

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 04/01/2021	5. Completion Date 03/31/2022

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 2021 WAP Formula Funds	81.042	\$ 1,562,903.00		\$ 3,271,910.00		\$ 4,834,813.00
2.						
3.						
4.						
5. TOTAL		\$ 1,562,903.00	\$ 0.00	\$ 3,271,910.00	\$ 0.00	\$ 4,834,813.00

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	\$ 127,118.00	\$ 0.00	\$ 132,052.00	\$ 0.00	\$ 259,170.00
b. Fringe Benefits	\$ 63,558.00	\$ 0.00	\$ 66,026.00	\$ 0.00	\$ 129,584.00
c. Travel	\$ 0.00	\$ 0.00	\$ 10,050.00	\$ 0.00	\$ 10,050.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 0.00	\$ 0.00	\$ 2,000.00	\$ 0.00	\$ 2,000.00
f. Contract	\$ 9,928.00	\$ 364,059.00	\$ 338,651.00	\$ 22,000.00	\$ 4,342,692.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
i. Total Direct Charges	\$ 200,604.00	\$ 364,059.00	\$ 548,779.00	\$ 22,000.00	\$ 4,743,496.00
j. Indirect Costs	\$ 44,789.00	\$ 0.00	\$ 46,528.00	\$ 0.00	\$ 91,317.00
k. Totals	\$ 245,393.00	\$ 364,059.00	\$ 595,307.00	\$ 22,000.00	\$ 4,834,813.00
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		\$ 1,562,903.00	\$ 0.00	\$ 3,271,910.00	\$ 0.00	\$ 4,834,813.00

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	\$ 259,170.00
b. Fringe Benefits	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 129,584.00
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 10,050.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 2,000.00
f. Contract	\$ 3,022,656.00	\$ 453,398.00	\$ 17,500.00	\$ 14,500.00	\$ 4,342,692.00
g. Construction	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
h. Other Direct Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00
i. Total Direct Charges	\$ 3,022,656.00	\$ 453,398.00	\$ 17,500.00	\$ 14,500.00	\$ 4,743,496.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 91,317.00
k. Totals	\$ 3,022,656.00	\$ 453,398.00	\$ 17,500.00	\$ 14,500.00	\$ 4,834,813.00
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		\$ 1,562,903.00	\$ 0.00	\$ 3,271,910.00	\$ 0.00	\$ 4,834,813.00

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) VEHICLES AND EQUIPMENT	(2)	(3)	(4)	
a. Personnel	\$ 0.00				\$ 259,170.00
b. Fringe Benefits	\$ 0.00				\$ 129,584.00
c. Travel	\$ 0.00				\$ 10,050.00
d. Equipment	\$ 0.00				\$ 0.00
e. Supplies	\$ 0.00				\$ 2,000.00
f. Contract	\$ 100,000.00				\$ 4,342,692.00
g. Construction	\$ 0.00				\$ 0.00
h. Other Direct Costs	\$ 0.00				\$ 0.00
i. Total Direct Charges	\$ 100,000.00				\$ 4,743,496.00
j. Indirect Costs	\$ 0.00				\$ 91,317.00
k. Totals	\$ 100,000.00				\$ 4,834,813.00
7. Program Income	\$ 0.00				\$ 0.00

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
WEATHERIZATION ANNUAL FILE WORKSHEET

(Grant Number: EE0007944, State: OK, Program Year: 2021)

IV.1 Subgrantees

Subgrantee (City)	Planned Funds/Units
CAA of OKC, Oklahoma/Canadian Counties (Oklahoma City)	\$695,638.00 80
Community Action Development Corporation (Frederick)	\$211,360.00 21
Community Action Resource & Development (Claremore)	\$354,327.00 40
Community Development Support Association (Enid)	\$170,021.00 18
Delta Community Action Fdn. (Lindsay)	\$80,068.00 10
Great Plains Improvement Fdn. (Lawton)	\$75,040.00 7
INCA Community Services, Inc. (Tishomingo)	\$61,708.00 8
KiBois Community Action Fdn. (Stigler)	\$164,668.00 17
Little Dixie Community Action Agency (Hugo)	\$220,972.00 28
Northeast Oklahoma Community Action Agency (Jay)	\$204,003.00 18
Opportunities, Inc. (Watonga)	\$288,587.00 25
TBD (Somewhere)	\$1,467,721.00 150
Total:	\$3,994,113.00 422

IV.2 WAP Production Schedule

Planned units by quarter or category are no longer required, no information required for persons.

