Technical Monitoring – Part 1

May, 2021

Learning Objectives

In this session we'll discuss:

- Purpose of Monitoring in general

- Layers of Monitoring

- QA vs. QC

- DOE monitoring of Grantees

    - Preparing for an onsite visit
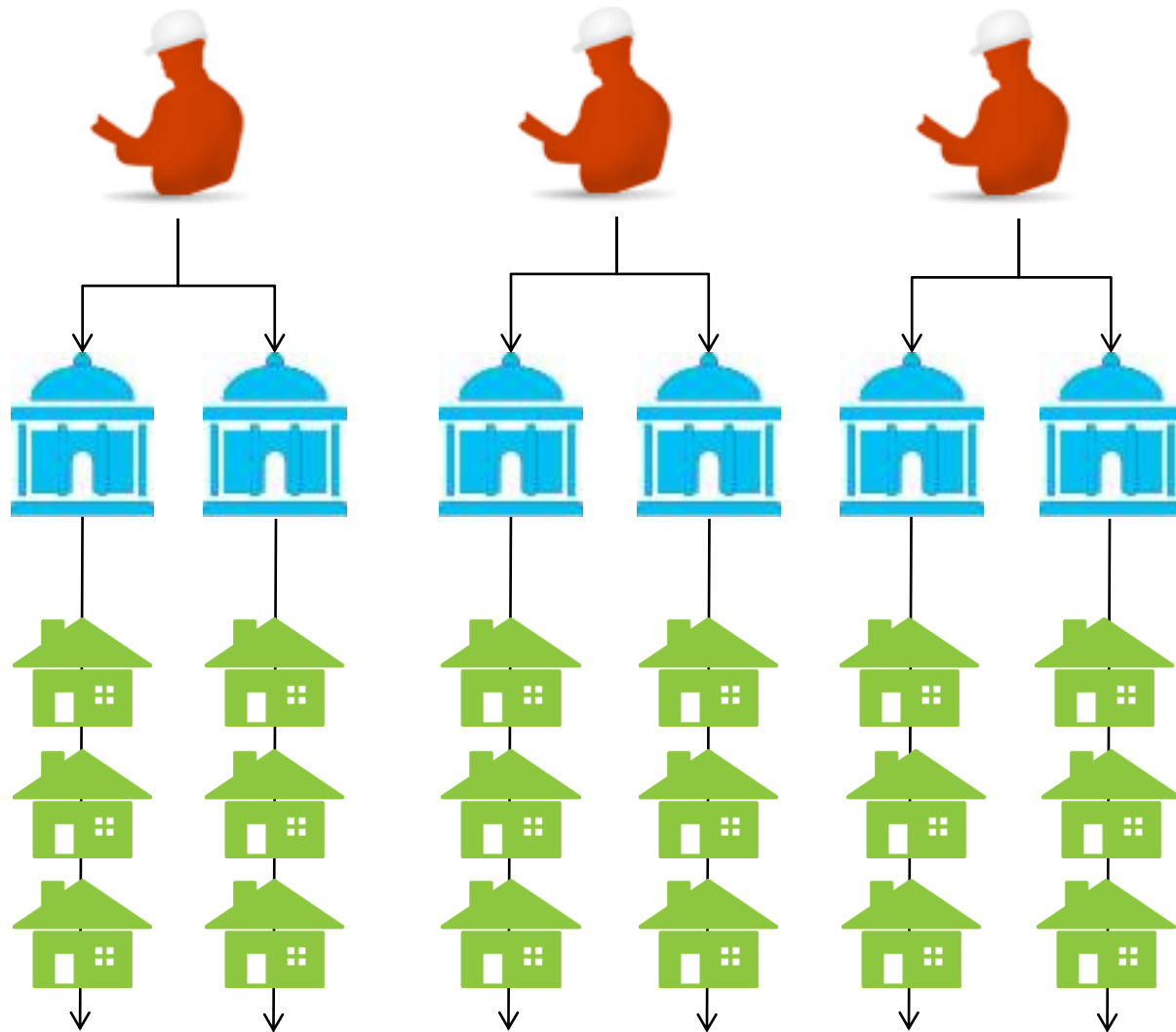
    - During and after the visit

Purpose of Program 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.

