

# Weatherization Grantee Health and Safety Plan

## Optional Template

### POLICY SUBMITTED WITH PLAN

#### 1.0 – GENERAL INFORMATION

Grantees are encouraged to enter additional information here that does not fit neatly in one of the other sections of this document.

#### 2.0 – BUDGETING

Grantees are encouraged to budget Health & Safety (H&S) costs as a separate category and, thereby, exclude such costs from the average cost per unit cost (ACPU) limitation. This separate category also allows these costs to be isolated from energy efficiency costs in program evaluations. Grantees are reminded that, if H&S costs 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 approved energy audit.

Select which option is used below.

Separate Health and Safety Budget

Contained in Program Operations

#### 3.0 – HEALTH AND SAFETY EXPENDITURE LIMITS

Pursuant to [10 CFR 440.16\(h\)](#), Grantees must set H&S expenditure limits for their Program, providing justification by explaining the basis for setting these limits and providing related historical experience.

Low percentages should include a statement of what other funding is being used to support H&S costs, while larger percentages will require greater justification and relevant historical support. It is possible that these limits may vary depending upon conditions found in different geographical areas. These limits must be expressed as a percentage of the ACPU. For example, if the ACPU is \$5,000, then an average expenditure of \$750 per dwelling would equal 15 percent expenditures for H&S.

15 percent is not a limit on H&S expenditures but exceeding this amount will require ample justification. These funds are to be expended by the Program in direct weatherization activities. While required as a percentage of the ACPU, if budgeted separately, the H&S costs are not calculated into the per-house limitation. DOE strongly encourages using the table below in developing justification for the requested H&S budget amount. Each H&S measure the Grantee anticipates addressing with H&S funds should be listed along with an associated cost for each measure, and by using historical data the estimated frequency that each measure is installed over the total production for the year.

It is also recommended reviewing recent budget requests, versus 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 state plan.

Should a Grantee request to have more than 15 percent of Program Operations used for health and safety purposes, DOE will conduct a secondary level of review. DOE strongly encourages use of this H&S template and matrix to help expedite this process.

## Health & Safety Measures

Health & Safety Measures	Average Cost	Frequency	Subtotal
Heating System Replacement	\$ 8,235.86	5.11%	\$ 420.85
AC for Cool room	\$ 447.10	6.37%	\$ 28.48
CO/Smoke Detector	\$ 185.47	74.20%	\$ 137.62
Electrical Repair	\$ 384.50	9.56%	\$ 36.76
Evaluate Clean & Tune	\$ 324.44	37.87%	\$ 123.09
Fix Improper Venting (Clothes Dryer)	\$ 111.86	77.00%	\$ 86.13
Fix Improper Venting (Wood Stove/Fireplace)	\$ 236.88	7.00%	\$ 16.58
Fix Improper Venting Kitchen Exhaust Fan	\$ 293.16	9.60%	\$ 28.14
Fix Improper Venting of Bathroom Exhaust Fan	\$ 96.65	15.00%	\$ 14.50
Fix Plumbing Leaks	\$ 205.75	24.00%	\$ 49.38
Fix Wiring Problems	\$ 587.36	34.20%	\$ 200.88
Garbage Removal	\$ 101.29	7.56%	\$ 7.66
HVAC Repairs	\$ 392.26	4.99%	\$ 19.57
Install Bathroom Exhaust Fan (ASHRAE)	\$ 830.12	80.50%	\$ 794.03
Install Kitchen Exhaust Fan	\$ 442.89	10.70%	\$ 47.39
Knob & Tube Rewire	\$ 4,491.50	5.78%	\$ 259.61
Pest Control	\$ 432.58	12.00%	\$ 51.91
Practice Lead Safe Weatherization (Walls)	\$ 353.37	14.70%	\$ 51.94
Pressure Relief Piping Needed	\$ 48.74	67.00%	\$ 32.65
Relocate Thermostat	\$ 170.79	2.50%	\$ 4.27
Remove Unvented Space Heater	\$ 78.96	9.90%	\$ 7.82
Vapor Barrier Needed (Basement/Crawlspace)	\$ 940.03	21.25%	\$ 199.76
Water Heater Replacement	\$ 693.64	7.78%	\$ 53.98
			\$ 2,673.00

