



Weatherization Health & Safety Plan – 2021

Weatherization Grantee Health and Safety (H&S) Plan *Optional Template*

1.0 – GENERAL INFORMATION

Additional information that does not fit neatly in one of the other sections of this document.

Enter Additional H&S Information Here

2.0 – BUDGETING

Grantees are encouraged to budget H&S costs as a separate category and, thereby, exclude such costs from the Average Cost Per Unit (ACPU) cost limitation. This separate category also allows these costs to be isolated from energy efficiency costs in program evaluations. H&S costs that are budgeted and reported under the Program Operations category rather than the H&S category, the related H&S costs must be included in the calculation of the ACPU and cost-justified through the Grantee's Department of Energy (DOE)-approved energy audit tool.

Select which option used below.

Separate H&S Budget ☒

Contained in Program Operations ☐

3.0 – H&S EXPENDITURE LIMITS

Pursuant to [10 CFR 440.16\(h\)](#), Grantees must establish H&S expenditure limits for their Program and provide justification for those limits by explaining the basis and related historical H&S expenditures. DOE acknowledges that it may be necessary for Grantees to deviate from historical expenditures when certain circumstances arise (e.g. funding source changes).

[10 CFR 440.16\(h\)\(2\)](#) dictates that these limits must be expressed as a percentage of the ACPU. To calculate this percentage use the following formula:

$$\text{Total Average H\&S Cost per Unit} = \frac{\text{H\&S budget amount}}{\text{Program Operations budget amount}}$$

For example, if the ACPU is \$5,000 and a Grantee's Program expends an average of \$750 per dwelling on energy-related H&S measures, the Total Average H&S Cost per Unit would equal 15 percent. DOE acknowledges that this percentage may vary significantly between Grantees due to different geographical areas and depending upon the availability of other funding sources, resource availability, etc. Low percentages should include a statement of what other funding supports H&S costs, while larger percentages will require greater justification and relevant historical support.

15 percent is not a maximum limit on H&S expenditures. DOE will conduct a secondary level of review on H&S Plans with a Grantee request of more than 15 percent of Program Operations used for H&S purposes. **DOE strongly encourages using the table below in developing justification for the requested H&S budget amount.** In accordance with [10 CFR 440.18\(d\)\(15\)](#), these funds are to be expended by the Program in direct weatherization activities, "of which is necessary before, or because of, installation of weatherization materials." This same section of the regulation excludes the H&S costs from the ACPU limitation if H&S costs are budgeted separately.

DOE recommends reviewing recent budget requests and compare those to actual H&S expenditures to see if previous budget estimates have been accurate. The resulting Total Average H&S Cost per Unit multiplied by the Grantee's production estimate in the Annual File should correlate to the H&S budget amount listed in the Grantee's annual plan.

H&S expenditure limits and justification explaining the basis for setting the limits.

Subgrantees may use funds to abate energy-related health and safety hazards only if elimination of such hazards are necessary before, or as a result of, installation of weatherization materials.

2021-2022 Program Year Limits: Related Health and Safety expenditures are limited to 15% of the state's total program operations budget. Subgrantees will be required to obtain prior written approval from GEFA for all health and safety repairs to individual units exceeding \$1,164.74

Expenses charged as health and safety measures, do not require cost justification (meeting SIR \geq 1) and are not to be included as part of the overall job average.

The last full year of Health and Safety reported shows GA spent 97.7% of allocated Health and Safety funds.

Utilizing the spreadsheet embedded below, provide a full list of H&S measures using historical data from your program, including average cost, and frequency rate. If installing more than a single instance of one measure in a unit (e.g. multiple CO alarms), Grantees may aggregate costs so that frequency does not exceed 100%, or enter a justification into the measure column, which explains why that measure has a frequency rate of over 100%. The spreadsheet will auto calculate your expected Total Average H&S Cost per Unit.

Instructions: Double-click icon directly below to open, view and edit Measure Matrix Spreadsheet. Complete the spreadsheet by entering the required information. To save, close the spreadsheet and it will save to this document.



