

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0007944		2. Program/Project Title Weatherization Assistance Program	
3. Name and Address STATE OF OKLAHOMA 900 N. Stiles OKLAHOMA CITY, OK 731043234		4. Program/Project Start Date 04/01/2020	5. Completion Date 03/31/2021

SECTION A - BUDGET SUMMARY

Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1. DOE	81.042	\$ 0.00		\$ 3,525,126.00		\$ 3,525,126.00
2. STATE			\$ 0.00		\$ 0.00	\$ 0.00
3.						
4.						
5. TOTAL		\$ 0.00	\$ 0.00	\$ 3,525,126.00	\$ 0.00	\$ 3,525,126.00

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) GRANTEE ADMINISTRA TION	(2) SUBGRANTE E ADMINISTRA	(3) GRANTEE T&TA	(4) SUBGRANTE E T&TA	
a. Personnel	\$ 85,775.00	\$ 0.00	\$ 120,762.00	\$ 0.00	\$ 206,537.00
b. Fringe Benefits	\$ 34,310.00	\$ 0.00	\$ 48,305.00	\$ 0.00	\$ 82,615.00
c. Travel	\$ 0.00	\$ 0.00	\$ 14,000.00	\$ 0.00	\$ 14,000.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 0.00	\$ 0.00	\$ 4,252.00	\$ 0.00	\$ 4,252.00
f. Contract	\$ 5,964.00	\$ 250,352.00	\$ 346,000.00	\$ 24,000.00	\$ 3,093,508.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 3,320.00	\$ 0.00	\$ 3,320.00
i. Total Direct Charges	\$ 126,049.00	\$ 250,352.00	\$ 536,639.00	\$ 24,000.00	\$ 3,404,232.00
j. Indirect Costs	\$ 50,207.00	\$ 0.00	\$ 70,687.00	\$ 0.00	\$ 120,894.00
k. Totals	\$ 176,256.00	\$ 250,352.00	\$ 607,326.00	\$ 24,000.00	\$ 3,525,126.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

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SECTION A - BUDGET SUMMARY						
Grant Program Function or Activity (a)	Federal Catalog No. (b)	Estimated Unobligated Funds		New or Revised Budget		
		Federal (c)	Non-Federal (d)	Federal (e)	Non-Federal (f)	Total (g)
1.						
2.						
3.						
4.						
5. TOTAL		\$ 0.00	\$ 0.00	\$ 3,525,126.00	\$ 0.00	\$ 3,525,126.00

SECTION B - BUDGET CATEGORIES					
6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) PROGRAM OPERATIONS	(2) HEALTH AND SAFETY	(3) LIABILITY INSURANCE	(4) FINANCIAL AUDITS	
a. Personnel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 206,537.00
b. Fringe Benefits	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 82,615.00
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 14,000.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 4,252.00
f. Contract	\$ 2,136,133.00	\$ 299,059.00	\$ 17,500.00	\$ 14,500.00	\$ 3,093,508.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 3,320.00
i. Total Direct Charges	\$ 2,136,133.00	\$ 299,059.00	\$ 17,500.00	\$ 14,500.00	\$ 3,404,232.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 120,894.00
k. Totals	\$ 2,136,133.00	\$ 299,059.00	\$ 17,500.00	\$ 14,500.00	\$ 3,525,126.00
7. Program Income	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

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WEATHERIZATION ANNUAL FILE WORKSHEET

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IV.1 Subgrantees

Subgrantee (City)	Planned Funds/Units
CAA of OKC, Oklahoma/Canadian Counties (Oklahoma City)	\$615,639.00 70
Community Action Development Corporation (Frederick)	\$148,154.00 15
Community Action Resource & Development (Claremore)	\$279,684.00 38
Community Development Support Association (Enid)	\$54,152.00 6
Deep Fork Community Action Fdn. (Okmulgee)	\$182,660.00 18
Delta Community Action Fdn. (Lindsay)	\$84,030.00 10
Great Plains Improvement Fdn. (Lawton)	\$78,618.00 9
INCA Community Services, Inc. (Tishomingo)	\$64,269.00 9
KiBois Community Action Fdn. (Stigler)	\$175,091.00 17
Little Dixie Community Action Agency (Hugo)	\$104,967.00 10
Northeast Oklahoma Community Action Agency (Jay)	\$217,430.00 21
Opportunities, Inc. (Watonga)	\$195,135.00 20
TBD (Somewhere)	\$541,715.00 65
Total:	\$2,741,544.00 308

IV.2 WAP Production Schedule

Weatherization Plans	Units
Total Units (excluding reweatherized)	308
Rewatherized Units	0
Note: Planned units by quarter or category are no longer required, no information required for persons.	

