

# Memorandum

DATE: May 26, 2020

WAP Memorandum 062

REPLY TO

ATTN OF:  Erica Burrin, Weatherization Assistance Program, Program Manager  
Weatherization and Intergovernmental Program Office

SUBJECT: Weatherization Assistance Program's Response to Guidelines for Opening Up America Again – Phase One & Frequently Asked Questions (FAQs)

TO: Weatherization Assistance Program Grantees, Weatherization Assistance Program Subgrantees

PURPOSE: To assist Grantees and Subgrantees with Phase One activities as they pertain to the Weatherization Assistance Program (WAP) and consistent with the Guidelines for Opening Up America Again.

On April 16, 2020, President Donald J. Trump issued the Guidelines for Opening Up America Again<sup>1</sup> (Guidelines), a three-phased approach based on the advice of public health experts. These steps will help state and local officials when reopening their economies, getting people back to work, and continuing to protect American lives.

The Guidelines propose a phased approach:

- Based on up-to-date data and readiness;
- Mitigates risk of resurgence;
- Protects the most vulnerable;
- Implementable on statewide or county-by-county basis at governors' discretion.

In anticipation that all Grantees will be moving to Phase One at different times, and to lessen health and safety risks for our Weatherization Assistance Program (WAP) workers and clients as the WAP workforce returns to work, the Department of Energy (DOE) recommends Grantees and Subgrantees refer to the following organization websites for updated recommendations:

- **Center for Disease Control and Prevention<sup>2</sup> (CDC)**
- **Environmental Protection Agency<sup>3</sup> (EPA)**
- **U.S. Department of Labor Occupational Safety and Health Administration<sup>4</sup> (OSHA)**

<sup>1</sup> <https://www.whitehouse.gov/openingamerica/>

<sup>2</sup> <https://www.cdc.gov/>

<sup>3</sup> <https://www.epa.gov/>

<sup>4</sup> <https://www.osha.gov/>

DOE encourages Grantees to update their Health and Safety Plan, if they have not done so already, to include Infectious Disease Preparedness and Response. Refer to “Guidance on Preparing Workplaces for COVID-19<sup>5</sup>” issued by OSHA, as well as “Considerations for Field Work<sup>6</sup>” compiled as a resource by the National Association for State Community Services Programs (NASCSPP) for ideas on how to develop this plan.

*NOTE: Specific instructions from Federal, state, local, tribal, and/or territorial health agencies, should be followed and incorporated into workplace-specific plans.*

DOE will continue responding to Frequently Asked Questions (FAQs). Information contained in this Memorandum can also be found online at:

<https://www.energy.gov/eere/wap/downloads/message-grantees-about-wap-questions-related-covid-19>.

### ***Phase One<sup>7</sup>***

During Phase One, and in some cases Phase Two, Grantees should continue to encourage working from home to the maximum extent possible. Many WAP administrative and management related tasks, such as client intake and questionnaires, procurement of personal protective equipment (PPE) and other safety materials, development of Infectious Disease Preparedness and Response policies and procedures, initial energy audit inputs (conducted with satellite mapping programs) and employee training opportunities (e.g. trainings on new safety procedures, training on proper use of PPE) can be done remotely. Electronic media is encouraged, when available and possible (e.g., phone interviews, signatures, photos of furnace plates, online training, etc.). At Phase One, personnel should:

- Avoid groups of more than 10 people in circumstances that do not readily allow for appropriate physical distancing (e.g., receptions, trade shows).
  - ACTION: Participate in virtual training conferences and events if more than 10 people are involved.
- Minimize non-essential travel and adhere to CDC guidelines regarding isolation following travel.
  - ACTION: Plan to attend onsite training and/or meetings and conferences no sooner than Phase Three.

The following are aspects that are WAP-specific in nature for Grantee consideration.

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<sup>5</sup> <https://www.osha.gov/Publications/OSHA3990.pdf>

<sup>6</sup> <https://nascsp.org/wp-content/uploads/2020/04/COVID-Considerations-for-Fieldwork.pdf>

<sup>7</sup> <https://www.whitehouse.gov/openingamerica/#phase-one>

## *Responsible Weatherization Intake*

Phase One continues to promote social distancing and teleworking. During this time, promoting WAP, client outreach activities, and application processing are all possible.

