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## ELIGIBILITY AND DOCUMENTATION

This Chapter provides guidance on establishing eligibility and documentation requirements for participants in the New Jersey Weatherization Assistance Program (NJWAP). Dwelling units may be determined to be eligible for weatherization assistance based on either the amount of household income (income eligibility) or the source of household income (categorical eligibility).

### 1. Income Eligibility

#### 1.1 Income Guidelines:

Eligibility guidelines are based on the Federal Poverty Guidelines. Per The U.S. Department of Energy (DOE) regulations, the State of New Jersey computes income eligibility at gross annual household income equal to or less than 200% of Federal Poverty Guidelines. ([See Weatherization Program Notice \(WPN\) 18-3](#))

Family Size	Gross Annual Income(\$)
1	\$24,280
2	\$32,920
3	\$41,560
4	\$50,200
5	\$58,840
6	\$67,480
7	\$76,120
8	\$84,760
Each Additional Member	\$8,640

“Household” is defined as “all persons living together in a dwelling unit” (10 C.F.R. § 440.3). Proof necessary to include a person as a member of the household is described in more detail in Section 3 (“Required Documentation”).

#### 1.2 Definition of Income:

“Income” refers to total annual cash receipts, earned and/or received, before taxes from all sources, commonly referred to as gross income, with the exceptions noted in Section 1.2.2 “Income Exclusions”). Income data for a part of a year may be annualized in order to determine eligibility—for example, by multiplying by four the amount of income received during the most recent three months.

Income includes any or all of the following:

- money (gross) wages and salaries before deductions;
- adjusted gross income as indicated on line 37, IRS 1040.
- net receipts from non-farm or farm self-employment (receipts from a person's own business or from an owned or rented farm, after deductions from business or farm expenses);
- regular payments from social security, railroad retirement, unemployment compensation, strike benefits from union funds, worker's compensation, veteran's payments, training stipends, alimony, and military family allotments;
- private pensions, government employee pensions (including military retirement pay), and regular insurance or annuity payments;
- dividends, interest earned from assets, net rental income (See Section 1.2.1), net royalties, periodic receipts from estates or trusts;
- net gambling or lottery winnings.

### **1.2.1 Net Rental Income**

Net rental income is the difference between gross rental receipts and building operating expenses.

Building operating expenses include: mortgage interest, property taxes, utilities (paid by the landlord/applicant), insurance premiums, and maintenance expenses. For those landlord/applicants who reside in a unit within the building which provides the rental income, the building operating expenses must be prorated before being deducted from the gross rental receipts. For example, if the landlord/applicant resides in one unit of a four-unit building, then only  $\frac{3}{4}$  of the building's operating expenses can be deducted from the gross rental receipts when calculating net rental income.

**The Net Rental Income calculation worksheet can be found in the Appendix.**

### **1.2.2 Income Exclusions:**

Income calculated for the purpose of determining program eligibility excludes the following:

- capital gains;
- any assets drawn down as withdrawals from a bank, the sale of property, a house, a reverse mortgage, or a car;
- one-time payments from a welfare agency to a family or person who is in temporary financial difficulty;
- tax refunds, gifts, loans, lump-sum inheritances, college scholarships, one-time insurance payments, or compensation for injury (compensation for lost wages related to an injury are included in income);
- noncash benefits, such as the employer-paid or union-paid portion of health insurance or other employee fringe benefits, food or housing received in lieu of wages, the value of food and fuel produced and consumed on farms, the imputed

value of rent from owner occupied non-farm or farm housing, depreciation for farm or business assets.

- Federal noncash benefit programs such as Medicare, Medicaid, Food Stamps, school lunches, and housing assistance.
- Child support payments whether received by the Payee or paid by the Payor. Where an applicant pays child support, he or she may not deduct said assistance for the purpose of determining eligibility.
- Combat zone pay to the military.
- Payment for care of foster children.
- Reverse mortgages.
- Adoption Subsidies

### **1.3 Calculation of Social Security Income**

If a household member receives Social Security benefits and/or SSI, the countable income must be determined as follows:

- i. For individuals receiving Social Security benefits the net amount of the monthly check is countable. If the household presents an award letter rather than a check as evidence of income, the WAP Agency must determine if the individual pays a Medicare Part B premium and deduct that amount from the gross amount of the benefit. The resulting balance shall be considered as income to the household.
- ii. For individuals receiving SSI, the WAP Agency shall deduct the supplemental payment amount from the Tenants Lifeline Credit Program which is included in the SSI check. The balance shall be considered as income to the household.