Total Average H&S Cost Per Unit	2673.00
<del>Enter Estimated Production (Annual File: IV.2 WAP Production Schedule)</del>	<del>347</del>
<del>Enter Estimated Program Operations Budget</del>	<del>\$ 3,710,232</del>
<del>H&amp;S Budget (Total Average H&amp;S Cost Per Unit * Estimated Production)</del>	<del>\$ 927,547</del>
<del>Requested H&amp;S Percentage Per Unit (H&amp;S Budget/Program Operations)</del>	<del>25%</del>

## 4.0 – INCIDENTAL REPAIR MEASURES

*If Grantees choose to identify any H&S measures as incidental repair measures (IRMs), they must be implemented as such under the Grantee's weatherization program in all cases – meaning, they can never be applied to the H&S budget category. In order to be considered IRMs, the measure must fit the following definition and be cost justified along with the associated efficiency measure;*

*Incidental Repairs means those repairs necessary for the effective performance or preservation of weatherization materials. Such repairs include, but are not limited to, framing or repairing windows and doors which could not otherwise be caulked or weather-stripped and providing protective materials, such as paint, used to seal materials installed under this program. ([10 CFR 440 "Definitions"](#))*

Incidental repairs are those repairs necessary for the effective performance or preservation of weatherization materials. Such repairs include, but are not limited to, framing or repairing windows and doors which could not otherwise be caulked or weather-stripped, and providing protective materials, such as paint used to seal materials or vapor barriers used to protect floor insulation installed under WAP. Except where explicitly cited in the *Installation Standards*, dwellings that require incidental repairs must have a site-specific computerized audit to ensure that the package of measures do not reduce the overall SIR to less than 1.0. Incidental repairs must be included in the SIR calculation. If the projected incidental repairs drop the SIR below 1.0 and there are no other non-federal funds to leverage, the dwelling must be deferred. The following repairs must be cost justified through a properly executed computerized audit:

- A) Replacing deteriorated window or doors (for non-cost justified reasons)
- B) Repairing minor roof leaks
- C) Minor floor reinforcement
- D) Minor ceiling reinforcement
- E) Backing for wall insulation for an exterior closet (not knee walls)

## 5.0 – DEFERRAL/REFERRAL POLICY

*Deferral of services may be necessary if H&S issues cannot be adequately addressed according to WPN 17-07 guidance. The decision to defer work in a dwelling is difficult but necessary in some cases. This does not mean that assistance will never be available, but that work must be postponed until the problems can be resolved and/or alternative sources of help are found. If, in the judgment of the auditor, any conditions exist which may endanger the health and/or safety of the workers or occupants, the unit should be deferred until the conditions are corrected. Deferral may also be necessary where occupants are uncooperative, abusive, or threatening. Grantees must be specific in their approach and provide the process for clients to be notified in writing of the deferral and what conditions must be met for weatherization to continue. Grantees must also provide a process for the client to appeal the deferral decision to a higher level in the organization.*

Grantee has developed a comprehensive written deferral/referral policy that covers both H&S, and other deferral reasons?

Yes  No

Where can this deferral/referral policy be accessed?

