



Weatherization Assistance Program

Monitoring Protocol

May 2013



*Weatherization
Works*

Table of Contents

<u>Statement of Purpose/Guiding Principles</u>	3
<u>Levels of Agency Performance and Monitoring Frequency</u>	4
<u>Required Corrective Action</u>	6
<u>Desk Monitoring/Spot Checks/Fiscal Review</u>	7
<u>Technical Monitoring Reference Materials</u>	8
<u>Technical Monitoring Tools and Equipment</u>	10
<u>Technical Monitoring Procedures</u>	11
<u>Definitions and Appeals to Monitoring Process</u>	12
<u>Required File Documentation</u>	13
<u>On-Site Monitoring Forms:</u>	14
<ul style="list-style-type: none">• Pre-Monitoring Questionnaire• Agency On-Site Assessment Report• Interview with Weatherization Coordinator• On-Site Technical Monitoring Tool• File Review Worksheet• Monitoring Report• On-Site Combustion Safety Monitoring Tool• GEFA WAP Combustion Safety Test Sheet	

Purpose Statement

The purpose of Program Monitoring is to provide compliance review, technical assistance, and information sharing to service providers to ensure that:

- Quality, comprehensive weatherization services are provided at a consistently high level of effectiveness throughout the state.
- Program accountability and efficiencies are in effect and verifiable.
- Innovative technological advances are promoted.

Guiding Principles

I. Planning

- Program monitoring is organized, systematic, regular and scheduled in advance for mutual convenience.
- Monitoring plans are defined with clear expectations, scope and process.
- Individualized monitoring for every agency to reflect historical findings, observations and needs.
- Technical protocol, standards and tools are kept current.

II. Constructive process

- Monitoring and technical assistance is conducted in a professional manner with consistency, fairness, respect and timeliness.
- The Program Monitor fosters positive, open and constructive working relationships.
- Monitoring reports are consistent with and are based on adopted program policies, procedures, standards and protocols.
- Inspections are performed thoroughly and objectively.
- Program Monitor promotes improvement by providing technical assistance and resources.
- Monitoring reinforces weatherization best practices to help ensure prudent decisions are made and positive results are achieved for the clients served.

III. Learning and experiences

- The Program Monitor is knowledgeable and skilled to promote new and enhanced methods of service delivery and business practices.
- The Program Monitor serves as a conduit for the delivery of innovative and cutting edge technologies.
- Monitoring serves as a two-way educational experience that promotes interaction, feedback and state and local program improvements.
- The Program Monitor acknowledges and shares successes, innovations, best practices and experiences.
- Program monitoring, technical assistance and required follow-ups to findings are structured to protect program integrity and to sustain program support.

Levels of Agency Performance and Monitoring Frequency

High Performance

By way of monitoring review, an agency has demonstrated performance standards that meet and exceed all observed areas in the following:

Program operations:

- No more than one (1) Health and Safety finding as identified in previous monitoring report.
- No more than one (1) procedure findings related to program rules, and policies and procedures.

Fiscal:

- No annual program specific audit findings.
- Monthly reports are always in on time and correct. (Per Georgia Weatherization Program Notice GA 12-04)

Technical:

- Provides comprehensive service utilizing the latest weatherization techniques, in a cost-effective manner in accordance with Georgia Weatherization Assistance Program guidelines and standards.

A "High Performance" agency will be monitored at least once every 12 months.

Standard Performance

Typically, the frequency of monitoring will be one or two visits per year. The need for a second visit will be determined by GEFA, based on such factors as past monitoring results and agency's program funding and production level and the completeness of the monitoring within the time available. GEFA expects every agency to meet these standards of performance:

1. Well-established systems for program administration and operations, with no more than one finding in the following areas:
 - Compliance with major program requirements, such as Combustion Safety Testing and lead-based paint procedures, cost allocation plan/indirect rate and required contractor information.
 - No more than one program specific finding in the annual audit.
 - Staff well trained in performance and specific job duties.
 - Complete and organized files.
2. Evidence of prudent decision making as to use of program resources
 - Complete scope of work.
 - NEAT/MHEA set-ups current.
 - Staff proficient using NEAT/MHEA.
 - Evidence NEAT/MHEA is used.

