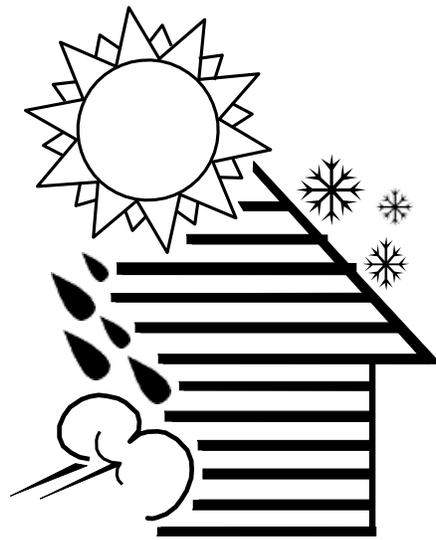


Minnesota Weatherization Assistance Program



*Weatherization
Works*

MINNESOTA WAP PROGRAMMATIC GUIDANCE FOR COVID-19 SAFE WORK PRACTICES

6/18/2020

Produced with
U.S. Department of Energy
Weatherization Assistance Program Funds



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NOTICE: The procedures and best practices, which follow throughout this document, are based on a thorough hazard assessment of weatherization practices conducted by a partnership of Weatherization Assistance Program Service Provider representatives and Commerce staff. This document does not supersede any requirements or guidance from any federal or state authority on COVID-19 safe work practices.

A. COVID-19 Safe Work Practices Policy Statement

- i. **Underlying Principles:** Maintaining the health and safety of Weatherization Assistance Program (WAP) staff, contractors, and clients is the number one priority for Minnesota WAP as work in client homes is resumed.

When weatherization staff and contractors enter a client's home during this time they should be particularly sensitive to the challenges household members may be facing as a result of the COVID-19 pandemic and its resulting impact on day to day life. Now more than ever WAP representatives must do due diligence to treat each household member with dignity and respect.

For WAP staff and contractors, a client's home is an extension of their workplace that includes variables that change on a daily basis. All staff who interact with clients, including administrators, auditors, crews, contractors and QCI have a part to play in helping to ensure the health and safety of weatherization staff, contractors, and client households.

Many aspects of the work completed in client's homes will be fundamentally changed in response to this pandemic. Weatherization workers and contractors must be equipped and empowered to help ensure both their own health and safety and the health and safety of household members.

- ii. **Relevant Authorities:** In [WAP Memo 062](#) the United States Department of Energy (US DOE) provides guidance to the Weatherization Assistance Program (WAP) about returning to work in client's homes, following the lifting of stay at home orders resulting from the COVID-19 pandemic. In accordance with [Guidelines for Opening Up America](#), WAP Memo 062 requires states to implement an approach to returning to weatherizing homes that:

- a. Is based on up-to-date data and readiness;
- b. Mitigates risk of resurgence;
- c. Protects the most vulnerable;
- d. Is implementable on a statewide or county-by-county basis at a governor's discretion.

The guidance recommends referring to the latest information from the Centers for Disease Control and Prevention (CDC), Environmental Protection Agency (EPA), Federal Emergency Management Agency (FEMA), and the U.S. Department of Labor Occupational Safety and Health Administration (OSHA).

Additionally, Minnesota Governor Tim Walz has issued a series of [executive orders](#) to promote the health and safety of Minnesotans and to provide guidance to

individuals, communities, and organizations as they respond to the pandemic. In addition to the guidance they provide, per these executive orders, Minnesota WAP service providers must follow the guidance provided by the CDC, OSHA, and the Minnesota Department of Health (MDH) to promote the health and safety of their employees and members of the public in the work that they do. This includes weatherization staff when working in the service provider office or warehouse setting and weatherization clients who come to a service provider's office.

- iii. **Minnesota Weatherization Programmatic Guidance:** The Minnesota Department of Commerce (Commerce) is issuing additional documentation requirements and guidance related to COVID-19 *as it relates to weatherization work in clients' homes* in order to promote the safety and well-being of household members, weatherization workers, and contractors.

Just as with certain other potential safety hazards found in homes (such as lead and asbestos), this guidance provides practical tools to help service providers implement COVID-19 safe work strategies. This guidance does *not* supersede guidance from the relevant federal and state authorities. Service Providers are responsible for following the requirements of the Governor's Executive Orders, OSHA, the CDC, MDH, EPA, and other federal or state guidance related to the COVID-19 pandemic. Commerce's guidance will reference relevant authorities where applicable.

In order to help make weatherization work safe for workers and our clients, Service Providers will need to consider how their contribution to the process can mitigate the risk of exposure to contagious disease. The following procedures and best practices provide guidance for pre-audit and audits, contractor and crew work, and the quality control inspections.