Weatherization Plans	Units
Total Units (excluding reweatherized)	422
	422
Rewatherized Units	0
	0

Average Unit Costs, Units subject to DOE Project Rules

VEHICLE & EQUIPMENT AVERAGE COST PER DWELLING UNIT (DOE RULES)

A Total Vehicles & Equipment (\$5,000 or more) Budget	\$100,000.00
B Total Units Weatherized	422
C Total Units Reweatherized	0
D Total Dwelling Units to be Weatherized and Reweatherized (B + C)	422
E Average Vehicles & Equipment Acquisition Cost per Unit (A divided by D)	\$236.97

AVERAGE COST PER DWELLING UNIT (DOE RULES)

F Total Funds for Program Operations	\$3,022,656.00
G Total Dwelling Units to be Weatherized and Reweatherized (from line D)	422
H Average Program Operations Costs per Unit (F divided by G)	\$7,162.69

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
WEATHERIZATION ANNUAL FILE WORKSHEET

(Grant Number: EE0007944, State: OK, Program Year: 2021)

I Average Vehicles & Equipment Acquisition Cost per Unit (from line E)	\$236.97
J Total Average Cost per Dwelling (H plus I)	\$7,399.66

IV.3 Energy Savings

Method used to calculate savings: ☒ WAP algorithm ☐ Other (describe below)			
	Units	Savings Calculator (MBtus)	Energy Savings
This Year Estimate	422	29.3	12365
Prior Year Estimate	0	29.3	0
Prior Year Actual	0	29.3	0

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

Anna Politano	Type of organization: Utility Contact Name: Phone: 4057610289 Email: editor@okl.coop
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
Mary Jackson	Type of organization: Utility Contact Name: Phone: 9185992325 Email: majackson@aep.com
Oklahoma Association of Community Action Agencies	Type of organization: Local agency Contact Name: Phone: 4059491495 Email: executivedirector@okacaa.org
Palma Lough	Type of organization: Utility Contact Name: Phone: 4053592514 Email: plough@ompa.com
Teri Green	Type of organization: Utility Contact Name: Phone: 4055521802

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
WEATHERIZATION ANNUAL FILE WORKSHEET

(Grant Number: EE0007944, State: OK, Program Year: 2021)

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

01/19/2021 A virtual public hearing via Zoom was held on January 19, 2021 at 1:00 pm. Public hearing notification was sent via GovDelivery on January 4, 2021, 15 days prior to the hearing to be held on January 19, 2021. ODOC already published (on December 28, 2020) an article on its website. Notification of the website article will also be included in the periodic New Pioneer newsletter (ODOC's official newsletter to the public). A copy of the proposed PY21 state plan will be posted on ODOC's website during the entire public comment period of January 5 – 19, 2021. GovDelivery Public Hearing Notices and copies of ODOC's website/New Pioneer are included as SF-424 attachments to this Plan. The public hearing was recorded (can be accessed here: <https://storcloud.ok.gov/index.php/s/JHGgAiaG1sxiDJx>). A written transcript is also included in the SF-424 attachments. A webinar was held with the network on January 13, 2021 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

As of the date of this application, the following counties remain unserved due to no application from other current Subgrantees to serve these counties.

Creek
Lincoln
Pawnee
Osage
Tulsa (1/2 of the allocated award, the other 1/2 is served by Community Action Resource Development)

These counties remain unserved as of June 2020 due to Deep Fork relinquishing their program.

