



Client File Documentation and Reporting Requirements Update

ODOC Weatherization Program Notice 23-7 Issued December 14, 2023

To: All ODOC Subgrantee Regional Weatherization Service Providers, CAA Executive

Directors, CAA Chief Financial Officers, and Regional Weatherization Program

Service Area Managers

From: Amanda Marcott-Thottunkal, Director of Energy and Empowerment Programs

Regulations:, <u>10 CFR 440.24 – Recording Keeping</u>, <u>10 CFR 440.25 – Reports</u>, <u>ODOC Weatherization</u> Manual, DOE Weatherization Program Notice 10-08

Purpose: To provide an update to Regional Weatherization Service Providers regarding the use of Weatherization Assistance Program for DHS LIHEAP, DOE WAP, and DOE BIL funds concerning operation procedures relevant to the Oklahoma Weatherization Assistance Programs. Specifically, WPN 23-2 provides new requirements for client file documentation and reporting for DHS LIHEAP, DOE WAP, and DOE BIL.

Implementation Date: Effective November 1, 2023, for DOE WAP and DHS LIHEAP and retroactively effective for all DOE WAP BIL reports due since October 1, 2023. This guidance will remain in effect until further ODOC notice.

This Program Notice supersedes ODOC WPN 23-4 and supplements the current ODOC Manual Sections 12, 13, and 41. Should anything in this Program Notice conflict with any Weatherization Program Operations Manual Requirement, this Program Notice will supersede and take

Regulatory Background

Weatherization programs are required to implement weatherization under strict guidelines/procedures to ensure safe and effective installation of weatherization products and work specifications as well as meeting the operational requirements found in all ODOC manuals

and policy on the work they are contracted to do in support of their weatherization program.

To accomplish effective implementation of ODOC policy and procedures, Regional Subrecipients, along with the support and partnership of ODOC, must be proactive and diligent in engaging in organizational tracking of client file documents (i.e., job numbers), paperwork/data management, and regular progress reporting of data and narratives on unit/home production and other requirements.

This guidance will provide Oklahoma Regional Weatherization Subrecipients with the information needed to number client files and meet reporting requirements. OWPN 23-6 and DOE are sensitive to the client's confidentiality by establishing a coding system that is only accessible to staff in the weatherization program.¹

Program Guidance

CLIENT FILE

- Client files may be kept electronically or in hard copy form. However, both types of client files must comply with either Requirement 12 or 13.¹
- 2. The Subgrantee must maintain separate client files for each funding source contract (DOE WAPBIL, WAP, and DHS LIHEAP WX)
- 3. The Subgrantees must update the job number for all client files (DOE WAP, DHS LIHEAP, and DOE BIL) and must use the new format. The updated job number for DOE, DHS LIHEAP, and DOE BIL will include adding letters (M=mobile, S=site built, and MF=multi-family) as well as the letters PL for Priority List at the end of each job number notating the type of home a job is.
- 4. All client files must be identified by a job number. The job number may be up to sixteen characters in length and comply with the following format:
 - 4.1. DOE or DHS LIHEAP WX

 ___ Funding Source (DOE or DHS), __ Program Year (last two digits of the year), __
 _ First Letters of County, _ _ Sequential Job Number of the home/unit to be weatherized this program year (fill in blanks with leading zeros), _ Type of Unit (Mobile=M, Site Built=S, Multi Family=MF) -PL (include this if a priority list is used instead of an audit).

¹ 200 CFR 200.335

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4.2. WAP BIL Job Number

___Funding Source (BIL), __ Calendar Year (last two digits of the calendar year), ___ First Letters of County, ___ Sequential Job Number of the home/unit to be weatherized this program year (fill in blanks with leading zeros), Type of Unit (Mobile=M, Site Built=S, Multi Family=MF) -PL (include this if a priority list is used instead of an audit)².

4.3. Examples of Job Numbers:

DOE23CLE001M [DOE 23 Funds, Cleveland County, 1st home for all service area (not for a specific county) to be completed this PY, Mobile Home]

DHS24OKL050S [DHS 24 Funds, Oklahoma County, 50th home for all service area (not a specific county) to be completed this PY, Site Built]

BIL23OKL001S-PL [BIL 23 Funds, Oklahoma County, 1st home for all service area (not for a specific county) to be completed this PY, Site Built completed with priority list]

BIL24OKL150M [BIL 24 Funds, Oklahoma County, 150th home for all service area (not for a specific county) to be completed this PY, Mobile Home]

DOE24GAR050MF-PL [DOE 24 Funds, Garvin County, 50th home for all services areas (not for a specific county) to be completed this PY, small multi-family completed with priority list]

- 5. Starting with each new client file/energy audit after the start date:
 - 5.1. October 1, 2022 September 30, 2023: BIL22
 - 5.2 October 1, 2023 September 30, 2024: BIL23
 - 5.3. October 1, 2024 September 30, 2025: BIL24
 - 5.4. October 1, 2025 September 30, 2026: BIL25
 - 5.5. October 1, 2026 June 30, 2027: BIL26

RESOURCES

10 CFR 440.24 – Recording Keeping 10 CFR 440.25 – Reports

ODOC Weatherization ODOC Weatherization Operations Manual Bipartisan

Infrastructure Law Technical Assistance Guide LIHEAP Guidance

Attachment 37

Attachment 38

² Note, priority list policy is forthcoming, but not yet available as of the time of this OWPN.