### **1.4 Zero Income**

Households that apply for Weatherization Assistance are required to submit income documentation. If a household applies for weatherization and states that there is no income, the agency must review all the information submitted with the application to make a reasonable assumption regarding the accuracy of the statement. For example, if the household has paid current rent, utility bills, and property taxes, it is reasonable to assume that the household has income.

WAP Agencies cannot accept an affidavit of zero income without requiring a household to document that they have no income. A household must provide a notarized Affidavit of No Income . A household can certify that they have no income by obtaining an income printout from the unemployment office. If the household is living on savings, interest from those savings is considered income and must be reported to the IRS. The household must submit a copy of the most recent income tax return or a tax return transcript (for more information on this see Section 3.4 “Income Verification”) showing the reported interest and signature of filer. If the household is

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unwilling to cooperate in establishing eligibility for the NJWAP they cannot be served. WAP Agency must submit all zero income for review to the Department.

All zero income clients must be sent to the department income verification. Please email name, address, and social security number for all zero income clients to [income-verification@dca.nj.gov](mailto:income-verification@dca.nj.gov). E-mails should be sent with a “read receipt” request to verify receipt by the Department. The Department shall respond via e-mail with verification of income for each household member. A copy of this e-mail shall be printed and placed in the applicant household file.

**The Affidavit of No Income can be found in the Appendix. This affidavit must be notarized.**

### **1.5 Income Recertification Policy:**

Households that have been certified eligible for weatherization and are placed on the sub-grantee waiting list remain eligible for a period of one year from the certification date. The certification date shall be the actual date the household was determined eligible, not the revised date based on the point system described in Section 4 (“Prioritization of Applicants”). If a client is on the waiting list for one year or more, the WAP Agency must request updated income documentation as outlined in Section 3

(“Required Documentation”), before the household can be served. Clients should not be recertified until the unit is reachable on the waiting list to avoid more than one recertification request per household.

All applicants determined to be eligible for Weatherization Assistance will remain eligible for a period of one year from the date they are certified by the agency as eligible. If an energy audit of the applicant’s dwelling unit is performed by the WAP Agency within one year from the date the applicant is certified, no additional documentation is required. If an application has not been acted upon during the past year, it must be reviewed, dated and re-signed certifying that all information provided is still current. This does not change the requirement for income verification as set forth herein.

## **2. Categorical Eligibility**

Categorical eligibility means that households are determined to be eligible despite a total household income which may exceed the income guidelines. Categorical eligibility exists when any member of the household receives cash assistance payments from any of the following programs:

1. Temporary Assistance to Needy Families (TANF)
2. Food Stamps
3. Adoption Subsidy

A complete application is required for all categorically eligible households. Income verification documentation required in Section 3.4 of this chapter is not required for households that are determined to be categorically eligible. However, income documentation must be collected by the agency for the purpose of collecting required demographic information, such as total household income.

### **2.1 Supplemental Security Income (SSI):**

“SSI” refers to payments issued by authority of Title XVI of the Social Security Act for retirement or disability purposes. The Social Security system provides disability and retirement benefits based on two criteria: economic contribution and economic need. When individuals apply for Social Security benefits, an analysis of their contributions into the system determines their benefit level. If this benefit level is sufficiently low, a second analysis of their entire economic situation is conducted (including consideration of all income sources, personal assets, net worth, etc.) and a second benefit, SSI, is also issued. SSI benefits may also be issued to an individual who never worked for wages and therefore receives no regular Social Security benefits. Recipients of SSI payments are categorically eligible, though recipients of regular social security payments are not automatically categorically eligible.

## **3. Required Documentation**

### **3.1 Application:**

All applicants shall be required to complete an application for weatherization assistance. This includes all clients that come to the WAP Agency from the Home Energy Assistance Program (HEA) as the result of a direct feed to HEA from the Food Stamps or the Pharmaceutical Assistance to the Aged and Disabled (PAAD) programs. This application may be the same application used for the household to apply for HEA benefits, provided that the application is complete and current.

### **3.2 Employment Information:**

The ‘applicant employment information’ screen in the HESWAP database system must be completed for all employed members of the applicant household. Under no circumstances shall a WAP Agency certify a household as eligible where this information is omitted or incomplete.

### **3.3 Social Security Number:**

All applicants, including those that come to the WAP Agency from the HEA as the result of a direct feed from the Food Stamps or the PAAD programs, will be required to submit social security numbers (SSNs) for the applicant and documentation of social security numbers for all household members. A copy of the documentation must be retained in the client file.

