



Louisiana Weatherization Health and Safety (H&S) Plan

1.0 – GENERAL INFORMATION

Additional information that does not fit neatly in one of the other sections of this document.

All DOE WAP funded Health and Safety Measures outlined in this Guidance must be completed consistent with the requirements of the DOE/NREL Standard Work Specifications (SWS) <https://sws.nrel.gov/> and this [H&S Plan](#).

2.0 – BUDGETING

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

Select which option used below.

Separate H&S Budget

Contained in Program Operations

3.0 – H&S EXPENDITURE LIMITS

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

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

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

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

15 percent is not a maximum limit on H&S expenditures. DOE will conduct a secondary level of review on H&S Plans with a Grantee request of more than 15 percent of Program Operations used for H&S purposes, . **DOE strongly encourages using the table below in developing justification for the requested H&S budget amount.** In accordance with [10 CFR 440.18\(d\)\(15\)](#), these funds are to be expended by the Program in direct weatherization activities, “of which is necessary before, or because of, installation of

weatherization materials.” This same section of the regulation excludes the H&S costs from the ACPU limitation if H&S costs are budgeted separately.

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

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

The elimination of health and safety hazards is essential before installing weatherization materials on an approved property. This task is accounted for in a separate budget category of the Louisiana Grant Application.

Subgrantees may use funds to abate energy-related Health and Safety hazards only if elimination of such hazards are necessary before or as a result of installation of weatherization materials.

For example, the measure “Repair Leak/Adding a Gas Line” listed in the H&S Measure Matrix is allowable as a Health and Safety cost ONLY if it is done in conjunction with replacement of a heating system as a Health and Safety cost; or if it is to repair an existing gas line as a Health and Safety cost. It is not allowable as a Health and Safety cost to add gas lines for new systems installed as Energy Conservation Measures (ECMs).

LHC will review and track Subgrantee Health and Safety expenditures throughout the grant period. If it appears that a Subgrantee will have unexpended Health and Safety funds, the funds will be reprogrammed to the Program Operations line budget line and additional DOE WAP units will be completed.

LHC’s Software of Record (Hancock) contains a Job Funding Limit feature for each Funding Source and Budget Type. LHC uses this feature to define a Funding Limit for overall Health and Safety expenditures on a job. The limit is changed annually, and the Total Average H&S Cost Per Unit as defined by the Health and Safety Plan – H&S Measure Matrix (below) is used as the limit. Any time Health and Safety expenditures on a unit exceed this limit, LHC review and approval will be triggered within the software. LHC must give approval within Hancock before the expenses can be added to the invoice.

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

Instructions: Double-click icon directly below to open, view and edit Measure Matrix Spreadsheet. Complete the spreadsheet by entering the required information. To save, close the spreadsheet and it will save to this document.



Measure Matrix
Final.xlsx

H&S Measure Matrix			
Double Click To Open For Editing			
Cells This Shade Auto-Calculate			
Measure	Average Cost	Frequency Installed/ Completed	Auto-Calculated Average Cost
Bathroom Exhaust Fan	\$189.94	35.4%	\$67.24
Blocking Heat Producing Devices	\$40.92	1.3%	\$0.51
Combustion Problems in CAZ	\$101.63	2.5%	\$2.52
Dryer Venting	\$86.27	93.2%	\$80.37
Install C/O Alarm	\$74.74	98.1%	\$73.35
Install GFI	\$1.03	1.0%	\$0.01
Install Smoke Alarm	\$78.35	98.1%	\$76.89
Install Window Heat or A/C Unit	\$811.99	3.1%	\$25.22
Range Hood Install	\$392.84	59.6%	\$234.24
Remove Unvented Space Heater	\$333.37	11.2%	\$37.27
Repair Leak/Adding a Gas Line	\$185.91	6.2%	\$11.55
Replace Mercury Thermostat	\$80.00	5.6%	\$4.47
Replace Unvented Space Heater	\$1,978.82	10.6%	\$208.94
Vent Existing Exhaust Appliance Outside	\$213.23	43.5%	\$92.71
Water Heater Pressure Relief Valve	\$45.82	35.4%	\$16.22
Water Heater Replacement	\$635.87	6.8%	\$43.44
Whole House Ventilation	\$473.43	58.4%	\$276.41
Zonal Pressure Combustion Make Up Air	\$147.99	4.3%	\$6.43
Total Average H&S Cost Per Unit			\$1,257.78
Enter Estimated Production (Annual File: IV.2 WAP Production Schedule)			249
Enter Estimated Program Operations Budget (Annual File - Budget)			\$1,810,385.00
H&S Budget (Total Average H&S Cost Per Units * Estimated Production)			\$313,188.41
Suggested H&S Budget Request			17.300%

4.0 – INCIDENTAL REPAIR MEASURES

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

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

No Health and Safety measures will be identified as incidental repair measures (IRMs) this year.

5.0 – OCCUPANT PRE-EXISTING OR POTENTIAL HEALTH CONDITIONS AND HAZARD IDENTIFICATION AND NOTIFICATION FORM(S)

Grantees must include policies/procedures for informing clients of the aspects of weatherization that may put a client with pre-existing health conditions at risk during installation of measures. This screening may occur as part of the initial application for weatherization and/or during the energy audit. Procedures must include what steps will be taken and/or available to the client to ensure that weatherization work will not aggravate pre-existing health conditions. Additionally H&S assessments are required to identify hazards in the home. For those hazards identified, appropriate testing is required when applicable. The client/landlord/property manager must be informed in writing of all testing results, including identification of a hazards revealed by the testing that will lead to deferral/referral.

