

Memorandum

DATE: **March 25, 2020**

WAP Memorandum 060

REPLY TO

ATTN OF:  **Erica Burrin, Weatherization Assistance Program, Program Manager
Weatherization and Intergovernmental Program Office**

SUBJECT: **Weatherization Assistance Program Frequently Asked Questions Related to COVID-19**

TO: **Weatherization Assistance Program Grantees, Weatherization Assistance Program Subgrantees**

The Department of Energy's (DOE) Weatherization Assistance Program (WAP) is directly impacted by the novel COVID-19 pandemic. DOE WAP wishes to uniformly address current issues the WAP network is grappling with as a result of COVID-19. This memorandum contains information on the Impact of COVID-19 on the WAP workforce and clients, and what actions DOE is considering in light of the situation. This information is set forth below in the form of Frequently Asked Questions (FAQs) and DOE's responses to those questions. DOE will continue to update, as necessary, to address new or ongoing concerns.

Frequently Asked Questions and DOE Actions

Weatherization Program Administration and Production

- As access to client homes becomes more limited, what actions will DOE take to address anticipated spending delays related to decreased production of units?
 - ACTION: DOE will extend grant periods until reasonable analysis demonstrates realistic ability for Grantees, and subsequently Subgrantees, to resume operations and expend funds.
 - DOE recognizes production will be impacted and encourages Grantees to keep the respective Project Officers (PO) updated on changing situations regarding production.
 - ACTION: DOE encourages agencies to follow their established, written policies aligned with [2 CFR Part 200](#) related to use of administrative funds. Administrative funds are not tied to specific production targets by federal rule. However, Grantees may have policies limiting administrative drawn down based on total expenditures. As for labor costs, including salary and fringe benefits, under the Uniform Guidance, agencies can charge the cost of leave to federal grants so long as: (i) the leave is provided under established written leave policies; (ii) the costs are equitably allocated to all related activities; and (iii) the organization uses a consistent accounting basis for costing each type of leave ([2 CFR § 200.431\(b\)](#)).

- What options are there for DOE if there is a production decrease, and as a result, the Average Cost Per Unit (ACPU) may be exceeded by Grantees?
 - ACTION: DOE will allow for both Program Year (PY) 2019 and 2020 funds to be rolled into one budget period that includes the extension of the grant period (6 months to a year). The ACPU (expenditure of financial assistance provided under WAP for labor, weatherization materials, and related matters) *cannot* exceed \$6,500, as adjusted ([10 CFR §440.18\(a\) and \(c\)](#)). The adjusted annual average for PY 2020 is determined by using the percentage increase in the Consumer Price Index (CPI) or 3 percent, whichever is less. For Fiscal Year (FY) 2020 the ACPU is \$7,669. This combination allows all funds within the budget period to function under the greater FY 2020 ACPU number and allows a longer timeframe for work to be done and bring down the ACPU to within allowable amounts, per [10 CFR § 440.18\(a\) and \(c\)](#).

Note: This allowance can be extended and combined based on specific conditions of the Grantee.

- Where work has been stopped due to client/workforce exposure concerns, will DOE allow flexibility to pay contractors before the final inspection is completed?
 - ACTION: DOE is unable to waive the requirement for final inspection for reporting completed units to DOE ([10 CFR § 440.16\(g\)](#)). However, Grantees can provide partial payment for allowable activities under the award. For example, a contractor may be paid for in-progress work completed on a home, but has not had a final inspection.
- Since forty-three (43) July 1 Grantees have not submitted their WAP Annual Plan Application (due May 1, 2020), with current Centers for Disease Control (CDC) social distancing/gathering recommendations, will Grantees still be required to host Public Hearings prior to submitting the State Plan application?
 - ACTION: Grantees can proceed with virtual public hearings, as long as the provisions within [10 CFR § 440.14](#) regarding public notice and ability to for public to comment are adhered to (i.e., Webinar, Live Stream, etc.).