Acceptable documentation of a social security number includes:

- an original SSN card issued by the Social Security Administration (SSA)
- an original SSA issued document which contains the name and SSN of the client, or
- An original document issued by a federal, state, or local government agency, which contains the name and SSN of the individual.
- Medicare card (with SSN on it)

If a member of the household does not have a SSN, the household member or guardian (if household member is a minor) must sign a [Certification of No Social Security Number](#). The original signed certification must be retained in the client file at the WAP Agency.

If a member of the applicant household has an Individual Taxpayer Identification Number (ITIN) issued by the IRS. Documentation of the household member's ITIN must be included in the client file as well as a completed and executed Certification of No Social Security Number.

If an applicant does not have a SSN or an ITIN, s/he shall provide one of the following: Green card, birth certificate, driver's license, or I-688 work approval. A copy of such documentation must be included in client file.

**The Certification of No Social Security Number can be found in the Appendix.**

### **3.4 Income Verification:**

WAP Agencies shall obtain proof of income eligibility from all applicants. WAP Agencies are required to maintain such proof in the client files.

- The original documentation verifying income may include:
- Paystubs
- W-2 forms
- Tax returns
- Financial statements
- Compensation award letters
- Other documentation verifying income

The WAP Agency must also verify information related to the applicant's self-employment.

The original documentation verifying income for self-employed applicants may include:

- Tax returns
- Financial statements

The Department shall maintain the right to request or obtain third-party verification of income for any applicant. Moreover, the WAP Agency may, at its discretion, request a copy of an applicant's most recent Federal Income Tax Return, including all schedules if there is any question as to the eligibility of the applicant based on other forms of documentation concerning income eligibility. If an applicant does not have a copy of his/her Federal Income Tax Return, or if there are irregularities on the Federal Income Tax Return submitted, the WAP Agency shall require the submission of a Tax Return Transcript for the current year. (Irregularities include but are not limited to missing pages, evidence of alterations, and other evidence that the Federal Income Tax Return submitted is not an exact duplicate of what was filed with the Internal Revenue Service.) Tax return transcripts do not reflect changes made after the return was filed. To order a tax return transcript free of charge, applicant may use IRS Form 4506T or call 1-800-829-1040. If the applicant does not file Federal Income Tax Returns, s/he must sign the [Certification of No Federal Income Tax Return Filed](#). In lieu of IRS 4506, any government income verification form is acceptable.

(2) Copies of all applicable documentation in Section 3.4.1. ("Earned Income Documentation") and 3.4.2. ("Other Income Documentation") must be in the client file. Pursuant to WPN 10-18 eligibility documentation from LIHEAP shall be sufficient proof of eligibility for WAP, and kept in the client file.

Any applicant household member over the age of 18 with zero income, or rental income, shall be reviewed by the Department prior to the applicant being determined to be income eligible for assistance. Members of the household over the age of 18 with zero income, with proof that they are enrolled as full-time students do not require prior approval of the Department. Files for applicant households with zero income or rental income shall contain a copy of the e-mail from the Department which verifies that the household is eligible.

Any applicant household member over the age of 18 who does not file a Federal Income Tax Return shall seek verification from the IRS that no tax return was filed by filing IRS Form 4506T or call 1-800-829-1040 with the IRS. Files for applicants that do not file Federal Income Tax Returns shall contain verification from the IRS that no Federal Income Tax Return was filed.

Prior to June 30 of any given year, the prior year's Federal Income Tax Return may be considered the more reliable verification of income, and subsequent to June 30 of any year, other income verification that contains year to date payment information may be considered more reliable. Where the various sources of income verification are not consistent, (i.e. paystubs versus Federal Income Tax Returns) the WAP Agency shall document any changed circumstances and include this documentation in the client file.

Any file for which the WAP Agency believes to demonstrate a risk of fraud or abuse shall be provided to the State Monitor assigned to the WAP Agency for review. The assigned State Monitor will review client file and determine referral to Program Integrity and Compliance Unit (PIC) for further review. Upon that referral, WAP Supervisor will

request review by PIC. Upon receipt, the Department will review the file documentation for compliance with all applicable Federal and State authority. Written correspondence on PIC review will be sent to the WAP Agency for further action if needed. Copy of written correspondence must be retained in client file. No payment for units weatherized will be approved until such time that the proper income verification documentation is in the client file.

