

Georgia Environmental Facilities Authority

Weatherization Assistance Program Monitoring Protocol & Levels of Agency Performance

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*Weatherization
Works*

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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 is 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 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 share successes, innovations, good practices, and experiences.
- Program monitoring, technical assistance and required follow up 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 that commonly observed in the following areas:

1. 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.
2. Fiscal:
 - No annual program specific audit findings.
 - Monthly reports are always in on time and correct.
3. Technical:
 - Provide comprehensive service utilizing the latest hot climate standards, in a cost-effective manner in accordance with GEFA guidelines.

A “High Performance” agency may select between annual monitoring that is reduced in scope and with a smaller sample or a standard monitoring visit every 18 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 lead-based paint procedures, cost allocation plan/indirect rate, 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 set-ups current
 - Staff proficient in its use
 - Evidence NEAT is used
3. Staff and contractors have demonstrated proficiency in technical applications including diagnostics.

Standard Performance Cont'd

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.
11. Agency production is low relative to funding.
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.

At-Risk Performance Cont'd

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 Weatherization 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, 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 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 (*timeliness of submission*), and Building Check and Job Order Sheets for accuracy 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 Weatherization Field Guide, issued in 2004, is a resource guide to Best Practices for improving the comfort, safety, and efficiency of existing homes.
2. Policies and procedures adopted for the Weatherization 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, spillage, flue draft, carbon monoxide, as well as a visual inspection. This procedure also contains safety thresholds. This test must be performed and recorded, at a minimum, at the time of audit and final inspection. The test report form is to be completed on all homes that contain combustion appliances and maintained in the client file.
4. The determination of which measures will be installed is based upon the National Energy Audit Tool (NEAT/MHEA) and the Priority Lists. Agencies are responsible for keeping set-up values (i.e. installed measure costs and fuel costs) current.
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 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.
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.

Technical Monitoring Reference Material Cont'd

11. Health and Safety related repairs within the scope of weatherization services include the following:
 - Heating system replacements
 - Materials to reduce excessive carbon monoxide to acceptable levels or below.
 - Heat exchanger replacements or repairs
 - Burner replacement or repairs
 - Combustion air venting systems repairs or replacements
 - Repair of gas leaks, including necessary materials
 - Chimney cleaning and lining
 - Water heater tank replacements

12. Allowable repairs which can be completed within the limits of weatherization funding must be associated with an eligible weatherization measure such as the following:
 - Mechanical ventilation system materials
 - Electrical repair materials
 - Plumbing repair materials
 - 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
 - Clothes dryer venting

13. 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 carbon monoxide detector 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 and duct sealing work.
4. An infrared scanner 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 houses inspected and to record extraordinary circumstances or work performance.
6. Magnahelic 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 pressures of mechanical fans.
8. Pressure pan to test effectiveness of duct sealing work.

Technical Monitoring Procedures

Georgia Environmental Facilities 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
- 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; and
- Determining training and technical assistance needs.

The GEFA representative will prepare, and make available to the local agency, an **Agency Monitoring Plan (AMP)** prior to each visit based on the information gathered from the following sources:

- Pre-Monitoring Questionnaire, which will be distributed at least four weeks prior to scheduled visit
- A List of completed units from the period to be monitored
- The local agency's most recent financial audit.
- Past monitoring reports and resolution of corrective action requirements.
- Monthly Reports.
- Resolution of corrective action requirements.
- Agency identified needs.

Phase I:

- GEFA representative will notify the local agency of upcoming monitoring visit and make available all the necessary forms for completion. (*PMQ, List of Projects*)
- 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 select randomly the units to be inspected.
- The GEFA representative will prepare the Agency Monitoring Plan (AMP)
- 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.

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 comments are also encouraged to help determine their satisfaction with the results of the work.

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 audit are checked to ensure they are current and accurate, that agency staff is proficient in the use of the NEAT audit, 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 Coordinator and other appropriate staff will be held at the conclusion of the monitoring visit to present and discuss preliminary findings 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 and, if necessary, 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

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

Finding: There are two types we will use in our monitoring reports:

Major finding: Noncompliance issues that are of significant concern, such as, health and safety, eligibility, potential liability, misuse of funds, or consistently failing to follow program rules, standards, or specifications, (such as Whole House Weatherization).

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 wrap the first five feet of hot water pipe from the water heater).

Reminder: Observations and suggestions are to assist with compliance of program requirements or to enhance or improve service. 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 Facilities Authority.

Agency Monitoring Plan

A basic level of core monitoring will occur as part of every monitoring visit. In addition to the core monitoring, the Agency Monitoring Plan (**AMP**) will be an integral aspect of each monitoring. The sequence and timeliness outlined below will precede annual monitoring visits. If any agency is monitored more than once within a contract year, some steps may be omitted.

1. The assigned monitor will contact the agency to be monitored to request a list of projects completed within the prior program year. The following information will be provided for each project:
 - Client name and Job number
 - Job start/completion date
 - Total funds, broken out by funding source
 - Fuel type
 - Housing type (Brick, Asbestos, Crawlspace)
 - Contractor(s), if applicable
2. The agency will return, via email, the requested information within two weeks.
3. Within three days of receipt of the above referenced information, the monitor will identify 10% of completed projects to be inspected.
4. The GEFA monitor will send an electronic copy of the 'Pre-Monitoring Questionnaire to the agency for completion.
5. The agency will complete, and return by email, the Weatherization Pre-Monitoring Questionnaire. This process will be completed within three weeks.
6. The Agency Monitoring Plan (**AMP**) will be developed based upon the information submitted and all other documentation available to the monitor.
7. The Agency Monitoring Plan will be sent to the agency prior to the monitoring visit.