Grantees are required to develop documentation forms that include at a minimum:

- **Occupant Pre-existing or Potential Health Conditions;**
 - Screen occupant(s) to self-report known or suspected health concerns either as part of initial application for weatherization, during the energy audit, or other parts of the weatherization process as specified;
 - Inform client in writing of any known risks; and
 - Provide client with Subgrantee point of contact information in writing so client can inform of any issues.
- **Hazard Identification Notification Form**
 - The occupant(s) (and Landlord's, if applicable) name and address;
 - Date(s) of the energy audit/assessment and when the occupant(s) (and Landlord, if applicable) was informed of a potential H&S issue;
 - A clear description of the problem;
 - A statement indicating if, or when weatherization could continue; and
 - The occupant(s) (and Landlord's, if applicable) signature(s) indicating that they understand and have been informed of their rights and options.

Procedure for soliciting occupants' health and safety concerns related to components of their homes

Subgrantees are required to gather occupant health information as part of the initial client application process. This takes place before any work is performed on the home by the Subgrantee auditor or subcontractor.

Procedure for determining whether occupants suffer from health conditions which may be negatively impacted by the act of weatherizing their dwelling

This occupant health information is then discussed with the client during the interview process. Weatherization Subgrantees and their representatives, including subcontractors, are trained to notify the clients of any health and safety conditions that may be exacerbated through receiving WAP services. All reasonable precautions will be taken against performing work on homes that will subject the workers, occupants or themselves to health and/or safety risks.

Procedure for addressing potential health concerns including pre-existing health conditions when they are identified

In cases where an occupant's health is fragile, or an occupant has been identified to have pre-existing health condition, including allergies, and/or the crew work activities would themselves constitute a health and/or safety hazard, the occupant(s) at risk may be required to leave during the performance of the work activities. In cases where an occupant is identified as having an allergy to a specific weatherization material, that material will not be installed. If comparable alternative materials are available and the occupant has no known allergic to the alternative materials and they meet DOE regulations, crews may substitute the alternative material(s). If no safe alternative material, meeting DOE standards, is available, LHC must provide written approval before proceeding. This must be well documented in the client file. Louisiana uses a **Hazard Identification Notification** form which include the client's name and address, dates of the audit/assessment, when the client was informed of a potential health and safety 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 included for review?

Yes No

Location where forms have been uploaded/submitted

Separate attachment to SF424 Separate attachment to H&S Plan

6.0 – HEALTH AND SAFETY CATEGORIES

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

- Explain whether you concur with existing guidance from Weatherization Program Notice (WPN) 17-7 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 require comprehensive explanations as to how it meets the intent of DOE guidance.
- Where an action/allowability or testing is “required” or “not allowed” through WPN 17-7, Grantees must concur, or choose to defer all units where the specific category is encountered.
- Any activities that are marked as deferral/referrals must contain the H&S reasons specified within the Master File Section V.1.2 Box 5 Deferral/Referral.
- Unless an alternate funding source(s) is declared, utilize DOE funds to address the particular category.
- Describe the explicit methods to address the specific category.
- Describe in detail what testing protocols (if any) used to assess the particular category.
- Define and quantify minimum thresholds that determine minor, major, and limited definitions and the criteria used to make a determination on a case-by-case basis.
- Define “at-risk” occupant(s) and identify minimum documentation requirements for them.
- Client Education activities specific to H&S reasons is required within the Master File Section V.8.4 Training and Technical Assistance of the annual application.
- Training activities specific to H&S reasons is required within the Master File Section V.8.4 Training and Technical Assistance of the annual application.

6.1 – Air Conditioning and Heating Systems

Concurrence, Alternative or Deferral

Concurrence with DOE Guidance Alternative Guidance Results in Deferral/Referral

Air Conditioning Unallowable with DOE Funds Heating Unallowable with DOE Funds

Other Funding Source Addresses H&S Issue DOE LIHEAP

Procedure for unsafe or non-functioning primary heating/cooling systems

“Red tagged,” inoperable, or nonexistent primary heating system may be replaced, repaired, or installed where climate conditions warrant, consistent with this guidance. Primary air conditioning system replacement, repair, or installation is allowed only in homes where current occupants meet Louisiana’s WAP definition of “at-risk” AND climate conditions warrant. “System” can mean a central unit or multiple existing individually operating units; however, when a central unit is in place, it shall be considered the primary unit, and all other units are to be considered secondary. Use proper sizing protocols (Manual J, State Approved sizing protocols, NEAT/MHEA outputs, etc.) based on post-weatherization housing characteristics, and assess the mechanical ventilation when installing or replacing a heating or cooling appliance.

Procedure for unsafe or non-functioning secondary heating systems, including unvented secondary space heaters

Unsafe primary heating systems must be repaired, replaced and removed, or rendered inoperable, or deferral is required. Unsafe secondary heating systems, including space heaters, must be repaired, removed or rendered inoperable, or deferral is required. Replacement or installation of secondary heating systems is not allowed. Only unvented secondary space heaters systems that conform to the safety standards of ANSI Z21.11.2 may remain as back-up heat sources. When selecting items to leave behind, give preference to code-compliant heating systems that do not require electricity. Secondary unvented heating systems that do not meet ANSI Z21.11.2 must be removed and properly disposed of prior to weatherization. Repair of secondary unvented heating systems is not allowed. Secondary unvented heating systems that meet the ANSI Z21.11.2, but are not operating safely, must be removed and properly disposed of. See “Additional Health and Safety Guidance Related to Heating Systems WAP WPN 17-7 Attachment A”

<https://energy.gov/eere/wipo/downloads/wpn-17-7-weatherization-health-and-safety-guidance>

Definition of and documentation required for “at-risk” occupants

The **Hazard Identification Notification** form will be signed and issued to the client and documented in the unit file. Air conditioning system replacement, repair, or installation is allowed in homes of at-risk occupants (under 5 years of age, elderly, or documented medical condition) in Louisiana. Medical eligibility for an air conditioner is required for anyone under the age of 60. You must have written documentation from a third-party medical professional.

