

## ARPA FAQ

- Can WAP and ARPA funding be used on the same project?
  - No. For the purposes of providing ARPA funds to previously weatherized WAP projects, the 15-year re-weatherization rule applies and only traditional WAP projects from 2006 or earlier can be considered for ARPA as there were blended contract funds (DOE & HEAP money) invested in the project. ARRA projects however, (which received 100% DOE funds) would be eligible ARPA projects, as they would be receiving only HEAP funded measures.
- Will taxes need to be paid and up to date for eligibility?
  - Eligibility for ARPA assistance must be determined based on household income: same thresholds as WAP.
- Will there be a state procurement process to assist with supply chain issues?
  - No. However subgrantees can work with the NYSERDA Clean Heat contractors list to ensure working with contractors who are navigating supply chain challenges successfully.
- Can historic properties be eligible for the program?
  - Yes. Subgrantees are responsible for evaluating each building selected for ARPA services for potential impact on historic resources per Section 106 of the National Historic Preservation Act (NHPA), and for referring buildings that may be covered under this Act to the NY State Historic Preservation Office (SHPO). Reviews must be complete before work commences. Due to the tight timeline for planning and construction, for potential ARPA projects that are historic properties, or identified to be in historic districts, subgrantees should consider the impacts of proposed ARPA measures on those properties that may delay or not receive SHPO approval.
- Can ARPA dollars be used for vehicles?
  - No.
- Can ARPA dollars be used for equipment?
  - If the subgrantee can provide a reasonable cost calculation for the portion of the lifecycle of the equipment that will be used during the ARPA program, then a portion of ARPA funds can go towards those costs.
- Can ARPA dollars be used for materials?
  - Yes, so long as the materials are installed on an ARPA project, then ARPA can be charged for the purchase price.
- How will Program determine allocation and project selection?
  - ARPA program funds will be allocated based on subgrantee applications and per project feasibility scores.

- Will solar thermal and solar PV be permitted?
  - Yes, however all projects are subject to a work plan feasibility review by staff.
- Will ground source heat pumps be permitted?
  - Yes, however all projects are subject to a work plan feasibility review by staff.
- Will mini split and heat pumps that provide cooling and heating be permitted?
  - Yes.
- Can ARPA funds be layered with NYSERDA funds?
  - Yes. ARPA is an excellent program candidate to be layered with several NYSERDA programs, including Empower.
- What is the size limit for multifamilies?
  - Multifamily buildings should be less than seven stories and a maximum of 100 units unless the case can be made why a unique situation exists with a particular building.
- Can geothermal be considered?
  - Yes, however all projects are subject to a workplan feasibility review.
- Will battery storage for renewables be an allowable program expense?
  - Yes, however all projects are subject to a workplan feasibility review.
- For a building to be considered for total electrification, will that entire building have to meet state and local energy codes?
  - Yes, all projects must receive final inspection and be code compliant.
- Are deferrals good candidates for ARPA?
  - Yes, these projects would be ideal candidates for the electrification ready/health and safety scope based on a reasonable work plan.
- Are subgrantees that cover multiple counties required to produce 2-3 single family units per county?
  - o No. Subgrantees that cover multiple counties will be asked to produce no less than 2 single family units for their geographic area
- Will there be a penalty to subgrantees who do not participate in the program?
  - No. We encourage and hope for all subgrantees to participate. This program is a pilot of how the state anticipates running future programs including, but not limited to the infrastructure funding. Subgrantees who participate in ARPA will be better able to seamlessly transition to future programs.
- Will ARPA have the same eligibility requirements as WAP?
  - Yes. Generally, ARPA will follow WAP guidelines except as clearly stated in written guidance for cost reasonableness metrics.

- Will ARPA have SIR or max unit costs?
  - No. Generally, ARPA will follow WAP guidelines for eligibility, application, and contract matters. However, feasibility and prioritization metrics will be distinct to ARPA and based on energy efficiency.
  
- Is there a set amount of the advance that will be released to be for labor and materials?
  - Program will release approximately 15% of the total budget for ARPA start-up costs, including labor and materials up front for subgrantees to jumpstart the work.
  
- Will ASHRAE 62.2 be required?
  - ASHRAE 62.2 will not be required. However, ventilation issues found during building assessment should be corrected. IAQ (Indoor Air Quality) must be addressed/considered as part of the ARPA workscope, but standard WAP blower door measurements would not be a required requirement to pass final inspection; ASHRAE calculator can be used to guide what ventilation needs might be relative post air sealing.
  
- Will an energy audit be required?
  - The ARPA program will not require an energy audit. However, program advises an energy assessment in the absence of an audit. Program will reimburse Audits are a reimbursable expense if when they are conducted.
  
- Is ARPA funding governed by Davis Bacon?
  - No, ARPA has received a waiver from Davis Bacon requirements. Davis Bacon only applies to acquisition and new construction projects.
  
- Is MWBE required?
  - All subgrantees will have to report to the Office of Fair Housing, like traditional weatherization as with WAP rules.
  
- Can ARPA funds be used in a mixed-use building to benefit commercial tenants?
  - No, ARPA funds shouldn't be used for commercial tenants. The building can be done with ARPA funds, but the benefit must be to the renters.
  
