

Weatherization Monitoring

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NATIONAL ASSOCIATION FOR STATE COMMUNITY SERVICES PROGRAMS

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Importance of Monitoring

Monitoring helps ensure:

- Weatherization Assistance
 Program (WAP) operates
 according to Federal regulations
 and program guidance.
- Transparency & accountability.
- High quality work.
- Quality Assurance and controls.





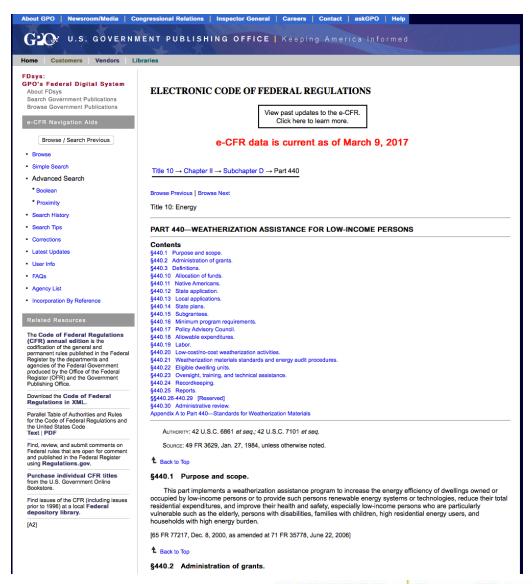
GRANTEES PERFORM MONITORING QUALITY ASSURANCE





Regulations

- 10 CFR 440
- Appendix A





10 CFR 440 Sections

§440.1 Purpose and scope.

§440.2 Administration of grants.

§440.3 Definitions.

§440.10 Allocation of funds.

§440.11 Native Americans.

§440.12 State application.

§440.13 Local applications.

§440.14 State plans.

§440.15 Subgrantees.

§440.16 Minimum program requirements.

§440.17 Policy Advisory Council.

§440.18 Allowable expenditures.

§440.19 Labor.

§440.20 Low-cost/no-cost weatherization activities.

§440.21 Weatherization materials standards and energy audit procedures.

§440.22 Eligible dwelling units.

§440.23 Oversight, training, and technical assistance.

§440.24 Recordkeeping.

§440.25 Reports.



Key Regulation Sections - Monitoring

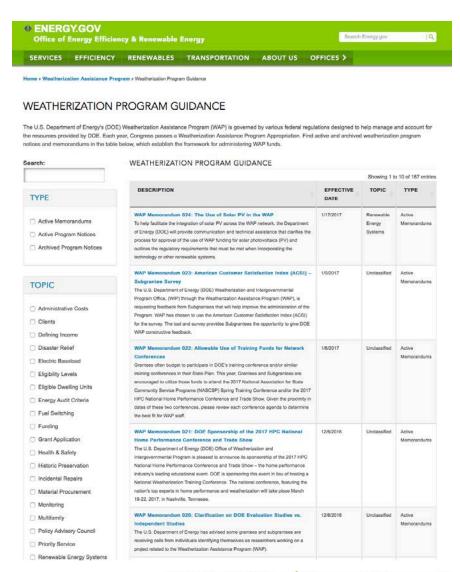
- 10 CFR Part 440.12(b)(6) requires the Grantee to monitor the Subgrantees' program activities.
 - Technical
 - Programmatic & Management
- 2 CFR 200 requires the Grantee to monitor the Subgrantees' fiscal activities.
 - Fiscal monitoring occurs at the Subgrantee offices.



Program Resources

 Weatherization Program Notices (WPN)

 Weatherization Program Memos





Monitoring WPN

- WPN 16-4 is the latest release of the monitoring guidance.
 - Programmatic & Management
 Checklist
 - Subgrantee Checklist
- As a resource, each checklist provides the corresponding regulation section(s) that governs the topic.

SECTION 4: ENERGY AUDITS

11. Subgrantee will be asked to produce the most recent DOE-approved energy audit and/or priority list and demonstrate/describe how it updates and maintains the audit inputs, especially when dealing with atypical housing stock (updating fuel, labor, and material costs, etc.).

How does the Subgrantee's demonstration/description of their audit/priority list (including updates and treatment of atypical housing) align with the information in Section 6, Energy Audits (questions 22-24) of the Grantee P&M checklist.

Source Documentation:

10 CFR 440.14: State Plan

10 CFR 440.19: Labor

10 CFR 440.21 (c), (d), (e): Energy audits

10 CFR 440.23: Oversight, Training & Technical Assistance

10 CFR 440.24: Recordkeeping

WPN 13-5: Revised Energy Audit Approval Procedures and Other Related Audit Issues

Material Review:

Grantee Approved State Plan Audit Input Update Submittals Audit System/Priority List



WHAT DO YOU NEED TO REVIEW DURING MONITORING?



What to Review - Technical

Technical Materials

- Field Guide
- Policies and Procedures Manual
- Energy Audit(s) and/or Priority List
- Audit Input Update Submittals
- QCI unit reports
- Client Files
 - Contractor Invoices
 - Materials Invoices



What to Review - Programmatic

Programmatic Materials

- Copy of the most recent/active Award Agreement
- Copy of the approved State Plan
- Policies and Procedures Manual
- Field Guide
 - Does it align with the SWS?
- Historic Preservation Agreement
- Eligibility/Priority Service



What to Review

Financial Materials

- Contracts
- Contractor Invoices
- Accounting reports



Recommendations

► Bookmark location of following regulations

- ▶10 CFR 440
- ▶2 CFR 200
- ► Grantee Policy & Procedures Manual
- ► Copy of approved State Plan
- ►WPN's & Memorandums
- http://www.waptac.org/

Recommendations

- ► Understand the governing regulations
 - ►To know if applied correctly, must understand what it says or requires
 - ►Stay up to date on WPN's & memorandums
- ► Knowledge of State Plan
 - ► Why is this important?
 - ► How is information from monitoring tied to the State Plan?

