



Weatherization Assistance Program

2022 Draft State Plan

Published January 2022

DEPARTMENT OF ENERGY WEATHERIZATION ASSISTANCE PROGRAM STATE PLAN

DRAFT

Program Year 2022

Effective April 1, 2022 – March 31, 2023

DRAFT

TABLE OF CONTENTS

ANNUAL FILE	3
SUBGRANTEES	3
POLICY ADVISORY COUNCIL MEMBERS.....	3
STATE PLAN HEARING	4
CONTACTS.....	4
STATE BUDGET.....	5
MASTER FILE.....	6
APPROACH TO DETERMINING CLIENT ELIGIBILITY (V.1.1)	6
APPROACH TO DETERMINING BUILDING ELIGIBILITY (V.1.2).....	8
APPROACH TO TRIBAL ORGANIZATIONS (V.1.4)	13
SELECTION OF AREAS TO BE SERVED (V.2).....	13
PRIORITIES FOR SERVICE DELIVERY (V.3)	14
CLIMATIC CONDITIONS (V.4)	14
TECHNICAL GUIDES AND MATERIALS (V.5.1)	14
ENERGY AUDIT PROCEDURES (V.5.2).....	16
FINAL INSPECTION (V.5.3)	16
WEATHERIZATION ANALYSIS OF EFFECTIVENESS (V.6).....	19
HEALTH AND SAFETY (V.7).....	20
PROGRAM MANAGEMENT – OVERVIEW AND ORGANIZATION (V.8.1)	20
ADMINISTRATIVE EXPENDITURE LIMITS (V.8.2).....	22
MONITORING ACTIVITIES (V.8.3)	23
TRAINING AND TECHNICAL ASSISTANCE APPROACH AND ACTIVITIES (V.8.4)	26
ENERGY CRISIS PLAN (V.8.4).....	29

ANNUAL FILE

Total Program Year 2022 Award¹= \$3,271,910

Previous Program Year 2021 Award = \$3,271,910

SUBGRANTEES

<u>Agency</u>	<u>Formula Allocation</u>	<u># of Homes</u>
Community Action Agency of Oklahoma City	\$481,694.00	50
Community Action Development Corporation	\$203,344.00	17
Community Action Resource & Development	\$251,648.00	20
Community Development Support Association	\$163,785.00	16
Delta Community Action Foundation	\$77,706.00	10
Great Plains Improvement Foundation	\$72,894.00	7
INCA Community Services	\$60,137.00	8
KI BOIS Community Action Foundation	\$158,662.00	17
LIFT Community Action Agency	\$212,542.00	28
Northeast Oklahoma Community Action Agency	\$196,303.00	18
TBD – Unknown # of agencies will receive funds to serve the current 10 unserved counties	\$593,492.00	60
TOTALS	\$2,472,907.00	251

Planned Average Cost Per Unit	\$7,331.67
Estimated Energy Savings	7,354 MMBTUs

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

¹ Per DOE WPN 22-1 "Currently, WAP is operating under a Continuing Resolution (CR) for Fiscal Year (FY) 2022. For planning purposes, until a final full year FY 2022 budget is passed and signed by the President, Grantees should develop their Grantee Plans using the same funding level as the DOE 2021 Appropriated Funds outlined in WPN 21-1."

Teri Green	ONE Gas	Manger – Energy Efficiency Programs
Erich Font	Central Habitat for Humanity	Project Manager of Critical Home Repair
Amanda Ewing	Oklahoma Association of Community Action Agencies	Executive Director
Jennifer Pendley	Oklahoma Department of Emergency Management & Homeland Security	Individual Assistance Specialist

STATE PLAN HEARING

An in-person public hearing (with a virtual option via Zoom) will be held on January 19, 2022 at 1:00 pm.

Public hearing notification will be sent via GovDelivery on January 5, 2022, 13 days prior to the hearing to be held on January 19, 2022. On January 5, 2022, ODOC published notification on its website. Notification of the website announcement is also included in the periodic New Pioneer newsletter (ODOC’s official newsletter to the public). A copy of the proposed PY22 state plan will be posted on ODOC’s website during the entire public comment period of January 6 – 19, 2022.

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, transcribed by a court reporter, will be attached and submitted with this Plan as well.

