Weatherization Assistance Program (WAP) Restart After COVID-19
Updated 6/4/2020

Due to the very nature of WAP, the personal contacts between WAP staff and clients, and the amount of work that occurs inside clients' homes, Kentucky Housing Corporation will not re-open the WAP to interior work until May 25. Effective May 25th, WAP subgrantees may perform weatherization duties to the full extent of the program if the following guidelines are followed and the subgrantee feels that it is in the best interest of the subgrantee and clients. In other words, the "reopening" of the WAP in Kentucky will still be a local decision. The guidelines below are the MINIMUM requirements for reopening WAP.

Before Work Begins

Infection Measures

1. Prohibit handshaking, maintain social distancing of 6 feet
2. Frequent handwashing with soap and water for at least 20 seconds, and regular use of hand sanitizer with at least 60% alcohol when soap and water are unavailable
3. Avoid touching eyes, nose or mouth with unwashed hands
4. Routine, daily disinfecting of equipment and tools being used in the field

Crew Training

1. Ensure your organization is complying with the Governor's Healthy at Work guidelines, CDC guidelines, and OSHA requirements.
2. Finish the 4-hour virtual training provided by Santa Fe Community College Energy Smart Academy, COVID-19: Workplace Safety, which is $75 per person or $50 for groups over five. This training can be charged to T&TA or program support if subgrantees are out of T&TA funding. For registration, visit https://www.energysmartacademy.com/online-courses.html. (Other training options for COVID-19 workplace safety may be substituted, but they must be approved by KHC prior to attending the training and beginning field work.)
3. Train and equip all field workers with Personal Protective Equipment (PPE) and how to properly use it, remove it and clean it to avoid contamination of self and others. Agencies must continue to adhere to all WAP safety requirements while performing weatherization services and therefore must ensure that adequate supplies of PPE can be obtained prior to scheduling work. Examples of PPE include gloves, goggles, face shields and masks, N95 filtering respirators.
4. Provide crews with sanitary wipes that can be used to clean surfaces in clients' homes both *before* and *after* *performing work.* See the EPA list of disinfectants for use against SARS-CoV-2 (novel coronavirus).

5. Ensure all vehicles and crew members are equipped with hand sanitizer with at least 60% alcohol.
6. Minimize the number of crew and clients in the home at the time of interior work; try to isolate clients to one room. Crews conducting interior work will wear PPE at the highest level available and required by the weatherization measure. At minimum all staff must wear masks and gloves when in client homes.
7. Crews conducting interior work will wear PPE to cover eyes, nose, mouth, and hands.
8. Clients remaining in the home should wear face masks when WAP crews are in the home. WAP crews should offer face masks to clients without their own masks.
9. Consider installing a physical barrier, such as a clear sheet of plastic, to isolate a client while interior work is being conducted.
10. Only one driver per vehicle per day; disinfect the driver's controls at the end of each day. Any other needed crew in addition to drivers may be reimbursed for mileage when they drive separately.
11. If workers arrive at a site and determine a client is exhibiting respiratory illness, crews should not proceed with work and report to the subgrantee. Subgrantee may defer the unit due to COVID-19 and follow COVID-19 deferral system (see Deferrals below).

Client/Crew Safety

Inventory Checklists

Respirators	Paper towels
N95 face masks	Hand soap
Gloves	Cleaners
Tyvek Suits	Client education materials
Booties	Client face masks

Client Screening

CAP agencies who continue to go into client homes for weatherization or other activities should create a screening tool they use with ALL clients (to ensure there is no discrimination) by calling BEFORE entering the home. Subgrantees may choose to use thermometers with crew and clients before entering a home. If purchasing thermometers, subgrantees can charge costs to program support.

1. Has anyone in the household tested positive for COVID-19 in the last two weeks?
2. Is anyone in your household experiencing 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. Consider using the COVID-19 self-screening tool to help determine if clients should be serviced or deferred for a period. Check your risk for COVID-19 - https://c19check.com/start.

