

Section 4 – Reports and Recordkeeping

I. Client File Requirements

The purpose of this section is to inform subgrantees of specific documentation to be maintained in each client file. This section also provides general guidance to subgrantees on how to comply with requirements specified in 10 CFR 440.16(g) on reporting completed homes. The State and each WAP subgrantee receiving federal financial assistance will keep records and make reports as required by 10 CFR Part 440.24 and 10 CFR Part 440.25.

The DNR/DE has developed a web-based program called MoWAP to assist with reporting, tracking, data retention, etc. MoWAP can be accessed at <https://www.dnr.mo.gov/MoWAP>. This program allows for subgrantees to track client files through all stages of weatherization. Required forms and documentation must be uploaded onto the individual client file. All documents must be signed, dated and legible. Each client file must contain the following documents:

II. Required Forms and Documentation to be Uploaded on the MoWAP Client File

A. The Application Form

This form is generated by MoWAP. Completed applications can be generated after the client file has completed the intake stage. Blank applications are available under the reports tab of the main menu. Signed application forms must be uploaded to the client file.

B. Proof of Income Documentation

All income documentation proving client eligibility must be uploaded to the client file.

C. Re-verification of Income Form (if applicable)

This form is an agency-developed form that is required if the initial income verification is more than one year old at the time of the energy audit. This form should be signed and dated by the client and designated agency personnel. The DNR/DE recommends that if the client's initial income verification is more than one year old at the time of the energy audit, the client be required to return to the county outreach office to provide current income documentation. If income re-verification is required, then the new income documentation must be uploaded to the client file.

D. Proof of Home Ownership

Please see Section 2, Subsection IV, part B3 for a listing of eligible home ownership documents. These documents must be uploaded to the client file.

E. Landlord Agreement Form (if applicable)

This form provides authorization from the client's landlord that they give permission for

their property to be weatherized and that they agree to specific requirements as outlined in *Section 2*. Completed landlord agreement forms can be generated on MoWAP after the client file has completed the intake stage. Blank landlord agreement forms are available under the reports tab of the main menu. Completed landlord agreement forms must be uploaded to the client file.

F. Landlord Proof of Income Documentation (if applicable)

If the requirement that the owner/landlord provide a minimum of a five percent (5%) cash contribution to the project is waived because the owner/landlord's annual taxable income is at or below two hundred percent (200%) of the federal poverty level, then the owner/landlord's income proving eligibility must be uploaded to the client file.

G. NEAT and MHEA Audit Data

The NEAT/MHEA Input Report and the NEAT/MHEA Recommended Measures Report (Output Report) must be uploaded to the client file.

H. Section 106 Documentation

Per the recordkeeping requirements of the programmatic agreement between the DNR/DE and the Missouri State Historic Preservation Office (SHPO), the following must be uploaded to the client file:

Photos of the home (including streetscapes and any additional out-buildings)
Project Information Form and associated response letter(s) (if applicable)

I. Invoices, Bills for Materials and Labor Charges

All invoices, bills for material and labor charges, or a reference to such if combined in a single document by the supplier, must be uploaded to the client file.

J. Emergency Services

If a client receives emergency services that require a signed and dated physician statement, then the physician's statement, including all documentation describing the need for emergency services, must be uploaded to the client file. If a client received emergency services that didn't require a physician statement, all documentation associated with the need for the emergency service must also be uploaded to the client file.

K. Utility Bills

A copy(s) of the client's utility bill, that clearly shows the client's account number, must be uploaded to the client file.

L. Other (if applicable)

Documentation of approval for case-by-case exceptions to policy granted from DNR/DE or DOE.

III. Required Forms and Documentation for the Physical Client File

A. Agency Work Order Form

This form is an agency-developed form identifying the estimated materials and work to be completed, and a list of actual costs for materials and labor for the completed job. The work order form can also be printed from the NEAT and MHEA Audit software. This form should be signed and dated by a weatherization auditor.

B. Heating System Information to Include:

- Mechanical Systems Audit Form, including all required diagnostic testing information (see the *Technical Standards section*)
- Worst Case Draft Test Form (for applicable homes) (see the *Technical Standards section*)
- Clean and Tune Work Order Form (if applicable) (see the *Procurement section*)
- RFQ/Contract for Furnace Replacement (if applicable) (see the *Procurement section*)

C. Work-Order Change Notices

This form is an agency-developed form that should include all additions or deletions to the job. The auditor or crew supervisor and the contractor (if applicable) should sign and date this form.

IV. Definition of a Home in Progress, a Completed Home, and an Amended Home

A. Home in Progress

A home in progress is a home for which one of the following applies: (1) energy conservation measures (ECMs) have actually commenced, (2) specialty items have been ordered that cannot be returned to the vendor or (3) the home has been awarded to a contractor.

B. Completed Home

A completed home, or unit, is a home in which all weatherization measures have been installed according to the work plan, or as documented in a change order request, and the subgrantee, or its authorized representative, has conducted a final inspection and certified that the work has been completed in a professional manner, in accord with WAP work standards, and in accordance with the priority determined in 10 CFR 440.

10 CFR Part 440.16 (g) states the following: No dwelling unit may be reported to DOE as completed until all weatherization materials have been installed and the subgrantee, or its representative, has performed a final inspection(s) including any mechanical work performed and certified that the work has been completed in a workmanlike manner and in accordance with the priority determined by the audit procedures.

No dwelling unit may be reported as a completed unit until it meets the above criteria. Before reporting a completed home, DNR/DE requires all homes pass a final inspection by subgrantees. Expenses associated with a home that fails a DNR/DE inspection may be withheld from the Subgrantee's subsequent reimbursement until the home passes.

