



Weatherization Energy Auditor Client File Photo Requirements Update

ODOC Weatherization Program Notice 22-3
Issued February 17, 2022

To: All ODOC Subgrantees/Weatherization Program Service Providers - Executive Directors and Weatherization Program Managers and the Oklahoma Association of Community Action Agencies' Training Center

From: Amanda Marcott-Thottunkal, Senior Energy Programs Manager

Regulations: [DOE WPN 19-4](#); [10 CFR 440.21](#)

Purpose: To revise the client file photo/energy auditor photo requirements as directed by DOE as part of the technical desktop monitoring corrective action.

Implementation Date: April 1, 2022

This Program Notice supersedes any ODOC Guidance in the CAA Manual, Contract Part II, or the Energy Audit Manual.

Regulatory Background

[10 CFR 440.21](#) requires that all Grantees submit, every five (5) years, their energy audit policies and procedures to the U.S Department of Energy (DOE) for approval. DOE explains the submission process in more detail in [DOE WPN 19-4](#). As part of their Energy Audit Reapproval process, DOE requests some photos of the audited home be submitted. Furthermore, DOE requires that ODOC maintain technical and programmatic oversight of the program ([WPN 20-4](#) and [WPN 22-4](#)), and ODOC is unable to do this without client file photos since ODOC is unable to visit every single home on-site. Good photos document a home at the time of the audit, deferral, or weatherization to support the Subgrantee's documentation and minimize misunderstandings or disagreements that may arise on the quality of work completed.

Program Guidance

1. An Energy Auditor must collect sufficient photo documentation of the home, including, but not limited to:
 - i. Exterior views of every wall of the home
 - ii. Legible photos of manufacturer's tags for heating, cooling and

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- domestic hot water appliances.
 - iii. Photos of the diagnostic test results, including combustion analysis, fridge metering, blower door and duct blaster.
 - iv. Only those pressure pans with an unusually high reading need to be photo documented.
 - v. Photos of **pre-existing**¹ wall insulation being investigated.
 - vi. Photos of attic area including attic insulation being measured.
 - vii. Photos of pre-existing floor insulation**²
 - viii. Photos of crawlspace area including height, crawlspace entrance, and crawlspace joistsize.
 - ix. Photo of the existing condition(s) for any other item that is being installed or repaired.
 - x. Photos of building degradation, disrepair, or any building preexisting condition that may result in a deferral**³
 - xi. Any health and safety issue to be addressed by weatherization.
2. ODOC will increase client file desktop monitoring in PY22 to review compliance with photo requirements. Failure to meet requirements may lead to disallowed costs.
 3. The ODOC Policies and Procedures for Energy Audits (Section 2.1.4) will be updated to reflect the changes above for PY2022 and this Program Notice will be archived at that time.
 4. Should there be any questions about this Weatherization Program Notice, please contact the Senior Energy Programs Manager – Amanda Marcott-Thottunkal at amanda.marcott-thottunkal@okcommerce.gov.

¹ New clarification

² New addition

³ New addition