2026 IHCDA WAP Health & Safety Plan

1.0 – General Information

Additional information that does not fit neatly in one of the other sections of this document.
See 2026 Policy & Procedure Manual for further information • Section 3 Intake for At Risk Household definitions. • Section 4 Program Management for Health & Safety measure cost definitions. • Section 6 Funding for Health & Safety budget category expenditure policies **The 2026 WAP DOE Health & Safety Plan acts as the sole plan document on all WAP Health & Safety (H&S) Programming, superseding all previous DOE and IIJA H&S Plans.** Where subrecipients must have approval before proceeding with a Health & Safety hazard, contact IHCDA via email at iwx@ihcda.in.gov. This request must include the following: • Pictures of the Health & Safety hazard • Documentation of the Health & Safety hazard

2.0 – Budgeting

Grantees are encouraged to budget H&S costs as a separate category and, thereby, exclude such costs from the Average Cost Per Unit (ACPU) cost limitation. This separate category also allows these costs to be isolated from energy efficiency costs in program evaluations. H&S costs that are budgeted and reported under the Program Operations category rather than the H&S category, the related H&S costs must be included in the calculation of the ACPU and cost-justified through the Grantee's Department of Energy (DOE)-approved energy audit tool.	
Select which option used below.	
Separate H&S Budget ☒	Contained in Program Operations ☐

3.0 – H&S Expenditure Limits

Pursuant to 10 CFR 440.16(h), Grantees must establish H&S expenditure limits for their Program and provide justification for those limits by explaining the basis and related historical H&S expenditures. DOE acknowledges that it may be necessary for Grantees to deviate from historical expenditures when certain circumstances arise (e.g., funding source changes).

10 CFR 440.16(h)(2) dictates that these limits must be expressed as a percentage of the ACPU. To calculate this percentage, use the following formula:

$$Total\ Average\ H\&S\ Cost\ per\ Unit = \frac{H\&S\ budget\ amount}{Program\ Operations\ budget\ amount}$$

For example, if the ACPU is $5,000 and a Grantee's Program expends an average of $750 per dwelling on energy-related H&S measures, the Total Average H&S Cost per Unit would equal 15 percent. DOE acknowledges that this percentage may vary significantly between Grantees due to different geographical areas and depending upon the availability of other funding sources, resource availability, etc. Low percentages should include a statement of what other funding supports H&S costs, while larger percentages will require greater justification and relevant historical support.

15 percent is not a maximum limit on H&S expenditures. DOE will conduct a secondary level of review on H&S Plans with a Grantee request of more than 15 percent of Program Operations used for H&S purposes. ***DOE strongly encourages using the table below in developing justification for the requested H&S budget amount.*** *In accordance with 10 CFR 440.18(d)(15), these funds are to be expended by the Program in direct weatherization activities, "of which is necessary before, or because of, installation of weatherization materials." This same section of the regulation excludes the H&S costs from the ACPU limitation if H&S costs are budgeted separately.*

DOE recommends reviewing recent budget requests and compare those to actual H&S expenditures to see if previous budget estimates have been accurate. The resulting Total Average H&S Cost per Unit multiplied by the Grantee's production estimate in the Annual File should correlate to the H&S budget amount listed in the Grantee's annual plan.

H&S expenditure limits and justification explaining the basis for setting the limits.

The limit on H&S expenditures is 25% of Base Operations. This amount will cover the costs of elimination of health and safety hazards. The remaining costs will be covered by other braided funds. See the Measure Matrix for cost justification.

Utilizing the spreadsheet embedded below, provide a full list of H&S measures using historical data from your program, including average cost, and frequency rate. If installing more than a single instance of one measure in a unit (e.g. multiple CO alarms), Grantees may aggregate costs so that frequency does not exceed 100%, or enter a justification into the measure column, which explains why that measure has a frequency rate of over 100%. The spreadsheet will auto calculate your expected Total Average H&S Cost per Unit.

Instructions: Double-click icon directly below to open, view and edit Measure Matrix Spreadsheet. Complete the spreadsheet by entering the required information. To save, close the spreadsheet and it will save to this document. Alternatively, the measure matrix is also available as a standalone spreadsheet located at the following link: Weatherization Program Notice 22-7: Weatherization Health and Safety | Department of Energy

See Health & Safety Budget Worksheet

4.0 – Incidental Repair Measures

Any measures that could potentially be identified as H&S, but the Grantee chooses to instead identify and treat those measures as incidental repair measures (IRMs), must be implemented consistently throughout the Grantee's weatherization program. The measure must fit the regulatory definition of an IRM and be cost justified along with the associated energy conservation measure and/or package of measures. 10 CFR 440.3 defines Incidental Repairs as, "those repairs necessary for the effective performance or preservation of weatherization materials."

H&S measures identified and treated as IRMs within your Program.

All Incidental Repair Measures (IRMs) must be justified through the Energy Audit. IRMs must protect or help run efficiently the associated Energy Conservation Measure (ECM). The following measures are considered HSM except when the following circumstances allow them to be treated as IRMs:

- Source control in order to weatherize the unit and to ensure the long-term stability, durability, performance, and preservation of the measures. Examples of these measures are drainage, gutters, down spouts, extensions, flashing, sump pumps, dehumidifiers, landscaping, leaking roofs. If the unit requires the installation or repair of a moisture barrier, drainage, flashing, sump pump, gutters, downspouts, extensions, flashing, dehumidifiers, or landscaping to ensure the insulation in the crawlspace or sidewalls remains fully intact, the cost of installing the barrier can be included as a necessary cost as a result of installing the insulation.
- A vapor or moisture barrier if the cost is justified as part of the Energy Audit
- Minor electrical repairs, including the repair or replacement of knob and tube wiring, when associated with the installation and preservation of insulation in the attic or sidewalls
- Window and door repair, replacement, or installation is not an allowable HSM cost. These can be considered an ECM or IRM. Window or door air sealing can be an ECM, HSM, or IRM cost.
- Ductwork Repair / Replacement when required to protect the air flow to the installed ECM of a replaced heating system
- Intumescent coating may be considered when protecting an installed ECM of two component foam from ignition
- A/C system when it would protect an installed heating ECM from corrosion and moisture

5.0 – Occupant Pre-Existing or Potential Health Conditions and Hazard Identification and Notification Forms

