

SECTION 600

Training

601 IMPORTANCE OF TRAINING

Due to the technical and changing nature of the Weatherization Assistance Program (WAP), a high priority has been placed on the training aspect of the program. In Indiana, Weatherization specific training is offered by the Indiana Community Action Association (INCAA). Lead based paint risk assessor/inspector training is offered by the Environmental Management Institute (EMI). Classes of both organizations combine lecture, hands-on and applied field demonstrations of the concepts discussed in the classroom in order to provide theory and application to weatherization staff and contractors.

Technical assistance which provides guidance on specific problems found in the field is a strong component of the WAP. Training and technical assistance in the field may be provided by either INCAA training staff or IHCDAs personnel depending on the issue and/or contractual commitments.

Agencies are strongly encouraged to take full advantage of the opportunities available to them for program enhancement and improvement through training and technical assistance. IHCDAs has taken a strong position that the Weatherization Assistance Program will maintain its level of technical expertise only through the continued emphasis on its Training and Technical Assistance component.

Training and monitoring are the tools that IHCDAs uses to ensure that weatherization measures are applied consistently, and that Indiana maintains a high standard of work. Along with increasing flexibility in the combining of funds, IHCDAs has implemented training requirements to help ensure that monies provided are used on weatherization measures that will enhance energy savings. By including all staff and contractors in this process, it will ensure organizational performance while providing the means for evaluating our achievements, as well as developing plans to improve upon our successes.

Subgrantees can find Indiana's newly updated SWS-aligned Field Guide, Health and Safety Plan guidance, and 2018 State Plan at <https://www.in.gov/myihcda/weatherization.htm>. INCAA will be providing training in PY2018-19 on all guidance.

602 MINIMUM TRAINING REQUIREMENTS

Working in conjunction with DOE's Weatherization Job Tasks Analyses IHCDAs, in cooperation with INCAA, has developed Indiana Weatherization Competency Standards.

The following three categories of workers exist in Indiana's Weatherization Competency Standards:

- Energy Auditor
- Retrofit Installers (Shell and Mechanical)
- Crew Leaders (Required for Shell only)
- Crew Leaders will be allowed to re-certify both their Retro Shell and Crew Leader Competency as a combined certification as long as both Crew Leader and Retro Shell ISV certifications are current at time of their re-certification.

The following certification(s) are required by DOE with the training and certification process available at INCAA:

- DOE Quality Control Inspector (QCI)

The following certification(s) are offered at INCAA in addition to the requirements above:

- DOE Energy Auditor

Individuals performing energy audits in Indiana's Weatherization Assistance Program must either be Indiana Competent as an Energy Auditor or possess DOE/BPI's Energy Auditor Certification.

Indiana Weatherization Competency Standards:

Those required to pass competency standards:

- All individuals working within the Indiana Weatherization Assistance Program in the categories of Energy Auditor, Retrofit Installer (Shell and Mechanical), Crew Leader and Quality Control Inspector are required to pass and maintain competency or certification in the category in which they work.
- Individuals needing or desiring to perform final inspections in Indiana must obtain and maintain the QCI certification through the Building Performance Institute (BPI).
- All individuals desiring to become Indiana Weatherization Competent must be working with/for (staff and/or contractors) an IHCD funded Subgrantee (with Weatherization funding) in order to train for and achieve being Indiana Weatherization Competent.
- Intake staff, fiscal staff, and clerical staff **are not** required to pass competency training.
- Workers who are performing limited, rarely utilized services such as specialty plumbers, exterminators, mold remediation, or specialty electricians **are not** required to pass competency training.
- Specialty contractors whose work results in changes to exhaust systems, ventilation systems or the tightening of the home **are required** to complete the Daily Safety Test Out (DSTO) training at INCAA and **are required** to complete a DSTO form upon completing their work on the home.
- IHCD **does allow** the use of a Mechanical Helper. The Mechanical Helper is defined as an individual who only performs tasks such as helping remove old heating equipment

and/or ductwork, assist with carrying tools and equipment to/from the home, and other work not related to testing, commissioning or adjusting heating systems. The Mechanical Helper is not allowed to be left at the home unsupervised, must be working with an Indiana Competent Retrofit Installer-Mechanical technician and is not allowed to perform any diagnostic testing, CAZ testing, or adjustments to/of heating systems. Subgrantees are responsible for tracking the names and use of Mechanical Helpers. Subgrantees must also ensure that the names of Mechanical Helpers are listed in the client file for each home worked in as required in Section 607 below.

