


## Save the Date – ICAA Webinar on E-Verify FEB. 25 @ 1:00 PM EASTERN

### Everything You Need to Know about E-Verify

This ICAA webinar provides a practical overview of the federal E-Verify program and its application to insulation contractors. Attendees will learn how E-Verify works alongside the Form I-9 process, what employers can and cannot do when using the system, and how to properly respond to tentative non-confirmations. The program also addresses common compliance questions, multi-location hiring issues, and the specific E-Verify requirements imposed on federal contractors and subcontractors under the President’s Executive Order. The session is designed to help contractors understand their obligations, avoid common pitfalls, and maintain compliance with federal employment verification laws. 



## MAKE YOUR VOICE HEARD IN WASHINGTON D.C.




**Curt Rich**  
President and CEO, North American  
Insulation Manufacturers  
Association

**G**overnment policy has an oversized impact on the insulation industry. Regulations and incentives shape our markets, government standards affect our workplaces and workforce, and federal decisions influence whether our industry grows or stalls. As the saying goes, if you’re not at the table, you’re on the menu.

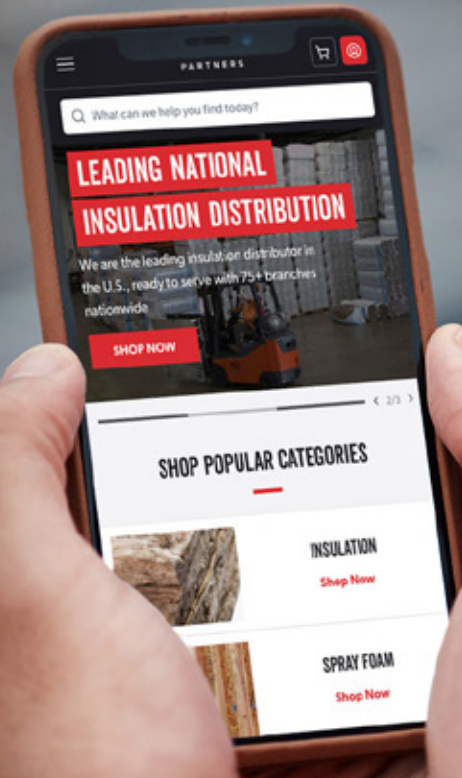
When our industry shows up and tells our story, we win. Lawmakers who understand the comfort, energy-saving, and economic benefits of insulation — and who see the thousands of manufacturers and contractors operating in their states — are far more likely to support policies that move our industry forward. But that doesn’t happen on its own. It happens because we take the time to make our case.

Right now, our voice is needed more than ever. We need federal policies that reignite residential new construction and give homeowners the tools and incentives to make their existing homes more energy efficient. Those policies won’t write themselves. They sure won’t reflect our priorities unless we engage.

That’s why on **Wednesday, May 13, 2026**, member companies of the North American Insulation Manufacturers Association and the Insulation Contractors Association of America will come together in Washington, D.C. We’ll spend the day walking the halls of Congress, meeting directly with lawmakers, and advocating for smart, pro-insulation policies that strengthen our industry.

Formal registration for our Washington, D.C. Lobby Day will open soon. For now, mark your calendar and plan to participate. Grab a seat at the table and help shape the next generation of federal policies that protect our industry and grow our markets. 

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# I'm Back ... and I'm Grateful

**Todd Sawyer, ICAA President**  
**Insulpro | A Division of The Built Companies**  
**Email: todd@insulate.org**

Dear ICAA Members,

For those of you who don't know me, my name is Todd Sawyer, and I am honored to once again serve as your ICAA President.

I grew up in the insulation business. My father, Larry Sawyer, founded Eastern Insulation in 1974. I started in the warehouse at the age of 10 and spent summers through high school and college installing insulation in the field. In 1994, I went to work full time, learning every aspect of the trade and the business. In 2001, I purchased the company from my father and went on to build Eastern Contractor Services into a large, highly successful operation across New Jersey, Pennsylvania, and Texas.

ICAA played a pivotal role in that journey. I was invited to join the ICAA Board at a young age and had the privilege of serving as President in 2014. After selling my business in 2015, I continued building companies, expanding my lumber yard, developing luxury homes, and investing in and operating a GMC dealership (which I still own today). Each experience sharpened my perspective as an operator, a leader, and a steward of people and capital.

