

2020 Nebraska 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.

The average per dwelling expenditure of financial assistance provided under WAP for labor, weatherization materials, and related matters may not exceed \$7,669 statewide in Program Year 2020 (starting July 1, 2020), as per the U.S. Department of Energy's Weatherization Program Notice 20-1. Historically, Nebraska has not limited H&S investment to a per-unit cost, but it has allocated between 15-20 percent of its annual allocations to cover H&S-related expenditures. In PY2020, a per dwelling unit limit for Health and Safety expenditures of \$1,500 has been established, based on historical data. Units may exceed the \$1,500 limit if approved in advance by the Nebraska Energy Office (NEO) on a case-by-case basis.

Please see the USDOE approved Nebraska Weatherization Field Guide and Installation Standards, Section 2 for Nebraska's WAP Health and Safety plan for Single Family Homes and Manufactured Homes. (Links to be posted on the Energy Office Weatherization website. <http://www.neo.ne.gov/wx/news/wxassist.htm>)

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 budget requests, versus expenditures to see if previous budget estimates have been accurate. The resulting "Total Average H&S Cost per Unit" multiplied by the Grantee's production estimate in the Annual File should correlate to the H&S budget amount listed in the Grantee's state plan.

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

(odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.)

- 7.6 – Building Structure and Roofing - \$300.00
- 7.9 – Electrical - \$300.00
- 7.14 – Injury Prevention of Occupants and Weatherization Workers \$200.00
(Measures such as repairing stairs and replacing handrails)
- 7.16 – Mold and Moisture \$300.00
(Including but not limited to: drainage, gutters, down spouts, extensions, flashing, sump pumps, dehumidifiers, landscape, vapor retarders, moisture barriers, etc.)
- 7.17 – Pests - \$300.00

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?

Chapter 2 - Health & Safety of the Nebraska Installation Standards for Single Family and Manufactured Housing, approved by USDOE on May 23, 2018, specifies that if a sub-grantee makes a determination that there are circumstances that prevent the weatherization process from proceeding in a home, they are required to:

- Provide information to the client, in writing, describing conditions that must be met in order for weatherization to commence. A copy of this notification must also be placed in the client file and, if possible, refer the client to other service organizations that may be able to assist in solving the problem.
- Provide the client with a completed copy of the Nebraska WAP Weatherization Deferral Notice (Form WX4).
- Clearly indicate in the client file why the dwelling was given “deferral” status.
- Have available a system for a timely and fair administrative hearing of complaints received from clients denied services. An unreasonable delay in acting on an application for assistance will constitute grounds for a hearing.

Additionally, at the time of application, the applicant is given a written notice outlining their rights and the method to file a complaint. All sub-grantees are required to adhere to their agency’s grievance policies. If the grievance cannot be resolved through the subgrantees process, the applicant may file a complaint with the Nebraska Energy Office.

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

The Nebraska Weatherization Assistance Program was developed and utilizes Health & Safety Forms to document, clarify and notify clients of potential numerous types of Health and Safety issues.

Initial information that may give sub-grantees insight to potential Health & Safety issues is provided by the client to the weatherization intake worker and documented on the following forms:

Form WX13 Weatherization Client Questionnaire

<http://www.neo.ne.gov/wx/news/forms/ClientQuestionnaire13.pdf>

Form WX7 Home Health and Safety Screening Questionnaire

<http://www.neo.ne.gov/wx/news/forms/HealthScreening7.pdf>

The following issue specific forms are completed as part of the initial Health and Safety inspection of the home:

Form WX3 Lead Hazard Pre-Renovation Form

<http://www.neo.ne.gov/wx/news/forms/LeadHazard3.pdf> along with providing the client the EPA's Lead; Renovation, Repair and Painting Program (RPP) documentation

Form WX5 Mold Assessment and Release Form

<http://www.neo.ne.gov/wx/news/forms/Mold5.pdf>

The following Forms are completed by sub-grantees with clients to ensure that they understand the information that has been provided to them, ensuring that they have been informed of their rights and options:

Form WX6 Radon Informed Consent/Consent to Perform Work Form

<http://www.neo.ne.gov/wx/news/forms/Radon6.pdf>

Form WX2 Client Education Confirmation of Receipt

<http://www.neo.ne.gov/wx/news/forms/ClientConfirm2.pdf>

The following education pieces are also provided to and discussed with each weatherization client:

Asbestos Fact Sheet

<http://www.neo.ne.gov/wx/news/forms/asbestosfacts.pdf>

EPA's A Citizen's Guide to Radon

Combustion Equipment Safety Fact Sheet

<http://www.neo.ne.gov/wx/news/forms/combustionsafety.pdf>

The following Form is used by sub-grantees (and required in each client file) verifying that each client has received all appropriate Health & Safety documentation:

Form WX8 Health and Safety Checklist

<http://www.neo.ne.gov/wx/news/forms/HealthSafety8.pdf>

When the deferral of a home is required based on Health and Safety concerns the sub-grantee provides the following Form to the client notifying of the issues and what must be remedied to allow weatherization of the home to begin:

Form WX4 Weatherization Deferral Notice

<http://www.neo.ne.gov/wx/news/forms/DeferralNotice4.pdf>

If the sub-grantee makes a determination that there are circumstances that prevent the weatherization process from proceeding, they are required to:

- Provide information to the client, in writing, describing conditions that must be met in order for weatherization to commence. A copy of this notification must also be placed in the client file and, if possible, refer the client to other service organizations that may be able to assist in solving the problem.
- Provide the client with a completed copy of the Nebraska WAP Weatherization Deferral Notice (Form WX4).
- Clearly indicate in the client file why the dwelling was given "deferral" status.

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?

- “Red tagged”, inoperable or non-existent *heating system* replacement, repair, or installation *is* an allowable Health & Safety Cost.
- Repair of air conditioning systems *is* an allowable Health & Safety Cost. Replacement or installation of air conditioning systems *is not* an allowable Health & Safety Cost.
 - A maximum \$500 may be spent to repair heat pumps and central air conditioning systems.
 - In renter occupied homes, if the cost to repair the central air conditioner or heat pump exceeds \$500, the owner may repair or replace the unit. However, if the central air conditioner or heat pump is replaced in accordance with the requirements of this Field Guide and Installation Standards, the *Nebraska Weatherization Assistance Program (NeWAP)* may contribute a maximum of \$500 to the replacement cost.
- Unsafe primary units must be repaired, replaced and removed, or rendered inoperable, or deferral is required.

