

# New York State Weatherization Assistance Program

## Program Year 2020 State Plan - Appendix D

### New York State Homes and Community Renewal

Ruthanne Visnauskas, Commissioner

Andrew Cuomo, Governor

#### NYS Weatherization Assistance Program 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.*

Several sections of the DOE Template refer to WPN 17-06 – which is “Property Acquired Under the Weatherization Assistance Program (WAP) Including Vehicle and Equipment Purchases’ (7/27/2017)”; that reference has been changed below to WPN 17-7 “Weatherization Health & Safety Guidance” (8/9/2017). Also, the template skipped from 7.2c to 7.5. The numbering has been corrected below. H&S measures HCR anticipates addressing with H&S funds is listed but ascribing a cost for each individual measure isn’t feasible given the wide cost differentials throughout the State. Also, the amount and variety of H&S measures that rental property owners throughout the State are typically required to provide, particularly in NYC, makes this request for a ‘true average’ cost by individual H&S measure not practical.

#### 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

#### 3.0 – Health and Safety Expenditure Limits

*Pursuant to 10 CFR 440.16(h), Grantees must set H&S expenditure limits for their Program, providing justification by explaining the basis for setting these limits and providing related historical experience.*

*Low percentages should include a statement of what other funding is being used to support H&S costs, while larger percentages will require greater justification and relevant historical support. It is possible that these limits may vary depending upon conditions found in different geographical areas. These limits must be expressed as a percentage of the ACPU. For example, if the ACPU is \$5,000, then an average expenditure of \$750 per dwelling would equal 15 percent expenditures for H&S.*

*15 percent is not a limit on H&S expenditures but exceeding this amount will require ample justification. These funds are to be expended by the Program in direct weatherization activities. While required as a percentage of the ACPU, if budgeted separately, the H&S costs are not calculated into the per-house limitation. DOE strongly encourages using the table below in developing justification for the requested H&S budget amount. Each H&S measure the Grantee anticipates addressing with H&S funds should be listed along with an associated cost for each measure, and by using historical data the estimated frequency that each measure is installed over the total production for the year.*

*It is also recommend reviewing recent previous budget requests, and compare versus expenditures to see if previous budget estimates have been accurate. The resulting “Total Average H&S Cost per Unit” multiplied by the Grantee’s production estimate in the Annual File should correlate to the H&S budget amount listed in the Grantee’s state plan.*

*Should a Grantee request to have more than 15 percent of Program Operations used for health and safety purposes, DOE will conduct a secondary level of review. DOE strongly encourages use of this H&S template and matrix to help expedite this process.*

Subgrantees are required to budget health and safety costs in a separate budget category that is not included in the cost per unit calculation. Subgrantees will be allowed to budget up to 10% of their total allocation for health and safety, but in higher-cost areas a higher percentage may be allowed to be budgeted on a case-by-case basis, not to exceed 15% of their total allocation. Historically, about 7% of program funding is used for health and safety costs.

In accordance with Federal rules and guidance intended to limit undue or excessive enhancement of the value of multifamily rental units resulting from investment of Program funds, HCR requests most owners of multifamily rental property to contribute to the cost of the weatherization work scope as a condition of receiving assistance. Generally, multifamily building owners provide a minimum of 25% of the total cost of the WAP energy-related work to be done to Program standards.

HCR has initiated an enhanced health and safety effort to promote coordination between Program subgrantees, state and local health departments, and administrators of housing rehabilitation and lead hazard control programs. This initiative, aligned with the national Healthy Homes initiative, is expected to provide additional benefits to assisted households and hopefully, may provide additional funding opportunities for subgrantees.

HCR's Office of Housing Preservation is also increasing coordination of Program resources with the HCR Office of Community Renewal to provide comprehensive weatherization services and additional repair and rehabilitation work through the HOME Program, in areas where HCR administers the HOME Program. Local HOME Program Administrators are encouraged to coordinate with subgrantees when funding rehabilitation of income-eligible buildings. In turn, those subgrantees will be asked to work with local HOME administrators to target properties where an expanded work scope is necessary to avoid deferral of a unit due to health and safety conditions that cannot be addressed with Weatherization funds.

**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")

The incidental repair measure (IRM) category is intended for a measure that is not typically part of the installation of an ECM, or group of ECMs, and / or is outside the manufacturer's or industry standard for installation.

Incidental repairs that are done to enable installation of energy efficiency work will not be billed as health and safety work. Incidental repairs that are not health and safety measures are only allowed when the repair is necessary to install an energy efficiency measure(s).

More extensive conditions, such as serious structural problems or roof replacement, are beyond the scope of the Program and are not considered incidental repair work. WAP work will be deferred on buildings that need more extensive repairs until funding is identified to complete the needed repairs.

Subgrantees are expected to be familiar with housing rehabilitation programs available in their service area to refer owners to programs that can provide assistance that is beyond the scope of weatherization.

**5.0 – Deferral/Referral Policy**

*Deferral of services may be necessary if H&S issues cannot be adequately addressed according to WPN 17-07 guidance. The decision to defer work in a dwelling is difficult but necessary in some cases. This does not mean that assistance will never be available, but that work must be postponed until the problems can be resolved and/or alternative sources of help are found. If, in the judgment of the auditor, any conditions exist which may endanger the health and/or safety of the workers or occupants, the unit should be deferred until the conditions are corrected. Deferral may also be necessary where occupants are uncooperative, abusive, or threatening. Grantees must be specific in their approach and provide the process for clients to be notified in writing of the deferral and what conditions must be met for weatherization to continue. Grantees must also provide a process for the client to appeal the deferral decision to a higher level in the organization.*

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

Yes  No

Where can this deferral/referral policy be accessed?

**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

**7.0 – Health and Safety Categories**

For each of the following H&S categories identified by DOE:

- Explain whether you concur with existing guidance from WPN 17-07 and how that guidance will be implemented in your Program, if you are proposing an alternative action/allowability, or if the identified category will not be addressed and will always result in deferral. Alternatives must be comprehensively explained and meet the intent of DOE guidance.

- Where an Action/Allowability or Testing is “required” or “not allowed” through WPN 17-07, Grantees must concur, or choose to defer all units where the specific category is encountered.