- It is the Subgrantee and the certified/competent technician's responsibility to ensure that the Mechanical Helper is properly supervised and utilized.
- The Mechanical Helper must have a background check performed prior to working in a client's home as outlined in section 610.

603 TRAINING REQUIREMENTS

Testing will be performed at the end of each class offered through INCAA. This testing is required as part of INCAA being a nationally accredited training center and follow DOE's National Training/Certification Program. Test results will be tracked by INCAA and available to IHCD, as well as the Subgrantee Weatherization Program Manager and Subgrantee Executive Director upon request.

Subgrantee Executive Directors and Weatherization Program Managers may only request and view testing results for their employees or sub-contractors.

Time Limits for becoming Indiana Weatherization Competent

- All Subgrantee staff/contractor new employees will have **nine** months commencing 45 days from their date of hire to become Indiana Weatherization Competent in the categories of Energy Auditor, Retrofit Installer (Shell and/or Mechanical) and Crew Leader.
- Subgrantees are allowed to enroll new staff/contractor employees in training prior to the expiration of the 45 days if they choose to do so. This decision should be based upon the expectation that the new staff/contractor employee will be retained in their new position.
 - Subgrantees may shorten the 45-day grace period to 30 days provided this shortened time period is approved by IHCD and included in the Subgrantee's policy and human resources manuals.
- All Subgrantee staff/contractor employees must have a completed background check prior to being allowed to work in/on client homes. IHCD's specific requirements for background checks are detailed in Section 610 below.

- **Individuals not identified as working with an IHEDA funded Subgrantee providing Weatherization services will not be allowed to participate in training or testing toward becoming Indiana Weatherization Competent.**
 - Exceptions to this requirement will only be allowed on a case by case basis. Should an exception be desired or felt necessary, permission from IHEDA must be granted prior to attending training and pursuing competency verification.

Testing Parameters

- Becoming Indiana Weatherization Competent will require passing both a written exam and a skills verification event. The skills verification event will involve performing skill sets associated with the competency category being tested.
 - Both the written test and the skills verification event are pass/fail. There will be no provisional results given.
 - Should re-testing of the skills verification be necessary only the portion failed by the candidate will need re-tested.
 - Should re-testing of the written test be necessary, the entire written test must be completed. Certain categories of competency utilize more than one test. For these competencies candidates will be given a different test on their second attempt.
 - All testing results will be sent to the candidate, the Subgrantee Weatherization Program Manager and the Subgrantee Executive Director.
 - Candidates will have **three** opportunities to pass all testing to become Indiana Weatherization Competent. Individuals that fail to pass competency on the **third** attempt will be required to submit a formal request to IHEDA for reapplication to work in Indiana’s Weatherization Assistance Program for consideration.
 - If the individual testing for one competency holds another competency, yet fails the second attempt for the additional competency, the individual would be able to continue working in the competency that has been achieved. For example: if an individual has become Indiana Weatherization Competent as a Retrofit Installer Shell, This same individual tests to become a Crew Leader but fails both attempts. This individual would be allowed to work in Indiana’s Weatherization Assistance Program as a Retrofit Installer Shell but not perform the duties of a Crew Leader.
 - Should a second attempt at passing competence be needed, the second attempt shall take place no later than **three months** following the initial attempt.
 - IHEDA will only pay for the first attempt for an individual to pass competency. In the case of a failed attempt, the Subgrantee or contractor will be responsible **for the cost of any subsequent test procedures.**
 - Competency testing must take place no later than the conclusion of the nine-month training period commencing 45 days from their hire date.

Quality Control Inspector (QCI) through BPI

- Candidates needing to become QCI Certified must complete the following steps:
 - Apply for a letter of permission from BPI to sit for testing
 - Pass both written and skills verification testing according to BPI and DOE requirements
- Testing Perimeters
 - The QCI written test is performed on a lap top computer at INCAA and requires the letter of permission from BPI
 - Candidates have six opportunities within a twelve-month time period, commencing at the date of the first test, to be successful at the written test. Should the candidate fail the written test six times they are ineligible to test again until the twelve- month time period has elapsed.
 - IHEDA will only cover the expense for the first test. Should additional attempts at testing be necessary the cost of testing will be the responsibility of the contractor, the Subgrantee or the individual taking the test.

