

# PRACTICAL MOLD & IAQ COMPLAINT MANAGEMENT PROCESS

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**SPELL JIF**  
School Pool for Excess Liability Limits

# Initial Complaint

- Golden Rule: take every complaint seriously
- Mold and IAQ complaints can spiral out of control quickly
- Prevention and early intervention are the keys to minimizing losses
- Do not allow personal perceptions to influence sound investigation practices

# Identify Complaint Initiator

- Most complaints start with one person and will grow to include others
- Identify who is involved early in the process
- Listen carefully to the complaint and speak directly to the complaint initiator to get a first-hand account, otherwise you'll gather hearsay
- If more than one person is affected, interview each person, separately, to get their account.

# Develop a Response Plan

- Respond quickly to all complaints
- Do not respond haphazardly
- Be uniform and consistent
- Be professional
- Identify the “Complaint Team” and incorporate them into your communications (be open)
- Initiate a team response, if warranted
- Involve key personnel such as Business Administrator, Principal, Facilities Manager, HVAC technician and School Nurse

# Complaint Process

- Initiate the investigation
- Interview complaining parties
- Document each phase of the process
- Identify the potential problem/s
- Define all possible remedies
- Implement possible solutions
- Communicate your findings and remediation procedures to all interested parties
- Monitor effectiveness of solution efforts going forward

# Complaint Investigation

- Ask pertinent questions of the complaint team
- Define the parameters of the complaint such as:
  - The nature of the issue;
  - When the issue started;
  - Where the person is being affected;
  - How the person is being affected (symptoms);
  - Severity of the symptoms;
  - Specific times of day symptoms manifest;
  - Do the symptoms subside at any time;
  - Have there been recent changes in the environment (seasonal, construction, new cleaning products, etc.)

# Complaint Investigation

- Ask if any other staff are affected
- If a teacher, ask if any students have complained or exhibited similar symptoms
- Talk to the school nurse to see if any staff or students have complained of similar issues in the building
- Ask the nurse if any students with asthma or other respiratory issues have had increased health issues while in school and acutely during the involved time frame
- Speak with facility staff to see if there were any recent changes or maintenance to the HVAC system, new cleaning products or chemicals introduced, or if any new construction work is being done.

# Resolving the Complaint

- Work with your Response Team to identify possible contributing factors
- Inspect affected areas including walls, ceilings, above ceiling tiles, closets, cabinets, drains, sinks, under furniture
- If possible, use a snake cam to inspect wall cavities
- Inspect surrounding areas such as exterior, halls and adjacent rooms

# HVAC Involvement

- Many IAQ issues are directly related to the HVAC system
- Ensure the system is functioning as designed
- Inspect all the components of the system including piping, coils, drip pans, vents, ducts etc.
- Inspect air intakes and diffusers to ensure they are not blocked
- Inspect areas around fresh air intakes for possible contamination sources

# Narrow the Focus

- Gather as much information as possible
- Meet with the Mold/IAQ Response Team to discuss the findings
- If the problem is obvious, identify the solution
- If the problem is not obvious, try to narrow the possible sources
- Once solutions have been identified and prioritized, initiate the remediation plan

# Document Efforts

- Each step in the process should be documented
- Identify findings, possible causes and possible solutions
- Document why certain steps were taken, while others may have been disregarded
- Use your solution efforts to continuously narrow the focus and refine your remedies
- Try to reach a final conclusion

# Closing the Complaint

- Have the team review all the efforts and evaluate the effectiveness of the remedies
- Communicate those findings to the affected parties:
  - The problem was "A" and "A" was fixed and seems to have solved the issue.
  - We could not find a single source of the problem so we did "A", "B" and "C" and will monitor those efforts moving forward
  - We could not find the source of the problem and will be calling in a professional to help
  - After a thorough investigation, we could not find any problems related to the initial complaint