- “Allowable” items under WPN 17-07 leave room for Grantees to determine if the category, or testing, will be addressed and in what circumstances.

- Declare whether DOE funds or alternate funding source(s) will be used to address the particular category.

- Describe the explicit methods to remedy the specific category.

- Describe what testing protocols (if any) will be used.

- Define minimum thresholds that determine minor and major repairs.

- Identify minimum documentation requirements for at-risk occupants.

- Discuss what explicit steps will be taken to educate the client, if any, on the specific category if this is not explained elsewhere in the Plan. Some categories, like mold and moisture, require client education.

- Discuss how training and certification requirements will be provided for the specific category. Some categories, like Lead Based Paint, require training.

- Describe how occupant health and safety concerns and conditions will be solicited and documented.

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

**7.1 – Air Conditioning and Heating Systems****Concurrence, Alternative, or Deferral**

Concurrence with Guidance  Alternative Guidance  Results in Deferral

Air Conditioning Unallowable Measure  Heating Unallowable Measure

**Funding**

DOE  LIHEAP  State  Utility  Other

**How do you address unsafe or non-functioning primary heating/cooling systems?**

In cases where an unsafe heating appliance in a single-family, owner-occupied dwelling is encountered during the heating season, these steps are followed:

- Complete a Health and Safety Notification (Form #15) describing the situation.
- Obtain the owner's signature on the completed Health and Safety Notification.
- Advise the owner to contact the local LIHEAP administrator (HEAP) for emergency heating appliance funding.
- Advise the county HEAP liaison of the situation.
- Transmit a copy of the completed and signed Health and Safety Notification to HEAP and, if the household includes a person over 60, the local office for the aging agency.
- Stop all weatherization work until notification is received that the heating appliance hazard has been corrected.

Applicants in a rental building who request services due to a no-heat or unsafe heating situation are referred to the LDSS or local buildings department for assistance.

When the heating problem has been corrected, the applicant may then be considered eligible for services under WAP.

In all rental buildings, provision of a heating system in good working order **is the responsibility of the building owner**. Income-eligible landlords with an unsafe heating system may be assisted by WAP.

Subgrantees may use weatherization funds to replace unsafe heating systems and domestic hot water tanks that are encountered while providing weatherization services; however, these funds may not be used to provide emergency services except for emergency heating appliance replacement in areas declared federal or state disaster areas, and replacement must always be conducted in compliance with the requirements of the NYS WAP.

Chimneys may be re-lined or repaired when the existing chimney condition creates an unsafe or inefficient condition during the operation of combustion appliances. In situations where an existing chimney is inadequate for the proper venting of combustion appliances, alternative cost-effective methods of venting those appliances are explored and the most cost-effective measure utilized.

**How do you address unsafe or non-functioning secondary heating systems, including unvented secondary space heaters?**

Unvented space heaters are removed as a H&S measure before weatherization measures can be installed, except those used as secondary heat sources that conform to ANSI Z21.11.2.

Subgrantees must explain to owners and tenants, and record on Form #15, that significant amounts of combustion by-products, including water vapor, CO, NO2, and particulates are produced by these systems.

Subgrantees must complete Form #15 and require the applicant to sign the form before proceeding with work. WAP funds cannot be used to purchase or install any type of unvented or vent-less combustion appliance.

**Indicate Documentation Required for At-Risk Occupants**

Form #15 Health and Safety Notification

**Testing Protocols**

All vented combustion appliances are tested for CO in undiluted flue gas and the results documented. Exceptions to this may include wood or coal stoves and any gas-fired appliances that are designed to operate with a positive pressure in the vent pipe (AGA category III or IV gas appliances).

Gas leak detection tests are conducted along accessible gas lines throughout the interior and exterior of the building, and the findings recorded on Indoor Air Quality Test forms (currently Form #12 or Form #14 depending on building type). All accessible gas lines and piping are tested for gas leaks. For significant leaks, combustion appliances are disabled, the area evacuated and ventilated, and the fuel supplier notified for shut-off until repairs are completed. Minor leaks may be addressed at the time of inspection or specified for repair. Testing is performed at audit, after any work on the gas piping is complete, and at post inspection.

An SSE test is required on every heating system, where appropriate, except for wood or coal stoves and those positive pressure systems that are rated as Category III or IV appliances that are not outfitted with SSE testing ports. Pre- and post-weatherization SSE test results are recorded and affixed to the heating appliance on a Heating Appliance Tag (currently Form #39).

The worst-case CAZ configuration for each appliance zone is established and recorded in the client project file. The worst-case negative pressure is measured in all vented CAZs. Any zone or area of the building that contains a vented combustion appliance, including space heaters and water heaters, is considered a CAZ.

BPI combustion safety test procedures are followed, and action levels and appropriate actions taken based on the test results.

Combustion safety testing is done at audit, after any work is done to the building envelope or appliance(s), and at post inspection.