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

- ***Occupant Pre-existing or Potential Health Condition Screening***
  - *Provides documentation that allows occupant(s) to self-report known or suspected health concerns as part of initial application for weatherization, during the energy audit, or other part of the weatherization process as specified. Must minimally contain the following:*
  - *Any known risks associated with the measures and materials being installed*
  - *Subgrantee point of contact information for occupant(s)*
  - *Date of screening*
- ***Hazard Identification Notification***
  - *Provides documentation that the occupant and landlord (if applicable), have been informed of any potential hazards identified during the energy audit or intake process. Must minimally contain the following:*
  - *Date(s) of the energy audit/assessment and when the occupant(s) (and landlord, if applicable) was informed of a potential H&S issue*
  - *A clear description of the problem, including any testing results*
  - *A statement indicating if, or when weatherization could continue*
- ***Radon Informed Consent Form***
  - *Provides documentation that the occupant(s) (and landlord if applicable) have been informed of any potential hazards associated with radon in weatherized dwellings. The form must minimally contain the following:*
  - *An explanation on the potential small risk of increasing radon levels when building tightness is improved. This is based on the results of the Buildings Assessment of Radon Reduction Interventions with Energy retrofits Expansion Study (The BEX Study)*
  - *A list of precautionary measures WAP will install based on EPA Healthy Indoor Environment Protocols.*
  - *Some of the benefits of Weatherization including energy savings, energy cost savings, improved home comfort, and increased safety.*

Procedure for soliciting occupants' health and safety concerns related to components of their homes	
Subrecipients must complete the Client Consent & Health Screening Form.	
Procedure for determining whether occupants suffer from health conditions which may be negatively impacted by the act of weatherizing their dwelling	
Subrecipients must complete the Client Consent & Health Screening Form. Denial is required if this is found to be the case.	
Procedure for addressing potential health concerns including pre-existing health conditions when they are identified	
Subrecipients must complete the Client Consent & Health Screening Form.	
Location where forms have been uploaded/submitted	
Separate Attachment to SF-424 ☒	Separate attachment to H&S Plan ☐

6.0 Health & Safety Concerns

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

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

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

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

The following definitions apply to heat sources:

- **Primary Heat Source:** The primary system is generally understood to be the unit (or system of units) most relied upon to provide heating/cooling throughout the season. These systems may or may not be centralized but do provide the majority of the heating for the home.
- **Secondary Heat Source:** Secondary systems or unit are employed only in extreme weather or as backup to the primary system and do not provide heat to the entire dwelling.

An Energy Audit must be performed prior to deciding how to categorize the cost of a heating/cooling system repair or replacement. If the measure is determined to have an SIR equal to or greater than 1, it must be charged as an ECM. If it is not determined to be an ECM, the measure may only be charged as an HSM if there is a documentable imminent threat to the client’s health and safety. Treat vented gas and liquid-fueled space heaters, and wood, coal, or pellet fired furnace and boiler systems the same as other combustion furnaces in terms of safety testing, repair, and replacement. Liquid-fueled space heaters must be removed and properly disposed of prior to weatherization in manufactured unit.

When qualifying as an HSM, the following applies for the installation, repair, or replacement of a primary heat source:

- "Red tagged," inoperable or nonexistent heating system require replacement, repair, or installation is under Formula DOE/IIJA and LIHEAP funds. If this is unable to be performed, the unit must be deferred.

- Subrecipients must first determine whether repairs can effectively be made to the heating system to enable it to operate safely, rather than require a replacement.
- Unvented space heaters acting as the primary heat source must be replaced with a vented heater. To leave a secondary unvented unit behind as a secondary source of heat, the unit must pass the Unvented Space Heating Inspection Form.
- Unsafe secondary units, including space heaters, must be repaired, or removed and disposed of, or deferral is required. Secondary unvented space heaters are considered unsafe if they:
    - Are not listed and labeled as meeting ANSI Z21.11.2
    - Have an input rating of more than 40,000 BTU/hour
    - Are in a bedroom and have an input rating of more than 10,000 BTU/hour
    - Are in a bathroom and have an input rating of more than 6,000 BTU/hour
    - Are operating in an unsafe manner (e.g., high carbon monoxide (CO) readings, too close to combustible materials, lack sufficient combustion air volume)
    - Are not permitted by the Authority Having Jurisdiction (AHJ)
- Stand-alone electric heaters cannot be left in place as a client's sole source of heat. If provisions cannot be made for the installation of a permanent heating source, the unit must be deferred.

A Manual J must be completed for every heating system replacement and in compliance with the SWS. Cooling load must be included when installing air conditioning systems such as heat pumps or mini-splits. A copy of the Manual J HVAC Load Calculation must be included in the client file. HVAC system replacements in WAP are justified by utilizing Indiana's Heating Degree Days. Climatic information is incorporated into Energy Auditing software.

Subrecipients may not continue with weatherization work until the combustion gases have been appropriately vented away from the living area.

Subrecipients must comply with the Manufactured Home Construction and Safety Standards:
- All fuel-burning appliances in manufactured homes must be installed to provide for the complete separation of the combustion system from the interior atmosphere of the manufactured home and be vented to outside the dwelling; with the exception of ranges, ovens, illuminating appliances, clothes dryers, solid fuel-burning fireplaces and solid fuel-burning stoves
- All appliances installed by or left in place after weatherization in manufactured homes must meet these standards, including secondary heating sources. If an occupant will not allow the removal of an unsafe combustion appliance from the home, deferral is required.
- Repair or replace combustion gas venting to ensure proper combustion gas venting to outside the dwelling for all combustion appliances, including but not limited to gas dryers and refrigerators, furnaces, vented space heaters, and water heaters.
- If weatherization installs an appliance that is vented into a masonry chimney, the chimney must be lined in compliance with the International Fuel Gas Code (IFGC) or local AHJ if more stringent.
- Install adequate combustion air for all combustion appliances left after weatherization.
- If permits are required for heating/cooling system work, they must be secured and are a program operation cost if the installation is an ECM or may be included in the H&S cost if installed as an HSM.
- If unsafe conditions relating to existing combustion appliances require remediation to safely perform weatherization and cannot be remedied by repair or tuning, replacement is an allowable HSM unless prevented by other guidance herein.
- Documentation justifying the replacement with a cost comparison between replacement and repair must be maintained in the client file.

Manufactured homes are required to have furnaces that draw their combustion air from outside the carriage. All new furnace installations in manufactured homes must be approved for use in manufactured housing.