Pottawatomie
Hughes
Okfuskee
Seminole
Okmulgee
McIntosh

ODOC has postponed re-bidding the entire state until PY2023. It does not appear that our network has the capacity to take on all unserved counties. We will need to figure out a short term innovative solution until we are able to rebid the state. We welcome DOE's suggestions and input. ODOC wants to ensure all counties are served as soon as possible.

PY 2021 ASCI Action Plan and ACSI Slide Deck (from a Network Presentation held October 2020) is attached to SF-424.

For PY21, ODOC held two virtual PAC meetings - one on December 3, 2020 and one on January 7, 2021.

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

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
STATE PLAN/MASTER FILE WORKSHEET

(Grant Number: EE0007944, State: OK, Program Year: 2021)

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

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 is required 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 20-3- 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 20-3 Section C. Gross Income is to be used, not Net Income." ODOC will follow WPN 21 – 3 when available.

See [CAA Implementation Manual Requirement 301, Section II A\[1\]](#)

[1] Full link to CAA manual - https://www.okcommerce.gov/assets/files/grants/CAA_Contractor_Implementation_Manual.pdf

Describe what household eligibility basis will be used in the Program

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

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

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

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

Weatherization Applicants are required to provide either a Social Security Number or residency paperwork to apply for the program.

[See CAA Implementation Manual, Requirement #103, Affirmative Action Requirements.](#)

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

Here are the procedures for Application Processing:

1. Subgrantee agencies shall use the Weatherization Assistance Program Application [Form 22] to determine eligibility of the applicant (which includes income verification).
2. If the applicant has no evidence of income, or no-income, the Subgrantee Recipient must collect a Notarized Certification of Zero Income Form from the applicant [Form 34].
3. Supporting Documentation- For purpose of review and audit, each file must contain an application from the client that contains the required demographics and income for the entire family living in the residence. The demographics should include the same information as what is included on the Weatherization DOE Quarterly report (age, disabled, blind, race -Native American, children, high residential energy user, household with high-energy burden) and this

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
STATE PLAN/MASTER FILE WORKSHEET

(Grant Number: EE0007944, State: OK, Program Year: 2021)

data must be collected and included in each client file.

4. If the applicant is eligible, Subgrantee agencies shall prepare a Weatherization Needs Assessment/Priority System [Form 23]. Ineligible applicants must be notified in writing with a Weatherization Denial/Deferral Form [Form 33]. If the initial assessment indicates a need for the applicant to remedy an issue, the applicant must be notified with a Deferral of Service [Form 33].
5. The application should then be reviewed by internal review procedures, selected for service, and prioritized based upon need.
6. Also maintained in the client file is owner and rental documentation.

[See CAA Implementation Manual, Requirement #301 and #304, Section II.D- Procedures for Application Processing & Client Files](#)

Describe Reweathering compliance

All Contracts: Subgrantee Recipient 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 re-weatherized units 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.**

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

**ODOC will be updating guidance and provide training to Subgrantee recipients to allow for the new 15 year rolling re-weatherization option (completed by any Federal Funding source) sometime within PY21 (anticipated by October 1, 2021). Guidance has not yet been updated as of the due date of State Plan submission.

Describe what structures are eligible for weatherization

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

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

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

Historic Preservation: Oklahoma WAP has a signed SHPO Programmatic Agreement (PA) dated 10/5/2020. 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.

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

Describe how Rental Units/Multifamily Buildings will be addressed

Oklahoma has DOE approval to weatherize 2 – 4 unit buildings, using Single Family Audit policies and procedures. Oklahoma is NOT approved to weatherize any small or large multifamily units (5+ unit buildings). Small unit buildings (duplexes, three, and four units) must receive ODOC written pre authorization on the

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
STATE PLAN/MASTER FILE WORKSHEET

(Grant Number: EE0007944, State: OK, Program Year: 2021)

energy audit prior to beginning any work on the home. 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 recipient may weatherize a building containing rental dwelling units where:

- The Subgrantee recipient has obtained the written permission of the owner or owner's agent;
- 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.

