**Weatherization Grantee Health and Safety Plan *Optional Template***

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| **Policy Submitted with Plan** | |
| **1.0 – General Information** | |
| *Grantees are encouraged to enter additional information here that does not fit neatly in one of the other sections of this document.* | |
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| **2.0 – Budgeting** | |
| *Grantees are encouraged to budget Health & Safety (H&S) costs as a separate category and, thereby, exclude such costs from the average cost per unit cost (ACPU) limitation. This separate category also allows these costs to be isolated from energy efficiency costs in program evaluations. Grantees are reminded that, if H&S costs are budgeted and reported under the program operations category rather than the H&S category, the related H&S costs must be included in the calculation of the ACPU and cost-justified through the approved energy audit.* | |
| Select which option is used below. | |
| Separate Health and Safety Budget | Contained in Program Operations |
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| **3.0 – Health and Safety Expenditure Limits** | |
| *Pursuant to* [*10 CFR 440.16(h)*](https://www.ecfr.gov/cgi-bin/text-idx?SID=f78e4ee30175d8063f1e1ce6eb728f94&mc=true&node=se10.3.440_116&rgn=div8)*, Grantees must set H&S expenditure limits for their Program, providing justification by explaining the basis for setting these limits and providing related historical experience.*  *Low percentages should include a statement of what other funding is being used to support H&S costs, while larger percentages will require greater justification and relevant historical support. It is possible that these limits may vary depending upon conditions found in different geographical areas. These limits must be expressed as a percentage of the ACPU. For example, if the ACPU is $5,000, then an average expenditure of $750 per dwelling would equal 15 percent expenditures for H&S.*  *15 percent is not a limit on H&S expenditures but exceeding this amount will require ample justification. These funds are to be expended by the Program in direct weatherization activities. While required as a percentage of the ACPU, if budgeted separately, the H&S costs are not calculated into the per-house limitation. DOE strongly encourages using the table below in developing justification for the requested H&S budget amount. Each H&S measure the Grantee anticipates addressing with H&S funds should be listed along with an associated cost for each measure, and by using historical data the estimated frequency that each measure is installed over the total production for the year.*  *It is also 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* | |
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| **4.0 – Incidental Repair Measures** | |
| *If Grantees choose to identify any H&S measures as incidental repair measures (IRMs), they must be implemented as such under the Grantee’s weatherization program in all cases – meaning, they can never be applied to the H&S budget category. In order to be considered IRMs, the measure must fit the following definition and be cost justified along with the associated efficiency measure;*  *Incidental Repairs means those repairs necessary for the effective performance or preservation of weatherization materials. Such repairs include, but are not limited to, framing or repairing windows and doors which could not otherwise be caulked or weather-stripped and providing protective materials, such as paint, used to seal materials installed under this program. (*[*10 CFR 440 “Definitions”*](https://www.ecfr.gov/cgi-bin/text-idx?SID=4a6e2ea3b0878fbbaec0c220dabdd3a4&mc=true&node=pt10.3.440&rgn=div5)*)* | |
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| **5.0 – Deferral/Referral Policy** | |
| *Deferral of services may be necessary if H&S issues cannot be adequately addressed according to WPN 17-07 guidance. The decision to defer work in a dwelling is difficult but necessary in some cases. This does not mean that assistance will never be available, but that work must be postponed until the problems can be resolved and/or alternative sources of help are found. If, in the judgment of the auditor, any conditions exist which may endanger the health and/or safety of the workers or occupants, the unit should be deferred until the conditions are corrected. Deferral may also be necessary where occupants are uncooperative, abusive, or threatening. Grantees must be specific in their approach and provide the process for clients to be notified in writing of the deferral and what conditions must be met for weatherization to continue. Grantees must also provide a process for the client to appeal the deferral decision to a higher level in the organization.* | |
| Grantee has developed a comprehensive written deferral/referral policy that covers both H&S, and other deferral reasons? | |
| Yes  No | |
| Where can this deferral/referral policy be accessed? | |
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| **6.0 – Hazard Identification and Notification Form(s)** | |
| *Documentation forms must be developed that include at a minimum: the client's name and address, dates of the audit/assessment and when the client was informed of a potential H&S issue, a clear description of the problem, a statement indicating if, or when weatherization could continue, and the client(s) signature(s) indicating that they understand and have been informed of their rights and options.* | |
| Documentation Form(s) have been developed and comply with guidance? | |
| Yes  No | |

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| **7.0 – Health and Safety Categories** |
