

BUDGET INFORMATION - Non-Construction Programs

1. Program/Project Identification No. EE0010010		2. Program/Project Title Weatherization Assistance Program: Bipartisan Infrastructure Law	
3. Name and Address STATE OF OKLAHOMA 900 N. Stiles OKLAHOMA CITY, OK 731043234	4. Program/Project Start Date 07/01/2022		
	5. Completion Date 06/30/2027		

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. Federal	81.042	\$ 0.00		\$ 42,330,032.00		\$ 42,330,032.00
2.						
3.						
4.						
5. TOTAL		\$ 0.00	\$ 0.00	\$ 42,330,032.00	\$ 0.00	\$ 42,330,032.00

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) GRANTEE ADMINISTRATI ON	(2) SUBGRANTEE ADMINISTRATI ON	(3) GRANTEE T&TA	(4) SUBGRANTEE T&TA	
a. Personnel	\$ 798,950.00	\$ 0.00	\$ 250,000.00	\$ 0.00	\$ 1,048,950.00
b. Fringe Benefits	\$ 399,475.00	\$ 0.00	\$ 125,000.00	\$ 0.00	\$ 524,475.00
c. Travel	\$ 356,000.00	\$ 0.00	\$ 39,000.00	\$ 0.00	\$ 395,000.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 50,000.00	\$ 0.00	\$ 50,000.00
e. Supplies	\$ 15,500.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 15,500.00
f. Contract	\$ 1,177,229.00	\$ 3,174,752.00	\$ 6,580,349.00	\$ 240,000.00	\$ 39,734,709.00
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	\$ 2,747,154.00	\$ 3,174,752.00	\$ 7,044,349.00	\$ 240,000.00	\$ 41,768,634.00
j. Indirect Costs	\$ 427,598.00	\$ 0.00	\$ 133,800.00	\$ 0.00	\$ 561,398.00
k. Totals	\$ 3,174,752.00	\$ 3,174,752.00	\$ 7,178,149.00	\$ 240,000.00	\$ 42,330,032.00
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	\$ 42,330,032.00	\$ 0.00	\$ 42,330,032.00

SECTION B - BUDGET CATEGORIES					
6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) PROGRAM OPERATIONS	(2) HEALTH AND SAFETY	(3) VEHICLES AND EQUIPMENT	(4) LIABILITY INSURANCE	
a. Personnel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 1,048,950.00
b. Fringe Benefits	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 524,475.00
c. Travel	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 395,000.00
d. Equipment	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 50,000.00
e. Supplies	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 15,500.00
f. Contract	\$ 23,925,110.00	\$ 4,067,269.00	\$ 500,000.00	\$ 35,000.00	\$ 39,734,709.00
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	\$ 23,925,110.00	\$ 4,067,269.00	\$ 500,000.00	\$ 35,000.00	\$ 41,768,634.00
j. Indirect Costs	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 561,398.00
k. Totals	\$ 23,925,110.00	\$ 4,067,269.00	\$ 500,000.00	\$ 35,000.00	\$ 42,330,032.00
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	\$ 42,330,032.00	\$ 0.00	\$ 42,330,032.00

SECTION B - BUDGET CATEGORIES

6. Object Class Categories	Grant Program, Function or Activity				Total (5)
	(1) FINANCIAL AUDITS	(2)	(3)	(4)	
a. Personnel	\$ 0.00				\$ 1,048,950.00
b. Fringe Benefits	\$ 0.00				\$ 524,475.00
c. Travel	\$ 0.00				\$ 395,000.00
d. Equipment	\$ 0.00				\$ 50,000.00
e. Supplies	\$ 0.00				\$ 15,500.00
f. Contract	\$ 35,000.00				\$ 39,734,709.00
g. Construction	\$ 0.00				\$ 0.00
h. Other Direct Costs	\$ 0.00				\$ 0.00
i. Total Direct Charges	\$ 35,000.00				\$ 41,768,634.00
j. Indirect Costs	\$ 0.00				\$ 561,398.00
k. Totals	\$ 35,000.00				\$ 42,330,032.00
7. Program Income	\$ 0.00				\$ 0.00

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IV.1 Subgrantees

Subgrantee (City)	Planned Funds/Units
Community Action Agency of OKC and Oklahoma/Canadian County, INC (Region 1) (Oklahoma City)	\$8,121,304.00 801
Community Action Development (Region 3) (Frederick)	\$4,284,676.00 423
Community Development Support Association (Region 6) (Enid)	\$4,334,121.00 428
KI BOIS Community Action Foundation (Region 4) (Stigler)	\$3,556,919.00 351
LIFT Community Action Foundation (Region 5) (Hugo)	\$2,949,387.00 291
Northeast OK Community Action Foundation (Region2) (Jay)	\$8,730,724.00 861
Total:	\$31,977,131.00 3,155

IV.2 WAP Production Schedule

Weatherization Plans	Units
Total Units (excluding reweatherized)	3,155
Reweatherized Units	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 \$500,000.00
B	Total Units Weatherized 3,155
C	Total Units Reweatherized 0
D	Total Dwelling Units to be Weatherized and Reweatherized (B + C) 3,155
E	Average Vehicles & Equipment Acquisition Cost per Unit (A divided by D) \$158.48
AVERAGE COST PER DWELLING UNIT (DOE RULES)	
F	Total Funds for Program Operations \$23,925,110.00
G	Total Dwelling Units to be Weatherized and Reweatherized (from line D) 3,155
H	Average Program Operations Costs per Unit (F divided by G) \$7,583.24
I	Average Vehicles & Equipment Acquisition Cost per Unit (from line E) \$158.48
J	Total Average Cost per Dwelling (H plus I) \$7,741.71