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

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

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
STATE PLAN/MASTER FILE WORKSHEET

(Grant Number: EE0007944, State: OK, Program Year: 2021)

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 DEFERRAL/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.

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.

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
STATE PLAN/MASTER FILE WORKSHEET

(Grant Number: EE0007944, State: OK, Program Year: 2021)

- 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/sfixhs

[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 eleven (11) local Subgrantee Agencies – serving sixty-seven (66.5) out of seventy-seven (77) counties. Ten and one half (10.5) 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 another Request for Proposal to release early January or February 2021.

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
STATE PLAN/MASTER FILE WORKSHEET

(Grant Number: EE0007944, State: OK, Program Year: 2021)

V.3 Priorities

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. Subgrantee Recipients 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 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.

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 11 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\[1\]](#). ODOC has started the process of updating our field guides for PY21. We anticipate being able to submit a new Single Family and Mobile Home field guide for DOE's approval by early April 2021.

Oklahoma annually updates policies and procedures when changes are made to DOE programmatic guidance. Subgrantee agreements and vendor contracts align with current DOE guidance and SWS.

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
STATE PLAN/MASTER FILE WORKSHEET

(Grant Number: EE0007944, State: OK, Program Year: 2021)

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 Renewable 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.

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
STATE PLAN/MASTER FILE WORKSHEET

(Grant Number: EE0007944, State: OK, Program Year: 2021)

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.

To comply with the requirement outline in WPN 19-4 (Section 2), once the updated version of the NEAT and MHEA audit tool (version 10) is migrated to the web and approved for use by DOE (as notified by DOE WAP Memo 74), ODOC will transition to the online version (v10) in PY22. To aid in the transition ODOC is planning to coordinate with an IREC accredited training center to provide a Comprehensive training which will at minimum cover WA v10 setup/use. Projected transition/ T&TA timeline targets are as follows:

- March - June 2021
 - Review Conversion Curriculum when released to aid in determining what will be required to convert to WA v10
 - ODOC will coordinate with an IREC accredited training center and will submit input to ORNL for development of Core Curriculum
- September 2021
 - Review Core Curriculum once released and start coordination with IREC training facility to develop the Comprehensive training which will at minimum cover WA v10 setup/use
 - Review COVID status to determine best suited training delivery method, i.e. virtual, regional classroom, network-wide classroom, or combination and projected time frame to determine if adjustments are necessary
- October - November 2021
 - Development of the WA v10 Comprehensive training and materials in coordination with IREC accredited training center
 - ODOC staff will attend ORNL train-the-trainer event
 - Begin ODOC WAP transition to WA v10
- December 2021
 - Review Comprehensive training & finalize implementation plan/schedule
 - Review COVID status to determine best suited training delivery method, i.e. virtual, regional classroom, network-wide classroom, or combination and projected time frame to determine if adjustments are necessary
 - Review ODOC WAP Energy Audit Policy and Procedures Manual and edit for any needed updates (formatting, pictures, hyperlinks, references)
 - ODOC will determine if the transition to WA v10 resulted in changes to audit procedures previously approved by DOE and require a new submittal/approval. (e.g., new materials, itemized cost procedures, etc.)
 - Submit Energy Audit Approval and edited ODOC WAP Energy Audit Policy and Procedure Manual (if needed)
- Jan - March 2022
 - Provide Comprehensive trainings in joint coordination with IREC approved facility and implement the new WA v10 energy audit for all subgrantees as outlined in the implementation plan/schedule determined in Dec
 - Review COVID status to determine best suited training delivery method, i.e. virtual, regional classroom, network-wide classroom, or combination and projected time frame to determine if adjustments are necessary
 - Conduct in-person/virtual meetings to clarify any questions and provide any needed additional T&TA
- April 2022
 - Full transition and implementation of WA v10 for all subgrantees in ODOC WAP network

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, 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 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 requires in CAA Manual Requirement 311, that all QCIs must receive their Building Performance Institute certification within 12 months of hire and must keep up with their 30 hours of required BPI continuing education units. No QCI may complete final inspections without a BPI certification.