<table>
<tr><th colspan="6">Allowable Actions</th></tr>
<tr><td colspan="3">WAP H&S Funds ☒</td><td colspan="3">Alternative Funds ☒</td></tr>
<tr><td colspan="6">Subrecipients may perform the following actions:
• Replace, repair, or install primary air conditioning in units where current clients have a documented medical justification by a physician, to be contained in the client file. At risk in this case is defined as having a medically verified negative health impact due to their primary air conditioning not working or functioning improperly.
• Replace primary heating systems in the following circumstances:
  o A verifiable condition exists that allows combustion gases to enter the living environment.
  o An improper application of a non-sealed combustion furnace installed in a manufactured home.
  o The cost of necessary repairs will exceed 50% of the cost of replacing the heating system.
  o The fuel source is no longer available to the client, the Subrecipient must submit a request to IHCDA requesting the change of the fuel source and heating system, and requests will be evaluated on a case-by-case basis.
  o Replacement parts are no longer produced or available.
• Repair or removal of primary and secondary solid fuel heating appliances.
• Replacement of unsafe primary solid fuel heating appliances.</td></tr>
<tr><th colspan="6">Prohibited Actions</th></tr>
<tr><td colspan="6">Concur with DOE Guidance ☒</td></tr>
<tr><td colspan="6">Subrecipients are disallowed from using WAP H&S funds for replacement or installation of secondary heat sources.</td></tr>
<tr><th colspan="6">Required Testing/Inspection</th></tr>
<tr><td colspan="2">Concur with DOE Guidance ☒</td><td colspan="2">Alternative Guidance ☒</td><td colspan="2">Results in Deferral/Referral ☐</td></tr>
<tr><td colspan="3">WAP H&S Funds ☒</td><td colspan="3">Alternative Funds ☒</td></tr>
<tr><td colspan="6">The Energy Auditor, Retrofit Mechanical Installer, Interim Inspector, and QCI must complete and sign the one of the following Heating Inspection Forms applicable to the heating system in the unit:
• Gas Heating Inspection Form
• Fuel Oil Heating Inspection Form
• Electric Heating Inspection Form
• Boiler Heating Inspection Form
• Unvented Space Heating Inspection Form

If a new gas appliance is installed, the New Gas Furnace Inspection Form must be completed and signed by the Retrofit Mechanical Installer, Interim Inspector, and QCI.

The following must be a part of the inspection:
• Verify that primary heating systems are present, operable, and performing correctly.
• Conduct combustion appliance testing and visual inspection of all combustion appliances and their related venting.
• Depressurization and spillage testing is required for all Category 1 appliances pre- and post-weatherization and before leaving the unit on any day when work has been done that could affect draft.
• CO testing for all combustion appliances, regardless of venting type
• Verify proper clearances for all combustion venting types
• Visually inspect the entirety of solid fuel-fired appliance installations including the venting system to ensure it adheres to the applicable code or local authority having jurisdiction. Appliances must be inspected pre- and post-weatherization.
• Conduct pre- and post- weatherization worst case CAZ depressurization testing in spaces having a fireplace or woodstove,
• Safety inspections related to space heaters, fireplaces, and woodstoves must include, but not be limited to, verification of adequate floor protection, and code-compliant clearances to walls</td></tr>
</table>

and other combustible materials.

- The rated and measured BTU input of each combustion appliance
- A complete electrical inspection of the furnace including proper grounding, polarity, wiring connections, fuse type and size, element amperage, disconnect requirements and conduit requirements
- An inspection of all fuel lines in the unit from the source to the combustion appliance or line termination. This includes all fittings, connections, shut-off valves, gas valves, sediment traps and end caps
- A visual check for flame interference
- A test of the setting and operation of the high limit control switch
- An evaluation of the adequacy of combustion air for combustion appliances
- A check that there are no open return air ducts/leaks in the Combustion Appliance Zone
- An inspection, and replacement if necessary, of the furnace filter
- Daily Safety Test Out Form

Grantee Combustion Testing Action Levels

Follows ANSI-BPI-1200 determined action levels

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

Decommissioning of an unvented space heater

In the event an unvented space heater is required to be removed from the unit the following must be completed:

- Remove unvented space heater from the unit
- Equipment will be disposed of in accordance with local laws and regulations, recycling materials when feasible
- Gas line shall be removed and capped as close to branch tee as possible
- Cap shall be tested for gas leaks after gas line is removed

Decommissioning of abandoned vent systems

When vent systems are no longer being utilized, the following must be completed for:

- Masonry Chimney: Vent connectors must be removed. Interior masonry chimney connector opening must be sealed with metal cap, cement/mortar, or a combination of metal cap and cement/mortar.
- Type B-vent and Manufactured Vent System: Vent sections must be removed as far away from disconnection as practical, (i.e. typically at ceiling level) and sealed with a metal cap
- The decommissioned vents must be tagged as “Unsafe To Use”

Decommissioning of gas fireplace

- Gas line shall be removed and capped as close to branch tee as possible
- Cap shall be tested for gas leaks after gas line is removed
- Depending on the vent system type, refer below to applicable protocols:
    - Type B-vent and Manufactured Vent System: Vent sections must be removed as far away from disconnection as practical, (i.e. typically at ceiling level) and sealed with a metal cap
- The decommissioned vent must be tagged as “Unsafe To Use”

Decommissioning of solid fuel open hearth fireplace

Exterior

- Cover chimney top with a chimney cap with an animal screen/guard
- Top of chimney should not be permanently disabled/airsealed
- Safety of WAP Professionals is paramount
- If a chimney cap is not a feasible option, subrecipient must include meaningful photographs and written justification in the file.

Interior

- Install foam board and drywall with a support structure to ensure durability

- The decommissioned fireplace must be tagged as "Unsafe to Use"

When a solid fuel open hearth fireplace is present, the blower door must be operated at 300 cfm to simulate a fire in the fireplace. If open hearth fireplace is left operating post weatherization, it must be inspected by a qualified chimney sweep and must be deemed safe to use. A copy of this letter must be placed in the client file.

The Worst-Case CAZ Depressurization limit for a wood stove which obtains combustion air from the unit is -4.0 Pascals of pressure. The Worst-Case CAZ Depressurization limit for an EPA approved direct vent wood stove is -10.0 Pascals of pressure. If either of these limits are met or exceeded, the respective wood stove will require decommissioning. A copy of the Gas Heating Inspection Form for all of the above-mentioned ventilations systems must be in the client file.

Required Client Education

Concur with DOE Guidance ☒	Alternative Guidance ☐

Subrecipients must perform the following:

- Appropriate use and maintenance of units.
- Go over Gas Heating Inspection Form.
- Provide all paperwork and manuals for any equipment installed.
- Discuss and provide information on proper disposal of bulk fuel tanks when not removed as part of the weatherization work.
- Where combustion equipment is present, provide combustion safety and hazards information including how to recognize depressurization, dangers of CO poisoning, and fire risks associated with combustion appliance use, including the importance of using exhaust ventilation when cooking and the importance of keeping burners clean to limit CO production.

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

Required Actions

Concur with DOE Guidance ☒	Alternative Guidance ☒	Results in Deferral/Referral ☐

WAP H&S Funds ☒	Alternative Funds ☒

When suspected friable Asbestos Containing Materials (ACM) are present, including vermiculite, assume they contain asbestos and take precautionary measures to prevent disturbing it during the Energy Audit and weatherization work unless testing determines otherwise.

Grantee ACM Policy

<u>Vermiculite</u>

If vermiculite insulation is found in a unit and that vermiculite insulation will require disturbance in order to complete weatherization activities, then the vermiculite insulation must either:

- Be tested by an AHERA professional to determine if asbestos is present or
- Must be assumed to contain asbestos.