Class Recommendations/Requirements

- Individuals new to Weatherization attempting to obtain the Retrofit Installer Shell Competency are strongly encouraged to complete Daily Safety Test-Out (DSTO) training prior to performing skills verification testing.
- Individuals attempting to obtain the Energy Auditor Competency or DOE's Energy Auditor Certification are strongly encouraged to complete Mechanical Systems for Auditors prior to performing skills verification testing.
- Individuals pursuing the Retrofit Installer Mechanical Competency are **required** to complete the CAZ Pressure Diagnostics for Auditors and Heating Technicians training through INCAA.

604 DURATION, MAINTENANCE, AND RECORDKEEPING

- Each Indiana competency will be in effect for three years
 - At the end of the three year duration each competent individual must re-test and pass the skills verification portion of their competency (s).
 - Each candidate will have two opportunities to pass the skills verification portion of their competency (s).
 - IHEDA will only pay for the first attempt for an individual to pass competency. In the case of a failed attempt, the Subgrantee or contractor will be responsible for the cost of the second testing event.

- At the end of three years, individuals holding competencies as both Retrofit Installer Shell and Crew Leader will only need to test for and pass the Crew Leader competency. Passing the Crew Leader skills portion will initiate the next three year cycle for both the Retrofit Installer Shell and Crew Leader competencies. From that point forward, both competencies will have the same expiration dates.
 - Individuals are required to perform the Crew Leader testing based upon which competency expires first. For example, an individual's Retrofit Shell Competency expires on April 15, 2016 while their Crew Leader expires on June 30, 2016. This individual is required to perform the Crew Leader testing PRIOR to the April 15th date – it is the competency that expires first.
- The BPI Quality Control Inspector certification is also in effect for three years. All BPI requirements regarding the QCI certification must be followed to maintain this certification.
- All Indiana Weatherization Competent, QCI and BPI certified individuals are required to attend an Annual Competency Maintenance Training in years two and three of their competency(s) or BPI Certification.

604.1 CONTINUING EDUCATION UNITS (CEUs)

IHCDA is reviewing current CEU requirements and may issue additional guidance to Subgrantees during PY 2018-2019.

The requirement of Continuing Education Units is designed to ensure that Indiana's Competent and Certified individuals increase their knowledge base beyond what is necessary to obtain the competency. This is one way that IHCDA is helping to ensure that each client's home receives the highest quality of Weatherization services possible.

All Indiana Weatherization Competent individuals must acquire 16 CEUs per year (April 1 – March 31).

- Record of CEUs **must** be tracked by the **Subgrantee** for their Weatherization staff, crews, and contractors.
- The 16 CEUs requirement is per individual and not per competency. For example, an individual holds competencies for both Retrofit Installer Shell and Energy Auditor. This individual is only required to obtain 16 CEUs.
- Subgrantees must track the training that was taken connected to the claimed CEUs for review at time of monitoring. This tracking must include documentation verifying completion of the training, who performed the training and the length of time that the training lasted.
- **Non-technical training for CEUs is limited to four (4) hours.**

- The requirement for CEUs begins at the time that an Indiana Competency is obtained. The following scale represents a reduced CEU requirement based upon when the first or initial competency is obtained:
 - Competency obtained on or after July 1: 12 CEUs required
 - Competency obtained on or after October 1: 8 CEUs required
 - Competency obtained on or after January 1: 4 CEUs required
- For the QCI certification, BPI requires that individuals holding this certification obtain 24 CEUs over the three year duration of the certification. Provided that the QCI obtains the 24 CEUs, they will only be required to pass the skills portion of the QCI testing to recertify.