B. Pre-Requisites to Returning to Weatherization Work in Client Homes: In addition to any guidance from federal and state authorities, Commerce requires that the following actions be taken before returning to weatherization work in client homes:

- i. Service Provider Requirements:
 - a. Service providers will provide a copy of their organization's COVID-19 Preparedness Plan to Commerce.
 - b. Service providers will have on hand sufficient supplies of cleaners, disinfectants, and Personal Protective Equipment (PPE) to perform COVID-19 Safe Work Practices outlined in this guidance for a given site visit. This includes, but is not limited to: surgical masks; gloves; hand sanitizer containing at least 60% alcohol; N95, or equivalent respirators or better (if available); eye protection; and cleaning and disinfecting supplies.
 - c. WAP coordinators and WAP staff who perform work in client homes must

- complete the EnergySmart Academy Workplace Safety Training.
- d. All WAP staff must complete Commerce's Policy Guidance training related to COVID-19 safe work practices. NOTE: This training content does not supersede federal or state guidance and does not absolve service providers from understanding and implementing relevant federal and state guidance.

ii. Contractor Requirements:

- a. Contractors will provide a copy of their organization's COVID-19 Preparedness Plan to service providers before performing work.
- b. At least one person from each WAP building shell contractor must complete the EnergySmart Academy Workplace Safety Training.
- c. All mechanical, building shell, and electrical contractor staff who enter client homes must complete Commerce's contractor training related to COVID-19 safe work practices. NOTE: This training content does not supersede federal or state guidance and does not absolve contractors from understanding and implementing relevant federal and state guidance.

C. Documentation Requirements: During Minnesota's phased reopening Minnesota WAP service providers will document COVID-19 Safe Work Practices using the following forms. Documents listed in this section will be saved in the client file. These forms can be found [here](#).

- i. Pre-Site Visit Client Contact Checklist
 - a. Client Education
 - b. Potential Exposure Screening Questions
 - c. Symptoms Screening Questions
- ii. In-Home Safety Plan Screening Questions
- iii. In-Home Safety Plan
- iv. Auditor Site Visit Checklist
- v. Crew/Contractor Site Visit Checklist
- vi. QCI Checklist

D. Prior to Site Visit: In addition to any guidance from federal and state authorities, Commerce requires that the following steps be taken:

- i. **Provide Client Education Regarding COVID-19 Safe Work Practices:** Client education about COVID-19 Safe Work Practices is paramount to maintaining the trust and dignity of WAP clients. WAP staff and contractors will provide relevant client education that includes information about social distancing, safety protocols, and risk mitigation steps that will be taken related to COVID-19 Safe Work Practices.

- ii. **Pre-gather Client Information:** To minimize time spent in the home, workers should gather as much information as possible through information provided by client and/or electronic media such as: tax records, photos, and measurements etc.
 - iii. **Obtain Client Forms and Signatures Remotely:** In order to minimize contact between WAP staff/ contractors and clients, when at all possible, provide all forms and documents to clients electronically or by mail. When forms/signatures must be delivered in-person, follow current CDC guidance.
 - iv. **Pre-Site Visit Client Contact Checklist:** The Pre-Site Visit Client Contact Checklist must be completed via telephone or other remote communication prior to weatherization workers entering a client's home.
 - v. **Client Privacy:** Clients cannot be asked to provide any health information beyond the Potential Exposure and COVID-19 Symptoms Screening Questions.
 - vi. **Potential Exposure and Symptoms Screening Questions, Household Members:** If any household member answers yes to any of the Potential Exposure or the Symptoms Screening Questions, the weatherization site visit must be postponed for at least 14 days. Prior to each day weatherization staff enter the home, staff entering the home must confirm that the answers to the questions have not changed and review the In-Home Safety Plan with the client.
 - vii. **Potential Exposure and Symptoms Screening Questions, WAP Staff/ Contractors:** Any WAP staff or contractor who answers yes to any of the Potential Exposure or the Symptoms Screening Questions shall not enter the home of a WAP client for 14 days.
 - viii. **Postponement and Deferral Due to COVID-19 Concerns:** Clients may decline services due to concern about COVID-19, without penalty. Units that are postponed or deferred due to COVID-19 concerns will be returned to the top of the list when the concerns abate. If a client declines to answer the Potential Exposure and Symptoms Screening Questions the home will be deferred until either the client is willing to answer the screening questions or this guidance is revoked.
- E. In-Home Safety Plan:** In addition to any guidance from federal and state authorities, an In-Home Safety Plan, based on the answers provided during the pre-site visit In-Home Safety Plan Screening Questions and revised based on the initial audit, must be developed for each home.
- i. **In-Home Safety Plan:** All weatherization staff and contractors must follow the In-Home Safety Plan in accordance with their [OSHA workplace hazard assessment](#).

- ii. **Initial Client Interview:** The In-Home Safety Plan Screening Questions must be administered prior to the site visit. They provide the auditor with preliminary information for use during their own site visit and as they develop the In-Home Safety Plan. In addition to the In-Home Safety Plan, the auditor will provide specific instructions related to individual measures in the work order as necessary. Crews, contractors, and QCIs must follow the In-Home Safety Plan and be prepared to consider changes to the plan if they find that conditions in the home are different than those on which the plan was based.