HIPAA Privacy and COVID-19: In light of the Novel Coronavirus (2019-nCoV) outbreak, the Office for Civil Rights (OCR) at the U.S. Department of Health and Human Services (HHS) is providing this bulletin to ensure that HIPAA covered entities and their business associates are aware of the ways that patient information may be shared under the HIPAA Privacy Rule in an outbreak of infectious disease or other emergency situation, and to serve as a reminder that the protections of the Privacy Rule are not set aside during an emergency. The HIPAA Privacy Rule protects the privacy of patients' health information (protected health information) but is balanced to ensure that appropriate uses and disclosures of the information still may be made when necessary to treat a patient, to protect the nation's public health, and for other critical purposes.

Completing a Job

All signatures required on pre- or post-job paperwork should be collected with all safety precautions. KHC will accept electronic signatures if subgrantee has systems in place to collet those. (There are apps that exist to make obtaining electronic signatures easier.)

If electronic signatures can not be obtained, paperwork should be placed in Ziploc bags and handed to clients. Clients use their own pens for signing and place the documents back in the Ziploc bag. When received, Ziploc bags should be sanitized.

All surfaces should be sanitized at the end of each job.

Deferrals

Clients may be deferred for up to 120 days due to the COVID-19 concerns, which may include but are not limited to COVID-19 infection in the household, fears of COVID-19, or client vulnerability due to age and/or health issues. In cases of COVID-19 infection in the household, the household must quarantine for 14 days and exhibit no other COVID-19 symptoms before the CAA can begin weatherization services to the home. In cases where clients decline WAP services due to fears of COVID-19, the clients may contact the CAA at any time to initiate services, provided all safety precautions are followed by the CAA.

WX COVID- 19 & Restart FAQs
(updated June 4, 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 [financial and administrative training tool](#), 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.

15. **Should the additional unemployment benefits due to COVID-19 count as income under the weatherization assistance program (WAP)?**

WPN 20-3 outlines DOE's guidance on countable income for WAP. Unemployment benefits are countable income. At this time, no exemptions on this guidance have been granted due to COVID-19. Unemployment benefits count as income for Kentucky WAP.

16. **Will KHC draft a screening tool for subgrantees to use with clients?**

Because KHC is leaving the restarting of programs up to subgrantees, the screening of clients and the level of restrictions on the screening are up to agency policy. At the bare minimum, KHC wants the screening questions for the guidance included. However, each subgrantee can choose to be more restrictive; therefore, KHC will not be providing a screening tool to subgrantees at this time.

Please keep in mind that the decision to restart your programs is a sub-grantee decision; however, if you choose to restart your programs, you must at least incorporate our guidance in your daily practices.

17. **Are there any new duct blaster or blower door procedures during COVID-19 or new recommended best practices?**

It is critical that agencies develop thorough and thoughtful client screening tools to protect WAP employees during this time of COVID-19. Subgrantees should develop screening tools designed to identify households with COVID-19-positive residents or those who show signs or symptoms of COVID-19 infection.

Please refer to KHC's WAP Restart After COVID-19 memo dated 5/15/20 for more information on client screening. There are no new duct blaster or blower door procedures required during COVID-19.

18. **Can contractors charge mileage because of having to take multiple vehicles to project, while practice social distancing?**

- If the project was awarded and work started, pre-pandemic and the contractor can demonstrate to the agency the additional expenses are beyond the contracted price, the subgrantee can complete a change order.

- If the project was awarded pre-pandemic, but the project was not started, and the contractor can demonstrate to the agency the additional expenses are beyond the contracted price, the subgrantee can rebid the project.

- If the project has not been awarded, or sent out for bid, the contractor may include the additional cost in the bid price.

19. **What is the proper way to use an N95 mask? Does it have to be NIOSH-certified?**

Subgrantees must follow OSHA guidance for the use of N95 filtering facepiece respirators. Whenever OSHA standards require respirator use, there must be a, OSHA-compliant, written respiratory protection program in place. Here is a link to the latest OSHA Enforcement Guidance put out in April -

https://www.osha.gov/memos/2020-04-03/enforcement-guidance-respiratory-protection-and-n95-shortage-due-coronavirus.

There are several links in this document to CDC Guidance and other related OSHA standards. Employers have a responsibility to establish and update operating procedures and communicate them so that employees follow safety and health requirements.

20. **Is there any guidance on restarting WAP services and relates to the types of PPE required for WAP work?**

DOE released WAP Memorandum 062 on May 26, 2020, find more information on this memorandum here:

https://www.energy.gov/sites/prod/files/2020/05/f75/wap-memo-062.pdf