
ATTENTION OF:
All Louisiana Weatherization Assistance Program
(WAP) Providers

NOTICE: WAP-2019-01

ISSUED: March 11, 2019
EFFECTIVE: May 1, 2019

This notice remains in effect until amended,
superseded, or rescinded

SUBJECT: Updated Louisiana Weatherization Invoicing Guidelines

This Notice hereby replaces Sections 5.1, 5.2, 5.3, and 6.3 of the Louisiana Weatherization Assistance Program Guide and will be incorporated into Version 7 of the Guide to be released later this year. The revisions are being published on March 11, 2019. This guidance will apply to invoices received by LHC on or after May 1, 2019.

In accordance with Section 7.2 and Section 8.1 of Weatherization Assistance Program (WAP) Subaward Agreement, *The Corporation shall have the sole right and authority to approve the Services being performed under this Agreement....Subrecipient must actually expend or obligate money before requesting reimbursement. Requests for reimbursement shall be submitted monthly and shall be received in the LHC Energy Department, on or before the 7th day of the month following the month the services are delivered and expenditures are incurred. Failure to fully complete the required documents, including statistical data, may result in the form being returned without payment or being held until such time as the correct information is received by the LHC. Payment will be made only upon approval of the LHC Administration.*

In an ongoing effort to improve the quality of oversight, transparency, and auditable trail, the Louisiana Housing Corporation (LHC), "Grantee", has clarified and expanded the guidance relative to monthly invoice submissions for the Weatherization Assistance Program.

I. General Requirements

- a. All requests for reimbursement must be documented and invoiced in accordance with each Subgrantee's LHC **accepted** Cost Allocation Plan, which must include both Low Income Home Energy Assistance Program (LIHEAP/DHHS) and Department of Energy (DOE) funding sources for Weatherization. No invoices will be approved prior to the acceptance of a Cost Allocation Plan and submission of proof that the required insurance coverages have been met each year.

- b. All monthly requests for reimbursement must be signed and submitted to LHC in Hancock Energy Software (HES) by the 7th day of the month (or next business day in the event of a holiday or weekend) following the month that weatherization services were completed and expenditures were incurred. The HES system currently has a grace period until the 15th of the month, at which point the system will automatically lock and restrict any changes to the invoices. LHC will work with Subgrantees to ensure invoices are reviewed and finalized prior to the grace period ending. LHC will evaluate the grace period on an ongoing basis to ensure the effectiveness of the process and will notify Subgrantees if any proposed changes are anticipated in the future.
- c. The following items must be submitted via email to the LHC Energy Assistance central inbox with a cc: to the assigned LHC staff member in conjunction with the submission through HES:
 - i. Corresponding HES Invoice signed by a representative with signature authority for the Subgrantee
 - ii. Proof of obligation (“invoice”) for any **individual** expenditures **over** \$1500 in accordance with Section II. c. and Section III. m. of this Notice
 - iii. **Attachment A** of Notice WAP-2019-01 (optional for those who enter the corresponding detail into the HES invoice directly)
 - ❖ **Note: Subgrantees on Probation or Watchlist may be subject to additional invoice back-up requirements on a monthly basis.**
- d. Subgrantees must maintain all supporting documentation to validate the details of all expenses requested for reimbursement on an invoice. Proof of obligation (“invoice) should be maintained in the file followed by proof of expenditure once paid, unless an acceptable explanation can be provided, as well as all detail for calculated figures (such as salaries).
- e. All monthly invoice supporting documentation must be dated and related to the period covered by the invoice as much as possible within the Subgrantee’s control. (See Section III. h. for additional information related to bulk material purchases).
- f. No requests for reimbursement may be submitted in the next program year’s invoices for an expense that occurred in the prior program year. This is a federal requirement that funds may only be expended for the grant period for which funds have been obligated.