Monitoring Layers

Federal staff monitor the WAP Grantees.

WAP Grantees monitor their Subgrantees.

Subgrantees have their Inspectors review the work of their auditors, crews and contractors.

Difference in Monitoring vs. Inspections

GRANTEES PERFORM

MONITORING

QUALITY ASSURANCE

SUBGRANTEES PERFORM

INSPECTIONS

QUALITY CONTROL

Federal Monitoring

10 CFR Part 440.23 – Oversight, Training and Technical Assistance

(a) Requires DOE to monitor and evaluate the operation of projects carried out by Community Action Agencies (CAA).

(b) In addition, DOE shall also carry out periodic evaluations of a program and weatherization projects that are **not** carried out by a CAA and that are receiving financial assistance under this part.

Weatherization Monitoring Guidance and Requirements

Monitoring Guidance WPN 20-4

- Grantees are monitored by DOE Project Officers against current, approved annual plans.

- Federal monitoring frequency:

  - **Onsite**: Goal is one visit per year.

  - **Desktop**: Quarterly.

Quality Work Plan WPN 15-4

- Establishes minimum quality assurance inspections/ monitoring reviews.

Department of Energy
Washington, DC 20585

WEATHERIZATION PROGRAM NOTICE 20-4
ISSUED DATE: January 22, 2020

SUBJECT: WEATHERIZATION ASSISTANCE PROGRAM MONITORING PROCEDURES

INTENDED AUDIENCE: Weatherization Grantee Program Managers, Weatherization Grantee Monitors, Weatherization Subgrantee Program Managers/Coordinators and Weatherization Subgrantee Monitors

PURPOSE: To issue updated monitoring policy and procedures for the Weatherization Assistance Program (WAP or Program).

This Weatherization Program Notice (WPN) describes the revisions to current WAP monitoring procedures and provides additional information and resources for Grantees to strengthen and enhance their weatherization monitoring plans.

SCOPE: The provisions of this WPN apply to all WAP Grantees applying for financial assistance under the Department of Energy's (DOE) WAP. This Notice supersedes WPN 16-4.

LEGAL AUTHORITY: Title IV, Energy Conservation and Production Act, as amended, authorizes the DOE to administer the WAP (42 U.S.C. 6861 *et. seq.*). All grant awards made under this Program shall comply with all applicable law including, but not limited to, the WAP statutory authority (42 U.S.C 6861*et. seq.*), and 10 CFR Parts 440 and 2 CFR Part 200.

The WAP regulation, in 10 CFR 440.23(a) - Oversight, Training and Technical Assistance, prescribes that DOE "*shall monitor and evaluate the operation of projects carried out by [Community Action Agencies] CAA's receiving financial assistance under this part through on-site inspections, or through other means, in order to ensure the effective provision of weatherization assistance for the dwelling units of low-income persons.*" Section 440.23(b) states that "*DOE shall also carry out periodic evaluations of a program and weatherization projects that are not carried out by a CAA and that are receiving financial assistance under this part.*"

BACKGROUND: DOE strives to provide the WAP Network with tools and resources necessary to offer the highest quality of work and services to the low-income families served by the Program. It remains critically important that WAP funds be used cost-effectively and in accordance within existing Program Notices, rules and regulations. **Monitoring ensures the public purpose of the Program**.

First page of the Weatherization Program Guidance 20-4.

Program Monitoring & Risk Assessment

- The Department of Energy monitors a percentage of Weatherization Grantees each year.

- The selection of Grantees for onsite monitoring is determined by completing an annual **Risk Assessment**.

- Weatherization's goal in the annual risk assessment process is to:
    - Remove any subjectivity or bias from the analysis.
    - Have questions that are fair, measurable and objective.

Outcome: Systematic process to identify the level of risk which determines whether monitoring should be done.