CONTACTS

Oklahoma WAP Recipient Business Officer-

Marshall Vogts, Director of Community Development

Contact information: email: marshall.vogts@okcommerce.gov, or tel: (405) 815-5339.

Oklahoma WAP Recipient Principal Investigator

Amanda Marcott-Thottunkal, Senior Energy Programs Manager

Contact information: email: Amanda.Marcott-Thottunkal@okcommerce.gov or tel: (405) 239-0688

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	\$127,117.00	\$0.00	\$129,000.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$256,117.00
Benefits	\$63,559.00	\$0.00	\$64,500.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$128,059.00
Travel	\$0.00	\$0.00	\$10,050.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$10,050.00
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	\$9,928.00	\$307,050.00	\$303,305.00	\$33,000.00	\$1,740,248.00	\$259,911.00	\$17,500.00	\$14,500.00	\$100,000.00	\$2,785,442.00
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
Total Direct Charges	\$200,604.00	\$307,050.00	\$508,855.00	\$33,000.00	\$1,740,248.00	\$259,911.00	\$17,500.00	\$14,500.00	\$100,000.00	\$3,181,668.00
Indirect	\$44,789.00	\$0.00	\$45,453.15	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$90,242.00
Totals	\$245,393.00	\$307,050.00	\$554,308.00	\$33,000.00	\$1,740,248.00	\$259,911.00	\$17,500.00	\$14,500.00	\$100,000.00	\$3,271,910.00

MASTER FILE

Please note that the Oklahoma Department of Commerce will be introducing a new program policy and procedures manual entitled – Oklahoma Weatherization Operations Manual (OK WX Ops Manual) and will no longer be using the Community Action Agency Implementation Manual. All policies and procedures will be separate from the Community Services Block Grant program. During this transition period, this Master File will include the entire new policy (or the same policy that was formerly just referenced as in the CAA Manual). The new OK WX Ops Manual will not be available until after April 1. All referenced forms are available upon request.

APPROACH TO DETERMINING CLIENT ELIGIBILITY (V.1.1)

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

1. During the application process, Subgrantees must review the income supporting documentation for each household and determine whether the applicant household is eligible through at least one of the following methods:
 - a. **Subgrantee Eligibility Determined.** Review each application to verify a household (the applicant and all occupants over the age of 18) are at or below 200 percent (200%) of the poverty level (200% Poverty Tables will be available and attached to this policy once available for PY22). Qualified supporting income documentation, which must be kept in the client file, includes, at a minimum:
 - i. At least 3 months (or more) of income supporting documentation (from the past applicable tax year) (see Section 5 for a list of eligible income documentation), annualized (see Section 3 for description of how to “annualize income”).
 - ii. 12 months of actual income documentation.
 - b. **Eligibility Determined by an Outside Agency/Program.** If an applicant has been determined eligible for another government or state low-income family program and can produce supporting documentation verifying their qualification for this program within the last 12 months, a Subgrantee may accept any document used to determine eligibility as evidence of client eligibility for the WAP program. This third-party eligibility documentation must be kept in the client file. Here is a list of programs currently allowed:
 - i. Low Income Home Energy Assistance Program – Utility Assistance
 - ii. U.S. Department of Housing and Urban Development – Section 8 or Public Housing
 - iii. Social Security Act, Title IV – Grants to States for Aid and Services to Needy Families with Children and for Child Welfare Services
 - iv. Social Security Act Title XVI – Supplemental Disability Security Income

- v. HUD means-tested programs are categorically income eligible. Certification that applicants have met the income requirements
 - c. **Self-Certification.** Once all avenues of documenting income are exhausted, self-certification is allowable. A notarized statement signed by the potential applicant indicating that the applicant has no other proof of income must be kept in the client file [Form 34].
2. **Annualization of Income.** Where an applicant cannot provide income verification for the entire 12 months of an applicable tax year, their partial income and supporting documentation (minimum of 3 months) may be annualized to determine eligibility.
- a. Applicant must provide at 3 months of qualified supporting documentation (see Attachment B).
 - b. Subgrantee calculates as follows:

$$12 \text{ months} / \text{ ______ } \text{ months of documentation} = \text{multiplier}$$