Measure Matrix
Final.xlsx

4.0 – INCIDENTAL REPAIR MEASURES

Any measures that could potentially be identified as H&S but the Grantee chooses to instead identify and treat those measures as incidental repair measures (IRMs), must be implemented consistently throughout the Grantee's weatherization program. The measure must fit the regulatory definition of an IRM and be cost justified along with the associated energy conservation measure and/or package of measures. [10 CFR 440.3](#) defines Incidental Repairs as, "those repairs necessary for the effective performance or preservation of weatherization materials."

H&S measures identified and treated as IRMs within your Program.

Such repairs include, but are not limited to framing or repairing windows and doors which could not otherwise be caulked or weather-stripped; providing protective materials, such as paint, used to seal materials installed under this program; sealing minor roof leaks to preserve new attic insulation; repairing water-damaged flooring as part of replacing a water heater; etc.

While repair to a roof to protect the insulation to be installed is allowable, expanding this definition to include roof replacement or for other non-energy related repairs is not a permissible use of DOE funds. If the roof needs replacing the unit should either be referred to a rehabilitation program or the subgrantee must use other funds to cover the costs for this type of work. Roofing repairs are to be charged as incidental repairs and must be included and cost justified in the improvement package of the project.

Incidental repairs must not exceed 10% of the DOE allowable average cost per unit and must be cost justified in the improvement package of the project in accordance with WPN 12-9.

5.0 – OCCUPANT PRE-EXISTING OR POTENTIAL HEALTH CONDITIONS AND HAZARD IDENTIFICATION AND NOTIFICATION FORM(S)

Grantees must include policies/procedures for informing clients of the aspects of weatherization that may put a client with pre-existing health conditions at risk during installation of measures. This screening may occur as part of the initial application for weatherization and/or during the energy audit. Procedures must include what steps will be taken and/or available to the client to ensure that weatherization work will not aggravate pre-existing health conditions. Additionally H&S assessments are required to identify hazards in the home. For those hazards identified, appropriate testing is required when applicable. The client/landlord/property manager must be informed in writing of all testing results, including identification of a hazards revealed by the testing that will lead to deferral/referral.

Grantees are required to develop documentation forms that include at a minimum:

- *Occupant Pre-existing or Potential Health Conditions;*
 - *Screen occupant(s) to self-report known or suspected health concerns either as part of initial application for weatherization, during the energy audit, or other parts of the weatherization process as specified;*
 - *Inform client in writing of any known risks; and*
 - *Provide client with Subgrantee point of contact information in writing so client can inform of any issues.*
- *Hazard Identification Notification Form*
 - *The occupant(s) (and Landlord's, if applicable) name and address;*
 - *Date(s) of the energy audit/assessment and when the occupant(s) (and Landlord, if applicable) was informed of a potential H&S issue;*
 - *A clear description of the problem;*
 - *A statement indicating if, or when weatherization could continue; and*
 - *The occupant(s) (and Landlord's, if applicable) signature(s) indicating that they understand and have been informed of their rights and options.*

Procedure for soliciting occupants' health and safety concerns related to components of their homes

Georgia requires all agencies to review with and have client sign a Radon Informed Consent form, Notice of Hazardous Materials Warning form, Weatherization Mold Inspection and Disclaimer Form, and LEAD Pre-Renovation form. Additionally, GEFA has updated the client application form to include a section to solicit the occupants' health conditions, which may be exacerbated by weatherization work.

Procedure for determining whether occupants suffer from health conditions which may be negatively impacted by the act of weatherizing their dwelling

As part of the initial application for weatherization, occupants shall be required to reveal any known or suspected health concerns. Occupants shall be screened again during the audit. During the audit process subgrantees should take all reasonable precautions by visually documenting (taking pictures of) the presence of mold, lead, asbestos or any toxic or potentially toxic conditions. Workers shall provide client information regarding any known risks. The client should be informed throughout this entire process of any issues or concerns discovered during the initial audit along with an explanation that weatherization would be inappropriate, or that the weatherization work scope must be modified or changed. The subgrantee must document its concerns in writing along with pictures and other relevant information and secure them in the client file. Traditional weatherization approaches may need to be modified, delayed or eliminated to ensure that unintended consequences are prevented. Workers shall provide client with worker contact information so client can inform the workers of any issues.