| *For each of the following H&S categories identified by DOE:*   * *Explain whether you concur with existing guidance from WPN 17-07 and how that guidance will be implemented in your Program, if you are proposing an alternative action/allowability, or if the identified category will not be addressed and will always result in deferral. Alternatives must be comprehensively explained and meet the intent of DOE guidance.* * *Where an Action/Allowability or Testing is “required” or “not allowed” through WPN 17-07, Grantees must concur, or choose to defer all units where the specific category is encountered.* * *“Allowable” items under WPN 17-07 leave room for Grantees to determine if the category, or testing, will be addressed and in what circumstances.* * *Declare whether DOE funds or alternate funding source(s) will be used to address the particular category.* * *Describe the explicit methods to remedy the specific category.* * *Describe what testing protocols (if any) will be used.* * *Define minimum thresholds that determine minor and major repairs* * *Identify minimum documentation requirements for at-risk occupants* * *Discuss what explicit steps will be taken to educate the client, if any, on the specific category if this is not explained elsewhere in the Plan. Some categories, like mold and moisture, require client education.* * *Discuss how training and certification requirements will be provided for the specific category. Some categories, like Lead Based Paint, require training.* * *Describe how occupant health and safety concerns and conditions will be solicited and documented*   *Grantees may include additional H&S categories for their particular Programs. Additional categories must include, at a minimum, all of the same data fields as the DOE-provided categories. Two additional tables have been created to utilize.* |

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| **7.1 – Air Conditioning and Heating Systems** | | | | | | |
| **Concurrence, Alternative, or Deferral** | | | | | | |
| Concurrence with Guidance | | Alternative Guidance | | | Results in Deferral | |
| Air Conditioning Unallowable Measure  Heating Unallowable Measure | | | | | | |
| **Funding** | | | | | | |
| DOE | LIHEAP | | State | Utility | | Other |
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| **How do you address unsafe or non-functioning primary heating/cooling systems?** | | | | | | |
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| **How do you address unsafe or non-functioning secondary heating systems, Including unvented secondary space heaters?** | | | | | | |
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| **Indicate Documentation Required for At-Risk Occupants** | | | | | | |
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| **Testing Protocols** | | | | | | |
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| **Client Education** | | | | | | |
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| **Training** | | | | | | |
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| **7.2 - Asbestos - All** | | | | | | |
| **What is the blower door testing policy when suspected Asbestos Containing Material (ACM) is identified?** | | | | | | |
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| **7.2a – Asbestos - in siding, walls, ceilings, etc.** | | | | | | |
| **Concurrence, Alternative, or Deferral** | | | | | | |
| Concurrence with Guidance | | Alternative Guidance | | | Results in Deferral | |
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| **Funding** | | | | | | |
| DOE | LIHEAP | | State | Utility | | Other |
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| **How do you address suspected ACM’s in siding, walls, or ceilings that will be disturbed through the course of weatherization work?** | | | | | | |
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| **Testing Protocols** | | | | | | |
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| **Client Education** | | | | | | |
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| **Training and Certification Requirements** | | | | | | |
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| **7.2b – Asbestos - in vermiculite** | | | | | | |
| **Concurrence, Alternative, or Deferral** | | | | | | |
| Concurrence with Guidance | | Alternative Guidance | | | Results in Deferral | |
| **Funding** | | | | | | |
| DOE | LIHEAP | | State | Utility | | Other |
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| **How do you address suspected ACM’s in vermiculite that will be disturbed through the course of weatherization work?** | | | | | | |
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| **Testing Protocols** | | | | | | |
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| **Client Education** | | | | | | |
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| **Training and Certification Requirements** | | | | | | |
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| **7.2c – Asbestos - on pipes, furnaces, other small covered surfaces** | | | | | | |
| **Concurrence, Alternative, or Deferral** | | | | | | |
| Concurrence with Guidance | | Alternative Guidance | | | Results in Deferral | |
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| **Funding** | | | | | | |
| DOE | LIHEAP | | State | Utility | | Other |
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| **How do you address suspected ACM’s (e.g., pipes, furnaces, other small surfaces) that will be disturbed through the course of weatherization work?** | | | | | | |
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| **Testing Protocols** | | | | | | |
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| **Client Education** | | | | | | |
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| **Training and Certification Requirements** | | | | | | |
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| **7.5 – Biologicals and Unsanitary Conditions**  (odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.) | | | | | | |
| **Concurrence, Alternative, or Deferral** | | | | | | |
| Concurrence with Guidance | | Alternative Guidance | | | Results in Deferral | |
| Unallowable Measure | | | | | | |
| **Funding** | | | | | | |
| DOE | LIHEAP | | State | Utility | | Other |
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| **What guidance do you provide Subgrantees for dealing with biological and/or unsanitary conditions in homes slated for weatherization?** | | | | | | |
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| **Testing Protocols** | | | | | | |
