Wisconsin Weatherization Health and Safety Plan

☑ 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.

Wisconsin's Health and Safety policy has been in place since 2005 and has evolved as new information and materials become available. The Division sets overall Health and Safety (H&S) policy for the Weatherization Assistance Program in accordance with DOE's regulations and guidance. Wisconsin acknowledges that within those policy guidelines there are other local, state, and federal authorities that have jurisdiction over specific hazards and how those hazards must be addressed. The requirement to meet all applicable regulations and codes is referenced in the Wisconsin Field Guide and in numerous citations in the state's Weatherization Program Manual. To meet multiple H&S requirements, the Division provides resources and policy guidelines for addressing weatherization related H&S repairs, safety equipment, training and technical support. Elimination of Health and Safety hazards, if using weatherization program funds, shall be done in conjunction with the installation of energy conservation measures. No H&S measures shall be performed in a home unless ECMs are also part of the scope of work. The H&S Plan and allowable H&S measures are applied consistently across the state of Wisconsin.

Customer education is provided by the energy auditor prior to the start of weatherization work with the Health and Safety Checklist (Attachment 11). Required EPA educational materials are provided by the subgrantee prior to weatherization work beginning. The Wisconsin Weatherization Field Guide contains guidance for crews and contractors when providing customer education while the job is in-progress. After weatherization work is completed each household receives a Customer Guidebook (Attachment 12). This document provides information specific to the measures installed in the home.

Training is provided to address Health and Safety issues as described in Master File Section V.8.4.
H&S training will also include how to work safely (crews and customers) in COVID-19.

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 ☐

The Division provides its weatherization subgrantees with an allocation of funds, identified as a budget line item, to be used for required H&S activities on buildings being weatherized. H&S costs are budgeted as a separate category. The H&S budget is $350,000 or 5% of the subgrantee allocation. The ACPU is $6,592.94 would equal an average of approximately $342 per dwelling unit for health and safety. Multiple funding sources are used for H&S repair measures, including DOE WAP funds. The Division restricts the use of WAP funds to DOE allowable activities through a reporting mechanism in HE+ System/WisWAP that limits which funds can be allocated to each measure. Furthermore, HE+ System/WisWAP system controls are in place to ensure the Grantee cannot charge to a non-allowed DOE H&S activity. H&S related measures are reported separately in the HE+ System/WisWAP reporting system. The purchase and maintenance of personal protective equipment and other safety equipment is allowed. Each grantee has a local Training and Technical Assistance budget and those funds may be used to provide training and certifications as needed to address H&S issues.

3.0 – Health and Safety Expenditure Limits

Wisconsin defines Health and Safety measures as the cost of materials and labor needed to eliminate or reduce hazards existing before, or potentially resulting from the installation of weatherization materials. To control costs and ensure that these measures are considered in the context of the weatherization work being done, whenever the estimated costs for H&S measures exceed $1,500 the auditor must have written prior approval from Program manager before work can begin and the building SIR must be 1.0 or greater (see Weatherization Assistant Guide Section 4.5 Itemized Costs). Three items are exempt from the $1,500 calculation: ventilation costs for indoor air quality, gas line testing, and worst-case draft testing. Buildings that cannot be weatherized without the H&S measures must be deferred. The cost of incidental repairs, if such repairs are necessary to make the installation of weatherization materials effective, are allowed costs when NEAT/MHEA auditing requirements have been followed as required.

Wisconsin's guidance to subgrantees is to model all H&S measures as an energy conservation measure (ECM) first, prior to designating it as an H&S measure. When the measure can be cost-justified, the measure shall be treated as an ECM. While the cost of H&S measures may be modeled with a specific ECM, they are charged to a separate budget cost category in our HE+ System/WisWAP reporting system. This is an important quality assurance tool which allows the Division to track and manage all H&S costs.

All Wisconsin WAP subgrantees are required to carry workers compensation and contractor liability insurance. Subcontractors are required to provide proof of insurance to the subgrantees prior to working on any dwellings. Pollution Occurrence Insurance is strongly recommended to subgrantees.

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")

Repairs are only allowable when necessary for the effective performance or preservation of energy conservation measure materials. The cost of incidental repairs, if such repairs are necessary to make the installation of weatherization materials effective, are allowed costs when NEAT/MHEA auditing requirements have been followed. All DOE funded repair measures shall be modeled in the Weatherization Assistant Itemized Cost tab and included in the SIR (see Weatherization Assistant Guide Section 4.5 Itemized Costs). The repair costs are reported under the appropriate Repair category in HE+ System/WisWAP, the online invoicing system used by subgrantees (Weatherization Program Manual Appendix B WisWAP Reporting Guide). Wisconsin has a separate reporting category for Repairs which allows continuous monitoring and evaluation of costs. If the repairs reduce the cumulative SIR to below 1.0, and the building cannot be weatherized without the repairs, the building shall be deferred, or other non-DOE program funds used.

5.0 – Deferral/Referral Policy

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.
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?
Wisconsin Weatherization Assistance Program Manual Section 3.6, available on the Home Energy Plus website..
Wisconsin has a well-established set of deferral standards. Wisconsin has a standardized Deferral of Service Notification form which is used to document and notify applicants of specific conditions that require service to be deferred. Letters are generated in the HE+ System. The applicant receives a written Deferral Notification within five working days of the decision to defer service. The form includes the customer name and address and the date of inspection. Also included with the notice are a specific description of what issues need to be addressed for work to proceed, and the subgrantee's applicant appeal procedures. The form is delivered in person or sent by mail. When service is deferred, the owner or occupant shall be given a reasonable timeframe to correct the problem. Wisconsin policy requires the subgrantee document the deferral reason in HE+ System/WisWAP.