Standard Performance (Continued)

3. Staff and contractors have demonstrated proficiency in technical applications including diagnostics.
4. Agency has a maximum of two (2) and the severity of procedural findings (as related to program rules and policies and procedures) and health and safety finding from previous monitoring report.
5. Agency complies with safety rules.
6. The agency maintains a professional working relationship with GEFA.
7. Past corrections made and reported in a timely manner.
8. None of the elements identified in the At-Risk category are present.

At-Risk Performance

At-Risk agencies may be identified as a result of a variety of factors that may include:

1. The agency's probation.
2. There is evidence of significant administrative or program sub-standard performance. For example: repetitive pattern of findings, failure to have copies of permits, certifications or licenses on file.
3. The agency is not in compliance with program policies, procedures and specifications.
4. The agency has repeated health and safety findings.
5. Agency staff members/crew have deficient technical skills
6. There has been a continuous change in key staff.
7. There has been a continuous change in key weatherization contractors.
8. The agency has program specific audit findings.
9. The agency files are incomplete or disorganized.
10. The agency staff is unresponsive to GEFA requests and deadlines. For example: the agency consistently fails to provide monthly reports and contract closeouts in a timely manner. (Per Georgia Weatherization Program Notice GA 12-04)
11. Agency production is low relative to funding.

At-Risk Performance (Continued)

12. Other programs (CSBG, LIHEAP, Headstart, etc.) have indicated problems with or concerns about the agency.

At-Risk agencies will be monitored no less than twice annually. Other factors in the frequency of monitoring visits may be based upon the requirements of specific funding sources.

The occurrence of a substantial number of, or repeated, Required Corrective Actions may result in a decision by the Weatherization Program Manager to give a sub-grantee At-Risk status. (Please see "Required Corrective Actions" section for explanation). If a sub-grantee is placed on At-Risk status, special conditions will likely be placed upon the sub-grantee's financial assistance award until the sub-grantee complies with the Georgia Weatherization Assistance Program guidelines and standards.

Required Corrective Action

1. Any of the following circumstances generally result in a Required Corrective Action being issued.
 - The health and safety of clients, sub-grantee staff or subcontractors, or the integrity of the building structure is threatened by work completed with weatherization funds.
 - A health and safety problem is created by, exacerbated by or not corrected by the delivery of weatherization services.
 - The omission of a required measure or technique with major energy savings potential, as determined by NEAT/MHEA or the Priority List or the omission of a required procedure that addresses health and safety concerns.
 - Poor quality work that significantly affects the performance of measures or repairs.
 - Expenditures of weatherization funds on measures that are not approved under the weatherization Standards or not required for health or safety reasons.
 - Major expenditures of funds on measures that do not yield an acceptable savings-to-investment ratio.
2. A Monitoring Report that contains Required Corrective Action may result in:
 - Disallowed costs.
 - An increased inspection/monitoring rate.
 - The requirements of additional training for the sub-grantee personnel.
 - Recommendations for At-Risk Status for the sub-grantee.
3. Continued findings of this type may result in termination of GEFA Weatherization Assistance Program Financial Assistance Award to the sub-grantee.

Desk Monitoring Procedures

A monthly Desk Review for each sub-grantee will be performed. Budget category expenditures and completion rates will be compared to planned rates (*as outlined in DOE grant application request*). Minimum and maximum cost averages for total dwelling, Regular Weatherization and Health and Safety expenditures will be monitored for compliance with WAP guidelines and contract limitations. Materials, labor, and program support cost averages will be monitored to ensure they are maintained at acceptable program levels. Additionally, GEFA weatherization staff will review invoices for timeliness of submission and compliance with Weatherization Program Policy.

Spot Checks

In an effort to validate compliance, GEFA staff will perform impromptu checks of sub-grantee weatherization programs to ensure a continually high performance level on the part of weatherization staff. During these visits, client files and onsite reviews will be conducted to capture the organization's day to day activities.

Administrative/Fiscal Monitoring

Another form of monitoring which a program could potentially undergo is an Administrative/Fiscal Review which emanates from the GEFA Fiscal Team. This review is primarily concerned with the contractual, administrative and accounting aspects of the program operations and does not include a field review. GEFA Fiscal staff schedules these review independently based on their own procedures, and while some areas will overlap, this form of monitoring is not the same as a monitoring visit based largely on field work evaluation.