Subgrantees are required to have a deferral policy on file. Conditions requiring that a dwelling to be placed on deferral status shall include, but shall not be limited to:

- A) The dwelling has been condemned or major dwelling mechanical systems have been "red tagged" by local or state code enforcement officials or utility providers and the system cannot be addressed with Health & Safety funds.
- B) The dwelling structure or its mechanical systems, including electrical and plumbing, are in such a state of disrepair that failure is imminent and the conditions cannot be resolved cost-effectively.
- C) The primary heating system at the dwelling is nonfunctioning or is functioning improperly and is deemed unsafe and must be replaced, or major repairs are needed and there are insufficient resources available.
- D) Dangerous conditions exist due to high CO levels in combustion appliances which cannot be resolved within weatherization program guidelines.
- E) Moisture problems are so severe they cannot be resolved within program guidelines.
- F) Unsanitary conditions are present in the dwelling that may endanger the health and safety of dwelling occupants or weatherization personnel should weatherization work be performed.
- G) Household members report documented health conditions that prohibit the installation of insulation and other weatherization materials.
- H) Household members, guests, or pets maintained at the dwelling are uncooperative, abusive, or threatening to weatherization staff or contractors.
- I) The extent and condition of lead-based paint or similar hazards in the dwelling may potentially create health and safety risks if weatherization work is performed.
- J) Illegal activities are being conducted in the dwelling unit.

## 6.0 – HAZARD IDENTIFICATION AND NOTIFICATION FORM(S)

*Documentation forms must be developed that include at a minimum: the client's name and address, dates of the audit/assessment and when the client 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 client(s) signature(s) indicating that they understand and have been informed of their rights and options.*

Documentation Form(s) have been developed and comply with guidance?                      Yes                       No

Client is informed of potential H&S issues at initial audit. Auditor gives H&S pamphlets and clients signs stating receipt and understanding.

## 7.0 – HEALTH AND SAFETY CATEGORIES

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

- Explain whether you concur with existing guidance from WPN 17-07 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 must be comprehensively explained and meet the intent of DOE guidance.
- Where an Action/Allowability or Testing is “required” or “not allowed” through WPN 17-07, Grantees must concur, or choose to defer all units where the specific category is encountered.
- “Allowable” items under WPN 17-07 leave room for Grantees to determine if the category, or testing, will be addressed and in what circumstances.
- Declare whether DOE funds or alternate funding source(s) will be used to address the particular category.
- Describe the explicit methods to remedy the specific category.
- Describe what testing protocols (if any) will be used.
- Define minimum thresholds that determine minor and major repairs
- Identify minimum documentation requirements for at-risk occupants
- Discuss what explicit steps will be taken to educate the client, if any, on the specific category if this is not explained elsewhere in the Plan. Some categories, like mold and moisture, require client education.
- Discuss how training and certification requirements will be provided for the specific category. Some categories, like Lead Based Paint, require training.
- Describe how occupant health and safety concerns and conditions will be solicited and documented

*Grantees may include additional H&S categories for their particular Programs. Additional categories must include, at a minimum, all of the same data fields as the DOE-provided categories. Two additional tables have been created to utilize.*

### 7.1 – Air Conditioning and Heating Systems

#### Concurrence, Alternative, or Deferral

Concurrence with Guidance                       Alternative Guidance                       Results in Deferral

Air Conditioning Unallowable Measure  Heating Unallowable Measure

#### Funding

DOE                       LIHEAP                       State                       Utility                       Other

#### How do you address unsafe or non-functioning primary heating/cooling systems?

These systems must be repaired or replaced prior to weatherization, or the home must be deferred.

#### How do you address unsafe or non-functioning secondary heating systems, Including unvented secondary space heaters?

Secondary systems must be repaired, replaced (vented systems) or removed (unvented systems) prior to weatherization or the home must be deferred. Clean and Tune of systems will be energy conservation or health and safety.

#### Indicate Documentation Required for At-Risk Occupants: over 65 yrs, disabled, pre-existing conditions.

We solicit information on health concerns from At-risk clients on the data collection form during the initial audit and the client self reports.