Risk Assessment

Weatherization Project Officers review the following areas for each of their assigned Grantees:

- Carryover Funding
- Grantee Staff Longevity & Experience
- Network Production
- Last Onsite Monitoring Visit from DOE
- Unresolved Monitoring Findings/Concerns
- Reporting History (are QPR, FFR reports submitted on time?)
- A-133 Audit Review
- Management Decision Letters
- Energy Audit Compliance

Risk Assessment

Based on the risk assessment results, the tool identifies the level of risk which determines whether monitoring should be done.

| AVERAGE SCORE	RECOMMENDATION
3.0 or higher	Monitoring recommended
2.0 – 3.0	Monitoring may be necessary
Below 2.0	Monitoring not necessary at this time

Types of Monitoring

QUARTERLY
DESKTOP MONITORING

ONSITE MONITORING

AD HOC MONITORING

Federal Monitoring Layers

CONTINUAL MONITORING (ONSITE AND DESK)

ONSITE MONITORING

GRANTEE RISK ASSESSMENT

OCTOBER — JANUARY — APRIL — JULY

Quarterly Desktop Monitoring

Quarterly Desktop Monitoring

Quarterly Desktop Monitoring

Quarterly Desktop Monitoring

Issues Identified (IG report, fraud, waste or abuse, etc.)

AD-HOC MONITORING
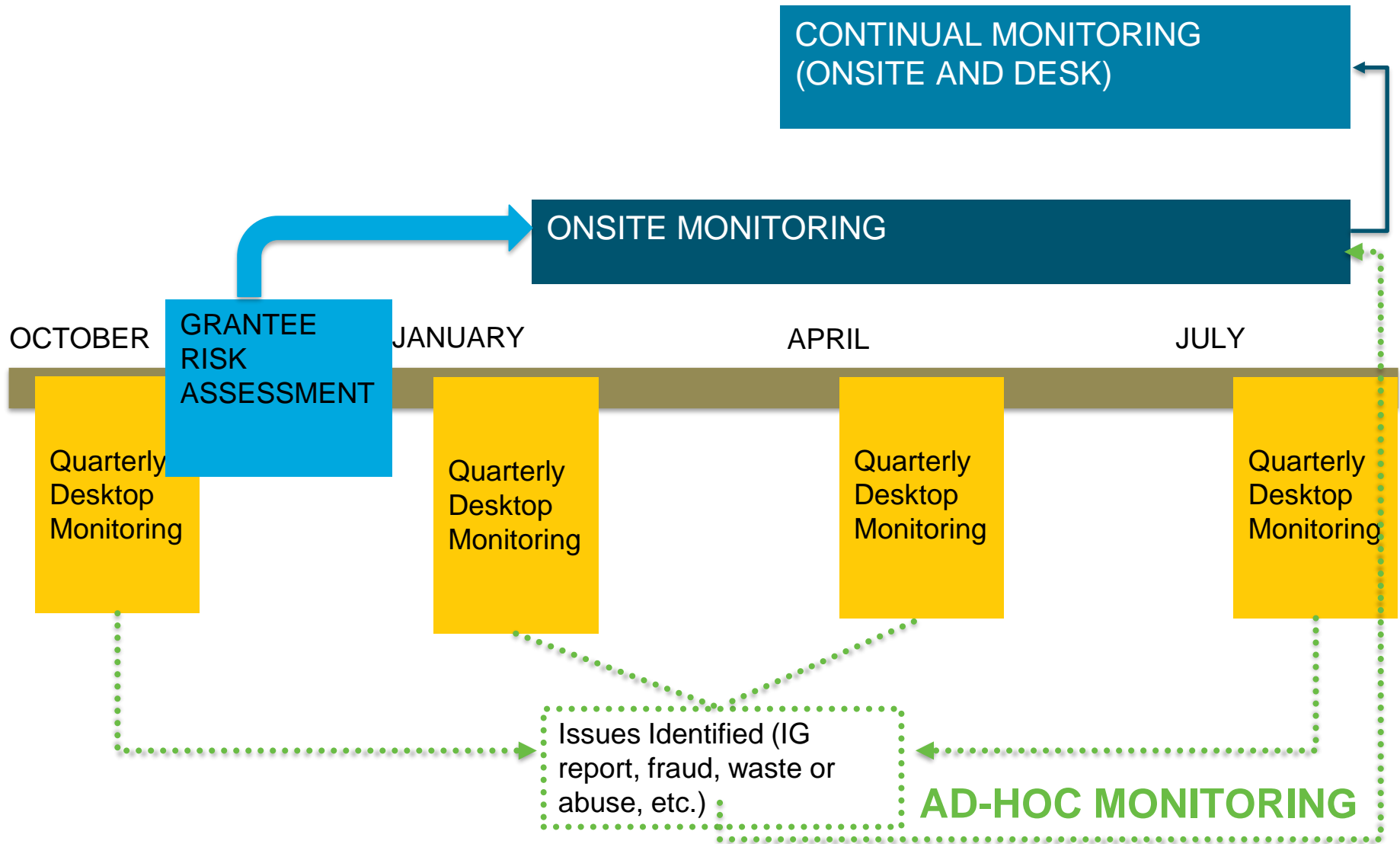
Quarterly Desktop Monitoring