Testing protocols

Make sure primary systems are present, operable, and performing correctly. Check DOE-approved audit (NEAT/MHEA) to determine if the system can be installed as an energy conservation measure (ECM) with a SIR = > 1 prior to replacement as an H&S measure. Determine and document presence of “at-risk” current occupants when installing air-conditioning as a Health and Safety (H&S) measure. On combustion equipment, inspect chimney and flue and Appliance Zone (CAZ) depressurization, CO spillage, CO ambient and CO ppm. For solid fuel appliances look for visual evidence of soot on the walls, mantel or ceiling or creosote staining near the flue pipe. Treat vented gas- and liquid-fueled space heaters the same as furnaces in terms of combustion safety testing, repair and replacement. This policy applies to vented space heaters fueled by natural gas, propane, butane, or oil. Subgrantee Quality Control Inspector (QCI), auditors and inspectors are trained to document heating/cooling system testing. This curriculum includes repair, replacement options, and protocols for gas leak testing, CO levels, CO spillage, CAZ depressurization, proper venting, and combustion testing. Clients shall be provided all user manuals, preventative maintenance, health and safety notifications, CO education and energy conservation information on heating/cooling units, and information regarding the proper disposal of bulk fuel tanks, if applicable. See “Additional Health and Safety Guidance Related to Heating Systems WAP WPN 17-7 Attachment A”

<https://energy.gov/eere/wipo/downloads/wpn-17-7-weatherization-health-and-safety-guidance> .

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

Concurrence, Alternative or Deferral

Concurrence with DOE Guidance Alternative Guidance Results in Deferral/Referral

Unallowable Measure with DOE Funding Other Funding Source Addresses H&S Issue DOE LIHEAP

Asbestos on Heating, Ventilation and Air Conditioning (HVAC) systems, distribution, venting and other small surfaces that will be disturbed through the course of weatherization work policy

Inspect heating, ventilation and HVAC system piping and other small surface coverings for asbestos. Assume asbestos is present in suspect covering materials. When suspected friable ACM is present, take precautionary measures as if it is asbestos unless testing determines otherwise. Encapsulation by an appropriately trained asbestos control professional is allowed and should be conducted prior to blower door testing if the materials are friable. Charge only those costs directly associated with the testing and encapsulation to the H&S budget category. When deferral is necessary due to asbestos, occupant must provide documentation that a certified professional performed the remediation before work continues. Keep activities to a minimum in areas having damaged material that may contain asbestos. Document with signatures and inform the client regarding the damaged material and suspected asbestos. Do not further disturb the material. Do not dust, sweep, or vacuum debris that may contain asbestos. Never saw, sand, scrape, heat, burn or drill holes in asbestos materials. Do not track material that could contain asbestos through the unit. Follow EPA, DEQ, and OSHA regulations regarding the safe handling of asbestos to insure worker and client safety.

Asbestos in attics, walls, floors roofs and foundations that will be disturbed through the course of weatherization work policy

Minimal standards for remedy include but are not limited to the following: If the unit contains suspected ACMs in siding, walls, foundation or ceiling assume that this material is contaminated with asbestos and do not disturb it. Do not open any walls to check for vermiculite. Wear protective equipment when entering an attic area that may contains suspected ACMs. Do not track vermiculite insulation or associated dust into living spaces of the unit. Follow EPA, DEQ and OSHA regulations regarding the safety of workers handling asbestos to ensure worker and client safety. Do not dust, sweep, burn or vacuum debris that may contain asbestos. Never saw, sand, heat, scrape, or drill holes in asbestos materials. Subgrantees and contractors are trained to recognize and work safely when suspected asbestos-containing materials are present through a two-day Health and Safety course, asbestos videos, EPA's information for owners and managers of dwellings that contain asbestos and Louisiana's DEQ web site <http://deq.louisiana.gov/> and <https://www.deq.louisiana.gov/page/asbestos-accreditation-and-notification-forms>. Additional training will be handled on an ongoing and as-needed basis as identified by monitoring, new staff hires and request by Subrecipients, etc. The existence of asbestos siding that is in good condition does not prevent installing dense-pack insulation from the exterior. Siding in good condition may be removed and reinstalled in order to perform the ECM, and the associated costs may be charged as part of the ECM.

Vermiculite that will be disturbed through the course of weatherization work policy

When vermiculite is present, assume it contains asbestos unless testing determines otherwise. Do not perform a blower door test if it will disturb the vermiculite. Wear personal protective equipment when entering an attic area that may contains suspected ACMs. Do not track vermiculite insulation or associated dust into living spaces of the unit. Follow EPA, DEQ and OSHA regulations regarding the safety of workers handling asbestos to ensure worker and client safety. Encapsulation by an appropriately trained asbestos control professional is allowed. Removal is not allowed. When deferral is necessary due to asbestos, occupant must provide documentation that a certified professional performed the remediation before work continues.

Blower door testing policy when asbestos/vermiculite is present

If suspected friable ACM are present (easily crumbled, powdery, soft, or chalky), perform pressurization test instead of depressurization test where blower door tests are performed.

Testing protocols

Assess whether suspected ACMs are present. Asbestos Hazard Emergency Response Act (AHERA) sample collection and testing is allowed and must be conducted by a certified tester.

Documentation requirements

Provide pre-inspection client education to clients regarding the existence of suspected ACMs and provide client education advising non disturbance of such materials. Client education from the EPA web site on vermiculite insulation will be provided. Go to <http://www2.epa.gov/asbestos/protect-your-family-asbestos-contaminated-vermiculite-insulation>. Clients must sign the **Acknowledgement of Pre-Weatherization Client Education** form and document in the client file. Any testing results from suspected ACMs must be provide to the client and a copy kept in the client file.

