

Weatherization Grantee Health and Safety (H&S) Plan- *Optional Template* **Arkansas Energy Office**

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.

Arkansas is requesting that twenty-three percent (23%) of program operations budget be set aside for H&S expenditures. H&S limit may vary by Subgrantee depending upon selected H&S measures, availability of alternate funding sources, and conditions found in different geographical areas. Subgrantee H&S costs may not exceed 24.99% by program year's end. However, the network has projected twenty-one percent (21%) for this up-coming 2024-25.

Fifteen percent (15%) 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 recommend 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.

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. Alternatively, the measure matrix is also available as a standalone spreadsheet located at the following link: [Weatherization Program Notice 22-7: Weatherization Health and Safety | Department of Energy](#)



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.

Arkansas has not identified any H&S measures as incidental repair measures (IRMs).

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

Grantees must develop a written policy that includes, at a minimum, the following documentation relating to H&S Plan implementation and maintain signed copies in each client file. Each notification must include the occupant(s) (and landlord if applicable) name and address, be signed and dated by the occupant (and landlord if applicable) indicating that they understand and have been informed of their rights and options and signed by the Subgrantee personnel collecting the information.

Required topics are:

▪ **Occupant Pre-existing or Potential Health Condition Screening**

- Provides documentation that allows occupant(s) to self-report known or suspected health concerns as part of initial application for weatherization, during the energy audit, or other part of the weatherization process as specified. Must minimally contain the following:
 - Any known risks associated with the measures and materials being installed
 - Subgrantee point of contact information for occupant(s)
 - Date of screening

▪ **Hazard Identification Notification**

- Provides documentation that the occupant and landlord (if applicable), have been informed of any potential hazards identified during the energy audit or intake process. Must minimally contain the following:
 - 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, including any testing results
 - A statement indicating if, or when weatherization could continue

Radon Informed Consent Form

- Provides documentation that the occupant(s) (and landlord if applicable) have been informed of any potential hazards associated with radon in weatherized dwellings. The form must minimally contain the following:
 - An explanation on the potential small risk of increasing radon levels when building tightness is improved. This is based on the results of the [Buildings Assessment of Radon Reduction Interventions with Energy retrofits Expansion Study \(The BEX Study\)](#)
 - A list of precautionary measures WAP will install based on [EPA Healthy Indoor Environment Protocols](#).
 - Some of the benefits of Weatherization including energy savings, energy cost savings, improved home comfort, and increased safety.

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

Deferral of services may be necessary if H&S issues cannot be adequately addressed according to WPN 17-06 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.

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

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

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

The deferral/referral policy can be accessed in the Arkansas Subgrantee Operations Manual.

Location where forms have been uploaded/submitted

Separate attachment to SF424 ☐

Separate attachment to H&S Plan ☐

6.0 – HEALTH AND SAFETY CATEGORIES

For each of the following H&S categories identified by DOE in the following tables, follow the directions below.

- Any section that is “Required” below must be explicitly detailed in the H&S Plan regardless of funding source used. If the Grantee checks the box for “Concurrence with DOE Guidance” the contents of the box may be left as it exists or reference the section/location within Grantee Policy and Procedure manual that contains language or insert Grantee specific language. If the “Alternative Guidance” box is checked, the Grantee must provide that alternative guidance in the box.
 - If a Grantee is proposing an alternative action/allowability for a “Required” item, the alternative requires comprehensive explanation of how it meets the intent of the DOE program notice.
 - If a “Required” item/category will not be addressed with any funding source and will always result in deferral, the H&S Plan must state that.
- Any section that is “Allowable” below must be detailed only if DOE WAP funds are used to implement the measures. If the Grantee uses DOE funds for any “Allowable” activities from the Table of Issues then they must be described here in detail, including defining “minor”, “major”, “limited”, “case-by-case”, and “at-risk” if the term is applied. If you only check the box “Allowed with Alternative Funds” then no additional information is required.
- Any section that is “Prohibited” below may not be addressed with DOE WAP H&S funds and does not need to be specifically addressed in the H&S Plan. The Grantee simply needs to check the “Concur with DOE guidance” box and indicate if the condition will result in deferral/referral.
- The Grantee H&S Plan may address additional H&S hazards specific to their program that are not included in the Table of Issues. If a Grantee chooses to include additional measures as DOE WAP funded H&S costs, the H&S Plan must include details pertaining to the measures allowed, testing required, and client education for these specific hazards.
- All required “Testing/Inspection” related items must be documented in the client file to verify completion and results.

6.1 – Air-Conditioning, Heating Systems, and Combustion Appliances

Required Actions

Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☒	Alternative Funds ☐	
• Replace, repair, or install primary heating systems when existing primary heating systems are unsafe, inoperable, or nonexistent. No home may be left without a safe primary heating system after weatherization where climate conditions require heating (i.e., all climate zones except zone 1 as defined by ASHRAE). If unable to meet this requirement, deferral is required. • No DOE-funded weatherization work is permitted if the completed dwelling unit will be heated with an unvented combustion space heater as the primary heat source. The primary heat source must be replaced with a vented unit prior to or by weatherization. The replacement unit must be sized to heat the entire dwelling unit. • Unsafe secondary units, including space heaters, must be repaired, or removed and disposed of, or deferral is required. Secondary unvented space heaters are considered unsafe if they: ○ are not listed and labeled as meeting ANSI Z21.11.2; ○ have an input rating of more than 40,000 BTU/hour; ○ are in a bedroom and have an input rating of more than 10,000 BTU/hour; ○ are in a bathroom and have an input rating of more than 6,000 BTU/hour; ○ are operating in an unsafe manner (e.g., high carbon monoxide (CO) readings, too close to combustible materials, lack sufficient combustion air volume); ○ or are not permitted by the Authority Having Jurisdiction (AHJ). • DOE WAP Grantees must comply with the Manufactured Home Construction and Safety Standards which mandates that: ○ All fuel-burning appliances in manufactured homes except: ranges, ovens, illuminating appliances, clothes dryers, solid fuel-burning fireplaces and solid fuel-burning stoves, must be installed to provide for the complete separation of the combustion system from the interior atmosphere of the manufactured home (i.e., to draw their combustion air from outside), and be vented to outside the dwelling. ○ All appliances installed by weatherization in manufactured homes must meet these standards, including secondary heating sources. No unvented fuel-burning space heating appliances may remain in a MH after weatherization under any circumstances. If an occupant will not allow the removal of an unsafe combustion appliance from the home, deferral is required. ○ Repair or replace combustion gas venting to ensure proper combustion gas venting to outside the dwelling for all combustion appliances, including but not limited to gas dryers and refrigerators, furnaces, vented space heaters, and water heaters. • If weatherization installs an appliance that is vented into a masonry chimney, the chimney must be lined in compliance with the International Fuel Gas Code (IFGC) or local AHJ if more stringent. • Install adequate combustion air for all combustion appliances left after weatherization. • If permits are required for heating/cooling system work, they must be secured and are a program operation cost if the installation is an ECM or may be included in the H&S cost if installed as a H&S measure. • If unsafe conditions relating to existing combustion appliances require remediation to safely perform weatherization and cannot be remedied by repair or tuning, replacement is an allowable H&S measure unless prevented by other guidance herein. • Documentation justifying the replacement with a cost comparison between replacement and repair must be maintained in the client file.		
Allowable Actions		
Allowed with DOE WAP H&S Funds ☒	Allowed with Alternative Funds ☐	