<b>Client Education</b>
Subgrantees educate owners and tenants, using H&S form #15, about the importance of smoke and CO detectors working properly, the importance of heating system monitoring and maintenance for efficiency benefits, the dangers of poorly maintained heating systems, such as high CO levels, and fire hazards associated with using unvented space heaters. New York's <a href="#">How to Live in Your Weatherized Home</a> handout is provided to each assisted household.
<b>Training</b>
Regular mandatory training is required and currently provided for auditors, crew chiefs, crews, and heating technicians; it is renewed every 3 years and includes, but is not limited to, Health & Safety and OSHA 10-hour worksite safety. SF auditors are required to hold BPI certifications in both Heating Professional and Building Analyst titles, training for which is also provided.
<b>7.2 - Asbestos – All</b>
<b>What is the blower door testing policy when suspected Asbestos Containing Material (ACM) is identified?</b>
Blower-door tests are not to be performed in homes where there is a risk of compromised or friable (so soft and weak in structure that it can be broken with simple finger-crushing pressure) asbestos becoming airborne and being drawn into the dwelling. Subgrantees cannot do a blower-door test in a building where compromised or friable asbestos or vermiculite are present. They can utilize the NYS WAP Estimated Blower Door workbook to obtain a blower door number if a complete weatherization work scope can still be done without disturbing the intact asbestos and/or vermiculite. In all cases, if compromised or friable asbestos or vermiculite is to be mitigated or removed, it must be done by a certified abatement specialist and certified remediated before a blower door test can be performed.
<b>7.2a – Asbestos - in siding, walls, ceilings, etc.</b>
<b>Concurrence, Alternative, or Deferral</b>
Concurrence w/ Guidance <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/> Results in Deferral <input type="checkbox"/>
<b>Funding</b>
DOE <input checked="" type="checkbox"/> LIHEAP <input checked="" type="checkbox"/> State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input checked="" type="checkbox"/>
<b>How do you address suspected ACM's in siding, walls, or ceilings that will be disturbed through the course of weatherization work?</b>
Intact asbestos is not a hazard. It becomes a hazard when damaged or deteriorated and friable asbestos particles are being released into the air. First, subgrantees are to determine and document if asbestos is present, friable, and if it presents a potential problem. The subgrantee is advised to proceed cautiously when preparing to weatherize a dwelling unit where the presence of lead, mold, asbestos, vermiculite, or any other potentially toxic substances may be suspected. Subgrantees are required to inform building owners and occupants on the Health and Safety Notification form of the presence of any toxic or potentially toxic materials and/or conditions and to consider the impact on weatherization work scopes to ensure that weatherization will not exacerbate existing conditions resulting in harm to building occupants or to weatherization staff performing the work. Asbestos removal or abatement is only permitted in very limited circumstances. All subgrantees are required to use certified contractors or crew members in compliance with NYS Department of Labor rules when cleaning up, removing, or mitigating asbestos. Generally, suspected asbestos-containing material (ACM) should never be disturbed. Subgrantees are advised to not cut, drill, scrape, sand or brush ACM surfaces. In limited cases, asbestos encapsulation or removal may be allowed with prior approval by HCR. Subgrantees are to refer to DOE WPN 17-07, the NYS WAP Field Guide and the SWS for additional guidance on how to handle the presence of ACM. Where work cannot be performed safely, the subgrantee is required to defer work until hazardous conditions are resolved and to issue Form #15 to owners and occupants.
<b>Testing Protocols</b>
Asbestos testing may be conducted with prior HCR approval when the subgrantee suspects that ACM may be disturbed by installation of weatherization materials. Asbestos testing may only be conducted by a certified abatement specialist. If the presence of asbestos is confirmed, care is taken to not disturb the asbestos (for example, by drilling through asbestos siding). Removal or encapsulation, when approved by HCR, is conducted prior to blower-door testing and can only be conducted by a certified abatement specialist, per the SWS.
<b>Client Education</b>
See H&S Form #15.
<b>Training and Certification Requirements</b>
Component of Auditor and H&S training – “How to identify asbestos and vermiculite”

**7.2b – Asbestos - in vermiculite****Concurrence, Alternative, or Deferral**Concurrence w/ 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?**

Program policy prohibits removing or disturbing vermiculite. Encapsulated vermiculite (for example, vermiculite installed in stud cavities) is not particularly dangerous, if no one opens the wall or engages in demolition. Disturbing vermiculite insulation on an attic floor is always potentially dangerous. Subgrantees are not permitted to blow insulation over the top of vermiculite in open floored attics, or to perform a blower-door test in a building where friable asbestos or vermiculite is present. They utilize the NYS WAP Estimated Blower Door workbook to obtain a blower door number if a complete weatherization work scope can still be done without disturbing the vermiculite. In limited cases, encapsulation or removal may be allowed with prior approval by HCR. Removal or abatement however, is only permitted in very limited circumstances.

**Testing Protocols**

There is no testing protocol employed by NYS WAP for vermiculite. Per the EPA, "Since the Libby mine was estimated to be the source of over 70 percent of all vermiculite sold in the United States from 1919 to 1990 and vermiculite from Libby was contaminated with asbestos, further testing is not necessary to take the appropriate precautions. While you can hire a trained professional to test your attic for asbestos, this may be expensive and, depending on the methods used, might give you erroneous results." A sample taken in one part of an attic may not be representative of vermiculite installed elsewhere in that attic. Even if the sample taken in one part of the attic was determined to be asbestos-free, other bags of Zonolite used to insulate the rest of the attic might have contained extremely dangerous levels of asbestos. NYS WAP does not test vermiculite for asbestos.

**Client Education**

See H&S Form #15. Subgrantees provide clients with the following guidance when vermiculite is present:

(List created by <http://www.greenbuildingadvisor.com>)

- Don't touch or disturb the insulation in your attic.
- Don't use your attic for storage.
- If possible, don't enter your attic.
- Don't allow children to play in the attic.
- Don't open your walls to see if there is vermiculite inside.
- Don't attempt to remove the vermiculite yourself. If you want to have the vermiculite removed, hire a certified asbestos abatement contractor for the job.
- Don't let untrained contractors — for example, electricians or cable installers — into your attic, since contractors may cause a new hazard where none existed.
- Install a warning sign near your attic access hatch reading, "Cancer Hazard: Insulation contains asbestos. Do not disturb or create dust."
- Remember, common dust masks are not effective against asbestos fibers.
- It's probably a good idea to seal any cracks in walls and/or the ceiling that may appear later (for example, cracks around ceiling-mounted electrical boxes) to reduce the chance that vermiculite dust will enter your home. This work should only be performed from below — never from the attic.

**Training and Certification Requirements**

Component of Auditor and H&S training

**7.2c – Asbestos - on pipes, furnaces, other small covered surfaces****Concurrence, Alternative, or Deferral**Concurrence w/ 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?**