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 ☐
Subgrantees are required to identify Health and Safety hazards during the energy audit/assessment, notify the property owner and occupants of these hazards and, depending on the type and extent of the problem, eliminate the identified hazards when they are present prior to or during weatherization activities. The Health and Safety Checklist (Attachment 11) is required for every DOE unit, and includes the Building Identification number, unit number and date of inspection. It is signed by the unit occupant, an agency representative (typically the energy auditor) and maintained in the customer file. This document includes hazards identified in the home and indicates whether they may be addressed through the weatherization program. As stated previously, if the H&S hazards cannot be eliminated, service to the building must be deferred. All customers receive the EPA informational pamphlets “A Brief Guide to Mold, Moisture and Your Home,” “The Lead-Safe Certified Guide to Renovate Right,” and “A Citizen’s Guide to Radon.” A customer signature is obtained on the Health and Safety Checklist to verify receipt of these items. When appropriate, additional educational materials such as the EPA booklet, “Indoor Air Hazards” may be provided to customers.

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 17-06 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 17-06, Grantees must concur, or choose to defer all units where the specific category is encountered.*
- *"Allowable" items under WPN 17-06 leave room for Grantees to determine if the category, or testing, will be addressed and in what circumstances.*
- *Declare whether DOE funds or alternate funding source(s) will be used to address the particular category.*
- *Describe the explicit methods to remedy the specific category.*
- *Describe what testing protocols (if any) will be used.*
- *Define minimum thresholds that determine minor and major repairs*
- *Identify minimum documentation requirements for at-risk occupants*
- *Discuss what explicit steps will be taken to educate the client, if any, on the specific category if this is not explained elsewhere in the Plan. Some categories, like mold and moisture, require client education.*
- *Discuss how training and certification requirements will be provided for the specific category. Some categories, like Lead Based Paint, require training.*
- *Describe how occupant health and safety concerns and conditions will be solicited and documented*

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

7.1 – Air Conditioning and Heating Systems

Concurrence, Alternative, or Deferral			
Concurrence with Guidance for Heating Systems ☑			
Air Conditioning Unallowable Measure ☑ Heating Unallowable Measure ☐			
Funding			
DOE ☑	LIHEAP ☑	Utility ☑	Other ☐
How do you address unsafe or non-functioning primary heating/cooling systems?			
Heating system replacement and repair for health and safety is allowed and must be modeled with the Weatherization Assistant energy audit. Subgrantees are required to use a heating system sizing calculator which considers climatic conditions and insulation levels in the home. These include REScheck, ACCA Manual J, or an equivalent industry accepted sizing formula. Subgrantees may also refer inoperable or unsafe heating systems to the Home Energy Plus Furnace Program. This program uses leveraged utility funds to assist eligible households with no heat or unsafe situations.			
How do you address unsafe or non-functioning secondary heating systems, Including unvented secondary space heaters?			

Solid Fuel Heating (Wood Stoves, etc.)
Replacement of wood-fueled primary heating systems is considered a Health and Safety measure. Secondary heating systems may be replaced if the system is a safety hazard and cannot be eliminated with the replacement of a primary system. The replacement of the secondary heating system is modeled as a Health and Safety measure with the NEAT audit. Woodstove replacements are addressed using non-DOE funds through Wisconsin's HE+ Furnace Program, whenever possible.

Space Heaters, Stand Alone Electric
Repair, replacement, or installation of stand-alone electric space heaters is not allowed as health and safety or energy conservation measure.

Space Heaters, Unvented Combustion
Weatherizing a home with an un-vented space heater is not allowed. Un-vented space heater(s) that may have a harmful effect on the air quality of the home is identified as a reason for deferral of service.

Space Heaters, Vented Combustion
Vented combustion space heaters are inspected and tested for safety and efficiency. Unsafe space heaters may be replaced as an energy conservation measure or a health and safety measure if cost effective based on modeling it with the electronic energy audit.

Indicate Documentation Required for At-Risk Occupants

n/a

Testing Protocols

Standardized Heating System Checklists are required to be followed for repairs and replacements.

7.2 - Asbestos - All

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

From Weatherization Program Manual Section 9.6.4.3:
A blower door should be utilized to diagnose, measure and identify air leakage for effective weatherization of all buildings (see also Section 8.2.1). Agencies shall contact the Help Desk when an exception to utilizing a blower door to obtain the As-Is CFM50 may be justified to request approval prior to proceeding with weatherization. Perform blower door tests based on the type of ACM present in the building, as follows.

- When no confirmed ACM is present within the pressure boundary (as confirmed by testing) or only non-friable PACM is present within the pressure boundary, the building may be depressurized or pressurized utilizing a blower door.
- When vermiculite that may contain asbestos is present in an attic and/or walls or friable PACM is present within the pressure boundary but not at risk of becoming airborne, the building may be pressurized only utilizing a blower door.
- When friable PACM is present inside the pressure boundary and at risk of becoming airborne, eliminate or minimize the hazard prior to utilizing a blower door. The identified hazard should be addressed prior to starting weatherization by crews to effectively complete air sealing work utilizing a blower door. A final test is required to calculate natural ventilation to reduce the minimum required flow rate of installed mechanical ventilation.

