

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

Grantee Name

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.

The subgrantees must get state approval to spend more than the average H&S cost per unit from the attached spreadsheet. Approval is based on whether the subgrantee is not over their approved H&S allocation.

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%.

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.

No incidental repair measures will be assigned as H&S measures.

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:*

H&S Measure Matrix			
Double Click To Open For Editing			
Cells This Shade Auto-Calculate			
Measure	Average Cost	Frequency Installed/Completed	Auto-Calculated Average Cost
Ventilation	\$190.00	84.6%	\$160.78
Plumbing	\$0.00	0.0%	\$0.00
Furnace or WH Repair	\$0.00	0.0%	\$0.00
Co meters	\$92.00	69.2%	\$63.69
Dryer vents	\$19.00	32.3%	\$6.14
Grills	\$0.00	0.0%	\$0.00
Poly	\$65.00	26.2%	\$17.00
Smoke alarms	\$69.00	80.0%	\$55.20
labor	\$327.00	100.0%	\$327.00
Roof Coating	\$180.00	1.5%	\$2.70
Sump Cover	\$22.00	10.8%	\$2.37
Other	\$42.00	13.9%	\$5.82
Other Electrical	\$13.00	7.7%	\$1.00
Furnace Replacement	\$0.00	0.0%	\$0.00
Water Heater Replacement	\$0.00	0.0%	\$0.00
	\$0.00	0.0%	\$0.00
	\$0.00	0.0%	\$0.00
	\$0.00	0.0%	\$0.00
	\$0.00	0.0%	\$0.00
	\$0.00	0.0%	\$0.00
	\$0.00	0.0%	\$0.00
Total Average H&S Cost Per Unit			\$641.69
Enter Estimated Production (Annual File: IV.2 WAP Production Schedule)			198
Enter Estimated Program Operations Budget (Annual File - Budget)			\$1,876,365.00
H&S Budget (Total Average H&S Cost Per Units * Estimated Production)			\$127,055.04
Suggested H&S Budget Request			6.771%

- 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

Clients are asked at the time of the interview during the initial audit. Documented on the Health and Safety Inspection and Release form.

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

Clients are asked at the time of the interview during the initial audit. Documented on the Health and Safety Inspection and Release form.

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

After discussing with client, they may be asked to occupy a part of the house away from the work that is being done or they may be asked to vacate the house while the work is being done. In a serious enough case, the job may be deferred

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 or left in place after weatherization in manufactured homes must meet these standards, including secondary heating sources. 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 ☒
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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:

- “Red tagged,” inoperable, or nonexistent primary heating system may be replaced, repaired, or installed consistent with this guidance.
- Use proper sizing protocols (Heatloss calculation in WxPro Software which is based on Manual J.) based on post-weatherization housing characteristics, including installed mechanical ventilation, when installing or replacing a heating appliance.
- Unsafe primary units must be repaired or replaced, or deferral is required.
- See Hazardous Materials Disposal section for more information.
- There must be an identified and documented imminent H&S hazard (e.g. cracked heat exchanger) that necessitates the system replacement.

Almost all our heating system work is done with LIHEAP Emergency Furnace funds prior to weatherization. DOE funds are only used on clients that do not qualify for LIHEAP.

See The 2025 Policies and Procedures manuals for more information on heating system policies.

Prohibited Actions

Concur with DOE Guidance ☒

- Replacement or installation of secondary units is not allowed with DOE funds.

Air Conditioning is not allowed with DOE funds

Required Testing/Inspection

Concur with DOE Guidance ☒

Alternative Guidance ☐

- Verify that primary heating systems are present, operable, and performing correctly.
- Conduct combustion appliance testing and visual inspection of all combustion appliances and their related venting.
- Depressurization and spillage testing is required for all Category 1 appliances pre- and post-weatherization and before leaving the home on any day when work has been done that could affect draft (e.g., air or duct sealing, adding exhaust ventilation).
- CO testing is required for all combustion appliances, regardless of venting type.
- Verify proper clearances for all combustion venting types
- Visually inspect the entirety of solid fuel-fired appliance installations (e.g., wood stoves, coal stoves, pellet stoves, fireplaces) including the venting system to ensure it adheres to the applicable code or local authority having jurisdiction. Appliances must be inspected pre- and post-weatherization.
- Conduct pre- and post- weatherization worst case CAZ depressurization testing in spaces having a fireplace or woodstove. Since there is no consensus method for verifying safe operation of fireplaces and woodstoves, Grantees can propose testing policies and limits. If the Grantee does not propose a policy and fireplaces or woodstoves are left operational, the vent must meet national or local codes, or the home cannot be weatherized.
- Safety inspections related to space heaters, fireplaces, and woodstoves must include, but not be limited to, verification of adequate floor protection, and code-compliant clearances to walls and other combustible materials.