#### Testing Protocols

*ECTs performed by HVAC professional as warranted, which means they evaluate system to determine if unit can be cleaned and tuned for continued use or not. If the system cannot be cleaned and tuned for continued use due to age and/or condition and repairs exceed 1/3 of replacement costs, the unit will be replaced without a clean tune. The clean and tune is completed after proper evaluation within the approved Energy Audit Tool. Prior to replacement, attempt to cost justify as an ECM is completed via Energy Audit*

<b>Client Education</b>
Client Education document contains information on heating and cooling systems.
<b>Training</b>
Subgrantee Auditors are trained in diagnostic testing and visual inspection of HVAC systems.

## 7.2 - Asbestos - All

### What is the blower door testing policy when suspected Asbestos Containing Material (ACM) is identified?

Where hazardous materials such as asbestos or vermiculite insulation exist that may be circulated, blower door diagnostics shall not be performed.

### 7.2a – Asbestos - in siding, walls, ceilings, etc.

#### Concurrence, Alternative, or Deferral

Concurrence with Guidance       Alternative Guidance       Results in Deferral

#### Funding

DOE       LIHEAP       State       Utility       Other

### How do you address suspected ACM's in siding, walls, or ceilings that will be disturbed through the course of weatherization work?

testing and removal where performed by an appropriately trained or AHERA certified asbestos control professional; deferral if this is not an option. This is done on case-by-case basis.

#### Testing Protocols

See above.

#### Client Education

Contained in client education document.

#### Training and Certification Requirements

Weatherization crews must take asbestos class 3 operation and maintenance class with refresher course yearly.

### 7.2b – Asbestos - in vermiculite

#### Concurrence, Alternative, or Deferral

Concurrence with Guidance       Alternative Guidance       Results in Deferral

#### Funding

DOE       LIHEAP       State       Utility       Other

### How do you address suspected ACM's in vermiculite that will be disturbed through the course of weatherization work?

testing and encapsulation where performed by an appropriately trained or AHERA certified asbestos control professional; deferral if this is not an option.

#### Testing Protocols

See above.

#### Client Education

Contained in client education document.

#### Training and Certification Requirements

Weatherization crews must take asbestos class 3 operation and maintenance class with refresher course yearly.

7.2c – Asbestos - on pipes, furnaces, other small covered surfaces				
<b>Concurrence, Alternative, or Deferral</b>				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
<b>Funding</b>				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input checked="" type="checkbox"/>	Other <input type="checkbox"/>
<b>How do you address suspected ACM's (e.g., pipes, furnaces, other small surfaces) that will be disturbed through the course of weatherization work?</b>				
testing/treating/encapsulation or removal where performed by an appropriately trained or AHERA certified asbestos control professional on a case-by-case basis.				
<b>Testing Protocols</b>				
See above.				
<b>Client Education</b>				
Contained in client education document.				
<b>Training and Certification Requirements</b>				
Weatherization crews must take asbestos class 3 operation and maintenance class with refresher course yearly.				

7.5 – Biologicals and Unsanitary Conditions (odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.)				
<b>Concurrence, Alternative, or Deferral</b>				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Unallowable Measure <input type="checkbox"/>				
<b>Funding</b>				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input checked="" type="checkbox"/>	Other <input type="checkbox"/>
<b>What guidance do you provide Subgrantees for dealing with biological and/or unsanitary conditions in homes slated for weatherization?</b>				
This is contained in NC WAP SWS section 5520: Biological Hazards and Poor Sanitation				
<b>Testing Protocols</b>				
Testing conducted as needed to verify hazards.				
<b>Client Education</b>				
Contained in client education document; clients are notified if these conditions exist.				
<b>Training</b>				
Weatherization workers are trained to identify these conditions and take appropriate action.				