Procedure for addressing potential health concerns including pre-existing health conditions when they are identified

- Identify and document existing and potential Health and Safety hazards that could be affected by weatherization activities.
- For each identified existing and potential hazard, determine whether it is an allowed WAP activity and within the resource limitations of the program.
- Identify whether the hazard should be mitigated before, during or after weatherization activities.
- Identify who is responsible for addressing each Health and Safety hazard (i.e., Subgrantee, the dwelling owner or client).
- Determine whether to go forward with weatherization, defer weatherization until the hazard is mitigated, or to walk away entirely.
- Provide written notification of the Health and Safety hazards to the owner/landlord in rental dwellings and to the client in both rental and owner-occupied dwellings. Include all information relevant to the hazard.
 - Document the results of all hazard mitigation activities.

Documentation Form(s) have been included for review?	
Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Location where forms have been uploaded/submitted	
Separate attachment to SF424 <input checked="" type="checkbox"/>	Separate attachment to H&S Plan <input type="checkbox"/>

6.0 – HEALTH AND SAFETY CATEGORIES

For each of the following H&S categories identified by DOE:

- Explain whether you concur with existing guidance from Weatherization Program Notice (WPN) 17-7 and how that guidance will be implemented in your Program, if you are proposing an alternative action/allowability, or if the identified category will not be addressed and will always result in deferral. Alternatives require comprehensive explanations as to how it meets the intent of DOE guidance.
- Where an action/allowability or testing is “required” or “not allowed” through WPN 17-7, Grantees must concur, or choose to defer all units where the specific category is encountered.
- Any activities that are marked as deferral/referrals must contain the H&S reasons specified within the Master File Section V.1.2 Box 5 Deferral/Referral.
- Unless an alternate funding source(s) is declared, utilize DOE funds to address the particular category.
- Describe the explicit methods to address the specific category.
- Describe in detail what testing protocols (if any) used to assess the particular category.
- Define and quantify minimum thresholds that determine minor, major, and limited definitions and the criteria used to make a determination on a case-by-case basis.
- Define “at-risk” occupant(s) and identify minimum documentation requirements for them.
- Client Education activities specific to H&S reasons is required within the Master File Section V.8.4 Training and Technical Assistance of the annual application.
- Training activities specific to H&S reasons is required within the Master File Section V.8.4 Training and Technical Assistance of the annual application.

6.1 – Air Conditioning and Heating Systems

Concurrence, Alternative or Deferral

Concurrence with DOE Guidance ☒ Alternative Guidance ☐ Results in Deferral/Referral ☐

Air Conditioning Unallowable with DOE Funds ☐ Heating Unallowable with DOE Funds ☐

Other Funding Source Addresses H&S Issue ☐ Enter Funding Source

Procedure for unsafe or non-functioning primary heating/cooling systems

Primary “red tagged”, inoperable, or nonexistent heating system replacement, repair, or installation is allowed where climate conditions warrant, unless prevented by other guidance herein.

Primary cooling system replacement, repair, or installation is allowed only in homes of at-risk occupants where climate conditions warrant.

Primary systems are most relied upon to provide heating/cooling throughout the home. Secondary systems are employed only in extreme conditions.

An attempt to cost-justify the measure must be made via the DOE approved audit tool prior to replacing/repairing with health and safety funds.

Procedure for unsafe or non-functioning secondary heating systems, including unvented secondary space heaters

If unvented combustion space heaters are present in a home, they must be removed, except as secondary heat where the unit conforms to ANSI Z21.11.2.

Definition of and documentation required for “at-risk” occupants

An at-risk occupant is defined as a person/household meeting one or more of the following conditions: an elderly person (65 years or older); a person with health condition(s) that would be exacerbated by exposure to low temperature conditions; a person who is pregnant; a household containing an infant(s) (2 years or less).