If it is tested and the results are positive, then either (a) the ACM must be removed in accordance with WPN 22-7 guidance prior to weatherization activities commencing or (b) the unit must be deferred and remediated before weatherization can continue.

- When vermiculite is present and it is determined that testing will be completed testing is required by an AHERA or other appropriate asbestos control professional.
- If asbestos is present, the unit must be able to be weatherized without asbestos disturbance. If it can't, then it must be deferred.
- Blower door pressurization test is required. Do not perform a blower door depressurization test.
- Use proper respiratory protection while in areas containing vermiculite.
- Encapsulation by an appropriately trained asbestos control professional is allowed.
- Removal is not an allowable cost.

<u>Pipes, Furnaces, other small, covered surfaces</u>

- Assume asbestos is present in suspect covering materials.
- When suspected friable ACM is present, take precautionary measures as if it is asbestos

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unless testing determines otherwise.

Encapsulation by an appropriately trained asbestos control professional is allowed and may be conducted prior to blower door testing if the materials are friable.
Subrecipient may be allowed to remove by an appropriately trained professional on a case-by-case basis.
Charge only those costs directly associated with the testing, encapsulation, or removal to the H&S budget category.

</td></tr>
<tr><td colspan="6">Grantee Blower Door Testing Policy When Suspected ACM Exists</td></tr>
<tr><td colspan="6">Subrecipients must not perform a blower door depressurization test in a unit where friable asbestos, suspected asbestos containing insulation or vermiculite are present. Unless the suspect material has tested negative for asbestos, a blower door pressurization test must be performed, and must be documented in the client file.</td></tr>
<tr><td colspan="6">Allowable Actions</td></tr>
<tr><td colspan="3">WAP H&S Funds ☐</td><td colspan="3">Alternative Funds ☐</td></tr>
<tr><td colspan="6">
Subrecipients may perform the following:

Temporary removal and reinstallation of ACM siding to perform an ECM
Limited encapsulation or removal of suspected ACM on small surfaces by an appropriately trained asbestos control professional if necessary to safely weatherize the unit.

</td></tr>
<tr><td colspan="6">Prohibited Actions</td></tr>
<tr><td colspan="6">Concur with DOE Guidance ☒</td></tr>
<tr><td colspan="6">Subrecipients are disallowed from using WAP H&S funds for general abatement/removal/or replacement of asbestos siding, thermal system insulation (TSI) or Transite, or vermiculite.</td></tr>
<tr><td colspan="6">Required Testing/Inspection</td></tr>
<tr><td colspan="2">Concur with DOE Guidance ☐</td><td colspan="2">Alternative Guidance ☐</td><td colspan="2">Results in Deferral/Referral ☐</td></tr>
<tr><td colspan="3">WAP H&S Funds ☐</td><td colspan="3">Alternative Funds ☐</td></tr>
<tr><td colspan="6">Visually inspect all surfaces for suspected ACM prior to drilling or cutting. Assume asbestos is present in suspect materials unless testing reveals otherwise.</td></tr>
<tr><td colspan="6">Allowable Testing/Inspection</td></tr>
<tr><td colspan="3">WAP H&S Funds ☐</td><td colspan="3">Alternative Funds ☐</td></tr>
<tr><td colspan="6">
Subrecipients may perform the following:

Sample collection and testing of suspected ACM conducted by an Asbestos Hazard Emergency Response Act of 1986 (AHERA) certified tester.
Baseline indoor environmental asbestos sampling.

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<tr><td colspan="6">Required Client Education</td></tr>
<tr><td colspan="3">Concur with DOE Guidance ☒</td><td colspan="3">Alternative Guidance ☒</td></tr>
<tr><td colspan="6">
Subrecipients must formally notify the occupant, and landlord if applicable, in writing:

Suspected ACMs that are present and what precautions will be taken to ensure the clients' and WAP Professionals' safety during weatherization
Results if testing was performed
not to disturb suspected ACM
Client, or landlord if applicable, must provide documentation that a certified professional performed the deferral remediation before work continues, unless Readiness or other subrecipient deferral remediation funding can be utilized.

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6.3 – Biologicals and Unsanitary Conditions

<table>
<tr><td colspan="6">Required Actions</td></tr>
<tr><td colspan="2">Concur with DOE Guidance ☒</td><td colspan="2">Alternative Guidance ☐</td><td colspan="2">Results in Deferral/Referral ☒</td></tr>
<tr><td colspan="3">WAP H&S Funds ☐</td><td colspan="3">Alternative Funds ☒</td></tr>
<tr><td colspan="6">Deferral where conditions in the unit pose a health risk to client and/or WAP Professionals or may be worsened by weatherization activities and will not be resolved by weatherization.</td></tr>
<tr><td colspan="6">Allowable Actions</td></tr>
<tr><td colspan="3">WAP H&S Funds ☒</td><td colspan="3">Alternative Funds ☒</td></tr>
</table>

<table>
<tr><td colspan="6">Subrecipients may perform the following:
• Limited remediation of conditions that may lead to or promote biological concerns and unsanitary conditions.
• Limited cleaning of the workspace to protect the health and safety of WAP Professionals and clients</td></tr>
<tr><th colspan="6">Required Testing/Inspection</th></tr>
<tr><td colspan="2">Concur with DOE Guidance ☒</td><td colspan="2">Alternative Guidance ☐</td><td colspan="2">Results in Deferral/Referral ☐</td></tr>
<tr><td colspan="3">WAP H&S Funds ☒</td><td colspan="3">Alternative Funds ☒</td></tr>
<tr><td colspan="6">Sensory inspection of interior, exterior, attics, and subspaces of the dwelling.</td></tr>
<tr><th colspan="6">Required Client Education</th></tr>
<tr><td colspan="3">Concur with DOE Guidance ☒</td><td colspan="3">Alternative Guidance ☒</td></tr>
<tr><td colspan="6">Inform client in writing of observed biological and unsanitary conditions. Energy Auditors will provide information on how to maintain a sanitary unit and steps to correct deferral conditions. When deferral is necessary, provide information in writing describing conditions that must be met for weatherization to commence.</td></tr>
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6.4 – Building Structure and Roofing (e.g., roofing, wall, foundation)