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	3155	29.3	92442
	Prior Year Estimate	422	29.3	12365
	Prior Year Actual	164	29.3	4805

Method used to calculate savings description:

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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

Amanda Ewing	Type of organization: Local agency Contact Name: Phone: 4055851952110 Email: amanda.ewing@okacaa.org
Angela Jestice	Type of organization: Unit of State Government Contact Name: Phone: 4055623931 Email: gadengreg@gmail.com
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.letran@okdhs.org
Crystal LeFlore	Type of organization: Utility Contact Name: Phone: 4056239314 Email: crystal.leflore@onegas.org
Erich Font	Type of organization: Non-profit (not a financial institution) Contact Name: Phone: 4055952803 Email: erich.font@cohfh.org
Jennifer Pendley	Type of organization: Contact Name: Phone: 4056239314 Email: jennifer.pendley@oem.org
Mary Jackson	Type of organization: Utility Contact Name: Phone: 9185992325 Email: majackson@aep.com
Palma Lough	Type of organization: Utility Contact Name: Phone: 4053592514 Email: plough@ompa.com
Wanda DeBruler	Type of organization: Other Contact Name: Phone: (405)396-2032 Email: wanda@debrulerinc.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
09/07/2022	An in-person public hearing (with a virtual option via Zoom) will be held on September 7, 2022, at 9:30 AM. Public hearing notification was sent via GovDelivery on August 3, 2022, 36 days prior to the hearing being held on September 7, 2022. On August 3, 2022, ODOC

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published notification on its website. Notification of the website announcement is also included in the periodic New Pioneer newsletter (ODOC's official newsletter to the public). A copy of the proposed WAP BIL State Plan was posted on ODOC's website during the entire public comment period of August 23, 2022, to September 7, 2022. GovDelivery Public Hearing Notices and copies of ODOC's website/New Pioneer are attached and submitted in Page .

IV.7 Miscellaneous

Below is the BABA language from ODOC's contract language with our Subgrantees:

Subrecipients shall ensure that all projects comply with Section 70914 of the Buy American, Build America Act, including by the incorporation of the Buy America Preference in the terms and conditions following Buy America preference : (1) All iron and steel used in the project are produced in the United States. This means all manufacturing processes, from the initial melting stage through the application of coatings, occurred in the United States. (2) All manufactured products that are mined, produced, or manufactured in the United States is greater than 55 percent of the total costs of all components of the manufactured product, unless another standard for determining the minimum amount of domestic content of the manufactured product has been established under applicable law or regulation.

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, Director of Energy & Empowerment Programs

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

First of all, ODOC would like for DOE to know that the new regions of the state for WAP and WAPBIL have been created. The Network's professional organization was briefed on this at multiple occasions and is supportive of the change. They also worked toward the creation of the regions.

Oklahoma will be working on a Multifamily unit policy in 2023-2024. Davis Bacon would not apply to OK WAP BIL programs as we do not weatherize more than 4 units at this time. Once the MF policy is approved by the Network and our PO, we will implement the David-Bacon requirements below. Our Network is well aware of the requirements of the law and will be working on wage and salary alignment with related industries.

Davis Bacon Act Compliance "Section 41101" ODOC will ensure future policy (implemented once DOE has approved ODOC's multi-family policy) includes an overview on how the Davis-Bacon requirements will be incorporated into the program management and accounting/tracking systems to ensure all laborers and mechanics employed by contractors and subcontractors on multifamily building projects with not fewer than 5 units funded directly by or assisted in whole or in part by and through the Federal Government pursuant to the BIL shall be paid wages at rates not less than those prevailing on projects of a character similar in the locality as determined by the Secretary of Labor.

ODOC does not currently allow for fuel switching. ODOC will seek policy approval to do fuel switching once the policy is drafted (as part of PY23 State Plan) and DOE has approved the fuel switching policy and examples we submit.

Subgrantee DOE WAPBIL Input/Planning Meeting

Before the public hearing, an in-person meeting (with a virtual option via Zoom) was held on August 24, 2022, at 11:00 AM with the Subgrantees. This meeting was held in collaboration with the WAPBIL Network's professional organization (OWHAC). Regions that have been established were discuss and the entire state plan for WAPBIL. Great questions came out of the discussion with manager, financial officers and exec. directors.

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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

1. During the application process, Subrecipients must review the income supporting documentation for each household and determine whether the applicant household is eligible through at least one of the following methods:
 1. Subrecipients Eligibility Determined. Review each application to verify a household (the applicant and all occupants over the age of 18) are at or below 200 percent (200%) of the poverty level (200% Poverty Tables will be updated and made available to the Subrecipients Qualified supporting income documentation, which must be kept in the client file, includes, at a minimum:
 1. At least 3 months (or more) of income supporting documentation (from the past applicable tax year) (see Section 5 for a list of eligible income documentation), annualized (see Section 3 for description of how to “annualize income”).
 2. 12 months of actual income documentation.
 2. Eligibility Determined by an Outside Agency/Program. If an applicant has been determined eligible for another government or state low-income family program and can produce supporting documentation verifying their qualification for this program within the last 12 months, a Subrecipients may accept any document used to determine eligibility as evidence of client eligibility for the 22 WAPBIL program. This third-party eligibility documentation must be kept in the client file. Here is a list of programs currently allowed:
 1. Low Income Home Energy Assistance Program – Utility Assistance
 2. U.S. Department of Housing and Urban Development – Section 8 or Public Housing
 3. Social Security Act, Title IV – Grants to States for Aid and Services to Needy Families with Children and for Child Welfare Services
 4. Social Security Act Title XVI – Supplemental Disability Security Income
 5. HUD means-tested programs are categorically income eligible. Certification that applicants have met the income requirements
 3. Self-Certification. Once all avenues of documenting income are exhausted, self-certification is allowable. A notarized statement signed by the potential applicant indicating that the applicant has no other proof of income must be kept in the client file [Form 34].
2. Annualization of Income. Where an applicant cannot provide income verification for the entire 12 months of an applicable tax year, their partial income and supporting documentation (minimum of 3 months) may be annualized to determine eligibility.
 1. Applicant must provide at least 3 months of qualified supporting documentation (see Attachment B).
 2. Subrecipients calculates as follows:

12 months / _____ months of documentation = multiplier

multiplier X sum of income provided = annualized income
3. Income Recertification. An applicant must be re-certified every 12 months (from date of energy audit), if eligibility lapses due to the length of time the applicant was waiting to receive Weatherization services. Recertification must be documented on the application [Form 22], by either
 1. Writing in the new verified income and referencing the new supporting documentation with a staff initial and date OR
 2. Verifying previous income is still current with a staff initial and date.

It is not necessary for a Subrecipients to have the applicant complete a new application simply for the purposes of income recertification. A new application is only necessary when the application has been updated for other policy reasons.

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4. Qualified Supporting Documentation.
 1. Bank Statements,
 2. Paycheck Stubs,
 3. Receipts from a Person's own Business or from an Owned or Rented Farm after Deductions for Business or Farm Expenses,
 4. Check stubs from certain court ordered payments or federal or state programs,
 5. Royalty statements,
 6. Estate or Trust Receipts,
 7. Lottery Winnings documentation,
 8. Retirement Check stubs

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

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.

V.1.2 Approach to Determining Building Eligibility

Procedures to determine that units weatherized have eligibility documentation

1. Clients and units eligible for weatherization may not receive funding for weatherization using both WAP and WAP BIL funds. The client and unit must be determined to be eligible under either WAP or WAP BIL. These funds cannot be braided with each other. Other funds not related to WAP or WAP BIL may be braided but Subrecipients must assure they are following the correct guidance.
2. Subrecipients shall use the Weatherization Assistance Program Client Application [Form 22] to determine eligibility (which includes income verification).
3. If the applicant has no evidence of income, or no-income, the Subrecipient must collect a Notarized Certification of Zero Income Form from the applicant [Form 34].
4. Each file must contain a current application (within the last 12 months from the date of energy audit initiation) from the client that contains the required demographics and income for the entire family living in the residence. The demographics must include the same information as what is included on the Weatherization Department of Energy Quarterly report (age, disabled, blind, race -Native American, children, high residential energy user, household with high-energy burden) and this data must be collected and included in each client file.
5. If the applicant is determined to be income/household eligible, Subrecipients shall prepare a Weatherization Needs Assessment/Priority System [Form 23]. Ineligible applicants must be notified in writing with a Weatherization Denial [Form 24] /Deferral Form [Form 33]. All deferred applicants must follow ODOC's deferral policy. If the initial assessment indicates a need for the applicant to remedy an issue, the applicant must be notified with a Deferral of Service [Form 33].

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6. The application must then be reviewed by internal review procedures, selected for service, and prioritized based upon need using the assigned priority points.
7. Subrecipient must ensure that the homeowner sign authorization for weatherization, either as the Occupant [Form 30] or as providing permission for the Tenant (as the Renter) to receive the services. [Form 29]

Describe Reweathering compliance

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

1. When a dwelling unit has been damaged by fire, flood or an Act of God and repair of the damage to weatherization material is not paid for by insurance; AND
2. Any dwelling units weatherized (including dwelling units partially weatherized) under DOE WAP, or under other Federal programs, until the date is fifteen years after the date such previous weatherization was completed, from the date of the proposed new energy audit initiation.

Subrecipients may not weatherize a unit which is designated for acquisition or clearance by a federal, state or local program within 12 months from the date weatherization of the dwelling unit would be scheduled to be initiated (energy audit).

Subrecipients will be required to keep track of all re-weatherized homes on a separate spreadsheet to be submitted to ODOC each quarter, until ODOC has finalized procurement of the new weatherization database software program.

Describe what structures are eligible for weatherization

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

With written approval from ODOC (who will also seek DOE approval), Subrecipient may weatherize shelters that comply with the definitions below:

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

Historic Preservation: Oklahoma WAP has a signed SHPO Programmatic Agreement (PA) dated 3/29/2010, which expired December 31, 2020. It was recently extended through December 31, 2030. The PA lists exempt activities/undertakings generally conducted in the process of weatherizing homes through Oklahoma WAP, which have been determined to have no potential to cause effects on historic properties.

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 shall not weatherize any larger multifamily units (5+ unit buildings), nor does Oklahoma have any DOE approved multifamily energy audit policies and procedures to do so. By 2024, ODOC plans to submit energy audit procedures for multi-family housing above four homes.