- Will the removal of asbestos and vermiculite be an eligible expense?
  - Yes. ARPA funds will cover the removal of asbestos and vermiculite and, but the proposed work will be subject to a cost reasonableness review by program.
  
- Can a heat pump DHW replace conventional Natural Gas DHW storage?
  - A heat pump may replace natural gas only if it the existing appliance is inefficient and beyond its useful service life.
  
- Will roof repair be permitted to support solar?
  - Yes, and would be subject to a cost reasonableness review.
  
- When installing heat pump systems for heat, do existing oil/gas systems need to be decommissioned?

- Decommissioning is not required; however, it is an eligible cost. However, subgrantees should check local laws and ordinances to determine if there is a local decommissioning requirement.
- Are emergency generators covered as eligible expenses?
  - No, generators will not be an eligible scope item for the ARPA program.
- Will the HUD lead paint full-abatement rule for over \$25k investment apply for any ARPA work?
  - The \$25K rule will only apply to properties that were brought into the service of affordable housing prior to 1978.
- Most of these projects are going to require permits. Will the final CO need to be obtained for the project to be billed for in September for reimbursement?
  - No. CO will not be required for project completion. However, project sign-off, like current WAP rules, will be required.
- What is the maximum ARPA award that HCR will consider?
  - There is no maximum award. Allocations will be weighted on a feasibility scale.
- Will we be using the usual ESB formulas to create our ARPA budget?
  - The ARPA budget will be entered in the subgrantee database and have the majority most of the same categories. However, administration, capital expenses, etc. and vehicle costs will not be eligible.
- Are there safeguards for subgrantees that act in good faith to complete projects but due to unforeseen delays (such as potential covid shutdowns) cannot complete the project by the deadline? Will agencies be asked to reimburse In-Progress costs if a unit cannot be certified?
  - Subgrantees will provide monthly reporting on overall project status and completion outlook. This will enable program to adjust funding as necessary. Subgrantees will be reimbursed for work completed, however work that cannot be completed by the September 30, 2022, deadline will not have the opportunity for additional funding after the program closes.
- How will federally approved ICR rates be handled in this funding-will it be allowable at the existing approved rate or be capped at the HCR stated rate? Is this state or federal funding, and if combo, what is the breakdown?
  - Since this is a federally funded program indirect costs can be charged at the agency's indirect cost rate. ARPA is 100% federally funded through the HEAP program.
- Are owner contributions waived for rental buildings?
  - Owner contributions are encouraged, but not required.
- Please confirm whether previous ARRA funded projects can be considered?
  - ARRA projects are ideal pipeline candidates for ARPA.
- Will administration be part of program support?

- Administration is not an eligible cost. However, subgrantees will be reimbursed for ‘the cost to deliver the program’. Expenses generally associated with administration should be built into the proposed cost of each project.
- Will ARPA cover insulation measures that WAP typically covered since the home cannot double dip?
  - Yes, air sealing and insulation are eligible and essential scope items for ARPA. Subgrantees are expected to weatherize the home as part of the workscope.
- Confirm please if contracts can be amended?
  - Contracts can be amended. Program will identify a period in the summer for a one-time contract amendment based on project completion.
- To whom do we submit all our documentation and contracts to?
  - Documentation, Applications, and Contracts should be submitted to your field rep and/or regional supervisor.
- Is a database export part of the ARPA budget proposal?
  - Yes.
- Is household eligibility the same as WAP?
  - Yes.
- How do we handle procurement if we have difficulty finding contractors to bid on projects? Do we need fiscal approval if we have fewer than 3 bids per wrap procurement guidelines?
  - Federal procurement rules apply to ARPA. Subgrantees should submit a Prior Approval Request for bids that don’t meet federal standards.
- Will group homes and/or shelters be allowed to receive ARPA funds?
  - Yes??Yes, but all proposals are subject to HCR review and approval. Subgrantees’ proposals should consider if work can be completed in the stated timeframe.
- Is overtime pay allowed?
  - Budgeted salary is a reimbursable expense. Overtime pay is determined by subgrantee policy, not HCR.
- Is there currently a list of approved contractors specifically for the electrification solutions we’re looking at?
  - The NYSERDA Clean Heat Providers list is recommended.
- Will there be MWBE requirements?
  - No. The same MWBE reporting requirements as in WAP must be followed for ARPA. MWBE can be considered in procurement but should not cause delay in choosing winning bids.
- What assistance can we expect for specs and spec writing since we have very limited experience?

- NYSWDA and AEA will support spec writing.
- If a building we select for ARPA falls thru, would we be allowed to find a replacement building?
  - Yes.
- If an agency owned and rents apartments to tenants, are those apartments eligible?
  - Yes, so long as they meet income eligibility guidelines.
- Do ARPA projects requires subgrantee QCI inspections?
  - Yes????No, the QCI standard will not be required. However, a complete final inspection is required of all completed work.
- We have potential ARPA projects lined up, however we have seen some resistance from clients allowing us to remove fossil fuel appliances?
  - Removing appliances is not required, unless required by local code or ordinance.