C. Amended Home

An amended home is defined as a home that has previously been reported to DNR/DE, but due to a variety of reasons such as client call-backs, equipment malfunction, and monitoring required re-work, additional costs must be charged to the job. Generally, there should be no amendments made to a home after 12 months from the time the job has been reported to DNR/DE

Due to WPN 11-03 (*Attachment 4-8*), subgrantees may not charge the WAP for additional work amendments on homes weatherized after January 10, 2011. Subgrantees may use other fund sources, such as utility funding, that are not included as a part of their DOE WAP budget plans to pay for the costs associated with these activities.

Correction amendments for financial revisions to client files are still allowed.

D. Reporting Homes

Homes may be reported as complete in one of two categories: (1) a home for which all cost-effective measures have been completed within cost guidelines, or (2) a home for which all cost-effective measures have not been completed because of a complication involving the homeowner or occupant. For example, a home will be reported as complete if the client (1) refused certain types of work dictated by the audit, (2) moved, or (3) died and material costs were incurred before all work was finished.

If at all possible, completion of WAP service will be attempted. However, if the new owners do not want the work to be completed, or the work cannot be finished, the home may still be counted as a completed house. If the home is reported and counted as a completed home, it is ineligible for weatherization services at a later date, even if all ECMs identified during the energy audit were not performed.

V. Leveraging Activities

Federal regulations allow weatherization funds to be used for leveraging activities. Under leveraging, subgrantees work at developing relationships with property owners, utility companies and other entities that generate non-Federal resources for the program. Non-Federal resources are

used to supplement the program and expand energy efficiency services and/or increase the number of dwelling units completed for weatherization eligible clients.

Subgrantee agencies may request up to, but no more than, five percent (5%) of their grant allocation for leveraging purposes. Subgrantee requests for leveraging must include specific planned leveraging activities, targeted partners (e.g. landlords, utilities or other agencies), and estimated outcomes including dollar amounts. If agencies do not initiate meaningful leveraging activities, the funds may be considered as state carryover and may be redirected to other agencies.

Utility funds for weatherization obtained by the DNR/DE through utility regulatory cases or other actions may not be reported by subgrantees as leveraged funds.

Landlord contributions are technically a form of leveraged funds but they are not a part of the grant and are not counted under leveraging activities. As described in *Section 2 – Client Services*, landlords must provide a minimum of a five percent (5%) cash contribution of estimated labor and material project costs before weatherization work can begin on a home.

Contributions received from the owner/landlord are not to be reported as Program Income and should be applied to the cost of the home being weatherized in order to reduce that home's weatherization expenditures.

The amount of contribution above the required minimum five percent (5%) cash contribution is left to the judgment of the subgrantee. These funds are not voluntary (in most instances) and, therefore, are treated differently than traditional leveraged funds. The expenditure of these funds must be in accordance with the landlord contribution agreement made with the State or local agency.

DNR/DE and DOE encourage subgrantees to form partnerships with other Federal programs [10 CFR 440, Section 440.16(e)]. These funds, partnered with Weatherization funding, will supplement the Weatherization program and are not considered leveraged funds.

Generally, leveraging is not considered program income; however, program income is a form of leveraging. Leveraged resources are not considered to be program income for the purposes of the WAP. See *Section 5 – Financial Management* for additional leveraging information.

VI. Monthly Reporting

10 CFR Part 440 authorizes U.S. DOE to collect such reports as it deems necessary to carry out its responsibilities. The Missouri Weatherization Assistance Monthly Report collects information needed to operate the program and to report required information to U.S. DOE. The agencies do not have to compile this report, as MoWAP collects all of the necessary information.

All agencies are required to submit **ARRA** monthly reimbursement requests to the DNR/DE Weatherization Program by the **10th** day of each month. If an agency has no homes to report and is requesting no reimbursement, then an e-mail notification is required to be sent to DNR/DE.

All agencies are required to submit regular DOE, utility, and other applicable subgrant (Utilicare, LIHEAP, etc.) monthly reimbursement requests to the DNR/DE Weatherization Program by the **14th** day of each month. If an agency has no homes to report and is requesting no reimbursement, then an e-mail notification is required to be sent to DNR/DE.

The final reimbursement request must contain any receipts from the sale of equipment and/or vehicles that have not been used to offset program operation costs or equipment purchases. These documents must be uploaded to the reimbursement.

VII. Quarterly Reporting

Failure to submit progress and financial reports on time may result in cancellation of the subgrant agreement or other penalties as determined by DNR.

All agencies are required to submit the quarterly **ARRA** reports to the DNR/DE by the **10th** day of the month following the quarterly reporting time frame. All agencies are required to submit the **regular DOE** quarterly reports to the DNR/DE by the **14th** day of the month following the quarterly reporting time frame. MoWAP will generate the Primary Heating System Fuel Type Report and the Waiting List Report. Agencies are required to submit the following quarterly reports:

Other Fund Sources Report (*Attachment 4-5*)

Woman Business Enterprise/Minority Business Enterprise (WBE/MBE) Report and Instructions (*Attachment 4-6*)

Training and Technical Assistance Activities (T&TA) Report (*Attachment 4-7*)

The quarterly reporting time frames are as follows:

1st Quarter	July 1 – September 30
2nd Quarter	October 1 – December 31
3rd Quarter	January 1 – March 31
4th Quarter	April 1 – June 30

VIII. ARRA Reporting (OMB 1512)

ARRA Progress Report (OMB 1512)

All agencies are required to submit the ARRA Progress Report for each ARRA subgrant, as well as a Check Register printout for the appropriate grant (showing check date, check number, check payee and total check amount for every payment made by agency during reporting period) to the DNR/DE by **noon of the 3rd business day of the month** following the quarterly reporting time frame. Special Note: As new ARRA reporting guidelines are received, new requirements may be implemented.