7.6 – Building Structure and Roofing				
<b>Concurrence, Alternative, or Deferral</b>				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
<b>Funding</b>				
DOE <input type="checkbox"/>	LIHEAP <input type="checkbox"/>	State <input type="checkbox"/>	Utility <input checked="" type="checkbox"/>	Other <input checked="" type="checkbox"/>

<b>What guidance do you provide Subgrantees for dealing with structural issues (e.g., roofing, wall, foundation) in homes slated for weatherization?</b>
Only very minor structural issues are allowable, otherwise dwelling is deferred - problem(s) are corrected using other funding.
<b>How do you define “minor” or allowable structure and roofing repairs, and at what point are repairs considered beyond the scope of weatherization?</b>
Only repairs under 10 square feet are allowable as an incidental repair and must be cost justified with a computer audit. Larger repairs require deferral until corrections are made with other funding.
<b>If priority lists are used, and these repairs are designated as Incidental Repairs, at what point is a site-specific audit required?</b>
See above.
<b>Client Education</b>
Contained in client education document; clients are notified if these conditions exist.
<b>Training</b>
Auditors are trained to identify structural issues at the initial audit.

<b>7.7 – Code Compliance</b>				
<b>Concurrence, Alternative, or Deferral</b>				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
<b>Funding</b>				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input checked="" type="checkbox"/>	Other <input checked="" type="checkbox"/>
<b>What guidance do you provide Subgrantees for dealing with code compliance issues in homes receiving weatherization measures?</b>				
Correction of preexisting code compliance issues is not an allowable cost other than where weatherization measures are being conducted.				
<b>What specific situations commonly trigger code compliance work requirements for your network? How are they addressed?</b>				
Situations where weatherization measures are conducted that would affect electrical wiring, plumbing, or HVAC appliances.				
<b>Client Education</b>				
Contained in client education document; clients are notified if code conditions exist.				
<b>Training</b>				
Auditors are trained on how to identify code compliant construction.				

<b>7.8 – Combustion Gases</b>				
<b>Concurrence, Alternative, or Deferral</b>				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
<b>Funding</b>				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input checked="" type="checkbox"/>	Other <input type="checkbox"/>
<b>Testing Protocols</b>				
Field staff use BPI Combustion Appliance Zone testing procedures uploaded to PAGE.				
<b>How are crews instructed to handle problems discovered during testing, and what are the specific protocols for addressing hazards that require an immediate response?</b>				

ECTs performed by HVAC professional as warranted, which means they evaluate system to determine if unit can be cleaned and tuned for continued use or not. If the system cannot be cleaned and tuned for continued use due to age and/or condition and repairs exceed 1/3 of replacement costs, the unit will be replaced without a clean tune. The clean and tune is completed after proper evaluation within the approved Energy Audit Tool. Prior to replacement, attempt to cost justify as an ECM is completed via Energy Audit

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<b>Crews are trained to comply with BPI standards regarding problems during testing and the protocols for addressing hazards, including Combustion Safety Test Action Levels.</b>
<b>Client Education</b>
Contained in client education document; clients are notified immediately if problems are found with combustion appliances.
<b>Training</b>
Auditors, final inspectors, and crew leaders receive classroom and ongoing in-field training on BPI Combustion Appliance Zone testing procedures.

<b>7.9 – Electrical</b>		
<b>Concurrence, Alternative, or Deferral</b>		
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>
<b>Funding</b>		
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/> Utility <input checked="" type="checkbox"/> Other <input checked="" type="checkbox"/>
<b>What guidance do you provide Subgrantees for dealing with electrical hazards, including knob &amp; tube wiring, in homes slated for weatherization?</b>		
NC SWS provides detailed guidance on this in section 5640.		
<b>How do you define “minor” or allowable electrical repairs, and at what point are repairs considered beyond the scope of weatherization?</b>		
Minor electrical repairs are typically those costing less than 1000.00. Electrical repairs over this amount may be deferred if a lack of health and safety dollars to make major electrical repairs. Handled on case-by-case basis.		
<b>If priority lists are used, and these repairs are designated as Incidental Repairs, at what point is a site-specific audit required?</b>		
These repairs are designated as Health and Safety repairs, and are not subject to a site specific (computer) audit.		
<b>Client Education</b>		
Clients are notified at initial audit if any electrical hazards exist and what the course of action will be.		
<b>Training</b>		
Auditors are trained to identify potential electrical hazards.		