Grantee Combustion Testing Action Levels

Action levels in the BPI 1200 standard are followed. See attached Furnace Diagnostic testing form

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 ☐

A copy of our client education book is attached to the SF424.

- Appropriate use and maintenance of units.
- Provide all paperwork and manuals for any equipment installed by weatherization.
- 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 combustion safety and hazards information including how to recognize depressurization, dangers of CO poisoning, and fire risks associated with combustion appliance use.
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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

- Assume asbestos is present in suspect covering materials.
- When suspected friable ACM is present, take precautionary measures as if it is asbestos unless testing determines otherwise.
- Grantee may allow removal or encapsulation by an appropriately trained professional on a case-by-case basis. Grantees will look at the savings that would be lost by deferring the home compared to the cost of the removal.
- Charge only those costs directly associated with the testing, encapsulation, or removal to the H&S budget category.
- When deferral is necessary due to asbestos, occupant must provide documentation that a certified professional performed the remediation before work continues.

Asbestos or presumed asbestos will not be disturbed during weatherization work.

- The existence of asbestos siding that is in good condition does not prevent installing dense-pack insulation from the exterior.
- Siding may be removed and reinstalled in order to perform the ECM, and the associated costs may be charged as part of the ECM.
- General abatement of asbestos siding or replacement with new siding is not an allowable H&S cost.
- When vermiculite is present, assume it contains asbestos unless testing determines otherwise.
- Use proper respiratory protection while in areas containing vermiculite.
- Removal is not allowed.
- When deferral is necessary due to asbestos, occupant must provide documentation that a certified professional performed the remediation before work continues

Grantee Blower Door Testing Policy When Suspected ACM Exists

- Blower door testing is allowed where friable suspected ACM is present unless the suspected ACM is in such condition that it cannot be contained and may be introduced into the living space of the home. Vermiculite in attics is not a reason to not do blower door testing. Workers should use PPE and access should be from outside when working in attics with vermiculite. Air sealing should be done before doing a blower door test. If inside access is necessary, containment must be used. If the ACM is in such a condition that blower door testing cannot be done, the home must be deferred. State Health Department Asbestos trainers have agreed with this policy.

Allowable Actions

Allowed with DOE WAP H&S Funds ☒		Allowed with Alternative Funds ☒	
Testing, encapsulation, or removal are allowed.			
Prohibited Actions			
Concur 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/Inspection			
Concur with DOE Guidance ☐		Alternative Guidance ☒	
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/Inspection			
Allowed with DOE WAP H&S Funds ☒		Allowed with Alternative Funds ☒	
Testing is allowed. Asbestos Hazard Emergency Response Act of 1986 (AHERA) sample collection and testing must be conducted by a certified tester.			
Required Occupant Education			
Concur with DOE Guidance ☐		Alternative Guidance ☐	
- Formally notify the occupant, and landlord if applicable, in writing: - of suspected ACMs that are present and what precautions will be taken to ensure the occupants' and workers' safety during weatherization; - of results if testing was performed; - not to disturb suspected ACM; - When deferral is necessary due to asbestos, occupant, or landlord if applicable, must provide documentation that a certified professional performed the remediation before work continues.			

6.3 – Biologicals and Unsanitary Conditions			
Required Actions			
Concur with DOE Guidance ☒		Alternative Guidance ☐	
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 Actions			
Allowed with DOE WAP H&S Funds ☒		Allowed with Alternative Funds ☒	
Remediation of conditions that may lead to or promote biological concerns and unsanitary conditions is allowed.			
Required Testing/Inspection			
Concur with DOE Guidance ☒		Alternative Guidance ☐	
DOE WAP H&S Funds ☒		Alternative Funds ☒	
Sensory inspection of interior, exterior, attics, and subspaces of the dwelling.			
Prohibited Testing/Inspection			
Concur with DOE Guidance ☒			
DOE WAP H&S funds may not be used for testing of materials for biological contaminants.			
Required Occupant Education			
Concur with DOE Guidance ☒		Alternative Guidance ☐	
Inform occupant in writing of observed biological and unsanitary 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 ☒

Minor or allowable structure and roofing repairs must be tied to a measure being done during the weatherization or to protect existing insulation and other energy related parts of the home. Grantees will look at the savings that would be lost by deferring the home compared to the cost of the repair.

Prohibited Actions

Concur 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

The cost must not go above the H&S average per home without state approval.

Required Testing/Inspection

Concur 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/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/evaluation of structural materials by a third-party is prohibited.

Required Occupant Education

Concur with DOE Guidance ☒

Alternative Guidance ☐

Notify occupant in writing of structurally compromised areas.