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

- Replacement or installation of secondary units is not allowed.
- Secondary unvented units that conform to the safety standards on ANSI Z21.11.2 may remain as back-up heat sources.
- Units that do not meet ANSI Z21.11.2 **must** be removed, and properly disposed of, prior to weatherization but may remain until a replacement *heating system* is in place.
- Secondary unvented units that conform to the safety standards on ANSI Z21.11.2, but are not operating safely, must be removed and properly disposed of.
- Repair of secondary unvented units is not allowed.
- An unvented gas-liquid-fueled space heater that remains in a completed single-family house after weatherization shall:
 - Not have an input rating in excess of 40,000 Btu/hour;
 - Not be located in, or obtain combustion air from sleeping rooms, bathrooms, toilet rooms, or storage closets, except:
 - One listed wall-mounted space heater in a bathroom if permitted by the authority having jurisdiction which:
 - has an input rating that does not exceed 6,000 Btu/hour;
 - Is equipped with an oxygen-depletion sensing safety shut-off system; and
 - The bathroom has adequate combustion air;
 - One listed wall-mounted space heater in a bedroom if permitted by the authority having jurisdiction which:
 - has an input rating that does not exceed 10,000 Btu/hour;
 - Is equipped with an oxygen-depletion sensing safety shut-off system; and
 - The bathroom has adequate combustion air.

Indicate Documentation Required for At-Risk Occupants

- The State of Nebraska’s annual heating degree day normal, over the forty seven year period from 1970-2018 is 6322, with January average °F high and low temperatures of 35 to 12. Clients in units that contain *heating plants* that are inoperable or red-tagged are in danger of frost bite, hypothermia and other life threatening issues. Therefore, units that contain heating plants that are inoperable or red-tagged at the time of the initial inspection must have the heating plant addressed.
- The replacement or installation of air conditioning is not a Health & Safety measure, therefore no at risk definition is applicable.

Testing Protocols

- Verify that systems are present, operable, and performing correctly.
- Run DOE-approved energy audit to determine if the system can be installed as an energy conservation measure (ECM) prior to replacement as an H&S measure.
- For combustion equipment; inspect chimney and flue and test for Combustion Appliance Zone (CAZ) depressurization.
- For solid fuel appliances; look for visual evidence of soot on the walls, mantel or ceiling or creosote staining near the flue pipe.

Client Education

<ul style="list-style-type: none"> • When deferral is necessary, provide information to the client, in writing, describing conditions that must be met in order for weatherization to commence. A copy of this notification must also be placed in the client file. • Discuss appropriate use and maintenance of units. • Provide all paperwork and manuals for any installed equipment. • Where combustion equipment is present, provide safety information regarding how to recognize depressurization. • When bulk fuel tanks when not removed as part of the weatherization work, discuss and provide information on proper disposal.
Training
<ul style="list-style-type: none"> • WAP H&S policy training on allowable activities. • Licensing and/or certification for HVAC installers as required by authority having jurisdiction (AHJ). • CAZ depressurization test and inspection training.

7.2 - Asbestos - All

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

In Siding, walls, ceilings, etc.

- In homes where **friable** suspected ACM siding, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present, blower door testing, using positive pressure techniques, must be completed.
- In homes with asbestos siding, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present and **in good condition**, blower door testing, using either negative or positive pressure techniques, must be completed.

In vermiculite

- If the presence of asbestos has been previously confirmed or if the sub-grantee believes that vermiculite insulation is present, when blower door tests are performed, it must be performed using pressurization instead of depressurization.

On pipes, furnaces, or other small covered surfaces

- In homes where **friable** suspected ACM, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present, blower door testing must not be completed.
- In homes with asbestos, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present, encapsulated and **in good condition**, blower door testing, using either negative or positive pressure techniques, must be completed.

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

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

How do you address suspected ACM's in siding, walls, or ceilings that will be disturbed through the course of weatherization work?

<ul style="list-style-type: none"> • In homes where <i>friable</i> suspected ACM siding, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present: <ul style="list-style-type: none"> ○ The sub-grantee must take precautionary measures as if it contains asbestos, such as utilizing personal air monitoring. ○ Blower door testing, using positive pressure techniques, must be completed. ○ Wall insulation measure work must be completed from the interior of the home. ○ The costs associated with asbestos testing, abatement or replacement with new siding are not eligible expenditures in the <i>Nebraska Weatherization Assistance Program</i>. • In homes with asbestos siding, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present and in good condition: <ul style="list-style-type: none"> ○ Installing dense-pack insulation from the exterior is allowed. ○ Blower door testing, using either negative or positive pressure techniques, must be completed. • Removal of siding is allowed to perform energy conservation measures; however precautions must be taken not to damage the siding. Asbestos siding should never be cut, sanded or drilled. Where possible, insulate the exterior walls through the interior of the home. Documentation regarding the presence of disturbed asbestos material by an appropriately trained crew leader, auditor or inspector or testing must be maintained in the client file. • Any testing results used to support the installation of ECM associated with the exterior walls of the homes must include appropriate documentation indicating the sample collection and testing was conducted by an Asbestos Hazard Emergency Response Act of 1986 (AHERA) certified tester. A copy of the test results must be included in the client file. • The costs associated with asbestos testing are not eligible expenditures in the <i>Nebraska Weatherization Assistance Program</i>.
Testing Protocols
<ul style="list-style-type: none"> • Visually inspect exterior wall surface and subsurface, floors, walls, and ceilings for suspected ACM prior to drilling or cutting.
Client Education
<ul style="list-style-type: none"> • Inform the client in writing that suspected ACMs are present and what precautions will be taken to ensure the occupants' and workers' safety during weatherization. • Instruct client in writing not to disturb suspected ACM. • Provide asbestos safety information to the client. • When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.
Training and Certification Requirements
<ul style="list-style-type: none"> • Safe practices for siding removal and replacement. • How to identify suspected ACM. • Licensing/certification for removal and reinstallation of asbestos siding if required by AHJ. The costs associated with asbestos abatement, encapsulation or replacement with new siding are not eligible expenditures in the <i>Nebraska Weatherization Assistance Program</i>. • Cost incurred by sub-grantees to comply with asbestos inspection training requirements may be charged to the Health & Safety budget category.

7.2b – Asbestos - in vermiculite		
Concurrence, Alternative, or Deferral		
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>
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?

- If the presence of asbestos has been previously confirmed or if the sub-grantee believes that vermiculite insulation is present:
 - The sub-grantee **must** take precautionary measures as if it contains asbestos, such as utilizing personal air monitoring while in attics.
 - When blower door tests are performed, it **must** be performed using pressurization instead of depressurization.
 - Documentation regarding the presence of asbestos material by an appropriately trained crew leader, auditor or inspector or testing **must** be maintained in the client file.
 - The costs associated with vermiculite/asbestos testing is an eligible expenditures in the *Nebraska Weatherization Assistance Program*. Subgrantees are limited to a maximum cost of \$150 for vermiculite testing.
 - The costs associated with vermiculite abatement or encapsulation are **not** eligible expenditures in the *Nebraska Weatherization Assistance Program*.
- Documentation regarding the presence of asbestos material by an appropriately trained crew leader, auditor or inspector or testing **must** be maintained in the client file.
- When deferral is necessary due to asbestos, the home owner/occupant must provide remediation documentation indicating the remediation was completed by an Asbestos Hazard Emergency Response Act of 1986 (AHERA) certified professional, prior to the implementation of the attic insulation ECMs. A copy of the documentation must be included in the client file.