<b>7.10 – Formaldehyde, Volatile Organic Compounds (VOCs), Flammable Liquids, and other Air Pollutants</b>		
<b>Concurrence, Alternative, or Deferral</b>		
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>
<b>Funding</b>		
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input checked="" type="checkbox"/>
<b>What guidance do you provide Subgrantees for dealing with formaldehyde, VOCs, flammable liquids, and other air pollutants identified in homes slated for weatherization?</b>		
Guidance is provided in section 5440 of the NC SWS, as well as ongoing in-field training.		
<b>Testing Protocols</b>		
Auditors are trained to identify pollutants and take the appropriate action.		
<b>Client Education</b>		
Clients are notified at initial audit if any pollutants exist and what the course of action will be.		
<b>Training-ongoing provided per SWS</b>		



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<b>7.11 – Fuel Leaks</b> <i>(please indicate specific fuel type if policy differs by type)</i>				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input checked="" type="checkbox"/>	Other <input type="checkbox"/>
Remediation Protocols				
Leaks must be repaired by a licensed professional.				
How do you define allowable fuel leak repairs, and at what point are repairs considered beyond the scope of weatherization?				
Minor leak repairs under 1000.00 are allowable. Major leaks may only be repaired using other funding or home must be deferred.				
Client Education				
Contained in client education document.				
Training				
Auditors are trained to identify fuel leaks on an ongoing basis.				

<b>7.12 – Gas Ovens / Stovetops / Ranges</b>				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input checked="" type="checkbox"/>	Other <input type="checkbox"/>
What guidance do you provide Subgrantees for addressing unsafe gas ovens/stoves/ranges in homes slated for weatherization?				
NC WAP SWS section 6520 addresses this.				
Testing Protocols				
NC WAP SWS section 6520 addresses this.				
Client Education				
Contained in client education document.				
Training				
Auditors are trained to address these appliances as part of required combustion safety testing.				

<b>7.13 – Hazardous Materials Disposal</b> <b>[Lead, Refrigerant, Asbestos, Mercury (including CFLs/fluorescents), etc.]</b> <i>(please indicate material where policy differs by material)</i>				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>

<b>Client Education</b>		
Contained in client education document.		
<b>Training</b>		
Auditors and crews are trained on disposal of such materials, including Lead Renovation, Repair & Painting RRP		
<b>Disposal Procedures and Documentation Requirements</b>		
NC WAP SWS addresses this in multiple sections. Documentation of proper disposal must be in every client file, including Lead Renovation, Repair & Painting (RRP).		

<b>7.14 – Injury Prevention of Occupants and Weatherization Workers (Measures such as repairing stairs and replacing handrails)</b>				
<b>Concurrence, Alternative, or Deferral</b>				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
<b>Funding</b>				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
<b>What guidance do you provide Subgrantees regarding allowable injury-related repairs (e.g., stairs, handrails, porch deck board)?</b>				
NC WAP SWS section 5550 addresses this.				
<b>How do you define “minor” or allowable injury prevention measures, and at what point are repairs considered beyond the scope of weatherization? Quantify “minor” or allowable injury prevention measures.</b>				
From NC WAP SWS section 5550: “Minor repair shall be allowable to secure steps and handrails where such actions are necessary to effectively weatherize the dwelling. Measures deemed unnecessary or excessive shall be prohibited.”				
<b>Training</b>				
Auditors and crews are trained on injury prevention on a regular basis; monthly safety meetings are required.				