As outlined in 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

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
STATE PLAN/MASTER FILE WORKSHEET

(Grant Number: EE0007944, State: OK, Program Year: 2021)

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.

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.

V.7 Health and Safety

ODOC is requesting a 15% H&S budget.

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 2021. 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 (Requirement 307) is available online in [ODOC's Community Action Agency Implementation Manual](#).

Pandemic H&S policy and guidance can be found here in ODOC WPN 20-3 <https://www.okcommerce.gov/community-development/community-action-agencies/weatherization-assistance-program-wap/>.

V.8 Program Management

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
STATE PLAN/MASTER FILE WORKSHEET

(Grant Number: EE0007944, State: OK, Program Year: 2021)

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, an Energy Efficiency Quality Assurance Specialist (technical monitoring) and Program Representatives/Monitors (programmatic, administrative, and fiscal monitoring). The team is also responsible as a pass through for the LIHEAP program.

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 19, 2021. Members of the public were invited to provide written or oral comments on the Weatherization Assistance Program and proposed changes for PY 21, 14 days prior to the hearing.
3. Subgrantee Recipients were invited to attend a virtual input session on December 9, 2020, prior to the PY21 draft. A recording of this session was sent to our network along with any comments received.
4. 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 196

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

V.8.2 Administrative Expenditure Limits

Per DOE WAP Memo 075, ODOC has budgeted 15% for administrative purposes - 7.5% allocated for ODOC use and 7.5% for Subgrantee Recipients. Oklahoma will provide up to an additional 5% for administrative purposes to those Subgrantee Recipients who receive less than \$350,000 of DOE appropriated funds.

ODOC updating our Subgrantee policies and contracts to reflect this change (from the previous 10%) before April 1, 2021.

V.8.3 Monitoring Activities

Subgrantee Recipients and ODOC are collectively responsible for ensuring quality of work. First, all Subgrantee Recipients 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 are (3) three Program Representatives positions assigned to specific Subgrantee Recipients and the Oklahoma Association of Community Action Agencies for the purposes of administrative monitoring and the provision of technical assistance.

Annually, in the fourth quarter of each program year, program representative(s) conduct administrative, programmatic, and fiscal monitorings (either onsite or via desktop monitoring) of all Subgrantee Recipients. Comprehensive monitorings include the following programmatic, fiscal, and administrative reviews.

- financial records

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
STATE PLAN/MASTER FILE WORKSHEET

(Grant Number: EE0007944, State: OK, Program Year: 2021)

- 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 Recipient. 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.

For PY2021, the Weatherization Program Manager is working on improved documentation of the analysis of monitoring reports as per WPN 20-4.

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.

If DOE provides approval for PY2020 Virtual QA and In-Progress Inspections, ODOC would continue to do virtual monitorings in PY21 as appropriate.

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. 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), 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 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 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 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 three (3) Program Representatives 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 2021 Weatherization Subgrantee Recipients and the Oklahoma Association of Community Action Agencies. All of these scheduled monitorings include administrative, programmatic, and fiscal monitoring. These monitorings may be onsite or desktop depending on the risk assessment and/or the public health situation. Technical monitoring schedules are completed based on agency production schedules, but at least one (1) quality assurance visits will happen at the same time as the administrative, programmatic, and fiscal monitoring per the schedule below:

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

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
STATE PLAN/MASTER FILE WORKSHEET

(Grant Number: EE0007944, State: OK, Program Year: 2021)

- DFCAF –March 2022
- INCA- March 2022
- Great Plains- March 2022
- K1 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 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.