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 Actions

Concur with DOE Guidance ☒

- Using DOE WAP H&S funds for correction of preexisting code compliance issues not directly related to the installation of specific weatherization measures in the home is prohibited.
- Using DOE WAP funds for work on condemned properties and properties where H&S conditions exist that cannot be corrected under this guidance is prohibited

Required Testing/Inspection

Concur with DOE Guidance ☒

Alternative Guidance ☐

Results in Deferral/Referral ☐

DOE WAP H&S Funds ☒

Alternative Funds ☒

Visual 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.

Required Occupant Education

Concur with DOE Guidance ☒	Alternative Guidance ☐
Inform occupant in writing of observed code compliance issues when it results in a deferral.	

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 ☒	
Minor electrical repairs must be tied to a measure being done during the weatherization or to protect the health and safety of the occupants or crews. The cost must not go above the H&S average per home without state approval. Grantees will look at the savings that would be lost by deferring the home compared to the cost of the repair		
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		
The cost must not go above the H&S average per home without state approval.		
Required Testing/Inspection		
Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☒	Alternative Funds ☒	
- Visual inspection for presence and condition of knob-and-tube wiring. - Evaluate knob-and-tube wiring for safety prior to work. - Check for alterations that may create an electrical hazard.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds ☒	Allowed with Alternative Funds ☒	
Voltage drop and voltage detection testing are allowed		
Required Occupant Education		
Concur with DOE Guidance ☒	Alternative Guidance ☒	
- Provide occupant with written documentation of any electrical hazards identified that will not be addressed by weatherization - Provide information to occupant on over-current protection, overloading circuits, and basic electrical safety/risks if conditions warrant.		

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 ☒	
Fuel leaks that are the responsibility of the client (vs. the utility) must be repaired before weatherizing a unit. These would typically be funded through the LIHEAP Emergency Furnace grant in a LIHEAP client. DOE H&S funds would be used in the case of a client that does not qualify for LIHEAP but does qualify for DOE Weatherization.			
Prohibited Actions			
Concur 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 ☒	
DOE WAP H&S Funds ☒		Alternative Funds ☒	
- Test all exposed gas lines, fittings, valves, and connections for fuel leaks from utility connection to the appliance throughout the home. - Test all gas appliances for fuel leaks at all connections, valves, fittings, and burners. - Conduct sensory inspection of all bulk fuels lines and storage tanks to determine if leaks exist.			
Allowable Testing/Inspection			
Allowed with DOE WAP H&S Funds ☒		Allowed with 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.			
Prohibited Testing/Inspection			
Concur 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 ☒	
Inform occupants in writing of fuel leak testing results, including specific location if fuel leaks are detected.			

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 gas cooktops and ovens. If repairs are not done, the client must be informed in writing about the problem.		
Prohibited Actions		
Concur with DOE Guidance ☐		
• 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. • Grantee H&S plan must define action levels and resulting actions. • Visually inspect cooking burners and ovens for operability and flame quality.		
Define action levels for oven CO testing and resulting actions		
We follow BPI 1200 standard action levels. See attached Furnace diagnostic testing form.		
Allowable Testing/Inspection		
Allowed with DOE WAP H&S Funds ☒	Allowed with Alternative Funds ☒	

• Test gas ovens for CO. • Grantee H&S plan must define action levels and resulting actions. • Visually inspect cooking burners and ovens for operability and flame quality.	
Required Occupant Education	
Concur with DOE Guidance ☒	Alternative Guidance ☒
Inform occupants of the importance of using exhaust ventilation when cooking and the importance of keeping burners and broilers clean to limit the production of CO.	

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		
The cost must not go above the H&S average per home without state approval.		
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 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 ☒	
Sensory 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 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 occupant in writing of hazards associated with hazardous waste materials being generated/handled in the home.
 - Inform occupant in writing of observed hazardous condition and associated risks.
 - Provide occupant written materials on safety issues and proper disposal of household pollutants.
- Documented on the Health and Safety Inspection and Release form.
See ND Client Ed book attached to the SF424

6.10 - Injury Prevention of Occupants

Allowable Actions

Allowed with DOE WAP H&S Funds ☒

Allowed with Alternative Funds ☒

When necessary to effectively perform a health and safety measure that is listed on ECM-GHW-H&S-IRM, workers may make minor repairs and installations. Common minor repairs include: patching a sewer leak, minor ventilation repair, holes in mobile home floors where insulation is present. Most minor repairs have a cost of less than \$300 with labor.

Prohibited Actions

Concur 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

The cost must not go above the H&S average per home without state approval.

Required Testing/Inspection

Concur with DOE Guidance ☒

Alternative Guidance ☐

Results in Deferral/Referral ☐

DOE WAP H&S Funds ☒

Alternative Funds ☒

Visually inspect for dangers that would prevent weatherization.

