WX COVID- 19 FAQs

(updated March 30, 2020)

1. Can we pay staff wages and benefits from DOE/LIHEAP funding if subgrantees decided to stop working in clients' homes?

The only direction that DOE provided to KHC in regards to payment of wages and benefits is that it is a state and local decision. KHC has suspended our technical monitoring of the weatherization program; however, we are not telling you that you must suspend your production. According to NASCSP, "federal regulations state that in a shutdown or disaster, employees can be paid out of federal funds if there are written leave policies approved by the governing board." For example, if your board-approved leave policy, states that you can allow staff to use leave time to cover agency shutdowns, you will be able to use federal funds to cover those.

A larger concern is that the use of federal funds will affect your per unit averages, which, as a state are already at an all-time high. KHC will have further decisions regarding this, which may include a decrease in the dollars that subgrantees can spend on a unit.

Please be sure you are using administrative costs when appropriate and are only charging costs to program support that can relate back to a client address.

2. Can our administrative staff do work?

This is also may be a time for your administrative work to get caught up and planning activities to take place. Most of these tasks will be administrative in nature and charged to admin. KHC will not prevent you from allowing administrative staff to work from home and will allow purchases of computers, monitors, and software in order to do so.

This may be "down-time", which allows staff to catch up and work on "big picture" tasks. Some items of concentration may be aligning policies and procedures with KHC, doing online training programs, which KHC is sharing with subgrantees in regional trainings, and/or reviewing monitoring issues and addressing them.

As is recommended by the CDC, KHC is practicing social distancing. We are working from home as much as possible, so we support any plans that you have to encourage teleworking as well.

3. Can contactors still work on houses?

Contractors' ability to work on homes during this time is the decision of the sub-grantee and contractor.

4. What if I am a CAA contracting QCIs to another CAA?

If you are a sub-grantee, who is contracting out your QCI to a sister agency, you will need to make the decision if you are going to continue that service during this time. However, KHC asks that you inform those sister agencies as soon as you have a decision to suspend contracting work.

5. What do we do if clients are sick in their home, or we have sick crew?

This is an agency call as to how you want to proceed in these situations. More information on how to handle this situation may be released in the future from federal funders.

6. Will KHC be conducting technical monitorings in the next month?

KHC suspended technical onsite monitorings until further notice. We will be conducting desk financial/administrative monitorings and portions of the technical monitoring that can be reviewed in our offices.

7. Can we do work on jobs?

Please refer to the KHC guidance effective on Monday, March 23, 2020.

8. How do we practice social distancing with limited vehicles?

If you do not have enough vehicles to practice social distancing, you may offer staff to drive their personal vehicles to job sites. You can reimburse mileage according to your agency policies and charge those reimbursements to program support.

9. Are we allowed to pay contractors for partial work?

The manual says only work that has documentation of being inspected and accepted may be invoiced, but during this time and especially since we cannot inspect projects, the inspection piece does not have to be completed to pay for partial contracted work. The QCI will, however, need to be completed after the pandemic in order to count the units as completed. While this in up to local decision, a best practice would be to retain a percentage of contractor invoicing until completion to ensure the work is either completed later or if corrections need to be made at a later date. Subgrantees have the right to create a form for the contractor to sign when receiving payment to ensure work is completed and any deficiencies are created.

10. Can subgrantees use T&TA funds to pay contractors for training items discussed on last week's call?

No. T&TA cannot be used to pay contractor time for training.

11. Do we need to document what we are doing with the T&TA funds?

You will need to retain documentation of your training completions and time/activities report, which documents time spent on the trainings (actuals not projections). Reporting requirements for federal grants are outlined in 2 CFR 200.430 (available here).

12. Should we spend DOE T&TA before LIHEAP T&TA?

DOE funding can roll over next year while unspent LIHEAP money will revert back to CHFS. Determining which funding source to use is a sub-grantee decision. KHC will require you to document with time/activities reports any wages paid to staff for training. All training completion documentation and time/activities reports should be maintained by the subgrantee for future monitorings.

13. Where could we find further guidance on these issues?

The CAPLAW website has good guidance for CAAs

https://www.caplaw.org/resources/coronavirusupdates.html

Click here for a tipsheet.

14. What are some links for virtual training options?

DOE recently debuted a <u>financial and administrative training tool</u>, which is online and virtual. All administrative and financial staff can use the site for training and charge their time to T&TA. The training is very interactive and is a really great way to train staff, perhaps even crew members would like this perspective.