$$\text{multiplier} \times \text{sum of income provided} = \text{annualized income}$$
3. **Income Recertification.** An applicant must be re-certified every 12 months (from date of energy audit), if eligibility lapses due to the length of time the applicant was waiting to receive Weatherization services. Recertification must be documented on the application [Form 22], by either
- a. Writing in the new verified income and referencing the new supporting documentation with a staff initial and date OR
 - b. Verifying previous income is still current with a staff initial and date.
- It is not necessary for a Subgrantee to have the applicant complete a new application simply for the purposes of income recertification. A new application is only necessary when the application has been updated for other policy reasons.
4. **Qualified Supporting Documentation.**
- a. Bank Statements,
 - b. Paycheck Stubs,
 - c. Receipts from a Person's own Business or from an Owned or Rented Farm after Deductions for Business or Farm Expenses,
 - d. Check stubs from certain court ordered payments or federal or state programs,
 - e. Royalty statements,
 - f. Estate or Trust Receipts,
 - g. Lottery Winnings documentation,
 - h. Retirement Check stubs

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

See response to Question 1, the same policy is used for both household and client eligibility.

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.

APPROACH TO DETERMINING BUILDING ELIGIBILITY (V.1.2)

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

1. Subgrantee shall use the Weatherization Assistance Program Client Application **[Form 22]** to determine eligibility (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. Each file must contain a current application (within the last 12 months from the date of energy audit initiation) from the client that contains the required demographics and income for the entire family living in the residence. The demographics must include the same information as what is included on the Weatherization Department of Energy 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 determined to be income/household eligible, Subgrantees shall prepare a Weatherization Needs Assessment/Priority System **[Form 23]**. Ineligible applicants must be notified in writing with a Weatherization Denial **[Form 24]** /Deferral Form **[Form 33]**. All deferred applicants must follow ODOC's deferral policy. 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 must then be reviewed by internal review procedures, selected for service, and prioritized based upon need using the assigned priority points.
6. Subgrantees must ensure that the homeowner sign authorization for weatherization, either as the Occupant **[Form 30]** or as providing permission for the Tenant (as the Renter) to receive the services. **[Form 29]**

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

Subgrantees may not re-weatherize any unit except for the following:

1. When a dwelling unit has been damaged by fire, flood or an Act of God and repair of the damage to weatherization material is not paid for by insurance; AND
2. 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.

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).

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.

6. 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 ODOC (who will also seek DOE approval), Subgrantees 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, which expired December 31, 2020. It was recently 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.

7. 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 shall not weatherize any larger multifamily units (5+ unit buildings), nor does Oklahoma have any DOE approved multifamily energy audit policies and procedures to do so.

Every energy auditor must receive ODOC written preauthorization on the energy audit and income documentation for any small multifamily unit buildings (duplexes, three, and four units) prior to beginning any work on the home, until ODOC has determined competency of the energy auditor and the Subgrantee in completing small multifamily units. 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 **[Form 29]**;
2. The Subgrantee has gathered supporting documentation 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 Community Action 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. All Subgrantees are required to maintain a weatherization client and applicant appeals procedures.

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.

8. WHAT IS THE DEFERRAL PROCESS?

Deferring work on a home is a difficult, but sometimes a necessary decision. This does not mean that assistance will never be provided, but that work must be postponed until the problems can be resolved by the applicant or client and/or alternative sources of help are found. Subgrantees, which includes crews and contractors, are expected to pursue options on behalf of the applicant or client, including referrals, and to use reasonable judgment in dealing with difficult situations. Subgrantees should review Health and Safety and resolve any allowable Health and Safety issues

that are identified in a client home, provided they are within their budget. A list of possible program referrals is provided under *V. References*.

This deferral policy provides general requirements and situations for deferral and most situations can be guided by this policy. However, it is possible that unique conditions will arise that are not specifically outlined here. Subgrantees should contact their ODOC liaison for assistance, before deferral, as appropriate.

1. CATEGORIES OF DEFERAL/DENIAL

- A. In general, three situations require a denial or deferral. All three situations require that the applicant or client be notified in writing using the Weatherization Denial Letter **[Form 24]** or Deferral Form **[Form 33]**
 - a. An applicant or unit determined to be ineligible for the program must be denied. For example, an applicant may be over income.
 - b. An initial assessment may indicate the need for an applicant or client to remedy a health and safety issue. These applicants or clients should be deferred until documentation can be provided to the Subgrantees that the situation identified has been remedied.
- B. If during the course of weatherization work, a previously unidentified health and safety issue is now identified, Health and Safety requirements must be adhered to. In some cases, this might mean that weatherization work must cease until the client can resolve the issue by providing documentation to the Subgrantee Recipient of the resolution.