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	308
C	Total Units Reweatherized	00
D	Total Dwelling Units to be Weatherized and Reweatherized (B + C)	308
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	\$2,136,133.00

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G	Total Dwelling Units to be Weatherized and Reweatherized (from line D)	308
H	Average Program Operations Costs per Unit (F divided by G)	\$6,935.50
I	Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$0.00
J	Total Average Cost per Dwelling (H plus I)	\$6,935.50

IV.3 Energy Savings

Method used to calculate savings: <input checked="" type="checkbox"/> WAP algorithm <input type="checkbox"/> Other (describe below)			
	Units	Savings Calculator (MBtus)	Energy Savings
This Year Estimate	308	29.3	9024
Prior Year Estimate	291	29.3	8526
Prior Year Actual	46	29.3	1348
Method used to calculate savings description:			

IV.4 DOE-Funded Leveraging Activities

N/A

IV.5 Policy Advisory Council Members

☐ Check if an existing state council or commission serves in this category and add name below

Antonne Cooper	Type of organization: Utility Contact Name: Phone: 4055533712 Email: dortondr@oge.com
Casey Letran	Type of organization: Unit of State Government Contact Name: Phone: 4055214390 Email: casey.lettran@okdhs.org
Catherine Woods	Type of organization: Unit of State Government Contact Name: Phone: 4055216381 Email: cwood@okhistory.org
Erich Font	Type of organization: Non-profit (not a financial institution) Contact Name: Phone: 4055952803 Email: erich.font@cohfh.org
Johnny Field	Type of organization: Other Contact Name: Phone: 4054129426 Email: workrite96@yahoo.com
Mary Jackson	Type of organization: Utility Contact Name: Phone: 9185992325 Email: majackson@aep.com
Michael Jones	Type of organization: Local agency Contact Name: Phone: (405)949-1495 Email: michaeljones@okacaa.org
Palma Lough	Type of organization: Utility Contact Name: Phone: 4053592514 Email: plough@ompa.com

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Sid Perry	Type of organization: Utility Contact Name: Phone: 4056277754 Email: sksperry@oaec.coop
Teri Green	Type of organization: Utility Contact Name: Phone: 4055521802 Email: Teri.Green@oklahomanaturalgas.com

IV.6 State Plan Hearings (Note: attach notes and transcripts to the SF-424)

Date Held	Newspapers that publicized the hearings and the dates the notice ran
01/23/2020	Public hearing notification was sent via GovDelivery on January 10, 2020, 13 days prior to the hearing held on January 23, 2020. ODOC also published notice on our website on January 8, 2020. A copy of the proposed PY20 state plan was available on ODOC's website during the entire public comment period of January 13 – January 27, 2020. A webinar was held with the network on January 23, 2020 reviewing the Annual File, Budget, and Master File. Please see the SF-424 attachment "Public Hearing Notices" for complete notification documentation. Please see the SF-424 attachment "Public Hearing Transcript" for the required court report transcript. Please see the SF-424 attachment "Public Hearing Slides"

IV.7 Miscellaneous

Southwest notified the Oklahoma Department of Commerce [ODOC] of their intent to terminate their status as a Weatherization Assistance Program service provider on January 11, 2019. A service provider for Greer, Harmon and Jackson counties was selected through a competitive in network procurement process on October 2019. Community Action Development Corporation was awarded all three counties.

Big Five notified ODOC on August 19, 2019 of their voluntary termination of their agency's weatherization program. The 3 counties that Big Five formerly served are currently unserved and reflected in the "TBD" Subgrantee listed above. ODOC anticipates releasing a Request for Proposal to procure weatherization services for these counties early March 2020.

United notified ODOC on August 6, 2019 of their voluntary termination of their agency's weatherization program. The 9 counties that United formerly served are currently unserved and reflected in the "TBD" Subgrantee listed above. ODOC anticipates releasing a Request for Proposal to procure weatherization services for these counties early March 2020. Tulsa has historically been split between both CARD and United, and we will continue to split Tulsa's funds until we restructure and rebid the entire state by 2022.

PY 2020 ASCI Action Plan is attached to SF-424.

ODOC held a PAC meeting on January 14, 2020. We reviewed the PY20 drafted state plan in depth. PAC Activity Documentation is attached to SF-424.