The following is a list of examples of training that apply toward the 16 hours of Indiana continuing education:

- National DOE Conference
- Affordable Comfort Conference
- Annual Competency Maintenance Training – (Pre-set at 4 CEUs)
- Semi-Annual Technical Training (SATT) – (Pre-set at 4 CEUs)
- Semi-Annual Managers Meeting(SAMM)
 - For those involved in Program Management
- Indiana Healthy Homes Conference (Lead Base Paint, Mold, etc.)
- Lead Based Paint **refresher courses** including Risk Assessor, Inspector, Supervisor and Renovator
- INCAA General Weatherization Training
 - INCAA courses are rated hour for hour regarding CEUs. For example, a class that lasts for six hours will result in accumulating six hours of CEUs.
 - Examples include DSTO Class, CAZ Classes, High Performance Insulation, etc.
- On-Site Technical and Training Assistance Trainings performed by INCAA
 - Sign-in sheet is required for CEUs to count
 - Sign-in sheet must record how long the training lasted
 - CEUs will accumulate hour for hour as described above. If the training lasts six hours then six CEUs are accumulated.

The following is a list of examples of training that DO NOT apply toward CEUs:

- The required training to obtain a particular competency DOES NOT count toward CEUs. For example – someone is taking the five-day Energy Auditor training to obtain their Energy Auditor Competency. This five day class DOES NOT count as CEU's – it is required to obtain the competency (For instance, if the above person takes a CAZ class to supplement the Energy Auditing training, the CAZ class DOES count toward their CEUs).
- Classes outside of INCAA that do not pertain to Weatherization skills and topics
- Classes that are taken for which the Subgrantee has no documentation of class completion or attendance

- Classes that are not related to the competency or certification that the individual(s) obtain

Please note that these are not exhaustive lists. Questions regarding whether or not a particular training would/should apply toward the 16 hours of continuing education should be directed to IHCDa prior to attending the training.

Questions regarding industry specific training being allowed to count toward the 16 hours of training should be directed to IHCDa.

IHCDa STRONGLY recommends that the required CEUs be obtained through training offered through the accredited Weatherization courses offered at INCAA.

Each IHCDa Subgrantee is responsible for accurately tracking all staff and/or contractor competencies and certifications.

This tracking must include the following information:

- Individual name and competency(s) and/or BPI certifications held
- Date competencies and/or BPI certifications expire
- Hire date
- Attendance at Annual Competency Maintenance Training
- Current BPI/INCAA Certifications where applicable
- Record of training for 16 hours of CEUs

IHCDa will verify training records and qualifications of all Subgrantee staff, crew members and contractors annually near the end of March. Subgrantees must be prepared to provide training documentation whenever it is requested by IHCDa. Training records must contain clear documentation and verification that the required and appropriate training was attended and completed. Examples of this documentation include copies of training certificates, sign-in sheets (conferences for example), and BPI student portal information. IHCDa may, at their discretion, monitor the tracking and completion of the required training at times other than listed in the bullet point above.

605 ADDITIONAL COMPETENCY/TRAINING REQUIREMENTS

IHCDa staff and contracted monitors responsible for evaluation of Subgrantee administrative performance are required to complete at least eight (8) hours of administrative training per year.

IHCDa staff and contracted monitors responsible for evaluation of Subgrantee technical performance are required to complete at least ten (10) hours of technical training per year.

IHCDa staff and contracted monitors responsible for evaluation of Subgrantee technical performance are required to be either Indiana Weatherization Competent as an Energy Auditor or BPI certified as an Energy Auditor and be certified as a BPI Quality Control Inspector.

Weatherization Program Managers responsible for the administration of the Weatherization Assistance Program at the Subgrantee level are required to attend all Semi-Annual Managers Meetings (SAMM) as well as any other required administrative offerings provided by IHCD. If a Weatherization Program Manager is not able to attend any required training, an appropriate representative from the Subgrantee must attend in their place. SAMM's will be held no more often than twice per year and other administrative courses will be held as deemed necessary by IHCD. When possible, IHCD will attempt to host trainings via webinar, video conferencing, distance learning, or conference calls.

Each Subgrantee is required to send at least one technical representative for their field staff/contractors to all Semi-Annual Technical Trainings (SATT). All field staff and contractors are encouraged to attend when not otherwise restricted by IHCD. SATT's will be held no more often than twice per year unless additional training is deemed necessary by IHCD.

All staff or contractors subject to the competency training outlined earlier in this chapter are required to attend Lead Safe Work Practices and Mold & Moisture Assessment within the first nine months of employment.

Verification of LSWP/Moisture certification is not required after four (4) years of continuous employment in the Indiana WAP as an ISV mechanical, crew leader, shell, audit or QCI.

Following WPN 17-7, Grantee Monitors and Inspectors must be Certified Lead Renovators.

