



Requirements to Recommerce Weatherization Production

ODOC Weatherization Program Notice 20-3
Issued June 23, 2020

To: All ODOC Subgrantee Weatherization Program Service Providers - Executive Directors and Weatherization Program Managers

From: Amanda Marcott-Thottunkal, Senior Energy Programs Manager

Regulations: [2 CFR § 200.431 - Compensation - fringe benefits](#); [CAA Manual Requirement 310](#); [Oklahoma Governor's Executive Order](#); [Oklahoma's Open Up and Recover Safely Plan](#)

Purpose: To provide a third update to weatherization Subgrantee Recipients regarding program requirements for the Department of Energy Weatherization Assistance Program 2020 and Oklahoma Department Human Services Low Income Housing and Energy Assistance Program 2019 during the COVID-19 pandemic.

Implementation Date: Effective June 23, 2020. This guidance will remain in effect until further ODOC notice.

This Program Notice supersedes ODOC Weatherization Program Notice 19-9.

Regulatory Background

On March 15, 2020, the Office of the Oklahoma Governor issued an [Executive Order](#) declaring a state of emergency due to COVID-19. On May 30, 2020, the Office of the Oklahoma Governor issued another [Executive Order](#) continuing the state of emergency. The U.S Department of Energy released [Weatherization Assistance Program Memorandum 060](#) during the first few known weeks of the COVID-19 pandemic and [Weatherization Assistance Program Memorandum 062](#) to provide guidance on following the White House's [Opening Up America Again Guidelines](#). Oklahoma also began implementing a [reopening plan](#) similar to these guidelines. Oklahoma began Phase 3 on June 1, 2020. Phase 3 encourages vulnerable populations to continue to follow safer-at-home policies and for all individuals to continue to follow the Center for Disease Control (CDC) guidelines for [social distancing](#). Given that Oklahoma's Weatherization Program provides valuable and much needed services to vulnerable households who may be at higher risk for COVID-19, it is important that our weatherization network work diligently to

follow national and state guidance on resuming production in client homes. We have an important public health role and must be mindful of ways we can collectively reduce risk of exposure for the health and safety of clients, weatherization workers, subcontractors, and the community at large. This WPN provides guidance to Subgrantee Recipients on resuming production.

Program Guidance

1. Every Subgrantee Recipient must receive ODOC written approval on a **Pandemic Response Re-opening Plan** before resuming production. No Subgrantee Recipient will be allowed to enter a client home until ODOC has provided written Plan approval. ODOC reserves the right to reject any Plan and request resubmission or additional clarification on any Plan.
 - a. Each Subgrantee Recipient must submit the following:
 - Pandemic Response Re-opening Plan
 - Pandemic Response Reopening Plan ChecklistThese must be submitted no later than **July 31, 2020** to their assigned Program Representative.
 - b. COVID 19 Training Completion documentation for Crew Leader, Program Manager, and Quality Control Inspector must be submitted prior to ODOC final approval of Re-opening Plan and Re-Opening Plan Checklist (*See Section 21 for more information*).
2. All Pandemic Response Re-opening Plans must include, at a minimum, a description of how each Subgrantee Recipient will comply with the following minimum requirements. Descriptions must be written and organized according to the order they appear below:
 - a. Subgrantee Recipients must list their proposed planned date for resuming production. Once ODOC has provided Re-opening Plan approval, Subgrantee Recipient must make sure their OKGrants approved management plan reconciles with Re-opening Plan.
 - b. ODOC Form 22B - OK WAP Pandemic Pre Screen Client Questionnaire [Attachment A] must be completed for all clients prior to visiting a client home. If a client cannot pass the Pre Screen Client Questionnaire, then the client must be deferred. The completed form must be maintained in the client file.
 - c. Health and safety checks of all Subgrantee Recipient weatherization workers and subcontractors must be completed prior to visiting a client home.
 - d. Subgrantee Recipients must provide some client education about COVID-19 (see Attachment D - CDC COVID-19 Client Education Examples). Plans must describe or provide a link to client education materials that the Subgrantee Recipient will use.
 - e. Subgrantee Recipients must implement additional health and safety (H&S) protocols that weatherization workers will follow while at a client home following CDC and the Oklahoma Department of Health recommendations. Although ODOC is not requiring a minimum

number of H&S protocols, Plans will not be approved without some descriptions of internal processes and procedures that will be implemented following CDC guidelines. [see Attachment B – Pandemic Recommendations and Best Practices for possible protocols that can be implemented]