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, Program Planner

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

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This worksheet should be completed as specified in Section III of the Weatherization Assistance Program Application Package.

V.1 Eligibility

V.1.1 Approach to Determining Client Eligibility

Provide a description of the definition of income used to determine eligibility

See [CAA Implementation Manual Requirement 301, Section II A](#)

Oklahoma defines eligibility for WAP services at the 200% of poverty level, as defined in the annual WPN -Poverty Income Guidelines. Oklahoma Subgrantee Recipients are required to accumulate 12 months past income documentation to determine client eligibility. If an applicant is on a waiting list for over 12 months, income verification will have to be updated annually. 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 19-3- 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 19-3 Section C. Gross Income is to be used, not Net Income.", and will follow WPN 20 – 3 when available.

Describe what household eligibility basis will be used in the Program

[See CAA Implementation Manual Requirement 301, Section II A](#)

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.

Describe the process for ensuring qualified aliens are eligible for weatherization benefits

Per [CAA Implementation Manual, Requirement #103, Affirmative Action Requirements, Section I](#)

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.

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

Per CAA Implementation Manual [Requirement #301, Section II.D](#) - Procedures for Application processing

Procedures for Application Processing:

1. Subgrantee agencies shall use the Weatherization Assistance Program Application **[Form 22]** to determine eligibility of the applicant. (which includes income verification).
2. If the applicant has no evidence of income, or no-income, the contractor 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

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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 and selected for service and prioritized based upon need.

Also maintained in the client file is owner and rental documentation. (see Requirement 304 - Client File)

http://okcommerce.gov/assets/files/grants/CAA_Contractor_Implementation_Manual.pdf

Describe Reweathering compliance

Per [CAA Implementation Manual Policy Requirement # 301, Section II. A. 4.](#)

All Contracts: Contractor shall not weatherize a unit which:

1. 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 completed; or
2. Was previously weatherized with ODOC funds, except:
 - a. If such dwelling units have been damaged by fire, flood or Act of God and repair of the damage to weatherization material is not paid for by insurance; or
 - b. If the unit was weatherized during the period September 30, 1975, through September 30, 1994, it may be eligible for **re-weatherization**. These homes will be reported separately .

Subgrantee agencies may count these homes as completions for the purposes of compliance with the per-home expenditure limits. Each dwelling unit must receive a new energy audit that takes into account any previous energy conservation improvements to the dwelling.

Describe what structures are eligible for weatherization

Eligible buildings include owner and renter-occupied single-family homes and manufactured homes (mobile homes). Duplexes, triplexes and fourplexes are also eligible, with prior ODOC review and approval on the energy audit. These 2 - 4 unit buildings must be audited with a single family audit (NEAT), per Oklahoma's DOE conditional energy audit approval. Oklahoma does not have adequate funds at the present time to weatherize multifamily buildings of 5 units or more.

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

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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 dated 3/29/2010. 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 [CAA Implementation Manual Requirement # 301](#)

Describe how Rental Units/Multifamily Buildings will be addressed

- A Subgrantee may weatherize a multifamily (MF) building, defined as duplexes, three and four unit buildings, and buildings with more than 5 units, if the following eligibility is met and written approval from ODOC has been obtained. Audit approval by DOE for buildings with 5 or more units will be required; single family audits are approved for multifamily buildings with 2-4 units.
- Buildings are eligible if
 1. 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 recipient may weatherize a building containing rental dwelling units where:

1. The Subgrantee recipient has obtained the written permission of the owner or owner's agent;
2. The Subgrantee recipient 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 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; [See Requirement 103 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.

Multi-family Buildings with 100 or more units:

For PY 2020, OK WAP will not weatherize rental units in a large MF building. The largest Subgrantee in OK will weatherize approximately 50 units for the entire program year, so it is not feasible to plan for this type of weatherization. Oklahoma does not currently have an approved energy audit for MF buildings.

See [CAA Implementation Manual, Requirement #301](#)

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Describe the deferral Process

See CAA Implementation Manual Requirement 310 for Deferral Process:

[CAA Implementation Manual, Requirement #10](#)

I. CONTRACTUAL REQUIREMENTS

A. Subgrantee Recipients must ensure that clients meet eligibility requirements and that units are a reasonable candidate for weatherization.

B. Subgrantee Recipients shall establish procedures to comply with the requirements of [10 CFR 440.22\[1\]](#), Eligible Dwelling Units, to assist eligible households, maximize energy conservation, and minimize health and safety risk associated with Weatherization work.