6.3 – Biologicals and Unsanitary Conditions

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

Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance Alternative Guidance Results in Deferral/Referral

Unallowable Measure with DOE Funding Other Funding Source Addresses H&S Issue DOE LIHEAP

Biological and unsanitary conditions in dwellings policy

Remediation of conditions that may lead to or promote biological concerns and unsanitary conditions is allowed. Addressing bacteria and viruses is not an allowable cost. Deferral may be necessary in cases where a known agent is present in the home that may create a serious risk to occupants or weatherization workers. Also see Mold and Moisture guidance below. Cleanup of contaminants such as decomposing garbage and animal/human feces due to the occupant’s neglect is not eligible. Hazardous conditions must be corrected by a certified professional and signed clearance notification must be provided to the Subgrantee prior to weatherization continuing. Non-hazardous conditions can be corrected by the client, and if performed within 30 days, weatherization can continue.

Testing protocols

This health and safety category shall require sensory inspection and occupant questioning for the purpose of detection. The use of personal protective equipment shall be strictly enforced. Respirators, protective eyewear, and protective clothing will be worn when there is suspicion or knowledge that biological agents may be present in order to eliminate or minimize crew exposure. The inspection will be conducted by the Subgrantee representative provided that he/she is not exposed to hazardous biological contaminants (i.e., raw sewage, animal/human feces, infestation, decomposing garbage, and animal carcasses). Subgrantee Weatherization coordinators, assessors and final inspectors are trained with curriculum that includes how to recognize Biological and Unsanitary Conditions and when to defer as well as worker safety when coming in contact with these conditions.

6.4 – Building Structure and Roofing (e.g., roofing, wall, foundation)

Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance Alternative Guidance Results in Deferral/Referral

Unallowable Measure with DOE Funding Other Funding Source Addresses H&S Issue DOE LIHEAP

Structural issues in dwellings policy

While conducting the initial audit, the building structure shall be inspected for structural integrity. Structurally-compromised areas requiring more than incidental repairs shall be deemed beyond the scope of the WAP and shall be deferred.

Define and quantify minor or allowable structure and roofing issues. At what point are these considered beyond the scope of weatherization?

Minor repairs to protect or preserve the DOE materials installed may be performed to protect the energy saving investment. However, building rehabilitation is beyond the scope of the WAP. Examples of these minor allowable repairs include sealing minor roof leaks to preserve new attic insulation and repairing water-damaged flooring as part of replacing a water heater. Incidental structural repairs shall **not** include cosmetic applications, such as replacing a floor covering (i.e. carpet or linoleum). Only the structural part shall be replaced or repaired.

If priority lists are used and these repairs are designated as IRMs, at what point is a site-specific electronic energy audit required?

N/A

6.5 – Code Compliance

Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance Alternative Guidance Results in Deferral/Referral

Unallowable Measure with DOE Funding Other Funding Source Addresses H&S Issue DOE LIHEAP

Code compliance issues in dwellings policy

Correction of pre-existing code compliance issues is not an allowable cost other than where weatherization measures are being conducted. State and local (or jurisdiction having authority) codes and permits must be followed while installing weatherization measures. Condemned properties and properties where “red tagged” health and safety conditions exist that cannot be corrected under this guidance should be deferred. DOE and LIHEAP funds may be used when weatherization measures are being conducted or when necessary to perform weatherization work. They may not be used simply to correct pre-existing code compliance issues. The cost of complying with code requirements tied to installation of a specific measure will be charged as part of the measure, such as securing a permit to install a furnace. When work is not a direct component of the measure but still necessary to perform weatherization work, the costs must be charged to the H&S budget category. When correction of preexisting code compliance issues is triggered and paid for with WAP funds, cite specific code requirements with reference to the weatherization measure(s) that triggered the issue must be in the client/unit file. Follow State, Federal and local or AHJ codes while installing weatherization measures, including H&S measures.

6.6 – Combustion Gases

Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance Alternative Guidance Results in Deferral/Referral

Unallowable Measure with DOE Funding Other Funding Source Addresses H&S Issue DOE LIHEAP

Combustion gas issues discovered during testing, including those that require an immediate response policy

Immediate correction of combustion venting, excessive CO spillage, gas leaks and high ambient CO levels is allowed when testing indicates a problem. Inspect venting of combustion appliances and confirm adequate clearances and draft. Clearance from vent, such as "B" vent, should be maintained per vent manufacturer's specifications. Proper venting to the outside for combustion appliances, including gas dryers, is required.

Testing protocols

CO will be tested for in undiluted flue gases of combustion appliances under worse case CAZ (largest negative pressure). Furnace CO should not exceed 400 ppm air free measurements or service will be provided (unless CO measurements are within manufactured specifications). If CO exceeds 200 ppm air-free measurement in water heaters and room heaters, service will be provided to reduce CO to below these levels (unless CO measurements are within manufactured specifications). A clean and tune will be conducted if measured CO in the undiluted flue gases of the oven vent at steady state exceeds 225 ppm as measured (unless CO measurements are within manufactured specifications).

Combustion spillage will be tested for in undiluted flue gases of combustion appliances under worse case CAZ (largest negative pressure). If spillage in a combustion appliance with a warm vent (i.e. water heater) exceeds two minutes during pressure testing, specify measures to mitigate spillage. If spillage in a combustion appliance with a cold vent (i.e. unused heating system) exceeds five minutes during spillage testing, specify measures to mitigate. Test naturally drafting appliances for spillage and CO during CAZ depressurization testing pre- and post-weatherization and before leaving the home on any day when work has been done that could affect draft (i.e., tightening the home, adding exhaust). Inspect and test for gas or oil leakage at connections of natural gas, propane piping, or oil systems. If leaks are found, immediate action will be taken to notify occupant to help ensure leaks are repaired.

