June 25, 2020

ODOC WPN 20-3
Requirements to Recomence Weatherization Production

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Webinar Outcomes

• Learn what ODOC is requiring of Subgrantees to recommence their weatherization program per WPN 20-3
• Understand what ODOC expects in a Reopening Plan
Requirements to Recomence Weatherization Production
ODOC Weatherization Program Notice 20-3
Issued June 23, 2020
WPN 20-3 Released

**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.
WPN 20-3 Released

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.
Pandemic Response Re-opening Plan Requirement

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:
      ᵀ circle Pandemic Response Re-opening Plan
      ᵀ circle Pandemic Response Reopening Plan Checklist
      These 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:
Pandemic Response Re-opening Plan Examples

**Requirement from WPN**

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.

**Example Re-opening Plan Process**

- “Our WX Program would like to recommence production on July 6, 2020. This date may be subject to change depending upon ODOC approval, the required training completion, and PPE procurement. This tentative date will be documented and reconciled with the management plan to ensure compliance after approval of this re-opening plan.”
 Requirement from WPN

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.

Example Re-opening Plan Process

• “Our WX Program will use ODOC FORM 22B before visiting the client home. In the event that the timeline between visits is longer than 3 days, we will use the section for additional notes (on page 3) to document when the client was screened for additional visits from WAP staff or subcontractors,. This form may be used more often (every visit) depending on scheduling and distance to the client’s home and will be documented accordingly. This form will be provided to the client and maintained in the client file.”
Pandemic Response Re-opening Plan

See ODOC WPN 20-3 Attachment A - Form 22B Pandemic Pre-Screen Client Questionnaire
Client Education of Liability and Hold Harmless

- Educate clients so that they not only sign Form 22B, but that they understand what they are signing.

- Hold harmless = the party signing will not be able to recover damages if they suffer from COVID-19 exposure from the named groups in performance from the contract (your agency, ODOC)

- Indemnify = If a client were to try to sue ODOC (in addition to or in lieu of a Subgrantee), ODOC would not be responsible for paying any damages, in the event we were ordered to pay (if allowed by law).
Contract Part II – Additional Liability Requirement

To Be Added to Contract Part II of all DOE WAP 2020 Contracts:

• “To the extent allowable by law, Subgrantee shall hold harmless ODOC, its agents, officers and employees from any loss or injury sustained either directly or indirectly as a result of exposure to COVID-19 and shall indemnify ODOC of the same from any claims made by third parties”
Requirement from WPN

c. Health and safety checks of all Subgrantee Recipient weatherization workers and subcontractors must be completed prior to visiting a client home.

Example Re-opening Plan Process

• “Our WX Program has employee and subcontractor screening and health and safety checks in place. We require the employees and subcontractor to self check for fever and any flu-like symptoms before arriving to the office or jobsite daily. We have questions in place that employees can ask themselves to ensure that they are not coming into the office or jobsite when showing any fever or flu-like symptoms. We ensure that subcontractors are using the same self check questions and protocols.”
Pandemic Response Re-opening Plan Examples

Requirement from WPN

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.

Example Re-opening Plan Process

• “Our WX program will educate the client with the examples provided by ODOC WPN 20-3 Attachment D CDC COVID-19 Client Education. We will provide the client with this educational material during the client pre-screen questionnaire if possible. If unable to provide the client education at that time, it will be provided upon the first visit to the home before any work or progress is completed on the home.”
What you should know about COVID-19 to protect yourself and others

Know about COVID-19

- Coronavirus (COVID-19) is an illness caused by a virus that can spread from person to person.
- The virus that causes COVID-19 is a new coronavirus that has spread throughout the world.
- COVID-19 symptoms can range from mild (or no symptoms) to severe illness.

Practice social distancing

- Buy groceries and medicine, go to the doctor, and complete banking activities online when possible.
- If you must go in person, stay at least 6 feet away from others and disinfect items you must touch.
- Get deliveries and takeout, and keep a paper record of contact.

Prevent the spread of COVID-19 if you are sick


If you are sick with COVID-19 or think you might have COVID-19, follow the steps below to help protect others in your home and community.

Stay home except to get medical care.

- Stay home. Most people with COVID-19 have mild illness and are able to recover at home without medical care. Do not leave your home, except to get medical care. Do not visit public areas.
- Take care of yourself. Get rest and stay hydrated.
- Get medical care when needed. Call your doctor before you go to their office for care. But, if you have trouble breathing or other concerning symptoms, call 911 for immediate help.
- Avoid public transportation, ride-sharing, or taxis.