II. TERMS AND DEFINITIONS:

Deferral A client that meets eligibility requirements (for example, income), but the unit occupied by the client is not a reasonable candidate for weatherization. This is a distinction from ineligible applicants who must be denied.

Denial A client or unit that does not meet eligibility requirements.

Eligible A client and unit are eligible for weatherization services if they meet the criteria outlined in Requirement 301. Both the client and unit must be eligible to receive weatherization services.

Ineligible A client who does not meet eligibility requirements (for example, over the income requirements) or a unit that does not meet current eligibility requirements (for example, the home has already been weatherized)

III. PROCEDURES

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. Subgrantee Recipients, 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. Subgrantee Recipients should review Requirement 307 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. Subgrantee Recipients should contact their ODOC liaison for assistance, before deferral, as appropriate.

1. CATEGORIES OF DEFERAL/DENIAL

A. In general, there are three situations that require a denial or deferral. All three situations require that the applicant or client be notified in writing using the Weatherization Denial/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 or a unit may have already been weatherized.

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 Subgrantee Recipient that the situation identified has been remedied.

c. If during the course of weatherization work, a previously unidentified health and safety issue is now identified, Requirement 307 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.

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2. DATA TRACKING

A. The Subgrantee recipient is required to track the following data on both denials and deferrals for both DHS **[Form 47]** and DOE **[OKgrants Quarterly Progress Report]**.

- 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.

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. Subgrantee Recipients 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 sewage, feces or other sanitary problems that would further endanger the client and weatherization installers if weatherization work were performed.
- e. Infestation of pests that cannot be resolved following Requirement 307.
- 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.
- a. 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 in the house would potentially create further health and safety hazards.
- l. In the finding of the energy auditor, 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 DOE WAP expenditure, as outlined in Requirement 307.
- 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. The presence of illegal or the use of any controlled substance in the home during the weatherization process.

III. FORMS

Form 33 Deferral or Denial Form
Form 47 DHS Excel Quarterly Report
OKgrants DOE Quarterly Report Form

IV. 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/sfxhs

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[1] http://www.ecfr.gov/cgi-bin/text-idx?tpl=/ecfrbrowse/Title10/10cfr440_main_02.tpl

V.1.3 Definition of Children

Definition of children (below age): 13

V.1.4 Approach to Tribal Organizations

☐ Recommend tribal organization(s) be treated as local applicant?

If YES, Recommendation. If NO, Statement that assistance to low-income tribe members and other low-income persons is equal.

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 Recipients. This is because the Native American population is not evenly distributed across the state.

V.2 Selection of Areas to Be Served

Per 10 CFR 440.14(c)(6)(ii): The Weatherization Assistance Program in Oklahoma is available through twelve local Subgrantee Agencies – serving sixty-four (64) out of seventy-seven (77) counties. Thirteen (13) counties are currently unserved as of the date of this State Plan. Two local Subgrantee Agencies (Big Five and United) decided to no longer offer the Weatherization Assistance Program in PY2019, leaving thirteen (13) counties without a service provider. ODOC is currently developing a Request for Proposal for an anticipated release date of early March 2020.

In PY2020, ODOC will use the same formula used in previous DOE plan years, which takes into account the poverty population, elderly population and the number of substandard housing within each county.

ODOC has formed a Program Evaluation Task Force, composed of ODOC staff, five local Subgrantee agencies, and the Oklahoma Association of Community Action Agencies. The goal of the Program Evaluation Task Force is to re-evaluate the current structure of the Oklahoma Weatherization Program to improve its program delivery quality and efficiency. ODOC has asked the Task Force to provide feedback on service territories, formula allocation, and technical work force staffing and workforce development issues. ODOC would also like to work with the Task Force on the development of a weatherization program specific self-assessment or program evaluation tool. ODOC plans to re-bid the entire state, using new service areas and formula allocation by PY2022.

V.3 Priorities

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

- * 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. Contractors 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.

V.4 Climatic Conditions

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.

V.5 Type of Weatherization Work to Be Done

V.5.1 Technical Guides and Materials

All weatherization work in Oklahoma is performed in accordance with 10 CFR 440 Appendix A, and a DOE approved energy audit. All Subgrantees are required to follow Oklahoma's DOE approved energy audit procedures for single family units, manufactured homes, and multi-family units, which includes the usage of the National Energy Audit Tool, and Manufactured Home Energy Audit (Version 8.9). DOE gave conditional re-approval of Oklahoma's Energy Audit Procedures on May 28, 2019. ODOC is currently working on implementing the five conditions required by DOE by March 31, 2020.

