

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**