- g. Supporting documentation may periodically be requested by LHC while reviewing the invoice or during a desk review when agency detail is not clear within the invoice or if an item is found to be questionable while reviewing the invoice for payment. Subgrantee must make any supporting documentation available upon LHC request.
 - i. If detail is not entered into HES or Attachment A of this Notice, the Subgrantee may be required to make additional notes.
 - ii. If an item is still found to be questionable after review of the requested documentation, LHC will request clarification and/or justification in writing.
 - iii. In the event an expense is found to be ineligible for reimbursement, the Subgrantee will be notified in writing and given the opportunity to correct the invoice prior to LHC adjustment of the invoice.
- h. LHC will perform semi-annual on-site monitoring reviews to review programmatic, fiscal, and invoicing documentation. LHC will also perform occasional limited quality control monitoring reviews by LHC supervisory personnel or quality control inspector to ensure LHC's internal monitoring standards are being met.
- i. Should a Subgrantee be reimbursed or otherwise compensated for any ineligible activity or expense, the Subgrantee shall reimburse LHC an amount equal to the payment made for the ineligible activity or expense (Weatherization Assistance Program (WAP) Subaward Agreement, Section 2.4.4).
- j. In the event budgeted category amounts **exceed** a Subgrantees' need, Subgrantees should request budget revisions to move monies to Program Operations A to weatherize additional homes where funds are sufficient.
 - i. Subgrantees' need is defined as approved, allowable, and reasonable purchases needed to sustain the Weatherization Assistance Program.

ii. No revisions to move budgeted funds into the following categories will be approved:

- Administration
- Health and Safety
- Training and Technical Assistance, and
- Vehicle and Equipment

These funds have limitations per DOE and DHHS requirements, and revisions resulting in increases will cause the State to exceed the authorized amounts for the current program year.

iii. Requested budget revisions resulting in increases to the Incidental Repair category (DHHS), Financial Audit category (DOE), Liability Insurance category, or Program Operations B category will be reviewed to ensure cost allocation across a Subgrantee's programs has been met and that costs are allowable and reasonable prior to approval. Approval will be granted on a case-by-case basis.

II. Administrative Cost Category Requirements

a. Administrative expenses include the costs for general administration; program coordination; indirect (overhead) costs; supportive services including accounting, human resource, and procurement; development of policies, goals and objectives; and administrative monitoring. Examples include:

- i. Salaries and benefits of staff performing administrative and coordination functions (fiscal, executive, and support);
- ii. Preparation of program plans, budgets, and schedules;
- iii. Monitoring of programs and projects;
- iv. Fraud and abuse prevention;
- v. Procurement activities;
- vi. Public relations;
- vii. Services related to accounting, litigation, audits, management of property, payroll, and personnel;

- viii. Costs for goods and services required for administration of the program such as the costs for supplies, equipment, postage, utilities, and rental of office space and maintenance of office space, provided that such costs are not excluded as a direct administrative cost for providing program services;
 - ix. Uniforms for administrative personnel in support of WAP services, as well as WAP Coordinator expenses that exceed Program Operations B uniform thresholds, if needed;
 - x. Trainings and/or Meetings related to fiscal training, strategic planning, and overall staff development; and
 - xi. Management information systems not related to the tracking and monitoring of WAP requirements (e.g., for a personnel or payroll system for staff).
- b. Administrative expenses must be documented and supported by invoices/paid receipts, LHC accepted Cost Allocation Plan, personnel title and time, or other LHC accepted forms of documentation. Documentation must be maintained as described in the General Requirements of this Notice.
- c. Requests for reimbursement of an individual expense in Administration **over** \$1500 must include proof of obligation (invoice) with the monthly invoice submission for verification and quality control measures.

III. Program Operations Cost Category Requirements

- a. All requests for reimbursement should be tied to the completed unit when possible in Program Operations A (materials, labor, actual personnel costs, gas/mileage, rental, and required fees related to building permits from local governments).
 - i. Program Operations A includes employment of personnel directly related to the operation of the Program:
 1. Weatherization Coordinators' salary and fringe benefits (i.e. retirement, taxes, and healthcare) spent in actual supervision of labor, client intake, recordkeeping, etc.
 2. Weatherization Crew Leaders, Crew Members, Subcontractors, and Quality Control Inspectors' salary and fringe benefits