- Many Weatherization promotion and client outreach activities can continue to occur as staff work remotely. Electronic processes can be implemented online to process applications and collect client signatures.
  - ACTION: States and local organizations should develop a plan and protocol for collecting applications remotely, if possible, and in instances where remote applications are not plausible, identify and implement strict distancing protocols.
  - ACTION: Conduct Weatherization program intake and eligibility determination, including client signing application verifying accuracy of information. When applicable, in some states where the Low Income Home Energy Assistance Program (LIHEAP) application is used, provide approval to share utility data with other programs to minimize client exposure and maximize client services.
  - ACTION: Prior to sending workers to a home, per Weatherization Program Notice (WPN) 17-7, Weatherization Health and Safety Guidelines, Table of Issues, Occupant Pre-existing or Potential Health Conditions<sup>8</sup>, Subgrantees are required to screen occupants to review known or suspected health concerns. For operational WAP agencies, the health and safety of local crew and contractors depends on screening this information during the COVID-19 pandemic, and clients who are not feeling well or who have contracted COVID-19 could be put on a deferred waitlist. Several questions to consider when screening clients via telephone (instead of traveling to any client dwelling) include:
    1. *Has anyone in the household tested positive or are presumed positive for COVID-19? If so, have they met the CDC criteria to be around others per the section [“When it’s safe to be around others: ending home isolation?”](#)<sup>9</sup>*
    2. *Has anyone in your household experienced fever, cough or shortness of breath in the last two weeks?*
    3. *Has anyone in your household been in contact with someone who has had a fever, cough or shortness of breath in the last two weeks?*
    4. *Does anyone in the household have underlying medical conditions or are they in frequent contact with someone who has underlying medical conditions?*

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<sup>8</sup> <https://www.energy.gov/eere/wap/downloads/wpn-17-7-weatherization-health-and-safety-guidance>

<sup>9</sup> <https://www.cdc.gov/coronavirus/2019-ncov/if-you-are-sick/steps-when-sick.html>

## ***Responsible Weatherization Scheduling and Installation Protocols***

In units where energy audits and work orders are complete, Grantees are advised to work with Subgrantees to develop a safe installation process – collecting signatures by mail and/or electronically (clients unable to sign documents electronically online may send photo signatures via USPS mail, text or email), limiting the number of workers in a unit at one time, relocating clients temporarily if they have a place to go to, and other processes as determined by the Grantee.

In accordance with OSHA Standard 3990, PPE whether provided by the Subgrantee or the individual's own gear, must be worn by weatherization crew members. DOE recommends that PPE be offered to weatherization clients, if feasible. Suggested items to include on all work trucks include, but are not limited to, respirators, N95 face masks, gloves, protective clothing (e.g., Tyvek), booties, paper towels, hand sanitizer, cleaners, client education materials, and client face masks.

- All vulnerable individuals should continue to shelter in place. Per the [White House's Guidelines for Opening Up America Again](#) Appendix, vulnerable individuals are defined as:
  1. Elderly individuals.
  2. Individuals with serious underlying health conditions, including high blood pressure, chronic lung disease, diabetes, obesity, asthma, and those whose immune system is compromised such as by chemotherapy for cancer and other conditions requiring such therapy.
- ACTION: Place eligible vulnerable clients on a waitlist, giving them priority once the state or local jurisdiction is implementing Phase Three of the Guidelines.
- ACTION: Consider the following recommendations, which outline changes that Grantees may want to incorporate into Infectious Disease Preparedness and Response policies and procedures.
  - Equip all field workers with PPE and provide training for proper and safe use, removal, and cleaning to avoid contamination (and cross-contamination) for self and others. Examples of PPE include gloves, goggles, face shields and masks, and N95 filtering respirators.
  - Provide the necessary supplies to maintain clean surfaces in client homes both before and after they are performing work. See the EPA's Guidance for Cleaning and Disinfecting Public Spaces, Workplaces, Businesses, Schools, and Homes.
  - Ensure all vehicles and crew members are equipped with hand sanitizer containing at least 60% alcohol.
  - Prioritize the completion of all exterior work prior to addressing the interior work in the client home. Remember to practice social distancing.

- Reduce the number of crew and clients simultaneously in the home at the time of interior work. Consider asking clients if they would leave the home during the interior work or try to isolate them to one room.
- Establish a policy that crews conducting interior work will wear PPE. This may also help assure clients who are fearful of people entering their home.
- Offer face masks to clients to contain respiratory secretions.
- Install a physical barrier, such as a clear sheet of plastic, or zip wall, to isolate a client while interior work is being conducted.
- Limit contact by allowing one driver per vehicle per day, disinfecting the driver's controls after use.
- Implement a protocol where if workers arrive at a site and determine a client is exhibiting respiratory illness, allow the client to move to a waitlist for a period to ensure worker safety.