Prohibited Actions	
Concur with DOE Guidance ☐	
Arkansas considers “red tagged”, inoperable, or non-existent heating systems to constitute a Health & Safety issue. Evaluation of the home for replacement, repair, or installation is required, unless prevented by other guidance herein. Air conditioning system replacement, repair, or installation is allowed in homes of at-risk occupants. “System” can mean a central unit or several individually operating units; however, when a central unit is in place, it shall be considered the primary unit, and all other units are to be considered secondary. When a space conditioning system does not qualify as an ECM, the following conditions must be met before the unit can be replaced or repaired with Health and Safety funds:	
Required Testing/Inspection	
Concur with DOE Guidance ☒	Alternative Guidance ☐

Action/Allowability to address unsafe or non-functioning primary heating/cooling systems

- “Red tagged,” inoperable, or nonexistent primary heating system may be replaced, repaired, or installed where climate conditions warrant, consistent with this guidance.
- Unsafe primary units must be repaired, replaced and removed, or rendered inoperable, or deferral is required.
- Use proper sizing protocols (Manual J, State Approved sizing protocols, ECOS, NEAT/MHEA outputs, etc.) based on post-weatherization housing characteristics, including installed mechanical ventilation, when installing or replacing a heating or cooling appliance.
- See Hazardous Materials Disposal section for more information.

Action/Allowability to address unsafe or non-functioning secondary heating systems, including unvented secondary space heaters.

- Replacement or installation of secondary units is not allowed.
- Unsafe secondary units, including space heaters, must be repaired, removed or rendered inoperable, or deferral is required.

Documentation required for at-risk occupants.

- Primary air conditioning system replacement, repair, or installation is allowed only in homes 1) that have existing A/C systems, 2) where current occupants meet Grantee’s definition of “at-risk” AND climate conditions warrant, and 3) when a high efficiency heat pump is the most cost-efficient heating system replacement choice, even when the additional cost of air conditioning the home is included in the economic evaluation of the heating replacement.
- Replacement of an inoperable unit that cannot be repaired must be based on the needs of the occupants and be done with H&S funds under the following circumstances: occupants are elderly, children, or person(s) with a medical condition documented by a physician’s statement of requirement for air conditioning.

Testing Protocols

- Make sure primary systems are present, operable, and performing correctly.
- Check DOE-approved audit to determine if the system can be installed as an energy conservation measure (ECM) prior to replacement as an H&S measure.
- Determine and document presence of “at-risk” current occupants when installing air-conditioning as a Health and Safety (H&S) measure.
 - On combustion equipment, inspect chimney and flue and test for Combustion Appliance Zone (CAZ) depressurization.
- For solid fuel appliances look for visual evidence of soot on the walls, mantel or ceiling or creosote staining near the flue pipe.

Grantee Combustion Testing Action Levels

Describe the Grantee policy and actions based on the results of depressurization, spillage, and CO measurements taken during combustion testing for all combustion appliances.

Grantee Woodstove & Fireplace inspection/testing policy including actions/limits

Concur with DOE Guidance ☐

Alternative Guidance ☐

Fireplace or woodstove venting that is left operational after weatherization must meet current local or national standards or the home must be deferred.

Required Occupant Education

Concur with DOE Guidance ☒

Alternative Guidance ☐

- When deferral is necessary, provide information to the client, in writing, describing conditions that must be met in order for weatherization to commence. A copy of this notification must also be placed in the client file.
- Discuss appropriate use and maintenance of units.
- If a heat pump is the most cost-effective replacement in a previously un-air-conditioned home (as described above) and the client does not qualify as “at-risk” for air conditioning, client education must include a discussion of the additional costs they will incur to operate the heat pump as an air conditioner.
- Provide all paperwork and manuals for any installed equipment.

Training

- Discuss and provide information on proper disposal of bulk fuel tanks when not removed as part of the weatherization work.
- Where combustion equipment is present, provide safety information including how to recognize depressurization.
- Comprehensive training has been provided during the annual conference and during the program year in the field. Specific training may be provided during the PY 20’ if a need is determined.
- Licensing and/or certification for HVAC installers as required by authority having jurisdiction (AHJ).
- C A Z depressurization test and inspection training.

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

Required Actions

Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☒	Alternative Funds ☐	

- When suspected friable Asbestos Containing Materials (ACM) are present, including vermiculite, assume they contain asbestos and take precautionary measures to prevent disturbing it during the audit and work unless testing determines otherwise.
- Grantees must have written policy included in their H&S plan for:
 - Identifying and managing suspected ACM that provides for reasonable and necessary precautions to prevent asbestos contamination in the home.
 - Addressing blower door testing where suspected friable ACM is present (as defined by EPA), including vermiculite.

Grantee ACM policy

Describe Grantee’s policy for identifying and managing suspected ACM

Grantee Blower Door Testing Policy When Suspected ACM Exists

In Arkansas WAP, blower door tests are not performed where there are confirmed or suspected ACM, until written verification by a certified asbestos professional has been received stating that the material is non-asbestos containing or has been removed or encapsulated. In Arkansas, general asbestos removal is not approved as a Health and Safety weatherization cost with federal funds. Major asbestos problems are referred to the appropriate State agency and/or the Environmental Protection Agency (EPA).