Testing protocols

Testing for air-free CO levels should be performed and documented. Units left in home should be checked for labels which ensure conformity to ANSI Z21.11.2.

6.2 – Asbestos (Confirmed and/or Presumed Asbestos Containing Material)

Concurrence, Alternative or Deferral

Concurrence with DOE Guidance ☒ Alternative Guidance ☐ Results in Deferral/Referral ☐

Unallowable Measure with DOE Funding ☐ Other Funding Source Addresses H&S Issue ☐ Enter Funding Source

Asbestos on Heating, Ventilation and Air Conditioning (HVAC) systems, distribution, venting and other small surfaces that will be disturbed through the course of weatherization work policy

Assume asbestos is present in covering materials. Encapsulation is allowed by an AHERA asbestos control professional and should be conducted prior to blower door testing. Removal may be allowed by an AHERA asbestos control professional based on the situation as determined by the inspector or subgrantee representative.

Asbestos in attics, walls, floors roofs and foundations that will be disturbed through the course of weatherization work policy

All precautions must be taken not to damage asbestos-containing surfaces. Asbestos siding and any asbestos containing surfaces such as walls, floors, roofs and foundation should never be cut or drilled.

Vermiculite that will be disturbed through the course of weatherization work policy

When vermiculite is present, unless testing determines otherwise, take precautionary measures as if it contains asbestos, such as not using blower door tests and utilizing personal air monitoring while in attics. Where blower door tests are performed, it is a best practice to perform pressurization instead of depressurization. Encapsulation by an appropriately trained asbestos control professional is allowed. Removal is not allowed.

Blower door testing policy when asbestos/vermiculite is present

When friable asbestos containing materials are found or suspected present, no blower door testing should be performed

Testing protocols

If a home contains asbestos containing materials but does not contain friable asbestos or vermiculite, then the recommended best practice is to use the blower door to pressurize instead of depressurizing the home.

Documentation requirements

If asbestos containing materials or suspected documentation will be provided to the client regarding potential health and safety concerns, location of those surfaces where asbestos has been identified, and how precautions will be taken. All documentation shall be signed by the client and maintained in the client file.

6.3 – Biologicals and Unsanitary Conditions

(e.g., odors, mustiness, bacteria, viruses, raw sewage, rotting wood)

Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance ☒ Alternative Guidance ☐ Results in Deferral/Referral ☐

Unallowable Measure with DOE Funding ☐ Other Funding Source Addresses H&S Issue ☐ Enter Funding Source

Biological and unsanitary conditions in dwellings policy

Remediation of conditions that may lead to or promote biological concerns and unsanitary conditions is allowed. Addressing bacteria and viruses is not an allowable cost. Deferral may be necessary in cases where a known agent is present in the home that may create a serious risk to occupants or weatherization workers.

Testing protocols

Training will be provided using T&TA monies to teach auditors and workers how to recognize biological and unsanitary conditions and when to defer. Training will also focus on worker safety when coming in contact with these conditions.

6.4 – Building Structure and Roofing (e.g., roofing, wall, foundation)

Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance ☒ Alternative Guidance ☐ Results in Deferral/Referral ☐
 Unallowable Measure with DOE Funding ☐ Other Funding Source Addresses H&S Issue ☐ Enter Funding Source

Structural issues in dwellings policy

Building rehabilitation is beyond the scope of the Weatherization Assistance Program.

Define and quantify minor or allowable structure and roofing issues. At what point are these considered beyond the scope of weatherization?

Homes with conditions that require more than incidental repair should be deferred. See Mold and Moisture, Code Compliance and Pests guidance below.

If priority lists are used and these repairs are designated as IRMs, at what point is a site-specific electronic energy audit required?

N/A

6.5 – Code Compliance

Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance ☒ Alternative Guidance ☐ Results in Deferral/Referral ☐
 Unallowable Measure with DOE Funding ☐ Other Funding Source Addresses H&S Issue ☐ Enter Funding Source

Code compliance issues in dwellings policy

Correction of preexisting code compliance issues is not an allowable cost other than where weatherization measures are being conducted. State and local (or jurisdiction having authority) codes must be followed while installing weatherization measures. Condemned properties and properties where “red tagged” health and safety conditions exist that cannot be corrected under this guidance should be deferred.

