

Best Practice –WAP Multifamily Weatherization

Date: Revised January 4, 2017

Subject: Multifamily Weatherization

Problem or Question: Our intake staff is looking to bring in several multifamily homes into the weatherization program. How should we go about selecting and weatherizing multifamily homes? How is it different from single-family homes?

Discussion: Multifamily weatherization endeavors are challenging at first, but once the Subrecipient has experience, multifamily weatherization can bring benefits to many clients efficiently and effectively. Multifamily intake and data collecting can also be challenging. There is an example application and data collection packet for multifamily housing attached to this best practice or available on the TDHCA website at <http://www.tdhca.state.tx.us/community-affairs/wap/docs/09-WAP-MF.pdf>. The multifamily forms on the website are the minimum required forms needed to start the assessment process and are listed below. This benchmark document has proven effective in providing landlords' guidance and enabling agencies to collect needed information quickly and effectively. This results in speedy file evaluation and approval, if warranted.

Shelter specific information is covered in the Shelter Best Practice available on TDHCA's WAP Best Practices webpage.

A multifamily building is defined as a group of 5 dwellings or more under the same roof. Multifamily building weatherization is broken into two general categories:

- 1) 24 units in one building or less.
- 2) 25 units in one building or more.

In both cases, a complete and comprehensive initial assessment is required, just like at a single family unit. All applicable diagnostic tests are still required and should be utilized to gather as much valuable information about each individual unit as possible.

In the first case, utilizing the assessment documentation effectively will provide the whole-house assessments and justifiable work-orders for the multifamily building. The assessments of individual units should be "stitched together" to provide a whole-building assessment to be used as the basis for all weatherization work. Care should be taken to evaluate and understand the effects of exterior walls, hallways, common ducting, stack effects, and other multifamily factors. Use of the energy audit or Priority List can be used to justify weatherization measures installed.

In the second case: multifamily buildings with 25 units or more under one roof, neither the current energy audit (NEAT) nor the LIHEAP Priority List are approved to address multifamily buildings of this size. Additional funding sources other than LIHEAP must be used to weatherize a multifamily building of this size. If Subrecipients have a uniquely specific situation for the Department to consider, please contact the Department program Staff.

Typically when addressing a multifamily project the greatest savings are typically achieved by addressing the following measures:

- Air sealing should be performed wherever possible and in a workman like manner. Remember: ventilate right so you can air seal tight!

<http://www.tdhca.state.tx.us/community-affairs/wap/wap-best-practices.htm>

- Ensure a sufficient thermal boundary – sufficient insulation in attics/walls/floors (if applicable).
- Duct sealing is generally a favorable measure when addressing multifamily. When duct sealing make sure to address fur downs by sealing them as much as possible. Sealing the supply plenum is also very important as the most pressure in the duct system is generally in the plenum. All registers should be sealed at the boot and mastic should be applied as far back into the system as can be reached. Seal the return air chase to ensure that unconditioned air from wall cavities, etc. is unable to get into the HVAC unit, causing it to work harder.
- Baseload measures should be addressed as they typically have good results in multifamily weatherization. These measures include but are not limited to showerheads, aerators and light bulbs.
- Replacing allowable appliances and tuning up or replacing HVAC systems are generally another thing that can be a substantial energy saver in multifamily projects.

Remember, weatherization will likely only be performed one time on each project so make it count. Address and maximize every justifiable measure you can while you are there.

The following information applies to all multifamily buildings undergoing weatherization, regardless of size.

- The weatherizing agency may be faced with common HVAC units, common hot water sources, or large “chillers” and furnaces that provide hot and cool air to the entire building. In such cases, especially when these systems will be evaluated for replacement, an HVAC engineering assessment should be completed prior to any weatherization work. This should be accomplished under advisement of TDHCA Training Staff.
- 66% rule: at least 66% of the residents in a multifamily building **must** qualify for the weatherization program for the building to be weatherized. For example, in a 20 unit building, 14 tenants must qualify. In this example, this building, if weatherized with LIHEAP only, would then be authorized \$91,000 in weatherization funds (\$6,500 x 14, not including necessary health and safety expenditures). In this case, the money for the weatherization will be pooled and used to weatherize the building as best as possible using a whole-house assessment and Priority List. The particular qualified tenant’s units will not be weatherized to the exclusion of the rest of the tenants; the weatherization will be best applied to weatherization the entire building, benefiting all tenants. In other words, if you look into the attic of a weatherized multifamily building you will not see insulation lumped over only one unit, but rather evenly distributed over the attic floor.
- 50% rule (in the case of duplexes or four-plexes): at least 50% of the tenants **must** qualify. For example, in a 2 unit building, 1 tenant must qualify. In this example, this building, if weatherized with LIHEAP only, would then be authorized \$6,500 in weatherization funds (\$6,500 x 1, not including necessary health and safety expenditures) to be spent on both units. Note: every effort should be made to conduct a blower-door test and the applicable combustion tests in adjacent neighboring units; this should be accomplished because this test provides the “whole-house assessment” with information about the thermal boundary.
- If roof repair is to be considered as part of repair cost under the weatherization process, the expenses must be shared equally by all eligible units weatherized under the same roof. If multiple storied buildings are weatherized, eligible ground floor units must be allocated a portion of the roof cost as well as the eligible top floor units.
- All weatherization measures installed in multifamily units must meet the standards set in 10 CFR §440.18(c) (9) and (15) and Appendix A--Standards for Weatherization Materials. LIHEAP will