Allowable Actions

Allowed with DOE WAP H&S Funds ☒	Allowed with Alternative Funds ☐
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Action/Allowability

- When vermiculite is present, the home will be deferred until the removal of vermiculite by a certified asbestos professional is completed.
- DOE/LIHEAP funds cannot be used for testing or removal.
- Clients will be instructed to not disturb the vermiculite.
 - Asbestos safety information will be provided. Documentation of this instruction is maintained in the Client's file.
- When deferral is necessary due to asbestos, occupant must provide documentation that a certified professional performed the remediation before weatherization work continues.

Prohibited ActionsConcur with DOE Guidance ☐

Using DOE WAP H&S funds for general abatement/removal/or replacement of asbestos siding, thermal system insulation (TSI) or Transite, or vermiculite is prohibited.

Required Testing/InspectionConcur with DOE Guidance ☒Alternative Guidance ☐Results in Deferral/Referral ☐DOE WAP H&S Funds ☐Alternative Funds ☐

- Visually inspect all surfaces (i.e., walls, floors, ceilings, roofs) for suspected ACM prior to drilling or cutting.
- Assume asbestos is present in suspect materials unless testing reveals otherwise.

Allowable Testing/InspectionAllowed with DOE WAP H&S Funds ☒Allowed with Alternative Funds ☐

No testing will be performed by weatherization workers or weatherization contractors.

Required Occupant EducationConcur with DOE Guidance ☒Alternative Guidance ☐

- Instruct clients in writing not to disturb suspected ACM.
- Provide asbestos safety information to the client.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

Training and Certification Requirements

- Specific training may be provided on how to recognize vermiculite (if a need is determined).
- AHERA or other appropriate asbestos control professional certification/training is required to abate the ACM.

6.3 – Biologicals and Unsanitary Conditions**Required Actions**Concur with DOE Guidance ☒Alternative Guidance ☐Results in Deferral/Referral ☐DOE WAP H&S Funds ☒Alternative Funds ☐

Deferral where conditions (odors, bacteria, raw sewage, rotting wood, etc.) in the home pose a health risk to occupants and/or weatherization workers or may be worsened by weatherization activities (e.g., air sealing) and will not be resolved by weatherization.

Allowed ActionsAllowed with DOE WAP H&S Funds ☒Allowed with Alternative Funds ☐

Action/Allowability

- 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.
- Assess the cost-effectiveness and necessity of remediation of these conditions on a case by case basis with prior approval from AEO;
- The use of personal protective equipment shall be strictly enforced. Respirators, protective eyewear, and protective clothing will be worn when biological agents are present or suspected in order to eliminate or minimize crew exposure.
- Caution should be taken when selecting air tightness limits for dwellings with these conditions. Since these conditions are often related to moisture, Arkansas requires local agency crews to assess moisture conditions as part of the initial energy audit procedure.
- Addressing raw sewage/gray water is not an allowable cost.
- See Mold and Moisture section for more information.
- Deferral may be necessary in cases where conditions in the home pose a health risk to occupants and/or weatherization workers.

Required Testing/Inspection

Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☒	Alternative Funds ☐	

- Sensory inspection.

Prohibited Testing/Inspection

Concur with DOE Guidance ☐

Required Occupant Education

Concur with DOE Guidance ☒	Alternative Guidance ☐
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- Inform client in writing of observed conditions.
- Provide information on how to maintain a sanitary home and steps to correct deferral conditions.
- Safety and preventive measures regarding any observed biological and unsanitary conditions are addressed with the Client during the initial audit of the home.
- The Client is also given a copy of "A Brief Guide to Mold, Mildew and Moisture, and Your Home."
- The Client acknowledges receipt of this information and signs off on the Client Education Checklist (WAP 13).
- Documentation of the instruction is maintained in the client file.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.
- Specific training will be provided during PY '24. Grants Guidance on how to recognize unsafe conditions and when to defer.
- Safe work practices when encountering such conditions.

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

Allowed with DOE WAP H&S Funds ☒	Allowed with Alternative Funds ☐
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Action/Allowability

- Building rehabilitation is beyond the scope of the Weatherization Assistance Program.
- Homes that require more than minor repairs must be deferred.
- See Mold and Moisture, Code Compliance, and Pests sections for more information.
- The Energy Auditor must have access to all aspects of the structure in order to adequately and appropriately gather data for the ECOS energy audit. Clothing, dogs, trash or other impediments restricting access to any portion or portions of the dwelling that block necessary access may constitute a deferral.
- Dwellings whose structural integrity is in question should be referred to other appropriate local and state agencies.

Prohibited ActionsConcur with DOE Guidance ☒Using DOE WAP H&S funds for *major* repairs as defined by Grantee's H&S Plan.

Using DOE WAP H&S funds for building rehabilitation is prohibited

Define "major" repairs

Minor repairs to protect DOE or LIHEAP materials installed may be used to protect the energy saving investment. However, building rehabilitation is beyond the scope of the WAP.

If the overall structure of the house is in good condition and the repairs are minor a request to address the condition can be submitted on a case-by-case scenario. A cost assessment and a feasible course of action must be submitted with the request to AEO.

Required Testing/InspectionConcur with DOE Guidance ☒Alternative Guidance ☐Results in Deferral/Referral ☐DOE WAP H&S Funds ☒Alternative Funds ☐

Visual inspection of building structure and roofing for damages that compromise building durability and to verify that portions of the home where weatherization will occur are safe for entry and performance of assessments, work, and inspections.

Allowable Testing/InspectionAllowed with DOE WAP H&S Funds ☒Allowed with Alternative Funds ☐**Testing**

- Visual inspection.
- Ensure that access to the portions of the home where weatherization will occur are safe for entry and performance of assessments, work, and inspections.

Prohibited Testing/InspectionConcur with DOE Guidance ☐

Using DOE WAP H&S funds for any testing/evaluation of structural materials by a third-party is prohibited.

Required Occupant EducationConcur with DOE Guidance ☒Alternative Guidance ☐

- Notify client in writing of structurally compromised areas.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

Training:

Specific training may be provided on How to identify structural and roofing issues if a need is determined. Trainers will be sought from the Arkansas Department of Health – State Code.

6.5 – Code Compliance**Allowable Actions**Allowed with DOE WAP H&S Funds ☒Allowed with Alternative Funds ☐

If DOE WAP H&S Funds are used for any “allowable” actions, detail them here.

Prohibited ActionsConcur with DOE Guidance ☒**Action/Allowability**

- Correction of preexisting code compliance issues is not an allowable cost unless triggered by weatherization measures being installed in a specific room or area of the home.
- When correction of preexisting code compliance issues is triggered and paid for with WAP funds, cite specific code requirements with reference to the weatherization measure(s) that triggered the code compliance issue must be placed in the client file.
- Follow State and local or AHJ codes while installing weatherization measures, including H&S measures.
- Condemned properties and properties where “red tagged” H&S conditions exist that cannot be corrected under this guidance must be deferred.