6.6 – Combustion Gases

Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance ☒ Alternative Guidance ☐ Results in Deferral/Referral ☐
 Unallowable Measure with DOE Funding ☐ Other Funding Source Addresses H&S Issue ☐ Enter Funding Source

Combustion gas issues discovered during testing, including those that require an immediate response policy

Proper venting to the outside for combustion appliances, including gas dryers, refrigerators, furnaces, vented space heaters and water heaters is required. Correction of venting is allowed when testing indicates a problem. If unsafe conditions whose remediation is necessary to perform weatherization cannot be remedied by repair or tuning, replacement is an allowable health and safety measure.

Testing protocols

- Combustion safety testing is required on all combustion appliances located in or adjacent to the living space – this includes heating systems, water heaters, dryers, ovens, cooktops. Venting of combustion appliances will be inspected to confirm proper functionality, code compliance, and confirm adequate clearances. All naturally drafting appliances will be tested for spillage under worst case conditions before and after air tightening and at the end of every day while weatherization work is underway. Cooking burners will be tested for operability and flame quality. Ovens will be tested to confirm CO levels are within acceptable limits.
- If combustion appliances are found to be failing spillage, appropriate action must be taken to alleviate the issue. Potential solutions include but are not limited to: eliminating pressure imbalances causing the excessive depressurization of the CAZ, isolating the appliance from the living space, repairing or replacing the flue/chimney, replacing the system (with the exceptions of ovens and ranges which may not be replaced with DOE funds).
- Combustion appliances experiencing CO levels higher than acceptable limits require a Clean-and-Tune by licensed HVAC professional, followed by additional CAZ testing to verify CO has been brought within acceptable limits.
- Kitchen vent hoods should be installed in homes where a gas cooktop exists, and no exhaust ventilation is present.
 - A Carbon Monoxide detector must be installed per ASHRAE 62.2 2016.

6.7 – Electrical

Concurrence, Alternative or Deferral/Referral		
Concurrence with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
Unallowable Measure with DOE Funding <input type="checkbox"/> Other Funding Source Addresses H&S Issue <input type="checkbox"/> Enter Funding Source		
Electrical hazards, including knob & tube wiring, in dwellings policy		
Minor electrical repairs are allowed where health or safety of the occupant is at risk. Upgrades and repairs are allowed when necessary to perform specific weatherization measures. Evaluate and if necessary, provide sufficient over-current protection and damming (if required) prior to insulating building components containing knob and tube wiring, as required by AHJ.		
Define and quantify minor electrical issues. At what point are these considered beyond the scope of weatherization?		
<p>Minor electrical repairs or upgrades of energy related health and safety are allowable up to \$1,000 dollars. When necessary for the installation of an ECM(s) DOE funds may also be used to cover the cost of electrical inspections by a licensed electrician in order to verify proper electrical wiring and electrical wiring loads.</p> <p>Major electrical repairs or upgrades in excess of \$1,000 dollars are beyond the scope of DOE WAP and may be cause for deferral. Agencies should always seek to be aware of additional funds or services for electrical upgrades and/or repairs providing information on all such options to the client.</p>		
If priority lists are used and these repairs are designated as IRMs, at what point is a site-specific electronic energy audit required?		
N/A		

6.8 – Formaldehyde, Volatile Organic Compounds (VOCs), Flammable Liquids, and other Air Pollutants

Concurrence, Alternative or Deferral/Referral		
Concurrence with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
Unallowable Measure with DOE Funding <input type="checkbox"/> Other Funding Source Addresses H&S Issue <input type="checkbox"/> Enter Funding Source		
Formaldehyde, VOCs, flammable liquids and other air pollutants in dwellings policy		
Removal of pollutants is allowed and is required if they pose a risk to workers. If pollutants pose a risk to workers and removal cannot be performed or is not allowed by the client, the unit must be deferred. Refer to <i>Hazardous Materials Disposal</i> section for more information.		
Testing protocols		
Sensory inspection will be performed to identify presence of pollutants in the home. If identified, pollutants should be removed from the home prior to beginning weatherization work, so long as by doing so no risk is presented to workers or occupants.		