The following areas will be the primary focus of the review:

- The cost or purchase and delivery of weatherization materials (10 CFR section 440.18(2)(1). Funds may only be expended on weatherization materials in Appendix A of 10 CFR part 440 or as approved by DOE.
- Labor costs in accordance with CFR section 440.19.
- Purchase of annual lease of tools, equipment and/or vehicles, except that any purchase of vehicles shall be referred to DOE in every instance (10 CFR section 440.18(c)(6)).
- The costs of incidental repairs to make the installation of weatherization materials effective (10 CFR section 440.18(c)(9)).
- The costs of liability insurance for weatherization projects for personal injury and property damage (10 CFR section 440.18(c)(10))
- The cost of carrying out low cost/no cost weatherization assistance (10 CFR section 440.20).
- The cost of WAP financial audits in accordance with 10 CFR section 440.23.
- Administrative costs (10 CFR section 440.18(c)(13)).
- The costs of eliminating health hazards necessary to ensure the safe installation of weatherization materials (10 CFR section 440.18(c)(15)).

Technical Monitoring Reference Material

1. The Georgia/Southeast Weatherization Field Guide is a resource guide to Best Practices for improving the comfort, safety, and efficiency of existing homes. Program Guidance takes precedence over the Weatherization Field Guide Book.
2. Policies and procedures adopted for the Weatherization Assistance Program define specific expectations for program implementation and administration.
3. Technical procedures adopted for the weatherization program include:
 - The Blower Door and Air Sealing Procedures, which are used to determine a baseline goal for directing air-sealing work of the building envelope.
 - The Duct Pressure Test Procedures are the standards by which to measure the effectiveness of the HVAC system. The pre- and post weatherization test information is required to be collected and recorded in each client file.
 - The Combustion Safety Test Procedures: establish worst-case depressurization, test spillage, test flue draft, test carbon monoxide in undiluted flue gases, test ambient levels of CO, perform a thorough visual inspection and check on combustion air. This procedure also contains safety thresholds. This test must be performed and recorded at the initial assessment/audit, during the weatherization process if the building envelope/pressure boundary is affected (by air sealing, installation of exhaust fans, exhaust fans vented properly, installation of HVAC equipment, etc.) The Combustion Safety Test Sheet is to be completed on all homes that contain combustion appliances and must be maintained in the client file.
4. Determinations of which measures are to be installed are based upon the National Energy Audit Tool (NEAT) or the Mobile Home Energy Audit (MHEA) and the Priority List. Agencies are responsible for keeping values for installed measure costs and fuel costs current in NEAT/MHEA.
5. Local agencies have the discretion in the procurement of materials and subcontractors. However, all supplies, equipment, materials and services are procured in accordance with OMB Circular A122 and 10 CFR 600.236.
6. The health and safety of the clients, sub-grantee staff, subcontractors and the integrity of the building structure must not be compromised by any work completed with weatherization funds.
7. The sub-grantee Weatherization Director/Coordinator has overall responsibility for the proper implementation of the procedures detailed in the Weatherization Standards.
8. All weatherization installations, both repairs and conservation measures, must comply with applicable building codes and regulations.
9. Sub-grantees are responsible for the quality of all repair and energy conservation work.

Technical Monitoring Reference Material (Continued)

10. Weatherization work is not to proceed until problems beyond the scope of the program, affecting either the integrity of installed weatherization measures or the health and safety of the client or crew/contractor, are remedied with non-weatherization funds.
11. Health and Safety related repairs and allowable repairs that are associated with eligible weatherization measures within the scope of weatherization services include the following:
 - HVAC system replacements.
 - Materials to reduce excessive carbon monoxide to acceptable levels or below.
 - Heat exchanger replacements or repairs.
 - Burner replacement or repairs.
 - Combustion venting system repair or replacement.
 - Repair of gas leaks.
 - Chimney cleaning and lining.
 - Domestic hot water tank replacements.
 - Encapsulation or removal of asbestos by an AHERA asbestos control professional. Small covered surfaces and on case by case basis only.
 - Remediation of conditions that may lead to or promote biological concerns and unsanitary conditions.
 - Proper venting of combustion gases. Including gas dryers.
 - Minor electrical repair where health and safety of occupant is at-risk. Upgrades and repairs are allowed when necessary to perform specific weatherization measures.
 - Mechanical Ventilation per ASHRAE 62.2-2010. Existing fans and blower systems should be updated if not adequate.
 - Minor plumbing repair.
 - Structural repairs (include roofing, siding, ceiling, floor, foundation, and mobile home belly repairs) that are necessary for the installation of energy conservation measures.
 - Vapor barrier installation.
 - Drainage repairs or modifications.
 - Electric clothes dryer venting.
 - Fire Hazards, when necessary to safety perform weatherization.
 - Minor repairs for injury prevention of occupants and weatherization workers, only necessary to effectively weatherize the home. Such as repairing stairs and replacing handrails. Otherwise not allowed.
 - Lead testing/working in accordance with EPA's Lead; Renovation, Repair and Painting Program (RRP). Job site set up and cleaning verification is required by a Certified Renovator.
 - Limited water damage repairs by weatherization workers and correction of moisture and mold creating conditions when necessary in order to weatherize the home and ensure long term stability and durability of the measures. Severe mold and moisture issues cannot be addressed and deferral required.