- ii. Costs for materials tied to a unit should be based on the actual costs installed per unit and not disbursed across units. This allows LHC to properly evaluate the actual costs per unit associated with weatherizing a home.
 - iii. When costs exceed Program Operations A measure limits in LHC's Weatherization Software (Hancock Energy Software), Subgrantees must request approval from LHC. LHC's review may include a request for supporting documentation including, but not limited to, invoices, work orders, etc. to adequately evaluate the request.
- b. Program Operations B costs are defined as those direct costs which contribute to providing Weatherization services but which cannot be tied directly to one completed unit. Program Operations B may include:
- i. Transportation of weatherization tools, equipment, and work crews to a storage site and to places related to Weatherization but not tied to one unit (gas/mileage, vehicle maintenance, and vehicle insurance),
 - ii. Maintenance of weatherization tools and equipment,
 - iii. Purchase or annual lease of tools and equipment less than \$5,000 that are not directly tied to a unit,
 - iv. Fringe Benefits not directly connected to a unit: Holiday, Vacation, and Sick Leave of direct personnel
 - v. Costs incurred for Denied units,
 - vi. Space rental for the storage of weatherization materials, tools, equipment, and weatherization vehicles,
 - vii. Employee's time for participation in an approved training event,
 - viii. Uniforms for Weatherization Crew Leaders, Crew Members, Energy Auditors, and Quality Control Inspectors not to exceed more than \$200 per person per program year and uniforms for Weatherization Coordinators not to exceed more than \$150 per program year (additional expenses for Coordinators would be allowable as an Administrative Cost), and
 - ix. Personal Protective Equipment (PPE) for direct personnel performing Weatherization functions including safety goggles, masks, respirators, Tyvek suits, or fans to circulate attic heat while insulating during summer months.

- c. Program Operation expenses must be documented and supported by invoices/paid receipts, LHC accepted Cost Allocation Plan, personnel title and time, or other LHC accepted forms of documentation. Documentation must be maintained as described in the General Requirements of this Notice.
- d. Personnel timesheets must be auditable and demonstrate where Weatherization direct personnel time is spent (i.e. supervision of labor, working at a unit, client intake, recordkeeping, vehicle maintenance, denied unit, picking up materials, holiday, leave, etc.)
- e. The fully completed LHC Quality Control Final Inspection Form, Client Sign Off Form, and Subgrantee Sign Off Form on a completed unit may be randomly selected for review and submission to LHC during review of the invoice or during desk monitoring.
- f. Expenses associated with denied units must be documented and supported with the reason for denial, personnel time spent, and mileage expenses if incurred. Documentation must be maintained as described in the General Requirements of this Notice.
 - ❖ Please note that LHC's Weatherization Software (Hancock Energy Software) has a denied unit function that is not working properly as of this Notice. When the software function modifications are released, this function should be used to report denied unit costs.
- g. Expenses on units that require work revisited and have already been submitted on an invoice as complete ("re-works") are not an allowable expense and will not be reimbursed. If it is found that a Subgrantee has been reimbursed for additional work required to a unit to bring weatherization standards to acceptable levels after invoicing has occurred, then the Subgrantee will be responsible for reimbursing LHC for additional monies invoiced and received.
- h. Purchasing materials in bulk as a cost-effective approach is an LHC accepted method; however, funds may only be expended for the grant period for which funds have been obligated. Subgrantees who purchase in bulk must keep an auditable inventory of materials that will demonstrate materials purchased in one grant period are not used in a future grant period. Subgrantees who use a bulk purchasing option for materials must ensure that materials purchased will be used within the current grant period or be subject to a return of funds at the end of the program year. Request for reimbursement may occur in Program Operations B upfront followed by a measure entered into Program Operations A with a \$0 cost when the material is actually installed in a completed unit.