Every energy auditor must receive ODOC written preauthorization on the energy audit and income documentation for any small multifamily unit buildings (duplexes, three, and four units) prior to beginning any work on the home, until ODOC has determined competency of the energy auditor and the Subrecipient in completing small multifamily units. 2-4 unit buildings are eligible to be audited and submitted to ODOC for approval as long as;

Not less than 66 percent (50 percent for duplexes and four-unit buildings) of the dwelling units in the building are eligible, or will become eligible dwelling units

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within 180 days under a federal, state, or local government program for rehabilitating the building or making similar improvements to the building;

A Subrecipient may weatherize a building containing rental dwelling units where:

1. The Subrecipient has obtained the written permission of the owner or owner's agent [Form 29];
2. The Subrecipient has gathered supporting documentation to ensure that
 1. 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;
 2. For a reasonable period of time, which is defined as a period of three years, after weatherization work has been completed on a dwelling containing a unit occupied by an eligible household, the tenants in that unit (including households paying for their energy through their rent) will not be subjected to rent increases unless those increases are demonstrably related to matters other than the weatherization work performed.

Tenants may file a complaint first with the local Community Action Agency then with the Oklahoma Department of Commerce/Office of Community Development if the complaint is not resolved. The owners must demonstrate that the rent increase concerned is related to matters other than the weatherization work performed. All Subrecipients are required to maintain a weatherization client and applicant appeals procedures.

No undue or excessive enhancement shall occur to the value of the dwelling units. The expenditures allowed under the Weatherization Assistance Program help focus enhancements on those that provide weatherization benefits. For example, repairs to a dwelling unit must be necessary to make the installation of weatherization materials effective.

Describe the deferral Process

Deferring work on a home is a difficult, but sometimes a necessary decision. This does not mean that assistance will never be provided, but that work must be postponed until the problems can be resolved by the applicant or client and/or alternative sources of help are found. Subrecipients, 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. Subrecipients should review Health and Safety and resolve any allowable Health and Safety issues that are identified in a client home, provided they are within their budget. A list of possible program referrals is provided under V. References.

Number 25 **Upload** (ODOC Deferral Policy) and Form 33 (Deferrals) were uploaded and will answer the question that is presented here to a higher level as requested.

V.1.3 Definition of Children

Definition of children (below age): **19**

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

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

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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 six (6) local Subrecipient Agencies – serving sixty-seven (66.5) out of seventy-seven (77) counties. ODOC is restructuring the weatherization program. By the time this is complete, there will be six subrecipients (potentially more) serving all 77 counties. ODOC anticipates there will not be any unserved counties.

ODOC distributed a statewide competitive Request for Information on July 27, 2022. The restructuring will allow for more sustainable and successful service areas. It will be released to the existing Network and public for solicitation in late Fall 2022 and in time for new awards. We do not plan to issue awards until January 1, 2023.

V.3 Priorities

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

- Person(s) age 65 and over
- Any Aged Person with a Disability
- Families with children under 19 years of age
- High Residential Energy User
- Households with High Energy Burden

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

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. Subrecipients are allowed to choose the oldest application certification date in order to reach high priority clients, within the same high-risk categories.
4. Applications may be selected in order to coordinate weatherization services with another funding source.
5. Applications are income recertified every 12 months, and their waiting list application date is updated based on the income recertification date.

V.4 Climatic Conditions

For the past few years (2017 - 2022), ODOC has used the following climatic information from NOAA. However, ODOC now understands that while this statewide data is helpful, ODOC needs climatic conditions by weather station according to the energy audit tool. ODOC is putting together a chart of all approved weather stations used for Oklahoma in NEAT/MHEA and will upload into PAGE upon completion.

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.

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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 Subrecipients are required to follow the ODOC Energy Audit Procedures for all single-family units, manufactured homes, and any 2-4 multi-family units, (which are approved to be audited using Single Family procedures). Oklahoma is approved to use the Weatherization Assistant (WA) National Energy Audit Tool (NEAT), and Manufactured Home Energy Audit (MHEA) (Version 8.9). DOE gave conditional re-approval of Oklahoma’s Energy Audit Procedures on May 28, 2019. ODOC has implemented the five conditions required by DOE, and DOE provided unconditional approval of Oklahoma’s Energy Audit Policies and Procedures on December 3, 2020.

ODOC worked with Santa Fe Community College to develop a comprehensive Field Guide (to include both Mobile Home and Single-Family units this time). The new Field Guide was approved on June 7, 2021, and is effective until June 7, 2026. Hard copies of the Field Guide were mailed to all Subrecipients and an electronic copy of the Field Guide is available on [ODOC’s websites](#).

[Oklahoma Department of Commerce | Building business in OK \(okcommerce.gov\)](#)

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

Field guide types approval dates

Single-Family:
Manufactured Housing:
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:

Audit Procedure: Manufactured Housing
Audit Name: MHEA
Approval Date:

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. The conditions were all satisfied and removed on December 2, 2020. ODOC’s current energy audit procedures are approved through May 28, 2024. One of these conditions that was satisfied included the implementation of a new ODOC Policy and Procedures for Energy Audits that was required by ODOC policy on August 1, 2020. It is available on ODOC’s [website](#).

ODOC has not weatherized any multi-family houses since 2010. We do not anticipate weatherizing any multi-family units in PY22. We are approved to weatherize 2-4 unit dwellings using the single family audit. However, if for any reason ODOC does receive a request for a multi-family unit to be weatherized (5 units or more), we will submit the multi-family

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project to DOE for approval prior to the project commencing.

ODOC is planning to use 22 WAPBIL funding to contract for a vendor to help us write a multifamily policy so that we can complete more homes in the five year period of time.

V.5.3 Final Inspection

The initial Energy Auditor (EA) is an employee of the agency weatherizing the unit/home OR a qualified contracted service provider procured by the weatherization agency to complete the initial energy audit. Subgrantees in OK use both contracted EA and other agencies have them on staff as full or part-time employees.

