



Requirements for Pandemic Safety Plans

ODOC Weatherization Program Notice 21-2
Issued May 17, 2021

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 an update to weatherization Subgrantee Recipients regarding COVID 19 health and safety protocols required for Pandemic Safety Plans to receive funding for the Department of Energy Weatherization Assistance Program 2021 and Oklahoma Department Human Services Low Income Housing and Energy Assistance Program 2019/2020/2021 during the ongoing COVID-19 pandemic.

Implementation Date: Effective May 17, 2021. This guidance will remain in effect until further ODOC notice.

This Program Notice supersedes ODOC Weatherization Program Notice 20-3.

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to provide guidance on following the White House's Opening Up America Again Guidelines (which has now been replaced and superseded by the National Strategy for the COVID-19 Response and Pandemic Preparedness). Oklahoma also began implementing a reopening plan, called Open Up & Recover Safely (OURS) Plan. 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. On Tuesday, May 4, 2021, the Office of the Oklahoma Governor withdrew and rescinded the COVID 19 State of Emergency. However, 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 still important that our weatherization network work diligently to follow national and state health and safety guidance as much as possible while working in a client home. 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 continuing to maintain the high standards of health and safety as our network continues to ramp up production.

Program Guidance

1. **Every Subgrantee Recipient must have in place an ODOC approved (in writing) Pandemic Safety Plan.**
2. Each Subgrantee Recipient must submit the following to ODOC no later than **June 21, 2021** (with or without requested changes):
 - 2021 – 2022 Pandemic Safety Plan
 - 2021 – 2022 Pandemic Safety Plan Checklist
3. A Subgrantee Recipient may request an update to their Pandemic Safety Plan at any time. All updated **Pandemic Safety Plans** must receive ODOC written approval. ODOC reserves the right to reject any Plan and request resubmission or additional clarification on any Plan.
2. All Pandemic Safety 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. 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.
 - b. Health and safety checks of all Subgrantee Recipient weatherization workers and subcontractors must be completed prior to visiting a client home.
 - c. 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.
 - d. 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]
- e. Subgrantee Recipients must ensure that subcontractors will comply with all additional H&S Protocols and their ODOC approved Pandemic Safety Plan.
 - f. Subgrantee Recipients must develop a Pandemic Safety Plan Checklist and provide assurances in the Plan that the Checklist will be used to document compliance with the Subgrantee Recipient's Safety 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 Safety Plan Checklist & Contact Log]
 - g. Subgrantee Recipients must maintain a separate deferral process for all COVID-19 clients. The deferral process must comply with Section 2 of this policy.
 - h. Subgrantee Recipients must establish a process by which a list of all workers, subcontractors, and household members who come and go from the job site are noted to aid in informing clients and WAP staff if that there is a known case of COVID-19.
 - i. Subgrantee Recipients must establish a process to inform clients, subcontractors, and WAP staff if either a weatherization worker or client tests positive for COVID 19 (if client notifies Subgrantee Recipient).
 - j. A COVID-19 "point person", who is responsible for Safety Plan implementation, must be identified by the Subgrantee Recipient. This point person must be named in the Plan.
 - k. All Program Managers, Crew Leaders, and Quality Control Inspectors must complete a COVID-19 Safety training with third party documentation (badge, certificate).
 - a. New hires must continue to receive COVID -19 Safety training if a Pandemic Safety Plan is being implemented and required by ODOC.
 - b. Training completion documentation must be submitted to ODOC upon completion.
4. 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 14 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 14 days; rather, the timeframe is just to communicate an expectation on when the client can expect to receive follow up

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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.
5. 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:

- Centers for Disease Control (CDC) - COVID-19 [Resources](#)
- Occupational Safety and Health Administration (OSHA) - COVID-19 [Resources](#)
- Housing and Urban Development (HUD) - COVID-19 [Resources](#)
- Oklahoma Department of Health – COVID-19 [Guidance](#)

Attachments:

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