



Department of Energy Weatherization Assistance Program State Plan

DRAFT

Program Year 2023

Effective April 1, 2023 - March 31, 2023



OKLAHOMA
Commerce

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ANNUAL FILE

Total Program Year 2023 Award¹= \$3,457,447

Previous Program Year 2022 Award = \$3,457,447

SUBGRANTEES

Agency	Formula Allocation	# of Homes
Region 1	\$629,195.00	35
Region 2	\$675,888.00	33
Region 3	\$335,244.00	22
Region 4	\$279,475.00	22
Region 5	\$232,912.00	18
Region 6	\$339,021.00	20
TOTALS	\$2,491,735.00	150

Planned Average Cost Per Unit	\$7,774.47
Estimated Energy Savings (MMBtu)	TBD

IV.1 WAP Production Schedule

Weatherization Plans	Units	
Total Units (excluding reweatherized)	150	
Rewatherized Units	0	
Average Unit Costs, Units subject to DOE Project Rules		
VEHICLE & EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)		
A	Total Vehicles & Equipment (\$5,000 or more) Budget	\$0.00
B	Total Units Weatherized	150
C	Total Units Rewatherized	0
D	Total Dwelling Units to be Weatherized and Rewatherized (B + C)	150
E	Average Vehicles & Equipment Acquisition Cost per Unit (A divided by D)	\$0.00
AVERAGE COST PER DWELLING UNIT (DOE RULES)		
F	Total Funds for Program Operations	\$1,166,170.00
G	Total Dwelling Units to be Weatherized and Rewatherized (from line D)	150
H	Average Program Operations Costs per Unit (F divided by G)	\$7,774.47
I	Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$0.00
J	Total Average Cost per Dwelling (H plus I)	\$7,774.47

¹ Per DOE WPN 23-1: "For planning purposes, until a final full year FY 2023 budget is passed and signed by the President, Grantees should develop their Grantee Plans using the same funding level as the DOE 2022 Appropriated funds outlined in [WPN 22-2](#)."

POLICY ADVISORY COUNCIL MEMBERS

<u>Name of Member</u>	<u>Company</u>	<u>Job Title</u>
Casey Letran	OK Department of Human Services	DHS LIHEAP
Angela Jestice	OK Department of Human Services	DHS LIHEAP
Antonne Cooper	Oklahoma Gas & Electric	Lead Program Manager, Retail Energy
Anna Politano	Oklahoma Association of Electric Cooperatives	Director of Public Relations and Communications
Wanda DeBruler	Oklahoma Association of Community Action Agencies	Interim Executive Director
Mary Jackson	Public Service Company of Oklahoma	EE & Consumer Program Coordinator
Palma Lough	Oklahoma Municipal Power Authority	Member Relations & Training Manager
Ann Politano	Oklahoma Living Magazine, Oklahoma Electric Cooperatives	Director of Public Relations & Communications, OKL Publisher
Crystal LeFlore	One Gas	
Erich Font	Central Oklahoma Habitat for Humanity	
Kara Berst	Chickasaw Nation	COOP
Lillie Keener	WarCon, LLC	
Jennifer Pendley	Oklahoma Department of Emergency Management & Homeland Security	Individual Assistance Specialist
Tsali Smith		

STATE PLAN HEARING

An in-person public hearing (with a virtual option via Zoom) will be held on January 24, 2023 at 1:00 pm.

Public hearing notification will be sent via GovDelivery no later than January 13, 2023, 10 days prior to the hearing to be held on January 24, 2023. ODOC was published on January 9, 2023. Notification of the website article will also be included in the periodic New Pioneer newsletter (ODOC's official newsletter to the public). A copy of the proposed PY23 state plan will be posted on ODOC's website during the entire public comment period of January 9 – 24, 2023.

GovDelivery Public Hearing Notices and copies of ODOC's website/New Pioneer will be attached and submitted with this Plan upon finalization. The public hearing will be recorded, and a link to the recorded video along with the official transcript of the hearing will be attached and submitted with this Plan as well.

CONTACTS

Oklahoma WAP Recipient Business Officer-

Marshall Vogts, Director of Community Development

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Oklahoma WAP Recipient Principal Investigator

Kayla Cornett, Energy Programs Planner

Contact information: email: kayla.cornett@okcommerce.gov or telephone: (405) 215-6240

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STATE BUDGET

	Grantee Admin (ODOC Funds)	Subgrantee Admin	Grantee T&TA (ODOC Funds)	Subgrantee T&TA	Program Ops	H&S	Liability	Financial Audits	Vehicles & Equipment	Total
Personnel	\$115,494.00	\$0.00	\$100,735.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$216,229.00
Benefits	\$57,747.00	\$0.00	\$50,367.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$108,114.50
Travel	\$0.00	\$0.00	\$12,150.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$12,150.00
Equipment	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Supplies	\$0.00	\$0.00	\$2,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$2,000.00
Contract	\$10,000.00	\$306,624.00	\$337,355.00	\$30,000.00	\$1,792,465.00	\$304,718.00	\$17,500.00	\$14,500.00	\$0.00	\$2,813,162.00
Construction	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Other Direct Costs	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Readiness	\$0.00	\$0.00	\$0.00	\$0.00	\$190,066.00	\$0.00	\$0.00	\$0.00	\$0.00	\$190,066.00
Total Direct Charges	\$183,241.00	\$306,624.00	\$502,607.00	\$30,000.00	\$1,982,531.00	\$304,718.00	\$17,500.00	\$14,500.00	\$0.00	\$3,341,722.00
Indirect	\$61,812.00	\$0.00	\$53,914.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$115,725.00
Totals	\$245,053.00	\$306,624.00	\$556,521.00	\$30,000.00	\$1,792,465.00	\$304,718.00	\$17,500.00	\$14,500.00	\$0.00	\$3,457,447.00

MASTER FILE

APPROACH TO DETERMINING CLIENT ELIGIBILITY (V.1.1)

1. WHAT IS THE DESCRIPTION OF INCOME USED TO DETERMINE ELIGIBILITY?

Oklahoma defines eligibility for WAP services at the 200% of poverty level, as defined in the annual WPN 22-3 Poverty Income Guidelines. Once PY 2023 Poverty Income Guidelines are released, Oklahoma will update all documentation, including the State Plan. Oklahoma Subgrantees are required to accumulate 12 months past income documentation to determine client eligibility. If an applicant pulled from the wait list has an application completion date 12 months or older (from the date of planned energy audit), the application must be income recertified and eligibility redetermined. Recertification must be documented on the application. Therefore, no dwelling unit will be weatherized without documentation that the unit is an eligible dwelling unit (notarized self-certification of "no" income allowable).