606 ADDITIONAL TRAINING OPPORTUNITIES

IHCD will continue to offer, through INCAA, additional courses which will address specialized training needs in one to five-day class formats. Course subjects, course descriptions, length of classes, prerequisites, and course schedules are located on INCAA's web site at incap.org under the Weatherization Training link.

Classes are filled on a first come-first served basis. Once a class is filled, Subgrantees are encouraged to place those needing training on the waiting list so that existing classes can remain full if there are cancellations and future classes can be scheduled to meet the demand. To be placed on the waiting list individuals must register for the class.

607 LEAD BASED PAINT

Every Subgrantee is required to be in compliance with the Environmental Protection Agency's (EPA) Lead Renovation, Repair, and Painting Rule (RRP). All contractors performing work where de minimis levels of assumed and/or confirmed lead based paint will be disturbed must be an EPA Firm and comply with the EPA RRP Rule. Details regarding compliance and requirements can be found at the EPA's RRP site <http://www.epa.gov/lead/pubs/renovation.htm>

All HUD properties receiving Weatherization services must follow HUD lead based paint rules.

IHCDA Minor Paint Disturbance Policy:

- All homes built prior to 1978, where paint will be disturbed, and the paint is either verified or assumed to be lead based paint, the following lead safe work practices, at a minimum, shall be used:
 - Lay 6 mil plastic 10' beyond the area where paint is disturbed – exterior
 - Lay 6 mil plastic 6' beyond the area where paint is disturbed – interior
 - Wet the area of paint being disturbed
 - Wet all paint chips prior to clean up and removal
 - Limit access to the area where paint is being disturbed
 - Ensure that all proper personal protective equipment is used
 - Ensure proper disposal of trash and material
 - Provide pictures for the client file showing use of lead safe work practices
 - Use the XRF to limit the need for lead safe work practices
- IHCDA requires that each Subgrantee maintain the following:
 - Obtain and maintain Lead Firm Status through the EPA
 - Have at least one Weatherization staff member who has achieved Renovator certification
 - Have at least one Weatherization staff member who is a licensed Lead Inspector and capable of performing lead tests with the Niton XRF Analyzer, or similar XRF analyzer.

608 OSHA TRAINING

OSHA 10 hour training is required for all Weatherization workers including auditors, final inspectors, shell workers, mechanical workers, crew supervisors, and HVAC employees who work in the home. For newly hired employees, this training must be completed within the first nine months of employment commencing 45 days from hire date.

609 BACKGROUND CHECKS

In order to protect the safety of clients receiving weatherization services, Subgrantees must perform a criminal background check and employment verification prior to the employment of Subgrantee/contractor employees planning to work with clients or in the home of client's being rehabilitated or weatherized as a part of Indiana's Weatherization Assistance Program.

The criminal background report must contain a criminal background check which includes the following:

- State and county records from all 50 states including data from courts, sexual offender registries and department of correction records

- An Indiana criminal history check which contains records of criminal convictions or currently pending criminal charges in counties throughout the State of Indiana
- A Social Security Number (SSN) Trace which provides names and addresses associated with a social security number along with the date and state of its issuance (this is a tool to aid in verifying the identity and location of a particular applicant)
- Confirmation of employment dates and job titles held with previous employers, the reason for leaving, and eligibility for rehire, if available.
- Subgrantees must use careful consideration when analyzing the results of the reports and prohibit employment of anyone convicted of violent offenses (including but not limited to aggravated battery, physical assault, use of weapons, home invasion, rape, murder, burglary, robbery) or appearing in any sex offender registry.
- Subgrantee Weatherization Program Managers are encouraged to work with their Human Resources and Executive Staff personnel to develop acceptable hiring practices based upon background check results.
- It is the Subgrantee's responsibility to ensure that this background check is performed and properly tracked for all Subgrantee weatherization staff and contractor employees.

610 COMPLIANCE ISSUES

IHCDA will evaluate compliance with competency and other required training annually. Subgrantees must be prepared to provide IHCDA with training documentation whenever it is requested by IHCDA.

