



**Department of Energy**  
Washington, DC 20585

**WEATHERIZATION PROGRAM NOTICE 12-09**  
**EFFECTIVE DATE: JUNE 27, 2012**

**SUBJECT: WEATHERIZATION ASSISTANCE PROGRAM INCIDENTAL  
REPAIR MEASURE GUIDANCE**

**PURPOSE:** To provide guidance on incidental repair measures (IRM) allowable under the Department of Energy (DOE) Weatherization Assistance Program (WAP).

**SCOPE:** The provisions of this guidance relate to financial assistance Grantees and Subgrantees under the DOE WAP.

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

**BACKGROUND:** Recent DOE Project Officer monitoring, DOE Inspector General reports, third party quality assurance reviews, and comments collected from Grantees indicate a widespread inconsistency in interpretation of DOE policy concerning Incidental Repair Measures. The WAP federal regulations 10 CFR §440.3 defines *Incidental Repairs* as follows: “those repairs necessary for the effective performance or preservation of weatherization materials. Such repairs include but are not limited to, framing or repairing windows and doors which could not otherwise be caulked or weatherstripped and providing protective materials, such as paint, used to seal materials installed under this program.” Grantees and Subgrantees are reminded that the WAP is not a rehabilitation or general repairs program. Program policies strictly prohibit roof replacements, structural repairs, or other non-energy related rehabilitation work. Units requiring this type of repair should be referred to a rehabilitation program or the Subgrantee must use other sources of funds to cover these costs. **Incidental repairs must be justified in the client file with an explanation for their need and relationship to a specific energy conservation measure (ECM) or group of ECMs.**

The introduction of advanced energy audits in 1993 altered the concept of tracking just materials costs to installed measures costs (materials, including warehouse and delivery, as well as labor and on site supervision costs). Instead of separate limits on dollars spent for weatherization and/or incidental repair materials to control spending, the cost of ECM and incidental repair measures (IRM) was limited by requiring a Savings-to Investment Ratio (SIR) of 1.0 or greater, and a maximum average expenditure for each home weatherized. Although IRM continue to have a requirement to be justified by an *association* (necessary for effective performance or preservation) with one or more ECM, the WAP enabling statute indicates the *costs* for IRMs must be limited by inclusion in the “cost of the package of measures installed in a dwelling 10 CFR § 440.21(d).” This Program Notice will assist Grantees in appropriately including ECM ancillary item costs and IRM costs as part of a package of measures.

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

**Ancillary Items** – Items necessary for the proper installation of weatherization materials. Ancillary item refers to small items such as hardware, nails/screws, other fasteners, adhesive, sealant, etc, and not large-ticket items such as dry walling, roof/floor-decking, rough framing, etc. (the latter are incidental repairs). Ancillary items are items required by materials manufacturers, general construction, and/or WAP field standards to achieve a finished product in a typical installation where no unusual or extensive repairs are needed. The costs of ancillary items and installation are to be included within the cost of an individual ECM when calculating the SIR for the individual ECM. Although the WAP requires the use of appropriate, durable ancillary materials, standards for ancillary items are typically not listed in 10 CFR Part 440, Appendix A.

**Energy Conservation Measure (ECM)** – A procedure, including materials and installation, which is considered or performed for its anticipated energy savings. An ECM often includes installation of ancillary items but will not include IRMs. The installed cost of all ancillary items associated with the proper installation of an individual ECM must be added to the cost of its ECM when calculating the SIR for the individual ECM.

**Health and Safety Measure** – Health and safety measures are those actions necessary to maintain the physical well being of both the occupants and/or weatherization workers where the actions **MUST** be taken to effectively perform weatherization work *or* the actions are necessary as a result of weatherization work. Grantees are required to identify health and safety procedures and an estimate with rationale for the percentage of costs involved as a part of their overall Health and Safety Plan to be approved by DOE.

**Incidental Repair Measure (IRM)** –Includes incidental repair materials and installation, which are performed because they are deemed necessary for the effectiveness of one or more ECMs. The ECM(s) that require the installation of an IRM must be documented in the client file. The IRM costs are not added to an individual or partial group of ECM costs. The total cost of all IRMs is added to the cost of the package of weatherization measures to calculate the whole unit (SIR).

**Package of Weatherization Measures** – The cost of all ECMs included in an audit or priority list and/or installed in a home. The estimated cost of each ECM will include the estimated cost of its ancillary items. The cost of all IRMs is added to the cost of the package of weatherization measures when calculating the SIR for the whole building.

**Weatherization Materials** – Materials that are purchased for installation in a building that are anticipated to have a direct impact on saving energy. A definition of approved weatherization materials can be found in Federal Regulations 10 CFR §440.3.

Weatherization materials must be listed and must comply with the standards in 10 CFR Part 440, Appendix A.