Per annual WPN 22-3 The Oklahoma Department of Commerce Definition of Income includes language from "income or cash receipts earned or received by the applicant before taxes during applicable tax years, but not the Income Exclusions listed in 21-3 Section C. Gross Income is to be used, not Net Income." ODOC will follow WPN 23-3 when available.

[See Oklahoma Weatherization Operations Manual Requirement 19](#)²

2. WHAT HOUSEHOLD ELIGIBILITY WILL BE USED IN THE PROGRAM?

Oklahoma will use the current DOE weatherization eligibility criteria of 200% of Federal Poverty Guidelines to determine program eligibility. The DOE definition of income will be used to define what constitutes income.

See Oklahoma Weatherization Operations Manual Requirement 20 (single family) and 21 (multifamily) <https://www.okcommerce.gov/wp-content/uploads/Weatherization-Operations-Manual.pdf>

3. WHAT IS THE PROCESS FOR ENSURING QUALIFIED ALIENS ARE ELIGIBLE FOR WEATHERIZATION BENEFITS?

No person shall, on the grounds of race, color, national origin, religion, sex, age, familial status, or disability, be excluded from participation in, be denied benefits of, or be subjected to discrimination under any program, project or activity funded in whole or in part with funds made available by ODOC.

Weatherization Applicants are required to provide either a Social Security Number or residency paperwork to apply for the program. [See Oklahoma Weatherization Operations Manual Requirement 8](#)

² Full link to Weatherization Operations Manual:
<https://www.okcommerce.gov/wp-content/uploads/Weatherization-Operations-Manual.pdf>

APPROACH TO DETERMINING BUILDING ELIGIBILITY (V.1.2)

4. WHAT ARE THE PROCEDURES TO DETERMINE THAT UNITS WEATHERIZED HAVE ELIGIBILITY DOCUMENTATION?

Here are the procedures for Application Processing:

1. Subgrantee agencies shall use the Weatherization Assistance Program Application [Form 23] to determine eligibility of the applicant (which includes income verification).
2. If the applicant has no evidence of income, or no-income, the Subgrantee must collect a Notarized Certification of Zero Income Form from the applicant [Form 34].
3. Supporting Documentation- For purpose of review and audit, each file must contain an application from the client that contains the required demographics and income for the entire family living in the residence. The demographics should include the same information as what is included on the Weatherization DOE Quarterly report (age, disabled, blind, race -Native American, children, high residential energy user, household with high-energy burden) and this data must be collected and included in each client file.
4. If the applicant is eligible, Subgrantee agencies shall prepare a Weatherization Needs Assessment/Priority System [Form 23]. Ineligible applicants must be notified in writing with a Weatherization Denial/Deferral Form [Form 33]. If the initial assessment indicates a need for the applicant to remedy an issue, the applicant must be notified with a Deferral of Service [Form 33].
5. The application should then be reviewed by internal review procedures, selected for service, and prioritized based upon need.
6. Also maintained in the client file is owner and rental documentation

[See Oklahoma Weatherization Operations Manual Requirement 12, 13, 18, 19, 20, and 21](#)

5. READINESS FUNDS

With the release of Readiness Funds in WPN 22-6, ODOC has created policy to help Subgrantees review previously deferred homes and possibly use Readiness Funds to assist that client. In this [policy](#), guidance is provided information on the distribution of funds, maximum cost per home, monitoring and reporting of units, and what is allowable with these funds.

ODOC will also require each Subgrantee to notate on the QCI checklist (Form 44) and a quarterly Readiness Funds spreadsheet will be required to be submitted for those that utilize these funds.

6. WHAT ARE THE PROCEDURES FOR RE-WEATHERIZATION COMPLIANCE?

Subgrantee shall not weatherize a unit which:

1. Any dwelling units weatherized (including dwelling units partially weatherized) under DOE WAP, or under other Federal programs, until the date is 15 years after the date such previous weatherization was completed, from the date of the proposed new energy audit initiation.

2. Subgrantees may not weatherize a unit which is designated for acquisition or clearance by a federal, state or local program within 12 months from the date weatherization of the dwelling unit would be scheduled to be initiated (energy audit).
3. Subgrantees will be required to keep track of all re-weatherized homes on a separate spreadsheet to be submitted to ODOC each quarter, until ODOC has finalized procurement of the new weatherization database software program.

[See Oklahoma Weatherization Operations Manual Requirement 20.3](#)

During the PY 2022 DOE monitoring, a concern was mentioned regarding Oklahoma's re-weatherization policies and whether adequate re-weatherization checks and the current record keeping policies. ODOC will be including a more robust re-weatherization review during Subgrantee monitorings moving forward as well as creating and distributing a re-weatherization report for all Subgrantees to use. ODOC will also be utilizing the newly procured EIS WAPLink database to collect when, or if, a home has been weatherized and provide historical data on whether a home can be re-weatherized. This is still an active concern, but action has been submitted on PAGE in the Assessments portion.

7. WHAT STRUCTURES ARE ELIGIBLE FOR WEATHERIZATION?

Eligible buildings include owner and renter-occupied single-family homes, manufactured homes (mobile homes), and 2-4-unit multifamily units that DOE has approved ODOC to audit using the Single-Family Audit tool and policies.

