Technical: Achieving Accountability through Monitoring

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Monitoring activities ensure that accountability exists for program resources and provides information that can be used to improve the program's operation and services. Monitoring takes place while the program is in operation and provides oversight for the services being delivered at the local level.

Goals of monitoring include determining program compliance and accountability, analyzing program performance, and analyzing quality and effectiveness of the work on completed dwellings. Quality program monitoring will identify problems, deficiencies, and areas that need improvement, and then assist agencies in their program operations and compliance with DOE and State regulations. Monitoring is also a part of a successful training program by assessing the need for training and technical assistance to improve local agency service delivery, costeffectiveness, and accountability.

Specific DOE rules in regards to Grantee monitoring include:

The Grantee must conduct comprehensive monitoring of each subgrantee at least once a year, including monitoring must include review of client files and subgrantees records, as well as actual inspection of at least 5 percent of the completed units. Grantees are strongly encouraged to inspect additional "in progress" units in order to assess compliance with safe work practices, adherence to lead safe weatherization protocols, and other factors that are relevant to onsite, in progress reviews.

(From WAPTAC - Monitoring)

Specific DOE rules include:

The subgrantee should be briefed on the observations and findings generated by the monitoring visit, usually through an exit interview. Within 30 days after each visit, the Grantee will prepare a written report on its findings and send it to the subgrantee for corrective action, if applicable.

Specific DOE rules include:

Major findings from subgrantee monitoring visits and financial audits should be tracked by the Grantee to final resolution. DOE recommends that the tracking record developed by the Grantee include, but not be limited to: findings, including success stories, recommended corrective actions, deliverables, due dates, responsible parties, actions taken, and final resolutions.

Specific DOE rules include:

Annually the Grantee will summarize and review each subgrantee's audit, program monitoring reports and findings for internal monitoring of Grantee and subgrantee needs, strengths, and weaknesses. The results of this annual monitoring should be considered during annual planning and should be available in the Grantee Office for the PMC staff to review during their Grantee program monitoring visits.

In accordance with 10 CFR 440, K-WAP has the responsibility to perform monitoring and oversight of the program implementation and work performed by all subrecipients. This responsibility includes ensuring that grant funds are expended in accordance with applicable law, including regulations contained in 10 CFR 440; applicable OMB circulars; DOE Financial Assistance Rule 2 CFR 200 and 2 CFR 910; Weatherization Program Notices (WPN's), and other procedures that DOE may issue.

*Monitoring will assure weatherization programs are being managed within Federal and State guidelines and that eligible low-income families are receiving high-quality and appropriate weatherization of their homes.

*To fulfill this requirement KHRC will conduct comprehensive monitoring of each subrecipient at least once a year as identified in the State plan.

*Risk assessments of each agency will be conducted annually. A monitoring plan will be developed based on this information.

Programmatic and Management Monitoring

K-WAP staff will conduct a programmatic and management review during annual one to two day on-site compliance monitoring visits utilizing the Programmatic and Management Compliance Monitoring Instrument found in the WAP Subrecipient Procedure Manual. Monitoring will be completed by the Weatherization Program Manager or Field Specialist.

Training and Technical Assistance will be provided as identified as needed or as requested during monitoring.

Subrecipient Production Monitoring

Subrecipient and home inspection monitoring will be conducted during one- to four-day on-site visits by the Weatherization Field Specialist or Program Manager. All grantee field monitoring will be performed by a certified Quality Control Inspector (QCI). K-WAP will inspect a minimum of ten percent of completed homes, filling out a Home Inspection Monitoring Instrument (see WAP Subrecipient Procedure Manual) for all homes inspected. Monitoring forms will certify that all work met the required standards and will be signed by the QCI. A signed and dated form stating the above will be made part of the permanent client file. In progress units will be monitored as available.

<u>Subrecipient Production Monitoring (continued)</u>

The effectiveness, safety, workmanship, overall appearance, and compliance with field standards will be evaluated during the monitoring visit.

Dwelling units inspected will be selected from a list of reported projects that will allow a comprehensive sample.

Inspection visits may focus on problem areas identified in previous monitoring reports to ensure that problems have been corrected.

Subrecipient Production Monitoring (continued)

Units which demonstrate satisfactory completion of weatherization measures and compliance with the SWS specifications will be identified as "Pass" units; those units in which weatherization measures were completed but could have benefitted by "Best Practices" or other recommendations will be identified as "Pass with Comments" and T&TA or suggestions for the future will be made.

Units on which weatherization measures either were not completed, were completed unsatisfactorily, or not in compliance with the SWS specifications will be identified as "Rework" units.

K-WAP Evaluation System for Findings

- *Findings may result in the requirement of additional training for the subrecipient personnel and/or the recoupment of disallowed costs.
- *Fiscal element that does not comply with internal control standards, Federal or State Statute or Regulation to an extent to cause a concern either due to materiality in monetary volume or risk
- *The health and safety of clients, subrecipient staff, and subrecipient subcontractors, or the integrity of the building structure is threatened by work completed with weatherization funds

Findings (continued)

- *A health or safety problem is created by, exacerbated by, or not corrected by the delivery of K-WAP services
- *The omission of a required measure or technique with major energy savings potential, as determined by REM Design Improvement Analysis or a required procedure that addresses health and safety concerns
- *Poor quality of work that significantly affects the performance of measures or repairs

Findings (continued)

- *Expenditure of K-WAP funds on measures that are not approved under K-WAP or required for health or safety reasons
- *Expenditure of funds on measures that do not yield an acceptable savings-to-investments ratio as determined by REM Design
- *Expenditure of K-WAP funds on measures that were not actually completed
- *Numerous change orders or reworks

Subrecipient Production Monitoring (continued)

If significant deficiencies are discovered, such as health and safety violations, poor quality installation of materials, or major measures missed, the Subrecipient will be required to take appropriate corrective action to resolve the outstanding issues in a timely manner. No additional DOE WAP funds can be charged for "Reworks" on homes that have already been reported to DOE as completed, weatherized units. "Reworks" identified on units that are reported as completed to DOE will be addressed on a case by case basis in accordance with WPN 11-3. Corrective action may require the removal of that unit from submitted reports or the use of non-DOE funds to correct the issue.