**Examples:**

<b>Energy Conservation Measure (ECM)</b>	<b>Ancillary Items</b> (Cost must be included in SIR for associated individual ECM)	<b>Incidental Repair Measure (IRM)</b> (Cost must be included in SIR for whole unit package of ECM)	<b>Health and Safety Measure</b> (Separate cost justification. Not included in SIR)
Attic insulation	Eave baffles, hatch dam, dams for heat producing devices	Attic vents. Minor roof repair to preserve insulation. (if identified as IRM in Grantee Plan)	Minor repair of leaking roof that may create moisture/mold issue in attic insulation. (if identified as H/S measure in Grantee Plan)
Wall insulation	Sealing high and low openings in balloon framing	Sealing unusual openings as in void areas between double ceilings. Minor roof repair to preserve insulation. (if identified as IRM in Grantee Plan)	Minor repair of leaking roof that may create moisture/mold issue in new wall insulation. (if identified as H/S measure in Grantee Plan)
Air sealing	Fasteners for patches	Unusually large (defined by Grantee), such as more than 1 sheet of sheetrock, patching materials and labor	
Attic hatch – (a required part of the larger air sealing	Items to complete proper construction such	Demolition and/or framing for a new hatch, new ceiling	

ECM, sealing the access opening with a rigid lid and weatherstripping)	as: hold down clasps, handles, caulk for ceiling-to hatch frame seal, insulation	trim and stop	
Crawl space or knee wall access door (a required part of the larger air sealing ECM, sealing the access opening with a rigid door and weatherstripping)	Hinges, latches, insulation	Demolition of deteriorated existing frame, new framing, new trim and stop	
Caulking, weatherstripping existing windows (done as a part of the larger air sealing ECM)	Backer rod, cleaning off old caulk	Primer or sealer, replacing deteriorated framing, other prep repair	
Vinyl replacement windows for double hung sashes	Fasteners, interior and exterior caulk materials & labor	Replace broken stops, replace or repair rotted jambs and wall framing	
Replacement or repair of heating/cooling systems	All typical accessories for proper installation	Flue repair, providing combustion air from outside the CAZ as needed	All, including flue repair and combustion air from outside CAZ as needed, if the system is inoperable, per Grantee H&S plan
Heating/cooling system replacement	Include all associated costs within replacement cost	Construction of separate CAZ per code requirement	Include all associated costs if SIR disqualifies as ECM, per Grantee H&S plan
CFL		Replace hazardous light socket or fixture. (if identified as IRM in Grantee Plan)	Replace hazardous light socket or fixture. (if identified as H/S measure in Grantee Plan)

The IRM category is intended for a measure that is not typically part of the installation of an ECM, is outside the manufacturers or industry standard for installation.

**GUIDANCE:** The primary goal of the WAP is to lower the home energy costs of qualified households without negatively affecting the health and safety of the occupants. Justification for the cost of each IRM and how each IRM is necessary for the effective performance or preservation of an ECM must be documented in the client file. Further, each ECM, including any associated ancillary items and installation costs, must have a calculated SIR of 1.0 or greater to be eligible for DOE funding. For each weatherized building, the cost of the total package of ECMs, added to the cost of all IRMs for the building, must have a calculated SIR of 1.0 or greater.

After the first audit run, a package of measures may not have a qualifying SIR. It would be necessary to remove the combination of the ECM and its related IRM with the lowest SIR. If the IRM was deemed necessary for effective performance of the ECM, then both the ECM and the IRM must be removed in the attempt to meet the dwelling SIR. This process (removing the lowest ECM and its associated IRM) would continue until the package of measures (and each ECM) has a qualifying SIR.

If one IRM is necessary to protect or enhance more than one ECM, (e.g. roof repair protecting attic insulation, sidewall insulation, and foundation insulation; and the Grantee plan designates roof repair as an incidental repair) then all of those ECMs together must be considered for removal until the SIR for the package of measures is 1.0 or greater. This process may result in deferral of the weatherization work until another funding source can be found to pay for the IRM(s).

IRMs must be limited to those *minor repairs* necessary for effective performance or preservation of measures installed by the Subgrantee. WAP funds cannot be used to install IRMs deemed necessary to protect materials in the building before the WAP audit is performed.

A cost limit for per unit IRMs must be included in the cost of the audits submitted for approval of a priority list. If a subsequent audit determines more extensive IRMs are needed in a building, a full computerized energy audit must be run on the building to justify additional IRM cost.

**Grantees that use priority lists must set cost limitations in their annual plan for IRM or perform a site specific audit to justify the cost of the incidental repairs.**

**Any Grantee policy or procedure dealing with IRM that does not comply with this program notice, must be reviewed and revised as necessary to reflect the changes in this guidance. If IRM costs are not limited, all previously approved priority lists must be amended. Effective immediately, all Grantees should begin the process of implementing this guidance with their Project Officer with all necessary actions completed prior to the beginning of Program Year 2013, when full compliance will be required.**

**CONCLUSION:** Frequently Ask Questions are attached and will be posted on the EERE website [http://www1.eere.energy.gov/eere\\_faq/default.aspx?pid=10&spid=2](http://www1.eere.energy.gov/eere_faq/default.aspx?pid=10&spid=2) with additional questions as they are answered. If you have additional questions, please contact the Project Officer assigned to your grant.



For AMG

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

Attachment