If you develop emergency warning signs for COVID-19 get medical attention immediately. Emergency warning signs include:

- Trouble breathing
- Persistent pain or pressure in the chest
- New confusion or not able to be woken
- Bluish lips or face

*This list is not all inclusive. Please contact your medical provider for any other symptoms that are severe or concerning to you.

Call 911 if you have a medical emergency. If you have a medical emergency and need to call 911, notify the operator that you have or think you might have, COVID-19. If possible, put on a face mask before medical help arrives.

How to Protect Yourself and Others

Know how it spreads

- There is currently no vaccine to prevent coronavirus disease 2019 (COVID-19).
- The best way to prevent illness is to avoid being exposed to this virus.
- The virus is thought to spread mainly from person-to-person.
- Between people who are in close contact with one another (within about 6 feet).
- Through respiratory droplets produced when an infected person coughs, sneezes or talks.
- These droplets can land in the mouths or noses of people who are nearby or possibly be inhaled into the lungs.
- Some recent studies have suggested that COVID-19 may be spread by people who are not showing symptoms.

CDC Client Education Examples
Pandemic Response Re-opening Plan Examples

Requirement from WPN

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]

Example Re-opening Plan Process

• “The WX program will be implementing additional safety protocols to include both the WAP employees and subcontractors wearing masks (cloth or N95) while in the client’s home. We will ask the clients to wear masks (provided by the WAP program) and if the client is not comfortable wearing a mask, WAP employees and subcontractors will wear filtered (N95) masks for additional protection. This will be documented on the Pandemic Response Re-opening Plan Checklist. The WX program will follow OSHA and CDC guidance on proper mask protocols (doffing and donning, cleaning, re-using, extended use, and others as needed).”
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Pandemic Response Re-opening Plan Examples

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Example Re-opening Plan Process

• “The WX program will be implementing additional safety protocols including both WAP employees and subcontractors requirement to clean / sanitize / disinfect surfaces in the client’s home, where work will be performed, both before and after the job task. We will also clean / sanitize / disinfect tools and other high touch areas (truck, trailer, equipment) to prevent cross-contamination. This will be documented on the Pandemic Response Re-opening Plan Checklist. The WX program will follow CDC and EPA guidance on how to properly clean / sanitize / disinfect surfaces.”
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Example Re-opening Plan Process

• “WX program will follow CDC guidance on social distancing (6 feet minimum) and hand washing / sanitizing (20 seconds minimum). Hand washing and sanitizing will be completed while donning / doffing PPE and any time needed for client interaction (signatures and/or client education). Social distancing of a minimum of 6 feet will be followed while in the client home, and any time needed for client interaction (signatures and/or client education). This is implemented by using a table or surface to transfer documents and maintain a distance of 6 feet and/or other methods as needed (such as the Ziploc bag method with signature slots). This process will be documented on the Pandemic Response Checklist.”
# Pandemic Response Re-opening Plan Examples

4. Clean surfaces **before** and **after** you are performing work

5. Face covering is required in the client home for both **clients** and **staff**.
   - Wear face covering (cloth, bandana, etc.) or mask over nose and mouth to prevent spread of virus
   - Clients are only required to wear mask while in same area/room as WAP staff.
   - Clients must leave the area where work is being performed to remove the face covering.
   - (This is not needed when outside the clients home beyond 10 feet from exterior of home)

6. Gloves are required for staff to clean surfaces in the client home and when handling anything the client needs to touch
   - (such as client education paperwork or paperwork to be signed)

7. Follow Safety protocols for document handling to prevent contamination
   - The virus is estimated to remain active on paper 4-5 days; on cardboard up to 24 hours; on plastic 2-3 days
   - Use of gloves/hand sanitizer required; wash hands between files/documents; have client sign using own pen;
   - limit human to paper touches & sanitize between touches & humans

8. Prevent cross contamination of PPE, tools, and equipment
   - Follow proper CDC and/or OSHA protocols for disposal and maintenance of PPE
   - Clean tools between uses and avoid sharing with coworker, if possible
   - Sanitize hands before returning to vehicle or office
   - One driver per vehicle per day, disinfect the drivers controls after use

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**Note:**

It may be easier to determine the additional safety protocols needed by building or editing a list like shown here.
### Pandemic Response Re-opening Plan Examples

2. Follow Safety protocols for document handling to prevent contamination
   - The virus is estimated to remain active on paper 4-5 days; on cardboard up to 24 hours; on plastic 2-3 days
   - Use of gloves/hand sanitizer required; wash hands between files/documents; documents for client signature placed in plastic zip lock bag; bag wiped down with sanitary wipe; cut slit for signature area; have client sign using own pen; wipe bag down again; repeat as needed; limit human to paper touches & sanitize between touches & humans

3. Designate one crew leader per jobsite to keep a list of workers and household members who come and go from the jobsite.

