



ODOC Weatherization Program Notice 19-8

COVID-19 Program Update for ODOC Weatherization Programs

To: All ODOC Agency Weatherization Program Service Providers - Executive Directors, Weatherization Program Managers

From: Amanda Marcott-Thottunkal, Senior Energy Programs Manager

Regulations: [2 CFR § 200.431 - Compensation - fringe benefits](#); [CAA Manual Requirement 310](#)

Purpose: To provide an update to weatherization Subgrantees regarding program requirements for Department of Energy Weatherization Assistance Program 2019 and Oklahoma Department of Human Services Low Income Housing and Energy Assistance Program 2019 during the COVID – 19 outbreak.

Implementation Date: Effective immediately from March 17, 2020. **Please note that the COVID-19 situation is rapidly developing. If additional guidance is needed, or our Federal partners issue different or supplemental guidance, ODOC will release updated guidance as quickly as possible.**

REGULATORY BACKGROUND:

On March 15, 2020, the Office of the Oklahoma Governor issued an [Executive Order](#) declaring a state emergency as [COVID-19](#) continues to be a public health threat in the state.

PROGRAM GUIDANCE

1. As per CAA Manual Requirement 301 - Deferrals, "it is possible that unique conditions will arise that are not specifically outlined here." This ODOC WPN 19-8 is adding a new possible deferral reason to the list. In order to mitigate the spread of COVID -19, especially to the vulnerable populations that our weatherization network serves, any Subgrantee, if they wish, can defer any home, at any point in the production completion process. A home may be deferred at the request of the client or the Subgrantee's. Although ODOC is not requiring homes to be deferred, ODOC does encourage it until the COVID-19 outbreak is mitigated, as determined by the CDC and the Oklahoma Department of Health. Each Subgrantee's board and executive director must make appropriate decisions for the health and safety of their clients and employees.
2. ODOC is postponing all outstanding Quality Assurance monitoring until further notice.

4. In the event a program or a Subgrantees agency shuts down due to a state disaster, as per 2 CFR 200.431 (b), Federal funds (such as DHS LIHEAP or DOE WAP) may be used to pay employees, provided the Subgrantee already has board approved personnel policies in place to guide these decisions; the costs are equitably allocated to all related activities; and the organization uses a consistent accounting basis for costing each type of leave.
5. Although Federal funds may be used to pay leave, the DOE WAP requirements regarding H&S and ACPU remain in effect. As of the date of this guidance, there is no waiver to these requirements from DOE. No Subgrantee has ODOC permission to exceed the DOE ACPU of \$7,541 for PY2019.
6. For DHS LIHEAP 2019, ODOC is modifying the ACPU requirement. **At this time, ODOC is approving an ACPU of \$9,500 for all Subgrantees for DHS LIHEAP 2019. ODOC hopes this helps all Subgrantees absorb any extra labor cost that may be needed during this challenging time.**
7. Helpful Resources:
 - CAPLAW's [brief](#) – Managing Coronavirus Risks: What Should the Community Action Network Think About?
 - Centers for Disease Control – [Implementation of Mitigation Strategies for Communities with Local COVID-19 Transmission](#)
 - HUD - <https://www.hud.gov/coronavirus>
 - Oklahoma Department of Health - <https://coronavirus.health.ok.gov/>
8. Any questions regarding this ODOC WPN should be sent to the Senior Energy Programs Manager – Amanda.Marcott-Thottunkal@okcommerce.gov.