

## Best Practices – Shelters

**Date:** Revised January 4, 2017

**Subject:** Weatherizing Shelters

**Problem or Question:** We have had several shelter applications to our weatherization program. Can you please clarify the existing regulations, policies, and current practices in regard to weatherization of shelters in the weatherization program?

**Discussion:** Shelter Weatherization Authorization Authority: *DOE Weatherization Assistance Program for Low Income Persons, 10 CFR Part 440, 1 February 2002, Final Rule* allows for the weatherization of shelters. The *Final Rule* states on page 18: “A State may weatherize shelters. For the purpose of determining how many dwelling units exist in a shelter, a grantee may count each 800 square feet of the shelter as a dwelling unit or it may count each floor of the shelter as a dwelling unit.” Thus, a 4800 square foot shelter, for example, equates to six 800 square foot dwellings (up to \$42,630 in potential expenditures {six times \$7105}, not including necessary health and safety expenditures—See H&S Best Practice.

**Shelter Definition:** On page 4 of the 10 cfr 440 Final Rule states, “Shelter means a dwelling or units whose principal purpose is to house on a temporary basis individuals who may or may not be related to one another and who are not living in nursing homes, prisons, or similar institutional care facilities.”

*Required* procedures to enable the shelter to be considered for the WAP Weatherization Program:

- The shelter administrator must provide a letter or document from the IRS certifying 501c3 status including an approval statement recognizing the organization as a “shelter.”
- Subrecipient should present the landlord with the agreement form to gain permission to conduct an energy audit. <http://www.tdhca.state.tx.us/community-affairs/wap/docs/10-WAPLandlord.pdf>
- There are no qualification or application requirements for individuals seeking refuge at the shelter. The assumption is that if a shelter exists, it is because the shelter is providing for transient people in temporary need, thus no income qualification is required for individual entry in the program.

*Recommended* procedures when weatherizing shelters:

- There are components of both multi-family and individual homes in shelters.
- If the rooms are similar to bedrooms in construction and have no sources of combustion, then the whole building should be treated as a whole house.
- If the rooms have gas kitchenettes or space heaters or other sources of combustion in the room, then the space is treated as a separate dwelling, with a whole-house assessment for each dwelling area.
- Consider using the attached “Multi-Family Packet” to collect and process shelter applications. It has proven effective for other agencies processing shelter applications. The packet has information requests unique to larger organizations, with building or floor points of contact, etc. The shelter

coordinator, functions as a multifamily landlord in several operational ways and the packet addresses these important information requirements and agreements.

- Sometimes it is difficult to draw a line between dwelling-space and what is office-space in shelters. Office-space often doubles as meeting and recreation space for those people at the shelter. Often the entire shelter only has one electricity or gas meter. Because of this difficulty of “zoning off” office space from living space and because the offices are inside the common-metered building, in most cases such as this the whole building should be weatherized.

In the case of businesses run out of people’s homes or garages, the office space is usually separated from the living space to allow weatherization of the living space only. However, shelters are categorically different in that they provide a service to the community and often the “administrative area” is part of the house and is also used by those seeking shelter. In the case of shelters whose office space is in the same buildings as the dwelling it is allowable to weatherize the whole building. If the shelter’s office space is in a separate building from the shelter then the office space should not be weatherized, as the WAP ARRA program focuses on home weatherization.

- Consider the below FAQ’s which address some common shelter weatherization questions.

#### **FAQ’s in regard to shelter weatherization:**

1. When going through the intake stage for a shelter, how do we handle the income verification step? Most shelters do not have a resident population that we could expect to collect documentation from which is required by our contract. ***Income verification is not required for bona fide shelters that have IRS status as a shelter, as verified on the federal form (IRS) certifying 501C3 status including an approval statement recognizing the organization as a “shelter.”***
2. Another component of intake is to document the utility consumption for each residence. What are the requirements for a shelter? ***Collect their utility consumption documents/bills. They should be, if possible, from the utility company for the last 12 months. If the documents are incomplete, then the shelter should contact the utility company for the missing bills or energy consumption statements. This will enable you to accept the utility documentation packet.***
3. The landlord agreement should be signed in the same manner as we do for an apartment complex, correct? ***Yes, that is correct.***
4. Based on 800 sq ft assumptions discussed above and in 10 CFR Part 440, if there are 24 units or less then we can proceed with the weatherization, correct? ***Yes, that is correct.*** It may not be practical to run a blower door in a dormitory configuration....in that case could we not run blower doors on all the units? ***No, a blower door needs to be run for each unit along with all applicable combustion testing for each unit. NOTE: Blower door tests usually require that an external door be used; a faulty CFM reading will likely result when the blower door is used indoors. However, indoor usage (if all other external doors are open) is sometimes used to check for air-infiltration leakage in the room(s) in question. Another technique, in very large homes/shelters, is to use two or three blower doors that are turned on at the same time and all on the 50CFM monometer setting. Using the 50CFMs setting***

*will record CFMs at 50 Pascal's even if the blower door does not get to 50 Pascal's. The CFMs should be added together (and compared with a single door reading to ensure reliability).*

5. At our multi-family training we were told that we could address central systems like hot water and AC. What evaluation tools can we use to determine if a central system would have an SIR greater than 1.0 for replacement? If we are using the Priority List, then I would imagine we would have to skip central systems, correct? *No, whether you use the energy audit or the Priority List you can address central systems in the shelter in question. TDHCA and DOE request that, in the case of large, central AC Systems (generally 6 tons and over), Subrecipients arrange for a certified commercial HVAC specialist to assess the system in question and produce a written HVAC engineering assessment. The costs of assessments (regardless if work is authorized or not) are covered under the WAP program; this is similar to how whole-house assessments are required and funded by the WAP program. The recommendations made in the assessment should be included in a packet (along with the assessment, audit, narrative description of work (SOW), photos, and the proposed work order). Send the packet to Department program staff at TDHCA, before any physical work is authorized or done. TDHCA will evaluate and approve/disapprove/modify your request for WAP funds to be used to address large central air systems in shelters.*

**Recommendation Summary:** Weatherize shelters with prior Department approval. This best practice is an effort to clarify existing regulations, policies, and current practices in regard to weatherization of shelters in the Weatherization Program to help guide Subrecipients and subcontractors in the outreach, assessment, audit, weatherization, and work-validation of shelters in Texas. Contact Department program staff if you have any questions or need additional clarification.

[TAC §5.525](#) (c) states: *“In order to weatherize shelters, Subrecipients shall submit a written request for approval from the Department. Approvals from the Department must be received prior to the installation of any measures.”*