Emergency problems (e.g., ambient gas levels greater than 10% Lower Explosion Limit (LEL) and/or ambient CO levels that exceed 70 ppm) will be communicated clearly and immediately to the customer, the home shall be evacuated, and appropriate personnel (i.e. HVAC technician, utility, emergency services) shall be contacted.

Carbon monoxide (CO) alarms will be installed in each dwelling in accordance with ASHRAE 62.2 2016 and authority having local jurisdiction.

6.7 – Electrical

Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

Unallowable Measure with DOE Funding Other Funding Source Addresses H&S Issue DOE LIHEAP

Electrical hazards, including knob & tube wiring, in dwellings policy

Auditors will identify and inspect for electrical safety issues at assessment. Auditors will perform inspections and identify electrical hazards and non-code compliant issues. To determine if wiring is energized or live (old knob and tube), use Non-Contact electrical testing methods only. Additional voltage drop and voltage detection testing should be performed by a licensed electrician as necessary. Aluminum wiring should be thoroughly inspected before any insulation work is done.

Minor electrical repairs are allowed where health or safety of the occupant is at risk. Upgrades and repairs are allowed, when necessary, to install health and safety and/or energy conservation measures. Contact a licensed electrician for electrical upgrades and repairs and if obvious alterations/upgrades have been performed on the unit's electrical system.

Evaluate and, if necessary, provide sufficient over-current protection with magnetic circuit breakers, fuses and overcurrent relays.

If recommended by a licensed electrician and cost effective, wiring will be replaced with new appropriate wiring. Replacement must follow in accordance with the National Electrical Code (NEC) and local codes. Any replaced old wiring will be rendered inoperable and removed by a licensed electrician in accordance with the NEC and local codes.

When knob and tube wiring is present and active:

Proper clearance will be maintained (with a non-conductive dam) around energized wiring as required by the NEC or local authority having jurisdiction. The non-conductive dam will not cover the top of the wiring and will be created to separate the insulation from the live wiring with a minimum clearance of three inch (3") to combustibles.

Define and quantify minor electrical issues. At what point are these considered beyond the scope of weatherization?

When minor electrical repairs within the scope of the DOE WAP are required (moisture venting, GFCI receptacles, heating system, etc.) the typical standard of remedy shall be to sub-contract the repair work to a licensed electrician. All appropriate procurement and local permit procedures shall be followed when sub-contracting. Replacement of major electrical systems (i.e. main electrical panel, rewiring non code compliant attics, or electrical issues in units having multiple additions) is not allowed. If aluminum wiring is found to be active and in the areas to be insulated, no insulation should be added.

If priority lists are used and these repairs are designated as IRMs, at what point is a site-specific electronic energy audit required?

N/A

6.8 – Formaldehyde, Volatile Organic Compounds (VOCs), Flammable Liquids, and other Air Pollutants

Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance Alternative Guidance Results in Deferral/Referral
 Unallowable Measure with DOE Funding Other Funding Source Addresses H&S Issue DOE LIHEAP

Formaldehyde, VOCs, flammable liquids and other air pollutants in dwellings policy

Removal of pollutants is allowed and is 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 must be deferred. Suspected pollutants beyond small amounts of normal household cleaners must be removed from the envelope prior to weatherization. Permanent location of suspected pollutants should be considered in defining the envelope. ASHRAE 62.2 2016 addresses normal household conditions and does not account for high polluting sources. Subgrantees will consider additional ventilation in homes with suspected VOC problems that are not easily removed.

Testing protocols

Sensory inspection is part of the inspection process. Formaldehyde vapors are emitted by pressed wood products, hardwood, plywood, wall paneling, particleboard, wafer board, environmental tobacco smoke, durable press drapes, glues, some new carpets, urea-formaldehyde foam insulation, etc. VOCs are emitted by some household cleaning products like cleansers and disinfectants; paints, paint strippers, and other solvents; preservatives; stored fuels, and automotive products; moth repellents and air fresheners, etc. The U.S. Department of Labor’s Occupational Safety and Health Administration (OSHA) have standards for workplace exposures to formaldehyde. https://www.osha.gov/OshDoc/data_General_Facts/formaldehyde-factsheet.html

6.9 – Fuel Leaks *(please indicate specific fuel type if policy differs by type)*

Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance Alternative Guidance Results in Deferral/Referral
 Unallowable Measure

Fuel leak remediation protocols

When a minor gas leak is found on the utility side of service, the utility service must be contacted before work may proceed. Notify the utilities and the client and temporarily halt work when leaks are discovered that are the responsibility of the utility to address. Fuel leaks that are the responsibility of the client (vs. the utility) must be repaired before weatherizing a unit.

At what point are fuel leaks considered beyond the scope of weatherization?

Identify for repair or replacement any kinked, corroded or visibly worn flexible gas lines and any flexible connectors manufactured prior to 1974. Visible minor gas leaks in fitting and connectors can be repaired. Major gas leaks underground, in walls, and in confined spaces are considered beyond the scope of weatherization. For all natural gas, butane, and propane gas leak repairs, Subgrantees are required to use licensed, professional plumbing services that operate by city and parish local codes, permits and AHJ (authority having justification).

Testing protocols

Gas leaks will be detected through use of properly calibrated combustion gas detector, utility service information, sensory recognition or bubble test of piping system.

6.10 – Gas Range/Ovens

Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance Alternative Guidance Results in Deferral/Referral

Unallowable Measure with DOE Funding Other Funding Source Addresses H&S Issue DOE LIHEAP

Unsafe gas range/ovens policy

Gas cook stoves, ovens and other combustion appliances will be assessed for CO levels, venting, cleaning and proper operation as health and safety concerns. Repair work may include cleaning, minor repairs and venting under health and safety. Oven replacement is not allowed. Use ASHRAE 62.2 2016 standards for installed kitchen ventilation requirements. CO detection or warning equipment will be installed outside of each separate sleeping area in the immediate vicinity of the bedrooms in accordance with ASHRAE 62.2 2016 and authority having local jurisdiction.