In PY 2018, Oklahoma developed two Field Guides (one for Mobile Homes and one for Single Family Units) in collaboration with Santa Fe Community College that aligned with the NREL SWS updates at the time. Both Field Guides were approved by DOE on June 4, 2018 and remain valid until June 4, 2021. Subgrantee Recipients 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 15 Subgrantee Recipients. PY18 funds were awarded to each agency for the purposes of purchasing a tablet to access electronic copies of the Field Guide while in the field. Electronic copies of both field guides are available at this [link\[1\]](#).

Oklahoma annually updates policies and procedures when changes are made to DOE programmatic guidance. Subgrantee agreements

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and vendor contracts align with current DOE guidance and SWS.

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, Subgrantee Recipients 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 Subgrantee Recipients 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, installing insulation; reducing air infiltration through the application of caulk, 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).

[1] Full link to field guides - <https://www.okcommerce.gov/community-development/community-action-agencies/weatherization-assistance-program-wap/>

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

Field guide types approval dates

Single-Family: 6/4/2018

Manufactured Housing: 6/4/2018

Multi-Family:

V.5.2 Energy Audit Procedures

Audit Procedures and Dates Most Recently Approved by DOE

Audit Procedure: Single-Family

Audit Name: NEAT

Approval Date: 5/28/2019

Audit Procedure: Manufactured Housing

Audit Name: MHEA

Approval Date: 5/28/2019

Audit Procedure: Multi-Family

Audit Name: No Audit/Priority List for this building type

Approval Date:

Comments

DOE last conditionally approved OK's energy auditing procedures for site built buildings and manufactured housing on May 28, 2019. ODOC continues to work on implementing the required conditions and work to improve our energy audit quality so that conditions may be removed.

ODOC has not weatherized any multi family houses since 2010. We do not anticipate weatherizing any multi family units in PY20 nor in the near future. We are approved to weatherize 2-4 unit dwellings using the single family audit.

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V.5.3 Final Inspection

ODOC policy (Requirement 305) 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, or contracted third party, performs a final inspection(s) (certified QCI) and certifies that the work has been completed in a workmanlike manner and in accordance with the priority determined by the audit procedures 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 has informed the network of the importance in knowing the CORE competencies for the weatherization positions at or above each individual's JTA. ODOC, through the Training Center contract with the Oklahoma Association of CAA's (OKACAA), provides ample Comprehensive and Specific training opportunities to assist Subgrantees in acquiring the CORE competencies. 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.

As outlined in CAA Manual Requirement 305, ODOC developed a quality control inspection process in accordance with WPN 15-4 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 Subgrantee Recipients 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 sub recipients' auditors and QCI inspectors) and use inspection results to identify the training and technical assistance needs of the network, in partnership with OKACAA.

V.6 Weatherization Analysis of Effectiveness

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.

Program Representatives and the WX Program Manager compare Subgrantee Recipient monthly progress reports submitted in OKGrants with each Subgrantee Recipient's ODOC approved management plan for the entire program year. Subgrantee Recipients 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 Recipient 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 Recipient is repeatedly falling behind on production, ODOC will place the Subgrantee Recipient on a probationary period as per the CAA Implementation Manual, and use the information gathered during the probationary period to inform training and technical assistance needs the Subgrantee Recipient 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. For example, the most common QA findings in PY18 were those related to Energy Audit Procedures and quality of Energy Audit. These findings, along with the Energy Audit feedback provided by DOE to ODOC, have resulted in:

- ODOC reevaluating program policy (ongoing),
- all energy auditors and quality control being required to attend a comprehensive NEAT/MHEA training in PY2019.

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- competitively procuring the services of a IREC accredited training center (for up to three years) that specializes in NEAT/MHEA energy audits.
- Hiring a technical monitor on staff at ODOC

In PY18, ODOC identified a continuous improvement opportunity to create a QA monitoring process within OKGrants, based on feedback from ODOC staff, the EE QA Specialist, and Subgrantee Recipients about the record keeping challenges in the QA monitoring process. This new process was successful and will again be implemented, with continued improvements in PY20. The OKGrants process does allow for more transparency in monitoring, better record keeping, scheduling, and follow up on QA Inspections.

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

Annually, a risk assessment is conducted of Subgrantee Recipients to determine how effectively a Subgrantee Recipient is/has been managing their Weatherization program, and whether monitoring and training/technical assistance might be needed. In PY20, the WX Program Manager plans to use the ODOC's risk assessment as the foundation for the creation of a Subgrantee Recipient's self-assessment, which Subgrantee Recipients could use themselves to evaluate their own capacity and effectiveness.