- ❖ Please note that LHC’s Weatherization Software (Hancock Energy Software) has a bulk purchase function that is not working properly as of this Notice. When the software function modifications are released, this function will allow users to enter purchases and submit a measure on a completed unit when incurred.
- i. Automobile/vehicle insurance expenses charged to Program Operations B must be documented and supported by a copy of the policy showing the effective date and the pro-rated share charged to the DOE and DHHS Weatherization funding sources. Documentation must be maintained as described in the General Requirements of this Notice.
- j. Pre-paid lease expenses (space rental and equipment) cannot exceed the Weatherization program year for which funding is being received. This is a federal requirement that funds may only be expended for the grant period for which funds have been obligated. Documentation must be maintained as described in the General Requirements of this Notice.
- k. Gas/fuel expenses must be documented and supported by a mileage log, GPS tracking, or other sufficient documentation, which details the address of the unit inspected and/or worked, date, and the purpose of the trip. A Subgrantee must only request reimbursement for gas/fuel related to LHC/DOE approved Weatherization activities. Documentation must be auditable and able to easily support that reimbursement for gas/fuel is not occurring for personal use of vehicles or for other programs.
- l. Subgrantees may request reimbursement for Weatherization vehicle fuel based on mileage or gas but may not request both, which leads to a duplication of reimbursement. This expense should be invoiced to a unit in Program Operations A where applicable.
- m. Requests for reimbursement of individual expense items in Program Operations B **over** \$1500 must include proof of obligation (“invoice”) with the monthly invoice submission (i.e. vehicle maintenance, bulk purchase, etc.) for verification and quality control measures.
- n. Acquisitions that require prior LHC approval (\$3,000 - \$4,999) must not be invoiced for until a Subgrantee has received an executed approval per the LA Vehicle and Equipment Guidelines (Attachment B).

IV. Health and Safety Cost Category Requirements

- a. The LHC/DOE approved *Health and Safety Plan* currently in effect governs allowable Health and Safety cost measures and guidelines for the program year.

- b. Inspections by a licensed 3rd party are acceptable health and safety expenditures when a pre-inspection has indicated a specific need for it (electrician, etc.). Inspections will not be reimbursed for a licensed inspection on every unit without documented justification of the need by the Subgrantee.

V. Financial Audit Cost Category Requirements

- a. Subgrantees must submit an annual audit report to LHC annually within 90 days of the end of the Subgrantee's fiscal year end.
- b. Audit expenses charged must be documented and supported by a copy of the invoice/receipt from the Certified Public Accountant showing the pro-rated share charged to the DOE and DHHS Weatherization funding sources in accordance with the LHC accepted Cost Allocation Plan. Documentation must be maintained as described in the General Requirements of this Notice.

VI. Liability Insurance Cost Category Requirements

- a. At the beginning of each program year, Subgrantees are required to submit Certificates of Insurance reflecting proof of required coverage. The Certificates are to be received and approved by LHC before work commences. Subgrantees are also required to submit the declarations pages and the cancellation provision endorsement including LHC for each insurance policy (i.e. Commercial General Liability, Workers Compensation, Automobile Liability, Employee Theft, etc.)¹
- b. Automobile/vehicle insurance on Weatherization vehicles is a Program Operations B direct cost and not an allowable item under this cost category.
- c. Insurance expenses charged must be documented and supported by a copy of the premium invoices/receipts showing the effective date and the pro-rated share charged to the DOE and DHHS Weatherization funding sources in accordance with the LHC accepted Cost Allocation Plan. Documentation must be maintained as described in the General Requirements of this Notice.

¹ WAP Subaward Agreement – Article 11 – Insurance Requirements

VII. Training and Technical Assistance Cost Category Requirements

- a. It is recommended that Subgrantees request pre-approval from LHC for non-LHC provided training expenditures to ensure reimbursement and applicability to the Weatherization program prior to invoicing. The LHC approval should be maintained with the Subgrantee's invoice supporting documentation. LHC will occasionally post memorandums in regards to allowable non-LHC training opportunities. The memorandums will serve as the necessary support documentation for the invoicing file.
- b. Training and technical assistance expenses must be documented and supported by the associated proof of expenditures, agendas, and sign-in sheets (as applicable).
- c. Subgrantees may request LHC to pay for Building Performance Institute (BPI) certifications and other necessary Weatherization training courses out of LHC funds rather than using Subgrantee awarded amounts. All requests are subject to review, funding, and approval.

VIII. Vehicles and Equipment Cost Category Requirements

- a. Subgrantees must have budgeted funds in the Vehicle and Equipment budget in order to request vehicle and equipment expenditures in excess of \$5000 within a program year.
- b. Despite having budgeted funds, Subgrantees must have prior LHC and DOE approval for vehicles and equipment greater than or equal to \$5,000 before submitting a request for reimbursement on an invoice. Requests must be submitted using the LA Vehicle and Equipment Guidelines and Forms (**Attachments B and C**).
- c. Subgrantee requests for vehicle and equipment budget funds in the next program year must be submitted by February 15th each year for LHC review, evaluation, and possible inclusion in the next program year's DOE State Plan and budget.