Required Testing/InspectionConcur with DOE Guidance ☒Alternative Guidance ☐Results in Deferral/Referral ☐DOE WAP H&S Funds ☒Alternative Funds ☐

- Visual inspection.
- Sub grantees are required to check with the local code enforcement office in the city or county where the weatherization job is located if:
 - Any circumstances in the home are suspected to be out of compliance with applicable code, so that Client may be informed of problems that are beyond the scope of the weatherization program, and
 - Any weatherization measure to be installed is governed by codes, including license required of installers and permits necessary for the work to be done.
- Acquire all required permits and licenses pertinent to installing weatherization measures. These vary by jurisdiction and it is the responsibility of each sub grantee agency to know what the codes are in each of the areas they work in, as well as what permits and licenses are required in each of the areas they work in.

Allowable Testing/InspectionAllowed with DOE WAP H&S Funds ☐Allowed with Alternative Funds ☐

If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.

Required Occupant EducationConcur with DOE Guidance ☒Alternative Guidance ☐

- Inform client in writing of observed code compliance issues when it results in a deferral.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

Training

- Comprehensive and/or Specific training will be provided during the PY 19' on how to determine what code compliance may be required. Trainers will be sought from the Arkansas Department of Health – State Code. Trainers are certified in various areas (electrical, plumbing, mechanical, and fuel gas)..

6.6 – Electrical**Required Actions**

Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☒	Alternative Funds ☐	
Provide sufficient over-current protection and damming prior to insulating building components containing knob and tube wiring, as required by the AHJ.		
Allowable Actions		
Allowed with DOE WAP H&S Funds ☒	Allowed with Alternative Funds ☐	
Action/Allowability - When the H&S of the occupant/worker(s) is at risk, minor repairs, as defined by the Grantee, are allowed when necessary for weatherization measures. - Arkansas WAP will screen for the presence of knob-and-tube wiring during the application process. - Arkansas will not provide damming for K&T, and will not insulate any space that contains K&T wiring. - If the applicant acknowledges the presence of knob-and-tube wiring at the time of application, the client will be deferred and referred to the appropriate agency for assistance to remedy this problem. - Visual inspection for presence and condition of knob-and-tube wiring. - Check for alterations that may create an electrical hazard. - Voltage drop and voltage detection testing are allowed.		
Prohibited Actions		
Concur with DOE Guidance ☐		
Using DOE WAP H&S funds for major electrical repairs as defined by the Grantee's H&S plan is prohibited		
Define "major" repairs		
Minor electrical repairs are defined as incidental repairs necessary to effectively perform or preserve weatherization materials are allowed. Minor electrical repairs to protect DOE or LIHEAP materials installed may be used to protect the energy saving investment. Typical minor repairs are: - Frayed, loose, or damaged wiring. - Missing junction boxes where wires meet must be installed prior to insulating. - Light fixtures hanging by wire. - Electrical outlet or switch with loose wires or other issues. - Appliances or electrical equipment incorrectly wired or otherwise incorrectly connected to electrical power. - Electrical problems/upgrades necessary to install weatherization measures. Electrical work other than the list above is considered major repairs and is beyond the scope of the WAP. Repair of problems must be by a licensed electrician.		
Required Testing/Inspection		
Concur with DOE Guidance ☐	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☐	Alternative Funds ☐	
Arkansas requires site-specific audits.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐	
If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.		
Required Occupant Education		
Concur with DOE Guidance ☐	Alternative Guidance ☐	

- When electrical issues are the cause of a deferral, provide information to client on over-current protection, overloading circuits, and basic electrical safety/risks.

Training:

- Specific training may be provided on How to identify electrical hazards (if a need is determined) by a licensed electrician.
- Local (or AHJ) code compliance.

6.7 – Fuel Leaks**Required Actions**

Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☒	Alternative Funds ☐	

- When a gas leak is found on the utility side of service, the utility service must be contacted, work must be temporarily halted, and the leak must be repaired before work may proceed.
- Fuel leaks that are the responsibility of the occupant (vs. the utility) must be repaired before installing weatherization measures in the home.

Allowable Actions

Allowed with DOE WAP H&S Funds ☒	Allowed with Alternative Funds ☐
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Action/Allowability

- When a minor gas leak is found on the utility side of service, the utility service must be contacted before work may proceed.
- Fuel leaks that are the responsibility of the client (vs. the utility) must be repaired at the applicant's expense before weatherizing a unit.
- Notify utilities and temporarily halt work when leaks are discovered that are the responsibility of the utility to address.

Prohibited ActionsConcur with DOE Guidance ☐

- Using DOE WAP H&S funds to repair leaks that are the responsibility of the utility to correct is prohibited.
- Using DOE WAP H&S funds for environmental cleanup resulting from bulk fuel leaks is prohibited

Required Testing/Inspection

Concur with DOE Guidance ☐	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☐	Alternative Funds ☐	

- Test exposed gas lines for fuel leaks from utility coupling into, and throughout, the home.
- Conduct sensory inspection on bulk fuels to determine if leaks exist.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐
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If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.

Prohibited Testing/InspectionConcur with DOE Guidance ☐

Using DOE WAP H&S funds for environmental testing of soil or water is prohibited.

Required Occupant Education

Concur with DOE Guidance ☐	Alternative Guidance ☐
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Client Education

Inform clients in writing if fuel leaks are detected.

Training

- Specific training may be provided on Fuel leak testing (if a need is determined) by a licensed professional.

6.8 – Gas Ovens/Stovetops/Ranges**Allowable Actions**

Allowed with DOE WAP H&S Funds ☐

Allowed with Alternative Funds ☐

- When testing indicates a problem, entities may perform standard maintenance on or repair as cooktops and ovens.
- Replacement is not allowed.

Required Testing/Inspection

Concur with DOE Guidance ☒

Alternative Guidance ☐

Results in Deferral/Referral ☐

DOE WAP H&S Funds ☐

Alternative Funds ☐

- Test gas ovens for CO.
- Inspect cooking burners and ovens for operability and flame quality.

Define action levels for oven CO testing and resulting actions

Define action levels for oven CO testing and resulting actions.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds ☐

Allowed with Alternative Funds ☐

If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.