See section 7.2a

<b>Testing Protocols</b>
See section 7.2a
<b>Client Education</b>
Form #15; See section 7.2a
<b>Training and Certification Requirements</b>
See section 7.2a
<b>7.3 – Biologicals and Unsanitary Conditions (odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.)</b>
<b>Concurrence, Alternative, or Deferral</b>
Concurrence w/ Guidance <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/> Results in Deferral <input type="checkbox"/>
Unallowable Measure <input type="checkbox"/>
<b>Funding</b>
DOE <input checked="" type="checkbox"/> LIHEAP <input checked="" type="checkbox"/> State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input checked="" type="checkbox"/>
<b>What guidance do you provide Subgrantees for dealing with biological and/or unsanitary conditions in homes slated for weatherization?</b>
When biologicals and unsanitary hazards are identified, applicants are notified on the Health and Safety Notification form. When hazards are present and cannot be mitigated in the course of routine weatherization, the subgrantee must defer work until funding from other sources is available to address the hazard.
<b>Testing Protocols</b>
N/A; Information on biological and unsanitary conditions is obtained through the client questionnaire and by means of the visual inspection.
<b>Client Education</b>
Applicants are advised of these possible hazards on the Health and Safety Notification form, so they can make informed decisions regarding their well-being. Where necessary, applicants are advised to relocate from the unit during installation of energy conservation materials, to ensure the household's safety.
<b>Training</b>
Component of auditor training – "How to identify biologicals and unsanitary conditions"
<b>7.4 – Building Structure and Roofing</b>
<b>Concurrence, Alternative, or Deferral</b>
Concurrence w/ Guidance <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/> Results in Deferral <input type="checkbox"/>
<b>Funding</b>
DOE <input checked="" type="checkbox"/> LIHEAP <input checked="" type="checkbox"/> State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input checked="" type="checkbox"/>
<b>What guidance do you provide Subgrantees for dealing with structural issues (e.g., roofing, wall, foundation) in homes slated for weatherization?</b>
Certain structural repairs may be completed in the course of providing WAP assistance. Repairs provided as part of WAP are incidental and designed to protect or supplement WAP measures or address a H&S issue. If a building or dwelling unit is found to have serious structural problems which make weatherization impractical or impossible, the energy auditor or crew leader reports these findings to his/her supervisor. If corrective action cannot be arranged, the subgrantee consults with the HCR program field representative before proceeding with deferring weatherization due to structural problems.
<b>How do you define "minor" or allowable structure and roofing repairs, and at what point are repairs considered beyond the scope of weatherization?</b>
WAP funds can only be used to make incidental energy related repairs to the structure / roof. These incidental repair measure costs are to be less than or equal to 15% of the estimated total energy conservation measure (ECM) cost to the WAP for the project.

<b>If priority lists are used, and these repairs are designated as Incidental Repairs, at what point is a site-specific audit required?</b>
Priority lists are not used for any 1-4 unit buildings or Manufactured homes in NYS. New York State generally utilizes site-specific audits for multifamily buildings, except under the limited conditions approved in our 2016 energy audit renewal submission. Incidental repairs must still meet approved program criteria for IRMs. However, if the project does not meet the criteria for a priority list building, then it cannot be done as a priority list project and would therefore require a site specific audit.
<b>Client Education</b>
Applicants are advised of any building or structural issues on the Health and Safety Notification form
<b>Training</b>
Component of Auditor training – “How to identify structural issues”
<b>7.5 – Code Compliance</b>
<b>Concurrence, Alternative, or Deferral</b>
Concurrence w/ Guidance <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/> Results in Deferral <input type="checkbox"/>
<b>Funding</b>
DOE <input checked="" type="checkbox"/> LIHEAP <input checked="" type="checkbox"/> State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input checked="" type="checkbox"/>
<b>What guidance do you provide Subgrantees for dealing with code compliance issues in homes receiving weatherization measures?</b>
HCR requires subgrantees to ensure that work is performed in accordance with all state and local codes, and monitors compliance with this requirement during on-site inspections; however, the role of State staff and of subgrantees is oversight. Code compliance is the responsibility of local officials. The visual inspection of the project includes an analysis of potential code violations in areas where work is being done, and subgrantees must obtain building permits for work performed when required by state or local codes prior to commencement of WAP work.
<b>What specific situations commonly trigger code compliance work requirements for your network? How are they addressed?</b>
HCR requires subgrantees to ensure that work is performed in accordance with state and local codes. When, in the judgment of the energy auditor or crew leader, any condition exists, including a code compliance condition, which may endanger the health or safety of the client, work crew or subcontractor, the work should not proceed until the condition is corrected. If conditions cannot be corrected weatherization will be deferred until the condition is corrected.
<b>Client Education</b>
Applicants are advised of the possible code issues on the Health and Safety Notification form.
<b>Training</b>
Component of Auditor training – “How to identify code compliance issues;” HCR allows local & state code training as eligible T&TA cost.
<b>7.6 – Combustion Gases</b>
<b>Concurrence, Alternative, or Deferral</b>
Concurrence w/ Guidance <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/> Results in Deferral <input type="checkbox"/>
<b>Funding</b>
DOE <input checked="" type="checkbox"/> LIHEAP <input checked="" type="checkbox"/> State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input checked="" type="checkbox"/>
<b>Testing Protocols</b>
Gas leak detection tests are conducted along accessible gas lines throughout the interior and exterior of the building, and the findings recorded on the Indoor Air Quality Tests document (Form #12 or Form #14). Minor leaks may be addressed at the time of inspection or specified for repair. Testing is conducted at audit, after any work on the gas piping is complete, and at post inspection.
<b>How are crews instructed to handle problems discovered during testing, and what are the specific protocols for addressing hazards that require an immediate response?</b>
For significant leaks, combustion appliances are disabled, the area is evacuated and ventilated, and the fuel supplier is notified for shut-off until repairs are completed. The subgrantees are advised to contact the local gas company (companies) in their service area(s) to establish criteria for notifying the company regarding gas leaks.