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<tr><th colspan="6">Allowable Actions</th></tr>
<tr><td colspan="3">WAP H&S Funds ☒</td><td colspan="3">Alternative Funds ☒</td></tr>
<tr><td colspan="6">Subrecipients may perform minor repairs and installation may be conducted only when the health and safety of the client or WAP Professionals are at risk, or necessary to effectively weatherize the unit; otherwise, these measures are not allowed. Allowable or “minor” structural and roofing repairs are considered as either HSMs or IRMs. Units that require more than minor repairs must be deferred.</td></tr>
<tr><th colspan="6">Prohibited Actions</th></tr>
<tr><td colspan="6">Concur with DOE Guidance ☒</td></tr>
<tr><td colspan="6">Subrecipients are disallowed from using WAP H&S funds for major repairs or building rehabilitation.</td></tr>
<tr><td colspan="6">Define “major” repair</td></tr>
<tr><td colspan="6">A repair exceeding $1,200 for one measure is considered a major repair.</td></tr>
<tr><th colspan="6">Required Testing/Inspection</th></tr>
<tr><td colspan="2">Concur with DOE Guidance ☒</td><td colspan="2">Alternative Guidance ☐</td><td colspan="2">Results in Deferral/Referral ☐</td></tr>
<tr><td colspan="3">WAP H&S Funds ☒</td><td colspan="3">Alternative Funds ☒</td></tr>
<tr><td colspan="6">Subrecipients must conduct a visual inspection of building structure and roofing for damages that compromise building durability and to verify that portions of the home where weatherization will occur are safe for entry and performance of assessments, work, and inspections.</td></tr>
<tr><th colspan="6">Prohibited Testing/Inspection</th></tr>
<tr><td colspan="6">Concur with DOE Guidance ☒</td></tr>
<tr><td colspan="6">Subrecipients are disallowed from using WAP H&S funds for any testing/evaluation of structural materials by a third party.</td></tr>
<tr><th colspan="6">Required Client Education</th></tr>
<tr><td colspan="3">Concur with DOE Guidance ☒</td><td colspan="3">Alternative Guidance ☒</td></tr>
<tr><td colspan="6">Notify client in writing of structurally compromised areas. When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.</td></tr>
</table>

6.5 – Code Compliance

<table>
<tr><th colspan="6">Allowable Actions</th></tr>
<tr><td colspan="3">WAP H&S Funds ☒</td><td colspan="3">Alternative Funds ☒</td></tr>
<tr><td colspan="6">When correction of preexisting code compliance issues are triggered by weatherization measures being installed in a specific room or area of the home. If the installation of a weatherization measure triggers the correction of a preexisting code compliance issue, and is paid for with WAP funds, the specific code requirements with reference to the WAP measure that triggered the code compliance issue must be documented in the client file and follow State or AHJ codes during weatherization work. If it is determined that the code compliance issue cannot be resolved using weatherization funds, the</td></tr>
</table>

unit must be deferred.

Prohibited Actions
Concur with DOE Guidance ☒
Subrecipients are disallowed from using WAP H&S funds for the following: • Correction of preexisting code compliance issues not directly related to the installation of specific weatherization measures in the home. • Work on condemned properties and properties where H&S conditions exist that cannot be corrected under this guidance.

Required Testing/Inspection		
Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
WAP H&S Funds ☒	Alternative Funds ☒	
Visual inspection.		

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

6.6 – Electrical

Required Actions		
Concur with DOE Guidance ☒	Alternative Guidance ☒	Results in Deferral/Referral ☐
WAP H&S Funds ☒	Alternative Funds ☒	
Provide sufficient over-current protection and damming prior to insulating building components containing knob and tube wiring, as required by the AHJ. Energy Auditors will identify any knob and tube wiring found in the unit and test it to see if it is live. If knob and tube integrity is questionable, have it inspected by an electrician.		

Allowable Actions	
WAP H&S Funds ☒	Alternative Funds ☒
Minor electrical repairs to protect the occupant or workers from electrical hazards within the living area or in the immediate area where weatherization activities will occur. Generally defined as, but not limited to, the following: • Installation of junction boxes and covers • Flagging of junction boxes • Replacement of broken outlets and switches • Shielding of knob and tube wiring	

Prohibited Actions
Concur with DOE Guidance ☒
Subrecipients are disallowed from using WAP H&S funds for major repairs.
Define "major" repairs
A repair exceeding $1,200 for one measure is considered a major repair. Major electrical repairs are further defined as the following: • Replacement of an electrical panel • New incoming service • Completely rewiring a unit

Required Testing/Inspection		
Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
WAP H&S Funds ☒	Alternative Funds ☒	
Subrecipients must conduct the following: • Visual inspection for presence and condition of knob-and-tube wiring. • Evaluate knob-and-tube wiring for safety prior to work. • Check for alterations that may create an electrical hazard.		

Allowable Testing/Inspection		
WAP H&S Funds ☒	Alternative Funds ☒	
Subrecipients may perform voltage drop and voltage detection testing.		
Required Client Education		
Concur with DOE Guidance ☒	Alternative Guidance ☒	
When electrical issues are the cause of a deferral, auditors will provide clients with information on over-current protection, overloading circuits, and basic electrical safety and risks.		

6.7 – Fuel Leaks

Required Actions		
Concur with DOE Guidance ☒	Alternative Guidance ☒	Results in Deferral/Referral ☐
WAP H&S Funds ☒	Alternative Funds ☒	
When a gas leak is found on the utility side of service, the utility service must be contacted, work must be temporarily halted, and the leak must be repaired before work may proceed. Fuel leaks that are the responsibility of the client (vs. the utility) must be repaired before installing weatherization measures in the home.		
Allowable Actions		
WAP H&S Funds ☒	Alternative Funds ☒	
Subrecipients may perform the following: • Replacement or repair of leaking bulk fuel tanks and/or lines if connected systems will remain after weatherization. • Replacement of flexible appliance gas connectors that are not compliant with current fuel gas codes.		
Prohibited Actions		
Concur with DOE Guidance ☒		
Subrecipients are disallowed from using WAP H&S funds for the following: • Repair leaks that are the responsibility of the utility to correct. • Environmental cleanup resulting from bulk fuel leaks		
Required Testing/Inspection		
Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
WAP H&S Funds ☒	Alternative Funds ☒	
Subrecipients must conduct the following: • Test all exposed gas lines, fittings, valves, and connections for fuel leaks from utility connection to the appliance throughout the home • Test all gas appliances for fuel leaks at all connections, valves, fittings, and burners • Conduct sensory inspection of all bulk fuels lines and storage tanks to determine if leaks exist • Confirm gas leak with bubbles.		
Prohibited Testing/Inspection		
Concur with DOE Guidance ☒		
Subrecipients are disallowed from using WAP H&S funds for environmental testing of soil or water.		
Required Client Education		
Concur with DOE Guidance ☒	Alternative Guidance ☐	
Inform client in writing of fuel leak testing results, including specific location if fuel leaks are detected.		

6.8 – Gas Ovens/Stovetops/Ranges

Allowable Actions	
WAP H&S Funds ☒	Alternative Funds ☒
Limited cleaning or repair of ovens, stovetops, or ranges when testing indicates a problem.	
Prohibited Actions	
Concur with DOE Guidance ☒	
Subrecipients are disallowed from using WAP H&S funds for gas oven, stovetop, or range	

replacement.