With written approval from the Oklahoma Department of Commerce, Office of Community Development (ODOC/OCD), Subgrantee agencies may weatherize shelters that comply with the definitions below:

1. Shelter means a dwelling unit or units whose principal purpose is to house, on a temporary basis, individuals who may or may not be related to one another and who are not living in nursing homes, prisons, or similar institutional care facilities;
2. Shelters shall be counted as one (1) unit per each 800 square feet or each floor of the unit shall be considered as one (1) unit;
3. Expenditures to service shelters are limited to twenty percent (20%) of each weatherization contract;
4. Requests to provide services to shelters should include an analysis of the cost/benefit to clients and cost/benefit for energy savings when compared with serving family units.

Historic Preservation: Oklahoma WAP has a signed SHPO Programmatic Agreement (PA) dated 3/29/2010 to remain in effect until December 21, 2020. It has since been extended through December 31, 2030. The PA lists exempt activities/undertakings generally conducted in the process of weatherizing homes through Oklahoma WAP, which have been determined to have no potential to cause effects on historic properties. The OK WAP PA is included in the SF-424 attachments section. [See Oklahoma Weatherization Operations Manual Requirement 22](#)

8. WHAT RENTAL UNITS/MULTIFAMILY BUILDINGS WILL BE ADDRESSED?

Oklahoma has DOE approval to weatherize 2 – 4-unit buildings, using Single Family Audit policies and procedures. Oklahoma is NOT approved to weatherize any small or large multifamily units (5+ unit buildings).

Every Energy Auditor must submit small unit multifamily building (duplexes, three, and four units) audits to ODOC (to the State Tech) for written approval until ODOC determines that an Energy Auditor had demonstrated sufficient mastery of running the multifamily audit and gathering the required supporting documentation.

1. An Energy Auditor must submit all the documentation listed in the [Weatherization Operations Manual](#) Requirement 21.4.1.5. for the energy audit itself. The energy audit documentation must be accompanied by all supporting documentation as listed in 21.4.1.3.
2. Once the State Tech has determined an Energy Auditor had demonstrated sufficient mastery of small multifamily audits, ODOC will provide a letter of authorization to the specific Energy Auditor.
3. Small multifamily audits must be submitted to the ODOC State Tech for approval until a letter of authorization is provided. Authorization is provided only to Energy Auditors, not the Subgrantee.

2–4-unit buildings are eligible to be audited and submitted to ODOC for approval as long as:

Not less than 66 percent (50 percent for duplexes and four-unit buildings) of the dwelling units in the building are eligible, or will become eligible dwelling units within 180 days under a federal, state, or local government program for rehabilitating the building or making similar improvements to the building;

A Subgrantee may weatherize a building containing rental dwelling units where:

1. The Subgrantee has obtained the written permission of the owner or owner's agent;
2. The Subgrantee has established procedures for dwellings consisting of a rental unit or units to ensure that:
 - a. The benefits of weatherization assistance in connection with such rental units, including units where the tenants pay for their energy through their rent, will accrue primarily to the low-income tenants residing in such units;
 - b. For a reasonable period of time, which is defined as a period of three years, after weatherization work has been completed on a dwelling containing a unit occupied by an eligible household, the tenants in that unit (including households paying for their energy through their rent) will not be subjected to rent increases unless those increases are demonstrably related to matters other than the weatherization work performed.

Tenants may file a complaint first with the local Agency then with the Oklahoma Department of Commerce/Office of Community Development if the complaint is not resolved. The owners must

demonstrate that the rent increase concerned is related to matters other than the weatherization work performed; [See [Requirement 27](#) Applicant Appeals]

No undue or excessive enhancement shall occur to the value of the dwelling units. The expenditures allowed under the Weatherization Assistance Program help focus enhancements on those that provide weatherization benefits. For example, repairs to a dwelling unit must be necessary to make the installation of weatherization materials effective.

See [Oklahoma Weatherization Operations Manual Requirement 23.5](#)

ODOC staff will be obtaining Multi-Family Weatherization training during PY 23 and PY 24. At minimum, this training will be attained by ODOC's three Energy Project Specialist and ODOC's Energy Efficiency Quality Assurance Specialist (State Tech). To align with WPN 22-13, ODOC has made it a priority to receive T&TA training for both ODOC staff and Subgrantee implementation. ODOC plans to seek Energy Audit Process Approval on large multifamily units no later than PY 2025.

9. WHAT IS THE DEFERRAL PROCESS?

See **Attachment 1** for the complete Deferral Process.

It is found in [Oklahoma Weatherization Operations Manual Requirement 24](#)

APPROACH TO TRIBAL ORGANIZATIONS (V.1.4)

1. SHOULD TRIBAL ORGANIZATIONS BE TREATED AS A LOCAL APPLICANT?

Low-income members of Native American tribes located within Oklahoma will receive benefits under the Weatherization program equivalent to the assistance provided to other low-income persons in the State unless the applicant has made the recommendation provided in 10 CFR 440.12 (b)(5) which states: "A recommendation that a tribal organization be treated as a local applicant eligible to submit an application pursuant to § 440.13(b), if such a recommendation is to be made"

It should be noted that the number of Native American homes to be weatherized is not evenly distributed among Subgrantees. This is because the Native American population is not evenly distributed across the state.

SELECTION OF AREAS TO BE SERVED (V.2)

Per 10 CFR 440.14(c)(6)(ii): The Weatherization Assistance Program in Oklahoma is available through six (6) local subgrantee Agencies which covers all 77 counties. In the past, not all counties were being serviced with this program due to agencies relinquishing their program and ODOC having difficulty getting other, established agencies to extend their service areas to include the relinquished counties. On November 11, 2022, ODOC released an RFA to the current network and to the public in order to receive bids for the counties. ODOC worked with the current

agencies to create a revised service map that covers all 77 counties and can be found at: <https://odoc.maps.arcgis.com/apps/webappviewer/index.html?id=0f84eac0be9a4d3e88ea9a44aea65195>. New authorized Regional Subgrantees will be notified the week of January 23, 2023.