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

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☑	Alternative Guidance ☐	Results in Deferral ☐		
Funding				
DOE ☑	LIHEAP ☑	State ☐	Utility ☑	Other ☐
How do you address suspected ACM's in siding, walls, or ceilings that will be disturbed through the course of weatherization work?				
Subgrantee audit staff has the responsibility to identify potential asbestos containing products and will notify the program participant of the existence of any suspect or presumed asbestos containing material (PACM) that may represent a hazard or will be disturbed during weatherization. The complete asbestos policy can be found in the Wisconsin Weatherization Program Manual Chapter 9. Any disturbance of more ACM/PACM than is allowed with O&M training must be completed by certified Asbestos Workers and Supervisors. If weatherization program funds are used for this work the total cost must be modeled with a DOE approved computerized energy audit and carry an SIR of 1.0 or more for the measure and the job. If completion of the asbestos work and the measure do not generate an SIR of 1.0 or greater, the energy auditor will refer the participant to other rehabilitation programs for alternative assistance. If a major weatherization measure cannot be completed due to ACM, the unit may require deferral. The required Deferral Notification form signed by the customer identifies any required asbestos abatement work that must be completed before the subgrantee will proceed with weatherization, and further requires the customer provide proof that any asbestos abatement work was performed by an asbestos contractor and workers certified by the State of Wisconsin Department of Health Services and passed clearance testing when the abatement was completed. The results of any asbestos testing that leads to a deferral will be communicated to the customer in the deferral notification letter. The customer may request a paper copy of the test results from the subgrantee.				
Testing Protocols				
All building components, except for metal, glass, wood, and fiberglass, shall either be assumed to contain asbestos or proven not to contain asbestos through bulk sampling by a certified Asbestos Inspector and analysis performed by an accredited laboratory. Testing for asbestos is an allowable cost. Analysis of bulk samples shall be performed by a National Voluntary Laboratory Accreditation Program (NVLAP) listed laboratory, using EPA approved test methods. If testing results determine that the material contains asbestos, as defined by DHS 159 agencies may consider proceeding with the asbestos work following the modeling guidelines outlined in Chapter 5 in the Weatherization Assistance Guide. The agency shall retain the results of testing in the customer file regardless of the outcome (see 2.2.3 Customer Files). If a positive asbestos test results in a deferral of weatherization work, then the test result shall be communicated in writing in the Deferral Notification provided to the building owner. The agency shall provide any test results requested by the customer.				
Training and Certification Requirements				
The State of Wisconsin requires subgrantees to have all field staff trained in Asbestos Operations and Maintenance (O&M) at a minimum. This allows an installer to work safely around asbestos while the weatherization work is being completed with limited disturbance. Subgrantees can complete higher levels of asbestos training to ensure compliance with EPA, OSHA, DOE, HUD, and Wisconsin Department of Health Services regulations. The higher-level training will reduce the potential for deferral of some of Wisconsin's highest energy usage households. Each subgrantee is required to have at least one certified Asbestos Supervisor/Inspector. This individual is responsible for ensuring workers receive O&M training, use proper procedures and equipment, and who can determine when a job exceeds O&M levels.				

7.2b – Asbestos - in vermiculite				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance ☑	Alternative Guidance ☐	Results in Deferral ☐		
Funding				
DOE ☑	LIHEAP ☑	State ☐	Utility ☑	Other ☐
How do you address suspected ACM's in vermiculite that will be disturbed through the course of weatherization work?				
The determination of whether work will exceed O&M limits shall be made on a case-by-case basis. Removal of vermiculite insulation is not allowed.				
Testing Protocols				
Vermiculite insulation is always assumed to contain asbestos.				
Training and Certification Requirements				
The State of Wisconsin requires subgrantees to have all field staff trained in Asbestos Operations and Maintenance (O&M) at a minimum. This allows an installer to work safely around asbestos while the weatherization work is being completed with limited disturbance. Subgrantees can complete higher levels of asbestos training to ensure compliance with EPA, OSHA, DOE, HUD, and Wisconsin Department of Health Services regulations. The higher-level training will reduce the potential for deferral of some of Wisconsin's highest energy usage households. Each subgrantee is required to have at least one certified Asbestos Supervisor/Inspector. This individual is responsible for ensuring workers receive O&M training, use proper procedures and equipment, and who can determine when a job exceeds O&M levels.				

7.2c – Asbestos - on pipes, furnaces, other small covered surfaces				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance ☑	Alternative Guidance ☐	Results in Deferral ☐		
Funding				
DOE ☑	LIHEAP ☑	State ☐	Utility ☑	Other ☐
How do you address suspected ACM's (e.g., pipes, furnaces, other small surfaces) that will be disturbed through the course of weatherization work?				

Subgrantee audit staff has the responsibility to identify potential asbestos containing products and will notify the program participant of the existence of any suspect or presumed asbestos containing material (PACM) that may represent a hazard or will be disturbed during weatherization. The complete asbestos policy can be found in the Wisconsin Weatherization Program Manual Chapter 9.

Any disturbance of more ACM than is allowed with O&M training must be completed by certified Asbestos Workers and Supervisors. If weatherization program funds are used for this work the total cost must be modeled with a DOE approved computerized energy audit and carry an SIR of 1.0 or more for the measure and the job. If completion of the asbestos work and the measure do not generate an SIR of 1.0 or greater, the energy auditor will refer the participant to other rehabilitation programs for alternative assistance. If a major weatherization measure cannot be completed due to ACM, the unit may require deferral. The required Deferral Notification form signed by the customer identifies any required asbestos abatement work that must be completed before the subgrantee will proceed with weatherization, and further requires the customer provide proof that any asbestos abatement work was performed by an asbestos contractor and workers certified by the State of Wisconsin Department of Health Services and passed clearance test at completion of work. The results of any asbestos testing that leads to a deferral will be communicated to the customer in the deferral notification letter. The customer may request a paper copy of the test results from the subgrantee.

Testing Protocols

All building components, except for metal, glass, wood, and fiberglass, shall either be assumed to contain asbestos or proven not to contain asbestos through bulk sampling by a certified Asbestos Inspector and analysis performed by an accredited laboratory. Testing for asbestos is an allowable cost. Analysis of bulk samples shall be performed by a National Voluntary Laboratory Accreditation Program (NVLAP) listed laboratory, using EPA approved test methods.