Required Occupant Education

Concur with DOE Guidance ☐

Alternative Guidance ☐

When a health or safety hazard is detected, inform the client and address the hazard according to protocol.

Client Education

Inform clients of the importance of using exhaust ventilation when cooking and the importance of keeping burners clean to limit the production of CO.

Training

- Specific training may be provided on testing techniques (if a need is determined) by a licensed professional.
- CO action levels are found in section 7 – Technical Standards within the AWAP Subgrantee Operations Manual and on the Health & Safety (WAP 10) form.

6.9 – Hazardous Materials**Required Actions**

Concur with DOE Guidance ☒

Alternative Guidance ☐

Results in Deferral/Referral ☐

DOE WAP H&S Funds ☒

Alternative Funds ☐

- Hazardous Waste Materials generated by weatherization work (e.g., refrigerant, asbestos, lead, mercury, CFL lighting bulb/ballasts, etc.) must be disposed of according to all local and federal laws, regulations, and guidelines, as applicable. Costs specifically related to disposal may be charged as a H&S expense. - Subgrantees must document disposal requirements in contract language with the responsible party. Limited removal of pollutants that pose a risk to workers is required (e.g., flammable liquids, hazardous chemicals, and other air pollutants) as defined the Grantee's H&S Plan. - If removal cannot be performed or is not allowed by the occupant, the unit must be deferred.		
Define "limited" removal of pollutants		
Define "limited" removal of pollutants using a quantifiable methodology.		
Allowable Actions		
Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐	
Action/Allowability - 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. - Disposal of refrigerants must be in accordance with EPA's safe disposal requirements. - WAP agency must have signed agreement with the company providing refrigerator/air conditioners stating guaranteeing removal of old appliances and proper disposal of refrigerants according to EPA requirements. - Document proper disposal requirements in contract language with responsible party. - Refer to <i>Lead</i> and <i>Asbestos</i> sections for more information on those topics.		
Prohibited Actions		
Concur with DOE Guidance ☐		
Using DOE WAP H&S funds for Lead, Asbestos, and Radon abatement is prohibited.		
Required Testing/Inspection		
Concur with DOE Guidance ☐	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☐	Alternative Funds ☐	
- Not applicable. - Refer to Lead and Asbestos sections for more information on those topics.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐	
If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.		
Prohibited Testing/Inspection		
Concur with DOE Guidance ☐		
Using DOE WAP H&S funds for any testing for hazardous materials other than that specifically permitted in the asbestos, lead, and radon sections of this document is prohibited.		
Required Occupant Education		
Concur with DOE Guidance ☐	Alternative Guidance ☐	
Inform client in writing of hazards associated with hazardous waste materials being generated/handled in the home.		
Training		
- Appropriate Personal Protective Equipment (PPE) for working with hazardous waste materials. - Disposal requirements and locations. - Health and environmental risks related to hazardous materials. - EPA-approved section 608 type I or universal certification.		

6.10 - Injury Prevention of Occupants**Allowable Actions**Allowed with DOE WAP H&S Funds ☐Allowed with Alternative Funds ☐**Action/Allowability**

- When necessary to effectively weatherize the home, workers may make minor repairs and installations, as defined by the Grantee; otherwise, these measures are not allowed. Minor repairs are defined in the AWAP Subgrantee Operations manual.

Prohibited ActionsConcur with DOE Guidance ☐Using DOE WAP H&S funds for **major** repairs, as defined by the Grantee's H&S Plan is prohibited**Define "major" repairs**

- If crews encounter a situation where a staircase is deemed unsafe, for example, and the staircase is necessary to reach the area where the crews need to perform the weatherization work, and repairing the staircase requires only minor repair work and installation measures, crews shall perform the minor repair work so that they may safely perform the weatherization work to the home.
- Injury Prevention Issues are addressed in the Client Education Checklist and Health and Safety Checklist.
- A copy of the Client Education Checklist is placed in the clients' file.
- Deferral Policy: If the repair work required is deemed to be beyond the scope of the DOE WAP (major repair is required such as rebuilding an entire staircase), the weatherization work shall be deferred until the homeowner has satisfactorily installed the required repair(s). Follow all appropriate Deferral and Referral policies and protocols, if determined to be beyond the scope of the DOE WAP.

Required Testing/InspectionConcur with DOE Guidance ☒Alternative Guidance ☐Results in Deferral/Referral ☐DOE WAP H&S Funds ☒Alternative Funds ☐**Testing**

Inspect for dangers that would prevent weatherization.

Allowable Testing/InspectionAllowed with DOE WAP H&S Funds ☐Allowed with Alternative Funds ☐

If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.

Required Occupant EducationConcur with DOE Guidance ☐Alternative Guidance ☐**Client Education**

If conditions will not be repaired, inform client in writing of observed hazards and associated risks.

Training

- Guidance provided to subgrantees regarding allowable injury-related repairs: Minor repairs and installation may be conducted only, when necessary, to effectively weatherize the home; otherwise, these measures are not allowed.
- Comprehensive and/or Specific training may be provided on Identifying Hazards. Training will be provided by OSHA representatives.

6.11 – Lead-Based Surface Coverings (Paint, Varnishes, Roofing, etc.)**Required Actions**Concur with DOE Guidance ☒Alternative Guidance ☐Results in Deferral/Referral ☐DOE WAP H&S Funds ☒Alternative Funds ☐

- Subgrantees must comply with EPA's Lead; Renovation, Repair and Painting Program (RRP) rules when working in pre-1978 housing unless testing confirms the work area to be lead free. This includes, but is not limited to:
 - Client file documentation including the Certified Renovator's certification; any training provided on-site; description of specific actions taken; lead testing and assessment documentation; and photos of site and containment set up. Include the location of photos referenced if not in file.
 - Certification and training requirements of the RRP rule.
 - Job site set up and cleaning verification by a Certified Renovator.
- Only those costs directly associated with lead safe work practices for surfaces directly disturbed during weatherization activities are allowable WAP H&S expenses.

Allowable Actions

Allowed with DOE WAP H&S Funds ☒

Allowed with Alternative Funds ☐

Action/Allowability

- Crews must follow EPA's Lead; Renovation, Repair and Painting Program (RRP) when working in pre-1978 housing unless testing confirms the work area to be lead free.
- Job site set up and cleaning verification is required by a Certified Renovator.
- Only those costs directly associated with the testing and lead safe practices for surfaces directly disturbed during weatherization activities are allowable.
- Deferral is required when the extent and condition of lead-based paint in the house would potentially create further H&S hazards.