2. DATA TRACKING

- A. The Subgrantee Recipient is required to track the following data on both denials and deferrals for DHS in OKGrants.
 - i. Applicants that did not meet income eligibility requirements.
 - ii. Applicants or clients whose homes are not safe to weatherize, and corrections to make the home safe were outside the scope of Requirement 307.
 - iii. Applicants or clients whose homes need repair work beyond the scope of the program.
 - iv. Applicants or clients whose homes needed more health and safety work done than the Subgrantee budget allowed.
 - v. Any other reason a home is deferred, or an applicant was found to be ineligible.
- B. The Subgrantee Recipient is required to track data on both denials and deferrals for DOE **[OKgrants Quarterly Progress Report]**. The deferral form **[Form 33]** can be used to gather this data.

3. DEFERRAL REASONS

- A. The following is a list of reasons why a home may/must be deferred. Please note this is not an exhaustive list. Subgrantees should contact their ODOC liaison for any questions or concerns before deferring a home.
- a. The client has known health conditions that prohibit the installation of insulation and other weatherization materials because the health conditions might be exacerbated by starting or continuing weatherization work.
 - b. The building structure or its mechanical systems, including electrical and plumbing are in such a state of disrepair that failure is imminent, and the conditions cannot be resolved cost-effectively.
 - c. The building structure has deteriorated to such an extent that prevent diagnostics or weatherization measures to be completed.
 - d. The house has biological and unsanitary conditions such as sewage, odors, rotting wood, and/or feces that would further endanger the client and weatherization installers if weatherization work were performed.
 - e. Infestation of pests that cannot be reasonably resolved per Health and Safety requirements.
 - f. The house has been condemned or electrical, heating, plumbing, or other equipment has been “red tagged” by local or state building officials or utilities.
 - g. Moisture problems are so severe they cannot be resolved under existing health and safety measures and with minor repairs.
 - h. Dangerous conditions, such as high carbon monoxide levels in combustion appliances, improperly stored chemicals, or other fire hazards that cannot be resolved under existing health and safety measures.
 - i. The client is uncooperative, abusive, or threatening to the crew, subcontractors, auditors, inspectors, or others who must work on or visit the house.
 - j. Unsecured or aggressive pets that prevent workers from safely completing their work.
 - k. The extent and condition of lead-based paint, or suspected friable asbestos, in the house would potentially create further health and safety hazards.
 - l. Any condition exists which may endanger the health and/or safety of the work crew or subcontractor, the work should not proceed until the condition is corrected.
 - m. The correction of a health and safety issue is not an allowable or reasonable ODOC/DOE WAP expenditure, as outlined in ODOC’s Health and Safety requirements.
 - n. The client refuses to have certain measures installed or removed as per DOE guidance. For example, if a client refuses to have an unvented space heater removed or refuses to have mechanical ventilation installed.
 - o. Major remodeling is in progress that prevents the completion of required weatherization measures.
 - p. The presence of illegal or the use of any controlled substance in the home during the weatherization process.

FORMS

Form 24	Denial Letter
Form 33	Deferral Form
OKgrants	DOE Quarterly Report Form

RESOURCES

- Habitat for Humanity Home Preservation: <https://www.habitat.org/volunteer/near-you/home-preservation>
- HUD Home funds: https://portal.hud.gov/hudportal/documents/huddoc?id=20653_ch04.pdf
- USDA Home Repair program: <https://www.rd.usda.gov/programs-services/single-family-housing-repair-loans-grants>
- HUD Home Rehabilitation and Repair program: https://portal.hud.gov/hudportal/HUD?src=/program_offices/housing/sfh/title/sfixh

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 ten (10) local Subgrantee Agencies – serving sixty-seven (66.5) out of seventy-seven (77) counties. Twenty-three and one half (23.5) counties are currently unserved as of the date of this State Plan. Tulsa is partially served but has historically been served by two agencies. ODOC is working on a statewide competitive Request for Proposal to release to the network Summer 2022 that will allow for more sustainable and successful service areas. It will be released to the existing network and public for solicitation late Summer/Fall 2022 in time for new awards PY2023. See Section V.8.1 for more details regarding anticipated competitive solicitation to be developed in PY2022.