If testing results determine that the material contains asbestos, as defined by DHS 159, agencies may consider proceeding with the asbestos work following the modeling guidelines outlined in Chapter 5 in the Weatherization Assistance Guide. The agency shall retain the results of testing in the customer file regardless of the outcome (see 2.2.3 Customer Files). If a positive asbestos test results in a deferral of weatherization work, then the test result shall be communicated in writing in the Deferral Notification provided to the building owner. The agency shall provide any test results requested by the customer.

Training and Certification Requirements

The State of Wisconsin requires subgrantees to have all field staff trained in Asbestos Operations and Maintenance (O&M) at a minimum. This allows an installer to work safely around asbestos while the weatherization work is being completed with limited disturbance. Subgrantees can complete higher levels of asbestos training to ensure compliance with EPA, OSHA, DOE, HUD, and Wisconsin Department of Health Services regulations. The higher-level training will reduce the potential for deferral of some of Wisconsin's highest energy usage households. Each subgrantee is required to have at least one certified Asbestos Supervisor/Inspector. This individual is responsible for ensuring workers receive O&M training, use proper procedures and equipment, and who can determine when a job exceeds O&M levels.

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 ☐

What guidance do you provide Subgrantees for dealing with biological and/or unsanitary conditions in homes slated for weatherization?
Subgrantee audit staff has the responsibility as part of the energy audit/assessment process to identify biological hazards such as mold, odors, raw sewage, or rotting wood. Energy auditors must take any conditions identified into consideration in the selection of measures appropriate for that building. In instances where the hazard is of such a severity as to cause undue safety or health concerns to crews, subcontractor staff, or occupants, the auditor is authorized to defer weatherization until the hazard has been addressed. Any remediation is modeled as an itemized cost in Weatherization Assistant and subject to the health and safety expenditure limits.
Testing Protocols
Visual inspection during energy audit

7.6 – Building Structure and Roofing

Concurrence, Alternative, or Deferral				
Concurrence with Guidance ☑	Alternative Guidance ☐	Results in Deferral ☑		
Funding				
DOE ☑	LIHEAP ☑	State ☐	Utility ☑	Other ☐

What guidance do you provide Subgrantees for dealing with structural issues (e.g., roofing, wall, foundation) in homes slated for weatherization?
The State of Wisconsin encourages subgrantees to work with all available building repair and rehabilitation programs. The Division of Energy, Housing and Community Resources administers the Community Development Block Grant and HOME HHR programs, and some subgrantees have funding for these services in-house. Wisconsin does allow for incidental repairs necessary for the effective performance or preservation of weatherization materials as discussed previously.
How do you define "minor" or allowable structure and roofing repairs, and at what point are repairs considered beyond the scope of weatherization?
Repairs are only allowable when necessary for the effective performance or preservation of energy conservation measure materials. The cost of incidental repairs, if such repairs are necessary to make the installation of weatherization materials effective, are allowed costs when NEAT/MHEA auditing requirements have been followed. All repair measures shall be modeled in the Weatherization Assistant Itemized Cost tab and included in the SIR (see Weatherization Assistant Guide Section 4.5 Itemized Costs). If the repairs reduce the cumulative SIR to below 1.0, and the building cannot be weatherized without the repairs, the building shall be deferred.
If priority lists are used, and these repairs are designated as Incidental Repairs, at what point is a site-specific audit required?
n/a

7.7 – Code Compliance

Concurrence, Alternative, or Deferral				
Concurrence with Guidance ☑	Alternative Guidance ☐	Results in Deferral ☑		
Funding				
DOE ☑	LIHEAP ☑	State ☐	Utility ☑	Other ☐

What guidance do you provide Subgrantees for dealing with code compliance issues in homes receiving weatherization measures?
It is the policy of the Wisconsin Weatherization program to minimize Health and Safety and Repair Costs and to use alternative (non-weatherization program) funding to address code compliance issues whenever feasible. Repairs and health and safety measures that are excessive in cost are cause for deferral. Occasionally a preexisting code compliance issue is triggered by an energy conservation measure and paid for with weatherization program funds. Wisconsin delegates the responsibility of local and state code compliance to its subgrantees. Subgrantees have the responsibility to obtain any permits necessary to perform required weatherization work. Fees for these permits are an allowable expense to the weatherization program. To ensure compliance with appropriate codes, onsite monitoring of the weatherization work performed may be conducted. State or national code requirements are referenced in Wisconsin's Weatherization Program Manual and Field Guide, where applicable.
What specific situations commonly trigger code compliance work requirements for your network? How are they addressed?
A list of common State of Wisconsin Codes triggered by weatherization ECMs and paid for with weatherization funds is provided in Weatherization Program Manual 8.10.

7.8 – Combustion Gases

Concurrence, Alternative, or Deferral		
Concurrence with Guidance ☑	Alternative Guidance ☐	Results in Deferral ☐

Funding				
DOE ☑	LIHEAP ☑	State ☐	Utility ☑	Other ☐

Testing Protocols

Required Combustion Safety Testing:

1) Detection of fuel leaks, primarily for gas but also oil
2) Spillage testing under worst case depressurization at required time limit
3) CO testing of combustion appliances including kitchen stoves
4) Continual monitoring of ambient CO

Ambient carbon monoxide is monitored during combustion testing. The State requires a "test in/test out" standard of safety testing on naturally drafting combustion appliances, as well as the dwelling. All combustion appliances must be inspected prior to weatherization work commencing, and upon completion. Identification of the presence of combustion gases (such as carbon monoxide) is part of the energy auditor's responsibility in the audit/assessment stage of weatherization, the weatherization installers during weatherization work, and the HVAC installer when work is completed on the appliance.