Our weatherization agencies also employ BPI Quality Control Inspectors as employees or contracted BPI Quality Control Inspectors individuals depending on the availability of individuals depending on the availability of individuals in their Region.

ODOC Weatherization Operations Manual Requires: 45.2.2.2 If a Subgrantee's local QCI ever completes both the energy audit and the final inspection, then ODOC must perform QA Inspections on at least ten percent of the completed homes for the program year. The QCI (certified individuals) are part of the agency staff, or a third-party contractor, who was not the Crew Leader, retrofit installer, or worked (personally installed measures) in the home. They could be the Energy Auditor/Final Inspector due to limited workforce issues. This is stated as part of the QCI paperwork on ODOCs Form 44.

The QCI (certified individuals) are part of the agency staff, or a third-party contractor, who was not the Crew Leader, retrofit installer, or worked (personally installed measures) in the home. They could be the Energy Auditor/Final Inspector due to limited workforce issues. This is stated as part of the QCI paperwork on ODOCs Form 44. WOM 45.2.2.2.

FINAL INSPECTION (V.5.1)

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

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

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

QUALITY CONTROL INSPECTION PROCESS:

DOE requires every reported WAP unit to receive a final inspection by a certified QCI per WPN 22-4. ODOC identified the following process to ensure Subrecipient recipient compliance with the requirement:

1. Each client file must identify which retrofit installers, crew leaders, energy auditors, and quality control inspectors completed work on the home, and

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whether they are employed by the agency or a third party. This will ensure the state monitors and state QCI (Quality Assurance) monitor are aware of the separation of duties. If the Subrecipient recipient utilizes the same person for the audit/assessment as the final inspection, the number of weatherization units inspected will increase to at least 10%.

2. The Quality Control Report [Form 44] must be used during the final inspection.
3. In order to prepare for the final inspection, the Subrecipient Quality Control Inspector should review the following in the client file and pre-fill out the QCI Summary form prior to the final inspection.
 1. BWR/Client File Checklist
 2. Energy Audit NEAT/MHEA to review the Recommended Measures, Air Infiltration work
 3. The Energy Audit Form [Form 28] should be utilized to determine pre and post weatherization diagnostics and compared to the QCI assessments.
 4. The QCI is expected to perform and record the following diagnostics during the final inspection (on the QCI Summary Form 38) and follow ODOC and/or DOE policy regarding each test required.

All state monitored units are also to be inspected by a certified QCI. ODOC encourages the Network to collaborate with neighboring agencies to provide the QCI service, if staffing is an issue, as some smaller Subrecipients may not have the staff with the technical knowledge, or the prerequisites, to pass the QCI tests.

ODOC's training requirements (see T&TA Plan) require that all QCIs receive their Building Performance Institute certification within 12 months of hire and must keep up with their 30 hours of required BPI Continuing Education Units (CEU). No QCI is allowed to complete final inspections without a BPI certification. Weatherization Program Notice 22-4 Quality Control Inspectors A QCI is a residential energy-efficiency expert who ensures the completion, appropriateness, and quality of energy upgrade work by conducting a methodical inspection of the building including performing safety and diagnostic testing. The individual with QCI certification is essential to the quality production of weatherization units. It is required that individuals who approve Subrecipient Final Inspections and Grantee technical monitoring, must have an active QCI certification and possess skills outlined in the NREL Job Task Analysis (JTA) for QCIs.

Single Family

- The Grantee must follow a written policy/procedure for verifying final inspectors approving completed units are certified QCIs.
- The Grantee must have written policies and procedures to address situations where a QCI approves work which is not consistent with the standards adopted by the Grantee and the DOE-approved Field Guide. The policy must include increased monitoring of the Subrecipient where the inspector is employed/contracted and procedures for disciplinary action if the Grantee inspection protocols are not followed. Multifamily
- Grantee Training Plans must include requirements to ensure that individuals signing off on work in multifamily buildings have an active QCI certification and successfully complete a comprehensive training program based on the NREL Multifamily Quality Control Inspector JTA.

LOCAL QUALITY CONTROL INSPECTION OF THE ENERGY AUDIT

STATE QUALITY ASSURANCE INSPECTION REQUIREMENTS

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

Inspection forms will be consistent for all final inspections in Oklahoma WAP, including the EE QA Specialist (Quality Assurance) inspections. Form 44 will be signed by both the local and EE QA Specialist, once the QCI believes the unit meets DOE requirements (see SF 424 attachment Form 44).

ODOC will conduct Quality Assurance Inspections on 5-10% of the State's total annual production (depending on the split between the Subrecipient's auditors and QCI inspectors) and use inspection results to identify the training and technical assistance needs of the network.

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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.

BIL Program Planners and Energy Project Specialists compare Subrecipient's monthly progress reports submitted in OKGrants or the new EIS database being implemented by ODOC with each Subrecipient ODOC approved Management Plan for the entire program year. Subrecipients 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 Subrecipient 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 Subrecipient is repeatedly falling behind on production, ODOC will place the Subrecipient on a probationary period, as per their Contract Part II and use the information gathered during the probationary period to inform training and technical assistance needs the Subrecipient 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 Subrecipient and OKACAA.

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

Annually, a risk assessment is conducted for each Subrecipient to determine how effectively a Subrecipient is/has been managing their Weatherization Assistance Program, and whether monitoring and training/technical assistance might be needed.

ODOC's Weatherization Assistance Program does not have specific objectives regarding Justice 40, diversity, equity, and inclusion, but will evaluate how we can add goals into our program in PY23.