### ***Responsible State and Local Monitoring Visits & Final Inspections***

- WAP organizations should limit the number of visits to a client home to the extent needed to complete the unit.
  - ACTION: Grantees and Subgrantees should consider the development of work flow processes that combine contractor/crew inspection home visits with the contractor/crew final workday and/or Quality Control Inspection (QCI) to limit the number of visits to the home. In addition this new process could be developed to include client sign off on the inspection report indicating they are satisfied with work once work in homes resumes.
  - ACTION: Grantees should modify existing monitoring protocols to ensure they can safely work in local organization offices and client homes to evaluate the local agency's safety protocols and client satisfaction. Consider scheduling all monitoring to occur once the state has entered Phase Three.

## Frequently Asked Questions (FAQs)

### *Weatherization Administration and Production*

- When stay at home mandates are lifted, what is the Grantee's responsibility to provide guidance to return to work, aside from providing basic work safe practices, PPE, client agreements for work on homes, etc.?
  - ACTION: Grantees and Subgrantees should follow guidance issued by state and local jurisdictions when implementing a plan to get back to work, as well as by Federal health agencies such as the CDC and OSHA.
- Can local organizations accept verbal signature from clients who do not have the appropriate technology to do electronic signature but are afraid to allow someone into their home?
  - ACTION: Agencies may accept signatures received via mail or electronically. Clients unable to sign documents electronically online may send a photo of physical signatures via text or email or be provided the option to mail a paper copy of the application with signature.
- If a local WAP organization wants to update its technology (e.g. computers, software, video session capabilities), can they charge it to training and technical assistance funds?
  - ACTION: Grantees interested in exploring options should contact their respective Project Officer. The 2020 Application Instructions, which were issued with [Weatherization Program Notice 20-1, Program Year 2020 Weatherization Grant Application](#), “T&TA funds shall not be used to purchase vehicles or equipment for Subgrantees to perform Weatherization services. The cost of these vehicles or equipment to support the Program must be charged to the Vehicle/Equipment or Program Operations categories.”
- In regard to combining the 2019-2020 State Plan, are Grantees required to now have another virtual hearing for the combined plan?
  - ACTION: All sections of the Annual File must be revised, as necessary, to reflect the revised Budget for the combined 2019 and 2020 funding allocations, and to reflect Program Year (PY) 2020 requirements, which includes evidence of the required Public Hearing for the PY 2020 funds. Proof of one PY 2020 Public Hearing is required, including a written transcript. Although an additional Public Hearing is not required, Grantees are encouraged to communicate any revisions to their Subgrantee network.

- We did not combine program years and due to the extended production pause we now have concerns about ACPU for PY 2020. Can we extend the 2020 grant period beyond March 31, 2021 (for April 1<sup>st</sup> Grantees) or June 30, 2021 (for July 1<sup>st</sup> Grantees)?
  - ACTION: DOE will handle these requests on a case-by-case basis. Grantees should contact their respective Project Officer.
  
- How does DOE suggest Grantees modify health and safety plans in response to COVID-19? Will any changes be made to WPN 17-7?
  
- ACTION: DOE encourages Grantees to update their Health and Safety Plan, if they have not done so already, to include Infectious Disease Preparedness and Response. Refer to Guidance on Preparing Workplaces for COVID-19 issued by OSHA. How is DOE directing Grantees and Subgrantees related to worker safety and exposure to COVID-19?
  - ACTION: DOE defers to OSHA standards and directives and other related information that may apply to worker exposure to novel coronavirus, COVID-19, located on this site: <https://www.osha.gov/SLTC/covid-19/standards.html>.
  
- State and local agencies are developing safety protocols in response to COVID-19 and in preparation for returning to field work. Should safety protocols apply consistently to all households, or can we develop additional protocols for vulnerable households (e.g., elderly, underlying medical conditions)?
  - ACTION: DOE recommends following thorough safety protocols, as recommended by the CDC and OSHA, with a consistent approach to all households.
  