PRIORITIES FOR SERVICE DELIVERY (V.3)

Per 10 CFR 440.16(b): Priority is given to the following individuals:

- Person(s) age 60 and over
- Disabled
- Families with children 12 years old and younger
- High Residential Energy User
- Households with High Energy Burden

Note: How Applicants are drawn from a waiting list:

1. Applicants are drawn from a waiting list first based on the high priority clients listed above;
2. Following the high-risk client pool, eligible applicants based on income are placed in order of application date;
3. Subgrantees are allowed to choose the oldest application certification date in order to reach high priority clients, within the same high-risk categories.
4. Applications may be selected in order to coordinate weatherization services with another funding source.

CLIMATIC CONDITIONS (V.4)

Oklahoma's source for climatic data is from the National Oceanic and Atmospheric Administration's National Climate Data Center, Climate Services and Monitoring Division. Oklahoma chose to use an average of 20 years (from 1997- 2017).

NOAA reported Oklahoma's 20-year average of cooling-degree days was 1,978 while the 20 year average of heating degree days was 3,501. The calculations are based on 12-month accumulations. A chart of both cooling-degree day averages and heating-degree day averages are available as an attachment. The document is titled- "Cooling and Heating Days."

As Oklahoma is located in the South Region, ODOC sourced data from NOAA for the South Region to compare State averages. According to NOAA the South Region 20-year averages were 2,552 cooling-degree days, and 2,300 heating-degree days. These calculations are also based on 12-month accumulations.

The State has approved specific cooling measures which are determined as cost-effective for Oklahoma's warm climate.

DOE identified that not all Subgrantees were consistently using the correct weather station location. Due to this, Oklahoma has since implemented a weather station list to be listed in Oklahoma's EA Manual. Corrective Action for this Finding has since been resolved.

TECHNICAL GUIDES AND MATERIALS (V.5.1)

All weatherization work in Oklahoma is performed in accordance with 10 CFR 440 Appendix A, and DOE approved ODOC Policies and Procedures for Energy Audits. All Subgrantees are required to follow these energy audit procedures for all single-family units, manufactured homes, and any 2-4 multi-family units, (which are approved to be audited using Single Family procedures). Oklahoma is approved to use the Weatherization Assistant (WA) National Energy Audit Tool (NEAT), and Manufactured Home Energy Audit (MHEA) (Version 8.9). DOE gave conditional re-approval of Oklahoma's Energy Audit Procedures on May 28, 2019. ODOC has implemented the five conditions required by DOE, and DOE provided unconditional approval of Oklahoma's Energy Audit Policies and Procedures on December 3, 2020.

DOE approved the most recent updated Field Guide on June 7, 2021 and will remain valid until June 7, 2026. Subgrantees were required to use and implement the new Guides with all homes that began after July 1, 2018. Hard copy field guides were provided, with a required signature of receipt, to all 11 Subgrantees. Electronic copies of the field guide is available at [here](#).

Oklahoma annually updates policies and procedures when changes are made to DOE programmatic guidance. Subgrantee agreements and vendor contracts align with current DOE guidance and SWS. This includes any updates that may be required after the release of [WPN 22-4](#).

The following language is and will be included in all Subgrantee contracts to outline the expectations for quality of work in crew and contractor weatherization installations, as per WPN 22-4:

1. "The Contractor must meet DOE standards in regard to quality of work in all weatherization installations, as outlined in Weatherization Program Notice 22-4, Section 2. These expectations are, at a minimum, to meet or exceed the standards set forth in the National Renewable Energy Laboratory Standard Work Specifications for Home Energy Upgrades (SWS), available at <https://sws.nrel.gov/>. In addition, Subgrantees are required to include this language in all Agreements, MOU's or contracts entered into with weatherization vendors or subcontractors. The vendor and/or subcontractor will be required to provide a signature on the contract documents with the Subgrantee to verify the expectations for quality of work are understood."

ODOC requires Subgrantees to electronically execute their contract with ODOC, via [OKGrants](#)³, a Grants Management System, prior to the Execution of a WAP contract to ensure the expectations of DOE and ODOC are understood by the Subgrantee and their affiliates.

The type of weatherization work to be done in Oklahoma will include

- installing insulation;
- reducing air infiltration through the application of caulk;

³ <https://grants.ok.gov/Login2.aspx?APPTHEME=OKOSF>

- door sweeps;
- weather-stripping and hole patching;
- replacing/repairing windows and doors (following DOE approved energy audit procedures);
- energy related health and safety measures;
- heating and cooling system safety checks;
- efficiency modifications (such as replacement of heating and cooling systems);
- energy efficiency retrofits;
- clean/repair and/or replacement of electric baseload appliances/fixtures;
- other incidental and necessary energy related repairs and replacements (per DOE approved energy audit procedures).

A lack of sufficient detail on Oklahoma's work orders was identified in the PY 2021 monitoring as well. Since this was identified, ODOC has worked with CHP to provide training on work orders and how these can be generated in NEAT/MHEA. ODOC is still working on complete work order policies and procedures and intends to provide additional T&TA as needed. This Finding has not been resolved, but DOE closed the Finding for PY 2021 and has included it, as a continuation, on the PY 2022 monitoring.

Oklahoma is working on developing a fuel switching policy that will be based off DOE WPN 22-7 that DOE released during PY 2022. Once completed, Oklahoma will be submitting this policy to DOE for review and approval.

FINAL INSPECTION (V.5.3)

ODOC policy (Requirement 45) Assessment, Purchase and Quality Control Inspection states that no unit shall be reported as completed until all weatherization measures have been installed, and the Subgrantee performs a final inspection(s) by a certified QCI who certifies that the work has been completed as required by [10 CFR 440.21](#).