- Driven by Grantee Financial and Production reports submitted on the 30th of the month following the end of the quarter.

- Required every quarter.

- Quarterly desktop monitoring completed in PAGE by Project Officer.

- Verifies the Grantee is in compliance with program requirements or identifies needed corrective actions to become compliant.

  – If deficiencies are identified, **monitoring assessments** can be issued.

Onsite Monitoring

- Once every 1-3 years.

- Based on Risk Assessment results.

- Includes visiting selected Subgrantee offices and completed and in-process unit(s) (*if applicable*).

Ad Hoc Monitoring

- Ongoing desktop or onsite monitoring driven by Grantee performance.

- Monitoring Assessments can be issued which may require corrective action plans.

- Monitoring Grantee or their Subgrantee Network as a result of:

  - IG report

  - GAO Report

  - "At Risk" activities (fraud, waste or abuse)

Selecting Dates for Visit

Your Project Officer may ask you to prepare materials and other items for a specific period of performance within the current grant cycle.

For example, PY 2021 First Quarter (January through March 2021).

Development of Monitoring Visit Agenda

Once the visit dates are set, the next step is to create a visit agenda and detail each day with your Weatherization Project Officer.

- Entrance Conference

- Introductions

- Grantee Review

- Subgrantee Review and # of units to visit

- Exit Briefing

Preparation | Selection of Subgrantees

Questions and Criteria to Consider:

- How many days do you have scheduled for Subgrantee visits?

- When was the Subgrantee last monitored by the Grantee?

- Did the Grantee identify the Subgrantee as at risk? Is there any evidence of fraud, waste or abuse?

- What is the Subgrantee's production history?

- What is the Subgrantee's territory, size and budget?

Preparation | Selection of Units

Single Family Homes

Small Multifamily
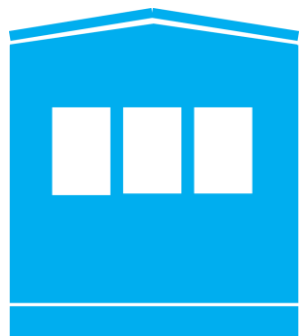
Mobile/Manufactured Homes
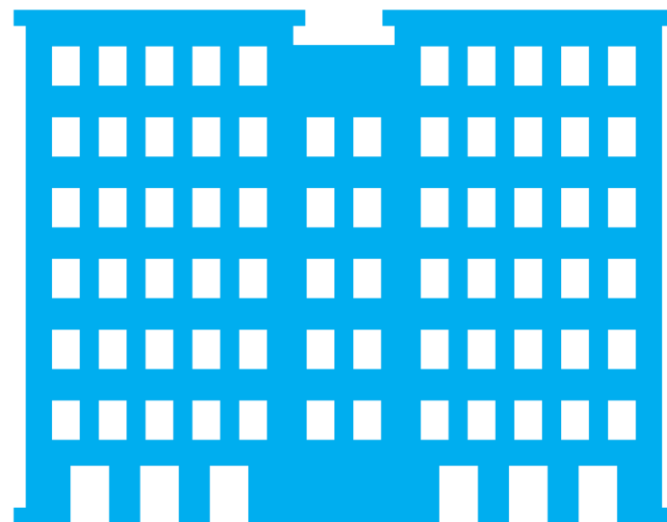
Large Multifamily

Preparation | Documentation

- Supporting documentation to correspond to the Grantee and Subgrantee checklists should be ready and available in the office for P&M review.

- Can have materials ready in binder, etc.

- Monitoring checklists are available on EERE website under Technical & Management Resources > Monitoring.