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 ☐

If identified hazardous conditions will not be corrected during weatherization, inform occupant in writing of observed hazards and associated risks utilizing the "Hazard Identification Notification Form" required by WPN 22-7.

Documented on the Health and Safety Inspection and Release form.

See ND Client Ed book attached to the SF424

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 ☒
Following the EPA RRP rules is allowable.	
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.	
Required Occupant Education	
Concur with DOE Guidance ☒	Alternative Guidance ☒
Follow pre-renovation education requirements per EPA RRP rules.	

6.12 – Mold and Moisture		
Allowable Actions		
Allowed with DOE WAP H&S Funds ☒	Allowed with Alternative Funds ☒	
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. - Source control (i.e. correction of moisture and mold creating conditions) is allowed when necessary in order to weatherize the home and to ensure the long-term stability and durability of the measures. Source control is independent of latent damage and related repairs. - 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. - Approved H&S measures are defined by the Grantee in the ECM-GHW-H&S-IRM lists 2025 attachment to the 2025 State Plan		
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 ☐	
Visual assessment for moisture or mold damage including exterior drainage.		
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 occupant written notification of identified mold/moisture hazards and information regarding the associated hazard. Documented on the Health and Safety Inspection and Release form. See ND Client Ed book attached to the SF424	

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 ☒	
•		
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 ☐	
- Inform occupant in writing of any known risks and provide pre-weatherization screening form. - Provide occupant with Subgrantee point of contact information in writing. - Documented on the Health and Safety Inspection and Release form. - See ND Client Ed book attached to the SF424		

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 ☐	
Pest removal is allowed only where infestation would prevent weatherization Screening of windows and points of access and incorporating pest exclusion into air sealing practices to prevent intrusion is allowed.		

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 ☒
Inform occupant in writing of observed conditions and associated risks. Pest removal is allowed only where infestation would prevent weatherization. • Screening of windows and points of access and incorporating pest exclusion into air sealing practices to prevent intrusion is allowed.	

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 Actions		
Allowed with DOE WAP H&S Funds ☒	Allowed with Alternative Funds ☒	
Sealing any observed floor and/or foundation penetrations, isolating the basement from the conditioned space, and ensuring crawl space venting is installed.		
Prohibited Actions		
Concur 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 ☐	
Testing is not allowed but Sub-grantees may direct clients to the State Health Department which has testing available		
Required Occupant Education		
Concur with DOE Guidance ☐	Alternative Guidance ☒	
• Provide all occupants 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.		

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 and Smoke 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 ☒	
Fire Extinguishers: Where solid fuel burning equipment is present, fire extinguishers may be provided as an allowable H&S measure.		
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 ☐
Verify operation and age of installed alarms.		
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 occupant with verbal and written information on use of newly installed devices and the potential risks of not properly maintaining these devices.		

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. We have been given a variance on section 6.5.2 to use our duct leakage standards. We also have been given an exception to section 6.4 to use our Worst Case Spillage Test in place of the requirements of this section. We will meet section 6.1 and 6.1.1 by using blower door guided air sealing and infrared cameras. We will notify DOE of any adoptions of addendums to the Standard.		
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 ☒
- ASHRAE 62.2 evaluation to determine required post-weatherization ventilation. - Measure fan flow of existing fans and of installed equipment to verify performance.		
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 occupant with information on function, use, and maintenance (including location of service switch and cleaning instructions) of ventilation system and components. - Provide occupant with equipment manuals for installed equipment. - Include disclaimer that ASHRAE 62.2 does not account for high polluting sources or guarantee indoor air quality.		

6.18 – Water Heaters (see Combustion Appliances for combustion related requirements)	
Allowable Actions	
Allowed with DOE WAP H&S Funds ☒	Allowed with Alternative Funds ☒

Repair and replacement is allowed. BPI 1200 Standard action levels apply.		
Required Testing/Inspection		
Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
DOE WAP H&S Funds ☒		Alternative Funds ☒
- 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 ☒
Diagnostic testing is allowed.		
Required Occupant Education		
Concur with DOE Guidance ☒		Alternative Guidance ☒
- 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 ☐
If DOE WAP H&S Funds are used for any “allowable” actions, detail them here.		
Prohibited Actions		
Concur 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		
The cost must not go above the H&S average per home without state approval.		
Allowable Testing		
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.		

6.20 - Infectious Disease Preparedness and Response

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 ☐
Please see the ND – COVID – Considerations-for- Fieldwork document attached	

Prohibited Actions

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

Prohibited Testing/Inspection

Concur with DOE Guidance ☐
What is prohibited

Required Occupant Education

Concur with DOE Guidance ☐	Alternative Guidance ☐
Please see the ND Client Procedures – 6-15-20 document attached	