Testing Protocols

- AHERA sample collection and testing must be conducted by a certified tester and is an eligible expenditures in the *Nebraska Weatherization Assistance Program*. Subgrantees are limited to a maximum cost of \$150 for vermiculite testing.
- Cost incurred by sub-grantees to comply with asbestos training requirements may be charged to the Health & Safety budget category.

Client Education

- Inform the client in writing that suspected ACMs are present and what precautions will be taken to ensure the occupants' and workers' safety during weatherization.
- Instruct client in writing not to disturb suspected ACM.
- Provide asbestos safety information to the client.
- Formally notify the client in writing of results, if testing was performed.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.

Training and Certification Requirements

- Train on how to recognize vermiculite.
- AHERA or state certification to conduct testing.

7.2c – Asbestos - on pipes, furnaces, other small covered surfaces

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

How do you address suspected ACM's (e.g., pipes, furnaces, other small surfaces) that will be disturbed through the course of weatherization work?
<ul style="list-style-type: none"> • Visual inspections of all surfaces and subsurfaces, piping, and equipment for suspected ACM. • Assume asbestos is present in suspect covering materials. • In homes where <i>friable</i> suspected ACM, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present: <ul style="list-style-type: none"> ○ The sub-grantee must take precautionary measures as if it contains asbestos, such as utilizing personal air monitoring. ○ Blower door testing must not be completed. ○ The costs associated with asbestos testing, abatement or encapsulation not eligible expenditures in the <i>Nebraska Weatherization Assistance Program</i>. • In homes with asbestos, as determined by an appropriately trained crew leader, auditor or inspector or testing, is present, encapsulated and in good condition: <ul style="list-style-type: none"> ○ Weatherization work may continue. ○ Blower door testing, using either negative or positive pressure techniques, must be completed. • Documentation regarding the presence of asbestos material by an appropriately trained crew leader, auditor or inspector or testing must be maintained in the client file. • When deferral is necessary due to asbestos, the home owner/occupant must provide remediation documentation indicating the remediation was completed by an Asbestos Hazard Emergency Response Act of 1986 (AHERA) certified professional, prior to weatherization. A copy of the documentation must be included in the client file.
Testing Protocols
<ul style="list-style-type: none"> • Visual inspections of all surfaces and subsurfaces, piping, and equipment for suspected ACM. • AHERA sample testing must be conducted by a certified tester, however sampling, testing, encapsulation and remediation costs are not eligible expenditures in the <i>Nebraska Weatherization Assistance Program</i>. • Cost incurred by sub-grantees to comply with asbestos training requirements may be charged to the Health & Safety budget category.
Client Education
<ul style="list-style-type: none"> • Inform the client in writing that suspected ACMs are present and what precautions will be taken to ensure the occupants' and workers' safety during weatherization. • Instruct client in writing not to disturb suspected ACM. • Provide asbestos safety information to the client. • When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.
Training and Certification Requirements
<ul style="list-style-type: none"> • How to identify suspected ACM. • Cost incurred by sub-grantees to comply with asbestos inspection training requirements may be charged to the Health & Safety budget category.

7.5 – Biologicals and Unsanitary Conditions (odors, mustiness, bacteria, viruses, raw sewage, rotting wood, etc.)		
Concurrence, Alternative, or Deferral		
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>
Unallowable Measure <input type="checkbox"/>		
Funding		

DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
What guidance do you provide Subgrantees for dealing with biological and/or unsanitary conditions in homes slated for weatherization?				
<ul style="list-style-type: none"> Remediation of <i>minor</i> conditions that may lead to or promote biological concerns and unsanitary conditions is allowed. Subgrantees are limited to a maximum cost of \$300 to remediate these <i>minor</i> conditions, although approval to exceed this limitation will be reviewed on a case by case basis by the Nebraska Energy Office <i>prior</i> to any work being implemented. Addressing bacteria, viruses or major biological and/or unsanitary conditions <i>is not</i> an allowable reimbursable cost. Deferral may be necessary in cases where conditions in the home pose a health risk to occupants and/or weatherization workers. 				
Testing Protocols				
<ul style="list-style-type: none"> Sensory inspection. 				
Client Education				
<ul style="list-style-type: none"> Inform client in writing of observed conditions. Provide information on how to maintain a sanitary home. When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence. 				
Training				
<ul style="list-style-type: none"> How to recognize unsafe conditions and when to defer. Safe work practices when encountering such conditions. 				

7.6 – Building Structure and Roofing				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
What guidance do you provide Subgrantees for dealing with structural issues (e.g., roofing, wall, foundation) in homes slated for weatherization?				
<ul style="list-style-type: none"> Building rehabilitation is beyond the scope of the <i>Nebraska Weatherization Assistance Program</i>. 				
How do you define “minor” or allowable structure and roofing repairs, and at what point are repairs considered beyond the scope of weatherization?				
<ul style="list-style-type: none"> When necessary to effectively weatherize the home, subgrantees may make <i>minor</i> repairs to allow for the implementation of weatherization measures. Subgrantees are limited to a maximum cost of \$300 to implement these <i>minor</i> repairs, although approval to exceed this limitation will be reviewed on a case by case basis by the Nebraska Energy Office <i>prior</i> to any work being implement. 				
If priority lists are used, and these repairs are designated as Incidental Repairs, at what point is a site-specific audit required?				
<ul style="list-style-type: none"> Priority Lists are not used. 				
Client Education				
<ul style="list-style-type: none"> 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. 				
Training				

- How to identify structural and roofing issues.

