



U.S. DEPARTMENT OF
ENERGY

Energy Efficiency &
Renewable Energy

Weatherization Monitoring

March 27, 2017

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US Department of Energy



NATIONAL ASSOCIATION FOR STATE COMMUNITY SERVICES PROGRAMS

Ray Judy

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

SUBGRANTEES PERFORM
INSPECTIONS



QUALITY CONTROL

Regulations

- 10 CFR 440
- Appendix A

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Related Resources

The Code of Federal Regulations (CFR) annual edition is the codification of the general and permanent rules published in the Federal Register by the departments and agencies of the Federal Government produced by the Office of the Federal Register (OFR) and the Government Publishing Office.

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Title 10 → Chapter II → Subchapter D → Part 440

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Title 10: Energy

PART 440—WEATHERIZATION ASSISTANCE FOR LOW-INCOME PERSONS

Contents

- §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.
- §440.26-440.29 [Reserved]
- §440.30 Administrative review.

Appendix A to Part 440—Standards for Weatherization Materials

Authority: 42 U.S.C. 6861 *et seq.*; 42 U.S.C. 7101 *et seq.*

Source: 49 FR 3629, Jan. 27, 1984, unless otherwise noted.

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§440.1 Purpose and scope.

This part implements a weatherization assistance program to increase the energy efficiency of dwellings owned or occupied by low-income persons or to provide such persons renewable energy systems or technologies, reduce their total residential expenditures, and improve their health and safety, especially low-income persons who are particularly vulnerable such as the elderly, persons with disabilities, families with children, high residential energy users, and households with high energy burden.

[65 FR 77217, Dec. 8, 2000, as amended at 71 FR 35778, June 22, 2006]

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§440.2 Administration of grants.

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.

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§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

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Home » Weatherization Assistance Program » Weatherization Program Guidance

WEATHERIZATION PROGRAM GUIDANCE

The U.S. Department of Energy's (DOE) Weatherization Assistance Program (WAP) is governed by various federal regulations designed to help manage and account for the resources provided by DOE. Each year, Congress passes a Weatherization Assistance Program Appropriation. Find active and archived weatherization program notices and memorandums in the table below, which establish the framework for administering WAP funds.

Search:

TYPE

- ☐ Active Memorandums
- ☐ Active Program Notices
- ☐ Archived Program Notices

TOPIC

- ☐ Administrative Costs
- ☐ Clients
- ☐ Defining Income
- ☐ Disaster Relief
- ☐ Electric Baseload
- ☐ Eligibility Levels
- ☐ Eligible Dwelling Units
- ☐ Energy Audit Criteria
- ☐ Fuel Switching
- ☐ Funding
- ☐ Grant Application
- ☐ Health & Safety
- ☐ Historic Preservation
- ☐ Incidental Repairs
- ☐ Material Procurement
- ☐ Monitoring
- ☐ Multifamily
- ☐ Policy Advisory Council
- ☐ Priority Service
- ☐ Renewable Energy Systems

WEATHERIZATION PROGRAM GUIDANCE

Showing 1 to 10 of 187 entries

DESCRIPTION	EFFECTIVE DATE	TOPIC	TYPE
WAP Memorandum 024: The Use of Solar PV in the WAP To help facilitate the integration of solar PV across the WAP network, the Department of Energy (DOE) will provide communication and technical assistance that clarifies the process for approval of the use of WAP funding for solar photovoltaics (PV) and outlines the regulatory requirements that must be met when incorporating the technology or other renewable systems.	1/17/2017	Renewable Energy Systems	Active Memorandums
WAP Memorandum 023: American Customer Satisfaction Index (ACSI) – Subgrantee Survey The U.S. Department of Energy (DOE) Weatherization and Intergovernmental Program Office, (WIP) through the Weatherization Assistance Program (WAP), is requesting feedback from Subgrantees that will help improve the administration of the Program. WAP has chosen to use the American Customer Satisfaction Index (ACSI) for the survey. The tool and survey provides Subgrantees the opportunity to give DOE WAP constructive feedback.	1/9/2017	Unclassified	Active Memorandums
WAP Memorandum 022: Allowable Use of Training Funds for Network Conferences Grantees often budget to participate in DOE's training conference and/or similar training conferences in their State Plan. This year, Grantees and Subgrantees are encouraged to utilize those funds to attend the 2017 National Association for State Community Service Programs (NASCCSP) Spring Training Conference and/or the 2017 HPC National Home Performance Conference and Trade Show. Given the proximity in dates of these two conferences, please review each conference agenda to determine the best fit for WAP staff.	1/8/2017	Unclassified	Active Memorandums
WAP Memorandum 021: DOE Sponsorship of the 2017 HPC National Home Performance Conference and Trade Show The U.S. Department of Energy (DOE) Office of Weatherization and Intergovernmental Program is pleased to announce its sponsorship of the 2017 HPC National Home Performance Conference and Trade Show – the home performance industry's leading educational event. DOE is sponsoring this event in lieu of hosting a National Weatherization Training Conference. The national conference, featuring the nation's top experts in home performance and weatherization will take place March 19-22, 2017, in Nashville, Tennessee.	12/6/2016	Unclassified	Active Memorandums
WAP Memorandum 020: Clarification on DOE Evaluation Studies vs. Independent Studies The U.S. Department of Energy has advised some grantees and subgrantees are receiving calls from individuals identifying themselves as researchers working on a project related to the Weatherization Assistance Program (WAP).	12/8/2016	Unclassified	Active Memorandums

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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 received
- Grant guidance
- State Plans
- Distribution of funds



Grantees (States, Territories & Tribes)

- State plans
- Public Hearings
- Leveraging other funds
- Grant Awards



Local Providers (Sub-grantees)

- Client recruitment
- Staffing
- Contracting
- Deployment



Low Income Households

- 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 contractor 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.

BPI Code of Ethics

- ▶ **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.

BPI Code of Ethics

- ▶ 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.

BPI Code of Ethics

- ▶ 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.

BPI Code of Ethics

► 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?