6.9 – Fuel Leaks (please indicate specific fuel type if policy differs by type)

Concurrence, Alternative or Deferral/Referral		
Concurrence with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
Unallowable Measure <input type="checkbox"/>		
Fuel leak remediation protocols		
When a minor gas leak is found on the utility side of service, the utility service must be contacted before work may proceed. Notify the utility and halt work if a leak is discovered during weatherization. Fuel leaks that are major (exceeding the health and safety limit) are the responsibility of the client (vs. the utility) and must be repaired before weatherizing a unit.		
At what point are fuel leaks considered beyond the scope of weatherization?		
Fuel leaks that are major (exceeding the health and safety limit) are the responsibility of the client (vs. the utility) and must be repaired before weatherizing a unit.		
Testing protocols		
Test all accessible gas lines to include internal gas components inside combustion appliances. Test exposed gas lines for fuel leaks from utility coupling into and throughout, the home. Conduct sensory inspection on bulk fuels to determine if leak exists.		

6.10 – Gas Range/Ovens

Concurrence, Alternative or Deferral/Referral		
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Concurrence with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
Unallowable Measure with DOE Funding <input type="checkbox"/> Other Funding Source Addresses H&S Issue <input type="checkbox"/> Enter Funding Source		
Unsafe gas range/ovens policy		
When testing indicates a problem, entities may perform standard maintenance on or repair gas cooktops and ovens. Replacement of ovens and ranges is not allowed.		
Testing protocols		
Test gas ovens for CO. Inspect cooking burners and ovens for operability and flame quality.		

6.11 – Hazardous Materials Disposal [e.g., Lead, Refrigerant, Asbestos, Mercury (including CFLs/fluorescents), etc.] (please indicate where policy differs by material)

Concurrence, Alternative or Deferral/Referral		
Concurrence with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
Unallowable Measure with DOE Funding <input type="checkbox"/> Other Funding Source Addresses H&S Issue <input type="checkbox"/> Enter Funding Source		
Hazardous materials disposal policy (existing material/appliance and hazardous material)		
Hazardous Waste Materials generated in the course of weatherization work shall be disposed of according to all local laws, regulations and/or Federal guidelines, as applicable. Document proper disposal requirements in the contract or work order language with responsible party. Reclaim refrigerant per Clean Air Act 1990, section 608, as amended by 40 CFR82, 5/14/93. Refer to <i>Lead</i> and <i>Asbestos</i> sections for more information on these topics.		
Documentation requirements		
In order to perform testing, recharge, and/or reclaim refrigerant, workers must hold EPA-approved section 608 type I or universal certification.		

6.12 – Injury Prevention of Occupants and Weatherization Workers (e.g., repairing stairs and replacing handrails)

Concurrence, Alternative or Deferral/Referral		
Concurrence with DOE Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
Unallowable Measure with DOE Funding <input type="checkbox"/> Other Funding Source Addresses H&S Issue <input type="checkbox"/> Enter Funding Source		
Injury prevention measure(s) policy		
Workers must take all reasonable precautions against performing work on homes that will subject workers or occupants to health and safety risks. When necessary to effectively weatherize a home, workers may make minor repairs and installations. Please refer to <i>Incidental Repair Measures</i> section for more details.		
Define and quantify minor or allowable injury prevention measures. At what point are these considered beyond the scope of weatherization?		
Inspection will be performed to identify whether dangers are present in the home that would prevent weatherization work to proceed or would subject workers or occupants to health and safety risks. If these dangers are minor (see health and safety limits above) they may be corrected, as long as correction is necessary to allow weatherization work to proceed. If these dangers are major or if it is not necessary to repair the dangerous condition to allow weatherization work to proceed, the home should be deferred. The client should be given information on the dangers observed and provided with recommendations and referral information if available.		