Technical Monitoring Reference Material (Continued)

- Pest removal, where infestation prevents weatherization. Infestations of pests may be cause for deferral where it cannot be reasonably removed or poses health and safety concerns for workers.
- Screening of windows and points of access to prevent intrusion of pests.
- Installation of smoke and carbon monoxide detectors where not present or are inoperable. Replacement of operable smoke and carbon monoxide alarms are not allowed.
- Removal of unvented space heaters.
- Window and Door replacement. Case by case with GEFA approval only.

(Reference Georgia Weatherization Program Notice GA 12-01 for complete listing.)

12. When repairs beyond the scope of weatherization are not associated with weatherization measure or cannot be justified with a savings-to-investment ratio (SIR) greater than 1.0, the client or homeowner should be notified and referred to alternative resources (home rehabilitation programs, landlords, etc). This occurrence should be documented in the client file.

Technical Monitoring Tools and Equipment

The following monitoring tools and equipment will be used by GEFA to help determine satisfactory work performance:

1. Blower-door tests on a sample of completed jobs to verify the extent of air sealing work.
2. A combustion analyzer/monoxor and manometer on a sample of completed jobs that have combustion appliances to verify compliance with combustion safety test procedures.
3. A digital hand-held manometer on a sample of completed jobs to verify air sealing and duct sealing work.
4. An infrared camera on a sample of completed jobs to verify uniform insulation coverage in closed cavities and inaccessible areas, as well as adequate air sealing work.
5. Digital cameras to take photos of homes inspected and to record extraordinary circumstances or work performance.
6. Pounds per square inch (psi) gauge to test pressure of insulating machines used for sidewall insulation to ensure compliance with GEFA standards.
7. Fan flow pan (along with a manometer) to test pressure/flow of mechanical fans.
8. Pressure pan to test effectiveness of duct sealing work.

Technical Monitoring Procedures

Georgia Environmental Finance Authority (GEFA) has the responsibility for on-site monitoring of all Weatherization Assistance Program sub-grantee agencies.

The weatherization staff's monitoring activities include:

- Inspecting a sample of the dwellings completed by the service provider for each funding source (Regular DOE, DHS-HHS and Georgia Power Company).
- Reviewing client files of dwellings inspected.
- Reviewing program operations to ensure proper administration of allocated funds.
- Evaluating service providers for achieving performance standards based on criteria set forth by GEFA.
- Determining training and technical assistance needs.

The GEFA representative will make available to the local agency a Pre-Monitoring Questionnaire prior to each visit.

Phase I:

- GEFA representative will notify the local agency of upcoming monitoring visit and make available all the necessary forms for completion.
- The local agency will supply the GEFA representative a list of completed projects for the period to be monitored.
- The local agency will complete and return the Pre-Monitoring Questionnaire by pre-determined date.

Phase II:

- The GEFA representative will randomly select the units to be inspected.
- The GEFA representative will randomly select on-site files to be reviewed.

Phase III:

On-site monitoring will attempt to focus on inspections, since desk monitoring will try to satisfy most administrative review, including financial examination. A key component of on-site monitoring will be to provide timely training and technical assistance during the course of on-site monitoring.

Combustion Safety Monitoring will be performed on-site. Homes that are completed or in-progress will be monitored. Workers, assessors and inspectors and all combustion safety related work will be specifically looked at for program adherence to all combustion safety related guidance, guidelines and standards.

Diagnostic testing is performed, including blower-door tests, combustion safety tests, and pressure differential tests. The test results are compared with those noted in the client file.

Client interviews will be performed to assess worker behavior and workmanship and client satisfaction.