In 2023, I returned to the insulation industry by launching INSULPRO, which quickly merged with Rockstar Drywall and United Door & Trim to form Built Interiors. Upon reentering the industry, I rejoined ICAA and expressed my interest in serving again. I am deeply grateful for the opportunity to help lead this Association now that I'm a little older, a little wiser, and more committed than ever. Some of my closest friendships have come directly from ICAA, and I can say without hesitation that this Association was instrumental in my success.

There is no industry quite like ours: the support ICAA Members give to one another; the commitment our suppliers and manufacturers

show to us; the camaraderie, accountability, and shared pride in doing things the right way. Now that I'm back, may I share some ideas I've learned along this journey? You'll find them in the sidebar box.

I am proud to be back, proud to serve. And I am incredibly optimistic about the future of this industry and this Association.

Let's do the work – together.

Respectfully,

Todd Sawyer, President, ICAA 


## Lessons Learned

- ◆ **Know Your Craft; Know Your Numbers.** This is not a “fake it till you make it” industry. Know your building science. Know your numbers. Run your business to make money. Profit is not a dirty word: it is what enables stability, growth, opportunity, and longevity.
- ◆ **Respect Is Non-Negotiable.** Respect your staff. Respect your customers. Respect your vendors. Perhaps most importantly, respect yourselves. Life is too short to be miserable. None of us knows how much time we have. Do meaningful work, build real relationships, and enjoy the journey.
- ◆ **To the Next Generations.** To the second- and third-generation leaders—and to the young men and women entering this industry: do the work; play the long game. There is no such thing as overnight success. No tricks, no shortcuts, no magic. Ignore the “get rich quick” noise and social-media nonsense. Daily discipline always wins.
- ◆ **Daily Discipline Wins.** Practice the 3 E's: exercise – energy creates momentum; education – stay sharp, stay dangerous; envision – see the outcome before it exists.

*continued on page 4*

## Lessons Learned

continued from page 3

- ◆ **Planning Is Not Optional.** Have a plan - and execute it. Plan your month, your week, and your day. Work the plan daily. Revise when needed. Stay on course.
- ◆ **Demand Excellence from Yourself First.** Hold yourself accountable. Don't let yourself off the hook. Stay disciplined when no one is watching—or when it isn't "your" fault.
- ◆ **People Do Business with People.** Customers need to like you, to trust you. Customers need to trust your company. Confidence wins. Cockiness loses. Be assured, not arrogant. Let results speak. Earn respect through consistency. Ask better questions. Listen more than you talk.
- ◆ **Winning Is a Team Sport.** Ask for help - from coworkers, managers, and ownership. Invest in training, education, personal development, and planning.
- ◆ **Profit Is Not Optional.** Financial success is everyone's responsibility. Every project must make money. Profit is not greed: it is security, growth, and opportunity. Operational discipline equals financial health. Material waste hits margins directly. Labor inefficiency compounds quickly. Theft steals from all of us.
- ◆ **Extreme Ownership.** For those who are not owners—act like you are. Ask yourself daily, would I: accept this waste if I owned the business, allow this if it were my money, ignore this if my name were on the door? Extreme ownership means no excuses, no finger-pointing, no blame-shifting. You own everything in your world. Success is your responsibility. Failure is your responsibility even when it's not "your" fault. Excuses are cancer: they spread fast and kill performance. Ownership builds trust - inside the company and outside it. People trust leaders who own mistakes. Customers trust partners who don't deflect. Teams rally behind accountability. 

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# Competent, Qualified, and Authorized Persons: Three Different OSHA Definitions

Brian Coté | Installed Building Products Spray Foam Manager | Chair, ICAA Spray Foam Task Force



*I am sure my father never thought of me as a competent person. He sometimes might have been ok with the thought of me being qualified to be stupid or authorized to be a pain in his backside.*

Growing up in Vermont country was fun: working on the farm and playing with kids nearby all made for a great childhood. Among the several farms in the area, we had enough kids on any given evening to field two full soccer or baseball teams. Sometimes when we were really bored, we'd let our imagination run and dream up new things to do. Once we placed an old milk can on its side and ran a wooden plank over the top (about a 14" lift). Building up speed we then rode our bikes up the plank to fly over the milk can. This quickly became too easy, so we stood the milk can up and repositioned the plank (about a 3' lift). I was the first to run my new 5-speed stingray bike down the hill at full speed and jump this new configuration, surely impressing the girls with my ability to defy danger. Well, one or two full back flips later, I'd landed fifteen feet away on my back. As my vision came back, the kids crowded around to see if I was still alive. I vaguely identified my brother in the group and in a low gravelly voice made my victory statement... "Get Mom!" Hence my first paragraph above.