6.13 – Lead Based Paint

Concurrence, Alternative or Deferral/Referral		
Concurrence with DOE Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral/Referral <input type="checkbox"/>
Unallowable Measure with DOE Funding <input type="checkbox"/> Other Funding Source Addresses H&S Issue <input type="checkbox"/> Enter Funding Source		
Lead safe work protocols		
Follow EPA's Lead; Renovation, Repair and Painting Program (RRP) when weatherization crews are working in pre-1978 housing. Deferral is required when the extent and condition of lead-based paint in the house would potentially create further health and safety hazards. Only those costs directly associated with the testing and lead safe practices for surfaces directly disturbed during weatherization activities are allowable.		

Testing protocols
Job site testing setup and cleaning verification is required by a Certified Renovator. A copy of the Certified Renovator's report will be in the client file.
Documentation requirements
Documentation in the client file must include Certified Renovator certifications and a description of specific actions taken, testing, photos and site containment set up.

6.14 – Mold and Moisture
(e.g., drainage, gutters, down spouts, extensions, flashing, sump pumps, dehumidifiers, landscape, vapor retarders, moisture barriers)
Concurrence, Alternative or Deferral/Referral
Concurrence with DOE Guidance <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/> Results in Deferral/Referral <input type="checkbox"/>
Unallowable Measure <input type="checkbox"/> Other Funding Source Addresses H&S Issue <input type="checkbox"/> Enter Funding Source
Moisture related issues in dwellings policy
Limited water damage repairs that can be addressed by weatherization workers and correction of moisture and mold creating conditions are allowed when necessary in order to weatherize the home and to ensure the long-term stability and durability of the measures. Source control is allowed when necessary to weatherize the home and to ensure the long-term stability and durability of the measures. Where severe mold and moisture issues cannot be addressed, deferral is required.
Define and quantify minor or allowable moisture-related measures. At what point are these considered beyond the scope of weatherization?
DOE WAP funding may be used to perform water damage repairs and correction of moisture and mold creating conditions when necessary in order to weatherize the home and to ensure the long-term stability and durability of the measures. DOE WAP funds may not be used for mold testing. Where severe mold and moisture issues cannot be addressed, deferral is required.

6.15 – Pests
Concurrence, Alternative or Deferral/Referral
Concurrence with DOE Guidance <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/> Results in Deferral/Referral <input type="checkbox"/>
Unallowable Measure with DOE Funding <input type="checkbox"/> Other Funding Source Addresses H&S Issue <input type="checkbox"/> Enter Funding Source
Pests and pest intrusion prevention policy
Pest removal is allowed only where infestation would prevent weatherization. Infestation of pests may be cause for deferral where it cannot be reasonably removed or poses health and safety concern for workers. Screening of windows and points of access is allowed to prevent intrusion.
Define and quantify pest infestation thresholds. At what point are these considered Beyond the scope of weatherization
DOE WAP funding may be used for pest removal only where infestation would prevent weatherization and for screening of windows and points of access to prevent intrusion.
If infestation of pests poses a health and safety concern for workers or pests cannot be reasonably removed, the issue is beyond the scope of DOE WAP and the home should be deferred. Agencies should always seek to be aware of additional funds or services for pests and should provide information on all applicable options to the client.

6.16 – Radon
Concurrence, Alternative or Deferral/Referral
Concurrence with DOE Guidance <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/> Results in Deferral/Referral <input type="checkbox"/>
Unallowable Measure with DOE Funding <input type="checkbox"/> Other Funding Source Addresses H&S Issue <input type="checkbox"/> Enter Funding Source

Procedure for radon in dwellings
Whenever site conditions permit, exposed dirt should be covered with a 6 mil or greater polyethylene sheeting, lapped at least 12 inches and sealed with appropriate sealant at all seams, walls and penetrations. Other precautions may include sealing any observed floor or foundations penetrations, including open sump pits, isolating the basement from the conditioned space and ensuring crawl space venting is installed.
Testing protocols
Describe In Detail Testing Protocols Here
Documentation requirements
All clients must sign the radon consent form. If client testing reveals high levels (4.0 pc/ml or higher) in a home, subgrantees should provide documentation and information to client regarding the dangers associated with radon and any available references or funding sources to address the issue. If home is suspected or tested to confirm higher than acceptable radon levels, client should be provided with <i>EPA Consumer's Guide to Radon Reduction</i> found here: http://www.epa.gov/radon/pdfs/consquid.pdf . All documentation shall be signed by the client and maintained in the client file.