### 3.4.1. Earned Income Documentation:

For applicants who report earned income:

The WAP Agency shall collect 4 of the most recent 5 weeks' worth of pay stubs (consistent with the LIHEAP procedure) to establish annual income provided the paystubs show year to date (YTD) earnings representing at least 3 months of earnings.

In cases where the paystub does not show year to date earnings or the YTD earnings shown represent less than three months' pay, the agency must collect additional pay stubs to verify a total of 3 months income; or if paystubs are not available, an original signed letter from the applicant's employer on employer letterhead must be obtained by the WAP Agency directly from the employer. This letter is not to be hand delivered to the WAP Agency by the applicant, but must be mailed, faxed, or sent as an e-mail attachment to the WAP Agency by the employer.

### 3.4.2. Other Income Documentation:

For all applicants who report any source of income other than earned income, the following documentation shall be considered acceptable verification documentation for non-earned income.

TYPE	ACCEPTABLE DOCUMENTATION
Alimony	Court Order, pertinent pages of separation agreement or divorce decree that identify client and amount of alimony. (If court ordered payments are not being received by the client, a notarized statement to this effect will be accepted)
Annuities	Statement dated within 60 days of certification from issuing organization
Dividends and Interest, as regular source of income	Statement dated within 60 days of certification from bank or brokerage firm
Estates and trusts, as regular source of income	Fiduciary statement or current statement from bank or brokerage firm
Insurance proceeds or	Statement from insurance company

dividends, as regular source of income	
Pensions, government or private	Award letter; a letter from administrative agency
Rents	Income tax form rent receipts; notarized statement from applicant listing each apartment and the rent received per month, as well as the description and amount of deductible expenses. When the tenant is a family member and is paying no rent to the owner, a notarized statement should be received from the tenant and signed by the owner stating that no rents are being collected.
Royalties	Income tax return; current statement from company issuing checks
Self-employment Income	Most recent Federal Tax return for the Business including all Schedules, whether, sole proprietorship, Limited Liability, S or C Corporation. Business records for three months prior to the date of application; notarized statement of gross adjusted income, including list of deductions and amounts, for previous three months
Social Security Benefits	SSA Benefit Verification letter; SSA-1099 Social Security Benefit Statement; or SSA form 2458 (Report of Confidential Social Security Benefit Information)
Strike Benefits	Award letter; copy of checks; letter from appropriate administrative agency
TANF Award Printout	Work First NJ (NJ's Temporary Assistance for Needy Families) award printout issued by the County's Welfare Agency.
Unemployment	Unemployment Income Statement issued by the New Jersey Department of Labor and Workforce Development, or a comparable statement issued by an agency or department of another State or Territory responsible for administration of unemployment benefits.
Veteran's Benefits	Award letter from Veterans Administration or the Department of Defense (DOD).
Worker's Compensation	Award letter from Workers Compensation Board; current check

### 3.4.3 Veterans Administration Benefits:

In order to reduce the red tape concerning Veterans Administration procedures, it is preferable for the Veteran to call 1-800-827-1000, give his/her V.A. file #, the amount of monthly benefit s/he receives and ask for a letter stating under what Public Law or U.S. Code Title his/her benefit is received. This call should result in a prompt written response from the V.A. which the WAP Agency can use to establish the

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Veteran's eligibility for Weatherization Assistance. Below is a list of titles covered by Sections of the "Veterans' and Survivors'" Pension Improvement Act of 1978:

- Section 415 – "Dependency and Indemnity Compensation to Parents of a Deceased Veteran".
- Section 521 – "Veterans of a Period of War (a Veteran who is permanently and totally disabled).
- Section 541 – "Spouses and Children" (of a deceased Veteran).
- Section 542 – "Children of Deceased Veterans of a Period of War".

### **3.4.4 Income Verification for Emergency Weatherization**

A WAP Agency may weatherize a unit in need of [emergency repairs](#) prior to obtaining all documentation required under Section 3 of this chapter, provided that:

1. Sections 3.1 Application, Section 3.2 Employment Information, and Section 3.3 Social Security Numbers are fully complied with;
2. Either the most recent Federal Income Tax Return for the applicant household is obtained or an IRS Form 4506T is signed by the applicant and submitted to the IRS requesting either verification of no filing or a tax return transcript;
3. Any required certification required under Section 1.3 Zero Income is obtained;
4. The WAP Agency obtains the necessary proof of ownership, or occupancy and consent of landlord;
5. The WAP Agency is able to income certify the household as eligible consistent with Federal guidance; and
6. The WAP Agency obtains an acknowledgement from the household applicant that s/he understands that 1) the applicant is requesting emergency services to be performed by the WAP Agency, 2) the applicant has completed the application and provided certain information to the agency in order to obtain those services, 3) the WAP Agency is relying on the information provided by the applicant in providing the services, 4) that the information provided by the applicant is true, accurate, and complete, and 5) should the information not be true, accurate or complete resulting in the household being determined to be ineligible for assistance under the NJ WAP, the household will be held responsible for any and all costs incurred by the WAP Agency in performing the emergency services.