<b>Client Education</b>
Applicants are advised of these possible hazards on the Health and Safety Notification (Form#15)
<b>Training</b>
Component of Auditor H&S training
<b>7.7 – Electrical</b>
<b>Concurrence, Alternative, or Deferral</b>
Concurrence w/ Guidance <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/> Results in Deferral <input type="checkbox"/>
<b>Funding</b>
DOE <input checked="" type="checkbox"/> LIHEAP <input checked="" type="checkbox"/> State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input checked="" type="checkbox"/>
<b>What guidance do you provide Subgrantees for dealing with electrical hazards, including knob &amp; tube wiring, in homes slated for weatherization?</b>
The visual inspection of the unit includes an analysis of electrical hazards. Subgrantees ensure that all electrical hazards that exist in areas where weatherization work is to be done are corrected prior to commencement of work. Subgrantees should avoid insulating any areas of a building where live knob-and-tube wiring is known to exist. Reference T&TA Unit memo dated 5/14/2015 and HCR website for approved variance from SWS. Knob-and-tube wiring can be replaced if the cost of the rewiring and the cost of the insulation added together results in an SIR that is greater than or equal to one. If the hazard exists in areas where weatherization work is to be done, and can't be corrected by WAP prior to commencement of work, H&S notification (Form #15) is issued and the project is deferred until the hazard is remedied.
<b>How do you define “minor” or allowable electrical repairs, and at what point are repairs considered beyond the scope of weatherization?</b>
When the cost of an ECM and the cost of the electrical repair together results in an SIR equal to or greater than one, the electrical repair is allowable. If the electrical repair is not necessary to complete an ECM, or group of ECMs, or doesn't meet the definition of a H&S measure, or the ECM including the electrical repair does not result in an SIR equal to or greater than one, the "minor" repair is not allowable and is considered beyond the scope of WAP.
<b>If priority lists are used, and these repairs are designated as Incidental Repairs, at what point is a site-specific audit required?</b>
Priority lists are not used for any 1-4 unit buildings or Manufactured homes in NYS. New York State generally utilizes site-specific audits for multifamily buildings, except under the limited conditions approved in our 2016 energy audit renewal submission for one type of MF building. Incidental repairs must still meet approved program criteria for IRMs. However, if the project does not meet the criteria for a priority list building, then it cannot be done as a priority list project and would therefore require a site specific audit.
<b>Client Education</b>
Applicants are advised of these possible hazards on the Health and Safety Notification form, so they can make informed decisions regarding their safety.
<b>Training</b>
Component of Auditor training – “How to identify electrical hazards”
<b>7.8 – Formaldehyde, Volatile Organic Compounds (VOCs), Flammable Liquids, and other Air Pollutants</b>
<b>Concurrence, Alternative, or Deferral</b>
Concurrence w/ Guidance <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/> Results in Deferral <input type="checkbox"/>
<b>Funding</b>
DOE <input checked="" type="checkbox"/> LIHEAP <input checked="" type="checkbox"/> State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input checked="" type="checkbox"/>
<b>What guidance do you provide Subgrantees for dealing with formaldehyde, VOCs, flammable liquids, and other air pollutants identified in homes slated for weatherization?</b>
When these substances are suspected in a unit, subgrantees issue a Health and Safety Notification to the homeowner. EPA recommendations on air quality levels are referenced. In cases where hazards exist that are beyond the scope of the program, work will be deferred and subgrantees will notify owners and occupants pursuant to the procedures described in PPM SS 5.07.01: Health and Safety Considerations.

<b>Testing Protocols</b>
Information on hazards are obtained through the client questionnaire and by means of the visual inspection.
<b>Client Education</b>
Applicants are advised of these possible hazards on the Health and Safety Notification (Form #15) in order to make informed decisions regarding their safety.
<b>Training</b>
Component of Auditor training – visual / sensory inspections
<b>7.9 – Fuel Leaks</b> (please indicate specific fuel type if policy differs by type)
<b>Concurrence, Alternative, or Deferral</b>
Concurrence w/ Guidance <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/> Results in Deferral <input type="checkbox"/>
<b>Funding</b>
DOE <input checked="" type="checkbox"/> LIHEAP <input checked="" type="checkbox"/> State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input checked="" type="checkbox"/>
<b>Remediation Protocols</b>
If fuel leak in line is minor and can be rectified by tightening of fitting, then it is an eligible H&S repair. Otherwise, H&S notification and BPI safety protocols are followed: <input type="checkbox"/> Inform homeowner/occupants of unsafe conditions <input type="checkbox"/> Advise evacuation <input type="checkbox"/> Auditor and all workers must leave building <input type="checkbox"/> Emergency service provider notified
<b>How do you define allowable fuel leak repairs, and at what point are repairs considered beyond the scope of weatherization?</b>
Oil tank, piping and equipment are visually inspected for leaks (see above). If fuel leak in line is minor and can be rectified by tightening of fitting, then it is an eligible H&S repair. If the fuel leak is in large multi-family fuel piping, or is in an oil tank, the leak will be reported in accordance with local codes and jurisdictions, the owner will be notified, and the project will be deferred. BPI protocols will be followed. For gas leaks see section 7.6 of the H&S Plan, Combustion Gases.
<b>Client Education</b>
Applicants and/or owners are advised of leak/spill on the Health and Safety Notification form
<b>Training</b>
Component of Auditor training – visual inspections
<b>7.10 – Gas Ovens / Stovetops / Ranges</b>
<b>Concurrence, Alternative, or Deferral</b>
Concurrence w/ Guidance <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/> Results in Deferral <input type="checkbox"/>
<b>Funding</b>
DOE <input checked="" type="checkbox"/> LIHEAP <input checked="" type="checkbox"/> State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input checked="" type="checkbox"/>

**What guidance do you provide Subgrantees for addressing unsafe gas ovens/stoves/ranges in homes slated for weatherization?**

Topic is covered in Field Guide and PPM with additional specifics provided to follow BPI Combustion Safety procedures. Subgrantees are to test the oven for combustion safety following these steps and recommended actions. They are to measure CO in the ambient air in the kitchen during these tests. The EPA recommends that the ambient air should never be more than 35 parts per million (ppm) during the test. The basic procedure is:

1. Test for gas leaks in the gas piping in and around the range and oven.
2. Turn the oven on and set it to bake on high temperature. Sample the CO level in exhaust gases at the oven vent and in the ambient air nearby after 10 minutes.
3. If the vent CO reading is over 225 ppm as measured, or if the ambient-air reading exceeds 35 ppm as measured during the test, discontinue testing. In the case where both spillage and excessive CO are present, ventilate the area and recommend that the appliance be shut down immediately until it can be serviced.
4. Clean and tune the oven by removing aluminum foil, dirt, and corrosion around the burner. Many range and oven burners are equipped with adjustable needle-and seat valves. Adjust the burner's gas control to reduce CO.
5. If the vent CO reading remains over 225 ppm as measured, consider replacing the oven and range if **non-DOE funds are available**; if not, advise the homeowner/occupant that the appliance should be shut down and serviced immediately by a qualified professional.