Inspection of completed houses, with the local agency auditor/inspector, provides an opportunity to provide on-site technical assistance. Various installation techniques, quality control issues, or test procedures may be discussed during the course of performing the inspection.

The set-up values of the NEAT/MHEA are checked to ensure they are current and accurate, that agency staff is proficient in the use of the NEAT/MHEA and that it is used as directed by GEFA.

Exemplary practices, successful approaches or creative ideas in the operation of the local program will be identified and noted.

Crew Health and Safety procedures will be checked for compliance with the GEFA Health and Safety Plan as contained in the DOE State Plan, and OSHA standards.

An exit interview with the agency's Executive Director, Weatherization Director/Coordinator and other appropriate staff will be held at the conclusion of the monitoring visit to present and discuss preliminary findings, observations and recommendations.

A final written monitoring report to the local agency will be issued within 30 days of any completed monitoring visit. The report will contain a description of the monitor's findings, observations and recommendations for corrective action. The agency will submit a written response within 30 days of the receipt of the monitoring report, providing assurance that identified problems are resolved in a timely manner and documented.

Definitions and Appeals to Monitoring Process

For purpose of consistency, the following definitions will be used during monitoring visits and subsequent reports:

Finding: There are two types used in the monitoring reports:

Major finding: Noncompliance issues that are of significant concern. Such as: health and safety, eligibility, potential liability, misuse of funds, consistently failing to follow program guidance, consistently failing to follow program guidelines and standards or specifications.

Minor finding: Noncompliance issues that are of secondary concern, such as small file omissions (no date on form), procedural items that can be quickly or easily corrected, or a finding in work quality that is easily correctable and does not significantly impact the overall results of work

performed (for example, failure to install pipe insulation on hot and cold water line of the domestic hot water tank).

Observation: Observations are to assist with compliance of program requirements or to enhance or improve service or to share best practices. These are significantly less serious and may be communicated verbally to the agency during the course of monitoring (on-site technical assistance) or the exit interview.

Appeals of Monitoring Reports

A sub-grantee representative may appeal the findings of the monitoring report to the State's Weatherization Program Manager. This appeal should be sent in writing within thirty working days of receipt of the inspection report.

A sub-grantee who does not agree with the initial outcome of the monitoring report appeal may submit a subsequent appeal to the Executive Director of Georgia Environmental Finance Authority.

Required File Documentation

All files presented to the GEFA field monitor for review must include the following documentation:

- Weatherization Application completed and signed by the applicant or designee.
- Copies of documentation for income or categorical eligibility. (Documentation of client eligibility must be conducted by the sub-grantee prior to an energy audit and the weatherization of any dwelling unit. Multi-Family units may not be weatherized until documentation is obtained for all eligible tenants.)
- Client Authorization Form.
- Tenant Agreement (Authorization Form).
- Owner Agreement (Authorization Form).
- LEAD and MOLD pamphlet and signature sheet.
- National Energy Audit Tool or Mobile Home Energy Audit, if applicable.
- Documentation of notification to owners and clients.
- Documentation of the initial field assessment or audit. Including the auditor's name and date of the assessment or audit.
- Final Inspection sheet, signed and dated upon completion by the final inspector.
- Documentation of prior approval waivers.
- Refrigerator Replacement form, if applicable.
- Required documentation for the EPA Lead RRP Rule, if applicable.
- Completed GEFA WAP Combustion Safety Test Sheet. Pre-Weatherization testing. In-Progress testing, if applicable. Post-Weatherization testing. Person performing the testing must initial and date. Executive Director or Weatherization Director or Weatherization Coordinator must sign off on Combustion Safety Test Sheet, certifying it was filled in and performed in accordance with all Georgia Weatherization Assistance Program guidelines and standards.
- Accurate record of all materials installed.

- Invoices for completed WAP work. Including all materials purchased and any Sub-contracted materials and labor.
- Copies of bids and bid summaries for sub-contracted work.
- Change orders.
- Before and After Weatherization photo documentation.
- ASHRAE 62.2-2010 Ventilation Rate Calculator work sheet.
- Justification for Heating, Ventilation, Air Conditioning and Domestic Hot Water tank replacements.
- Sizing calculations for HVAC replacements. NEAT, Manual J or other industry approved method.
- GEFA Georgia Weatherization Assistance Program Assessment Form.

On-Site Monitoring Forms