7.7 – Code Compliance				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
What guidance do you provide Subgrantees for dealing with code compliance issues in homes receiving weatherization measures?				
<ul style="list-style-type: none"> • Correction of preexisting code compliance issues is not an allowable unless triggered by weatherization measures being installed in a specific room or area of the home. • It is each sub-grantee’s responsibility to ensure that weatherization-related work conforms with the applicable codes in jurisdictions where the work is being performed. • Follow State and local or AHJ codes while installing weatherization measures, including H&S measures. • Condemned properties and properties where “red tagged” H&S conditions exist that cannot be corrected under this guidance and must be deferred. 				
What specific situations commonly trigger code compliance work requirements for your network? How are they addressed?				
<ul style="list-style-type: none"> • Examples of eligible costs associated with cost-effective Weatherization Measures include, but are not limited to: the installation of fans to provide appropriate ventilation in the home, appropriate disconnect switching and clearance requirements on furnace installations, installation of appropriately sized chimney liner when water heaters are orphaned by a high efficiency furnace installation, etc. Costs associated with the purchase of any required permits are eligible. • The cost of the permits must not be passed onto the client. • When correction of preexisting code compliance issues is triggered and paid for with WAP funds, specific code requirements with reference to the weatherization measure(s) that triggered the code compliance issue must be included in the client file. 				
Client Education				
<ul style="list-style-type: none"> • Inform client in writing of observed code compliance issues when it results in a deferral. • When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence. 				
Training				
<ul style="list-style-type: none"> • How to determine what code compliance may be required. 				

7.8 – Combustion Gases				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
Testing Protocols				

<ul style="list-style-type: none"> • Combustion safety testing is required when combustion appliances are present. • Test naturally drafting appliances for spillage and CO during CAZ depressurization pre- and post-weatherization and before leaving the home on any day when work has been done that could affect draft (e.g. tightening the home, adding exhaust) Include copies of all required CAZ Depressurization Test (WX9) and Daily Safety Test Out (WX10) testing WX forms in client file requirement. • Inspect venting of combustion appliances and confirm adequate clearances. • Run DOE-approved energy audit to determine if the appliance can be justified as an ECM prior to replacement as an H&S measure.
How are crews instructed to handle problems discovered during testing, and what are the specific protocols for addressing hazards that require an immediate response?
<ul style="list-style-type: none"> • Crew leaders and crews are directed to contact their weatherization coordinator or supervisor immediately if during their time on-site: <ul style="list-style-type: none"> ○ The <i>heating plant</i> or other combustion appliance is malfunctioning. ○ Household members exhibit symptoms that could be from carbon monoxide poisoning. Open windows or evacuate the house if necessary. ○ There is a strong odor of heating gas or sewer gas. Open windows or evacuate the house if necessary. ○ Existing conditions have changed in ways that would make proposed work difficult, dangerous or no longer cost-effective.
Client Education
<ul style="list-style-type: none"> • Provide client with combustion safety and hazards information.
Training
<ul style="list-style-type: none"> • How to perform appropriate testing, determine when a building is excessively depressurized, and the difference between air free and as-measured CO. • CO action levels.

7.9 – Electrical		
Concurrence, Alternative, or Deferral		
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>
Funding		
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input type="checkbox"/>
What guidance do you provide Subgrantees for dealing with electrical hazards, including knob & tube wiring, in homes slated for weatherization?		

Knob-and-Tube Wiring in Attics:

- The Nebraska State Electrical Board does not permit directly covering knob and tube wiring with insulation.
- In attics where knob-and-tube wiring has been previously covered and it has been determined to be cost-effective to install additional insulation, the insulation work **must** be completed:
 - when it has been determined where the wiring is located,
 - following a determination that it is actually still “active” , and
 - after the wiring has been appropriately covered to prevent direct contact with the insulation and to provide adequate air space (a minimum of 3 ½” clearance) for “cooling” of the wire.
- Appropriate shielding materials for concealing the knob-and-tube wiring **must** include gypsum board (5/8” or thicker), plywood or oriented strand board.
- Once the determination of the wire locations is documented in the client file, the wiring **must** be appropriately shielded to prevent direct contact with the additional insulation and to provide adequate air movement space for cooling of the wire, then insulated.
- In attic areas where knob-and-tube wiring penetrates the plane of the attic and extends up into a side or *knee wall*, a fire resistant baffling **must** be installed around the wire to provide sufficient space for air movement around the wire to provide adequate air space to accommodate the cooling of the wire, then insulated.

Knob-and-Tube Wiring in Sidewalls:

- Knob and tube wiring in sidewalls **must not** be covered by new insulation.
- If knob and tube wiring in walls is covered by existing insulation, additional insulation **must not** be installed.

Overloaded Electrical, Fuses and Splices:

- Serious electrical hazards exist when gross overloads such as over usage, overloaded outlets and/or oversized fuses are present. Should auditors and crews find such existing problems, they should notify the owner and note the problem in the client file. Weatherization measures that involve the installation of new equipment such as air conditioners, heat pumps or electric water heaters can exacerbate previously marginal overload problems to hazardous levels. Rewiring of a home is outside the scope of the weatherization program.
- Wiring splices **must** be enclosed in metal or plastic electrical boxes, fitted with cover plates. Electrical boxes in attics **must** be marked with a flag that is visible above the insulation. *Type-S-Fuses* **must** be sized according to the smallest gauge of wire in the circuit to be protected. The following gauge wire requires the following size fuse:

<u>Wire Gauge</u>	<u>Fuse Size</u>
12 gauge wire	20 amp fuse
14 gauge wire	15 amp fuse

- If no insulation is being installed in a home the existing fuses **must** remain intact. In homes that utilize fuses where attic insulation is being installed the State Electrical Board recommends the use of a licensed electrician for the installation of safety *Type-S-Fuses* as indicated in the National Electrical Code.
- When the H&S of the occupant/worker(s) is at risk, minor repairs may be completed as necessary to allow for the implementation of weatherization measures.
- Evaluate and if necessary provide sufficient over-current protection and damming (if required) prior to insulating building components containing knob and tube wiring, as required by the AHJ.

How do you define “minor” or allowable electrical repairs, and at what point are repairs considered beyond the scope of weatherization?

<input type="checkbox"/> Subgrantees are limited to a maximum cost of \$300 to implement these <i>minor</i> repairs, although approval to exceed this limitation will be reviewed on a case by case basis by the Nebraska Energy Office <i>prior</i> to any work being implemented.
If priority lists are used, and these repairs are designated as Incidental Repairs, at what point is a site-specific audit required?
<input type="checkbox"/> Priority Lists are not used.
Client Education
<input type="checkbox"/> When electrical issues are the cause of a deferral, provide information to client on over-current protection, overloading circuits, and basic electrical safety/risks.
Training
<input type="checkbox"/> How to identify electrical hazards.
<input type="checkbox"/> Local (or AHJ) code compliance

7.10 – Formaldehyde, Volatile Organic Compounds (VOCs), Flammable Liquids, and other Air Pollutants		
Concurrence, Alternative, or Deferral		
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>
Funding		
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input type="checkbox"/>
What guidance do you provide Subgrantees for dealing with formaldehyde, VOCs, flammable liquids, and other air pollutants identified in homes slated for weatherization?		
<ul style="list-style-type: none"> • Removal of pollutants is allowed and required if they pose a risk to workers. • If pollutants pose a risk to workers and removal cannot be performed or is not allowed by the client the unit <i>must</i> be deferred. • Refer to Hazardous Material Disposal section for more information. 		
Testing Protocols		
<ul style="list-style-type: none"> • Sensory inspection. 		
Client Education		
<ul style="list-style-type: none"> • Inform client in writing of observed hazardous condition and associated risks. • Provide client written materials on safety and proper disposal of household pollutants. • When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence. 		
Training		
<ul style="list-style-type: none"> • How to recognize potential hazards and when removal is necessary. 		