**Testing Protocols**

BPI Combustion Safety Test Procedures and Action Levels can be found on BPI's Web site:  
[http://www.bpi.org/Web%20Download/BPI%20Standards/Building%20Analyst%20Professional\\_2-28-05nNC-newCO.pdf](http://www.bpi.org/Web%20Download/BPI%20Standards/Building%20Analyst%20Professional_2-28-05nNC-newCO.pdf).

**Client Education**

How to Live in Your Weatherized Home handout; it is recommended the following topics are discussed:

- Never use a range burner or gas oven as a space heater.
- Open a window, and/or turn on the kitchen exhaust fan when using the range or oven.
- Never install aluminum foil around a gas range burner or gas oven burner because the foil could interfere with the flame.
- Keep range burners and ovens clean to prevent dirt from interfering with combustion.
- Gas burners should display hard blue flames. Call a service company if you notice yellow flames, white flames, wavering flames, or noisy flames.

**Training**

Component of Auditor training – IAQ testing

**7.11 – Hazardous Materials Disposal [Lead, Refrigerant, Asbestos, Mercury (including CFLs/fluorescents), etc.] (please indicate material where policy differs by material)**

**Concurrence, Alternative, or Deferral**

Concurrence w/ Guidance  Alternative Guidance  Results in Deferral

**Funding**

DOE  LIHEAP  State  Utility  Other

**Client Education**

Clients are advised of any possible hazards on the Health and Safety Notification (Form #15) in order to make informed decisions regarding their safety.

**Training**

OSHA 10-hour worksite training is a mandatory training per program policy. All technicians performing diagnostic tests or inspections, must have access to all necessary personal protective equipment required by OSHA. (Personal safety standards are from BPI's technical standards. See [www.bpi.org](http://www.bpi.org).) Required protective equipment includes, but is not limited to, fitted respirators with canister filters, dust masks, gloves, protective clothing, safety glasses, and hard hats. Technicians are trained in proper use and applications for these devices and must adhere to OSHA regulations when on the job site. A copy of the Material Safety Data Sheets (MSDS or SDS) for all materials used on the job and installed in the unit is kept on each crew vehicle and made available to all workers and assisted households upon request.

<b>Disposal Procedures and Documentation Requirements</b>
All refrigerators containing hazardous material, or any other possibly hazardous materials encountered (CFLs/Fluorescents, etc.) that are removed or replaced are de-manufactured or disposed of in accordance with local laws, regulations and/or NYS DOL and EPA requirements, as applicable. See PPM SS 5.07.01: Health and Safety Considerations; SS 5.13: Refrigerator Replacement Criteria. Proper disposal requirements are documented in contract language with responsible parties (subcontractors).
<b>7.12 – Injury Prevention of Occupants and Weatherization Workers</b>
<b>Concurrence, Alternative, or Deferral</b>
Concurrence w/ Guidance <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/> Results in Deferral <input type="checkbox"/>
<b>Funding</b>
DOE <input checked="" type="checkbox"/> LIHEAP <input checked="" type="checkbox"/> State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input checked="" type="checkbox"/>
<b>What guidance do you provide Subgrantees regarding allowable injury-related repairs (e.g., stairs, handrails, porch deck board)?</b>
Mandatory training is provided to weatherization crews to avoid falls and other on-the-job injuries. Subgrantees take all reasonable precautions to reduce the risk of injury to workers or occupants of assisted buildings. In limited cases, minor repairs may be conducted to avoid injury risk. In cases where serious safety conditions exist, work will be deferred and subgrantees will notify owners and occupants pursuant to the procedures described in Section V.7.6, of the State Plan. See PPM SS 5.01: Building Analysis, SS 5.07.02 and SS 6.01.
<b>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.</b>
Minor repairs are defined as reasonable, low-cost <i>precautions</i> deemed necessary to reduce the risk of injury to workers or occupants of assisted buildings that do not fall into the category of serious structural problems, or are repairs necessary to protect or supplement WAP energy conservation measures over the course of their life, which would otherwise make weatherization impractical or impossible and would lead to deferral. As stated in the NYS PPM, the incidental repair measure (IRM) category is intended for a measure that is not typically part of the installation of an ECM, and / or is outside the manufacturer's or industry standard for installation, but is necessary to rectify an issue(s), thereby making possible the installation of an ECM, or group of ECMs. A low cost H&S measure repair is for rectifying an existing H&S issue to maintain the physical well being of both the occupants and / or WAP workers. H&S funds have their own designated budget category, typically limited to 10% of a subgrantee's total allocation and IRM costs are not to exceed 15% of the total estimated ECM workscope cost to the WAP for the project.
<b>Training</b>
Component of Auditor training - Injury Prevention / Minor repairs
<b>7.13 – Lead Based Paint</b>
<b>Concurrence, Alternative, or Deferral</b>
Concurrence w/ Guidance <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/> Results in Deferral <input type="checkbox"/>
<b>Funding</b>
DOE <input checked="" type="checkbox"/> LIHEAP <input checked="" type="checkbox"/> State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input checked="" type="checkbox"/>
<b>Safe Work Protocols</b>
All work performed on homes built before 1978 is completed using LSW practices, pursuant to the EPA RRP and DOE's WPN 17-7 and SWS. The subgrantees are required to document lead-safe work in the job file. Field representatives verify LSW practices are being followed via in progress site visits and QA procedures.
<b>Testing Protocols</b>
Lead clearance tests, where required by HCR policy, are performed and the results of the tests maintained by the subgrantee for inspection by HCR.
<b>Client Education</b>
Owners and / or occupants of any dwelling built before 1978 that is to receive weatherization assistance will receive the pamphlet, “Renovate Right: Important Lead Hazard Information for Families, Child Care Providers, and Schools.”