All units reported to DOE are inspected by a certified Quality Control Inspector (QCI). All state monitored units are also to be inspected by a certified QCI. ODOC encourages the network to collaborate with neighboring agencies to provide the QCI service, if staffing is an issue, as a few smaller Subgrantees may not have the staff with the technical knowledge, or the prerequisites, to pass the QCI tests. All QCI inspections will follow WPN 22-4 and any changes that need to occur will be completed.

ODOC requires, in the Weatherization Operations Manual Requirement 37, that all QCIs must receive their Building Performance Institute certification within 12 months of hire and must keep up with their 30 hours of required BPI continuing education units. No QCI may complete final inspections without a BPI certification.

As outlined in Oklahoma Operations Manual Requirement 37, ODOC developed a quality control inspection process in accordance with WPN 22-4 that includes disciplinary actions for inadequate

inspection practices and requires Subgrantees include a description of how the inspector is related to the work in the home, and information on the monitoring requirements based on the separation of duties. If Subgrantees utilize the same weatherization worker for the audit/assessment as the final inspection, ODOC will ensure that at least 10% of completed weatherized homes receive a Quality Assurance Inspection.

Inspection forms will be consistent for all final inspections in Oklahoma WAP, including the EE QA Specialist (Quality Assurance) inspections. Form 44 will be signed by both the local and EE QA Specialist, once the QCI believes the unit meets DOE requirements (see SF 424 attachment Form 44).

ODOC will conduct Quality Assurance Inspections on 5-10% of the State's total annual production (depending on the split between the Subgrantees' auditors and QCI inspectors) and use inspection results to identify the training and technical assistance needs of the network, in partnership with OKACAA.

WPN 22-4 mentions the creation of a QCI Mentorship program. Oklahoma is uncertain on whether this type of program will be implemented during Program Year 2023, but if it is desired, ODOC will reach out to Oklahoma's DOE Project Officer for approval.

WEATHERIZATION ANALYSIS OF EFFECTIVENESS (V.6)

Oklahoma analyzes the effectiveness of the weatherization program on a monthly, quarterly, and annual basis. The Energy Programs Director actively uses her training as a Nationally Certified Results Oriented Management and Accountability Professional to evaluate program outcomes and identify opportunities for continuous improvement.

Energy Program Specialists and the WX Program Manager compare Subgrantee monthly progress reports submitted in OKGrants with each Subgrantee's ODOC approved management plan for the entire program year. Subgrantees who report falling behind on their approved plan must also explain why they fell behind. ODOC keeps record of these explanations and uses them to inform technical assistance opportunities, training needs, and potential policy improvements. For example, in Spring of 2018, ODOC and OKACAA (the OK Weatherization Training Center) collaborated to develop a planning production worksheet for Subgrantee use. It prompted consideration of time factors for planning production such as, holidays, vacation, home energy audit time, classroom training, etc.

If it is determined that a Subgrantee is repeatedly falling behind on production, ODOC will place the Subgrantee on a probationary period as per the Oklahoma Operations Manual, and use the information gathered during the probationary period to inform training and technical assistance needs the Subgrantee might have in order to facilitate their return to good standing.

Throughout the program year, as the State Quality Control Inspector (QCI) completes Quality Assurance Inspections (QA), the WX Program Manager keeps record of all problems found and analyzes for any statewide trends. At the end of each program year, these QA findings are

compiled into a report, shared with Subgrantees and OKACAA. This information is also included in the Subgrantee's Risk Assessment.

In addition to the production plan, monitoring and quality assurance inspections, training and technical assistance needs are also identified by Energy Projects Specialists as a part of administrative/fiscal monitoring, by OKACAA, and by the Oklahoma Weatherization and Housing Advisory Council. ODOC encourages Subgrantees to give feedback on the monitoring process and State Plan policy development throughout the program year.

Annually, a risk assessment is conducted of Subgrantees to determine how effectively a Subgrantee is/has been managing their Weatherization program, and whether monitoring and training/technical assistance might be needed.

HEALTH AND SAFETY (V.7)

ODOC's complete H&S policy ([Requirement 35](#)) is available online the Oklahoma Operations Manual found on our [website](#).

During DOE's PY 21 monitoring of Oklahoma, DOE identified that Subgrantees were not using the appropriate funding categories for certain measures. Since receiving this Finding, ODOC has worked with CHP to ensure policies are current and to provide T&TA to ODOC staff. The new [Weatherization Operations Manual](#) also provides clarification. This Finding has since been resolved.

PROGRAM MANAGEMENT – OVERVIEW AND ORGANIZATION (V.8.1)

The Department of Commerce is organized under Governor Kevin Stitt, and his appointed Secretary of Commerce and Tourism. Brent Kisling serves as Commerce's Executive Director, reporting to the Secretary of Commerce and Tourism. Within the Community Development Division at ODOC, the WAP is managed by a Director of the Division, a Director of Energy and Empowerment Programs, two Energy Programs Planners, an Energy Efficiency Quality Assurance Specialist (technical monitoring), three Energy Projects Specialist (programmatic, administrative, and fiscal monitoring), and will be hiring an Energy Teams Coordinator in 2023. The team is also responsible as a pass through for the LIHEAP program.

All Subgrantee program guidance for the WAP can be found online in the Weatherization Operations Manual (General Management Section, starting on page 24)

In addition:

1. Each Subgrantee is currently a private, nonprofit organization.
2. Each Subgrantee is selected based on public comment received during a public hearing conducted pursuant to Section 440.14(a). Prior to preparation of the final State Plan for submission to DOE, a public hearing was conducted in Oklahoma on January 24, 2023. Members of the public were invited to provide written or oral comments on the Weatherization Assistance Program and proposed changes for PY 23, no less than 10 days prior to the hearing.