7.11 – Fuel Leaks		
<i>(please indicate specific fuel type if policy differs by type)</i>		
Concurrence, Alternative, or Deferral		
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>
Funding		
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input type="checkbox"/>
Remediation Protocols		

<ul style="list-style-type: none"> Notify utility and temporarily halt work when leaks are discovered that are the responsibility of the utility to address.
How do you define allowable fuel leak repairs, and at what point are repairs considered beyond the scope of weatherization?
<ul style="list-style-type: none"> Fuel leaks found on the property, but after (or behind) the meter must be repaired before weatherizing a unit. When a minor gas leak is found on the property, but before (or in front) of the meter, the utility service must be contacted before work can proceed.
Client Education
<ul style="list-style-type: none"> Inform client in writing if fuel leaks are detected.
Training
<ul style="list-style-type: none"> Fuel leak testing.

7.12 – Gas Ovens / Stovetops / Ranges				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
What guidance do you provide Subgrantees for addressing unsafe gas ovens/stoves/ranges in homes slated for weatherization?				
<ul style="list-style-type: none"> Maintenance on or repair gas cooktops and stoves is not allowed. Replacement is not allowed. 				
Testing Protocols				
<ul style="list-style-type: none"> Test gas ovens for CO. Inspect cooking burners and ovens for operability and flame quality. 				
Client Education				
<ul style="list-style-type: none"> Inform client of the importance of using exhaust ventilation when cooking and the importance of keeping burners clean to limit the production of CO. Provide client with combustion safety and hazards information, including the importance of using exhaust ventilation when cooking and the importance of keeping burners clean to limit the production of CO. Provide client with verbal and written information on the use of the CO detector. 				
Training				
<ul style="list-style-type: none"> Testing techniques. CO action levels. 				

7.13 – Hazardous Materials Disposal				
[Lead, Refrigerant, Asbestos, Mercury (including CFLs/fluorescents), etc.]				
<i>(please indicate material where policy differs by material)</i>				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>

Client Education
<ul style="list-style-type: none"> • Inform client in writing of hazards associated with hazardous waste materials being generated/handled in the home.
Training
<ul style="list-style-type: none"> • Appropriate Personal Protective Equipment (PPE) for working with hazardous waste materials. • Disposal requirements and locations. • Health and environmental risks related to hazardous materials.
Disposal Procedures and Documentation Requirements
<ul style="list-style-type: none"> • Hazardous Waste Materials generated in the course of weatherization work shall be disposed of according to local laws, regulations and/or Federal guidelines, as applicable. • Document proper disposal requirements in contract language with responsible party. • Refer to Lead and Asbestos sections for more information on those topics.

7.14 – Injury Prevention of Occupants and Weatherization Workers (Measures such as repairing stairs and replacing handrails)				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
What guidance do you provide Subgrantees regarding allowable injury-related repairs (e.g., stairs, handrails, porch deck board)?				
<ul style="list-style-type: none"> • When necessary to effectively weatherize the home, workers may make <i>minor</i> repairs and installations to allow for the implementation of weatherization measures. 				
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.				
<ul style="list-style-type: none"> • Subgrantees are limited to a maximum cost of \$200 to implement these <i>minor</i> repairs, although approval to exceed this limitation will be reviewed on a case by case basis by the Nebraska Energy Office <i>prior</i> to any work being implemented. 				
Training				
<ul style="list-style-type: none"> • Hazard identification. • Inspecting for dangers that could prevent weatherization. 				

7.15 – Lead Based Paint				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
Safe Work Protocols				

<ul style="list-style-type: none"> • Crews must follow EPA’s Lead; Renovation, Repair and Painting Program (RPP) when working in pre-1978 housing unless testing confirms the work area to be lead free. • Deferral is required when the extent and condition of the lead-based paint in the house would potentially create further H&S hazards, the sub-grantee will inform the client of the of the issues associated with a deferral in the Weatherization Deferral Notice (Form WX4) completed by the Weatherization Representative and signed by the client or building owner. • Only those costs directly associated with the testing and lead safe practices for surfaces directly disturbed during weatherization activities are allowable.
Testing Protocols
<ul style="list-style-type: none"> • Testing to determine the presence of lead in paint that will be disturbed by WAP measure installation is allowed with EPA-approved testing methods. • Testing methods must be economically feasible and justified. • Job site set up and cleaning verification by a Certified Renovator is required. • Grantees must verify that crews are using lead safe work practices during monitoring.
Client Education
<ul style="list-style-type: none"> • Follow pre-renovation education provisions for RRP. • When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence. Provide a Weatherization Deferral Notice (Form WX4) completed by the Weatherization Representative and signed by the client or building owner.
Training and Certification Requirements
<ul style="list-style-type: none"> • All employees and contractors working on pre-1978 homes must receive training to install measures in a lead-safe manner in accordance with SWS and EPA protocols, and installation must be overseen by an EPA Certified Renovator. • Grantee Monitors and Inspectors must be Certified Renovators.
Documentation Requirements
<ul style="list-style-type: none"> • Documentation in the client file must include Certified Renovator certification: any training provided on-site; description of specific actions taken; lead testing and assessment documentation; and, photos of site containment set up. Include the location of photos referenced is not in the file.

7.16 – Mold and Moisture		
(Including but not limited to: drainage, gutters, down spouts, extensions, flashing, sump pumps, dehumidifiers, landscape, vapor retarders, moisture barriers, etc.)		
Concurrence, Alternative, or Deferral		
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>
Funding		
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input type="checkbox"/>
<p>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?</p>		

- Sub-grantees **must** ensure that weatherization work is performed in a manner that does not cause or contribute to mold problems, and when the work is performed properly, may alleviate mold conditions.
- Where severe Mold and Moistures cannot be addressed, deferral is required.
- Mold cleanup is not an allowed H&S cost.
- Surface preparation where weatherization measures are being installed (e.g., cleaning mold off window trim in order to apply caulk) must be charged as part of the ECM, not to the H&S budget category.
- All clothes dryers and exhaust fans **must** be vented to the exterior.
- The NeWAP requires a full ground laid moisture barrier **must** be installed whenever possible in accessible *crawl spaces* and under manufactured and modular homes *except* when one exists or the space has a concrete floor.
 - The moisture barrier **must** be a Class I *vapor retarder*, a minimum of 6 mils thick, extended up the walls and the support columns at least 12 inches and the joints **must** overlap a minimum of 12 inches.
 - In the event the entire floor cannot be covered, all accessible areas **must** receive a moisture barrier.
 - When installing insulated skirting without adequate clearance to install a full ground laid moisture barrier, the moisture barrier **must** extend a minimum of 24 inches beyond the insulation.