In addition, Wisconsin requires a spillage test is performed to ensure that flue gases are not back-drafting into the building (Weatherization Field Guide 5.8). This is accomplished by putting the building into a greatest depressurization achievable and determining if any flue gases are venting into the building. Measurements are made and recorded for later use if necessary. If back-drafting occurs, remediation is required, and further tests conducted until the situation is corrected. State of Wisconsin Quality Assurance/Technical Assistance staff spot check weatherized buildings to ensure that these procedures have been followed. In instances where non-weatherization related combustion appliances are deemed a hazard, the customer is notified of the issue, informed of what steps may be taken to remedy it, and referred to additional funding sources if needed.

How are crews instructed to handle problems discovered during testing, and what are the specific protocols for addressing hazards that require an immediate response?
When a job is in-progress and a water heater or heating system fails due to Health and Safety after work has begun, the crew must notify the energy auditor. The audit shall be updated with the equipment replacement(s). The replacements must be approved by the Program Manager if the cost is above the $1,500 threshold. If the presence of gas is an imminent threat to the safety of workers and occupants, the building will be evacuated, and the utility or gas company must be notified immediately.
Training
Energy auditors and inspection staff, as well as crew leaders, have been trained in the use of gas detectors and the techniques for identifying the presence of combustible gases, as well as combustion gases. Training is offered in the Wisconsin Uniform Dwelling codes, National Fuel Gas code, and applicable National Fire Protection Association model codes. The Wisconsin WAP references the National Fuel Gas Code and the National Fire Protection Association's standards in its training curriculum and standards for installation of combustion appliances. These codes establish minimum clearances from combustible materials for the different components of these appliances.

7.9 – Electrical				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance ☑	Alternative Guidance ☐	Results in Deferral ☑		
Funding				
DOE ☑	LIHEAP ☑	State ☐	Utility ☑	Other ☐
What guidance do you provide Subgrantees for dealing with electrical hazards, including knob & tube wiring, in homes slated for weatherization?				
All replacement heating systems must be on a dedicated circuit. That cost must be factored into the cost of the heating system or the job SIR. When serious deficiencies are present in the existing electrical system, such as an overloaded circuit, subgrantees are required to inform the occupants and owner of the unsafe condition and offer information on other available rehabilitation program resources. No additional load may be added to an already overloaded service. Weatherization services must be deferred if such a condition exists until the condition is remedied. The Wisconsin WAP, in compliance with the state's electrical code, prohibits the insulation of sidewall cavities with live knob and tube wiring present. In attics and other accessible areas, tenting is required with a minimum of 3 inches of free air clearance around the wiring. All knob and tube wiring are tested to determine if it is still being used to distribute power. This work is performed as required by state and local code. When necessary, subgrantees may defer weatherization work until a rehabilitation program replaces the knob and tube wiring. Subgrantees are encouraged to "piggy-back" with rehabilitation programs for aid in removing knob and tube wiring.				
How do you define "minor" or allowable electrical repairs, and at what point are repairs considered beyond the scope of weatherization?				

Repairs are only allowable when necessary for the effective performance or preservation of energy conservation measure materials. The cost of incidental repairs, if such repairs are necessary to make the installation of weatherization materials effective, are allowed costs when NEAT/MHEA auditing requirements have been followed. All repair measures shall be modeled in the Weatherization Assistant Itemized Cost tab and included in the SIR (see Weatherization Assistant Guide Section 4.5 Itemized Costs). If the repairs reduce the cumulative SIR to below 1.0, and the building cannot be weatherized without the repairs, the building shall be deferred.
If priority lists are used, and these repairs are designated as Incidental Repairs, at what point is a site-specific audit required?
n/a

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 ☐
What guidance do you provide Subgrantees for dealing with formaldehyde, VOCs, flammable liquids, and other air pollutants identified in homes slated for weatherization?				
Subgrantee energy auditors have responsibility for identifying situations where new carpeting and other products are out-gassing potentially harmful by-products and making appropriate adjustments in the air sealing measures. Currently, Wisconsin Air Sealing Protocols includes adjustments for the presence of formaldehyde or VOC's. Identifying the presence of formaldehyde or VOC's is included as part of Wisconsin's training of energy auditors. In addition, ventilation is used to address low-level indoor air pollutants.				
Testing Protocols				
Inspection during energy audit				

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 ☐		
Funding				
DOE ☑	LIHEAP ☑	State ☐	Utility ☑	Other ☐
Remediation Protocols				
Fuel leak detection is a required diagnostic testing procedure in all weatherized homes (Program Manual Section 8.2). Wisconsin communicates this requirement to subcontractors in standardized procurement specifications (HVAC Attachment 4 Section B). The specifications require testing gas lines for fuel leaks in natural gas and propane piping systems with an electronic combustible-gas detector and further requires: sniffing all valves and joints; verifying any detected leaks with non-corrosive bubbling liquid designed for finding gas leaks; repairing all gas leaks verified with bubbling liquid; replacing kinked or corroded flexible gas connectors; and, replacing spring style gas valves with ball style gas valves if leak detected and verified. Any identified gas leaks will be noted on the Health and Safety Checklist that is signed by the building occupant.				

How do you define allowable fuel leak repairs, and at what point are repairs considered beyond the scope of weatherization?
Gas line (fuel leak) repair is an allowable Health and Safety measure, and the measure cost is excluded from the SIR. Natural gas leaks on the utility side of the meter should be addressed by the utility or the building owner. Limited repair is allowed when the LP tank and distribution are owned by the low-income customer.

7.12 – Gas Ovens / Stovetops / Ranges				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance ☑	Alternative Guidance ☐	Results in Deferral ☑		
Funding				
DOE ☑	LIHEAP ☑	State ☐	Utility ☑	Other ☐
Testing only, repair/replacement is not an allowable cost.				
What guidance do you provide Subgrantees for addressing unsafe gas ovens/stoves/ranges in homes slated for weatherization?				
Weatherization funds shall not be used to repair or replace cooking stoves, ovens or ranges with carbon monoxide emissions. If a gas leak is detected, repair of gas leaks is an allowable measure. If the unit is not repairable or the cost of the repair is excessive, the customer is notified, and the unit shall be deferred until the issue is resolved.				
Testing Protocols				
Wisconsin requires inspecting cooking burners and ovens for operability and flame quality. Gas ovens are tested for as measured Carbon Monoxide levels. Testing procedures are detailed in Field Guide Section 5.4. Action levels for range ovens are: < 225 PPM recommend customer have the appliance serviced immediately by a qualified professional.				