Testing protocols

Gas ovens will be tested for CO levels. A clean and tune will be conducted if measured CO in the undiluted flue gases of the oven vent at steady state exceeds 225 ppm as measured (unless CO measurements are within manufactured specifications). Specify clean and tune if the flame has any discoloration, flame impingement, an irregular pattern, or if burners are visibly dirty, corroded, or bent on gas range burners.

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

Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance Alternative Guidance Results in Deferral/Referral

Unallowable Measure with DOE Funding Other Funding Source Addresses H&S Issue DOE LIHEAP

Hazardous materials disposal policy (existing material/appliance and hazardous material)

Follow OSHA Safety Data Sheet (SDS) guidelines for material disposal location requirements, environmental risks, appropriate Personal Protective Equipment (PPE) for working with hazardous waste materials and all state and local codes. Subgrantees and contractors must dispose of office and field equipment when obsolete in a responsible manner. Seek out parish and local government programs that recycle computer and electronic equipment containing hazardous components. Mercury Hazardous Waste Materials (old HVAC thermostats, CFL bulbs, etc.) generated in the course of weatherization work shall be disposed of according to all local laws, regulations and/or Federal guidelines, as applicable.

Documentation requirements

Provide pre-inspection client education to clients regarding the hazards associated with hazardous waste materials being generated/handled in the home. Clients must sign the **Acknowledgement of Pre-Weatherization Client Education** form and document in the client file. Any testing results or disposal documentation from hazards must be provide to the client and a copy kept in the client file.

6.12 – Injury Prevention of Occupants and Weatherization Workers
(e.g., repairing stairs and replacing handrails)

Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance Alternative Guidance Results in Deferral/Referral

Unallowable Measure with DOE Funding Other Funding Source Addresses H&S Issue DOE LIHEAP

Injury prevention measure(s) policy

Injury prevention related repairs are only allowable if minor in nature and when necessary to effectively weatherize a home. Minor repairs are only allowed so weatherization installers can access the area needed to safely complete authorized weatherization measures.

Define and quantify minor or allowable injury prevention measures. At what point are these considered beyond the scope of weatherization?

Photo and other documentation of existing condition of minor repair and LHC written approval are required in order to proceed if minor repair costs exceed \$300. Allowable injury prevention refers to minor installations needed to let workers safely access work areas or prevent injury (i.e. replacing a missing or unsafe stair tread on the stairs leading to attic or steps leading into unit or work areas). This would only be done if needed to effectively weatherize the unit.

6.13 – Lead Based Paint

Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance Alternative Guidance Results in Deferral/Referral
Unallowable Measure with DOE Funding Other Funding Source Addresses H&S Issue DOE LIHEAP

Lead safe work protocols

Crews must follow EPA's Lead, Renovation, Repair and Painting Program (RRP) 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 lead-based paint in the house would potentially create further health and safety hazards. Weatherization activities do not include lead abatement. Routine testing, before and after weatherization work, of dwelling for lead-based paint is not an allowable expenditure.

Only those costs directly associated with the testing and lead safe practices for surfaces directly disturbed during weatherization activities are allowable. Job site set up and cleaning verification by a Certified Renovator is required.

Weatherization deferral must occur if the following assessments are made:

1. The cost of LSW represents an excess amount (\$500 or more).
2. Subgrantee is not prepared to work with lead-based paint in terms of having proper training or liability insurance.

The issue of liability is one in which Subgrantees must pay close attention to, particularly if there is an exclusion clause in an Subgrantee's insurance policy that would not cover possible litigation for lead poisoning. Subgrantees are advised to have insurance that will provide coverage for LSW work in situations involving lead-based paint. The cost for this insurance is an allowable DOE expense and should be obtained at reasonable rates.

Testing protocols

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. Testing shall only be performed by a certified Lead Paint Inspector or Risk Assessor who is trained in sampling techniques.

Before incurring a testing expense consider the following:

1. Dwelling exact age is unknown - assume the presence of lead-based paint.
2. Dwelling built from 1978 on - may be assumed to be free of lead-based paint.
3. Dwelling built prior to 1940 - assume the presence of lead-based paint.

Documentation requirements

Lead assessment documentation is required in the unit file on ALL pre-1978 site built units weatherized and all units where dwelling exact age is unknown. All unit files, with lead identified and LSW performed on unit, must have the following documentation in the client file: Certified Renovator certification, any training provided on-site, description of specific actions taken, lead testing and assessment documentation, and photos of site and containment set up. Include the location of photos referenced if not in file. The EPA Lead Renovation Recordkeeping Checklist documentation is required on all completed units where lead safe weatherization is performed.

Follow pre-inspection client education provisions for RRP Lead safe work. Provide client education on dangers of Lead and have client signed confirmation of receiving EPA's Renovate Right pamphlet in the unit's file.

<https://www.epa.gov/lead/renovate-right-important-lead-hazard-information-families-child-care-providers-and-schools> .

6.14 – Mold and Moisture

(e.g., drainage, gutters, down spouts, extensions, flashing, sump pumps, dehumidifiers, landscape, vapor retarders, moisture barriers)

Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance Alternative Guidance Results in Deferral/Referral
Unallowable Measure Other Funding Source Addresses H&S Issue DOE LIHEAP

Moisture related issues in dwellings policy

Limited water damage repairs, moisture source control that can be addressed by weatherization workers, and correction of moisture and mold creating conditions are allowed when necessary in order to weatherize the home and to ensure the long term stability and durability of the WAP measures installed.