- Can DOE clarify the types of PPE required for WAP work? At a minimum what is the recommended list of PPE WAP workers should have available? Is the N95 construction-grade mask appropriate for the install crews when they are inside the home? If we are unable to get N95 masks, can we use KN95 masks? CDC makes allowances for alternative PPE. Are these allowable for WAP?
  - ACTION: DOE recommends organizations follow the guidance set forth by FEMA on use of PPE for non-healthcare workers. <https://www.fema.gov/news-release/2020/04/22/coronavirus-covid-19-pandemic-addressing-ppe-needs-non-healthcare-setting>
  - ACTION: DOE reminds Grantees and Subgrantees to continue following applicable OSHA standards and WPN 17-7 for proper use of PPE during weatherization work.

## *Weatherization Eligibility*

- Through unemployment, with federal stimulus funds, individuals are receiving an additional \$600 per week along with their regular unemployment benefit. Do these funds count as income or are they exclusive?
  - ACTION: DOE recommends reviewing [Weatherization Program Notice 20-3, Poverty Income Guidelines and Definition of Income](#). Unemployment benefits are included in the definition of income. Specifically, the Definition of Income states Cash Receipts include “Regular payments from social security, railroad retirement, unemployment compensation, strike benefits from union funds, worker's compensation, veteran's payments, training stipends, alimony, and military family allotments.”
- The government distributed stimulus checks to income qualified households. Are the funds counted as income or are they exclusive?
  - ACTION: DOE recommends reviewing [Weatherization Program Notice 20-3, Poverty Income Guidelines and Definition of Income](#). These funds are exclusive, as one time payments.
- What relief (if any) can we give for [Weatherization Program Notice 20-3, Poverty Income Guidelines and Definition of Income](#) on *“Self-Certification: After all other avenues of documenting income eligibility are exhausted, self-certification is allowable. However, evidence of the various attempts at proving eligibility must be contained in the client file, including a notarized statement signed by the potential applicant indicating that the applicant has no other proof of income.”*
  - ACTION: During this time of sheltering-at-home, WAP agencies could allow a client to self-certify that they have no other proof of income but specify that a notarized statement later will be required, once the jurisdiction is in Phase 3 of the Guidelines.
- WAP organizations have data-sharing agreements with other federal programs for eligibility purposes (e.g., LIHEAP, SNAP). Would it be appropriate to share any available COVID-19 data among programs?
  - ACTION: Review the U.S. Department of Health and Human Services Office for Civil Rights in Action (HHS OCR) issuance - [“COVID-19 and HIPAA: Disclosures to law enforcement, paramedics, other first responders and public health authorities”](#) on when the HIPAA Privacy Rule permits a covered entity to disclose the protected health information of an individual who has been infected with, or exposed to, COVID-19, with law enforcement, paramedics, other first responders, and public health authorities without the individual’s authorization. Grantees and

Subgrantees should be mindful that need to receive written client approval to share any of their personal data.

### ***Applicant Selection and Preparation***

- What types of COVID-19 data will be publicly available? Will any of this help us screen buildings?
  - ACTION: Refer to state and local health agency resources for additional information. DOE does not receive specific data related specific buildings.
- Deferral process & tracking is needed for clients that are not able to be served immediately due to COVID-19 illness. Can WAP organizations ask for proof that home has been properly sterilized/cleaned following COVID-19 illness?
  - ACTION: WAP workers and/or clients should refer to the to the CDC protocol on how to [Clean and Disinfect](#).
    - Clean AND disinfect frequently touched surfaces daily. This includes tables, doorknobs, light switches, countertops, handles, desks, phones, keyboards, toilets, faucets, and sinks.
    - If surfaces are dirty, clean them. Use detergent or soap and water prior to disinfection.
    - Use a household disinfectant as a final step.
- What are reasonable deferral timeframes for homes with a household that has a positive COVID case, exposure to a positive COVID case, and/or COVID-like symptoms?
  - ACTION: WAP Grantee and with the local network should develop timeframes, consistent with CDC recommendations, to determine their comfort factor to minimize exposure in the working environments.

### ***Client Follow-up***

- How should an organization respond if contacted by a recent WAP client and notified a household member has become ill?
  - ACTION: WAP work on the home should be postponed and client should notify their healthcare provider.
  - ACTION: Notify employees potentially exposed on the work site so they can notify their healthcare providers immediately and refer employees to follow the “[Steps to help prevent the](#)

[spread of COVID-19 if you are sick](#)” as outlined by the CDC guidelines, such as staying home except to seek medical care, separating yourself from other people, monitoring symptoms, etc.

- What responsibility does a WAP organization have to follow-up with clients if an employee or contractor tests positive for COVID following weatherization work?
  - ACTION: WAP organizations should follow [Contract Tracing protocol](#) outlined by the CDC.