**The Emergency Services Acknowledgement Form can be found in the Appendix.**

### **3.5 Additional documentation needed for the application**

As per Chapter 2 in the Policy Manual, the following documents are needed when completely the application to determine eligibility:

- Proof of Ownership with the renter/lease agreement included (for further details please see chapter 2 section 4)

- 
- 1 year energy consumption records

#### 4. Prioritization of Applicants

Federal WAP regulations (10 C.F.R. § 440) require that priority be given to “identifying and providing weatherization assistance to elderly and handicapped low-income persons...”

The ranking system operates as follows:

- 1) Intake and income/categorical eligibility determinations proceed as usual.
- 2) Following the determination of program eligibility, the household is evaluated to determine its priority status. This evaluation is based on the total household income and on the demographic status of each of the household’s members. Priority ranking points are awarded based on the following:

One point each for

- Presence of children ages 0-6 (up to 1)
- Each elderly household member (up to 2); see definition provided in section 4.1 (“Definitions of Disabled and Elderly”)
- Each disabled household member (up to 2); see definition provided in section 4.1 (“Definitions of Disabled and Elderly”)
- High Energy Burden (up to 1)
- High Residential Energy User (up to 1)

Three points for one terminally disabled household member, five points for more than one terminally disabled household member.

Note that one household member can qualify the household for points in more than one category.

- 3) An adjusted application date is calculated, based on the total household priority points.
- 4) For each point, six months are subtracted from the actual application date.
- 5) All eligible households are to be served on a first-come, first-served basis based on the adjusted application date.
- 6) Multi-family buildings are ranked on the waiting list based on the adjusted application date of the building’s highest priority individual eligible dwelling unit.

##### 4.1 Definitions of ‘Disabled’ and ‘Elderly’

‘Elderly’ persons are individuals who are at least sixty years of age.

For the purposes of weatherization, the terms ‘handicapped’ and ‘disabled’ are considered synonymous. Weatherization contracts define a handicapped person as follows:

Handicapped person is defined as any individual; (1) who is a handicapped individual as defined in Section 7(6) of the Rehabilitation Act of 1973; (2) who is under a disability as

defined in Section 1614(a) (3) (A) or 223 (d) (1) of the Social Security Act or in Section 102 (7) of the Developmental Disabilities Services and Facilities Construction Act; or (3) who is receiving benefits under Chapter 11 or 15 of Title 38, U.S.C.

To assist agencies with their determinations as to who qualifies for consideration as a handicapped/disabled individual, each of the defining criteria listed in the above definition is discussed as follows:

(1) Section 7 (6) of the Rehabilitation Act of 1973

This law defines a handicapped individual as one who has a physical or mental disability which constitutes a substantial handicap to employment, and who can be expected to benefit from vocational rehabilitation services.

(2a) Sections 1614 (a) (3) (A) and 223 (d) (1) of the Social Security Act

Social Security defines disability as an inability to engage in any substantial gainful activity by reason of any medically determinable physical or mental impairment which can be expected to result in death or which has, or will, last for at least twelve (12) continuous months.

(2b) Section 102 (7) of the Developmental Disabilities Services and Facilities Construction Act

This law defines a developmentally disabled person as one who suffers from a physical or mental impairment, which first appears before the age of twenty-two (22) and is likely to continue indefinitely. The impairment must result in substantial functional limitations in at least three (3) of the following: 1) self-care, 2) receptive and expressive language, 3) learning, 4) mobility, 5) self-direction, 6) capacity for independent living, and 7) economic self-sufficiency.

(3) Chapter 11 and 15 of Title 38, U.S.C.

These laws provide for the provision of monetary benefits to disabled veterans and their families. The different chapters of the law apply depending on whether the disability was acquired as a result of military service or civilian activity.