6.17 – Safety Devices: Smoke and Carbon Monoxide Alarms, Fire Extinguishers

Concurrence, Alternative or Deferral/Referral
Concurrence with DOE Guidance <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/> Results in Deferral/Referral <input type="checkbox"/>
Unallowable Measure with DOE Funding <input type="checkbox"/> Other Funding Source Addresses H&S Issue <input type="checkbox"/> Enter Funding Source
Installation or replacement policy for the following safety devices:
Smoke Alarms: Installation of smoke alarms is allowed where detectors are not present or are inoperable.
Carbon Monoxide Alarms: CO alarms are required to comply with ASHRAE 62.2.2016.
Fire Extinguishers: Providing fire extinguishers is allowed only when solid fuel (such as wood) is present.
Testing protocols
Homes should be inspected to determine if smoke/CO alarms are present and/or operable. If not operable or present, smoke alarms may be installed per local and state codes. If not operable or present, CO alarms must be installed per local and state codes. A fire extinguisher may be provided in homes where primary heat source is wood. The fire extinguisher must be installed according to manufacturer standards and local code in vicinity of the primary heating source.

6.18 – Ventilation and Indoor Air Quality

Concurrence, Alternative or Deferral/Referral
Concurrence with DOE Guidance <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/> Results in Deferral/Referral <input type="checkbox"/>
Version of American Society of Heating Refrigeration and Air-conditioning Engineers (ASHRAE) 62.2 Implemented (optional: identify Addenda used)
ASHRAE 62.2 2016 is required to be met to the fullest extent possible when performing weatherization activities. Implementing ASHRAE 62.2 2016 is not required where acceptable indoor air quality already exists as defined by ASHRAE 62.2.2016
Procedures for complying with implemented ASHRAE standard
Existing fans and blower systems should be updated if not adequate according to ASHRAE 62.2.2016 requirements.
Testing protocols
The following actions are required and must be performed in all homes in regards to ventilation: ASHRAE 62.2.2016 evaluation and calculations before and after weatherization work is performed (including Blower Door testing), pre-weatherization fan flow testing of existing systems, and post-installation fan flow testing of new installations in order to ensure compliance with ASHRAE 62.2.2016.

6.19 – Window Repair, Door Repair

Concurrence, Alternative or Deferral/Referral
Concurrence with DOE Guidance <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/> Results in Deferral/Referral <input type="checkbox"/>
Unallowable Measure with DOE Funding <input type="checkbox"/> Other Funding Source Addresses H&S Issue <input type="checkbox"/> Enter Funding Source
Window repair and door repair H&S policy

Replacement, repair, and/or installation is not an allowable health & safety cost but may be allowed as an incidental repair or an ECM if $SIR \geq 1$. If replacement, repair, and/or installation of windows, doors, or window guards is necessary, it must be determined whether it meets the criteria for incidental repairs. If so, it may be treated as such and addressed. If not, a NEAT or MHEA audit should be performed to determine whether the work meets an $SIR \geq 1$. If so, it may be addressed as an ECM. Otherwise, the home should be deferred.

6.20 – Worker Safety (e.g., OSHA)

Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance ☒ Alternative Guidance ☐ Results in Deferral/Referral ☐

Unallowable Measure with DOE Funding ☐ Other Funding Source Addresses H&S Issue ☐ Enter Funding Source

Federal, state and local worker safety requirements policy

Workers must follow OSHA standards and Safety Data Sheets (SDS) and take precautions to ensure the health and safety of themselves and other workers. SDS must be posted wherever workers may be exposed to hazardous materials.