Should OSHA ever visit your jobsite, there is a good chance they may ask who is the Competent, the Qualified, or the Authorized person with respect to workplace safety for your company. This can be confusing as you might feel they are the same thing; in fact, they all mean a different thing. So, let us look at each to help you understand their differences.

## OSHA defines Competent, Qualified, and Authorized persons as below:

**Competent Person** (1926.32(f)) means one who can identify existing and predictable hazards in the surroundings, or working conditions which

are unsanitary, hazardous, or dangerous to employees, and who also has authorization to take prompt corrective measures to eliminate the hazards or stop the work if immediate corrective actions cannot be made.

**Qualified Person** (1926.32(m)) means one who, by possession of a recognized degree, certificate, or professional standing, or who by extensive knowledge, training, and experience, has successfully demonstrated their ability to solve or resolve problems relating to the subject matter, the work, or the project.

**Authorized Person** (1926.32(d)) means a person approved or assigned by the employer to perform a specific type of duty or duties in a restricted-access location or locations at the jobsite.

So, what does this mean? Let's look at an example where your crew must use fall protection at a particular jobsite.

A *Competent Person*, typically a more senior employee at the jobsite, is always assessing the work environment, identifying and promptly correcting immediate (and potential) hazards. They also have the authority to stop work should the work environment become unsafe beyond immediate correction. This requires skill, experience, and the power to act: job supervisors or foremen are typically *Competent Persons* responsible for inspecting anchor points and harnesses and enforcing your company's fall protection protocol.

- ▶ **Example:** your job foreman examines the anchor points at the jobsite and determines they are inadequate for your company's fall-protection harnesses and lifelines. Furthermore, there is no acceptable work-around providing alternate anchor points, so they do not allow work to continue in the affected area.

A *Qualified Person*, typically a more senior employee in the company, possesses advanced knowledge and credentials (degree, certificate, or extensive training or engineering experience)

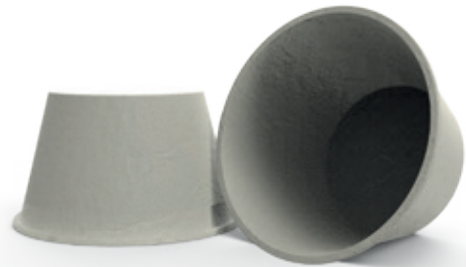
*continued on page 7*



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## Competent, Qualified, and Authorized Persons: Three Different OSHA Definitions

continued from page 5

to exercise specialized judgement when the work environment is unsafe beyond typical immediate corrections.

- ▶ **Example:** a *Qualified Person* is the individual who can reliably identify, verify, and implement suitable and safe anchoring that will work under current jobsite conditions with your fall protection equipment.

An *Authorized Person*, typically a more junior employee at the jobsite, is one who has been trained and assigned to safely and competently perform specific tasks in potentially hazardous work areas. They may only enter the area to work after the Competent Person has inspected it and declared it safe for work. An *Authorized Person* has no authority to recognize and correct hazards as part of their job description.

- ▶ **Example:** your laborers who have been trained and certified in your fall protection program are *Authorized Persons* to properly affix, don, and utilize the equipment in your company's fall protection program when the work environment requires fall protection be utilized to get the job done.


### Can one person hold all three jobs?

Yes. (And no.)

A Competent Person typically has risen through the ranks and long served as an Authorized Person before ever becoming certified as a Competent Person. To remain a Competent Person, they also must hold current certification in using the safety equipment their job crew (Authorized Persons) must use. If your Competent Person also has additional, specialized credentialing (such as design engineering), they may also be a Qualified Person. This is a rare case where one person can actively serve in all three categories.

A Qualified Person may have started their career out in the field as an Authorized person using safety equipment, even perhaps advancing to a Competent Person, but at some point left the field to do more specialized work, gaining the education and credentials to do so, and have not maintained their training and certification as Authorized or Competent Persons. At this point in their career, they are only a Qualified Person.

A seasoned laborer, long certified as an Authorized Person, may have over the years acquired, through experience, the knowledge to both recognize a hazardous work environment and know how to correct it, but (and this is important!) they do not have the authority to take corrective action: it is crucial that they immediately notify the Competent Person on the jobsite of the impending danger.