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

- **Limited** water damage repairs that can be addresses by weatherization workers are allowed when necessary in order to weatherize the home and to ensure the long-term stability and durability of the measures. Subgrantees are limited to a maximum cost of \$300 to implement these **limited** repairs, although approval to exceed this limitation will be reviewed on a case by case basis by the Nebraska Energy Office **prior** to any work being implemented.
- **Minor** source control work (i.e. correction of moisture and mold creating conditions) is allowed when necessary in order to weatherize the home and to ensure the long-term stability and durability of the measures. Source control is independent of latent damage and related repairs. Subgrantees are limited to a maximum cost of \$300 to implement this **minor** source control work, although approval to exceed this limitation will be reviewed on a case by case basis by the Nebraska Energy Office **prior** to any work being implemented.

Client Education

- Provide client written notification and disclaimer on mold and moisture awareness.
- Provide information on the importance of cleaning and maintaining drainage systems.
- Provide information on proper landscape design and how this impacts site drainage and moisture control.
- When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence.
- Sub-grantees **must** include some form of notification or disclaimer to the client upon the discovery of a mold condition. The notification should include what was or will be done to the house that is expected to alleviate the condition and/or that the work performed should not promote new mold growth. The notification **must** be signed by the client and the owner (if the client is a renter) and placed in the client file (Form WX5).
- Inform client of any observed conditions regarding minor drainage issues.
- Provide guidance on the importance of cleaning and maintaining gutters and drainage systems and the impact on mold and moisture issues in the home when the drainage systems are not maintained.

Training
<ul style="list-style-type: none"> • National curriculum on mold and moisture or equivalent. • How to recognize drainage issues.

7.17 – Pests				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
What guidance do you provide Subgrantees for dealing with pests and pest intrusion prevention in homes slated for weatherization?				
<ul style="list-style-type: none"> • Pest removal is allowed only where infestation would prevent weatherization. Subgrantees are limited to a maximum cost of \$300 for pest removal, although approval to exceed this limitation will be reviewed on a case by case basis by the Nebraska Energy Office <i>prior</i> to any work being implemented. • Infestation of pests may be cause for deferral where it cannot be reasonably removed or poses H&S concern for workers. • Screening of windows and points of access, and incorporating pest exclusion into air sealing practices to prevent intrusion is allowed. 				
Define Pest Infestation Thresholds, Beyond Which Weatherization Is Deferred				
<ul style="list-style-type: none"> • Pest removal issues that would exceed the maximum cost of \$300 to remedy must be deferred and information must be provided to the client in writing describing conditions that must be addressed in order for weatherization to commence. 				
Testing Protocols				
<ul style="list-style-type: none"> • Assessment of presence and danger of infestation and risk to worker. 				
Client Education				
<ul style="list-style-type: none"> • Inform client in writing of observed condition and associated risks. • When deferral is necessary, provide information in writing describing conditions that must be met in order for weatherization to commence. 				
Training				
<ul style="list-style-type: none"> • How to assess presence and degree of infestation, associated risks, and deferral policy. 				

7.18 – Radon				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
What guidance do you provide Subgrantees around radon?				

<ul style="list-style-type: none"> • Radon mitigation is not an allowable H&S cost. • Clients must sign a radon informed consent/consent to perform work form (Wx6) prior to receiving weatherization services. This form must be kept in the client file. • The following radon precautions will be implemented in all weatherized homes to reduce the possibility of exacerbating any potential radon issues: <ul style="list-style-type: none"> ○ Whenever site conditions permit, cover exposed dirt floors within the pressure/thermal boundary with 6 mil (or greater) polyethylene sheeting, lapped at least 12” and sealed with appropriate sealants at all seams, walls and penetrations. ○ Air seal existing sumps in such a way that water can drain from above and below the sump cover. ○ Seal and caulk visible, accessible penetrations, openings or cracks in below-grade walls and floors that contact the ground with a sealant that meets the requirements of ASTM C920. ○ Other precautions may include, but are not limited to, sealing any observed floor and/or foundations penetrations isolating the basement from the conditioned space, and ensuring crawlspace venting is installed. • The following additional radon precautions will be implemented in all weatherized homes equipped with active radon mitigation systems: <ul style="list-style-type: none"> ○ Verify that the radon vent fan is operating. ○ If a previously installed radon mitigation system is not operating correctly advise the client to consult the system installer of the state radon office.
Testing Protocols
<ul style="list-style-type: none"> • Radon testing is not an allowable cost.
Client Education
<ul style="list-style-type: none"> • Provide all clients EPA’s <i>A Citizen’s Guide to Radon</i> and inform them of radon related risks. • Review with all clients the radon informed consent/consent to perform work form (Wx6). The form must be signed with a copy of the included in the client file prior to receiving weatherization services.
Training and Certification Requirements
<ul style="list-style-type: none"> • Auditors, assessors and inspectors must have knowledge of radon, what it is and how it occurs, including factors that may make radon worse, and precautionary measures that may be helpful. • Workers must be trained in proper vapor retarder installation.
Documentation Requirements
<ul style="list-style-type: none"> • Provide all clients EPA’s <i>A Citizen’s Guide to Radon</i> and inform them of radon related risks. • Provide all clients the radon informed consent/consent to perform work form (Wx6) signed. A copy of the signed form must be included in the client file prior to receiving weatherization services.

7.19 – Safety Devices: Smoke and Carbon Monoxide Alarms, Fire Extinguishers				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
What is your policy for installation or replacement of the following:				

<p>Smoke Alarms:</p> <ul style="list-style-type: none"> Battery Operated smoke alarms may be installed where alarms are not present or are inoperable. Installation of Smoke Alarms and Carbon Monoxide Detectors, as per manufacturer's instructions, is required on initial inspection of the home. Battery operated or plug-in 110 Volt Detectors, located one per sleeping level and one adjacent to a combustion appliance, are eligible for reimbursement.
<p>Carbon Monoxide Alarms:</p> <ul style="list-style-type: none"> CO detectors must be installed where detectors are not present or are inoperable. Replacement of operable CO Detectors is not an allowable cost. Installation of Smoke Alarms and Carbon Monoxide Detectors, as per manufacturer's instructions, is required on initial inspection of the home. Battery operated or plug-in 110 Volt Detectors, located one per sleeping level and one adjacent to a combustion appliance, are eligible for reimbursement. <p>Propane Gas Detectors:</p> <ul style="list-style-type: none"> Must be installed in homes and manufactured housing on permanent foundations that have propane combustion appliances. The gas detectors must be permanently installed according to the manufacturer's instructions and 110 volts.
<p>Fire Extinguishers:</p> <ul style="list-style-type: none"> The costs associated with providing fire extinguishers are not allowable Health & Safety Costs.
Testing Protocols
<ul style="list-style-type: none"> Check existing smoke alarms for operation. Check for operation of existing CO detectors. Verify operation of installed alarms.
Client Education
<ul style="list-style-type: none"> Provide the client with verbal and written information on the use of smoke detectors and CO detectors. Provide client with combustion safety and hazards information, including the importance of using exhaust ventilation when cooking and the importance of keeping burners clean to limit the production of CO.
Training
<ul style="list-style-type: none"> Where to install smoke alarms and CO detectors. Local code compliance.