Required Testing/Inspection

Concur with DOE Guidance ☒	Alternative Guidance ☒	Results in Deferral/Referral ☐

WAP H&S Funds ☒	Alternative Funds ☒

Test gas ovens for CO. Visually inspect cooking burners and ovens for operability and flame quality.

The Gas Cook Stove Inspection Form must be completed to ensure proper inspection of the stove. The Energy Auditor and QCI must complete and sign the form. The Retrofit Mechanical Installer must complete and sign the form if work has been completed on the stove.

Define action levels for oven CO testing and resulting actions

Turn on the oven and then stove top burners to high one-by-one.

Stove Tops

Test stove top burners by holding the test probe approximately 8 inches above the flame. If CO levels exceed 100 ppm as measured on any one burner at a minimum a kitchen rated CO alarm must be installed in the same room as the appliance and perform client education on use of the range.

Ovens

Test oven burner at its outlet. If CO levels exceed 225 ppm as measured, install a kitchen-rated CO alarm in the same room as the appliance. Install a minimum 100 cfm kitchen exhaust fan to vent the CO to the exterior or replace the range with non-WAP H&S Funds.

Required Client Education

Concur with DOE Guidance ☒	Alternative Guidance ☐

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

6.9 – Hazardous Materials

Required Actions

Concur with DOE Guidance ☐	Alternative Guidance ☐	Results in Deferral/Referral ☐

WAP H&S Funds ☐	Alternative Funds ☐

Hazardous Waste Materials generated by weatherization work must be disposed of according to all local and federal laws, regulations, and guidelines, as applicable. Costs specifically related to disposal may be charged as an HSM. Subrecipients must document disposal requirements in contract language with the responsible party.

Limited removal of pollutants that pose a risk to workers is required. If removal cannot be performed or is not allowed by the client, the unit must be deferred or denied.

Air sealing can be considered an HSM when separating the house-garage wall.

Define "limited" removal of pollutants

Removal of pollutants is limited to those that pose a risk to WAP Professionals or occupants and would not otherwise result in deferral. Hazardous pollutants include but are not limited to the following:

- Formaldehyde
- Volatile Organic Compounds (VOCs)
- Flammable Liquids
- Refrigerant
- Mercury
- CFL
- Fluorescents

Allowable Actions

WAP H&S Funds ☒	Alternative Funds ☒

Limited removal of pollutants that pose a risk to the client.

Prohibited Actions		
Concur with DOE Guidance ☒		
Subrecipients are disallowed from using WAP H&S funds for lead, asbestos, and radon abatement.		

Required Testing/Inspection		
Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
WAP H&S Funds ☒	Alternative Funds ☒	
Sensory inspection.		

Prohibited Testing/Inspection
Concur with DOE Guidance ☒
Subrecipients are disallowed from using WAP H&S funds to conduct testing for hazardous materials other than that specifically permitted in the asbestos, lead, and radon sections of this document.

Required Client Education	
Concur with DOE Guidance ☒	Alternative Guidance ☒
Inform occupant in writing of the following: • Hazards associated with hazardous waste materials being generated/handled in the home • Observed hazardous condition and associated risks. Provide client written materials on safety issues and proper disposal of household pollutants. When deferral or denial is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.	

6.10 - Injury Prevention of Occupants

Allowable Actions	
WAP H&S Funds ☒	Alternative Funds ☒
Minor repairs and installations, such as repairing stairs, replacing handrails. The client must review and filling out the Client Consent & Health Screening Form to disclose their refusal of products or measures that may deem a potential negative health impact. Failure or the inability to take appropriate actions must result in denial.	

Prohibited Actions
Concur with DOE Guidance ☒
Subrecipients are disallowed from using WAP H&S funds for major repairs
Define "major" repairs
A repair exceeding $1,200 for one measure is considered a major repair.

Required Testing/Inspection		
Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
WAP H&S Funds ☒	Alternative Funds ☒	
Visually inspect for dangers that would prevent weatherization.		

Required Client Education	
Concur with DOE Guidance ☒	Alternative Guidance ☐
Inform clients in writing of any known risks utilizing the Client Consent & Health Screening Form. When deferral or denial is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.	

6.11 – Lead-Based Surface Coverings (Paint, Varnishes, Roofing, etc.)

Required Actions		
Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
WAP H&S Funds ☒	Alternative Funds ☒	
WAP Professionals working in units must adhere to safe work practices including appropriate use of Personal Protective Equipment (PPE) and safety procedures per OSHA and applicable regulations/laws including, but not limited to, EPA, OSHA, 29 CFR 1910 and 29 CFR 1926. All WAP		

<table>
<tr><td colspan="2">Professionals are required to receive proper PPE before engaging in any lead renovation activities.

Subrecipients who obtain Pollution Occurrence Insurance cannot exclude lead if Formula DOE/IIJA funds are used to purchase the policy. If subrecipients do not obtain POI coverage and damage occurs or there is disturbance to any other environmental pollutants, the cost of remediation, clean up, relocation, medical expenses, or any other resulting costs may not be charged to Formula DOE/IIJA and must be covered by another funding source.

All subrecipients must obtain and maintain Lead Safe Certified Firm status through the EPA, renewed every 5 years. If a contractor performs weatherization activities in a pre-1978 unit, they must obtain Lead Safe Certified Firm status. No subrecipient or contractor may perform, offer, or claim to perform renovations covered by 40 CFR 745.89 without EPA certification. Subrecipients may check their status through EPA's Lead Renovation/ Abatement Firm Certification Application or Update. All Lead Firms are verified during the annual monitoring process.

Any work that disturbs lead based paint above the de minimis levels must be performed or directed by a Certified Renovator (RRP) employed by a Lead Safe Certified Firm, as required by 40 CFR 745.89 and 40 CFR 745.90. Other workers may assist as long as they are trained by the Certified Renovator. The Certified Renovator must be on site for setup and cleanup and must be available by phone while the work is being performed. Subrecipients must verify the following documentation when performing weatherization activities above the de minimus levels:
• EPA RRP certification of Certified Renovator
• EPA Lead Safe Firm certificate
• Lead Renovation Recordkeeping Checklist
• Photographs of Lead Safe Work Practices
• Lead Inspection Report, completed by XRF Designee, verifying lead-based paint is not present
• Client-signed receipt of EPA Renovate Right within 60 days of the start of Lead Safe work
• Client-signed Client Consent & Health Screening Form, or certificate of mailing form to client

Deferral is required when extent and conditions would create a potential negative health impact.</td></tr>
<tr><th colspan="2">Prohibited Actions</th></tr>
<tr><td colspan="2">Concur with DOE Guidance ☒</td></tr>
<tr><td colspan="2">Subrecipients are disallowed from using WAP H&S funds for the following:
• Lead abatement
• Purchase, resourcing, or maintenance of X-ray Fluorescence (XRF) devices.</td></tr>
<tr><th colspan="2">Allowable Testing/Inspection</th></tr>
<tr><td>WAP H&S Funds ☒</td><td>Alternative Funds ☒</td></tr>
<tr><td colspan="2">Testing to determine the presence of lead in paint that will be disturbed by performed measures must follow EPA-approved methods. If EPA-approved testing is not conducted, subrecipients may assume lead is present and work in compliance with EPA RRP rules. All units built pre-1978 are required to be tested for the presence of lead prior to any work commencing, including deferral remediation work.