Douglas S. Jenks' article, "Unpreventable Employee Misconduct," (see page 9) details the importance of having a robust Safety Program, routinely documenting your employees' training and demonstrating their knowledge through testing. 

### IN A NUTSHELL

#### COMPETENT PERSON

- ◆ **Role:** identifies existing and potential hazards and takes corrective action to prevent them, stopping all work until a hazard has been eliminated.
- ◆ **Requirements:** this person typically is a more senior employee, long practiced and certified in using required safety equipment, now trained and certified beyond that to be able to inspect and verify safety equipment is in good working order and the work environment is free of hazards.
- ◆ **Example:** the job foreman examines the anchor points at the jobsite and determines they are inadequate for your company's fall-protection harnesses and lifelines and stops work in that area until the hazard is mitigated.

#### QUALIFIED PERSON

- ◆ **Role:** solves one-off, non-routine work-related problems, designing systems and solutions.
- ◆ **Requirements:** this person may or may not have experience working in the field, but would have obtained a degree, certificate, or have proven extensive knowledge, training, and experience.
- ◆ **Example:** the Project Manager is called on site to reliably identify, verify, and implement suitable and safe anchoring that will work under current jobsite conditions with your fall protection equipment. Once the correct anchoring is securely in place, work may resume in that area.

#### AUTHORIZED PERSON

- ◆ **Role:** properly utilizes specialized safety equipment.
- ◆ **Requirements:** this person typically is a more junior employee, trained and certified to competently and safely don personal protective equipment when the work environment demands its use.
- ◆ **Example:** the helper who properly dons his fall protection harness and properly affixes lifelines to identified anchor points.

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# Unpreventable Employee Misconduct Defense



**Douglas S. Jenks, Esq.**  
Auman, Mahan + Furry,  
Attorneys

When OSHA cites an employer for violating the OSHA standards, it presumes that the employer *must have done something wrong*. But employers know that is not always true. It's not always the employer's fault. Sometimes one employee's isolated misconduct

can undermine an employer's entire safety program. Fortunately, there is a well established legal defense that recognizes this reality: the Unpreventable Employee Misconduct Defense.

## What Is the Unpreventable Employee Misconduct Defense?

The Unpreventable Employee Misconduct Defense, or simply the "Misconduct Defense," embodies the age-old proverb that *you can bring a horse to water, but you can't make it drink*. That is, sometimes employees do not follow the employer's excellent safety program despite the employer's best efforts. The Misconduct Defense allows an employer to appropriately avoid liability for an OSHA violation under such circumstances.

But OSHA will not simply take an employer's word for it. To succeed with the defense, the employer must prove that it did everything reasonably possible to prevent the violation. This defense requires good record keeping, comprehensive and frequent safety training, and consistent safety enforcement.

## Asserting the Defense

To successfully assert the Misconduct Defense, the employer must first have well established safety rules designed to prevent the violation.

This means the employer's safety program must include clear, specific rules addressing the hazards at issue. For example, if a citation involves fall protection, the employer must show that it had a fall protection safety program that complied with OSHA standards. Vague or generic safety statements will not cut it: OSHA wants to see safety rules that match the actual work performed.

The employer must also show that it communicates that safety program through training. Employers cannot do too much safety training. Employers should provide safety training, followed by some additional safety training, and then conclude with even more safety training. Get the point?

To prove this part of the defense, employers must document their training and testing thoroughly. Keep copies of any training materials and always require the attendees to sign dated sign-in sheets.

This is important because sometimes employees forget (or flat-out deny) participating in the training. Inexplicably, when OSHA interviews employees as part of an inspection, employees frequently deny having any safety training despite having gone through training regarding the very hazard at issue.

The employees might answer incorrectly because they are nervous. Or maybe because they didn't understand the training. Therefore, it is best to include quizzes or tests (and some hands-on activity) to reinforce the training. Employees who do not understand training have not been adequately trained. It also goes without saying that the employer must conduct the training in a language the employees understand.

The employer must also show OSHA that it made reasonable efforts to enforce its safety training. That is, the employer should conduct regular and frequent jobsite safety inspections. Designate individuals, whether supervisors, foremen, or safety personnel, to conduct jobsite safety audits. Ideally, these individuals should drop all other responsibilities for some finite amount of time and simply inspect the job site for safety concerns. Do this multiple times per day.