Safe Work Protocol

Program operators will be required to show that all Lead Based Paint protocols: information sharing, Lead safe work practices, proper equipment, and so forth are up to date and in compliance to all regulations whatever they turn out to be. Those programs that are not in compliance, and fail to comply once identified, will face the most serious sanctions that can be leveled: reduced allocation to start with, loss of contract if necessary. Special attention will be aimed at those programs failing to meet requirements in the area of Lead Safe Work Practices since it poses such tangible consequences for the households that are served.

Workers must:

- Test areas where weatherization work is likely to occur.
- Follow the proper DOE LSW protocols, OSHA regulations and EPA regulations in all pre-1978 homes.
- Don't just assume that all mobile homes are categorically exempt. Any home built before 1978, or any mobile home remodeled using paints and varnishes prior to 1978, may contain lead-based paint. These paints should be considered "guilty until proven innocent" by way of testing.
- All sub grantees have applied for and received Lead Renovator Firm status. All evaluators (inspectors) have acquired Lead Renovator (RRP) certification as well as select crew leaders.
- Private contractors must also meet the requirement of having adequate RRP certified employees among their ranks.
- As new contractors apply to work on weatherization projects the EPA requirements are explained during the application process.
- No private contractors will be awarded work on any pre-1978 dwellings that don't meet the EPA rules.
- Private contractors will be required to furnish proof of RRP and Lead Renovator Firm status as a condition of working for the weatherization programs. The monitoring staff will routinely check that documentation is on file at each agency verifying compliance to the EPA rules.
- All weatherization crews working on pre-1978 homes must receive the 8-hour LSW training, or a certified renovator must be assigned to the project and be readily available.
- State Monitors must be Lead Renovator (RRP) and receive the 8-hour LSW training.

The certified renovator must be physically present at the work site while signs are being posted, containment is being established, and the work area is being cleaned after the renovation to ensure that these tasks are performed correctly. Although the certified renovator is not required to be on-site at all times, while the renovation project is ongoing, a certified renovator must nonetheless regularly direct the work being performed by other workers to ensure that the work practices are being followed. When a certified renovator is not physically present at the work site, the workers must be able to contact the renovator immediately by telephone or other mechanism. In addition, the certified renovator must perform the post-renovation cleaning verification.

Prohibited Actions

Concur with DOE Guidance ☐

- Using DOE WAP H&S funds for lead abatement is prohibited.
- Using DOE WAP H&S funds for purchase, resourcing, or maintenance of X-ray Fluorescence (XRF) devices is prohibited.

Allowable Testing/Inspection	
Allowed with DOE WAP H&S Funds ☒	Allowed with Alternative Funds ☐
- Testing to determine the presence of lead in paint that will be disturbed by WAP measure installation is allowed with EPA-approved testing methods. - Testing methods must be economically feasible and justified. - Job site set up and cleaning verification by a Certified Renovator is required.	
Required Occupant Education	
Concur with DOE Guidance ☒	Alternative Guidance ☐
- Follow pre-renovation education provisions for RRP. - The head of household of every home to be weatherized receives the informational pamphlet: "Renovating Right". - The inspector also conducts a client education segment as part of the initial inspection to assure that the occupants are fully aware of the hazards posed by Lead Based Paint exposure. - This procedure is documented by using a signed receipt from the head of household which confirms that the information was not only distributed but also explained. - This receipt is kept in the Client file. - When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.	
<u>Training and Certification Requirements</u> - Comprehensive training is provided to all employees and contractors working on pre-1978 homes must receive training to install measures in a lead-safe manner in accordance with the SWS and EPA protocols, and installation must be overseen by an EPA Certified Renovator. - Grantee Monitors and Inspectors must be Certified Renovators.	
<u>Documentation Requirements</u> Documentation in the client file must include Certified Renovator certification; any training provided on-site; description of specific actions taken; lead testing and assessment documentation; and photos of site and containment set up. Include the location of photos referenced if not in file.	

6.12 – Mold and Moisture	
Allowable Actions	
Allowed with DOE WAP H&S Funds ☒	Allowed with Alternative Funds ☐
Action/Allowability - Limited water damage repairs that can be addressed by weatherization workers are allowed when necessary in order to weatherize the home and to ensure the long-term stability and durability of the measures. - Mold remediation program and funds should not be used to test, abate, remediate, purchase insurance or alleviate existing mold conditions identified during the audit, the work performance period or the quality assurance inspection. - Mold cleanup is not an allowable H&S cost. - Surface preparation where weatherization measures are being installed (e.g., cleaning mold off window trim in order to apply caulk) must be charged as part of the ECM, not to the H&S budget category. - Whenever site conditions permit, cover exposed earth in crawl space with 6 mil (or greater) polyethylene sheeting in a manner consistent with SWS to prevent moisture issues.	
Prohibited Actions	

Concur with DOE Guidance ☐		
- Using DOE WAP H&S funds for mold cleanup is prohibited. - Using DOE WAP H&S funds for window and door replacements is prohibited		
Required Testing/Inspection		
Concur with DOE Guidance ☐	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☐	Alternative Funds ☐	
Testing - Visual assessment including exterior drainage. - Diagnostics such as moisture meters are recommended during pre-weatherization and at the final inspection.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐	
If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.		
Prohibited Testing/Inspection		
Concur with DOE Guidance ☐		
Using DOE WAP H&S funds for mold testing of any type is prohibited.		
Required Occupant Education		
Concur with DOE Guidance ☐	Alternative Guidance ☐	
- Provide client written notification and disclaimer on mold and moisture awareness. - Provide information on importance of cleaning and maintaining drainage systems. - Provide information on proper landscape design and how this impacts site drainage and moisture control. - When deferral is necessary, provide information in writing describing conditions that must be met for weatherization to commence.		
Training Comprehensive and/or Specific training may be sought on mold and moisture, recognizing drainage issues or equivalent.		

6.13 - Occupant Pre-existing or Potential Health Conditions		
Required Actions		
Concur with DOE Guidance ☐	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☐	Alternative Funds ☐	
- When a person’s health may be at risk and/or WAP work activities could constitute an H&S hazard, the occupant is required to take appropriate action based on severity of risk. - Deferral, if occupant risk cannot be mitigated.		
Allowable Actions		
Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐	
If DOE WAP H&S Funds are used for any “allowable” actions, detail them here.		
Required Testing/Inspection		
Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☐	Alternative Funds ☐	

Guidance provided to Subgrantee regarding soliciting the occupants' health and safety concerns related to components of their homes:

At risk is defined as an elderly person (60 or older), disabled person, child (under 19) or other person with medical problems affected by heat, cold, poor air quality or disruption of the home environment.