In accordance with Section 2.4.4 and Section 5.4.2 of Weatherization Assistance Program (WAP) Subaward Agreement, *LHC shall provide technical assistance, training, and support as reasonably necessary to ensure the compliance of each Subrecipient with the applicable rules and regulations of WAP.... The Subrecipient shall be responsible for keeping current with the modification to the Program Guide. Modification to the Program Guide shall be made available by the LHC to the Subrecipient either in hard-copy or in electronic forms, including posting on the LHC's website. The Subrecipient will be notified by mail and electronically (email or fax) of the availability of modifications to the Program Guide and shall implement the changes in the Program Guide upon receipt of such notice, unless otherwise specified by the Corporation.*

If you have any questions regarding this notice, please contact the LHC Energy Assistance Department at E4@lhc.la.gov or Lauren Holmes at lhartley@lhc.la.gov or 225-763-8700.

Attachment A: LA WAP Invoice Detail Workbook

Attachment B: LA WAP Vehicle and Equipment Guidelines

Attachment C: LA WAP Vehicle and Equipment Purchase Request Form

Louisiana Housing Corporation (LHC)
Energy Assistance



[Subgrantee] WAP INVOICE DETAIL FOR [Month] [Year]

Budget Type	Program Year	Invoice Start Date	Invoice End Date	Date of Expense	Percentage WAP Responsibility	Total Bill Amount	Funding Source	Percentage Allocated to Funding Source	Amount Allocated to Funding Source	Funding Source	Percentage Allocated to Funding Source	Amount Allocated to Funding Source	Description
Liability Insurance	2018	1/1/2019	1/31/2019	1/15/2019	20.00%	\$600.00	DOE	5.00%	\$30.00	DHHS	15.00%	\$90.00	Quarterly General Liability and Worker's Comp Policy eff 7/1/18 - 7/1/19
Program Operation B	2018	1/1/2019	1/31/2019	1/17/2019	100.00%	\$163.18	DOE	20.00%	\$32.64	DHHS	80.00%	\$130.54	Vehicle Maintenance: Tire Repair and Alignment for Ford F150
					0.00%				\$0.00			\$0.00	
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Denied/Deferred Units

Client Name	Address	Date of Denial	Reason for Denial/Deferral
Jane Doe	2415 Quail Drive, Baton Rouge, LA 70808	1/3/2019	Roof Damage beyond the Scope of Weatherization

Salaries Included

Employee Name	Title	Budget Types
Lauren Holmes	Housing Deputy Administrator	Admin - 40 hours, T&TA - 5 hours



LA WEATHERIZATION VEHICLE AND EQUIPMENT GUIDELINES**I. Vehicles and Equipment Purchases \$5000 and Over**

The regulations and guidance that include the requirement for approval for purchase of vehicles and equipment greater than \$5,000 are as follows: (10 CFR Part 440, 2 CFR 200, and Weatherization Program Notices 17-6).

For approval of Vehicle & Capital Equipment Purchases, the following must be provided for DOE review:

- Name of requesting Grantee and Local Agency
- Where the vehicle [or other equipment] will be used and how it will be used – Specify, full or part time use in the Weatherization Program
- A statement of whether this is a replacement or an expansion for ramp-up. If this is a replacement, how is the trade-in being addressed?
- Brief description of how the procurement will be done and confirmation that Agency, State and Federal procurement guidelines will be met or have been met:
 - 2 CFR 225 (former OMB Circular A-87) – Cost Principles for State, Local, and Indian Tribal Governments
 - 2 CFR 230 (former OMB Circular A-122) – Cost Principles for Non-Profit Organizations
- What the funding source(s) will be [i.e., include the grant number – not just the title “ARRA Funds,” and also state the budget category (meaning the column in the weatherization budget on attachment A) that will be charged, such as Vehicles & Equipment, Program Operations, Administration, etc.] Subgrantee T&TA funds are not an allowable option for vehicle purchases.
- Copies of bid specification sheet (vehicle or equipment) that includes a description with options requested and bids received.
- A statement that the lowest bid will be selected, or a sufficient justification of the “best value selection” if lowest bid is not recommended for LHC approval. An official request and cover letter must be sent via US Mail or e-mail along with required back-up information.