V.7 Health and Safety

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 2020. Content from ODOC's drafted H&S policy was copied and pasted directly into the DOE recommended H&S template and uploaded as an attachment to this application. We are still considering additional updates to our H&S policy, so we are submitting our drafted red line version, and will submit the final version to DOE for approval when complete.

ODOC's complete and most current approved H&S policy (Requirement 307) is available online in [ODOC's Community Action Agency Implementation Manual](#).

ODOC filled out the data table within the Template for the first time. Please note the special comment below and within the Template:

NOTE – the data in the table below is from Program Year 2018 (April 1, 2018 – March 31, 2019). It is Oklahoma's first attempt to collect this type of detailed data in a meaningful, aggregate way. After analyzing all agency reports, it is clear Oklahoma needs to improve our data collection. For example, Oklahoma spent \$181,393.00 in H&S in PY18. This number is from the official book of record in both the agencies' and ODOC's accounting records.

ODOC created a supplemental quarterly H&S measure report to collect the itemized expenditures by H&S measure that were aggregated in this table. These expenditures totaled only \$132,581.21, a difference of \$48,811.79. This discrepancy is in the data collection and reporting, not in the actual allowability or actual total of expenditures. For example, agency Program Managers were often the ones filling out the supplemental quarterly H&S measure report, rather than agency financial staff. ODOC will work to improve our data collection for PY20 and PY21, so that the itemized data reconciles with the official record of H&S expenditures.

Although this table reflects a need for only 11% in H&S, we anticipate being much closer to 14% in PY2019. ODOC's most recent quarterly financial report for PY19 reflects 12% spent to date on H&S, and we know several agencies have contacted us with requests to exceed their threshold of 14%. ODOC would like to request the 14% in H&S budget as reflect in the PAGE budget.

V.8 Program Management

V.8.1 Overview and Organization

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, and Program Representatives/Monitors. The team is also responsible as a pass through for the LIHEAP program.

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All Subgrantee Recipient program guidance for the WAP can be found online on our Weatherization Contractor Implementation [Page\[1\]](#):

In addition:

1. Each Subgrantee Recipient 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 Recipient 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 23, 2020. Members of the public were invited to provide written or oral comments on the Weatherization Assistance Program and proposed changes for PY 20, 10 days prior to the hearing.
3. In the selection of proposed Subgrantee Recipients, 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 Recipients to secure volunteers. Within the State of Oklahoma, all proposed Subgrantee Recipients are entities, which have, and are operating programs under these rules or the Economic Opportunity Act of 1964.

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

V.8.2 Administrative Expenditure Limits

Per 10 CFR 440.18(d) not more than 10% of any grant made to a state may be used by the Grantee and Subgrantees for administrative purposes, not more than 5% may be used by the state, and not less than 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.

V.8.3 Monitoring Activities

MONITORING

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

ADMINISTRATIVE MONITORING

Four (4) Program Representatives are assigned Subgrantee Recipients and the Oklahoma Association of Community Action agencies for the purposes of administrative monitoring and the provision of technical assistance. The comprehensive monitorings encompass a Programmatic and Management Review, a Client File Review, and a Financial Review. Within the comprehensive monitoring, Oklahoma Program Representatives review financial records, client files, inventory, energy audits, health and safety. The awareness of a primary contact in our office has made for a good working relationship between the Subgrantee Recipient and the Program Representative. Many questions and concerns relating to field operations are funneled through the Program Representative because of the established rapport.

Program Representatives will conduct administrative/fiscal annual monitorings (either onsite or via desktop monitoring) of all Subgrantee Recipients. The risk assessment of each Subgrantee Recipient, performed prior to awarding Subgrantee Recipients each program year, stipulates additional visits or monitoring requirements, if the Subgrantee Recipient is identified to be a "medium" or "high" risk. Program Representatives stay in regular contact with the local agencies to provide technical assistance, as needed.

Within 30 days after each visit, the program representative prepares a written report on its findings and sends it to the Subgrantee Recipient for corrective action. The Subgrantee Recipient has 30 days to respond to all monitoring findings through corrective action. ODOC may ask the Subgrantee Recipient 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.