## 5. Qualified Aliens

Qualified aliens defined in Section 431 of the Federal Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996, P.L. 104-193, if otherwise eligible, may receive WAP services (see N.J.A.C. 10:90-2.10 and 10.3). Qualified aliens are defined as legal immigrants that include, but may not be limited to: legal permanent residents, refugees, asylees, individuals paroled into the United States for a period of at least one year, individuals whose deportation has been withheld, individuals granted conditional entry, and certain individuals who are victims of domestic abuse.

In cases where a non-qualified alien resides within an applicant household, the non-qualified alien must be excluded from the household size. The monthly income of the unqualified alien shall be counted as income to the household, and must be added to all other household income in determining the household's gross monthly income.

## **6. Providing Weatherization to Tenants Residing in WAP Agency's Owned Property**

To ensure that applicants are served based on program policy and procedures, an inspection of file documentation including work scope must be completed by the State Program Monitor before work is authorized.

The State Monitor will confirm the following:

- 1) The occupant is income eligible for the program.
- 2) The unit is being served based on the applicant waiting list priorities.
- 3) The proposed work scope is based on the audit of measures for 1-4 family dwellings, or have and SIR of 1 or greater based on DOE approved waiting list.
- 4) WAP Agency owned transitional housing and/or shelter will be treated in the same manner as such properties that are not agency owned.
- 5) The daily monitoring report will reflect the review of the applicant information and proposed work. If any discrepancies are noted, the WAP Agency will address the issues before any work is completed.

## **7. Provision of Service to WAP Agency Employees, Volunteers, Board Members, and their Relatives**

If the weatherization applicant is connected to the WAP Agency in some way, i.e. applicant is an agency employee, board member or volunteer; or is related to someone who is an agency employee, board member or volunteer is a tenant residing in a building which is owned or managed by someone connected to the WAP Agency, provided that these persons are eligible for service based on the contractual eligibility criteria, s/he may receive service per standard procedures, as augmented by the additional steps required below.

When serving a connected applicant, all weatherization personnel must be alert to the potential for an appearance of favoritism which could harm the public reputation of the WAP Agency and the program. The appearance of favoritism will be avoided through a policy consisting of three parts: DISCLOSE DELEGATE and DOCUMENT WAP Agency actions.

- 1) DISCLOSE - Whenever a "connected" applicant is identified, written notification should be made by the person who recognizes the connection. This notification should be addressed to the WAP Agency Executive Director and routed to him/her through the agency chain-of-command. If the applicant is connected to the Executive Director, this notification should be addressed to the Chairperson of the agency's Board of Directors,

and copied to the agency Executive Director. In addition, the Weatherization Manager will inform the OLIEC in writing of the identification at the time of application. These notifications must state:

- a) How the applicant (or the occupant's landlord/building manager) is connected to the WAP Agency.
  - b) At what point during the weatherization process did the identification take place.
- 2) DELEGATE - The decision to proceed with service to a connected applicant must be delegated to the WAP Agency's Board of Directors. The WAP Agency Board of Directors must grant written authorization to proceed with the provision of service. The WAP Agency Board of Directors should meet in Executive Session when considering the authorization of service to a connected applicant in order to preserve client confidentiality. This authorization must explicitly certify that the applicant will not receive any extra benefits as a result of his/her connection. These benefits may include, but are not necessarily limited to, the position of the dwelling unit on the agency's waiting list and the amount and/or type of services provided (undue or excessive enhancement).

In addition, the various activities involved in providing weatherization service (verifying eligibility, conducting pre- and post-weatherization inspections, etc.) should also be delegated to someone who is not personally involved with the connected individual. An estimator who is an applicant for weatherization, for example, should not inspect his own residence. In all such cases, the Weatherization Manager should provide very close supervision to prevent inappropriate benefits from accruing to the connected applicant.

- 3) DOCUMENT - The purpose of the client file contents is to provide a clear and accurate history of the client's involvement with the weatherization program. This is especially important whenever there is a potential for the appearance of favoritism. At a minimum, the written notifications to the OLIEC and the WAP Agency's Executive Director (or Board Chairperson) that a connected applicant has been identified and the Board's authorization/certification to proceed with the provision of services must become part of the client file. Contemporaneous documentation of WAP Agency actions within the client file provides a much more convincing explanation of agency decisions than after-the-fact assertions.

Failure to follow the procedure described above may result in a decision by the OLIEC to disallow the costs of weatherizing a building owned or occupied by a connected applicant.

**A mandatory state inspection will be performed on all units under this category.**