This is true even if the employer sends a small crew to a job. For example, imagine an employer sends out a two-person crew for a one-day insulation job. At the start of the job, and then periodically throughout the day, one of the crew members should stop insulating, and conduct a brief but real safety assessment. Ask (and document) whether there are any hazards present, how those hazards are mitigated, and whether there have been any changes in conditions that create new hazards.

*continued on page 12*

# Moisture Meters: A Vital Tool for SPF Pros



**Mason Knowles**  
SPF Industry Consultant

**M**oisture is the enemy of SPF applications. Most SPF applicators know that the substrate SPF is applied to needs to be sufficiently dry. This not only includes surface moisture, but also moisture within the substrate materials. According to SPF industry's best practices and

manufacturers' recommendations, wood should have less than 18% moisture content. Other materials should be dry enough to prevent moisture contamination during application. Best practices recommend recording moisture content in daily logs before work begins in addition to climate data (ambient temperature, humidity, dewpoint etc.).

The easiest and fastest way to measure a substrate's moisture content is by using a moisture meter. There are 2 types of moisture meters.

**1. Pin-type moisture meters** (conductance) have two metal probes that physically penetrate the wood's surface in order to take a moisture reading. (See picture, below.) When the meter is turned on, an electrical current flows from one pin to the other pin and the resistance is measured. Depending on the material, the number displayed is either qualitative (% moisture content) or a relative number that can be used for subsequent comparative wet/dry readings. Many pin-type moisture meters have probe extensions with insulated pins except at the tip, that are helpful for insulation as they can measure up 4-6 inches deep into a material.



*Pin-type moisture meter,  
Delmhorst BDX-20*

**2. Pinless moisture meters** (capacitance) use electromagnetic signals or capacitance to record substrates' moisture levels. These are


used on finished material such as painted surfaces, finished drywall, wallpaper, etc. to avoid puncturing holes in the material. They work best on smooth surfaces and most can record moisture up to ¾" in depth.

I prefer a pin meter such as the Delmhorst BDX-20 (pictured below): it is easier to obtain moisture readings in corners and edges compared to capacitance meters that are hard to fit in those areas. Plus, you can use the extensions to obtain readings deeper into materials such as insulation and concrete.

## How to use the pin moisture meter.

1. Check the meter's calibration. The Delmhorst has a built-in calibration check. Just follow the directions, push a button, and the correct number should show on the screen. If the meter is out of calibration, it is likely caused by low batteries. If after changing the batteries it is still out of tolerance, it can be sent back to Delmhorst to recalibrate.
2. Set it to the correct material or to the 0-100 reference scale for relative, wet/dry indications of moisture. For example, wood settings read up to 40% moisture content, and drywall up to 6%. A user-selectable alarm set point can be turned on to alert you to a desired threshold. Again, follow the directions for your unit.
3. Measure moisture in multiple spots: corners, edges, flat surfaces, including both high and low areas. Moisture can hide in tight corners, and it is hard to detect it visually.
4. Wipe off surface moisture that may interfere with a correct reading if using non-insulated pins like the ones on top of the meter. Push the pin or probes as deep as possible. For some materials such as concrete, if possible, use nails inserted into holes made with a drill to penetrate deep into the material to obtain more reliable readings.

## How much do moisture meters cost?

Expect to pay from \$500 and up for a professional and reliable moisture meter: it's a small price to pay to verify and ensure you don't have moisture problems during application. 

# Radiant Barriers: How to Navigate Code Confusion & Install with Confidence



**Pablo Sobrado**  
Engineering Manager, Prodex  
Technical Committee Chairman,  
RIMA International

## The “Generalist” Dilemma

For many insulation contractors, radiant barriers are a complementary product line rather than a core business. However, whether you install 1,000 square feet or 100,000, the professional liability remains the same.

Recently, contractors in Texas faced a common

point of confusion: The International Energy Conservation Code (IECC) listed radiant barriers as a “permissible” option, yet the City of Austin mandated them as “compulsory” for new residential construction. Who is right?

The answer lies in understanding the **Hierarchy of Authority**.

## The Golden Rule: The AHJ is King

In the United States, building codes are a pyramid. The model codes (IECC/IRC) are at the bottom—they are suggestions until adopted. The State code is in the middle. At the top is the Authority Having Jurisdiction (AHJ)—your local city or county inspector.

If the City of Austin adopts a stricter amendment than the state of Texas or the IECC, the City wins. Every time.