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 ☐		
Funding				
DOE ☑	LIHEAP ☑	State ☐	Utility ☑	Other ☐
Disposal Procedures and Documentation Requirements				

This requirement is addressed in the Weatherization Program Manual and in procurement templates and specifications. Specific costs may be addressed as part of the measures costs or may be included as a health and safety cost. Examples include, 1) Proper disposal and recycling of replaced refrigerators is included in the replacement bid specifications, and 2) Proper disposal of ACM is included with the asbestos health and safety costs.

The Customer Guidebook provides information on safely disposing CFLs.

Wisconsin requires subgrantees to comply with state and federal requirements for the safe and legal disposal hazardous materials. Refrigeration appliances that are replaced must be disposed of according to the environmental standards in the Clean Air Act (1990), Section 608, as amended by Final Rule, 40 CFR 82, May 14, 1993. The local agency, appliance vendor, de-manufacturing center, or other entity recovering the refrigerant must possess an EPA-approved section 608 type-I license or an approved universal certification.

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 ☑

Funding

DOE ☑	LIHEAP ☑	State ☐	Utility ☑	Other ☐

What guidance do you provide Subgrantees regarding allowable injury-related repairs (e.g., stairs, handrails, porch deck board)?

Problems that would put our field staff at risk usually result in the building being deferred. Hazards that are identified but not addressed are to be noted on the Health & Safety Checklist.

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.

The cost of incidental repairs, if such repairs are necessary to make the installation of weatherization materials effective, are allowable costs when electronic auditing requirements have been followed as required.

7.15 – Lead Based Paint

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☑	Alternative Guidance ☐	Results in Deferral ☑

Funding

DOE ☑	LIHEAP ☑	State ☐	Utility ☑	Other ☐

Program funds may be used to minimize the potential hazard associated with disturbing painted surfaces through the course of installing energy conservation measures. Program funds shall not otherwise be used for the abatement, stabilization, or control of lead-based paint hazards that may exist in a unit. Program funds shall not be used for routine clearance testing after work is completed.

Safe Work Protocols

In accordance with EPA's Lead Renovation, Repair and Painting Program Rule, Wisconsin's lead policy is that unless a building is certified as "lead-free" all weatherization activities conducted on dwelling units constructed prior to 1978 (target housing) or a child occupied facility (built prior to 1978) shall be performed utilizing lead-safe work practices. When deferral is necessary the required Deferral Notification form signed by the customer identifies any required lead remediation work that must be completed before the subgrantee will proceed with weatherization. The results of any lead testing that cause a deferral will be communicated to the customer in the required Deferral Notification Letter, and the customer may request a paper copy of the test results from the subgrantee. Wisconsin requires training and certification as Lead Safe Renovators.

The State of Wisconsin Department of Health Services (DHS) received approval from EPA to enforce compliance and provide training and certification for lead safe renovation through State of Wisconsin, DHS Chapter 163. This statute meets the EPA requirements, and there are some areas where Wisconsin's DHS 163 is more restrictive than EPA's requirements. If there are discrepancies between EPA standards for lead safe procedures and the requirements of DHS 163, the latter will take precedence. Weatherization work follows the most restrictive requirements of the authorities having jurisdiction.

Testing Protocols

Wisconsin Department of Health Services (DHS) approved lead test kits may be used when cost-effective. Testing shall be limited to building components that will be disturbed. Note that the approved test kit must be used by a person with Certified Renovator credentials at minimum and requires the building owner's permission. See the DHS website for detailed test kit information and requirements. Agencies shall maintain a copy of all lead testing in the customer file (see 2.2.3 Customer Files). The Division strongly encourages testing for lead when the test has the potential to reduce the amount of labor required to complete weatherization work.

Client Education

Documentation that the occupant and/or owner received the EPA pamphlet "The Lead-Safe Certified Guide to Renovate Right" shall be maintained for every building weatherized. When a potential lead hazard is identified by the energy auditor, the weatherization file shall contain a Health and Safety Checklist that documents the hazard, testing performed, and type of lead-safe work required, if applicable (see 9.1.1 Health and Safety Checklist). If testing is performed and a positive test causes the building to be deferred, a written description of the test result shall be included in the Deferral Notification provided to the building owner. The agency shall provide any test results requested by the customer.

Training and Certification Requirements

Weatherization Program agencies shall be certified as a Lead-Safe Company by DHS. The EPA refers to Lead-Safe Companies as "firms." A Lead-Safe Company has at least one certified Lead-Safe Renovator on staff. For each employed or contracted worker of a Lead-Safe Company who is not a certified lead-safe renovator, the Lead-Safe Company shall maintain documentation of the training provided, including the worker's name, specific topics taught to the worker, the name and department certification number of the instructor for each topic, and the training date for each topic.

Weatherization program agencies that perform work in buildings on Tribal Lands shall be certified as Lead-Safe Certified Renovation Firms by EPA. Agencies can become certified by applying with EPA online at http://www2.epa.gov/lead/epa-lead-safe-certification-program. Individual Lead-Safe Renovator certifications for each employed or contracted worker are valid on Tribal Lands.

Documentation Requirements

Using the Wisconsin Weatherization Assistance Program Health and Safety Checklist, the weatherization agency shall identify the applicability of Lead-Safe Renovator requirements to ensure customer and worker safety. The weatherization agency is responsible for ensuring that contractors are notified in advance of lead-safe requirements (such as in the Request for Bid), are trained in and practice lead-safe work, and that Certified Renovators are present and complete a Renovation Recordkeeping Checklist when required.