7.20 – Occupant Health and Safety Concerns and Conditions				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input checked="" type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
What guidance do you provide Subgrantees for soliciting the occupants' health and safety concerns related to components of their homes?				
<ul style="list-style-type: none"> Prior to any on-site inspection work being scheduled in a home, sub-grantee intake personnel will assist clients in completing a Weatherization Client Questionnaire (WX13) as part of the application process. <ul style="list-style-type: none"> The questionnaire provides information on concerns or issues such as non-working furnaces, foundation issues, leaks, debris, pet/pest issues, broken glazing, etc. in the home that impact not only the client's safety but the safety of weatherization workers. The questionnaire will be included in the client file for future reference. 				

<p>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?</p>		
<ul style="list-style-type: none"> • Sub-grantee personnel will interview and assist clients in completing a Health & Safety Home Screening Questionnaire (WX7) as part of the application process. <ul style="list-style-type: none"> o The survey will be included in the client file for future reference. o The Energy Auditor will then review the Questionnaire with the client at the time of the initial assessment. o The information collected during this process will be used in determining the best course of action for weatherization of the home. 		
<p>What guidance do you provide Subgrantees for dealing with potential health concerns when they are identified?</p>		
<ul style="list-style-type: none"> • If it is determined through the Health & Safety Home Screening Questionnaire that someone in the home is sensitive to a product that is intended to be used during the weatherization process, the sensitivity <i>must</i> be documented in the file and, if possible, an alternative product may be used. If no successful alternative is found, the weatherization of the home may proceed without completion of the measure with no impact on weatherization measures with lower <i>SIRs</i>, with prior <i>Nebraska Energy Office approval</i>. • When a client's health is fragile and/or the weatherization activities would constitute a health or safety hazard, the occupants at risk will be required to leave the home during the activities and requested to return at least 1 hour (or a reasonable time as determined by the installers) after installers are scheduled to leave to allow for clean-up and appropriate ventilation of the home. • Weatherization funds cannot be used to relocate clients or reimburse them for such costs incurred as a result of the requirement to leave during the day. If the client is unable to leave the home and the intended work may exacerbate an occupant's health condition, the home may need to be deferred. • Sub-grantees must take all reasonable precautions against performing work on homes that would subject clients to Health & Safety risks. 		
<p style="text-align: center;">Client Education</p>		
<p>Clients will also receive the following publications and/or documents:</p> <ul style="list-style-type: none"> • Health & Safety Home Screening Questionnaire (Form WX7) • Renovate Right (occupants of all buildings built pre-1978) • Lead Hazard Pre-Renovation Form (Form WX3) • A Brief Guide to Mold, Moisture and your Home • Nebraska Mold Assessment and Release Form (Form WX5) • Consumer Product Safety Asbestos Fact Sheet • Nebraska WAP Even More Dollar and Energy Savings Brochure • Weatherization Deferral Notice (Form WX4) • Client Education Confirmation of Receipt (Form WX2) • Radon Informed Consent/Consent to Perform Work (WX6) • EPA's A Citizen's Guide to Radon 		
<p>Documentation Form(s) have been developed and comply with guidance?</p>		<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>

7.20.1 – Infectious Disease Preparedness and Response

Concurrence, Alternative, or Deferral

Concurrence with Guidance Alternative Guidance Results in Deferral

Funding

DOE LIHEAP State Utility Other

Guidance for Client Intake and Office Procedures

- Allow and encourage appropriate physical distancing and avoid groups of people as allowed in state and local Health Department Directed Health Measures (DHM) as per <http://dhhs.ne.gov/Pages/COVID-19-Directed-Health-Measures.aspx>
- Encourage staff participation in virtual training conferences, meetings etc.
- Minimize non-essential travel and adhere to CDC guidelines regarding isolation following travel.
- Require sick employees to stay home.
- Do not attend onsite training and/or meetings and conferences sooner than allowed per state and local Health Department Directed Health Measures (DHM) as per <http://dhhs.ne.gov/Pages/COVID-19-Directed-Health-Measures.aspx>.
- Collect applications remotely, if possible, and in instances where remote applications are not plausible, identify and implement strict distancing protocols.
- Complete program intake and eligibility determination, including client signing application verifying accuracy of information utilizing all efforts to minimize client exposure and maximize client services.
- Prior to sending workers to a home Sub-grantees are required to complete a supplementary screening, in addition to the Home Health and Safety Screening Questionnaire (Form Wx7), to provide additional information regarding suspected health concerns associated with Covid-19 or other infectious diseases. The health and safety of local crew and contractors depends on this type of screening during the COVID-19 or any other infectious disease outbreak, and clients who are not feeling well or who have contracted a virus can be put on a deferred waitlist. Screening should be complete via telephone (instead of traveling to any client dwelling) during in the application process and again within 24 hours prior to beginning any on-site work. Screening questions should include, but not be limited to:
 - Has anyone in the household tested positive or are presumed positive for COVID-19? If so, have they met the CDC criteria to be around others per the section “When it’s safe to be around others: ending home isolation?”
 - Has anyone in your household experienced fever, cough or shortness of breath in the last two weeks?
 - Has anyone in your household been in contact with someone who has had a fever, cough or shortness of breath in the last two weeks?
 - Does anyone in the household have underlying medical conditions or are they in frequent contact with someone who has underlying medical conditions?