3. Subgrantees were invited to attend a virtual and in-person meeting to discuss PY 23 on December 24, 2023, prior to the PY23 public hearing. A recording of this session was sent to our network and included on the Weatherization [website](#).
4. In the selection of proposed Subgrantees, priority was given to CAAs currently operating effective programs. Evaluation of program effectiveness was based on factors such as achievement of past and current goals, quality of workmanship including record keeping, level of preparedness, and the ability of the Subgrantees to secure volunteers. Within the State of Oklahoma, all proposed Subgrantees are entities, which have, and are operating programs under these rules or the Economic Opportunity Act of 1964.

ADMINISTRATIVE EXPENDITURE LIMITS (V.8.2)

Per 10 CFR 440.18(e) and the Consolidated Appropriations Act of 2021 (Pub.L. 116-260), not more than 15% of any grant made to state may be used by the Grantee and Subgrantees for administrative purposes, not more than 7.5% may be used by the state, and not less than 7.5% must be made available to Subgrantees by the state. Oklahoma will provide up to an additional 5% for administrative purposes to those Subgrantees who receive less than \$350,000 of DOE appropriated funds.

MONITORING ACTIVITIES (V.8.3)

Subgrantees and ODOC are collectively responsible for ensuring quality of work. First, all Subgrantees are required to have 100% of all homes weatherized inspected by a BPI Certified Quality Control Inspector, as per WPN 22-4. Second, ODOC also provides additional oversight and monitoring of the program both administratively and technically. The following is ODOC's approach to monitoring.

During DOE's PY 2022 monitoring, a concern regarding Oklahoma's monitoring forms and process was recognized. This concern covered retention requirements, updating ODOC policy to match updated DOE policy, updating the Quality Control Report to include the QCI's BPI number, and reviewing current forms to meet requirements. ODOC is actively revising Oklahoma policies to meet these requirements and will be providing T&TA to Subgrantees. ODOC has also utilized NASCSP for assistance with updating and revising current forms.

ADMINISTRATIVE, PROGRAMMATIC, AND FISCAL MONITORING

There are three (3) Energy Projects Specialist assigned to complete program, fiscal, and administrative monitoring, project management, and training and technical assistance to all Subgrantees.

Annually, in the fourth quarter of each program year, the Energy Projects Specialists conducts administrative, programmatic, and fiscal monitorings (either onsite, virtually via Zoom, or via desktop monitoring) of all Subgrantees (depending on risk assessment score and current pandemic status). Comprehensive monitorings include the following programmatic, fiscal, and administrative reviews.

- financial records
- client files
- inventory
- energy audits (a red flag review – if any red flags are noticed, these files will be given to the technical monitor or a more in-depth review)
- personnel files

Within 30 days after each visit, the Energy Projects Specialists prepares and sends a written report indicating findings and or concerns to the Subgrantee. The Subgrantee has 30 days to respond to all monitoring findings through corrective action. ODOC may ask the Subgrantee to determine their own corrective action plan to meet a requirement or may require a specific corrective action to be implemented after 60 days. If a Subgrantee fails to address a noncompliance finding, it will be reported to the DOE Project Officer. Sensitive or significant noncompliance findings will be reported to the Project Officer immediately.

During PY 2022, the Weatherization Energy Team revised the existing monitoring report in order to improve documentation of the analysis of monitoring reports as per WPN 20-4. ODOC combined historical data, DHS LIHEAP monitoring, and QA monitoring reporting. This allows Oklahoma to provide an agency with a holistic look at their agency, as well as their strengths and places of improvement. ODOC will continue to modify the current monitoring report and monitoring process moving into PY 2023.

TECHNICAL MONITORING

ODOC hired a BPI QCI and EA certified Energy Efficiency Quality Assurance Specialist (EE QA Specialist, State Tech) February 2022. Since then, ODOC has utilized the EE QA Specialist (State Tech) as well as procuring CHP Energy Solutions Research and Training to train and assist the new State Tech in the QA monitoring process. ODOC's QA specialist received training and technical assistance from NASCSP in November 2022. This was to help create a more thorough process and what priorities Oklahoma should keep in mind when completing a QA. NASCSP also worked with the EE QA Specialist to update the QCI Form 44.

ODOC's EE QA Specialist (State Tech) will conduct Quality Assurance monitorings (utilizing same testing and diagnostics as a local QCI) on a minimum of 5% of the DOE-funded units completed, unless the Subgrantee Energy Auditor and QCI positions are held by the same person, then ODOC will inspect a minimum of 10% of all completed units.

The EE QA Specialist (State Tech) will report to the Director of Energy and Empowerment Programs and will work closely with the Energy Projects Specialist in all aspects of the Quality Assurance Process. The EE QA Specialist (State Tech) will take over as lead in providing technical assistance to the WAP network and identifying T&T/A needs of each Subgrantee.

As part of each quality assurance inspection and any client file reviews, the EE QA Specialist (State Tech) will review compliance with ODOC's Policies and Procedures for Energy Audits. EE QA Specialist (State Tech) conducts a blower door test to ensure accurate levels have been reached.

All units are inspected to ensure that those measures installed were installed according to the SWS, ODOC policies and procedures, RRP, and that installations followed the work described in WAP field guides, are consistent with the NEAT Output Report and the BWR/Invoices (materials).

If after inspecting a minimum 5% sampling of work completed and significant deficiencies are discovered (health and safety violations, poor quality workmanship/ installation of materials, major services missed), the Energy Projects Specialists or the EE QA Specialist (State Tech) at ODOC will elevate the number of homes reviewed and the frequency of visitation until the deficiencies are no longer found. The monitoring visits will return to the minimum 5% samplings of the Subgrantees in subsequent visits. The Subgrantee must accomplish the corrective actions(s) and notify the EE QA Specialist (State Tech) and the Energy Projects Specialists of the completion, at which time a visit will be scheduled, or another alternative method of final review will be determined (such as photo documentation with detailed justification the work was completed). Additionally, the EE QA Specialist (State Tech) and/or Energy Projects Specialists may suggest training activities or provide technical assistance to help Subgrantees with consistent deficiencies. ODOC encourages all Subgrantees to attend Oklahoma Weatherization Training Center classes, Oklahoma Weatherization and Housing Advisory Council (OWHAC) meetings, and annual conferences to increase crew qualifications.