## The 4-Step Due Diligence Protocol

To avoid failed inspections and rework, RIMA International, the trade association representing manufacturers and distributors of reflective insulation, radiant barriers, and interior radiation control coatings recommends this simple 4-step protocol before bidding on any project involving radiant barriers:

### Step 1: Verify the Climate Zone

Verify the IECC Climate Zone for the project. Radiant barriers are most effective and typically encouraged in Climate Zones 1-3 (Hot/Humid and Hot/Dry). In cooler zones, they may not be required by code but can still be used as part of

a hybrid system if installed correctly to avoid moisture trapping.

### Step 2: Contact the AHJ (The Five-Minute Insurance)


Never assume the state code is the final word. A quick call to the local building department can save thousands of dollars. Ask specifically: “Does this municipality have local amendments regarding radiant barriers?”

### Step 3: Read and Understand Material Standards (ASTM C1313 and C1224)

Code officials look for conformance with ASTM standards. Using unverified “generic foil” is the fastest way to fail an inspection.

- **For Sheet Products (Foil):** Ensure the material meets ASTM C1313/C1313M (*Standard Specification for Sheet Radiant Barriers for Building Construction Applications*). This standard ensures the foil won’t tear during installation, won’t corrode, and meets flame spread requirements (ASTM E84).
- **For Systems (Bubble/Foam Core):** Verify compliance with ASTM C1224 (*Standard Specification for Reflective Insulation for Building Applications*).

### Step 4: Follow Installation Standards (ASTM C1149 and ASTM C1743)

A radiant barrier only works if it faces an air space. RIMA recommends following ASTM Standard Practices for Installation. Ensure that there will be a dust-free surface that is required for long-term performance. 

#### References & Resources:

DOE Building Energy Codes Program: [energycodes.gov](http://energycodes.gov)  
DSIRE (Incentives Database): [dsireusa.org](http://dsireusa.org)  
ASTM International: [astm.org](http://astm.org) (Search for C1313 and C1224)

**LINK TO STATES’ SUMMARY  
ON RADIANT BARRIER STATUS**

<https://bit.ly/4qUe9ip>



## Unpreventable Employee Misconduct Defense

continued from page 9

Finally, to assert the Misconduct Defense, the employer must enforce its safety program through progressive discipline. If employees routinely violate rules without consequences, OSHA will conclude that the employer tolerates unsafe behavior and the defense will fail.

OSHA will want proof that the employer enforces the safety program and may ask for documentation of all recent safety infractions. Employers who are unable to cough up copies of documented safety infractions will have a tough time using the Misconduct Defense.


A strong progressive discipline policy typically includes verbal warnings, written warnings, suspension, and then finally termination. Generally, it is best practice to reset the progression annually. Employers can reserve the right to advance the progressive discipline as needed and even terminate immediately for particularly atrocious infractions. It might be a good idea to use a rolling annual lookback. So even though the employer wipes the slate clean on January 1, that employer may

## COMPONENTS OF UNPREVENTABLE EMPLOYEE MISCONDUCT DEFENSE

1. Employer was not aware of violation.
2. Have safety program/rule prohibiting conduct observed, which was violation of OSHA standard.
3. Communicate (train) employees in rule.
4. Program to enforce safety rules and safety program.
5. Enforce program.
6. For supervisors – show higher standard.

consider that employee's longer discipline history when considering next disciplinary steps.


## Conclusion

The Unpreventable Employee Misconduct Defense provides employers with a meaningful path to defend against OSHA citations when a violation truly results from isolated employee behavior. In today's enforcement climate, insulation contractors who invest in strong, enforceable safety programs not only protect their employees, but also protect the company when one employee's lapse threatens to undermine everything they have done right. 

## REGULATORY REMINDER: POSTING OSHA FORM 300A

If you have not posted your OSHA Form 300A, do it now! It should be posted in your facility from February 1 through April 30. Fines could be up to \$16,550 if you do not post.

**What is OSHA Form 300A?** OSHA Form 300A, filled out after the year has ended, is a summary of the work-related injuries and illnesses an employer recorded during the previous year on OSHA's Form 300 Log. Each line item on the employer's 300 Log has a corresponding OSHA Form 301 Injury and Illness Incident Report filled out, detailing the event. (If the employer had three recordable incidents on the log, there should be three corresponding Forms 301, one for each incident on the log.)

Contact ICAA for more information. 



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