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.
5. Applications are income recertified every 12 months, and their waiting list application date is updated based on the income recertification date.

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.

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.

ODOC, in collaboration with Santa Fe Community College, developed two Field Guides (one for Mobile Homes and one for Single Family units) and received approval from DOE on June 4, 2018. They expired on June 4, 2021. ODOC worked with Santa Fe Community College once again to develop a comprehensive Field Guide (to include both Mobile Home and Single-Family units this time). The new Field Guide was approved on June 7, 2021, and is effective until June 7, 2026. Hard copies of the Field Guide were mailed to all Subgrantees and an electronic copy of the Field Guide is available on [ODOC's websites](#).

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 15-4:

1. "The Contractor must meet DOE standards in regards to quality of work in all weatherization installations, as outlined in Weatherization Program Notice 15-4, Section 2. These expectations are, at a minimum, to meet or exceed the standards set forth in the National Renewal 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](#)², 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 those in alignment with Appendix A (following ODOC's DOE approved energy audit procedures):

- installing insulation (floor, attic, wall, hot water tank);
- low flow showerheads;
- lighting retrofits;
- duct sealing;
- air sealing;
- weather-stripping, caulking, hole patching;
- replacing/repairing windows and doors;
- energy related health and safety measures;

² <https://grants.ok.gov/Login2.aspx?APPTHEME=OKOSF>

- heating and cooling system safety checks;
- replacement of heating and cooling systems;
- clean/repair and/or replacement of electric baseload appliances/fixtures;
- other incidental and necessary energy related repairs and replacements.

And those measures outside of Appendix A approved by DOE during the 2019 Energy Audit Re-approval:

- Tankless Hot Water Heaters
- Spray Foam

ENERGY AUDIT PROCEDURES (V.5.2)

DOE last conditionally approved OK's energy auditing procedures for site-built buildings and manufactured housing on May 28, 2019. The conditions were all satisfied and removed on December 2, 2020. ODOC's current energy audit procedures are approved through May 28, 2024. One of these conditions that was satisfied included the implementation of a new ODOC Policy and Procedures for Energy Audits that was required by ODOC policy on August 1, 2020. It is available on [ODOC's website](#).

ODOC has not weatherized any multifamily houses since 2010. We are currently approved to weatherize 2-4 unit dwellings using Single Family Audit Policies and Procedures.

FINAL INSPECTION (V.5.3)

The Subgrantee is responsible for completing an energy audit of each dwelling to determine the weatherization material needs of a unit. This responsibility shall not be subcontracted or assigned to other than subgrantee recipient personnel (unless approved by ODOC). All Subgrantees must comply with ODOC's Policies and Procedures for Energy Audits.

The Subgrantee is responsible to report only those dwelling units that meet the definition of completed, as required by 10 CFR 440.21, which must include meeting the following requirements:

1. The installation of NEAT/MHEA prescribed measures installed in order of the recommended measures, with a measure SIR at or above 1.0, and a unit SIR at or above 1.0 (cumulative) (with the exception of air sealing which can be less than 1.0).
2. All weatherization and H&S measures are installed in a workmanlike manner and the quality of work meet or exceed the DOE standards as set forth in NREL's Standard Work Specifications (SWS), as listed in ODOC's DOE approved Field Guide.
3. All weatherization measures are installed by trained Subgrantee crew member(s) or a trained contracted third party (Subcontractor).
4. Every dwelling unit has received a final inspection, including mechanical work performed, by a certified Quality Control Inspector (QCI). The requirements for each Quality Control Inspection are detailed in part D. This responsibility shall not be subcontracted or assigned to other than subgrantee recipient personnel, without prior ODOC approval

5. The final inspection may not occur until all necessary materials are applied.

Quality Control Inspection Process: DOE requires every reported WAP unit to receive a final inspection by a certified QCI per WPN 15-4. ODOC identified the following process to ensure subgrantee recipient compliance with the requirement:

1. Each client file must identify which retrofit installers, crew leaders, energy auditors, and quality control inspectors completed work on the home, and whether they are employed by the agency or a third party. This will ensure the state monitors and state QCI (Quality Assurance) monitor are aware of the separation of duties. If the subgrantee recipient utilizes the same person for the audit/assessment as the final inspection, the number of weatherization units inspected will increase to at least 10%.
2. The Quality Control Report [Form 44] must be used during the final inspection.
 - a. In order to prepare for the final inspection, the Subgrantee's quality control inspector should review the following in the client file and pre-fill the QCI Summary form prior to the final inspection
 - i. BWR/Client File checklist
 - ii. Energy Audit NEAT/MHEA to review the Recommended Measures, air infiltration work
 - iii. The Energy Audit Form [Form 28] should be utilized to determine pre and post weatherization diagnostics and compared to the QCI assessments.
 - iv. The QCI is expected to perform and record the following diagnostics during the final inspection (on the QCI Summary Form 38) and follow ODOC and/or DOE policy regarding each test required.

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.

ODOC's training requirements (see T&TA Plan) require that all QCIs 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.

LOCAL QUALITY INSPECTION REQUIREMENTS

If the QCI signs off on work that is later deemed incomplete by the State QCI, State Monitor (Program representative or Energy Projects Specialist), or DOE monitor, the Subgrantee will be

considered responsible for units reported to DOE and later deemed incomplete. This does not change if the QCI is an agency employee or contracted third party.

A dwelling may not be counted as complete until all weatherization measures are installed, the unit has received its final inspection by a certified Quality Control Inspector, and all work is completed in a skillful manner in accordance with the audit. Once the unit is reported as complete to ODOC, neither Federal nor ODOC Funding can be used for call-back/supplemental work. Therefore, Subgrantees should caution their final inspectors to thoroughly inspect each unit.

If the QCI, at the Subgrantee level, is repeatedly,

- a. not inspecting units according to NREL's SWS standards as listed in the DOE approved Field Guide;
- b. reporting incomplete units to ODOC and therefore to DOE;
- c. not using a certified QCI for final inspections, including not getting a valid signature on the Quality Control Report **[Form 44]**;
- d. signing off on units that are not compliant with ODOC's Policies and Procedures for Energy Audits;

the following disciplinary actions will be initiated:

- a. The Subgrantee will be placed on immediate probation for a period of up to 6 months or more and required to report all units to ODOC for verification of QCI final inspection.
- b. The Subgrantee will be paid on a reimbursement basis (in conjunction with satisfactorily meeting their management plan) during the probationary period, AND
- c. ODOC will widen the unit sampling of quality assurance reviews to 20-50% depending on the size of the Subgrantee during the probationary period to establish corrective action is achieved including verifying final inspections are conducted by a certified QCI, and that all work is installed in accordance with standards in SWS.
- d. The certified QCI will be required to attend necessary comprehensive or specific training depending on the needs of the Subgrantee.

If during the 6-month probationary period the QCI does not successfully meet the standards set forth above, ODOC may decide to extend the probationary period for an additional time period until ODOC is satisfied the Subgrantee can fulfill Quality Work Plan requirements.

If during the maximum probationary period up to 9 months ODOC is unsatisfied with the Subgrantee response to these requirements, ODOC will take further action to ensure DOE funding is utilized and expended based upon DOE rules, including but not limited to re-distribution of funding, and possible additional corrective actions as determined by the State.

STATE QUALITY ASSURANCE INSPECTION REQUIREMENTS

If Subgrantees utilize the same weatherization worker for the audit/assessment (energy auditor) as the final inspection (quality control inspector), ODOC will ensure that at least 10% of completed weatherized homes receive a Quality Assurance Inspection. Otherwise, if the workers are different, ODOC will only monitor 5% unless for other reasons they are a medium or high-risk agency.

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 Subgrantee's auditors and QCI inspectors) and use inspection results to identify the training and technical assistance needs of the network.

WEATHERIZATION ANALYSIS OF EFFECTIVENESS (V.6)

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

The WX Program Manager and Energy Projects Specialist compares Subgrantee's 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 their Contract Part II 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.

In addition to the production plan, monitoring and quality assurance inspections, training and technical assistance needs are also identified by the Energy Projects Specialist 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.

ODOC's Weatherization Program does not have specific objectives regarding diversity, equity, and inclusion, but will evaluate how we can add goals into our program in PY22.