When Lead Renovation requirements apply, a Wisconsin Weatherization Assistance Program Renovation Recordkeeping Checklist shall be completed and maintained in the customer file for review. Documentation shall be maintained for a minimum of three years (DHS 163.13(3)(c)).

7.16 – Mold and Moisture

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

Concurrence, Alternative, or Deferral		
Concurrence with Guidance ☑	Alternative Guidance ☐	Results in Deferral ☑

Funding				
DOE ☑	LIHEAP ☑	State ☐	Utility ☑	Other ☐

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

Due to the uniqueness of the mold hazard, energy auditors are required to take special care in identifying the presence or conditions that could lead to the presence of mold. The auditor performs a visual inspection of the building and identifies any location with the presence of mold. In those instances where mold is present, energy auditors are required to inspect the property for possible sources of moisture including air or water leaks, poor thermal barriers, and excessive moisture in the building due to improper ventilation. Program funds may be used to minimize or eliminate mold causing conditions in conjunction with the installation of energy conservation measures.

Wisconsin's Weatherization Field Guide, which is focused on installers, deals with moisture control in several sections including Building Shell Measures, Diagnostics Procedures, Mechanical Systems, and an extensive chapter on Health and Safety procedures. The State works with its training and technical assistance sub-contractor to update the Field Guide as needed.

As a standard of field practice, every building is assessed for building tightness and ventilation requirements using software based on the ASHRAE 62.2 and ANSI Standards. This software models the building for tightness and identifies the amount of ventilation to install, if needed. Subgrantees are also required to have equipment to measure the rate of exhaust ventilation and moisture meters.

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

Mold areas identified that comprise in total less than 10 square feet are not required to be addressed as a part of weatherization. In severe cases (more than 10 square feet) weatherization work must be deferred until the mold hazard has been eliminated. Current policy allows for appliance repair, dehumidifier replacement or installation. Water heater replacement as a health and safety measure is allowed and must be modeled with the electronic energy audit.

Client Education
The auditor is required to document the presence of moisture and mold by completing the Moisture and Mold Checklist, part of the Health and Safety Checklist referenced above. That checklist must be reviewed and signed by the customer and retained in the client file. Auditors are required to inform the participant of the hazards of mold and provide them a copy of the EPA pamphlet entitled, "A Brief Guide to Mold, Moisture and Your Home."
Training
Wisconsin's Basic Energy Auditor Curriculum, an IREC accredited training, includes a unit on moisture control. A second unit of the Basic Energy Auditor curriculum addresses air sealing and diagnostic procedures, with an overview of building tightness testing, depressurization limit testing, worst-case draft testing, carbon monoxide testing and Wisconsin's Deferral of Service policy.

7.17 – Pests

Concurrence, Alternative, or Deferral				
Concurrence with Guidance ☐				
Funding				
DOE ☐	Alternative Guidance ☐	Results in Deferral ☑		
What guidance do you provide Subgrantees for dealing with pests and pest intrusion prevention in homes slated for weatherization?				
Pest removal is not allowed with DOE weatherization funds.	LIHEAP ☑	State ☐	Utility ☐	Other ☐
Define Pest Infestation Thresholds, Beyond Which Weatherization Is Deferred				
Infestation of pests may be cause for deferral where it cannot be reasonably removed by the customer and/or poses a H&S hazard for workers.				
Testing Protocols				
Visual inspection during energy audit				
Client Education				
Observed conditions are communicated to the occupant on the Health and Safety Checklist. When deferral is necessary information is provided to the building owner in writing (Deferral Notification form) describing the conditions that must be met for weatherization to proceed.				

7.18 – Radon

Concurrence, Alternative, or Deferral				
Concurrence with Guidance ☑				
Funding				
DOE ☐	Alternative Guidance ☐	Results in Deferral ☐		
What guidance do you provide Subgrantees around radon?				
DOE ☐	LIHEAP ☑	State ☐	Utility ☑	Other ☐
Radon testing and mitigation are not allowed. Allowable weatherization measures that may reduce the exposure to radon such as covering of dirt floors per Standard Work Specification guidelines, sealing sump pit covers, and mechanical ventilation, are encouraged. This policy will be reviewed and revised as necessary based on published results of the DOE National Evaluation Air Quality study.				

Testing Protocols
n/a
Client Education
All clients are provided the EPA pamphlet, "A Citizen's Guide to Radon" and building occupants sign an informed consent statement on the Health and Safety Checklist.

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

Concurrence, Alternative, or Deferral			
Concurrence with Guidance ☑			
Funding			
DOE ☑	Alternative Guidance ☐	Results in Deferral ☐	
What is your policy for installation or replacement of the following?			
	LIHEAP ☑	State ☐ Utility ☑	Other ☐
Carbon Monoxide Alarms: When not present or when existing carbon monoxide alarms are non-functional, install a carbon monoxide alarm in the vicinity of sleeping area(s). If the sleeping areas cannot be monitored with one detector more than one detector shall be installed.			
Smoke Alarms: When not present or when existing smoke detectors are non-functional, install a smoke detector in the basement and on each floor in the thermal envelope. When feasible, locate the alarms in the vicinity of the sleeping area(s).			
Fire Extinguishers: not allowed with program funds			
Testing Protocols			
Auditors, crews and inspectors test units. Inoperable units are replaced per program policy.			