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| **Client Education** | | | | | | |
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| **Training** | | | | | | |
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| **7.6 – Building Structure and Roofing** | | | | | | |
| **Concurrence, Alternative, or Deferral** | | | | | | |
| Concurrence with Guidance | | Alternative Guidance | | | Results in Deferral | |
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| **Funding** | | | | | | |
| DOE | LIHEAP | | State | Utility | | Other |
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| **What guidance do you provide Subgrantees for dealing with structural issues (e.g., roofing, wall, foundation) in homes slated for weatherization?** | | | | | | |
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| **How do you define “minor” or allowable structure and roofing repairs, and at what point are repairs considered beyond the scope of weatherization?** | | | | | | |
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| **If priority lists are used, and these repairs are designated as Incidental Repairs, at what point is a site-specific audit required?** | | | | | | |
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| **Client Education** | | | | | | |
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| **Training** | | | | | | |
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| **7.7 – Code Compliance** | | | | | | |
| **Concurrence, Alternative, or Deferral** | | | | | | |
| Concurrence with Guidance | | Alternative Guidance | | | Results in Deferral | |
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| **Funding** | | | | | | |
| DOE | LIHEAP | | State | Utility | | Other |
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| **What guidance do you provide Subgrantees for dealing with code compliance issues in homes receiving weatherization measures?** | | | | | | |
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| **What specific situations commonly trigger code compliance work requirements for your network? How are they addressed?** | | | | | | |
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| **Client Education** | | | | | | |
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| **Training** | | | | | | |
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| **7.8 – Combustion Gases** | | | | | | |
| **Concurrence, Alternative, or Deferral** | | | | | | |
| Concurrence with Guidance | | Alternative Guidance | | | Results in Deferral | |
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| **Funding** | | | | | | |
| DOE | LIHEAP | | State | Utility | | Other |
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| **Testing Protocols** | | | | | | |
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| **How are crews instructed to handle problems discovered during testing, and what are the specific protocols for addressing hazards that require an immediate response?** | | | | | | |
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| **Client Education** | | | | | | |
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| **Training** | | | | | | |
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| **7.9 – Electrical** | | | | | | |
| **Concurrence, Alternative, or Deferral** | | | | | | |
| Concurrence with Guidance | | Alternative Guidance | | | Results in Deferral | |
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| **Funding** | | | | | | |
| DOE | LIHEAP | | State | Utility | | Other |
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| **What guidance do you provide Subgrantees for dealing with electrical hazards, including knob & tube wiring, in homes slated for weatherization?** | | | | | | |
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| **How do you define “minor” or allowable electrical repairs, and at what point are repairs considered beyond the scope of weatherization?** | | | | | | |
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| **If priority lists are used, and these repairs are designated as Incidental Repairs, at what point is a site-specific audit required?** | | | | | | |
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| **Client Education** | | | | | | |
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| **Training** | | | | | | |
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| **7.10 – Formaldehyde, Volatile Organic Compounds (VOCs), Flammable Liquids, and other Air Pollutants** | | | | | | |
| **Concurrence, Alternative, or Deferral** | | | | | | |
| Concurrence with Guidance | | Alternative Guidance | | | Results in Deferral | |
| **Funding** | | | | | | |
| DOE | LIHEAP | | State | Utility | | Other |
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| **What guidance do you provide Subgrantees for dealing with formaldehyde, VOCs, flammable liquids, and other air pollutants identified in homes slated for weatherization?** | | | | | | |
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| **Testing Protocols** | | | | | | |
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| **Client Education** | | | | | | |
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| **Training** | | | | | | |
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| **7.11 – Fuel Leaks**  *(please indicate specific fuel type if policy differs by type)* | | | | | | |
| **Concurrence, Alternative, or Deferral** | | | | | | |
| Concurrence with Guidance | | Alternative Guidance | | | Results in Deferral | |
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| **Funding** | | | | | | |
| DOE | LIHEAP | | State | Utility | | Other |
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| **Remediation Protocols** | | | | | | |
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| **How do you define allowable fuel leak repairs, and at what point are repairs considered beyond the scope of weatherization?** | | | | | | |
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| **Client Education** | | | | | | |
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| **Training** | | | | | | |
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| **7.12 – Gas Ovens / Stovetops / Ranges** | | | | | | |