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 2022. Content from ODOC's final H&S policy was copied and pasted directly into the DOE recommended H&S template and uploaded as an attachment to this application.

ODOC H&S policy was updated on April 1, 2022, in order to be in compliance with WPM 22-7. However, DOE granted ODOC and extension on making all the changes that were required. Additional changes will be submitted with the State Plan by Oct 1, 2023.

V.8 Program Management

V.8.1 Overview and Organization

All Subrecipient program guidance for the WAP can be found online on our Weatherization Contractor Implementation [Page1](#):

In addition:

1. Each Subrecipient 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 Subrecipients 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 September 7, 2022. Members

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of the public were invited to provide written or oral comments on the ODOC Weatherization Assistance Program and proposed changes for 22 WAPBIL, 13 days prior to the hearing.

3. Subrecipients were invited to attend a virtual input session on August 24, 2022, prior to the 22 WAPBIL Oklahoma State Plan being finalized. A recording of this session was sent to our network along with any comments received.
4. In the selection of proposed Subrecipient, 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 Subrecipient to secure volunteers. Within the State of Oklahoma, all proposed Subrecipients are entities, which have, and are operating programs under these rules or the Economic Opportunity Act of 1964.

Here is an update on the ODOC Restructuring Plan:

October – July 2022	Subrecipients provided preliminary notification of award (either future award for PY23 once ODOC has received Federal award or a current award if any funding for the Infrastructure Investment and Jobs Act is available at this time.)
January – March 2023	Train any new Subrecipients and prepare RFA for Subrecipients
January 1, 2023	22 WAPBIL New Program Year with New Service Areas
January 31, 2023	Award Letters Sent

V.8.2 Administrative Expenditure Limits

Per 10 CFR 440.18(e) not more than 15% of any grant made to state may be used by the Grantee and Subrecipients for administrative purposes, not more than 7.5% may be used by the state, and not less than 7.5% must be made available to Subrecipients by the state. Monitoring Activities (V.8.3)

Subrecipients and ODOC are collectively responsible for ensuring quality of work. First, all Subrecipients are required to have 100% of all homes weatherized inspected by a BPI Certified Quality Control Inspector, as per WPN 22-4. Second, ODOC also provides additional oversight and monitoring of the program both administratively and technically. The following is ODOC's approach to monitoring:

V.8.3 Monitoring Activities

ODOC released a solicitation January 2022 to hire a qualified contractor (QCI) to assist in the completion of all quality assurance inspections for PY22 - PY26 (5 year contract). Please see uploads for additional policy on monitoring.

Subgrantee's and ODOC are collectively responsible for ensuring quality of work. First, all Subgrantee's are required to have 100% of all homes weatherized inspected by a BPI Certified Quality Control Inspector, as per WPN 22-4. Second, ODOC also provides additional oversight and monitoring of the program both administratively and technically. The following is ODOC's approach to monitoring:

Administrative, Programmatic, and Fiscal Monitoring

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

Annually, in the fourth quarter of each program year, the Energy Projects Specialists conducts administrative, programmatic, and fiscal monitorings (either onsite, virtually via a state approved video conference platform, or via desktop monitoring) of all Subgrantees (depending on risk assessment score and current pandemic status). Comprehensive monitorings include the following programmatic, fiscal, and administrative reviews.

- financial records

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- 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 energy project specialist prepares and sends a written report indicating findings and or concerns to the Subgrantee. The Subgrantee has 30 days to respond to all monitoring findings through corrective action. ODOC may ask the Subgrantee to determine their own corrective action plan to meet a requirement or may require a specific corrective action to be implemented after 60 days. If a Subgrantee Recipient fails to address a noncompliance finding, it will be reported to the DOE Project Officer. Sensitive or significant noncompliance findings will be reported to the Project Officer immediately.

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

Technical Monitoring

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

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

As part of each quality assurance inspection and any client file reviews, the EE QA Specialist will review compliance with ODOC's Policies and Procedures for Energy Audits. The EE QA Specialist will conduct a blower door test to ensure accurate levels have been reached. All units are inspected to ensure that those measures installed were installed according to the SWS, ODOC policies and procedures, RRP, and that installations followed the work described in WAP field guides, are consistent with the NEAT Output Report and the BWR/Invoices (materials).

If after inspecting a minimum 5% sampling of work completed and significant deficiencies are discovered (health and safety violations, poor quality workmanship/ installation of materials, major services missed), the Program Representative or the EE QA Specialist at ODOC will elevate the number of homes reviewed and the frequency of visitation until the deficiencies are no longer found. The monitoring visits will return to the minimum 5% samplings of the Subgrantees in subsequent visits. The Subgrantee must accomplish the corrective actions(s) and notify the EE QA Specialist and the program representative of the completion, at which time a visit will be scheduled or another alternative method of final review will be determined (such as photo documentation with detailed justification the work was completed). Additionally, the EE QA Specialist and/or Energy Project Specialist may suggest training activities, or provide technical assistance to help Subgrantees with consistent deficiencies. ODOC encourages all Subgrantees to attend Oklahoma Weatherization Training Center classes, Oklahoma Weatherization and Housing Advisory Council (OWHAC) meetings, and annual conferences to increase crew qualifications.

Monitoring Staff Budget

The Energy Projects Specialist will charge time to both the ODOC T&T/A and Administrative budget for personnel and benefits based on the job tasks completed and the time spent on those tasks. Approximately 60% of the EE QA Specialist salary will be paid out of the T&T/A budget (no administrative dollars will be charged). The remaining salary will be paid with DHS LIHEAP funds.