If a Subgrantee fails to meet the Indiana Competency Training or DOE Quality Control Inspector (QCI) requirements or is found to have an individual or individuals working or worked on a weatherization home without the above mentioned requirements. IHCDA may take, but not be limited to, the following steps:

- Issue a written finding with a timeline for resolution of the non-compliance issues
- Require re-works or re-inspections at the Subgrantee/contractor expense
- Require repayment of all funds claimed for the affected Weatherization work
- Hold the Subgrantees weatherization financial claims until all issues are properly addressed

Temporarily suspend the affected workers from performing work in Indiana's Weatherization Assistance Program. IHCDA will review Subgrantee compliance through Subgrantee files (tracking) and INCAA training records. It is the responsibility of the Subgrantee to identify within the client file each individual(s) who completed the initial audit, shell and mechanical work (including everyone performing work), pressure diagnostics of the home, who evaluated the combustion appliances and performed the interim inspection (when necessary) and the Quality Control Inspection (QCI).

611 DOE NATIONAL CERTIFICATIONS

Every weatherized home in Indiana must be final inspected by a BPI certified Quality Control Inspector (QCI) to count as a completion.

The QCI Certification will be effective for three (3) years. The Building Performance Institute (BPI) is the certifying body for the QCI Certification. BPI requires that each QCI Certified individual obtain 24 CEUs over the three (3) year duration of the certification. IHCD will allow the CEUs obtained for this certification to count toward the 16 CEUs outlined in Section 604.1 above. QCI certified individuals are encouraged to reference BPI's web site regarding acceptable CEUs for the QCI certification.

IHCD will continue testing for DOE's National Energy Auditor Certification and Quality Control Inspector during the DOE funding cycle of April 1, 2018 – March 31, 2019.

612 ROLES AND RESPONSIBILITIES

What is an Energy Auditor?

An energy auditor is a residential energy-efficiency professional who **evaluates** the energy efficiency and health & safety of a home and conducts field measurements and diagnostic testing to identify areas for energy savings and enhancements. The energy auditor **produces a work order** based upon the information gathered to direct the energy efficient work and installed measures for homes to be weatherized.

What is a Quality Control Inspector (QCI)?

A quality control inspection is a residential energy-efficiency professional who **ensures** the completion, appropriateness and quality of energy efficiency upgrade work and installed measures. This will be accomplished by the following:

- Conducting a methodological audit/inspection of a building and the completed work
- Performing safety and diagnostic tests
- Observing the work
- **Reviewing/assessing** the effectiveness and completeness of the energy audit

IHCD Expectations and Best Practices for Indiana's Weatherization Network

Effective April 1, 2018, IHCD will allow two options for meeting the Quality Control Inspection requirement. Subgrantees must apply to IHCD in order to be able to utilize the Energy Auditor as the QCI option and must indicate their intended method to IHCD for

consideration. Subgrantees that do not submit a plan to IHCDCA will be required to utilize an Independent QCI.

Independent QCI

Per WPN 15-4, the Independent QCI is an individual that has no involvement in the prior work on the home either as the auditor or as a member of the crew. The Grantee or a DOE-approved representative (for example, a certified QCI employed by a third-party) must perform quality assurance review of at least 5 percent of all completed units.

- Separation of duties between the Energy Auditor and QCI must be clearly defined – and not crossed.
- Weatherization Program Managers are NOT a good fit to be a QCI for the program they manage.
- The QCI must take every precaution necessary to not become involved in the decision making process regarding the work being performed at the home.
- All additional work or needed re-work should be brought to the attention of the WX Program Manager or Energy Auditor and not handled directly by the QCI.
- Crew Leaders should seek guidance on performing work from the WX Program Manager or Energy Auditor.

Energy Auditor / QCI

A. The auditor performs the audit, creates the work order, and performs the final quality control inspection. The auditor is not involved in any of the actual work on the home. Because this model does not allow for an independent review of the audit on every home, IHCDCA is required to increase the percentage of quality assurance reviews to ensure that audits are being performed consistently and correctly. IHCDCA will monitor a minimum of 10% of DOE completions.

B. Inspectors shall not participate in professional activities involving a conflict of interest. A conflict of interest occurs when an inspector is inappropriately motivated by any financial, personal, or professional incentive other than the production of a professional report that clearly, completely, and usefully reflects the conditions observed during the audit. Inspectors shall avoid, whenever possible, even the appearance of a conflict of interest and shall disclose all potentially questionable associations and relationships in advance to IHCDCA with a legitimate right to be informed of them.