Define and quantify minor or allowable moisture-related measures. At what point are these considered beyond the scope of weatherization?

Source control is independent of hidden damage and related repairs. If visible mold growth is greater than 10 sq. ft., deferral is required. Mold cleanup is not an allowable H&S cost.

Surface preparation where weatherization measures are being installed (i.e. cleaning mold off window trim in order to apply caulk) are allowable moisture related measures and must be charged as part of the ECM, not to the H&S budget category. ASHRAE 62.2 2016 will be used to address moisture related issues with adequate whole house and spot ventilation on completed units.

6.15 – Pests

Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance Alternative Guidance Results in Deferral/Referral
Unallowable Measure with DOE Funding Other Funding Source Addresses H&S Issue DOE LIHEAP

Pests and pest intrusion prevention policy

Infestation of pests may be cause for deferral where it cannot be reasonably removed or poses health and safety concern for workers. Screening of windows and points of access and incorporating pest exclusion into air sealing practices to prevent intrusion is allowed.

Define and quantify pest infestation thresholds. At what point are these considered Beyond the scope of weatherization

Assess the presence and degree of infestation, associated risks, removal, pest management, and need for remediation. The infestation threshold is if the infestation condition cannot be remediated in a single treatment, and deferral is recommended. If a building is infested with rats, roaches, or other vermin, Subgrantee should defer weatherization until the condition is corrected.

6.16 – Radon

Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance Alternative Guidance Results in Deferral/Referral

Unallowable Measure with DOE Funding Other Funding Source Addresses H&S Issue DOE LIHEAP

Procedure for radon in dwellings

Radon mitigation is not an allowable H&S cost. Louisiana does not have any high radon potential areas. See map of Radon Zones for Louisiana: <https://www.epa.gov/sites/production/files/2014-08/documents/louisiana.pdf>.

Testing protocols

Testing is allowed in areas with high radon potential. Louisiana has no areas listed in the high radon potential areas.

Documentation requirements

Clients must sign the **Radon Informed Consent Form** prior to receiving weatherization services. This form must be kept in the client file. The consent form includes information from the results of the IAQ Study that there is a small risk of increasing radon levels when building tightness is improved.

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

Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance Alternative Guidance Results in Deferral/Referral

Unallowable Measure with DOE Funding Other Funding Source Addresses H&S Issue DOE LIHEAP

Installation or replacement policy for the following safety devices:

Smoke Alarms: Installation of smoke detectors is allowed where detectors are not present or are inoperable. Replacement of operable smoke detectors is not an allowable cost. In all units weatherized at least one operational smoke detector is installed per level, if the smoke detector is not present or operational. Batteries are installed to make existing smoke detectors operational when necessary. Smoke detectors are installed by the Subgrantee/Contractor and not left with the client. Properly disposal of detectors following local code and state compliance. Smoke detectors are installed per manufacturer's instructions and local AHJ.

Carbon Monoxide Alarms: Installation of CO detectors is allowed where CO detectors are not present or are inoperable. Replacement of operable CO detectors is not an allowable cost. In all units weatherized at least one operational CO detector is installed per level, if the CO detector is not present or operational. Batteries are installed to make existing CO detectors operational when necessary. CO detectors are installed by the Subgrantee/Contractor and not left with the client. Properly disposal of CO detectors following local code and state compliance. CO detectors are installed per manufacturer's instructions and local AHJ.

Fire Extinguishers: A fire extinguisher may be provided in units whose primary heat source is solid fuel (wood, coal, wood pellets, grains, etc.). The fire extinguisher must be installed according to manufacturer's standards and local code in vicinity of the primary heating source.

Testing protocols

Check existing alarms/detectors for operation by following manufacture guides for installation and testing of detectors installed.

6.18 – Ventilation and Indoor Air Quality

Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

Version of American Society of Heating Refrigeration and Air-conditioning Engineers (ASHRAE) 62.2 Implemented (optional: identify Addenda used)

ASHRAE 62.2 2016

Procedures for complying with implemented ASHRAE standard

Conduct ASHRAE 62.2 2016 evaluation, measure fan flows rate, and estimate costs needed to meet ASHRAE 62.2 2016 compliance. Install ASHRAE compliant fans only for ventilation necessary to meet the ASHRAE 62.2 2016 standards. Use whatever is greater for ASHRAE calculations: the bedrooms plus one or number of occupants. ASHRAE 62.2 2016 will be used to address moisture related issues with adequate whole house and spot ventilation on completed units. Subgrantees will utilize ASHRAE 62.2 2016 calculation sheet found at: <http://www.residentialenergydynamics.com/REDCalcFree/Tools/ASHRAE6222016> .

Testing protocols

Accurate CFM measurements and unit data are requirements, along with performing follow-up testing to ensure compliance. Make CFM adjustments as needed to meet the ASHRAE standard. Post weatherization blower door numbers can be assumed to calculate required CFM, but ventilation must be adjusted and documented in the unit file once final blower door numbers are performed. Take action to prevent zonal pressure differences greater than 3 Pascal across the closed interior door (if one exists), when replacing existing or upgrading whole house ventilation fans.

6.19 – Window Repair, Door Repair

Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

Unallowable Measure with DOE Funding Other Funding Source Addresses H&S Issue DOE LIHEAP

Window repair and door repair H&S policy

Window or door replacement is not an allowable H&S cost.

Window or door repairs as H&S measure would be used to resolve visible obvious H&S issues, such as bulk water intrusion issues causing visible biological growth on a unit. Written documentation and photos of H&S issue being addressed is required in the file.

When working on windows and doors follow LSW requirements for pre-1978 units and all units where exact building age is undetermined.