Subrecipients who use the X-Ray Fluorescence Spectrometer (XRF) analyzer for resourcing and leak testing must maintain training. The XRF designee may train fellow WAP Professionals in the use of handling the XRF analyzer. Further lead safe training can be provided by the WAP Training Provider.

All XRF analyzers must have a current Performance Characteristic Sheet (PCS) in order to be used for lead inspection. Work done after a lead inspection using XRF analyzer without a current PCS, or do not follow PCS requirements, will be considered invalid and require rework. Subrecipients can obtain a current PCS through the National Lead Information Center Clearinghouse (1-800-424-LEAD).

If above de minimus levels, the WAP Manager or XRF Designee must prepare a Lead Inspection Report, and must have a copy of this repot in the client file, as well as having it available to WAP Professionals working on the unit. The following information must be included in the Lead Inspection Report.</td></tr>
</table>

- Unit's year built
- Unit's address
- Name of XRF Trained Handler
- Name of Lead Inspector
- Lead testing instrument, including serial number
- XRF Report, including calibrations
- Description of areas tested

The EPA CR may utilize an EPA Lead Test Kit to determine if lead is present in areas not tested by the XRF analyzer and will be disturbed by weatherization activities. IHCDA's lead safe policy follows 24 CFR 35.1350 for the following:

- Prohibited methods
- Occupant protection and worksite preparation
- Specialized cleaning
- De minimus levels

Required Client Education	
Concur with DOE Guidance ☒	Alternative Guidance ☒

Follow pre-renovation education provisions for EPA RRP Program. When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

6.12 – Mold and Moisture

Allowable Actions	
WAP H&S Funds ☒	Alternative Funds ☒

Subrecipients may perform the following:

- Limited water damage repairs that can be addressed by weatherization workers are allowed when necessary to weatherize the home and to ensure the long-term stability and durability of the measures
- Source control when necessary, to weatherize the home and to ensure the long-term stability and durability of the measures. Source control is independent of latent damage and related repairs. Source control includes, but is not limited to venting dryers, site drainage, gutters, down spouts, extensions, flashing, sump pumps, dehumidifiers, landscape, leaking roofs, vapor retarders, moisture barriers, etc.
- Window and door repairs are allowed with H&S funds to resolve a bulk water intrusion issue that is the cause of visible biological growth and in compliance with WPN 19-5.
- Air sealing may be charged to HSM only when done to stop bulk moisture intrusion that does not reduce the blower door.

The Moisture & Home Assessment Form must be utilized to document all moisture and sanitation issues found. The Pre-Auditor or Energy Auditor, Crew Leader, and QCI must complete and sign the form. Where issues cannot be addressed, deferral is required.

Prohibited Actions
Concur with DOE Guidance ☒

Subrecipients are disallowed from using WAP H&S funds for the following

- Mold cleanup
- Window and door replacements

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

Visual inspection for moisture or mold damage including exterior drainage.

Required Client Education	
Concur with DOE Guidance ☐	Alternative Guidance ☐

Provide client written notification of identified mold/moisture hazards and information regarding the

associated hazard.

6.13 - Occupant Pre-existing or Potential Health Conditions

Required Actions		
Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☒
WAP H&S Funds ☐	Alternative Funds ☐	
When a person’s health may be at risk and/or WAP work activities could constitute a health and safety hazard, the client is required to take appropriate action based on severity of risk. Denial, if client risk cannot be mitigated.		
Allowable Actions		
WAP H&S Funds ☒	Alternative Funds ☒	
Occupant temporary relocation costs on a case-by-case basis, following the defined: • Allowable costs: • Relocation options: • Procedure for case-by-case determination: • Documentation requirements from the client:		
Required Testing/Inspection		
Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
WAP H&S Funds ☒	Alternative Funds ☒	
Screen client for known or suspected health concerns either as part of initial application for weatherization, during the audit, or both using the Client Consent & Health Screening Form.		
Required Client Education		
Concur with DOE Guidance ☐	Alternative Guidance ☐	
Inform client in writing of any known risks and subrecipient point of contact. Provide the Client Consent & Health Screening Form.		

6.14 – Pests

Required Actions		
Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☒
WAP H&S Funds ☒	Alternative Funds ☒	
Deferral of unit where infestation of pests cannot be reasonably removed or poses a health and safety concern for WAP Professionals and client.		
Allowable Actions		
WAP H&S Funds ☒	Alternative Funds ☐	
Limited pest removal is allowed only where infestation would prevent weatherization. Screening of windows and points of access, and incorporating pest exclusion into air sealing practices to prevent intrusion is allowed		
Required Testing/Inspection		
Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
WAP H&S Funds ☒	Alternative Funds ☒	
Visual inspection of presence and degree of infestation and risk to WAP Professionals and client.		
Required Client Education		
Concur with DOE Guidance ☒	Alternative Guidance ☐	
Inform client in writing of observed conditions and associated risks. When deferral is necessary, provide information in writing describing condition that must be met in order for weatherization to commence.		

6.15 – Radon

Required Actions		
Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐

WAP H&S Funds ☒	Alternative Funds ☒
Subrecipients must perform the following: • Cover exposed dirt floors within the pressure/thermal boundary with a sealed soil gas retarder • Cover sump well/pits with airtight covers • Implement ventilation as required by ASHRAE 62.2-2016	
Allowable Actions	
WAP H&S Funds ☒	Alternative Funds ☒
Subrecipients may perform the following: • In units where radon may be present, work scope may include additional precautionary measures based on EPA Healthy Indoor Environment Protocols for Home Energy Upgrades. • Other precautions may include, but are not limited to, sealing any observed floor and/or foundation penetrations, isolating the basement from the conditioned space, and ensuring crawl space venting is installed and operable.	
Prohibited Actions	
Concur with DOE Guidance ☒	
Subrecipients are disallowed from using WAP H&S funds for radon mitigation.	
Required Client Education	
Concur with DOE Guidance ☒	Alternative Guidance ☒
Provide client the EPA's A Citizen's Guide to Radon and inform them of radon related risks. Client must sign the Client Consent & Health Screening Form prior to receiving weatherization activities.	