| **Concurrence, Alternative, or Deferral** | | | | | | |
| Concurrence with Guidance | | Alternative Guidance | | | Results in Deferral | |
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| **Funding** | | | | | | |
| DOE | LIHEAP | | State | Utility | | Other |
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| **What guidance do you provide Subgrantees for addressing unsafe gas ovens/stoves/ranges in homes slated for weatherization?** | | | | | | |
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| **Testing Protocols** | | | | | | |
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| **Client Education** | | | | | | |
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| **Training** | | | | | | |
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| **7.13 – Hazardous Materials Disposal**  **[Lead, Refrigerant, Asbestos, Mercury (including CFLs/fluorescents), etc.]**  *(please indicate material where policy differs by material)* | | | | | | |
| **Concurrence, Alternative, or Deferral** | | | | | | |
| Concurrence with Guidance | | Alternative Guidance | | | Results in Deferral | |
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| **Funding** | | | | | | |
| DOE | LIHEAP | | State | Utility | | Other |
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| **Client Education** | | | | | | |
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| **Training** | | | | | | |
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| **Disposal Procedures and Documentation Requirements** | | | | | | |
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| **7.14 – Injury Prevention of Occupants and Weatherization Workers**  (Measures such as repairing stairs and replacing handrails) | | | | | | |
| **Concurrence, Alternative, or Deferral** | | | | | | |
| Concurrence with Guidance | | Alternative Guidance | | | Results in Deferral | |
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| **Funding** | | | | | | |
| DOE | LIHEAP | | State | Utility | | Other |
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| **What guidance do you provide Subgrantees regarding allowable injury-related repairs  (e.g., stairs, handrails, porch deck board)?** | | | | | | |
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| **How do you define “minor” or allowable injury prevention measures, and at what point are repairs considered beyond the scope of weatherization? Quantify “minor” or allowable injury prevention measures.** | | | | | | |
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| **Training** | | | | | | |
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| **7.15 – Lead Based Paint** | | | | | | |
| **Concurrence, Alternative, or Deferral** | | | | | | |
| Concurrence with Guidance | | Alternative Guidance | | | Results in Deferral | |
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| **Funding** | | | | | | |
| DOE | LIHEAP | | State | Utility | | Other |
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| **Safe Work Protocols** | | | | | | |
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| **Testing Protocols** | | | | | | |
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| **Client Education** | | | | | | |
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| **Training and Certification Requirements** | | | | | | |
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| **Documentation Requirements** | | | | | | |
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| **7.16 – Mold and Moisture**  (Including but not limited to: drainage, gutters, down spouts, extensions, flashing, sump pumps, dehumidifiers, landscape, vapor retarders, moisture barriers, etc.) | | | | | | |
| **Concurrence, Alternative, or Deferral** | | | | | | |
| Concurrence with Guidance | | Alternative Guidance | | | Results in Deferral | |
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| **Funding** | | | | | | |
| DOE | LIHEAP | | State | Utility | | Other |
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| **What guidance do you provide Subgrantees for dealing with moisture related issues (e.g., drainage, gutters, down spouts, moisture barriers, dehumidifiers, vapor barrier on bare earth floors) in homes slated for weatherization?** | | | | | | |
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| **How do you define “minor” or allowable moisture-related measures, and at what point is work considered beyond the scope of weatherization?** | | | | | | |
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| **Client Education** | | | | | | |
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| **Training** | | | | | | |
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| **7.17 – Pests** | | | | | | |
| **Concurrence, Alternative, or Deferral** | | | | | | |
| Concurrence with Guidance | | Alternative Guidance | | | Results in Deferral | |
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| **Funding** | | | | | | |
| DOE | LIHEAP | | State | Utility | | Other |
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| **What guidance do you provide Subgrantees for dealing with pests and pest intrusion prevention in homes slated for weatherization?** | | | | | | |
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| **Define Pest Infestation Thresholds, Beyond Which Weatherization Is Deferred** | | | | | | |
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| **Testing Protocols** | | | | | | |
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| **Client Education** | | | | | | |
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| **Training** | | | | | | |
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| **7.18 – Radon** | | | | | | |
| **Concurrence, Alternative, or Deferral** | | | | | | |
| Concurrence with Guidance | | Alternative Guidance | | | Results in Deferral | |
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| **Funding** | | | | | | |
| DOE | LIHEAP | | State | Utility | | Other |
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| **What guidance do you provide Subgrantees around radon?** | | | | | | |
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| **Testing Protocols** | | | | | | |