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TECHNICAL MONITORING

ODOC hired a BPI QCI and EA certified Energy Efficiency Quality Assurance Specialist (EE QA Specialist) December 2019. Beginning in PY2020, ODOC will no longer contract with third parties for quality assurance monitoring. ODOC's EE QA Specialist 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 Recipient 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 will report to the WAP Program Manager and will work closely with the Program Representatives 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

In PY 2018 and PY2019, ODOC divided Oklahoma into two different "monitoring" regions, those regions will no longer be in effect in PY2020 now that all technical monitoring will be completed in house.

MONITORING ACTIVITIES

Program Representatives and the EE QA Specialist review NEAT/MHEA settings and reports (energy audit), building weatherization reports (materials, H&S), client eligibility documentation, client files (work conducted, rentals, feedback).

- Program Representatives also review Subgrantee Recipient records (reporting, financial/administrative including financial audits, inventory). ODOC requires every Subgrantee Recipient to submit a financial audit within six months of the close of their fiscal year to ODOC's audit manager; in addition it is reviewed by ODOC Program Representatives. Our monitoring also consists of review of procurement records to ensure that materials ordered are in conformance with Appendix A standards.
- EE QA Specialist 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), by the Program Representative or the EE QA Specialist 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 Subgrantee Recipients in subsequent visits. The Subgrantee Recipient 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 rescheduled or another alternative (such as photo documentation with detailed justification the work was completed). Additionally, the EE QA Specialist and/or Program Representative may suggest training activities, or provide technical assistance to help Subgrantee Recipients' with consistent deficiencies. ODOC encourages all Subgrantee Recipients 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 four (4) Program Representatives will charge time to both the ODOC T&T/A and Administrative budget for personnel and benefits, in addition to approximately 25% Grantee T&T/A for monitoring costs. Approximately 60% of the EE QA Specialist salary will be paid out of the T&T/A budget (no administrative dollars will be charged). His remaining salary will be paid with DHS LIHEAP funds.

MONITORING SCHEDULE DETAIL AND PLAN

Below is the tentative monitoring schedule for PY 2020 Weatherization Subgrantee Recipients, and the Oklahoma Association of Community Action Agencies. All of these scheduled monitorings include administrative, programmatic, and fiscal monitoring. ODOC made a significant change to the programmatic/fiscal/administrative monitoring process since the last State Plan. Starting with PY2019, ODOC will conduct all programmatic/fiscal/administrative onsite monitorings in the 4th quarter of the current program year. So, all Subgrantee PY2020 contracts will be monitored between January – March 2021.

- CAA of OKC- February 2021
- CADC – March 2021
- CARD –March 2021
- CDSA- February 2021
- Delta- January 2021
- DFCAF –March 2021
- INCA- March 2021

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- Great Plains- March 2021
- KI BOIS – February 2021
- Little Dixie – March 2021
- Northeast- February 2021
- Opportunities- March 2021
- Oklahoma Association of Community Action Agencies – March 2021

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 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.

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Subgrantee Recipients certification or training requirements:

Oklahoma will utilize 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 Requirement 311 (file named "T&TA Plan") in SF-424 Attachments for redline, drafted PY2020 policy, that lists our new hire and continuing education and training requirements for all staff. This policy also includes certification requirements. Please note that the policy is still not final and will be opened to feedback from our network (no proposed changes are being made to the new hire and continuing education/training requirements). Our current T&TA requirements can always be found in our Community Action Agency Implementation Manual here: https://okcommerce.gov/assets/files/grants/CAA_Contractor_Implementation_Manual.pdf.

The Oklahoma Department of Commerce/Office of Community Development (ODOC/OCD) utilizes surveys, roundtable discussions, Grantee monitoring results, and meetings with the Oklahoma Weatherization and Housing Advisory Council (OWHAC) to assess the training needs for Weatherization staff and crews. Additionally, ODOC contracts a large portion of the Subgrantees training and technical assistance, including New Hire Training (classes, workshops, weatherization training center) through the Oklahoma Association of Community Action Agencies (OKACAA). OKACAA tracks all training for Oklahoma WAP to maintain the credentials of Subgrantees to ensure maintenance of certifications and to determine further training needs.

During PY 2020, ODOC will continue to collaborate with OKACAA to prepare and train the WAP network on the required Quality Control Inspector (QCI) Certification, Retrofit Installer, Crew Leader, and Energy Auditor, along with other required H&S trainings.