WAP Website & Resources

https://www.energy.gov/node/4389111

Preparation | Materials & Documentation

Request for materials via email from PAGE.

Please remember to make sure you redact any personal information (SSN, full names, etc.)

GRANTEE PROGRAM MATERIALS
- Grantee and Subgrantee most recent amended agreement
- Completed Subgrantee Monitoring Reports
- Monitoring Tool/Instrument
- Procedural Manuals for Program Implementation (with technical reports)
- Most recent Grantee support contract/training entities or other contracted activities
- Procurement documentation related to the agreements
- Inventory Tracking and Records

SUBGRANTEE PROGRAM MATERIALS
- Current Grantee State Plan
- Amended Award with the Grantee (most recent version)
- Grantee's Weatherization Policies and Procedures Manual
- Copies of files of homes to be visited
- Inventory Tracking Materials (if applicable)
- Subcontractor Contracts
- Procurement documents to verify competition
- Most recent documentation of grantee monitoring visit
- Costs and Fixed Price Lists [Materials, Services (Audits, Inspections, etc.)]

Preparing Your Subgrantees for Visit

For the Subgrantees selected for site visits:

- ✓ Ensure they receive a copy of the DOE Subgrantee monitoring checklist.
- ✓ Their key staff should participate in the visit and be prepared.
  - Financial - Accounting
  - Technical – QCI Monitors, Crew Leaders
  - Programmatic – Intake staff
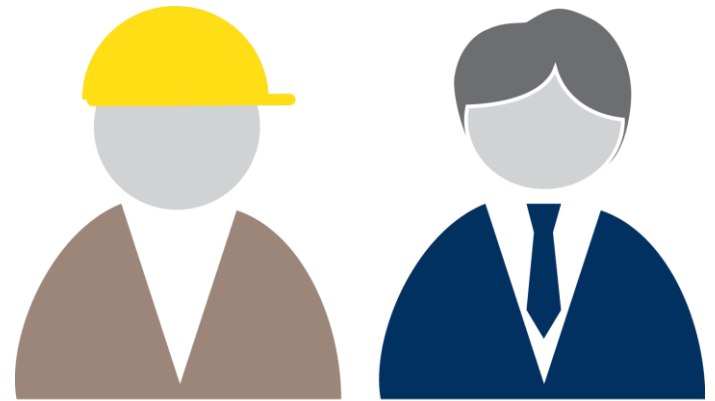
Preparing Your Subgrantees for Visit

Share with your Subgrantees what the expectations are for a DOE onsite monitoring visit.

- There will be a large group (DOE, contractors, state reps, etc.).
- DOE will "shadow" state monitors to see what they do when they go out to complete their monitoring.
- Technical Assistance will be provided as needed or when opportunities are identified.

Preparation | Travel Logistics

Preparation | Equipment

Questions?

Onsite | Programmatic/Mgmt. Review

- State Plan Compliance
  - Monitoring Schedule
    - Is the Grantee on schedule to complete required monitoring based on their approved plan?
  - Training Documents
    - Copies of certifications to demonstrate they are current
    - Tier 2 training results
- Client File Review
- Procurement Policies
- Manuals Review
- Inventory Management (Grantee level)
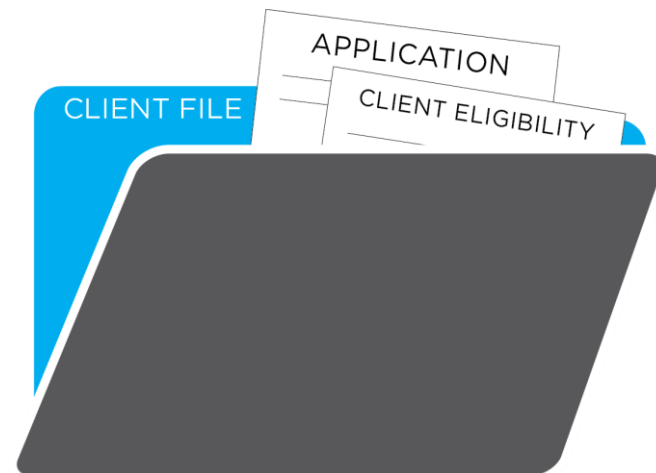
Onsite | Client File Checklist