Note: DOE encourages Grantees to hold multiple virtual public hearings as some electronic platforms can be overwhelmed. Holding multiple virtual hearings ensures electronic communications are not overwhelmed and allows access to the public for comments and questions.

- ACTION: DOE is ready and available to process all State Plan submissions, per normal process and procedures. Awards are being executed in a timely manner to ensure federal funds for WAP are obligated to the Grantees.

Weatherization Workforce and Clients

- What recommendations are in place related to interaction and exposure that may put workforce and/or clients (specifically vulnerable clients in high risk categories) at added risk for contracting [COVID-19](#)?
 - ACTION: DOE encourages Grantees to utilize their authority to suspend all weatherization services, or severely limit weatherization services, to service areas impacted by COVID-19 while also ensuring safe practices are being implemented.

Note: Clients may refuse services at this time due to COVID-19 concerns, however Grantees and Subgrantees should ensure that these clients can be given priority once the COVID-19 crisis has passed.

- ACTION: DOE encourages the workforce to increase their knowledge on safe practices through educational efforts, including utilization of CDC-issued resources and information exchange with Grantee-level State Board of Health contacts, including social distancing, covering coughs (and refraining from work if they show signs/symptoms of illness), washing hands frequently, and confirming homes being visited are illness-free prior to visit. DOE encourages the workforce to monitor CDC-issued resources and information frequently to stay apprised of new recommendations and guidelines that may be promulgated as a better understanding of COVID-19 is reached.
 - ACTION: DOE will extend flexibility to Grantees in meeting on-site monitoring requirements since the Grantee operations are also impacted by inability to visit homes. Grantees concerned about meeting the monitoring requirements of the grant should forward those concerns to the respective DOE PO.
- Can weatherization labor/workforce and resources (e.g., trucks) be used to support community relief efforts (e.g., food delivery, assisting in foodbanks, cleaning schools, etc.)?
 - ACTION: DOE does not have a mechanism to support (with labor or resources) community emergency responses. DOE will advise Grantees of any changes to this concern.

Increased Focus on Certification and Training

- What will happen with Home Energy Professional Certifications that expire over the next six months and without opportunity for renewal, leaving the WAP workforce without certified Energy Auditors and Quality Control Inspectors (QCI)?
 - ACTION: DOE is actively working with the Building Performance Institute (BPI) on a path to keep WAP personnel certified for those individuals that have expiration dates over the next six (6) months.

- What opportunities are there for completing training requirements outlined in Weatherization Program Notice (WPN) 15-4?
 - ACTION: DOE will work with the Weatherization Network to encourage any required staff training to be held online or live stream if they can no longer be held in person.
 - ACTION: DOE encourages Grantees and Subgrantees to use this time on administrative and training and technical assistance activities (T&TA), including, but not limited to, completing inventory reconciliation, updating policy and procedures manuals to ensure compliance with federal rules, and considering development of a deferral policy and tracking tool.
 - ACTION: DOE encourages Grantees and Subgrantees to update and/or develop safety protocols to use when the programs are able to move to full production.
 - ACTION: DOE encourages online trainings, virtual conferences, and live/recorded webinars to serve as interim training tools and opportunities for the WAP.
 - ACTION: DOE will work with the Weatherization network to promote available resources and rethink the logistics of previously planned onsite training and conferences (e.g., [BPI Online Courses](#), [WAP Administrative Trainings](#), [Weatherization Standardized Curricula](#), [Weatherization Financial Management Toolkit](#), [WAP Grantee Manager Training Toolkit](#), etc.).
- What options are there for reimbursing costs already incurred by agencies for cancelled trainings/events (e.g., airline cancellations, hotel non-refundable rooms, etc.)?
 - ACTION: DOE encourages agencies to follow their written, approved policies on this matter.

If you have questions regarding the information in this Memorandum, please contact your DOE Project Officer.