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| **Client Education** | | | | | | |
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| **Training and Certification Requirements** | | | | | | |
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| **Documentation Requirements** | | | | | | |
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| **7.19 – Safety Devices: Smoke and Carbon Monoxide Alarms, Fire Extinguishers** | | | | | | |
| **Concurrence, Alternative, or Deferral** | | | | | | |
| Concurrence with Guidance | | Alternative Guidance | | | Results in Deferral | |
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| **Funding** | | | | | | |
| DOE | LIHEAP | | State | Utility | | Other |
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| **What is your policy for installation or replacement of the following:** | | | | | | |
| Smoke Alarms: | | | | | | |
| Carbon Monoxide Alarms: | | | | | | |
| Fire Extinguishers: | | | | | | |
| **Testing Protocols** | | | | | | |
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| **Client Education** | | | | | | |
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| **Training** | | | | | | |
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| **7.20 – Occupant Health and Safety Concerns and Conditions** | | | | | | |
| **Concurrence, Alternative, or Deferral** | | | | | | |
| Concurrence with Guidance | | Alternative Guidance | | | Results in Deferral | |
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| **Funding** | | | | | | |
| DOE | LIHEAP | | State | Utility | | Other |
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| **What guidance do you provide Subgrantees for soliciting the occupants’ health and safety concerns related to components of their homes?** | | | | | | |
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| **What guidance do you provide Subgrantees for determining whether occupants suffer from health conditions that may be negatively affected by the act of weatherizing their home?** | | | | | | |
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| **What guidance do you provide Subgrantees for dealing with potential health concerns when they are identified?** | | | | | | |
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| **Client Education** | | | | | | |
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| Documentation Form(s) have been developed and comply with guidance? Yes  No | | | | | | |
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| **7.21 – Ventilation and Indoor Air Quality** | | | | | | |
| **Concurrence, Alternative, or Deferral** | | | | | | |
| Concurrence with Guidance | | Alternative Guidance | | | Results in Deferral | |
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| **Funding** | | | | | | |
| DOE | LIHEAP | | State | Utility | | Other |
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| **Identify the Most Recent Version of ASHRAE 62.2 Implemented (optional: identify Addenda used)** | | | | | | |
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| **Testing and Final Verification Protocols** | | | | | | |
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| **Client Education** | | | | | | |
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| **Training** | | | | | | |
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| **7.22 – Window and Door Replacement, Window Guards** | | | | | | |
| **Concurrence, Alternative, or Deferral** | | | | | | |
| Concurrence with Guidance | | Alternative Guidance | | | Results in Deferral | |
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| **Funding** | | | | | | |
| DOE | LIHEAP | | State | Utility | | Other |
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| **What guidance do you provide to Subgrantees regarding window and door replacement and window guards?** | | | | | | |
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| **Testing Protocols** | | | | | | |
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| **Client Education** | | | | | | |
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| **Training** | | | | | | |
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| **7.23 – Worker Safety (OSHA, etc.)** | | | | | | |
| **Concurrence, Alternative, or Deferral** | | | | | | |
| Concurrence with Guidance | | Alternative Guidance | | | Results in Deferral | |
|  | | | | | | |
| **Funding** | | | | | | |
| DOE | LIHEAP | | State | Utility | | Other |
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| **How do you verify safe work practices? What is your policy for in-progress monitoring?** | | | | | | |
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| **Training and Certification Requirements** | | | | | | |
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| **7.24 – <Add in Topic>** | | | | | | |
| **Concurrence, Alternative, or Deferral** | | | | | | |
| Concurrence with Guidance | | Alternative Guidance | | | Results in Deferral | |
|  | | | | | | |
| **Funding** | | | | | | |
| DOE | LIHEAP | | State | Utility | | Other |
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| **Remediation Protocols** | | | | | | |
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| **Testing Protocols** | | | | | | |
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| **Client Education** | | | | | | |
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| **Training** | | | | | | |
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| **7.24 – <Add in Topic>** | | | | | | |
| **Concurrence, Alternative, or Deferral** | | | | | | |
| Concurrence with Guidance | | Alternative Guidance | | | Results in Deferral | |
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| **Funding** | | | | | | |
| DOE | LIHEAP | | State | Utility | | Other |
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| **Remediation Protocols** | | | | | | |
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| **Testing Protocols** | | | | | | |
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| **Client Education** | | | | | | |
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| **Training** | | | | | | |
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