

What’s New?

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General WPN Updates

- [WPN 22-7](#) consolidates and clarifies all previous Health and Safety (H&S) guidance into more specific topics and specifically points to the location of related items such as the deferral policy in the Annual Master File.
- WPN 22-7 reinforces the requirement that all H&S expenditures are documented in each client file with the specific reason, cost, and funding source and clarifies that client education materials and H&S related training are not allowable H&S expenses but are Training and Technical Assistance budget items.
- WPN 22-7 clarifies the required contents of the Occupant Pre-existing or Potential Health Condition Screening, Hazard Identification Notification, and Radon Informed Consent Form.
- WPN 22-7 incorporates reference to the [Buildings Assessment of Radon Reduction Interventions with Energy retrofits Expansion Study \(The BEX Study\)](#) and its recommendations for associated “precautionary measure” installations.
- WPN 22-7 clarifies that there are “required”, “allowable”, and “prohibited” H&S activities and integrated this clearly into the Table of Issues.
- WPN 22-7 clarifies the terms that must be defined by the Grantee anywhere they exist in the Grantee’s H&S Plan (i.e., “minor”, “major”, “limited”, “at-risk”, and “case-by-case”).
- WPN 22-7 clarifies the requirement that all “Required Testing/Inspection” related items must be documented in each client file.

Table of Issues Updates

General

- Structure of the Table of Issues is updated to reflect the categorization of actions as “required”, “allowable”, or “prohibited” with DOE WAP H&S funds.
- Removes requirement to detail H&S activities carried out with non-DOE WAP funds except for “required” activities.
- Removes all training activities from the H&S guidance to reduce redundancy with the training and technical assistance plan requirements of the annual Master File. All H&S related training is to be detailed in the Grantee Master File, Section V.8.4 Training and Technical Assistance of the annual application or as a separate document attached to the SF-424 with a reference to such attachment in section V.8.4.
- Reduces client education to only those items that are “required”.
- Reduces the Table of Issues contents by consolidation and removing any redundancy.
- Eliminates Attachment A of WPN 17-7 by incorporation into the Table of Issues in the appropriate locations.

Issue Specific

Air-Conditioning, Heating Systems, and Combustion Appliances

- Clearly defines Primary and Secondary heat sources.
- Incorporates all guidance from Attachment A of WPN 17-7 into a single document.
- Incorporates previous unvented space heater guidance into this section and clarifies that no unvented combustion appliances may remain, even as secondary units, in manufactured homes
- Reinforces requirements for safety inspections of solid-fuel appliances (e.g., woodstoves).
- Requires that all homes must have a safe, operable, primary heating system for the entire dwelling unit after weatherization is complete.
- Requires documentation that demonstrates all heating and cooling system replacements were cost tested as ECM prior to using H&S funds for installation.
- Clarifies the specific testing requirements for all combustion appliances (depressurization, spillage, and Carbon Monoxide)
- Strengthens inspection and testing procedures for solid fuel appliances (i.e., woodstoves and fireplaces) including requirement that Grantees have specific testing policies and action levels.
- Combines the “Combustion Gases” section from the 17-7 Table of Issues with this section.

Asbestos – Confirmed and/or Presumed Asbestos Containing Material

- Combines all previous asbestos related activities into a single category and consolidated guidance requirements.

Biologicals and Unsanitary Conditions

- Adds allowance for “limited” cleaning of the workspace to protect the health and safety of workers and occupants as defined in the Grantee’s H&S Plan.

Building Structure and Roofing

- N/A

Code Compliance

- N/A

Electrical

- N/A

Fuel Leaks

- Clarifies allowable and prohibited activities relating to bulk fuel tank leaks.

Gas Ovens/Stovetops/Ranges

- N/A

Hazardous Materials

- Combines the “Formaldehyde, Volatile Organic Compounds (VOCs), Flammable Liquids and other Air Pollutants” from the 17-7 Table of Issues with this section.
- Clarifies that “limited” removal of hazardous materials for the protection of workers is “required” but is “allowable” for protection of occupants.

Injury Prevention of Occupants

- Removes the injury prevention of workers from this section and moved those requirements to the “Worker Safety” section of the 22-7 Table of Issues.

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

- Clarifies that lead can exist in other forms than just “paint”.
- Clarifies that DOE WAP H&S funds may not be used for lead abatement or for the purchase, resourcing, or maintenance of X-ray Fluorescence (XRF) devices

Mold and Moisture

- Incorporates the “Window and Door Replacement, Window Guards” section from the 17-7 Table of Issues.
- Clarifies that window and door **repairs** are allowable H&S expenses to resolve a bulk water intrusion issue that is the cause of visible biological growth and in compliance with the most current program notice ([WPN 19-5](#) at the time of this guidance).
- Clarifies that using DOE WAP H&S funds for window and door **replacements** and/or mold cleanup is prohibited.

Occupant Pre-existing or Potential Health Conditions

- Allows for occupant temporary relocation costs on a “case-by-case” basis.
 - Grantee must define the allowable costs, relocations options, procedure for this case-by-case determination, and what documentation is required from the client if DOE WAP funds are used for this purpose.
- Clarifies that screening of occupant health conditions is documented using the “Occupant Pre-existing or Potential Health Condition Screening Form” required by WPN 22-7.

Pests

- N/A

Radon

- Based on the [BEX report](#) requires that every home receive the following package of measures if applicable, regardless of radon zone where located:
 - Cover exposed dirt floors within the pressure/thermal boundary with a sealed soil gas retarder
 - Cover sump well/pits with airtight covers
 - Implement ventilation as required by ASHRAE 62.2-2016
- Provides an updated sample template for the occupant’s informed consent which includes the required information and updated references.

Safety Devices: Smoke and Carbon Monoxide Alarms, Fire Extinguishers

- Clarifies requirements for the installation of CO alarms in every home regardless of location or fuel sources.
- Allows for replacement of functional smoke and CO alarms that are past the manufacturer's stated lifetime (usually 10 years), or the batteries of those that are operational but need replacement batteries.

Ventilation and Indoor Air Quality

- Reinforces the requirement for deferral if client refuses ventilation installation as required by ASHRAE 62.2-2016.

Water Heaters (*see Combustion Appliances for combustion related requirements*)

- Adds this new section to the Table of Issues to specifically address H&S issues frequently reported by WAP Grantees.

Worker Safety

- Reinforces the requirements to adhere to all federal, state, and local worker safety regulations (e.g., OSHA, EPA) which may include the following allowable expenses:
 - Minor repairs and installations (e.g., repairing stairs, replacing handrails, etc.) as defined by the Grantee’s H&S Plan, are allowable when necessary to safely weatherize the dwelling.
 - Equipment purchases to protect the health and safety of the worker (e.g., Personal Protective Equipment (PPE), jobsite cleaning supplies)
 - Environmental and surveillance testing required by OSHA regulation.
- Moves training requirements from H&S plan to the Grantee T&TA plan.