Monitoring Schedule Detail And Plan

Below is the tentative monitoring schedule for PY 2022 Weatherization Subgrantees and the Oklahoma Association of Community Action Agencies. All these scheduled monitorings include administrative, programmatic, and fiscal monitoring. These monitorings may be onsite or desktop depending on the risk assessment and/or the public health situation. Technical monitoring schedules are completed based on agency production schedules, but the goal is to complete at least one (1) quality assurance visit at the same time as the administrative, programmatic, and fiscal monitoring (if possible) per the schedule below:

- CAA of OKC- February 2023
- CADC – March 2023
- CARD –March 2023
- CDSA- February 2023
- Delta- January 2023
- INCA- March 2023
- Great Plains- March 2023
- KI BOIS – February 2023
- Little Dixie – March 2023

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• Northeast- February 2023

Oklahoma Association of Community Action Agencies – March 2023

Any major findings from Subgrantee Recipient monitoring visits, Quality Assurance inspections, and financial audits will be tracked to the final resolution. The Oklahoma Department of Commerce will create a tracking record that includes the: findings, success stories, recommended corrective actions, deliverables, due dates, responsible parties, actions taken, and final resolutions.

PROCESS FOR DISCIPLINE AND/OR REMOVAL OF SUBGRANTEE RECIPIENT FROM PROGRAM:

The Subgrantee Recipient has 30 days to respond to all monitoring findings through corrective action. Monitoring reports remain open and unresolved until all corrective action implementation has been verified. If a Subgrantee Recipient fails to respond to an ODOC monitoring finding of any kind, or refuses to implement some or all corrective action required within the allowed timeframe, ODOC will provide one written reminder to the Subgrantee Recipient detailing the outstanding response that is needed to close the monitoring. If the Subgrantee Recipient again does not respond or corrective action is not satisfactorily implemented within the given timeframe, ODOC will take the following action:

1. Place the Subgrantee Recipient on 60 day probationary period and withhold any further disbursement of funds.
2. Send final notice to the Subgrantee Recipient's Board President and Executive Director explaining that if corrective action is not implemented within the 60 day probationary period, ODOC will terminate the Subgrantee Recipient's current weatherization contract and all subsequent ODOC weatherization contracts for a period of at least 2 years. This termination may also include repayment of any weatherization costs that were not satisfactorily resolved.
 - a. This final notice will also remind the Subgrantee Recipient of their rights and ensure they are aware of their contractual right to dispute any grievances through a state administrative procedure.
 - b. When the program is open for bid in the future, the Subgrantee Recipient may submit a bid to provide services again.
3. Should the Subgrantee Recipient resolve the monitoring findings within the probationary period, ODOC will remove the probationary status, but the Subgrantee Recipient will remain a high-risk Subgrantee Recipient and be placed on reimbursement only for at least one program year. All high-risk agencies automatically have additional oversight and monitorings.
4. If a Subgrantee Recipient fails to resolve the monitoring findings, ODOC will send notice of program termination to the Subgrantee Recipient's Board President and Executive Director.

In the event that a Subgrantee Recipient has repeat monitoring findings two years in a row, even if monitoring findings are resolved satisfactorily within the allowed timeframe, ODOC will take the following additional action:

1. Notify the Subgrantee Recipient that they have been placed on a reimbursement only status as part of monitoring corrective action effective for one year starting 30 days from their monitoring report date.
 - a. The Subgrantee Recipient's reimbursement only status will remain until the next monitoring reflects no repeat findings.
 - b. Should the repeat findings be found again a third time, ODOC will convene an in internal ODOC review committee and consider program termination following Steps 2 – 3 below.
2. If the repeat monitoring findings involve questioned or disallowed costs, the Subgrantee Recipient will be notified that they are being placed on a probationary period for the remainder of any current contracts, in addition to being placed on a reimbursement only status. The Subgrantee Recipient will be asked to submit a letter explaining why they had repeat monitoring findings, what is being done to correct the issue so that it does not occur again, and why they should continue to operate the program.
3. After receipt of the Subgrantee Recipient letter, ODOC will convene an internal review committee to review the nature of the monitoring findings and the Subgrantee Recipient's letter to determine whether program termination is necessary due to continued poor performance.

V.8.4 Training and Technical Assistance Approach and Activities

See the BIL workbook for a workforce credential plan. See tab 3 for list of all projected positions needed to meet production requirements for BIL. Policy 42 and

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43 Training for Contractors and Training Policy has also been uploaded.

See Form in Page on workforce credentialing that ODOC uses (Training and Staffing Planning Form Appendix C ODOC. This has been uploaded in Page and is labeled upload 33, 34 and 35.

Oklahoma utilizes T&TA funds to maintain or increase the efficiency, quality and effectiveness of the Weatherization Program at all levels. Staff may not function unsupervised until training and certification requirements are met. Please see T&TA Plan in the SF-424 Attachments for anticipated 22 WAPBIL policy.

In order to plan for upcoming program year training needs, ODOC utilizes network surveys, network roundtable discussions with the Oklahoma Weatherization and Housing Advisory Council (OWHAC), ODOC monitoring results from DOE, feedback from ODOC's Project Officers, internal state audits (should any be present), monitoring of Subgrantees, any IG reports (if applicable), and ASCI feedback for both Subgrantees and ODOC Staff ODOC contracts a portion of training and technical assistance, to the Oklahoma Association of Community Action Agencies (OKACAA). OKACAA is an IREC accredited training center and provides Comprehensive and Specific trainings (on the required JTAs for Quality Control Inspector (QCI) Certification, Retrofit Installer, Crew Leader, and Energy Auditor, along with other required H&S trainings) for all weatherization staff in our Oklahoma network. Subgrantees may also receive DOE allowable training at any other IREC training center in the nation. OKACAA tracks all Subgrantee IREC and lead training certifications received from their training center and reports to ODOC quarterly to ensure maintenance of certifications and to determine further training needs.