- Clients are asked to self-report known or suspected health concerns related to their own physical/mental health as part of application for weatherization (WAP 02).

Screen occupants again during audit (see WAP 13).

Guidance provided to Subgrantee regarding determining whether occupants suffer from health conditions that may be negatively affected by the act of weatherizing their home:

- A physician's statement is required for Health & Safety measures if the medical condition is the reason that the measure is being installed.
- Subgrantee is required to follow up on any health issues reported on WAP 02 and WAP 13 prior to weatherization work beginning and prior to developing the work order so that necessary accommodations may be made during the weatherization process.

Guidance provided to Subgrantee regarding dealing with potential health concerns when identified:

- How to assess occupant preexisting conditions and determining what action to take if the home is not deferred.
- Awareness of potential health hazards.
- When a person's health may be at risk and/or the work activities could constitute a health or safety hazard, the occupant at risk will be required to take appropriate action based on severity of risk.
- Temporary relocation of at-risk occupants may be allowed on a case-by-case basis.
- In cases where an occupant is identified as having an allergy to a specific weatherization material, that material will not be installed.
- If comparable alternative materials are available and the occupant has no known allergy to the alternative materials and they meet DOE regulations, crews may substitute the alternative material(s).
- If no safe alternative material meeting DOE standards is available, the measure shall not be installed.
- A request to install alternative materials must be submitted to AEO for approval.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds ☐

Allowed with Alternative Funds ☐

If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.

Required Occupant Education

Concur with DOE Guidance ☐

Alternative Guidance ☐

- Provide client information of any known risks.
- Provide worker contact information so client can inform of any issues.

6.14 – Pests**Required Actions**

Concur with DOE Guidance ☒

Alternative Guidance ☐

Results in Deferral/Referral ☐

DOE WAP H&S Funds ☒

Alternative Funds ☐

Deferral of homes where infestation of pests cannot be reasonably removed or poses H&S concern for workers.

Allowable Actions

Allowed with DOE WAP H&S Funds ☒

Allowed with Alternative Funds ☐

Action/Allowability

- Pest removal is allowed only where infestation would prevent weatherization. Cost limits are found in the Subgrantee Operations manual.
- Screening of windows and points of access and incorporating pest exclusion into air sealing practices to prevent intrusion is allowed.
 - Infestation of pests may be cause for deferral where it cannot be reasonably removed or poses H&S concern for workers. If the cost of removing the pest exceeds the cost limits, it is considered beyond reasonable.

Allowable Testing/InspectionAllowed with DOE WAP H&S Funds ☐Allowed with Alternative Funds ☐**Define Pest Infestation, Thresholds, beyond which Weatherization is Deferred:**

In the instance where pests are excessive or expose the weatherization workers to unsafe or unsanitary conditions and causing a major health and safety risk.

Testing Protocols

Assessment of presence and degree of infestation and risk to worker.

Required Occupant EducationConcur with DOE Guidance ☐Alternative Guidance ☐

- Inform client in writing of observed condition and associated risks.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

Training

How to assess presence and degree of infestation, associated risks, and deferral policy.

6.15 – Radon**Required Actions**Concur with DOE Guidance ☒Alternative Guidance ☐Results in Deferral/Referral ☐DOE WAP H&S Funds ☒Alternative Funds ☐

- Cover exposed dirt floors within the pressure/thermal boundary with a sealed soil gas retarder
- Cover sump well/pits with airtight covers
- Implement ventilation as required by ASHRAE 62.2-2016

Allowable ActionsAllowed with DOE WAP H&S Funds ☐Allowed with Alternative Funds ☐**Action/Allowability Required when applicable):**

- Cover exposed dirt floors within the pressure/thermal boundary with a sealed soil gas retarder
- Cover sump wells/pits with airtight covers
- Implement ventilation as required by ASHRAE 62.2-2016
 - All measures will be installed in accordance with the SWS.

Allowable:

- In homes where radon may be present, work scope may include additional precautionary measures based on EPA Healthy Indoor Environment Protocols for Home Energy Upgrades.
- Other precautions may include, but are not limited to, sealing any observed floor/and or foundation penetrations, isolating the basement from conditioned space, and ensuring crawlspace venting is installed and operable. This could include a second fan.

Prohibited ActionsConcur with DOE Guidance ☐

Using DOE WAP H&S funds for radon mitigation is prohibited.	
Allowable Testing/Inspection	
Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐
If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.	
Required Occupant Education	
Concur with DOE Guidance ☐	Alternative Guidance ☐
Client education is required. Training • Provide all homes EPA’s A Citizen’s Guide to Radon and inform them of radon related risks. • Occupants must sign an informed consent form prior to receiving weatherization services Training and Certification Requirements • AEO has provided Training from the Department of Health at Grants Guidance in June 2022. Radon will also be addressed at our fall training. No certifications are required. • Workers must be trained in proper vapor retarder installation. A zonal map can be located at https://www.epa.gov/sites/default/files/2014-08/documents/arkansas.pdf Documentation Requirements The client acknowledges receipt of Radon Informed Consent Form (WAP 65) and initials the Client Education Checklist (WAP 13). Documentation is maintained in the client file.	

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

Required Actions		
Concur with DOE Guidance ☐	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☐	Alternative Funds ☐	
Install CO alarms in every home where alarms are not present or are inoperable in compliance with ASHRAE 62.2-2016 which references NFPA 720 (note: NFPA 720 has been incorporated into NFPA 72).		
Allowable Actions		
Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐	

Action/Allowability

- Smoke alarms must be installed as described below and per local code requirements.
- CO alarms must be installed where alarms are not present or are inoperable and must be interconnected if required by local code requirements.

Policy for Installation or Replacement of the following:

Smoke Alarms: Must be installed: 1) In sleeping areas; 2) In every room in the path of the means of egress from the sleeping area to the door leading from the sleeping unit; 3) In each story within the sleeping unit, including basements. For sleeping units with split-levels and without an intervening door between the adjacent levels, a smoke alarm installed on the upper level shall suffice for the adjacent lower level provided that the lower level is less than one full story below the upper level.

Carbon Monoxide Alarms: Must be installed in all homes (including all electric) on each level in the proximity of fuel burning devices if they are present. Carbon monoxide detection shall be installed outside of each sleeping area in the immediate vicinity of the bedrooms. Where a fuel-burning appliance is located with

in a bedroom or its attached bathroom, carbon monoxide detection shall be installed within the bedroom.