<b>Training and Certification Requirements</b>
<input type="checkbox"/> HCR requires that subgrantees and their subcontractors have at least one staff person attend a one-day EPA-approved lead renovators' certification course. HCR typically provides for this training and encourages subgrantees to have <u>all</u> WAP staff become certified lead renovators. <input type="checkbox"/> HCR requires that all subgrantee and subcontractor personnel who will come in contact with lead paint attend a one-day LSW Practices training session.
<b>Documentation Requirements</b>
Lead Clearance Testing, Signature page of the "Renovate Right: Important Lead Hazard Information for Families, Child Care Providers, and Schools," documentation of LSW practices in project file.
<b>7.14 – Mold and Moisture</b> (Including but not limited to: drainage, gutters, down spouts, extensions, flashing, sump pumps, landscape, vapor retarders, moisture barriers, etc.)
<b>Concurrence, Alternative, or Deferral</b>
Concurrence w/ Guidance <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/> Results in Deferral <input type="checkbox"/>
<b>Funding</b>
DOE <input checked="" type="checkbox"/> LIHEAP <input checked="" type="checkbox"/> State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input checked="" type="checkbox"/>
<b>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?</b>
Subgrantees inspect the building for signs of mold and moisture damage, locate and eliminate or reduce sources of excessive moisture wherever possible. Limited (incidental) water damage can be addressed. Correction of moisture and mold-creating conditions is allowed only when necessary to weatherize the home and ensure the long-term stability and durability of measures. Ventilation is installed if necessary; dehumidifiers are not provided. Where severe mold and moisture issues exist, typically these are the responsibility of the owner and cannot be addressed; deferral of WAP is recommended. Reference NYS WAP PPM, variances posted to NYS WAP web page and the NYS WAP Field Guide w/ links to SWS.
<b>How do you define "minor" or allowable moisture-related measures, and at what point is work considered beyond the scope of weatherization?</b>
Allowable moisture related measures are listed in the Field Guide under 'Inexpensive Moisture Solutions'; 'More Costly Solutions' are listed as well but it is made clear these potential solutions are to be considered only on a case-by-case basis and require approval by an HCR program representative prior to proceeding. Typically, such repairs are the responsibility of the building owner. Such solutions would be evaluated in the same manner as incidental repairs – not exceeding 15% of estimated ECM project costs to the WAP.
<b>Client Education</b>
If mold or moisture conditions exist within the building, Form #15 is completed by the subgrantee and signed by the applicant. Sources of the problem, and any solutions, are to be discussed.
<b>Training</b>
Component of Auditor training – Mold / Moisture
<b>7.15 – Pests</b>
<b>Concurrence, Alternative, or Deferral</b>
Concurrence w/ Guidance <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/> Results in Deferral <input type="checkbox"/>
<b>Funding</b>
DOE <input checked="" type="checkbox"/> LIHEAP <input checked="" type="checkbox"/> State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input checked="" type="checkbox"/>
<b>What guidance do you provide Subgrantees for dealing with pests and pest intrusion prevention in homes slated for weatherization?</b>
Air sealing and installation of screens or barriers to prevent pest infestation is permitted when feasible and cost-effective. Pest removal is generally the responsibility of the owner. If a building is infested with rats, roaches, or other vermin, the subgrantee should refuse to weatherize until the condition is corrected. If conditions cannot be corrected weatherization may be denied. Guidance provided in the NYS WAP Field Guide includes, but is not limited to, termination fittings for intake and exhaust ducts must exclude pests and water.

<b>Define Pest Infestation Thresholds, Beyond Which Weatherization Is Deferred</b>
Infestation is the threshold; if the infestation condition cannot be remediated, deferral is recommended until such time as condition is remedied.
<b>Testing Protocols</b>
No testing protocol for infestation; visual / sensory inspection at time of audit.
<b>Client Education</b>
If an infestation condition exists within the building, Form #15 is completed by the subgrantee, signed by the client and deferral is explained.
<b>Training</b>
Component of Auditor training – Pests / Infestation
<b>7.16 – Radon</b>
<b>Concurrence, Alternative, or Deferral</b>
Concurrence w/ Guidance <input checked="" type="checkbox"/> Alternative Guidance <input checked="" type="checkbox"/> Results in Deferral <input type="checkbox"/>
<b>Funding</b>
DOE <input checked="" type="checkbox"/> LIHEAP <input checked="" type="checkbox"/> State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input checked="" type="checkbox"/>
<b>What guidance do you provide Subgrantees around radon?</b>
Buildings in areas where high radon levels are believed to exist may be tested, with HCR pre-approval, and mitigation measures followed to ensure that radon hazards are not made worse. Whenever the EPA has identified a location as having a high potential for radon (Zones 1 & 2), precautionary WAP efforts can be undertaken but are limited. As site conditions allow, exposed dirt could be covered with a vapor barrier, carefully sealing seams and edges. Sealing obvious penetrations in walls and floors of basements or crawl spaces is also allowed. Open sump pits may be capped, however drainage must be maintained, and crawl space venting inspected and/or improved. Separating the basement from the living space as part of air sealing efforts is another mitigation approach subgrantees may take to address radon. Regardless, in homes where radon has been identified as having a high potential to exist (Zones 1 & 2), precautions should be taken to reduce the possibility of making radon issues worse. However, in projects where elevated radon levels are known to exist, remediation is beyond the scope of the program and work must be deferred; subgrantees will notify owners and occupants pursuant to the procedures described in Section V.7.6, of the NYS Plan.
<b>Testing Protocols</b>
Buildings in areas where high radon levels are believed to exist (Zones 1 or 2) may be tested, but only with HCR pre-approval.
<b>Client Education</b>
Assisted households will be provided with EPA information on radon hazards.
<b>Training and Certification Requirements</b>
Radon is to be included in program's mandatory Health & Safety training.
<b>Documentation Requirements</b>
EPA Radon information will be provided to all households. Owners will be required to sign an informed consent form that they have been supplied EPA Radon information, are aware there is a small risk of increased radon levels when building tightness is improved, and are providing their consent to proceed with weatherization. Subgrantees will be required to maintain the signed consent forms in the project file.
<b>7.17 – Safety Devices: Smoke and Carbon Monoxide Alarms, Fire Extinguishers</b>
<b>Concurrence, Alternative, or Deferral</b>
Concurrence w/ Guidance <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/> Results in Deferral <input type="checkbox"/>
<b>Funding</b>
DOE <input checked="" type="checkbox"/> LIHEAP <input checked="" type="checkbox"/> State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input checked="" type="checkbox"/>

**What is your policy for installation or replacement of the following:**

Smoke Alarms:  
Smoke detectors must be present and operational in all weatherized units. Subgrantees may not replace operable smoke detectors with WAP funds.