ODOC is in the process of writing an RFP and collaborating with the IREC center here in Oklahoma to get more QCI and other certified WAP staff and licensed staff ready to join the Oklahoma Weatherization Program. ODOC is starting to work on a marketing campaign to solicit more workforce in the Oklahoma are as we have a workforce development initiative focused on increasing new employee training and existing employee training.

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

ODOC presented staffing scenarios to Subgrantees based on the increasing number of units/homes to be weatherized over the next five years. These staggering increases have required Subgrantees to begin recruiting, consider cross team collaboration with one another, and examine hiring practices that reflect a Justice 40 Equity lens.

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

22 WAPBIL TRAINING PLAN

Below is a list of trainings that are planned to be offered during 22 WAPBIL. Subgrantee attendance is mandatory for comprehensive, program manager, NEAT/MHEA, and other specific training as per our Training Requirements (see T&TA Plan). ODOC Staff is encouraged to attend at least 1 national conference.

SUBGRANTEE

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

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- Energy Audit Field Mentoring Program, which would include an Oklahoma state specific certification for all Energy Auditors
- HVAC Training
- Client Education and Customer Satisfaction
- Program Outreach
- Burnout
- Agency Self-Assessment of Program Capacity
- Application and Wait List Discussion Streamlining and Optimizing Technology in Weatherization

ODOC STAFF

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

WORKFORCE CREDENTIALS

Annually, ODOC requires all Subrecipients to upload a Training Plan, which includes identification of all staff positions, training and workforce certification verification, and self-identified training needs. These training plans are monitored by the Energy Projects Specialist and/or the Program Manager twice annually – once during Subrecipients Recipient application submission and once during monitoring. Any Subrecipients found to not be meeting training requirements will be held accountable, including, but not limited to, a probationary period or payback of funds spent on homes.

ODOC does not currently track any local contractor licensing or vendor certifications, but we will develop a process to do this in ODOC 22 WAPBIL as now procured EIS WAP LINK to be this contractor as of July 2022. EIS will collaborate with ODOC to create a weatherization database in which all contractor licensing and vendor certifications can be maintained. The new EIS WAP LINK information system will allow ODOC to gather and use data in a more timely and efficient manner.

SUBGRANTEE PRODUCTIVITY

Subrecipients 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 Subrecipients. Corrective action will be initiated by a Subrecipients Recipient missing the approved Production Schedule and Management Plan.
2. If in 30 days, the Subrecipients 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 Subrecipients 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 Subrecipients Recipient's plan of action to correct the problems, including a timeline for each activity.
5. A list of Identified T&T/A needs.

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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 Subrecipients. To receive redistributed funds, Subrecipients 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 Subrecipients 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.

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

- 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 Subrecipients Program Managers/Staff

PY22 Training Plan

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

SUBGRANTEE

- Retrofit Installer
- Crew Leader
- Quality Control Inspector
- Energy Auditor
- Beginner NEAT/MHEA
- Program Manager Training for New Program Mangers
- Continuing Education (online and classroom) NEAT/MHEA Training Based on Field Observations (during in-progress or quality assurance inspections)
- Multi Family Policies and Procedures
- ODOC Policies and Procedures
- Energy Audit Field Mentoring Program, which would include an Oklahoma state specific certification for all Energy Auditors
- HVAC Training
- Client Education and Customer Satisfaction
- Program Outreach
- Burnout
- Agency Self-Assessment of Program Capacity
- Applications and Wait Lists
- Optimizing Tech in WX

ODOC STAFF

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

WORKFORCE CREDENTIALS

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Annually, ODOC requires all Subrecipients to upload a Training Plan, which includes identification of all staff positions, training and workforce certification verification, and self-identified training needs (using an ODOC developed standardized form). These training plans are monitored by the Energy Projects Specialist and/or the Program Manger twice annually – once during Subrecipients Recipient application submission and once during monitoring. Any Subrecipients found to not be meeting training requirements will be held accountable, including, but not limited to, a probationary period or payback of funds spent on homes. ODOC does not currently track any local contractor licensing or vendor certifications, but we will develop a process to do this in PY22. We had planned to develop a process in PY2021, but realized we needed a more sophisticated database for all our weatherization needs in order to fully accomplish this and other reporting goals/needs. – ODOC has put together a solicitation for a weatherization database in which all contractor licensing and vendor certifications can be maintained. This is scheduled to be procured by the end of PY21.

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See SF-424 attachments for copy of H&S Client Education Booklet - April 2019

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

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Oklahoma will not develop an Energy Crisis Plan for PY 2022 of PY23. During the PY2021 Virtual Input Session, there was Subrecipients interest in ODOC developing an Energy Crisis Plan in future program years.

Per WPN 12-7 Revised Guidance on Disaster Relief planning, Oklahoma Subrecipients are allowed to utilize weatherization funds to assist eligible weatherization clients in various cleanup efforts or repairs, as long as the repairs/clean up are tied to weatherization work performed, including previously weatherized units if the original weatherization was conducted prior to October 1, 1994. In addition, dwelling units located in a disaster area may be considered a priority if the unit that is eligible meets one of the priorities established in regulation, is free and clear of any insurance claim, or form of compensation resulting from damage incurred from the disaster.