F. Site Visit: In addition to any guidance from federal and state authorities, Commerce requires the following measures be implemented:

- i. **In-Home Safety Plan and Checklists:** Auditors, Crews/ Contractors, and QCIs shall follow all applicable guidance along with all procedures outlined in the In-Home Safety Plan and corresponding checklists.
- ii. **Review of In-Home Safety Plan:** WAP staff and contractors shall review the In-Home Safety Plan with clients prior to entering the home.
- iii. **PPE Requirements:**
 - a. While weatherization workers or contractors are present, WAP service providers shall offer and provide surgical masks to household members as needed.
 - b. While in clients' homes when at least six feet of social distancing is possible, all weatherization workers or contractors shall wear latex or nitrile gloves and surgical masks or respirators rated N95, or equivalent, or better.
 - c. While in clients' homes when at least six feet of social distancing is not possible, all weatherization workers or contractors shall wear latex or nitrile gloves, respirators rated N95, or equivalent, or better and eye protection such as goggles or a face shield. (OSHA Guidance states that OSHA will exercise enforcement discretion and suggests surgical masks and eye protection as an alternative to N95 respirators in cases employers have attempted to acquire N95, or equivalent, respirators; have prioritized N95 respirators to staff most susceptible to contact per CDC guidance; and have implemented other measures in the hierarchy of controls).
 - d. Respirators with exhaust ports are not allowed to be worn in the living space in clients' homes.
- iv. **Cleaning and Disinfecting of High Touch Surfaces:** High touch surfaces, including tools and diagnostic equipment, as well as surfaces in the home, such as light switches, door handles, and faucets that are touched must be cleaned and

disinfected during the site visit. High touch surfaces in vehicles must also be disinfected prior to being driven to and from a client's home.

- v. **Social Distancing:** While in a client's homes, WAP staff and contractors shall maintain a minimum distance of at least six feet between themselves and all household members.
- vi. **Handwashing and Sanitizing:** All WAP staff and contractors shall wash hands using soap and water for at least 20 seconds or sanitize their hands using hand sanitizer with at least 60% alcohol for at least 20 seconds before and after donning and doffing PPE and before entering and after exiting a client's home.
- vii. **Physical Barriers:** Installation of a physical barrier such as a clear plastic sheet or zip wall is not required. However, it is recommended in cases where household members are not able to isolate themselves from WAP workers and where workers occupy an area of the home long enough to make the use of the barrier practical (typically over an hour).
- viii. **Use of Client Hand Washing Facilities:** Every attempt should be made to minimize the use of a client's indoor sink for hand washing. When possible, WAP workers should use portable wash stations, hand sanitizer, or outdoor faucets. Workers must receive verbal permission from clients to use their indoor or outdoor sinks and faucets. Faucets used by workers must be disinfected along with all other high touch surfaces touched by workers during site visits.
- ix. **Use of Client Bathroom Facilities:** Every attempt should be made to minimize use of a client's bathroom by using portable or off-site facilities. Workers must receive verbal permission from clients to use their bathroom facilities. Bathroom facilities used by workers must be disinfected along with all other high touch surfaces touched by workers during site visits. Toilet lids should always be shut prior to flushing.
- x. **Blower Door Testing:** The guidance found in this [position statement](#) published by the Building Performance Association should be followed when performing blower door testing in the time of COVID-19.
- xi. **Tool and Diagnostic Equipment Cleaning and Disinfecting:** All tools and diagnostic equipment touched during the site visit shall be disinfected after leaving the home. The CDC recommends to disinfect electronics with alcohol based products that are at least 70% alcohol. It is strongly recommended that workers do not share tools.

G. Contact Tracing

- i. Per WAP Memo 062: If an employee or contractor tests positive for COVID-19 following weatherization work, WAP organizations should follow [Contact Tracing Protocol](#) outlined by the CDC.

H. Safe Work Practices Resources

White House Guidelines, Opening up America Again:

<https://www.whitehouse.gov/openingamerica/>

WAP Memo 060” <https://www.energy.gov/sites/prod/files/2020/03/f73/wap-memo-060.pdf>

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

Centers for Disease Control (CDC) Website: <https://www.cdc.gov/>

CDC Guidance: When You Can be Around Others:

<https://www.cdc.gov/coronavirus/2019-ncov/if-you-are-sick/end-home-isolation.html>

CDC Guidance: Quarantine and Isolation: <https://www.cdc.gov/coronavirus/2019-ncov/if-you-are-sick/quarantine-isolation.html>

CDC Guidance: Returning from International Travel:

<https://www.cdc.gov/coronavirus/2019-ncov/travelers/after-travel-precautions.html>

CDC Guidance: Reopening Guidance for Cleaning and Disinfecting Public Spaces, Workplaces, Businesses, Schools, and Homes

<https://www.cdc.gov/coronavirus/2019-ncov/community/reopen-guidance.html>

Environmental Protection Agency (EPA) Website: <https://www.epa.gov/>

Occupational Safety and Health Administration (OSHA) COVID-19 Guidance:

<https://www.osha.gov/SLTC/covid-19/>