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
STATE PLAN/MASTER FILE WORKSHEET

(Grant Number: EE0007944, State: OK, Program Year: 2021)

V.8.4 Training and Technical Assistance Approach and Activities

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 **Subgrantee T&TA Policy_PY21 in the SF-424 Attachments** for complete anticipated PY21 policy to complement the plan outlined below.

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 Subgrantee Recipients, any IG reports (if applicable), and ASCI feedback for both Subgrantee Recipients 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 (11) BPI certified QCIs among the 11 Subgrantee Recipients. OKACAA has one BPI certified QCI on staff. ODOC also employs a QCI – for a total of 13 QCIs available to the network. ODOC requires that Subgrantee Recipients upload their QCI certification(s) with each grant application. The 2021 training plan for Oklahoma weatherization is below. Additional trainings will be scheduled as required by ODOC.

PY21 will be the third year of our competitively procured contract with CHP Energy Solutions, to provide Energy Audit focused training and technical assistance for our network. We are working with CHP on the following projects for PY21:

- Monthly webinars
- Technical remote energy audit consultation
- NEAT/MHEA Library Cost Library State Standardization
- Energy Audit Monitoring Red Flag Checklist for Non-Technical Monitors and Subgrantee Program Managers/Staff

PY21 Training Plan

See OKACAA PY21 Training Calendar, and attachment in the SF424 for a copy of the most current tentative OKACAA training calendar.

Below is a list of trainings in development (either by ODOC or by ODOC in partnership with OKACAA) . Subgrantee Recipients attendance is mandatory only for comprehensive and specific training as per our Requirement 311. ODOC Staff is strongly encouraged to attend at least 1 national conference.

SUBGRANTEE

- Program Manager Training for New Program Mangers
- Time Management
- Web based NEAT/MHEA Training Based on Field Observations (during in-progress or quality assurance inspections)
- Program Manager Training for Program Mangers
- ODOC Policies and Procedures
- Energy Audit Field Mentoring Program, which would include an Oklahoma state specific certification for all Energy Auditors
- HVAC Training
- Client Education and Customer Satisfaction
- Program Outreach
- Burnout
- Agency Self-Assessment of Program Capacity
- Application and Wait List Discussion Streamlining and Optimizing Technology in Weatherization
- Management of ACPUs and Production Plans
- Field Guide and Updated SWS 2021 Training – Mobile Home and Site Built

ODOC STAFF

- NASCSP Conferences
- Energy Out west

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
STATE PLAN/MASTER FILE WORKSHEET

(Grant Number: EE0007944, State: OK, Program Year: 2021)

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

WORKFORCE CREDENTIALS

Annually, ODOC requires all Subgrantee Recipients to upload a Training Plan, which includes identification of all staff positions, training and workforce certification verification, and self-identified training needs (**see the PY20 Subgrantee Training Form attached in the SF-424 for a copy of the PY2020 required form.** Please note the PY2021 form has not been developed, but it will likely be similar). These training plans are monitored by Program Representatives and/or the Program Manager twice annually – once during Subgrantee Recipient application submission and once during monitoring. Any Subgrantee Recipients found to not be meeting training requirements will be held accountable, including, but not limited to, a probationary period or payback of funds used 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.

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 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.

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 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.

ODOC does not currently compare productivity and energy savings between Subgrantees or use this in development in T/TA activities. ODOC will plan on putting together a report for the network and scheduling a webinar to present Fall 2021. ODOC is also actively working on a procuring a new data software tool to help us better analyze our data in PY21.

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

Percent of overall trainings

Comprehensive Trainings:	75.0
Specific Trainings:	25.0

Breakdown of T&TA training budget

U.S. Department of Energy
WEATHERIZATION ASSISTANCE PROGRAM (WAP)
STATE PLAN/MASTER FILE WORKSHEET

(Grant Number: EE0007944, State: OK, Program Year: 2021)

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 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 Subgrantee Recipients 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 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.