<b>7.15 – Lead Based Paint</b>				
<b>Concurrence, Alternative, or Deferral</b>				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
<b>Funding</b>				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input checked="" type="checkbox"/>	Other <input type="checkbox"/>
<b>Safe Work Protocols</b>				
NC WAP SWS addresses this section 2420.				
<b>Testing Protocols</b>				
NC WAP SWS addresses this section 5200 and 5660.				
<b>Client Education</b>				
Contained in client education document.				
<b>Training and Certification Requirements</b>				
Described in NC WAP SWS section 2420				
<b>Documentation Requirements</b>				

A renovator of record certification must be in any client file where lead safe work occurred

### 7.16 – Mold and Moisture

(Including but not limited to: drainage, gutters, down spouts, extensions, flashing, sump pumps, dehumidifiers, landscape, vapor retarders, moisture barriers, etc.)

#### Concurrence, Alternative, or Deferral

Concurrence with Guidance  Alternative Guidance  Results in Deferral

#### Funding

DOE  LIHEAP  State  Utility  Other

**What guidance do you provide Subgrantees for dealing with moisture related issues (e.g., drainage, gutters, down spouts, moisture barriers, dehumidifiers, vapor barrier on bare earth floors) in homes slated for weatherization?**

NC WAP SWS section 5700 addresses this.

**How do you define “minor” or allowable moisture-related measures, and at what point is work considered beyond the scope of weatherization?**

Mold and/or moisture issues under 10 square feet may be remediated. Larger areas may be cause for deferral if other funding is not available.

#### Client Education

Contained in client education document.

#### Training

Auditors are trained to identify these types of hazards on an ongoing basis.

### 7.17 – Pests

#### Concurrence, Alternative, or Deferral

Concurrence with Guidance  Alternative Guidance  Results in Deferral

#### Funding

DOE  LIHEAP  State  Utility  Other

**What guidance do you provide Subgrantees for dealing with pests and pest intrusion prevention in homes slated for weatherization?**

Contained in client education document.

#### Define Pest Infestation Thresholds, Beyond Which Weatherization Is Deferred

NC WAP SWS section 5530 addresses; thresholds are defined on a case-by-case-basis; recurring treatment plans are not an allowable expense.

#### Testing Protocols

Visual inspection for pests or pest waste prior to diagnostic testing (blower door) is required.

#### Client Education

Contained in client education document.

#### Training

Auditors are trained to identify these types of hazards.

### 7.18 – Radon

#### Concurrence, Alternative, or Deferral

Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>
<b>Funding</b>		
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>
Utility <input checked="" type="checkbox"/>	Other <input type="checkbox"/>	
Precautionary package of radon measures will be completed on all dwelling units when applicable.		
<b>What guidance do you provide Subgrantees around radon?</b>		
SWS section 5670 to be updated per WPN 22-7. Radon pamphlet/precautionary Consent form provided to client.		
<b>Testing Protocols radon testing allowed in Radon Zones 1&amp;2.</b>		
<b>Client Education</b>		
Contained in client education document and Precautionary Consent form for client signature..		
<b>Training and Certification Requirements</b>		
Auditors are trained on this topic during monitoring visits and as part of other certifications and trainings.		
<b>Documentation Requirements</b>		
Radon testing is allowable in RADON Zones 1 and 2 in North Carolina. Mitigation is not an allowable expense .		

<b>7.19 – Safety Devices: Smoke and Carbon Monoxide Alarms, Fire Extinguishers</b>		
<b>Concurrence, Alternative, or Deferral</b>		
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>
<b>Funding</b>		
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>
Utility <input checked="" type="checkbox"/>	Other <input type="checkbox"/>	
<b>What is your policy for installation or replacement of the following:</b>		
Smoke Alarms: Described in NC WAP SWS section 5631		
Carbon Monoxide Alarms: Described in NC WAP SWS section 5621		
Fire Extinguishers: Described in NC WAP SWS section 5630		
<b>Testing Protocols</b>		
All alarms tested and replaced or installed as needed. Fire Extinguishers are allowed on a case by case basis where solid fuel burning appliances are present.		
<b>Client Education</b>		
Contained in client education document.		
<b>Training</b>		
Auditors are trained to identify safety device needs in the dwelling.		