- f. Subgrantee Recipients must ensure that subcontractors will comply with all additional H&S Protocols and their ODOC approved Reopening Plan.
 - g. Subgrantee Recipients must develop a Pandemic Response Reopening Plan Checklist and provide assurances in the Plan that the Checklist will be used to document compliance with the Subgrantee Recipient's Reopening Plan. Each client file must contain a completed checklist. Each Subgrantee Recipient may design their own, use ODOC's example checklist, or modify ODOC's example checklist [see Attachment C – Example Pandemic Response Reopening Plan Checklist]
 - h. Subgrantee Recipients must maintain a separate deferral process for all COVID-19 clients. The deferral process must comply with Section 2 of this policy.
 - i. Subgrantee Recipients must establish a process by which a list of all workers, subcontractors, and households members who come and go from the job site are noted to aid in informing clients and WAP staff in the event that that there is a known case of COVID-19.
 - j. Subgrantee Recipients must establish a process to inform clients, subcontractors, and WAP staff in the event that either a weatherization worker or client tests positive for COVID 19 (if client notifies Subgrantee Recipient).
 - k. A COVID-19 "point person", who is responsible for Reopening Plan implementation, must be identified by the Subgrantee Recipient. This point person must be named in the Plan.
 - l. All Program Managers, Crew Leaders, and Quality Control Inspectors must complete a COVID-19 Safety training with third party documentation (badge, certificate). **This training MUST be completed prior to the proposed date for resuming production.**
 - a. Training completion documentation must be submitted to the assigned ODOC Program Representative upon completion, before proposed recommence date. ODOC will not provide final Re-opening Plan approval until training documentation is received.
2. Subgrantee Recipients must have a separate process for COVID 19 related deferrals and wait listed clients.
- a. COVID-19 deferred clients must be kept track of separately from other clients and prioritized for follow up after 30 days. This time frame must be standardized and communicated with all clients at the time of deferral. This does not mean a home must be weatherized

after 30 days; rather, the timeframe is just to communicate an expectation on when the client can expect to receive follow up contact from the agency to determine if the home is now eligible or additional waiting will be required.

- b. Subgrantee Recipients must complete Form 33 for all deferrals (including COVID-19) and attempt to obtain client signature. However, an in – person signature is not required for COVID 19 deferrals. Subgrantee Recipients may create a process or procedure for obtaining electronic client signature. An email or text from the client stating they agree and understand why their home is being deferred and how long they must wait to be considered eligible again for services is also acceptable. Copies of Form 33 may be emailed, mailed, or texted. See also [DOE WPN 62](#) for more suggestions.
3. If you have any questions about this Program Notice, please contact the Senior Energy Program Manager – Amanda Marcott-Thottunkal, amanda.marcott-thottunkal@okcommerce.gov.

Resources:

- National Association of Community Service Providers (NASPCSP) - COVID-19 [Resources](#)
- National Community Action Partnership (CAP) - COVID-19 [Resources](#)
- Centers for Disease Control (CDC) - COVID-19 [Resources](#)
- Centers for Disease Control (CDC)– [Implementation of Mitigation Strategies for Communities with Local COVID-19 Transmission](#)
- Centers for Disease Control (CDC) – [Contact Tracing](#)
- Occupational Safety and Health Administration (OSHA) - COVID-19 [Resources](#)
- Federal Emergency Management Agency (FEMA) - COVID-19 [Resources](#)
- Housing and Urban Development (HUD) - COVID-19 [Resources](#)
- Oklahoma Department of Health – COVID-19 [Guidance](#)
- CAPLAW’s [brief](#) – Managing Coronavirus Risks: What Should the Community Action Network Think About?
- CAPLAW’s [Guidance](#) – Building Readiness : Opening our Doors

Attachments:

- Attachment A – Pandemic Pre Screen Client Questionnaire
- Attachment B – Pandemic Recommendations and Best Practices
- Attachment C – Example Pandemic Response Reopening Plan Checklist
- Attachment D – CDC COVID 19 Client Education Examples