6.20 – Worker Safety (e.g., OSHA)

Concurrence, Alternative or Deferral/Referral

Concurrence with DOE Guidance

Alternative Guidance

Results in Deferral/Referral

Unallowable Measure with DOE Funding Other Funding Source Addresses H&S Issue DOE LIHEAP

Federal, state and local worker safety requirements policy

Workers must follow OSHA standards where required and take precautions to ensure the H&S of themselves, clients, and other workers. All Subgrantees and contractors must maintain compliance with the current OSHA Hazard Communication Standard <https://www.osha.gov/Publications/OSHA3514.html>, including on-site organized Safety Data Sheets (SDS).

Subgrantees must follow the local authority having jurisdiction that may require a licensed professional to perform certain tasks. Reference SDS, SWS, and OSHA regulations for PPE equipment and protective measures if contaminants or other hazards are present. Evaluate work spaces with limited ingress and egress with restricted work areas to be considered confined spaces. Ensure workers are aware of risk during extreme weather, including the symptoms of heat stroke and heat exhaustion. Work site should be secured to prevent unauthorized entry.

SDS, RRP Lead, local agencies health and safety plan, ASHRAE documentation and proper personal protection equipment (PPE) must be organized and available on all job sites.



**Weatherization Assistance Program (WAP)
Hazard Identification Notification**

Inspection Date: _____ **Inspector:** _____

Building ID: _____ **Subgrantee:** _____

Applicant Name: _____ **Notification Date:** _____

Address: _____

Lessor/Owner Name & Address (if applicable): _____

Recently your home was inspected for weatherization services. It is the policy of this Subgrantee to provide weatherization services when those services may be delivered effectively and safely, without undue hazards to our staff or our clients. Health and Safety problems and or conditions were noted on _____(date). Those conditions are checked below:

- Standing water, mold, friable asbestos, deteriorated lead-based paint surfaces or other hazardous materials, this cannot be addressed by the weatherization work.
- Evidence of infestations of rodents, insects, and/or other vermin.
- Un-vented space heater(s) that may have a harmful effect on the air quality of the home.
- Unsecured pets that may prevent workers from safely completing their work.
- The presence of sewage or animal feces in the home.
- Improperly stored chemicals, combustible materials, or other fire hazards that present a danger to the occupants or the workers.
- Maintenance or housekeeping practices that limit the access of workers to the dwelling or create an unhealthy work environment.
- Major remodeling is in progress, which limits the proper completion of major weatherization measures.
- Preexisting code compliance issues, combustion safety, mold, moisture.
- Electrical or plumbing hazards or structural failures that cannot be addressed as a part of weatherization services.
- Threat(s) of violence or abusive behavior to worker(s) or household member(s) during the weatherization process.
- The illegal presence or use of any controlled substance in the home during the weatherization process.
- Occupant has known health conditions that prohibit the installation of insulation or other weatherization materials.
- Other: _____

LA WAP: Hazard Identification Notification

Weatherization may be reconsidered, if you are able to meet the conditions listed below by:
_____ (date).

(List specific steps which must be taken below)

- 1.
- 2.
- 3.
- 4.
- 5.
- 6.

When you have met the conditions listed above, or if you believe a mistake has been made in this determination, or would like to appeal the decision, please contact the party listed below, and we will re-inspect your home within ____ working days of hearing from you.

Subgrantee Contact: _____

Contact Title: _____

Phone: _____

Email: _____

To assure that you have received this notice it has been sent to you by certified mail or hand delivered to you for signature. The signature on the receipt verifies your receipt of this notice.

_____	_____	_____
Applicant Signed Name	Applicant Printed Name	Date Signed
_____	_____	_____
Lessor/Owner Signed Name	Lessor/Owner Printed Name	Date Signed

Please note your eligibility for weatherization services lapses on _____ (date).

If you have not re-contacted us by _____ (date), your application will be denied.

Instructions for completing the form:

Regardless of whether weatherization services are performed or not, auditors will provide the client with a written list of found health and safety concerns, with a copy inserted into the client file, using the form **Hazard Identification Notification** resources for specific safety issue corrections whenever possible. Potential referral resources include but may not be limited to:

- Childhood Lead Poisoning Prevention Program
- Lead Hazard Control
- Maternal and Child Health home visiting programs
- Housing and Urban Development
- City or Town welfare
- Rural Economic Development
- Landlords/homeowners
- Any other such sources known by Community Action Programs to be available

The evaluation is in no way intended to be a code compliance inspection and should not be construed as such. The form will also indicate repairs the client/owner is responsible for correcting prior to weatherization, if applicable. The client will also be informed that corrective action of all items is recommended and that it is the client's responsibility to do so.

Health and safety problems found during the health and safety assessment will result in a Subgrantee taking one of four actions:

1. If the problem(s) will not prevent the dwelling from being weatherized and installing the weatherization measures will not exacerbate the problem, the Subgrantee can proceed with weatherization.
2. If the problem(s) must be remedied before or during weatherization, the corrective action is allowable under this guidance, and the cost is reasonable as defined earlier in this document, weatherization can proceed; the health and safety issues must be corrected prior to job completion.
3. If the problem(s) must be remedied before weatherization measures can be installed, and the corrective action is not allowable under this guidance or the cost is not reasonable, then correction of the health and safety issue becomes the client/owner's responsibility. The Subgrantee must defer weatherization, until the issue can be corrected.

When deferral is necessary due to H&S problems, occupant may be required to provide documentation that a certified professional performed the remediation before work continues. The Subgrantee must also refer the client/owner to any known resource(s) that may be able to help correct the problem.

Regardless of which option is chosen, the Subgrantee must notify the client of all found Health and Safety issues on the Hazard Identification Notification form. It is very important for the Subgrantee to document any found health and safety problems and/or any problems or conditions that could potentially result in health and safety problems. Documentation must include photos. Careful and complete documentation can protect the Subgrantee from future client claims regarding the results of weatherization.