<b>7.20 – Occupant Health and Safety Concerns and Conditions</b>		
<b>Concurrence, Alternative, or Deferral</b>		
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>
<b>Funding</b>		
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>
Utility <input type="checkbox"/>	Other <input type="checkbox"/>	
<b>What guidance do you provide Subgrantees for soliciting the occupants’ health and safety concerns related to components of their homes?</b>		
Contained in client education document; Subgrantee applications also direct clients to list any safety and/or health issues. Agency documents at risk client info in client file.		

<b>What guidance do you provide Subgrantees for determining whether occupants suffer from health conditions that may be negatively affected by the act of weatherizing their home?</b>		
See above.		
<b>What guidance do you provide Subgrantees for dealing with potential health concerns when they are identified?</b>		
Subgrantees are trained to immediately notify clients of potential health concerns as soon as they are discovered.		
<b>Client Education</b>		
Contained in client education document.		
Documentation Form(s) have been developed and comply with guidance?    Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		

<b>7.21 – Ventilation and Indoor Air Quality</b>				
<b>Concurrence, Alternative, or Deferral</b>				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
<b>Funding</b>				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input checked="" type="checkbox"/>	Other <input checked="" type="checkbox"/>
<b>Identify the Most Recent Version of ASHRAE 62.2 Implemented (optional: identify Addenda used)</b>				
ASHRAE 62.2 2016				
<b>Testing and Final Verification Protocols</b>				
Described in NC WAP SWS sections 5800-5820.				
<b>Client Education</b>				
Contained in client education document				
<b>Training</b>				
Auditors are trained on ventilation and indoor air quality on an ongoing basis.				

<b>7.22 – Window and Door Replacement, Window Guards</b>				
<b>Concurrence, Alternative, or Deferral</b>				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
<b>Funding</b>				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input checked="" type="checkbox"/>	Utility <input checked="" type="checkbox"/>	Other <input type="checkbox"/>
<b>What guidance do you provide to Subgrantees regarding window and door replacement and window guards?</b>				
NC WAP SWS addresses this in sections 9250-9271.				
<b>Testing Protocols</b>				
See above.				
<b>Client Education</b>				
Contained in client education document.				
<b>Training</b>				
Crews and auditors are trained on how to address window and door sealing and repair or replacement.				

7.23 – Worker Safety (OSHA, etc.)				
<b>Concurrence, Alternative, or Deferral</b>				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
<b>Funding</b>				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
<b>How do you verify safe work practices? What is your policy for in-progress monitoring?</b>				
OSHA confined space, fall protection, and safety data sheets were designed by NC WAP and are required as part of weatherization. NC WAP will also review at least one “in-progress” dwelling at each dwelling annually. Subgrantees are required to have regular documented safety meetings.				
<b>Training and Certification Requirements</b>				
OSHA 10 required for crew leaders. OSHA 30 allowable for field staff but, not required.				

7.24 – <Add in Topic>				
<b>Concurrence, Alternative, or Deferral</b>				
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
<b>Funding</b>				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
<b>Remediation Protocols</b>				
<b>7.1 At Risk Clients: definition will apply PY20 HVAC installs in absence safe HVAC/or safely operating HVAC.</b>				
<b>Client Education</b> See Attached document in PAGE				
Training: New auditors trained on H&S guidelines listed in Field Standards by: CHP trainer, Prog Mgr, State Monitors, and at state WAP conferences.				

7.24 – <Add in Topic>				
<b>Concurrence, Alternative, or Deferral</b>				
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
<b>Funding</b>				
DOE <input type="checkbox"/>	LIHEAP <input type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
<b>Remediation Protocols</b>				
<b>Testing Protocols</b>				
<b>Client Education</b>				
<b>Training</b>				

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