If a Subgrantee submits the above information via e-mail, the LHC representative should approve the request within 7 business days; pending all of the minimum information is adequately provided. If extenuating circumstances arise, the LHC representative will follow-up within 7 business days, requesting additional details on the purchase.

Subgrantees should consider and weigh the options on leasing versus purchasing. DOE would not need to approve a vehicle lease that does not include a “purchase option.” But if a lease-purchase option is proposed and even if the purchase price is as small as one dollar, DOE would need to approve the purchase of the vehicle.

Once approved, LHC will forward the signed request and all required documentation to DOE for written approval. Upon DOE approval, LHC will send copies of all approvals to the Subgrantee to proceed with the purchase or lease. If additional information is required, LHC will request the information from Subgrantee. The Subgrantee must supply the information within 3 business days. If denied, the Subgrantee cannot proceed with the vehicle/equipment purchase or lease.

II. Vehicles and Equipment Purchases \$3000 - \$4999

The same procedure will be followed for vehicle and equipment purchases \$3000 - \$4999 as for vehicle and equipment purchases \$5000 and above; however, DOE approval is not required only LHC.

This is a synopsis of the vehicle and/or capital equipment purchase requirements. Subgrantees must refer to purchase and procurement procedures in 10 CFR 440, 2 CFR 200, all WPNS, and all other guidance to ensure all federal and state requirements have been met.¹

¹ Source: WPNS 09-1B, 10-1, 11-1, 17-6, OMB Circulars, 10 CFR 440, 2 CFR 200, 2 CFR 225, and 2 CFR 230.



**LA Weatherization Assistance Program
Vehicle and Equipment Purchase Request Form**

*The Louisiana Housing Corporation (LHC) and the U.S. Department of Energy (DOE) must provide prior written approval for the purchase of vehicles and equipment with a purchase price of \$5000.00 or greater. Subgrantee vehicle purchases may **not** be completed with T/TA funds.*

1. Agency Name: _____

2. Agency Contact Person and Number: _____

3. Grant Number (FAIN) and Federal Participation Percentage: _____

4. Vehicles and Equipment Purchase

Description (Year, Make, Model/Manufacturer, Model)	Serial # or VIN # (If Identified)	Purpose (Replacement, Expansion)



Purchase Price <i>(include sales tax, License, Registration fees if applicable)</i>	Procurement Process <i>(Attach documentation of advertisement, bid spec sheet and bid prices/price quotes)</i>	Fund Source <i>(Prog. Ops., Veh./Equip., etc.)</i>

Trade-in/ Disposal Item <i>(Year, Make, Model Required if Replacement)</i>	Trade-in/Disposal Process <i>(Junked, private sale, etc.)</i>	Trade-in Disposal Condition/Value



5. Purchase Justification: Explain why the item(s) is needed, the item’s purpose, percentage use, and who will be using the item(s).

6. Bid Summary: Actual bid or price quote documentation must be submitted with request. Attach additional pages if necessary.

a. Number of bid proposals sent to vendors:

b. Number of bid proposals received:

Vendor (a minimum of 3 Vendors must be listed; attach supporting docs.)	Location	Bid/Price Quote (list lowest to highest bid including rebates)	Date of Bid/Quote



7. Was lowest bid accepted? Yes No

If vendor selected was not the lowest bidder, then provide a detailed justification for your decision. Attach additional pages if necessary.

The agency representative signature below certifies that the agency has followed proper procurement standards as outlined in WPN 17-6, 10 CFR 440, 2 CFR 200, 2 CFR 225, 2 CFR 230 and all other federal regulations. All supporting documentation must be attached and submitted with form.

Signature _____ Date: _____
WAP Coordinator/WAP Manager

Signature _____ Date: _____
Subgrantee Executive Director

Signature _____ Date: _____
LHC WAP Program Manager/Administrator

Signature _____ Date: _____
DOE Authorized Representative