

March 26, 2020

The Honorable Chad F. Wolf
Acting Secretary of Homeland Security
Department of Homeland Security
Washington, DC 20528

Dear Acting Secretary Wolf:

On behalf of the organizations and suppliers listed below, we write to urge you to consider policy proposals to support the housing sector of the economy during the COVID-19 pandemic. We stand with you during these uncertain times and look to your leadership to help steer the community through uncharted waters. To help stabilize the housing industry and its supply chain in the near term, we ask you to designate construction of single-family and multifamily housing as an “Essential Infrastructure Business.”

As cities and states issue declarations and public health orders as a result of the crisis, it is essential that communities have access to our professionals to build and maintain essential services including: building, plumbing, residential property management, rental housing operators, roofing, electrical, HVAC systems, waste/wastewater treatment plants and power generations. Home construction, including those industries listed above, should be designated as “essential” because it is necessary to maintain safety, sanitation, and economic security.

We encourage you to consider four main factors:

- Recognize that construction of single-family and multi-family housing is essential and should be allowed to continue under a remain in place order;
- Government functions related to the building and development process, such as inspections, permitting and plan review services can be modified to protect the public health, but fundamentally should continue and serve the construction of housing (e.g., allow qualified private third-party inspections in case of government shutdown);
- Supply stores, distributors and manufacturers of building products necessary to serve the construction, repair and maintenance of housing should be allowed to operate; and
- Those working in building trades must be allowed to continue to maintain the essential operation of residences and other operating businesses.

Our industry continues to adhere to public health guidelines set forth by the Occupational Safety and Health Administration (OSHA) and the Centers for Disease Control (CDC). According to OSHA, “Lower exposure risk (caution) jobs are those that do not require contact with people known to be, or suspected of being, infected with SARS-CoV-2 nor frequent close contact with (i.e., within 6 feet of) the general public. Workers in this category have minimal occupational contact with the public and other coworkers.” Guidance on Preparing Workplaces for COVID-19, p.20.

A large majority, if not all land development and residential construction job tasks fall within OSHA’s Lower Exposure Risk jobs. Obviously, working on a new unfinished home site occurs primarily outdoors

and does not involve going onto a location occupied by residents or a public location, and there is minimal (if any) physical or transactional contact with customers compared to other customer/client relationships.

Homebuilding, including remodeling and repair, is highly regulated and therefore cannot occur without support from the locality where it occurs. Builders require governmental approvals and permits to begin a project and they are needed through project completion. Therefore, governmental inspections occur along the entire process from the land development to final certificate of occupancy.

As part of the Essential Infrastructure, residential construction requires that government building and zoning departments continue to operate. Furthermore, for the safety and wellbeing of current and future occupants, governments must allow inspections to occur in a timely manner.

The inspection process may benefit from modifications. For example, if possible, inspectors may work “off hours” to minimize any contact with the construction team. Or they can make other arrangements with the owner or general contractor to safeguard their health by ensuring nobody will be on site during an inspection. Furthermore, certain localities use third-party engineers to sign off on inspections. It may be necessary for home builders to request this option if local governments are closing their building department during the pandemic.

Housing is currently 14.6% of Gross Domestic Product and a major engine of the economy. Keeping the men and women of the industry building must be a priority. If the construction industry and its supply chain is disrupted, it creates a domino effect leading to dire negative economic repercussions for an already-burdened economy.

We, the undersigned, request that you consider construction of single-family and multifamily housing as an essential service, so that individuals may continue to perform work necessary to the operations and maintenance of “Essential Infrastructure.” We appreciate your leadership and the work of your staff and those who are spending every waking hour keeping us safe.

ABC Supply Company
APA – The Engineered Wood Association
American Gas Association
American Subcontractors Association
American Wood Council
Asphalt Roofing Manufacturers Association
Associated General Contractors of America
Association of the Wall and Ceiling Industry
Building Performance Association
Cabinetry by Karman
Carolina Custom Surfaces
Carrier
CCIM Institute
Cornerstone Building Brands
CoConstruct
Council for Affordable and Rural Housing
Danver Stainless Outdoor Kitchens

DalTile Corporation
Demilec
DuPont Building Innovations
Environmental Stoneworks
Extruded Polystyrene Foam Association
Ferguson Enterprises, LLC
Fiberon
Fortune Brands Home and Security
Fypon
GE Appliances, a Haier company
Hardwood Federation
Hearth & Home Technologies
Hearth, Patio & Barbecue Association
House of Rohl
Independent Electrical Contractors
Indiana Limestone Institute of America, Inc.
Installed Building Products
Insulation Contractors Association of America
Institute of Real Estate Management
Interlocking Concrete Pavement Institute
International Door Association
International Surface Fabricators Association
James Hardie Building Products
JELD-WEN Windows & Doors
Kingspan Insulation, LLC
KOHLER Company
Leading Builders of America
Lennox Industries Inc.
LG Electronics USA
LP Building Solutions
Manufactured Housing Institute
MasterBrand Cabinets
Metabo HPT
Moen
Mortgage Bankers Association
National Affordable Housing Management Association
National Asphalt Pavement Association
National Apartment Association
National Association of Affordable Housing Lenders
National Association of Home Builders
National Association of REALTORS®
National Association of the Remodeling Industry
National Concrete Masonry Association
National Demolition Association

National Electrical Contractors Association
National Leased Housing Association
National Lumber Building Materials of America
National Multifamily Housing Council
National Roofing Contractors Association
Natural Stone Institute
North American Insulation Manufacturers Association
Omegaflex, Inc.
Plumbing Manufacturers International
Ply Gem Residential Solutions
Polyisocyanurate Insulation Manufacturers Association
Protective Products Int'l Inc.
Residential Design Services
Resideo
Rockin'teriors
Roof Coating Manufacturers Association
Royal Building Products, a Westlake company
Southeastern Lumber Manufacturers Association
Spray Polyurethane Foam Alliance
The Vinyl Institute
Therma-Tru Doors
Tile Roofing Industry Alliance
Trane
Vinyl Siding Institute
Wellborn Cabinet, Inc.
Whirlpool Corporation
Window and Door Manufacturers Association
Window Covering Manufacturers Association
Zillow Group