MONITORING STAFF BUDGET

The three (3) Energy Projects Specialists will charge time to both the ODOC T&T/A and Administrative budget for personnel and benefits based on the job tasks completed and the time spent on those tasks. Approximately 60% of the EE QA Specialist salary will be paid out of the T&T/A budget (no administrative dollars will be charged). The remaining salary will be paid with DHS LIHEAP funds.

MONITORING SCHEDULE DETAIL AND PLAN

Below is the tentative monitoring schedule for PY 2023 Weatherization Subgrantees and the Oklahoma Association of Community Action Agencies. All of these scheduled monitorings include administrative, programmatic, and fiscal monitoring. These monitorings may be onsite or desktop depending on the risk assessment and/or the public health situation. Technical monitoring schedules are completed based on agency production schedules, but at least one (1) quality assurance visits will happen at the same time as the administrative, programmatic, and fiscal monitoring per the schedule below (pending monitoring plan for BIL):

- Region 1- February 2024
- Region 2- February 2024
- Region 3 – March 2024
- Region 4 – February 2024
- Region 5 – February 2024
- Region 6- February 2024
- Oklahoma Association of Community Action Agencies (OKACAA) – March 2024

Any major findings from Subgrantee monitoring visits, Quality Assurance inspections, and financial audits will be tracked to the final resolution. The Oklahoma Department of Commerce will create a tracking record that includes the: findings, success stories, recommended corrective actions, deliverables, due dates, responsible parties, actions taken, and final resolutions.

PROCESS FOR DISCIPLINE AND/OR REMOVAL OF SUBGRANTEE FROM PROGRAM

The Subgrantee has 30 days (or until the provided due date) to respond to all monitoring findings through corrective action. Monitoring reports remain open and unresolved until all corrective action implementation has been verified. If a Subgrantee fails to respond to an ODOC monitoring finding of any kind or refuses to implement some or all corrective action required within the allowed timeframe, ODOC will provide one written reminder to the Subgrantee detailing the outstanding response that is needed to close the monitoring. If the Subgrantee again does not respond or corrective action is not satisfactorily implemented within the given timeframe, ODOC will take the following action:

1. Place the Subgrantee on 60-day probationary period and withhold any further disbursement of funds.
2. Send final notice to the Subgrantee's Board President and Executive Director explaining that if corrective action is not implemented within the 60-day probationary period, ODOC will terminate the Subgrantee's current weatherization contract and all subsequent ODOC weatherization contracts for a period of at least 2 years. This termination may also include repayment of any weatherization costs that were not satisfactorily resolved.
 - a. This final notice will also remind the Subgrantee of their rights and ensure they are aware of their contractual right to dispute any grievances through a state administrative procedure.
 - b. When the program is open for bid in the future, the Subgrantee may submit a bid to provide services again.
3. Should the Subgrantee resolve the monitoring findings within the probationary period, ODOC will remove the probationary status, but the Subgrantee will remain a high-risk Subgrantee and be placed on reimbursement only for at least one program year. All high-risk agencies automatically have additional oversight and monitorings.
4. If a Subgrantee fails to resolve the monitoring findings, ODOC will send notice of program termination to the Subgrantee's Board President and Executive Director.

In the event that a Subgrantee has repeat monitoring findings two years in a row, even if monitoring findings are resolved satisfactorily within the allowed timeframe, ODOC will take the following additional action:

1. Notify the Subgrantee that they have been placed on a reimbursement only status as part of monitoring corrective action effective for one year starting 30 days from their monitoring report date.

- a. The Subgrantee's reimbursement only status will remain until the next monitoring reflects no repeat findings.
 - b. Should the repeat findings be found again a third time, ODOC will convene an internal ODOC review committee and consider program termination following Steps 2 – 3 below.
2. If the repeat monitoring findings involve questioned or disallowed costs, the Subgrantee will be notified that they are being placed on a probationary period for the remainder of any current contracts, in addition to being placed on a reimbursement only status. The Subgrantee will be asked to submit a letter explaining why they had repeat monitoring findings, what is being done to correct the issue so that it does not occur again, and why they should continue to operate the program.
 3. After receipt of the Subgrantee letter, ODOC will convene an internal review committee to review the nature of the monitoring findings and the Subgrantee's letter to determine whether program termination is necessary due to continued poor performance.

Additional information can also be found in the [Weatherization Operations Manual, Requirements 47, 48, and 49.](#)

TRAINING AND TECHNICAL ASSISTANCE APPROACH AND ACTIVITIES (V.8.4)

Oklahoma utilizes T&TA funds to maintain or increase the efficiency, quality, and effectiveness of the Weatherization Program at all levels. Staff may not function unsupervised until training and certification requirements are met. Please see Requirements 42, 43, and 44 in the [Weatherization Operations Manual.](#)

In order to plan for upcoming program year training needs, ODOC utilizes network surveys, network roundtable discussions with the Oklahoma Weatherization and Housing Advisory Council (OWHAC), ODOC monitoring results from DOE, feedback from ODOC's Project Officers, internal state audits (should any be present), monitoring of Subgrantees, any IG reports (if applicable), and ASCI feedback for both Subgrantees and ODOC Staff ODOC contracts a portion of training and technical assistance, to the Oklahoma Association of Community Action Agencies (OKACAA). OKACAA is an IREC accredited training center and provides Comprehensive and Specific trainings (on the required JTAs for Quality Control Inspector (QCI) Certification, Retrofit Installer, Crew Leader, and Energy Auditor, along with other required H&S trainings) for all weatherization staff in our Oklahoma network. Subgrantees may also receive DOE allowable training at any other IREC training center in the nation. OKACAA tracks all Subgrantee IREC and lead training certifications received from their training center and reports to ODOC quarterly to ensure maintenance of certifications and to determine further training needs.