Fire Extinguishers: Arkansas will not install.

Prohibited Actions

Concur with DOE Guidance ☐

Using DOE WAP H&S funds for replacement of functional smoke or CO alarms that are not beyond the manufacturer's stated lifetime is prohibited.

Required Testing/Inspection

Concur with DOE Guidance ☐

Alternative Guidance ☐

Results in Deferral/Referral ☐

DOE WAP H&S Funds ☐

Alternative Funds ☐

- Check existing alarms for operation.
- Verify operation of installed alarms.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds ☐

Allowed with Alternative Funds ☐

- Check existing alarms for operation.
- Verify operation of installed alarms

Required Occupant Education

Concur with DOE Guidance ☐

Alternative Guidance ☐

- Provide client with verbal and written information on use of devices installed.
- Specific training may be provided on where to install alarms and Local code compliance if a need is determined.

6.17 – Ventilation and Indoor Air Quality**Required Actions**

Concur with DOE Guidance ☐

Alternative Guidance ☐

Results in Deferral/Referral ☐

DOE WAP H&S Funds ☐

Alternative Funds ☐

Install ventilation as required by ASHRAE 62.2 - 2016. If occupant refuses ventilation as required by ASHRAE 62.2, the home must be deferred.

Allowable Actions

Allowed with DOE WAP H&S Funds ☐

Allowed with Alternative Funds ☐

Action/Allowability

- Install ventilation as required by ASHRAE 62.2 - 2016.
- If the ASHRAE normative Appendix A is employed and an existing fan is being replaced or upgraded to meet whole-house ventilation requirements, take actions to prevent zonal pressure differences greater than 3 Pascals across any closed door.
- Implementing ASHRAE 62.2 2016 is not required where acceptable indoor air quality already exists as defined by ASHRAE 62.2 2016.
- Existing fans and blower systems should be updated as required to comply with ASHRAE 62.2 2016 if not adequate.

Required Testing/Inspection

Concur with DOE Guidance ☐	Alternative Guidance ☐	Results in Deferral/Referral ☐
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DOE WAP H&S Funds ☐	Alternative Funds ☐
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- ASHRAE 62.2 evaluation to determine required ventilation.
- Measure fan flow of existing fans and of installed equipment at the conclusion of all weatherization work to verify performance and compliance with ASHRAE 62.2.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐
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If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.

Required Occupant Education

Concur with DOE Guidance ☐	Alternative Guidance ☐
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- Provide client with information on function, use, and maintenance (including location of service switch and cleaning instructions) of ventilation system and components.
- Provide client with equipment manuals for installed equipment.

Training:

Comprehensive and Specific training may be provided on ASHRAE 62.2 (if determined a need) Training includes: proper sizing, evaluation of existing and new systems.

6.18 – Water Heaters

(see Combustion Appliances for combustion related requirements)

Allowable Actions

Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐
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If DOE WAP H&S Funds are used for any "allowable" actions, detail them here.

Required Testing/Inspection

Concur with DOE Guidance ☐	Alternative Guidance ☐	Results in Deferral/Referral ☐
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DOE WAP H&S Funds ☐	Alternative Funds ☐
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- Visual inspection of all water heaters and related piping for safety and leaks
- See Combustion Appliances section for related combustion safety testing requirements.

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐
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If DOE WAP H&S Funds are used for any "allowable" testing, detail them here.

Required Occupant Education

Concur with DOE Guidance ☐	Alternative Guidance ☐
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- Appropriate use and maintenance of units.
- Provide all paperwork and manuals for any installed equipment.
- Where combustion equipment is present, provide combustion safety and hazards information including how to recognize depressurization, dangers of CO poisoning, and fire risks associated with combustion appliance use.

6.19 – Worker Safety

Required Actions

Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☒	Alternative Funds ☐	
Adherence to all federal, state, and local worker safety regulations (e.g., OSHA, EPA).		

Allowable Actions

Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐
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Action/Allowability

- Workers must follow OSHA standards where required and take precautions to ensure the H&S of themselves and other workers.
- All Subgrantees and contractors must maintain compliance with the current OSHA Hazard Communication Standard, including on-site organized Safety Data Sheets (SDS) (formerly called MSDS).
- SDS will be made available wherever workers may be exposed to hazardous materials.
- Weatherization work may be deferred if doing the work would put crews at undue health and safety risk.

Prohibited Actions

Concur with DOE Guidance ☐
Using DOE WAP H&S funds for <i>major</i> repairs as defined by the Grantee's H&S Plan is prohibited.

Define "major" repairs

Define the term "major" repairs using a quantifiable methodology.

Allowable Testing

Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐
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Testing

Grantees must verify that Subgrantees, crews and contractors follow safe work practices.

Training

- Comprehensive training on use and importance of PPE was provided. If Specific training is determined, additional training will be provided during PY 23. Other Specific training could include:
- Safety training appropriate for job requirements.
 - All crew leaders, energy auditors, inspectors, and AEO field staff must complete OSHA 10 training.
 - Ongoing training as required in Hazard Communication Program.

Verifying safe work practices and policy for in-progress monitoring:

By conducting a methodological audit/inspection of the building, performing safety and diagnostic tests, and by observing the retrofit work; to ensure the completion, appropriateness and quality of the work providing for the safety, comfort, and energy savings of the building occupants.

Policy

Technical monitor will:

- Verify the work performed against the work plan, specifications and standards.
- Perform building diagnostics, records/reports findings and concerns, and specifies corrective actions

6.X – (Insert Additional H&S Items for Use of DOE WAP H&S funds)**Required Actions**

Concur with DOE Guidance ☐	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☐	Alternative Funds ☐	

Insert required item text

Allowable Actions

Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐
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If DOE WAP H&S Funds are used for any “allowable” actions, detail them here.

Prohibited ActionsConcur with DOE Guidance ☐

What is prohibited

Required Testing/Inspection

Concur with DOE Guidance ☐	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☐	Alternative Funds ☐	

Insert required item text

Allowable Testing/Inspection

Allowed with DOE WAP H&S Funds ☐	Allowed with Alternative Funds ☐
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If DOE WAP H&S Funds are used for any “allowable” testing, detail them here.

Prohibited Testing/InspectionConcur with DOE Guidance ☐

What is prohibited

Required Occupant Education

Concur with DOE Guidance ☐	Alternative Guidance ☐
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Insert required item text