continue to follow the rules of eligibility of multifamily units outlined in 10 CFR §440.22(a) (excerpted below).

- WAP Subrecipients shall establish a multifamily master file for each multifamily project in addition to the individual unit requirements found in the record keeping requirement section of the contract. Subrecipients shall maintain a multifamily master file for each complex weatherized. The multifamily master file must include, at a minimum, the following forms: (Forms available on the Departments website).
 - (1) Multifamily Pre-Project Checklist Form;
 - (2) Multifamily Post-Project Checklist Form;
 - (3) Permission to Perform an Assessment for Multifamily Project Form;
 - (4) Landlord Agreement Form;
 - (5) Landlord Financial Participation Form; and
 - (6) Significant Data Required in all Multifamily Projects.
- For DOE units: as stated in WPN 15-4 Quality Control Inspectors (QCI) working for, or contracted by, the WAP must possess the knowledge, skills and abilities in the National Renewable Energy Laboratory (NREL) Job Task Analysis (JTA) for Quality Control Inspectors. This applies to all individuals who perform an evaluation and sign off on work performed in homes, including final inspectors and Grantee monitoring staff. Additionally, QCIs working in multifamily buildings must attend, and receive a successful evaluation from a training program delivering a curriculum based on the NREL Multifamily Quality Control Inspector JTA. Materials installed must meet applicable Standard Work Specifications.

Excerpt of 10 CFR Part 440.22 covering eligibility of multifamily housing:

(b) A subgrantee may weatherize a building containing rental dwelling units using financial assistance for dwelling units eligible for weatherization assistance under paragraph (a) of this section, where:

- (1) The subgrantee has obtained the written permission of the owner or his agent;*
- (2) Not less than 66 percent (50 percent for duplexes and four-unit buildings, and certain eligible types of large multi-family buildings) of the dwelling units in the building:*

(i) Are eligible dwelling units, or

(ii) Will become eligible dwelling units within 180 days under a Federal, State, or local government program for rehabilitating the building or making similar improvements to the building; and

- (3) The grantee has established procedures for dwellings which consist of a rental unit or rental units to ensure that:*

(i) The benefits of weatherization assistance in connection with such rental units, including units where the tenants pay for their energy through their rent, will accrue primarily to the low-income tenants residing in such units;

(ii) For a reasonable period of time after weatherization work has been completed on a dwelling containing a unit occupied by an eligible household, the tenants in that unit (including households paying for their energy through their rent) will not be subjected to rent increases unless those increases are demonstrably related to matters other than the weatherization work performed;

(iii) The enforcement of paragraph (b)(3)(ii) of this section is provided through procedures established by the State by which tenants may file complaints, and owners, in response to such complaints, shall demonstrate that the rent increase concerned is related to matters other than the weatherization work performed; and

(iv) No undue or excessive enhancement shall occur to the value of the dwelling units.

(c) In order to secure the Federal investment made under this part and address the issues of eviction from and sale of property receiving weatherization materials under this part, States may seek landlord agreement to placement of a lien or to other contractual restrictions;

(d) As a condition of having assistance provided under this part with respect to multifamily buildings, a State may require financial participation, when feasible, from the owners of such buildings. Such financial participation shall not be reported as program income, nor will it be treated as if it were appropriated funds. The funds contributed by the landlord shall be expended in accordance with the agreement between the landlord and the weatherization agency.

(e) In devising procedures under paragraph (b) (3) (iii) of this section, States should consider requiring use of alternative dispute resolution procedures including arbitration.

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