# IAQ/Mold Critical Monitoring

- Seasonal IAQ Calendar
  - Before and After School Breaks
  - Heating and Cooling Seasons
  - Flu Season
  - Cold/Dry Weather
  - Spring – High pollen and mold spores
  - Lawn Mowing and fertilizer
  - Fumigants
  - Polishes

# IAQ/Mold Critical Monitoring

- Monitor critical areas:
  - Room inspections (Dust Buildup, Proper Chemical Storage)
  - HVAC maintenance
  - Temperature/humidity monitoring
  - Renovation controls including roof tear-offs, material storage, chemical use, new carpet/furniture
  - Air intakes
    - Cars/Buses Idling
    - Storage of Garbage

# Train Your Team

- Train and empower your front line staff
- Custodians are intimately familiar with their buildings and are in most areas daily
- Provide them with the basic knowledge on what information is critical to gather:
  - Hot, humid weather;
  - Feeling of stuffiness in room;
  - Damp feeling in room and visible condensate;
  - Signs of active water intrusion;
  - Signs of visible mold and where to look

# Train Your Team

- Train front line staff to take basic temperature and relative humidity (RH) readings
- Proper Housekeeping (dust control)
  - High humidity and excessive dust can lead to surface mold growth
  - Textbook storage
- Develop periodic inspection schedule for personnel to inspect critical areas of the school for signs of visible mold including ceiling tiles, walls, near windows, under cabinets/sinks, under desks and shelves, compressed paper such as books, etc.
- Provide basic response equipment such as a temperature/RH gauge and powerful flashlight

# Train Your Team

- Hazard Communication (HazCom)
  - Proper Chemical Storage and Use
    - Science Classrooms
    - Vocational Shops
    - Cleaning and Maintenance Products
  - Maintaining Safety Data Sheets (SDS) of all chemicals (including chemicals from outside contractors)
  - Train staff on chemical leak response
- Have designated safety person who will manage all IAQ/Mold complaints

# First Responders

- Ensure your front line staff understands the importance of reporting any anomalies to their supervisor, no matter how minor
- The Facilities Manager should review all reports to determine a response action
- This may include further investigation, additional testing, HVAC evaluation, repairs and cleanup.

# Air Testing

- You may be pressured early in the process to “call someone to do air testing”
- While there are times when air testing may be prudent, it is not usually necessary on most complaints
- Testing just to test is a “feel-good” response that may not reveal any useful information
- Air testing should be considered when trying to narrow the focus of an investigation and prove/disprove a possible theory

# Air Testing

- Air testing can be useful to identify possible problems with HVAC systems
- The focus of the testing should be defined and include reference areas outside the affected area, such as outdoors and hallways near the room. An environmental consultant can help narrow the test focus
- All involved parties must clearly understand there are no regulations regarding acceptable levels of mold

# Professionals

- Most complaints will not rise to the level of involving professional help
- Unusual or complex problems may necessitate reaching out to professionals at varying levels of expertise
- The use of professionals should be based on a thorough evaluation of the situation by the Mold/IAQ response team
- Calling in professionals may require input from administrators including the Superintendent and School Business Administrator
- Do not allow others to influence how you implement professional assistance. Be consistent.

# Other Assistance

- The JIF Safety Director can provide support to assist you with properly responding to your issue
- You may find the need to involve other professionals on more complex issues such as your local environmental consultant, HVAC mechanical company, architects, engineers and a Certified Industrial Hygienist
- If the complaint involves possible staff or student injury, you should contact Qual-Lynx to submit the necessary reports

# Reporting to Claims

- If an employee is potentially exposed and complains of health issues, it should be reported to Qual-Lynx as a potential WC issue.
- If students or 3<sup>rd</sup> party complaints arise, it should be reported to Qual-Lynx as a potential GL claim and **must be reported to the Pollution Liability Carrier**

# Summary

- Be proactive. Develop a response plan and assign a Designated Safety Person.
- Identify key complaint team members.
- Treat every complaint seriously.
- Document every step of the process.
- Train and use your front line staff to identify problems early.
- Communicate with all affected personnel.
- Use all available resources to make your job easier.