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

Required Actions		
Concur with DOE Guidance ☒	Alternative Guidance ☒	Results in Deferral/Referral ☐
WAP H&S Funds ☒	Alternative Funds ☒	
Smoke Alarms • Each unit is required to have at least one smoke alarm on each level near the bedrooms. • Energy Auditors must check the functionality and expiration date on all existing smoke alarms. CO Alarms • Install CO alarms in every home where alarms are not present or are inoperable in compliance with ASHRAE 62.2-2016 which references NFPA 720. • All weatherized units must contain at least one CO alarm per floor, including all electric units. • Energy Auditors must check the functionality and expiration date on all existing CO alarms. All CO alarms must be installed per manufacturer specifications.		
Allowable Actions		
WAP H&S Funds ☒	Alternative Funds ☒	
Subrecipients may perform the following: • Install smoke alarms where the AHJ requires them if alarms are not present or are inoperable. • Replace functional smoke alarms and carbon monoxide alarms if they are beyond the manufacturer's stated lifetime (usually 10 years). • Replace functional smoke or CO alarms batteries if designed to be replaceable. • Provide fire extinguishers where solid fuel burning equipment is present.		
Prohibited Actions		
Concur with DOE Guidance ☒		
Subrecipients are disallowed from using WAP H&S funds for replacement of functional smoke or CO alarms that are not beyond the manufacturer's stated lifetime.		

Required Testing/Inspection		
Concur with DOE Guidance ☒	Alternative Guidance ☒	Results in Deferral/Referral ☐
WAP H&S Funds ☒	Alternative Funds ☒	
Verify operation and age of installed alarms. When solid fuel burning equipment is present and there is an existing fire extinguisher present, check the expiration date. If the fire extinguisher is expired, provide client with new fire extinguisher.		

Required Client Education	
Concur with DOE Guidance ☒	Alternative Guidance ☐
Provide client with verbal and written information on use of newly installed devices and the potential risks of not properly maintaining these devices.	

6.17 – Ventilation and Indoor Air Quality

Required Actions		
Concur with DOE Guidance ☒	Alternative Guidance ☐	Results in Deferral/Referral ☐
WAP H&S Funds ☒	Alternative Funds ☒	
Install ventilation as required by ASHRAE 62.2 - 2016. If client refuses ventilation as required by ASHRAE 62.2, the home must be denied.		

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

Subrecipients must conduct the following:

- ASHRAE 62.2 evaluation to determine required post-weatherization ventilation at the Energy Audit. The same calculator must be used during the QC Inspection to verify compliance. ASHRAE 6.2.2 evaluation must be documented in the WAP Database.
- Measure fan flow of existing fans and of installed equipment to verify performance.

Required Client Education	
Concur with DOE Guidance ☒	Alternative Guidance ☐

Subrecipients must provide the following:

- Information on function, use, and maintenance (including location of service switch and cleaning instructions) of ventilation system and components
- Equipment manuals for installed equipment.
- Disclaimer that ASHRAE 62.2 does not account for high polluting sources or guarantee indoor air quality.

6.18 – Water Heaters

(see Combustion Appliances for combustion related requirements)

Allowable Actions	
WAP H&S Funds ☒	Alternative Funds ☒

Subrecipients may perform the following:

- Limited case-by-case replacement of water heaters if the water heater poses a life-safety risk to client from issues such as leaking primary tank or high CO measurements.
  - Repair cannot yield a safe water heater
  - There are electrical hazards
  - Beyond cost effective repair (more than 50% the cost to replace)
- Minor safety repairs of water heaters if the components such as T&P valve piping, backflow prevention devices, and expansion tanks
- Replace, repair, or install primary water heater heaters when existing primary water heater is unsafe, inoperable, or nonexistent. Replaced primary water heaters must be EnergyStar or equivalent certified

<table>
<tr><th colspan="6">Required Testing/Inspection</th></tr>
<tr><td colspan="2">Concur with DOE Guidance ☒</td><td colspan="2">Alternative Guidance ☐</td><td colspan="2">Results in Deferral/Referral ☐</td></tr>
<tr><td colspan="3">WAP H&S Funds ☒</td><td colspan="3">Alternative Funds ☒</td></tr>
<tr><td colspan="6">Visual inspection of all water heaters and related piping for safety and leaks. Complete the appropriate Heating Inspection Form. See WAP H&S Plan Section 6.1 Appliances for related combustion safety testing requirements.</td></tr>
<tr><th colspan="6">Required Client Education</th></tr>
<tr><td colspan="3">Concur with DOE Guidance ☒</td><td colspan="3">Alternative Guidance ☐</td></tr>
<tr><td colspan="6">Subrecipients must provide the following:
• Information on appropriate use and maintenance of units.
• Paperwork and manuals for any installed equipment.

Where combustion equipment is present, provide combustion safety and hazards information including how to recognize depressurization, dangers of CO poisoning, and fire risks associated with combustion appliance use.</td></tr>
</table>

6.19 – Worker Safety

<table>
<tr><th colspan="6">Required Actions</th></tr>
<tr><td colspan="2">Concur with DOE Guidance ☒</td><td colspan="2">Alternative Guidance ☒</td><td colspan="2">Results in Deferral/Referral ☐</td></tr>
<tr><td colspan="3">WAP H&S Funds ☒</td><td colspan="3">Alternative Funds ☒</td></tr>
<tr><td colspan="6">WAP Professionals must follow all federal, state, and local safety regulations, such as OSHA and EPA. Subrecipients must be in compliance with the current OSHA Hazard Communication Standard (HAZCOM Standard), including on-site organized Safety Data Sheets (SDS).</td></tr>
<tr><th colspan="6">Allowable Actions</th></tr>
<tr><td colspan="3">WAP H&S Funds ☒</td><td colspan="3">Alternative Funds ☒</td></tr>
<tr><td colspan="6">Subrecipients may perform the following:
• Minor repairs and installations to home components, such as repairing stairs or replacing handrails, when necessary to safely weatherize the unit.
• Equipment purchases to protect the health and safety of the WAP Professional such as PPE or jobsite cleaning supplies</td></tr>
<tr><th colspan="6">Prohibited Actions</th></tr>
<tr><td colspan="6">Concur with DOE Guidance ☒</td></tr>
<tr><td colspan="6">Subrecipients are disallowed from using WAP H&S funds for major repairs.</td></tr>
<tr><td colspan="6">Define “major” repairs</td></tr>
<tr><td colspan="6">A repair exceeding $1,200 for one measure is considered a major repair.</td></tr>
<tr><th colspan="6">Allowable Testing/Inspection</th></tr>
<tr><td colspan="3">WAP H&S Funds ☒</td><td colspan="3">Alternative Funds ☒</td></tr>
<tr><td colspan="6">Environmental and surveillance testing required by OSHA regulation.</td></tr>
</table>