There are (12) BPI certified QCIs among the 12 Subgrantee Recipients. OKACAA has one BPI certified QCI on staff, and one contracted QCI. ODOC now also employs a QCI – for a total of 15 QCIs available to the network. ODOC requires that agencies upload their QCI certification(s) with each grant application. OKACAA is an IREC accredited training center and will provide Comprehensive and Specific trainings for all weatherization staff in the 2020 Plan Year.

Oklahoma will utilize Quality Assurance Review data and the DOE Project Officer guidance in PY 2020 to ensure the training needs are met in Oklahoma. The 2020 training plan for Oklahoma weatherization is below. Additional trainings will be scheduled as required by ODOC.

TRAINING PLAN

Quarter 1 Apr- June

- Renovation, Repair, and Painting (RRP) - offered 3 times
- Quality Control Inspector/Energy Auditor
- Crew Leader/Retrofit Installer
- CAZ Visual Inspection, Diagnostics, Cook Stoves (Refresher)
- Pressure Diagnostic Testing (Refresher)
- Quarterly EA Webinar w/CHP Energy Solutions

Quarter 2 July-Sept

- Renovation, Repair, and Painting (RRP) - offered 3 times
- Quality Control Inspector/Energy Auditor
- Crew Leader/Retrofit Installer
- Building Envelope, Roofs and Attics, Attic Ventilation, Foundations and Basements, Walls, Windows, Doors (Refresher)
- ASHRAE, Indoor Air Quality (Refresher)
- State Association Fall Conference (WX Track - Policy Updates)
- Quarterly EA Webinar w/CHP Energy Solutions

Quarter 3 Oct - Dec

- Renovation, Repair, and Painting (RRP) - offered 3 times
- Quality Control Inspector/Energy Auditor

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- Crew Leader/Retrofit Installer
- CAZ Visual Inspection, Diagnostics, Cook Stoves (Refresher)
- Quarterly EA Webinar w/CHP Energy Solutions

Quarter 4 Jan – Mar

- Renovation, Repair, and Painting (RRP) - offered 3 times
- Quality Control Inspector/Energy Auditor
- Crew Leader/Retrofit Installer
- Quarterly EA Webinar w/CHP Energy Solutions

Trainings in Development (either by ODOC or by ODOC in partnership with OKACAA)

- Program Manager Training for New Program Mangers
- Program Manager Training for Program Mangers
- ODOC Policies and Procedures
- Energy Audit Field Mentoring Program
- 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

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.

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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 Subgrantee Recipients. To receive redistributed funds, Subgrantee Recipients must submit written justification to ODOC describing ability to complete additional units and expend funds, upon notification of availability.

Effectiveness and Energy Savings:

ODOC will compile the energy savings of each Subgrantee Recipients at the end of the program year to determine if energy savings, and the effectiveness of weatherization installations, was consistent throughout the network. By comparing Subgrantee Recipient total energy savings, ODOC will be able to determine if agencies are meeting their potential energy savings, per the estimated goal of the State, and determine which Subgrantee Recipients fell short. This data will help ODOC Program Representatives in their upcoming monitoring by pinpointing the agencies that seem to underperform in their potential energy savings annually, and identify possible oversights on the weatherization installations.

See Attachment B for CAA Manual Requirement 311 (Training Requirements).

Funds effectiveness:

Appropriate T&T/A activities are completed with an evaluation of the presented materials. These evaluations are used to respond to further training, as well as, follow up and one on one assistance. ODOC also uses patterns and common findings during the EE QA Specialist monitoring visits (Quality Assurance Reviews) to determine needed T&T A.

Training Resources:

New hires in the weatherization program will attend all training modules coordinated by ODOC or OKACAA to ensure their skills and knowledge are at an acceptable level. Existing staff will also have all training resources available to them in order to maintain their program knowledge. Training will be provided by peer-to-peer training at weatherization conferences, national training, and by public and private industry and educational entities coordinated by ODOC with the assistance of OKACAA.

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 Subgrantee Recipients. This will be required for use in PY2020. 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, and receive the full effects of the weatherization installations.

Percent of overall trainings

Comprehensive Trainings:	75.0
Specific Trainings:	25.0

Breakdown of T&TA training budget

Percent of budget allocated to Auditor/QCI trainings:	60.0
Percent of budget allocated to Crew/Installer trainings:	30.0
Percent of budget allocated to Management/Financial trainings:	10.0

V.9 Energy Crisis and Disaster Plan

Oklahoma will not develop an Energy Crisis Plan for PY 2020.

Per WPN 12-7 Revised Guidance on Disaster Relief planning, Oklahoma Subgrantee Recipients are allowed to utilize weatherization funds to assist

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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 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.