Guidance for Scheduling and On-Site Installations

- Grantees, Sub-grantees and their contractors **must** adhere to all state and local Health Department DHMs as per <http://dhhs.ne.gov/Pages/COVID-19-Directed-Health-Measures.aspx>
- If infectious disease health concerns exist, place eligible vulnerable clients on a waitlist, giving them priority once the state or local jurisdiction is implementing standard weatherization services. All vulnerable individuals should continue to shelter in place throughout the outbreak, these individuals are defined as:

- Elderly individuals.
- Individuals with serious underlying health conditions, including high blood pressure, chronic lung disease, diabetes, obesity, asthma, and those whose immune system is compromised such as by chemotherapy for cancer and other conditions requiring such therapy.
- Sub-Grantee and Grantee weatherization staff **must** follow with the EPA's *Guidance for Cleaning and Disinfecting Public Spaces, Workplaces, Businesses, Schools, and Homes*.
- Sub-grantees **must** implement the following Infectious Disease Preparedness and Response policies and procedures for all crew and contractor on-site work completed during a disease outbreak:
 - Mandate all field workers to use appropriate Personal Protective Equipment (PPE) as per the required training referenced below including removal, and cleaning to avoid contamination (and cross-contamination).
 - Provide the necessary supplies to maintain clean surfaces in client homes both before and after they are performing work.
 - Limit off site trips during the delivery of weatherization services.
 - Provide all vehicles and crew members with hand sanitizer containing at least 60% alcohol.
 - Prioritize the completion of all exterior work prior to addressing the interior work in the client home.
 - Practice social distancing.
 - Minimize the number of crew and clients simultaneously in the home at the time of interior work.
 - During interior work asks clients if they can leave the home, isolate themselves into one room or install a physical barrier (i.e. clear sheet of plastic, or zip wall) while work is being conducted.
 - Offer face masks to clients to contain respiratory secretions.
 - Limit contact by allowing one driver per vehicle per day and disinfect the vehicle before and after use.
 - If the installer determines that a client is exhibiting respiratory illness, they should contact the Agency Weatherization Director or Executive Director to inform them of the concern and allow the client to be moved to a waitlist for an appropriate time period to ensure worker safety.

Guidance for Inspections and Monitoring

- Grantees and Sub-grantees **must** adhere to all state and local Health Department DHMs as per <http://dhhs.ne.gov/Pages/COVID-19-Directed-Health-Measures.aspx>
- During an infectious disease outbreak Grantees and Sub-grantees should combine, as much as possible home visits with the contractor/crew final workday and/or Quality Control Inspection (QCI) to limit the number of visits to the home.
- Grantees should modify existing monitoring protocols to ensure they can safely work in local organization offices and client homes to evaluate the local agency's safety protocols and client satisfaction.
- Sub-Grantee and Grantee weatherization staff **must** follow with the EPA's *Guidance for Cleaning and Disinfecting Public Spaces, Workplaces, Businesses, Schools, and Homes*.

Client Education

Clients will receive electronic links (paper copies if electronic technology isn't available) to the following publications:

- Coronavirus Disease 2019: General Information
<http://dhhs.ne.gov/Documents/COVID-19%20General%20Public%20Fact%20Sheet.pdf>

<ul style="list-style-type: none"> Coronavirus Disease 2019 (COVID-19): General Guidance and Testing Information http://dhhs.ne.gov/Documents/COVID-19%20Guidance%20to%20Public%20and%20Testing.pdf
Training
<ul style="list-style-type: none"> Prior to implementing weatherization services, all Sub-Grantee and Grantee weatherization staff must satisfactorily complete the SFCC COVID-19 Workplace Safety class developed and provided by the Energy Smart Academy in the Santa Fe Community College, Santa Fe, New Mexico (SFCC).

7.21 – Ventilation and Indoor Air Quality				
Concurrence, Alternative, or Deferral				
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>		
Funding				
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
Identify the Most Recent Version of ASHRAE 62.2 Implemented (optional: identify Addenda used)				
<ul style="list-style-type: none"> Install ventilation as required by the last DOE approved ASHRAE 62.2. Grantees may voluntarily elect to adopt the most recent version of ASHRAE 62.2 as soon as they are prepared to implement the Standard. If the ASHRAE normative Appendix A is employed and an existing fan is being replaced or upgraded to meet whole-house ventilation requirements, take actions to prevent zonal pressure differences greater than 3 pascals across the closed door, if one exists. Exhaust fans must be vented to the outdoors, and never into building attics or <i>crawl spaces</i>. They should have tight-fitting <i>backdraft dampers</i>. Low sone (1.0) fans should be installed to encourage the client to run them longer. 				
Testing and Final Verification Protocols				
<ul style="list-style-type: none"> ASHRAE 62.2 evaluation to determine required ventilation. Measure fan flow of existing fans and of installed equipment to verify performance. 				
Client Education				
<ul style="list-style-type: none"> Provide client with information on function, use, and maintenance (including location of service switch and cleaning instructions) of ventilation system and components. Provide client with equipment manuals for installed equipment. Include disclaimer that ASHRAE 62.2 does not account for high polluting sources or guarantee indoor air quality. 				
Training				
<ul style="list-style-type: none"> ASHRAE 62.2 training, including proper sizing, evaluation of existing and new systems. If the Grantee opts to adopt a new version of ASHRAE 62.2 then training and technical assistance should be planned to prepare crews to implement the new Standard. 				

7.22 – Window and Door Replacement, Window Guards		
Concurrence, Alternative, or Deferral		
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>
Funding		

DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/>	Utility <input type="checkbox"/>	Other <input type="checkbox"/>
What guidance do you provide to Subgrantees regarding window and door replacement and window guards?				
<ul style="list-style-type: none"> Replacement, repair, or installation of Windows, Doors and Window Guards is not an allowable Health & Safety measures through the NeWAP. 				
Testing Protocols				
<ul style="list-style-type: none"> Not applicable. 				
Client Education				
<ul style="list-style-type: none"> Provide information on lead risks wherever issues are identified. 				
Training				
<ul style="list-style-type: none"> Awareness of guidance. 				

7.23 – Worker Safety (OSHA, etc.)		
Concurrence, Alternative, or Deferral		
Concurrence with Guidance <input checked="" type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>
Funding		
DOE <input checked="" type="checkbox"/>	LIHEAP <input checked="" type="checkbox"/>	State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input type="checkbox"/>
How do you verify safe work practices? What is your policy for in-progress monitoring?		
<ul style="list-style-type: none"> On-site inspections of in-progress units are completed on 10-15% of all units for each subgrantee. In-progress inspections are completed monthly or every other month as needed to reach targeted percentage of units per subgrantee. 		
Training and Certification Requirements		
<ul style="list-style-type: none"> OSHA-10 hour training is provide as a Specific training to all contractors and installers in the NeWAP network. 		

7.24 – <Add in Topic>		
Concurrence, Alternative, or Deferral		
Concurrence with Guidance <input type="checkbox"/>	Alternative Guidance <input type="checkbox"/>	Results in Deferral <input type="checkbox"/>
Funding		
DOE <input type="checkbox"/>	LIHEAP <input type="checkbox"/>	State <input type="checkbox"/> Utility <input type="checkbox"/> Other <input type="checkbox"/>
Remediation Protocols		
Testing Protocols		
Client Education		
Training		