Carbon Monoxide Alarms:  
CO detectors are installed in any dwelling unit that does not have a working CO detector. Refer to manufacturer for proper installation and educate the household about CO. Subgrantees may not replace operable CO detectors with WAP funds.

Fire Extinguishers:  
Fire extinguishers are not provided, but owners and occupants are made aware of attendant hazards and that one is advisable in units with solid fuel burning appliances.

**Testing Protocols**

All alarms will be tested during the audit

**Client Education**

Subgrantees will refer to manufacturer specifications for proper installation and educate the household about CO and smoke alarms.

**Training**

Component of Auditor training; mandatory H&S training

**7.18 – Occupant Health and Safety Concerns and Conditions**

**Concurrence, Alternative, or Deferral**

Concurrence w/ Guidance  Alternative Guidance  Results in Deferral

**Funding**

DOE  LIHEAP  State  Utility  Other

**What guidance do you provide Subgrantees for soliciting the occupants’ health and safety concerns related to components of their homes?**

Subgrantees are required to take all reasonable precautions against performing work on buildings that will subject workers or clients to health and safety risks. Subgrantees are required to consider the health concerns of each occupant prior to initiating work on a residence. Form #11 or #11a - Client Questionnaire - is completed before any work is begun, to help assist in identifying existing building or household occupant health and safety problems / concerns. The subgrantee representative is required to meet with a building owner, representative or member of the household to discuss and complete the Client Questionnaire.

**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?**

When performing an energy audit, the energy auditor should be referencing the information on the Client Questionnaire. This questionnaire provides the auditor with information about the building and the lifestyle of its occupants to help the auditor identify, among other things, any potential health and safety concerns. Once identified, these areas can be dealt with through client education or adjustments to the work scope.

**What guidance do you provide Subgrantees for dealing with potential health concerns when they are identified?**

HCR requires subgrantees to notify owners and occupants of any adverse health or safety conditions discovered in a building where weatherization work will be conducted, or where a decision to defer work has been made. Subgrantees are required to complete the HCR Health and Safety Notification (Form #15) with client sign off to inform and educate occupants and owners of potential health or safety hazards present in the building.  
Subgrantees are required to take all reasonable precautions against performing work on buildings that will subject workers or clients to health and safety risks. HCR has also developed procedures to protect occupants while work is being installed. A daily safety check is required at the end of each work day, and any safety issues addressed, to ensure that no conditions exist that would compromise worker’s or building occupants’ health and safety as a result of the weatherization work that was performed that day. All work and testing is clearly documented in the client file on the appropriate forms.

<b>Client Education</b>
The auditor is also required to complete a visual health and safety inspection and provide documentation of any concerns discovered. Where serious concerns are found, that can or cannot be addressed through weatherization, occupants are advised of these possible hazards in writing (Health and Safety Notification; Form #15) by the subgrantee in order that they may make informed decisions regarding their safety. Where necessary, occupants will be advised to relocate from the building or unit during installation of energy conservation materials to ensure the household's safety.
Documentation Form(s) have been developed and comply with guidance?      Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
<b>7.19 – Ventilation and Indoor Air Quality</b>
<b>Concurrence, Alternative, or Deferral</b>
Concurrence w/ Guidance <input checked="" type="checkbox"/> Alternative Guidance <input checked="" type="checkbox"/> Results in Deferral <input type="checkbox"/>
<b>Funding</b>
DOE <input checked="" type="checkbox"/> LIHEAP <input checked="" type="checkbox"/> State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input checked="" type="checkbox"/>
<b>Identify the Most Recent Version of ASHRAE 62.2 Implemented (optional: identify Addenda used)</b>
NYS WAP currently is following the ASHRAE 62.2-2016 standard, with approved variances related to multifamily buildings.
<b>Testing and Final Verification Protocols</b>
See DOE approved variance and pilot program 2018 – 2019 for Multifamily buildings.
<b>Client Education</b>
Subgrantee is to provide the client information on purpose, use and function of any installed ventilation component, along with any manuals and warranty information. Form #15 is issued to any building owner when roof exhaust fans are not operational or are in need of maintenance.
<b>Training</b>
Component of ongoing Auditor training & standalone ASHRAE 62.2 presentations
<b>7.20 – Window and Door Replacement, Window Guards</b>
<b>Concurrence, Alternative, or Deferral</b>
Concurrence w/ Guidance <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/> Results in Deferral <input type="checkbox"/>
<b>Funding</b>
DOE <input checked="" type="checkbox"/> LIHEAP <input checked="" type="checkbox"/> State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input checked="" type="checkbox"/>
<b>What guidance do you provide to Subgrantees regarding window and door replacement and window guards?</b>
Windows and doors will not be replaced as health and safety measures. Installation of window guards (which is often required by code on buildings in New York City) will be provided by rental property owners, when required.
<b>Testing Protocols</b>
N/A
<b>Client Education</b>
When applicable, owners and applicants are advised of possible hazards on the Health and Safety Notification (Form #15). Workslope components are reviewed prior to implementation and summarized at post w/ client.
<b>Training</b>
Component of Auditor training
<b>7.21 – Worker Safety (OSHA, etc.)</b>
<b>Concurrence, Alternative, or Deferral</b>
Concurrence w/ Guidance <input checked="" type="checkbox"/> Alternative Guidance <input type="checkbox"/> Results in Deferral <input type="checkbox"/>
<b>Funding</b>
DOE <input checked="" type="checkbox"/> LIHEAP <input checked="" type="checkbox"/> State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input checked="" type="checkbox"/>

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

Specific training related to worker safety is repeated every 3 years by subgrantee personnel. Compliance with this program requirement is monitored by field staff in their field visit reports. Any agencies that are not in compliance will be referred to the WAP T&TA unit for mandatory or additional training. HCR utilizes field staff as part of a quality assurance strategy. Field staff visit subgrantee worksites on a regular basis to monitor the progress of subgrantees on work required as part of their program contract. During these monitoring visits, when staff observes areas where subgrantees are lacking or need assistance, including worker safety, the individual staff member will provide the assistance needed or will arrange for additional training.

**Training and Certification Requirements**

- 1-day Basic Health & Safety
- 1-day Lead-safe Weatherization Practices
- 1-day EPA Lead Renovator Certification
- OSHA 10-hour Training / Confined Spaces
- Other targeted training as needed