of developing an information system that will replace the Family and Children Tracking System (FACTS), the Recipient Automated Payment Information Data System (RAPIDS), and the Online Support Collection and Reporting (OSCAR) systems that are currently in use within the DHHR. The new information system will also eliminate many of the business processing rules currently in place within the DHHR Bureau for Children and Families and will have controls embedded within the system that should address many if not all the auditors' concerns surrounding the approval of payments. The estimated date for implementation of the new information system is July 1, 2020. See current year finding 2017-002.



**SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS  
 FOR THE FISCAL YEAR ENDED JUNE 30, 2017**

- 2016-018      ALLOWABILITY AND ELIGIBILITY**
- 2015-026      Department of Health and Human Resources**
- 2014-021      CFDA Number 93.568**
- 2013-037      Partially Resolved**
- 2012-57**
- 2011-50**
- 2010-46**
- 2009-48**
- 2008-59**
- 2007-59**
- 2006-43**
- 2005-50**

The DHHR BCF addressed the finding in December 2016, by making various revisions to the Income Maintenance Manual, the purpose of which was to clarify the exact manner by which a worker is to complete Section IV of the Low Income Home Energy Assistance Program (LIHEAP) application. See current year finding 2017-011.

- 2016-019      REPORTING DOCUMENTATION**
- Department of Health and Human Resources**
- CFDA Number 93.568**
- Partially Resolved**

The DHHR system, Recipient Automated Payment Information Data System (RAPIDS), that generates the Annual Report on Households Assisted by LIHEAP does not produce an accurate count of LIHEAP households for reporting purposes. The DHHR Bureau for Children and Families (BCF) has engaged a third party, Advanced Public Policy Research Institute for Study and Evaluation (APPRISE). APPRISE is a nonprofit research institute dedicated to collecting and analyzing data and information to assess and improve public programs. APPRISE will review the DHHR BCF's data and report their findings on the LIHEAP Household Report. The DHHR BCF management team will then reconcile the RAPIDS data with APPRISE's findings and will work with RAPIDS staff (within the DHHR Office of Management Information Services) to ensure that the correct data is captured and submitted for future reporting periods. See current year finding 2017-012.



**SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS  
 FOR THE FISCAL YEAR ENDED JUNE 30, 2017**

- 2016-020 DISASTER RECOVERY PLAN**
- 2015-027 Department of Health and Human Resources**
- 2014-022 CFDA Numbers 93.596 and 93.575**
- 2013-038 Partially Resolved**
- 2012-58**
- 2011-51**
- 2010-47**
- 2009-50**
- 2008-61**
- 2007-62**
- 2006-45**

Corrective action was taken in August 2017, which was during State Fiscal Year 2018. However, the finding repeated for the Year Ended June 30, 2017 since corrective action had not been taken as of June 30, 2017. To address the finding, the DHHR Bureau for Children and Families utilized the File Cabinet feature in Family and Children Tracking System (FACTS) and instructed the external Resource and Referral Agencies to scan pertinent records into the FACTS File Cabinet for the specific cases. The File Cabinet is a distinct function in FACTS that serves as a simple electronic document management system allowing the storage of both software documents and images of hard copy documents. The function is entirely integrated into the FACTS case record such that a document is permanently attached exclusively to a case/referral/provider record in which it was entered. Since the documents are only found within the focus of the case/referral/provider, access to the contents are secured to only the users that have the security and permissions to access the type of case/referral/provider. See current year finding 2017-013.

- 2016-021 SPECIAL TESTS AND PROVISIONS – FRAUD DETECTION AND REPAYMENT CONTROLS**
- Department of Health and Human Resources**
- CFDA Numbers 93.575 and 93.596**
- Partially Resolved**

The spreadsheet that the DHHR Bureau for Children and Families (BCF) provided to the auditors lists all claims for which a repayment



**SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS  
 FOR THE FISCAL YEAR ENDED JUNE 30, 2017**

has been received and added to the expenses claimed for the quarter. All improper payments, including fraudulent payments, are repaid to the Federal government. When refunds related to improper payments are received, they are added to the claims for the quarter to ensure that the DHHR does not repay the Federal government twice. Claims identified for the previous fiscal year for which repayment has not been received are not included in this spreadsheet. To address the finding and to provide the auditors with a “complete and accurate population” for next year’s audit, the DHHR BCF will add information to the spreadsheet, to include potential fraudulent payment identified for the previous fiscal year which no repayment was received in the current fiscal year; the DHHR BCF will also identify such arrangements not included in the 2017 population. See current year finding 2017-014.