Subrecipient Production Monitoring (continued)

Issues not resolved may result in K-WAP's recoupment of funds invested in the "Rework" units.

Agencies receiving a high number of "Reworks" will be monitored more frequently and will have a higher percentage of homes examined until the Grantee can be assured that all deficiencies are resolved. Once procedures are in place to prevent reoccurrences, typical monitoring will resume.

<u>Subrecipient Production Monitoring (continued)</u>

Contractors found to be repeatedly failing to perform adequately may be disqualified from future work if additional worker training fails to correct issues and concerns. Subrecipients will first contact underperforming contractors by telephone to try to resolve concerns. If concerns continue, the Subrecipient will initiate a written request for corrective action. Persistent concerns or deviations from specified requirements may result in withheld payments, contract probation, or contract termination.

Training and Technical Assistance will be provided as identified as needed or as requested during this monitoring visit.

- *Monitoring, in my viewpoint, is to document compliance with program guidelines, to look for missed opportunities, and to identify trends, and to identify T&TA needs and opportunities.
- *A single missed item may simply be a comment on the report provided that it isn't a health and safety concern.
- *Repetitive missed items typically indicate a need for training and technical assistance because a building science concept is misunderstood.
- *Previous monitoring reports are reviewed prior to the site visits. The expectation is that improvement is made.

MONITORING WORK FLOW

COMPLETE THE HOME INSPECTION MONITORING INSTRUMENT

- *Agency job number
- *Funding source or sources
- *Inspection dates Pre, post, and the date reported
- *Blower door numbers Pre, post, & percent reduction
- *Individual measure costs
- *Health & Safety costs and detail
- *Total costs
- *Typical document review (expanded on the next slide)

Typical document review

- *Legalized alien statement
- *Property owner permission client owned or rental
- *Mold statement
- *Renovate Right lead pamphlet declaration
- *Lead Safe Work Practices declaration
- *SHPO documentation
- *Fuel information release form
- *Income calculation and documentation verification

IMPROVEMENT ANALYSIS REVIEW (NEAT/MHEA report)

- *Verify actual cost vs estimated cost of measures
- *Verify life span of measures
- *Verify SIR for installed measures
- *Verify installation of measures and check for measure skipping
 - *Check replacement furnaces for efficiency vs H & S
 - *Verify measure eligibility
 - *Verify cost caps vs waiver if same is exceeded
- *Compare existing combustion appliance condition/equipment to the pre-inspection form information

COMPARE THE WORK ORDER TO THE IMPROVEMENT ANALYSIS

*Check work order measures vs the improvement analysis

*Check health and safety measures

*Take note of additional hand written information on the work order

*Verify that all measures have been post-inspected at the final

REVIEW COMBUSTION FORMS

- *Do health and safety issues exist?
- *Were health & safety issues rectified if existing?
- *Is the information consistent between the pre, post, and the improvement analysis?
- *If HVAC components are replaced, do they meet the sizing report?
- *At post, were all combustion appliances documented as safe?
- *Did worst case draft testing pass and was it properly documented?

WORK ORDER

- *Are measures specified audit approved?
- *Are H&S measures eligible by policy?
- *Are incidentals eligible by policy?
- *Review handwritten notes.
- *Are all measures denoted as final inspected?
- *Did the client sign off at the final inspection?

REVIEW LINE ITEMS ON THE MONITORING INSTRUMENT

PRE INSPECTION

- *Was the thermal boundary properly defined?
- *Were all measurements, calculations, and information correctly identified?
- *Was the blower door test done correctly?
- *Were ASHRAE 62.2 calculation and measurements performed correctly?
- *Were the pre inspection combustible appliance test work forms completed?

AUDIT

- *Was information entered correctly into the audit?
- *Were all entered improvement measures correctly identified?
- *Were all improvement measures identified?
- *Was each measure estimated correctly?
- *Were measures "leap frogged?"

<u>FINAL INSPECTION</u> - (QCI final inspection for DOE)

- *Were post inspection combustible appliance test worksheets completed?
- *Was a worst case draft test completed?
- *Was a post blower door test completed?
- *Were all ASHRAE 62.2 measures tested and verified?
- *Were all measures inspected to ensure they were installed correctly (SWS compliant)?
- *Was the client signature on the final inspection form?

BWR (KS REPORTING DOCUMENT)

- *Was the home reported before the final inspection?
- *Did the home exceed the average cost per dollar amount?
- *Were incidental repairs tied to an efficiency measure?
- *Were all measure assigned to the correct line item?
- *Does the BWR accurately reflect job costs?
- *Does the BWR accurately reflect measures that were completed?

MONITORING

*Was compliance with program guidelines, professional installation of measures, and SWS compliance certified?

*Were installed materials Appendix A compliant?

---- Question and answer session ----

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