HEALTH AND SAFETY (V.7)

The Oklahoma Department of Commerce (ODOC) developed a Health and Safety (H&S) Policy using the DOE recommended H&S Template as a guide for PY 2022. Content from ODOC's final H&S policy was copied and pasted directly into the DOE recommended H&S template and uploaded as an attachment to this application.

ODOC's complete H&S policy will be made available online by April 1, 2022.

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, two Director of Programs (one for planning and one for monitoring), a Program Manager, an Energy Efficiency Quality Assurance Specialist (technical monitoring) and an Energy Projects Specialist (programmatic, administrative, and fiscal monitoring). ODOC is also currently in the process of hiring another Energy Programs Planner. The team is also responsible as a pass through for the LIHEAP program.

All Subgrantee program guidance for the WAP can be found online on our Weatherization Contractor Implementation Page³:

In addition:

1. Each Subgrantee is currently a private, nonprofit, Community Action Agency (CAA). ODOC will not contract the Weatherization Assistance Program with entities other than a CAA or a public or nonprofit organization.
2. Each Subgrantee is selected on the basis of 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 19, 2022. Members of the public were invited to provide written or oral comments on the

³ Full link address: <https://www.okcommerce.gov/community-development/community-action-agencies/weatherization-assistance-program-wap/>

Weatherization Assistance Program and proposed changes for PY 22, 13 days prior to the hearing.

3. Subgrantees were invited to attend a virtual input session on December 7, 2021, prior to the PY22 draft. A recording of this session was sent to our network along with any comments received.
4. In the selection of proposed Subgrantee, 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 Subgrantee 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.

Due to the ongoing unserved service areas, and in consultation with NASCSP and other states, ODOC has determined the best pathway forward for weatherization in Oklahoma is to restructure the service areas to ensure a larger, more sustainable foundational allocation for each Subgrantee, along with the release of a competitive solicitation. ODOC anticipates the following developmental timeline:

DRAFT

January – March 2022	Presentation to CAA Executive Directors with new scenarios to solicit feedback in preparation for RFP and final service area map
	Propose changes to funding allocation formula and solicit network feedback
	Presentation on new Weatherization Program Operations Manual
April – June 2022	Finalize service area map and funding allocation formula including network feedback
	Submit draft RFP for ODOC, NASCSP, and DOE review
	Presentation to Executive Directors and Network on RFP to solicit feedback
July - September 2022	Hold an additional meeting (s) if needed, after giving network time to review and make changes to drafted RFP if needed.
	Submit RFP to OMES
	RFP closes
October – December 2022	Subgrantees provided preliminary notification of award (either future award for PY23 once ODOC has received Federal award or a current award if any funding for the Infrastructure Investment and Jobs Act is available at this time.)
January – March 2023	Train any new Subgrantees and prepare
	RFA for Subgrantees
April 1, 2023	PY23 New Program Year with New Service Areas

ADMINISTRATIVE EXPENDITURE LIMITS (V.8.2)

Per 10 CFR 440.18(e) 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 15-4. Second, ODOC also provides additional oversight and monitoring of the program both administratively and technically. The following is ODOC's approach to monitoring.

ADMINISTRATIVE, PROGRAMMATIC, AND FISCAL MONITORING

There is one (1) Energy Projects Specialist assigned to complete program, fiscal, and administrative monitoring, project management, and training and technical assistance to all Subgrantees and the Oklahoma Association of Community Action Agencies

Annually, in the fourth quarter of each program year, the Energy Projects Specialists conducts administrative, programmatic, and fiscal monitorings (either onsite, virtually via a state approved video conference platform, 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 program representative 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 Recipient 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.

TECHNICAL MONITORING

ODOC's Energy Efficiency Quality Assurance Specialist (EE QA Specialist) (who was BPI and QCI certified) resigned from their position June 2021. ODOC has a new EE QA Specialist that will be joining our team February 1, 2022. ODOC is releasing a solicitation January 2022 to hire a contractor to assist in the completion of all quality assurance inspections for PY21

The EE QA Specialist will report to the WAP Program Manager and will work closely with the Energy Projects Specialist in all aspects of the Quality Assurance Process. The EE QA Specialist will take over as lead in providing technical assistance to the WAP network and identifying T&T/A needs of each Subgrantee Recipient.