- 2016-022 ELIGIBILITY DOCUMENTATION**
- 2015-029 Department of Health and Human Resources**
- 2014-024 CFDA Number 93.659**
- 2013-040 Partially Resolved**
- 2012-59**

The DHHR-BCF developed a revised Adoption Subsidy and Services Standard Operating Procedure (SOP) and distributed it on February 14, 2018 to field staff. The SOP focuses on the steps field staff should be taking to ensure subsidy payments and medical cards are entered promptly after an adoption occurs. Furthermore, the SOP discusses the steps that need to be taken to finalize an adoption record, what items are needed in the record, and how to send this completed record to the state office. Finally, the SOP discusses actions the state office will take should the adoption record be missing information. The implementation of this SOP should begin no later than March 1, 2018.

The issues regarding signatures being obtained prior to parental relinquishment is a training topic that will be discussed and implemented in the Blackboard trainings planned for next year. While the past errors that may have occurred with documentation cannot be fixed, strides have been made to ensure that future records are complete and accurate before going to storage. See current year finding 2017-015.



## SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS FOR THE FISCAL YEAR ENDED JUNE 30, 2017

**2016-023      REPORTING COMPLIANCE**  
**Division of Rehabilitation Services**  
**CFDA Number 96.001**  
**Resolved**

Corrective action taken in FY 2017.

**2016-024      SUBRECIPEINT MONITORING**  
**Division of Homeland Security and Emergency Management**  
**CFDA Number 97.036**  
**Partially Resolved**

Division of Homeland Security and Emergency Management (DHSEM) developed and implemented during September 2017, multiple policies and procedures regarding the monitoring of subrecipients. The policies and procedures include a guide for grant monitoring, a policy and procedure for risk assessment, and a policy for post-site correspondence, monitoring letter and improvement plans. These policies and procedures were submitted to Federal Emergency Management Agency (FEMA) for review and approval. DHSEM has contracted with a CPA firm to assist in the completion of monitoring and DHSEM has plans to designate a single employee solely responsible for subrecipient monitoring of the public assistance grants. See current year finding 2017-018.

**2016-025      INTERNAL CONTROLS OVER REPORTING**  
**Division of Homeland Security and Emergency Management**  
**CFDA Number 97.036**  
**Partially Resolved**

DHSEM has developed and implemented a policy for internal controls over the submission of federal financial reports (SF-425) during September 2017. The policy directs that all FEMA Reports be prepared by one individual and reviewed by another. The individual preparing the report is to provide full documentation to the reviewer for purposes of ensuring accurate reporting information. This policy was submitted to FEMA for review and approval. See current year finding 2017-020.



## SUMMARY SCHEDULE OF PRIOR AUDIT FINDINGS FOR THE FISCAL YEAR ENDED JUNE 30, 2017

**2016-026 CASH MANAGEMENT**  
**Department of Highways**  
**CFDA Number 97.036**  
**Resolved**

Corrective action taken in FY 2017.

**2016-027 SCHEDULE OF EXPENDITURES OF FEDERAL AWARDS**  
**Department of Highways (DOH)**  
**CFDA Number 97.036**

The DOH updated its current policies and procedures on July 1, 2017 to enhance and strengthen the SEFA preparation process. These changes will include additional year-end report reviews, and an additional level of supervisory review prior to submission of the SEFA. See current year finding 2017-019.

**2016-028 MATCHING**  
**Division of Homeland Security and Emergency Management**  
**CFDA Number 97.036**  
**Resolved**

Corrective action taken in FY 2017.

**2016-029 SPECIAL TESTS AND PROVISIONS – PROJECT ACCOUNTING**  
**Division of Homeland Security and Emergency Management**  
**CFDA Number 97.036**  
**Resolved**

Corrective action taken in FY 2017.

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