There are eleven (11) BPI certified QCIs among the six (6) Subgrantees. OKACAA has one BPI certified QCI on staff. ODOC also employs a QCI – for a total of eight (8) QCIs available to the network. ODOC requires that Subgrantees upload their QCI certification(s) with each grant

application. The 2023 training plan for Oklahoma weatherization is below. Additional trainings will be scheduled as required by ODOC.

PY23 TRAINING PLAN

Below is a list of trainings in development (either by ODOC or by ODOC in partnership with OKACAA). Subgrantee attendance is mandatory only for comprehensive and specific training as per our [Requirement 42 and 43](#). ODOC Staff is encouraged to attend at least 1 national conference.

SUBGRANTEE

- EIS WAPLink Database
- Justice 40
- Racism
- Fraud
- Wx Operations Manual Training (year long series)
- Program Manager Training for New Program Mangers
- Time Management
- NEAT/MHEA Training Based on Field Observations (during in-progress or quality assurance inspections)
- ODOC Policies and Procedures
- Energy Audit Field Mentoring Program, which would include an Oklahoma state specific certification for all Energy Auditors
- HVAC Training
- Client Education and Customer Satisfaction
- Program Outreach
- Burnout
- Agency Self-Assessment of Program Capacity
- Application and Wait List Discussion Streamlining and Optimizing Technology in Weatherization
- Management of ACPUs and Production Plans
- Field Guide and Updated SWS 2021 Training – Mobile Home and Site Built
- Financial training (I.e. 2 CFR 200)
- Management training (i.e. 10 CFR 440)
- Conferences
- Comprehensive Training:
 - QCI
 - Energy Auditor
 - Crew Lead
 - Retrofit Installer/Technician
- ASHRAE

- Renovate Right Procedures
- Mold/Moisture
- Asbestos
- Health and Safety

ODOC STAFF

- NASCSP Conferences
- Energy Out West
- Home Performance Coalition
- Any Qualified BPI Continuing Education for ODOC's Energy Efficiency Quality Assurance Specialist
- CHP Training for Non-Technical Program Monitor and Manager Staff on Reviewing Energy Audits

WORKFORCE CREDITONALS

Annually, ODOC requires all Subgrantees to upload a Training Plan (required in WPN 22-4), which includes identification of all staff positions, training and workforce certification verification, and self-identified training needs (see SF 424 for a copy of the PY2023 required form). These training plans are monitored by Energy Projects Specialists and/or the Energy Programs Planner twice annually – once during Subgrantee application submission and once during monitoring. Any Subgrantees found to not be meeting training requirements will be held accountable, including, but not limited to, a probationary period or payback of funds spent on homes. ODOC does not currently track any local contractor licensing or vendor certifications, but has recently procured EIS, WAPLINK database system. This will provide the ability for ODOC to monitor and remind agencies of upcoming needed trainings. This will also allow ODOC to have a better understanding on whether the agencies are following all training requirements for their staff members.

ODOC will be hiring an Energy Programs Coordinator in 2023. This position will work directly with WAP workforce and collecting essential data. This data will help provide Oklahoma with the necessary information to best service the State's clients and increase weatherization workforce across the state. This will be critical with additional BIL funding.

SUBGRANTEE PRODUCTIVITY

Subgrantee Productivity will be monitored monthly and on a quarterly basis (Program Narrative and Quarterly Report).

1. In any given month evaluation of desk monitoring activities, which includes the review of expenditure reports and program narratives, ODOC may implement corrective action or require training and technical assistance of the Subgrantee. Corrective action will be initiated by a Subgrantee missing the approved Production Schedule and Management Plan.
2. If in 30 days, the Subgrantee has not accomplished the recommended plan of action ODOC will recommend a probationary period.

Probationary Period: During the probationary period (length to be determined by ODOC and dependent upon need), the Subgrantee must submit in writing to ODOC the following:

1. What the problem(s) continue to be.
2. What has been done to correct the problem
3. The number of units completed to date, and the number remaining to be completed.
4. Description of the Subgrantee's plan of action to correct the problems, including a timeline for each activity.
5. A list of Identified T&T/A needs.
6. A revised management plan and/or budget (if required).

At the end of probation, if all corrective actions have been accomplished and the production schedule is being met, no further action will be required. ODOC will continue to evaluate through the desk monitoring process.

If at the end of probation, more corrective actions are needed, ODOC could decide to de-obligate funding and at ODOC's discretion redistribute that money among other Subgrantees. To receive redistributed funds, Subgrantees must submit written justification to ODOC describing ability to complete additional units and expend funds, upon notification of availability.

CLIENT EDUCATION

Client education is required anytime a H&S issue is noted in a home, during weatherization work as appropriate, and for each QCI closing out a WAP home. All client education is documented in the client file on Form 25. In PY 2019, ODOC developed a new standardized Client Education H&S Booklet for all Subgrantees to use. The network trains regularly on the importance of client education for not only H&S safety factors, and equipment maintenance, but also for changing behavior in households in order to reduce energy usage, in order to receive the full effects of the weatherization installations.

See SF-424 for copy of H&S Booklet.

ENERGY CRISIS PLAN (V.8.4)

Oklahoma will not develop an Energy Crisis Plan for PY 2023. During the PY 2021 Virtual Input Session, there was Subgrantee interest in ODOC developing an Energy Crisis Plan in future program years.

Per WPN 12-7 Revised Guidance on Disaster Relief planning, Oklahoma Subgrantees are allowed to utilize weatherization funds to assist eligible weatherization clients in various cleanup efforts or repairs, as long as the repairs/clean up are tied to weatherization work performed, including previously weatherized units if the original weatherization was conducted prior to October 1, 1994. In addition, dwelling units located in a disaster area may be considered a priority if the unit that is eligible meets one of the priorities established in regulation, is free and clear of any insurance claim, or form of compensation resulting from damage incurred from the disaster.