As part of each quality assurance inspection and any client file reviews, the EE QA Specialist will review compliance with ODOC's Policies and Procedures for Energy Audits. The EE QA Specialist will conduct 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 Program Representative or the EE QA Specialist 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 and the program representative 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 and/or Energy Project Specialist 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 Energy Projects Specialist 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 2022 Weatherization Subgrantees and the Oklahoma Association of Community Action Agencies. All 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 the goal is to complete at least one (1) quality assurance visit at the same time as the administrative, programmatic, and fiscal monitoring (if possible) per the schedule below:

- CAA of OKC- February 2022
- CADC – March 2022
- CARD –March 2022
- CDSA- February 2022
- Delta- January 2022

- DFCAF –March 2022
- INCA- March 2022
- Great Plains- March 2022
- KI BOIS – February 2022
- Little Dixie – March 2022
- Northeast- February 2022
- Opportunities- March 2022

Oklahoma Association of Community Action Agencies – March 2022

Any major findings from Subgrantee Recipient 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 RECIPIENT FROM PROGRAM

The Subgrantee Recipient has 30 days 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 Recipient 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 Recipient detailing the outstanding response that is needed to close the monitoring. If the Subgrantee Recipient 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 Recipient on 60 day probationary period and withhold any further disbursement of funds.
2. Send final notice to the Subgrantee Recipient'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 Recipient'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 Recipient 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 Recipient may submit a bid to provide services again.
3. Should the Subgrantee Recipient resolve the monitoring findings within the probationary period, ODOC will remove the probationary status, but the Subgrantee Recipient will remain a high-risk Subgrantee Recipient 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 Recipient fails to resolve the monitoring findings, ODOC will send notice of program termination to the Subgrantee Recipient's Board President and Executive Director.

In the event that a Subgrantee Recipient 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 Recipient 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 Recipient'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 in 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 Recipient 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 Recipient 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 Recipient letter, ODOC will convene an internal review committee to review the nature of the monitoring findings and the Subgrantee Recipient's letter to determine whether program termination is necessary due to continued poor performance.

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 T&TA Plan in the SF-424 Attachments for anticipated PY22 policy.

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 (10) BPI certified QCIs among the 10 Subgrantees . ODOC also employs a QCI – for a total of 11 QCIs available to the network. ODOC requires that Subgrantees upload their QCI certification(s) with each grant application. The 2022 training plan for Oklahoma weatherization is below. Additional trainings will be scheduled as required by ODOC.

In PY22 we will be procuring a new contract with a training center to provide training and technical needs to our network. ODOC will also continue our important partnership with OKACAA as well, but ODOC needs dedicated trainers and technical assistance to support our network and will be seeking to procure this.

PY22 TRAINING PLAN

Below is a list of trainings that are planned to be offer in PY22. Subgrantee attendance is mandatory for comprehensive, program manager, NEAT/MHEA, and other specific training as per our Training Requirements (see T&TA Plan). ODOC Staff is encouraged to attend at least 1 national conference.

SUBGRANTEE

- Retrofit Installer
- Crew Leader
- Quality Control Inspector
- Energy Auditor
- Beginner NEAT/MHEA
- Program Manager Training for New Program Mangers
- Continuing Education (online and classroom) NEAT/MHEA Training Based on Field Observations (during in-progress or quality assurance inspections)
- Multi Family Policies and Procedures
- 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

ODOC STAFF

- NASCSP Conferences
- Energy Out West
- Home Performance Coalition
- Any Qualified BPI Continuing Education for ODOC's Energy Efficiency Quality Assurance Specialist

WORKFORCE CREDENTIALS

Annually, ODOC requires all Subgrantees to upload a Training Plan, 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 PY2021 required form). These training plans are monitored by the Energy Projects Specialist and/or the Program Manager twice annually – once during Subgrantee Recipient 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 we will develop a process to do this in PY21. Update for PY22 – ODOC has put together a solicitation for a weatherization database in which all contractor licensing and vendor certifications can be maintained. This is scheduled to be procured by the end of PY21.

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 Recipient missing the approved Production Schedule and Management Plan.
2. If in 30 days, the Subgrantee Recipient 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 Recipient 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 Recipient'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 PY2019, 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 2021. During the PY2021 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.