7.20 – Occupant Health and Safety Concerns and Conditions

Concurrence, Alternative, or Deferral			
Concurrence with Guidance ☑			
Funding			
DOE ☑	Alternative Guidance ☐	Results in Deferral ☐	
What guidance do you provide Subgrantees for soliciting the occupants' health and safety concerns related to components of their homes? 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? What guidance do you provide Subgrantees for dealing with potential health concerns when they are identified?			
	LIHEAP ☑	State ☐ Utility ☑	Other ☐

The subgrantee energy auditor notifies customers of existing and potential health and safety hazards. If a building occupant discloses any sensitivity to weatherization materials proposed for the unit, the subgrantee informs the building occupants of the possible effects of the materials and the post-weatherization conditions of their building. Whenever possible, it is the responsibility of the subgrantee to devise ways of installing materials to reduce the exposure of the participant or other occupants so that weatherization work may be performed. Possible approaches could include temporary containment areas, HEPA filtered equipment, temporary removal of the individuals that are sensitive to the materials, or alternative installation methods or materials that meet the specifications of the program.
Client Education
Customer education is an allowable T&TA expense and the Weatherization Customer Guidebook includes H&S information that is site and customer specific. Customers receive specific information when lead hazards, asbestos, or mold is noted in their homes. That information includes both federally required documents and specific information about their home on the required Health and Safety Checklist. With a signature on the Health and Safety Checklist, the customer agrees to notify the weatherization agency of any occupant health issues that may be affected by weatherization services.
Documentation Form(s) have been developed and comply with guidance? Yes ☑ No ☐
Health and Safety Checklist

7.21 – Ventilation and Indoor Air Quality

Concurrence, Alternative, or Deferral				
Concurrence with Guidance ☐				
Funding				
DOE ☑	Alternative Guidance ☑	Results in Deferral ☑		
Identify the Most Recent Version of ASHRAE 62.2 Implemented (optional: identify Addenda used)				
	LIHEAP ☑	State ☐	Utility ☑	Other ☐
Wisconsin will use ASHRAE 62.2-2016 for DOE funded units. If a customer refuses ventilation required by ASHRAE 62.2-2016, the Agency shall use discretion when proceeding with weatherization and may defer the building if there is a documented health and safety concern. If weatherization proceeds without the required ventilation, DOE funds shall not be used.				
Testing and Final Verification Protocols				
Wisconsin has developed a Diagnostic Workbook tool to assess the need for continuous ventilation. This tool was included in the audit package submitted to DOE for approval in 2018. See the Weatherization Field Guide 5.9 for detailed ventilation specifications.				

7.22 – Window and Door Replacement, Window Guards

Concurrence, Alternative, or Deferral				
Concurrence with Guidance ☐				
Funding				
DOE ☑	Alternative Guidance ☑	Results in Deferral ☐		
Funding exception: DOE funds will not be used for window guards or window replacements.				
What guidance do you provide to Subgrantees regarding window and door replacement and window guards?				
	LIHEAP ☑	State ☐	Utility ☑	Other ☐

Primary exterior doors may be replaced only as a repair measure. Photographs shall be taken to document specifically why the door was replaced. Doors may be replaced only if the door is in the primary heating envelope and has any of the following characteristics:

a) Rotting occurring on either the door jamb or the door slab;
b) Holes or cracks in the door jamb or door slab that cannot be repaired; or
c) Door repair is not feasible that will still allow the door to operate correctly.

Testing Protocols

Replacement of doors are modeled with the NEAT audit as a repair. The job must have a savings to investment ratio greater than or equal to 1.0 for a repair.

7.23 – Worker Safety (OSHA, etc.)

Concurrence, Alternative, or Deferral

Concurrence with Guidance ☑

Funding

DOE ☑ Alternative Guidance ☐ Results in Deferral ☐

How do you verify safe work practices? What is your policy for in-progress monitoring?

LIHEAP ☑ State ☐ Utility ☑ Other ☐

To comply with the Hazard Communication Standard (29 CFR 1910.1200), an internet-based Safety Data Sheet system is available for worker access to all current data sheets via Wisconsin's technical assistance contract. Safety Data Sheets are required to be available to workers in printed or digital format, and the information contained in them shall be readily accessible from a work site. Wisconsin has an internet-based SDS system for worker access to all current data sheets.

Crew and contractor safety are the responsibility of the subgrantee. In contracting with the subgrantees, the State of Wisconsin assumes compliance with all applicable federal, state, and local safety and health regulations. The Wisconsin Weatherization Program Manual includes a written policy stating services shall be deferred when the dwelling or household presents a serious crew safety concern. The subgrantee is responsible for enforcing all work rules to ensure a safe working environment for the workers, customers, and subcontractors.

Section 5.3 of the Wisconsin Weatherization Field Guide states work performed in confined spaces shall be performed in accordance to OSHA Standard 29 CFR Part 1926 Subpart AA.

The State of Wisconsin requires subgrantees to purchase and equip their crews and energy auditors with the appropriate personal protective equipment necessary to perform work tasks. Supplies and equipment purchased may include personal CO monitors, respirators, protective coveralls, safety glasses, HEPA vacuums, supplied air respirator systems, and other safety needs. Wisconsin also specifies that respirator training and fit testing are required of crew personnel and other local staff as applicable.

Administrative reviews of subgrantees include verification that OSHA worker safety requirements are being implemented (SDS, Personal Protective Equipment, lead and asbestos compliance, etc.). Onsite monitoring also includes checks that worker safety requirements are followed at in-progress jobs. Failure to comply with all state and federal safety and health regulations may result in the suspension or termination of the weatherization contract.

Training and Certification Requirements

The subgrantee is responsible for ensuring workers and subcontractors are properly trained and certified when certification is required. The Division allocates a local Training and Technical Assistance budget and provides funding for field staff to attend OSHA 10 and OSHA 30. Agencies can obtain direct trainings with a certified provider for their agency.

OSHA 10 is a required training for all field staff, and complaint inspectors. OSHA 30 is recommended for production supervisors and crew leads. All subgrantee staff are trained to applicable OSHA standards.