1) Subgrantee Signoff Sheet

2) Eligibility Materials

- Income eligibility documentation
- Owner/Rental documentation
- Deferral
- State Historical Preservation (SHPO) materials

3) Client Correspondence/Signoffs

- Notification to the client on approval (or denial) of service
- Client Complaints/Resolutions
- Client Signoffs
- QCI Form

Onsite | Client File Checklist

4) Work Documentation

- Assessment/Energy Audit
- Housing/Building characteristics
- Work Order
- Work Summary
- Testing Documentation
- Subgrantee's QCI Final Inspection Form
- Grantee's Monitoring Assessment
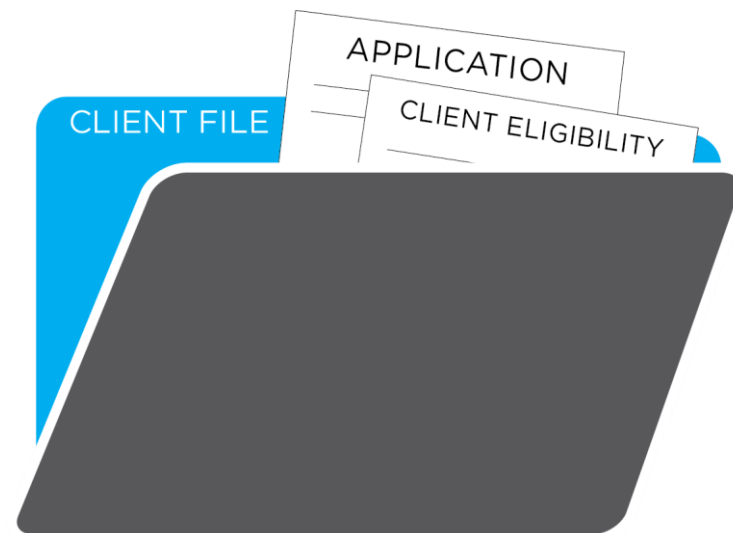
Onsite | Client File Checklist

5) Supporting Documentation for the Work Performed
- Permits
- Lead Paint Notification
- Lead Safe Weatherization (LSW) Documentation
- Mold/Moisture Assessment
- Other Hazard Notifications
- Diagnostics Testing Results
- ASHRAE 62.2 results

6) Invoices

7) Grantee Specific Requirements

Onsite | Equipment & Inventory

- Check onsite inventory including equipment and materials.

- Review of tracking records.

- At the Subgrantee office, review equipment and inventory records to make sure things match up.

- Make sure you follow 2 CFR 313(D)(1).

  - Categories, costs, dollar values.

  - Makes closeout easier.

Onsite | Training Certifications

Assure there is sufficient staff including credentialed weatherization classifications.

- Are they tracking training classes?

- Do they have a filing system for tracking certifications?

Onsite | Technical

- Will review the audit (data collection forms – combustion safety, etc.), work order and work

- Review the unit materials and client file before the visit.

- State/Local staff should be prepared to do combustion safety testing and diagnostics tests.

Onsite Monitoring | Exit Briefing

- Reserve a conference room for the exit briefing.
  - Required participants:
    - State monitors
    - Program Manager
    - Fiscal Manager
    - Training Staff
  - DOE may request certain Grantee staff to attend the briefing.

Federal Monitoring Reports

- A written monitoring report is due to the Grantee within **30 days** of the site visit and MUST include:

  – Observations.

  – Recommendations.

  – Concerns.

  – Findings.

- Monitoring reports should also include:

  – Best practices.

  – Accolades.

  – Training and Technical Assistance (T&TA) needs.

Onsite Monitoring Reports

- During this period, the Project Officers can remind the Grantee to **submit materials needed for documentation and/or verification** if not provided during the onsite visit.

  - If the materials are not submitted within the requested timeframe, then each deficiency will be identified in the final monitoring report.

Onsite Monitoring Report | Grantee Response

- A response back to DOE is due within **30 days after receipt** of DOE issued monitoring report.

- Grantee must provide **specific details and processes** within their Corrective Action Plan on how each deficiency (or assessment or action item) identified in DOE monitoring report will be resolved.

Questions?

derek.schroeder@ee.doe.gov