C. Inspectors shall not inspect work performed by organizations under arrangements whereby any compensation or future referrals to the inspector depend on or are influenced

by the findings of the report. Compensation includes direct and indirect remuneration as well as substantial gifts and favors. Inspectors shall not accept any form of compensation for recommending products or services to clients or other parties having an interest in the inspected work.

D. Additional documentation may be required by IHCDCA if necessary, including:

- Documentation of the independent status of the Quality Control Inspector
- Documentation outlining any involvement of the QCI in the audit process

E. Quality control inspections are subject to IHCDCA assessment of effectiveness and compliance with program inspection policies and monitoring will include documentation of any findings related to the quality of the inspection and impartiality of the inspection process.

F. IHCDCA will maintain tracking of all subgrantee QCI activities to include all aspects of the subgrantee developed QCI process, subsequent corrective actions, and final outcomes.

G. If QCIs are found to be out of compliance, remedial training may be required for the QCI, the installation contractor, and/or Subgrantee staff. Limited remedial training may be provided by IHCDCA staff onsite at the time of the monitoring, or more extensively through the training facility at INCAA if necessary. Alternatively, IHCDCA staff may provide more comprehensive training at a later date. Repeated noncompliance issues after remedial training may result in the agency being placed on QIP, or a reduction in funding. All compliance issues found with QCIs are subject to IHCDCA review, and may result in the QCI not allowed to perform inspections for Indiana WAP.

J. Subgrantees may not be considered if one or more of the following program deficiencies are identified:

- General Administrative Deficiencies that include late interim or closeout reports, late completion reporting (data entry), lack of procurement policies,
- outdated cost allocation plans
- Fiscal Reporting issues that include failure to claim expenses on a monthly basis, repeated occurrences where expenses are submitted more than 45 days
- after the invoice or purchase order date, contractors paid beyond the 45 day requirement
- Staff or contractors fail to receive proper certifications
- Average cost per home exceeds cost guidelines set forth by DOE or HHS (LIHEAP) funding
- At least 25 percent of client files reviewed are deemed ineligible
- High risk outcome on the Risk Assessment

Subgrantees are required to ensure that each weatherization completion receives an appropriate and properly executed final inspection. This inspection must be performed by a

BPI certified Quality Control Inspector (QCI). IHCD, as part of their regular monitoring procedures, will review final inspection forms, Subgrantee inspection processes and completed homes to ensure the inspections are being performed correctly and in a manner that meets DOE expectations as outlined in WPN 15-4.

Failure by the Subgrantee to utilize the QCI process correctly may result in the associated completion(s) being considered unallowable, and all associated cost being returned to IHCD. Should multiple instances of poorly performed inspections be found, IHCD will, at the very minimum, place the Subgrantee on a Quality Improvement Plan (QIP). Should the QIP fail to correct the issues, IHCD will pursue further remedies for noncompliance as allowed in their Weatherization Policy and Procedures Manual, and the Subgrantee grant agreement (contract).

613 TRAINING STIPEND

Subgrantees will be allotted a \$1,000 base award with an additional \$500 for every county serviced by the Subgrantee per grant cycle for the purpose of providing Training and Technical Assistance for subgrantee staff and contractors interested in performing weatherization work for the Subgrantee. These funds may be used to cover only those expenses related to weatherization training, including:

- Class Fees
- Material Fees
- Written / Field Testing
- CEU Events
- Salary / Wage / Time reimbursement
- Travel Expenses (excluding meals)
- Lodging

Contractors must demonstrate their commitment to providing weatherization services for the Subgrantee by having an active contract with the Subgrantee before being considered for the stipend. Requests for stipends to reimburse contractors without an active contract must be reviewed by IHCD.

Subgrantees that use a stipend for contractors and staff must provide training documentation to IHCD upon submitting claims for the stipend. Training records must contain clear documentation and verification that the required and appropriate training was attended and completed. Examples of this documentation include copies of training certificates, sign-in sheets, and BPI student portal information.

Examples of allowable courses are listed on INCAA’s website, as well as those outlined in Sections 602 and 604. Subgrantees must have approval from IHCD for classes not listed prior to attending if the stipend will be used. Other associated costs related to training not listed above must first be approved by IHCD. Requests for additional funds will be submitted to IHCD for review.