4. Wear gloves **inside** and **outside** of client home, replace as needed, wash hands and sanitize between glove replacement

5. Wear a filtered mask or respirator (N95) **inside and outside** of the client home, if possible
   - (only if and when possible, since these masks need to be available to priority front line workers first)

6. Wear eye protection (safety glasses, face shields, or goggles)

7. Sanitize surfaces and build plastic walls (**same as lead safe**) to isolate the area where work is being performed

8. Reduce the number of crew and clients 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.

9. Use electronic signature or other types of technology to obtain client signatures.
   - This can be accomplished with e-forms, mobile applications, and etc.

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**Note:**

This example safety protocol list also has best practices to consider. It may be easier to determine the additional safety protocols needed by building or editing a list like shown here.
Requirement from WPN

f. Subgrantee Recipients must ensure that subcontractors will comply with all additional H&S Protocols and their ODOC approved Reopening Plan.

Example Re-opening Plan Process

• “WX program will ensure subcontractors comply with additional safety protocols by providing them a copy of the re-opening plan, the re-opening plan checklist, additional health and safety protocols, and client education that will be used. WAP employees will meet with subcontractors, if needed, to ensure the additional safety protocols are being met.”
Requirement from WPN

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].

Example Re-opening Plan Process

- “WX program has provided the Pandemic Response Checklist (attached to re-opening plan) to be used for every WAP client home and kept in the client file. This checklist has been created / edited / modified to comply with this re-opening plan, including, but not limited to, client pre-screening usage, PPE (masks, gloves, etc.), social distancing, surface cleaning, hand washing, client education, deferral dates and follow-ups. See Pandemic Response Checklist.”
Pandemic Response Re-opening Plan Examples

Note: This will need to be created or modified to reconcile with individual re-opening plans. This is just an example.
Requirement from WPN

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.

  • See Section 2 of ODOC WPN 20-3 for complete guidance.

Example Re-opening Plan Process

• “WX program will determine deferrals based off the Client Pre-screen Questionnaire, Pandemic Response Checklist, WAP staff educated decisions, client comfort levels, current local or state regulations, and/or COVID-19 “hot zone” counties. This pandemic deferral list will be kept separately from other clients and prioritized for follow up after 30 days. If access is still prohibited, the client will remain on the wait list an additional 30 days, as needed. Form 33 will be used for deferrals and, if needed, electronic signatures, emails with photo documentation, or mail in copies will be used for the client file documentation. If the status of the home has changed at follow-up, then the weatherization process will proceed.”
Deferral Policy

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.
**Pandemic Response Re-opening Plan Examples**

**Requirement from WPN**

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 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).

**Example Re-opening Plan Process**

- “In addition to the previous additional safety protocols, WAP staff and subcontractors will keep track of who comes and goes from the job site as needed. WAP staff will also request clients do not have visitors at the home while workers are present, and post a sign on the door, if needed, to inform visitors or others of WAP staff presence.”

- “In addition to the previous additional safety protocols, the WX program will inform clients, staff, and subcontractors in the event of a positive COVID-19 test during or after a job in progress. This will be implemented by phone, mail, and/or email.”
**Pandemic Response Re-opening Plan Examples**

**Requirement from WPN**

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.

**Example Re-opening Plan Process**

- “The WX Program COVID-19 point person will be [Insert Employee Name]. This employee will ensure compliance and implementation of the re-opening plan. This employee will also monitor current COVID-19 positive test numbers in the counties that we serve to ensure we are not working in an area that would be considered unsafe. This employee will monitor the PPE and cleaning supply inventory to ensure that everything needed for additional safety protocols is available. This employee will ensure the client pre-screen questionnaire, pandemic response checklist, and client education is used as stated in this re-opening plan.”
Requirement from WPN

I. 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.

Example Re-opening Plan Process

- “The WX Program Manager, QCI, and all Crew Leaders have completed the COVID-19 Workplace Safety Training provided by DOE through the WAP Litmos Training Program. The third party documentation has been attached to this re-opening plan. This training has been completed before the proposed date of recommencing production in the beginning of this re-opening plan.”
These are just a few examples of the processes needed in the Pandemic Response Re-opening Plans. This does not include an example for every requirement. It is the responsibility of the subgrantee to ensure compliance with ODOC WPN 20-3 before the re-opening plan is submitted for approval. Please read WPN 20-3 and all the attachments for complete guidance.
Resources:

- National Association of Community Service Providers (NASCSP) - 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