What makes the process work?

- ► Commitment at all levels of the WAP
 - ▶DOE's expectations being followed
 - ► Grantee's policies & commitment to enforce them
 - ► Sub-grantee using results for evaluation
 - ► Developing trust that all will do their part

Why Is It Important?



- Congress
- Authorization Presidents budget
- Appropriations
- Work of national partners



Department of Energy

- Funds receivedGrant guidance
- State Plans
- Distribution of funds



- Distribution of Grantees (States, Territories & Tribes)
 - State plans
 - Public Hearings
 - Leveraging other funds
 - Grant Awards



Local Providers (Sub-grantees)

- Client
- Staffing
- Contracting
- Deployment



- Customer service
- Client education
- Quality Control

Why Is It Important?

- ► A new Administration and Congress
 - ► Navigating opportunities and challenges
 - ► Determine and Evaluate the "Friends of Weatherization"
 - ►Increased focus on WAP Strengths
 - ► Jobs, American made materials, small business successes
 - Reauthorization Efforts and Opportunities
 - ►Importance of utilizing resources

What Could Possibly Go Wrong?

- **▶**Scenario
 - ►WAP Manager at a sub-grantee
 - ▶QCI certified
 - ► Performs QCI inspections for neighboring sub-grantee
 - ► Discovered through monitoring paid to perform QCI as contractor while "on the clock" being paid as WAP Manager through same federal grant

DOE Expectations

- ►V.5.3 Final Inspection Master File
 - ►Grantees must ensure that all Sub-grantee final inspections for completions are performed by certified Quality Control Inspectors as outlined in WPN 15-4 and as stated in the DOE approved written Grantee Quality Control Inspection Policy.

DOE Expectations

- ►V.5.3 Final Inspection Master File
 - ► Grantees will provide a copy of relevant policies and procedures that will govern the quality control inspection process in accordance with WPN 15-4 Section 3 and outline disciplinary actions for inadequate inspection practices. This should include a description of how the inspector is related to the work being done on the home (i.e. did they also audit the home or are they an independent third-party?) as well as the percentage of homes that will be included in the Grantee monitoring process.

Policy Example

▶Violation

- ► G. Fraudulent activity or fraudulent charges that are being reimbursed by the Weatherization Assistance Program;
- ► H. Negligent work performance that leaves clients or other workers in imminent danger (Health and Safety-i.e., carbon monoxide allowed to enter the home or gas leak not addressed).

Policy Example

- **▶**Consequences
 - ▶Permanent Debarment.
 - ► A contactor or persons performing work that fall under category (G and H) will fall under the Suspension & Debarment Policy, which could lead to permanent debarment from providing weatherization services funded through the Weatherization Assistance Program.

- Avoiding Conflicts of Interest
 - ▶Inspectors shall not participate in professional activities involving a conflict of interest. A conflict of interest occurs when an inspector is inappropriately motivated by any financial, personal, or professional incentive other than the production of a professional report that clearly, completely, and usefully reflects the conditions observed during the audit.

- Inspectors shall avoid, whenever possible, even the appearance of a conflict of interest and shall disclose all potentially questionable associations and relationships in advance to any stakeholder with a legitimate right to be informed of them.
- ► Inspectors shall neither misrepresent nor misuse their certification.

- ► Inspectors shall not engage in any conduct that is detrimental to the reputation or the best interests of the Quality Control Inspector Certification, the profession, or the industry as a whole.
- ▶ Inspectors shall act professionally at all times and in the best interests of the client and employer.

- **▶**Consequences
 - ► Violation of any article of this Code of Ethics could result in disciplinary actions including the revocation of the inspector's certification.

The Importance Nationally

- ► President Trump's "skinny budget" for 2018
 - ► Focuses funding for the Office of Energy Efficiency and Renewable Energy, the Office of Nuclear Energy, the Office of Electricity Delivery and Energy Reliability, and the Fossil Energy Research and Development program on limited, early-stage applied energy research and development activities where the Federal role is stronger. In addition, the **Budget eliminates the Weatherization Assistance** Program and the State Energy Program to reduce Federal intervention in State-level energy policy and implementation. Collectively, these changes achieve a savings of approximately \$2 billion from the 2017 annualized CR level.

Legislative Objectives

- ► Authorization
 - ► Legislation and statutes
 - ► Are there changes that need to be made?
- ► Appropriations
 - ► Funding/Budget cycle each year
 - ► Continuing resolutions
- ► Regulations
 - ► Made by agency pursuant to legislation
 - ► E.g. 10 CFR 440 or 2 CFR 200

Legislative Activities

► Meetings

- ▶ With key staffers
- ▶ With partner organizations
- ► Connect members of Congress to WAP professionals and clients

►Events

- ▶ Briefings on Capitol Hill or at White House
- ► Field events e.g. demonstrations, Weatherization Day celebrations

► Funding Letters

► Yearly drive for signatures

Recommendations for the Future

- ► Stay the Course
 - ► Utilize funding and resources
 - ► Continue striving for high work quality
 - ▶Be watchful and informed
 - ▶Be ready to showcase what you do
 - ► Recognize the WAP for what it is

Thank you!

▶Questions?