

Attachment C: Expectations (What is the QAQC Team looking for?)

This document is meant to give you a picture of the kinds of items that the QAQC team will be looking at during your QAQC visit. Some of these issues, especially in administration, are “black and white” items required by the law or Statement of Policy. Other items are meant to gauge how the Program is being run. The QAQC process is divided into three areas: Financial Review, Administration & Functionality, and Project Site Visits as described below.

District Financial Review

The section below outline items that the QAQC team will be looking for when they complete a District’s Financial review. This is not a complete list of every item that the QAQC team would ask for or evaluate. It is meant as a guide for Districts to use for their upcoming QAQC evaluation. The documents and forms listed below are available on the QAQC page of the Center for Dirt and Gravel Roads Studies website at <https://www.dirtandgravel.psu.edu/pa-program-resources/quality-assurance-quality-control-qaqc>

- Is there evidence of proper financial & accounting practices?
 - Are D&G funds separate accounting? (§83.607.k)
 - Are D&G funds kept in an insured account? (§83.607.k)
 - Is interest used only for D&G projects (§83.607.k) Interest can ONLY be used for projects, even interest from admin/edu accounts.
 - Is Administrative spending kept within the 10% limit? (§83.608.b.4.ii) What was it spent on? (§83.607.k) Contract, General Conditions II.H)
 - Education spending kept within the 10% limit? What was it spent on? (§83.608.b.4.i, Contract, General Conditions II.I)
 - Does the District supply sufficient evidence that all DGLVR grant money was spent on eligible expenses? (ie, ESM practices, labor, materials) Receipts must be kept in the contract file showing grant money was spent on eligible expenses. Receipts must total to final grant amount paid to grant recipient.
 - Has District submitted quarterly reports on time? Are they accurate and include all necessary information?
- Have they spent DGLVR project funds within 2 years? (Contract, General Conditions II.J)
- All expenses are in line with program policy as per the Administrative Manual
- Itemized accounting broken out into:
 - D&GR
 - Administration
 - Education/Training
 - Projects
 - Interest
 - LVR
 - Administration
 - Education/Training
 - Projects

- Interest
 - Appropriate cost allocation methods utilized
 - GIS quarterly report account balance accurately reflects local account balances
 - All expenses are properly documented (invoices, receipts, lease, etc)
 - Expenses accurately reflect figures entered into quarterly report
 - Quarterly reports completed properly
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Administration and Functionality

The sections below outlines items that the QAQC team will be looking for when they complete a District's Administration and Functionality review. This is not a complete list of every item that the QAQC team would ask for or evaluate. It is meant as a guide for Districts to use for their upcoming QAQC evaluation. A majority of this review comes from the QAB and District staff interviews. However, there are things that will be observed during project site reviews that relate to administration as well.

What is Functionality?

Far from the "black and white" administrative aspects of the Program, which are typically written in the Administrative Manual or other documents, the Functionality part of the process looks at how the Program is being run and the involvement of the people within the County. The major tool for assessing functionality is the interviews with District Staff, QAB members, and project participants. Obviously, the amount of funding a District receives will have a bearing on the number of projects completed and the District's level of involvement. Below are some general areas the group will be looking at:

All documents and forms listed below are available on the Center for Dirt and Gravel Roads Studies website at <https://www.dirtandgravel.psu.edu/pa-program-resources/quality-assurance-quality-control-qaqc>

Hard File & GIS Review

- **See contract hard file checklist**
 - The QAQC team primarily uses this form to review a contract hard file.
- Are the District's GIS and hard-copy files current? Is GIS system updated quarterly?
 - Hard copy files must include a signed contract, application, attachments, receipts, and signed performance report that is consistent with each other.
- GIS is up to date and completed accurately. Project information entered in the GIS accurately reflects what was completed on a project. Funding for the project is recorded properly in the GIS system. Etc.
 - GIS records should reflect these same figures. Additionally, properly completed stream crossing forms, traffic count forms, Off Right-of-Way forms, Contract Amendments, and DSA Certification and Testing must be kept in the files.
- Is the District keeping sufficient evidence that the provisions of the Prevailing Wage Act are being followed?
 - The District must keep sufficient evidence that the applicant is following the prevailing wage act requirements. This is done through copies of the certified payroll form that is an attachment to the contract.

Quality Assurance Board & Local QAB Policy Review

- **See QAB interview checklist**
- Must have 3 voting members and 1 non-voting chairman maximum
- Does the QAB have alternate voting members appointed?
- Does each member participate in meetings?
- Does each member understand how a QAB is required to function and their role on the QAB? Are they active in the program and understand the goals, objectives, and policy of the Program? Or are they just there as a “Yes” vote.
- Have they been to program trainings recently? ESM training/ Annual workshop / Admin Training?
- How are projects ranked for funding?
 - Does QAB visit application sites?
 - Does someone from District visit sites in the field and report back to QAB?
 - Are decisions made from applications without site visits?
 - Are QAB recommendations acted on by the District Board?
- How does the QAB select projects to recommend to District Board for funding?
- Is the District complying with provisions of the PA Sunshine Act?
 - The District should provide evidence that all QAB meetings are following the provisions of the PA Sunshine Act. For example, a copy of a newspaper article with the date, time, and location of the QAB meetings.
- Does the District board regularly act on adopting the policies and project recommendations of the QAB? (§83.607.d)
 - QAB is an advisory group only. The District Board must approve all policies and project funding.

District Staff

- **See attached District Staff interview checklist**
- Attend required trainings.
 - What all trainings have Staff been to?
 - Does the QAQC team observe the need for Staff to attend additional training?
 - Is District staff going above and beyond the training requirements?
 - Searching out other training opportunities not provided by the program
 - Participating in webinars
 - Etc.
- What aspects of the program is staff involved? See interview checklist.
- Staff ensuring program goals/policy's are followed properly?
- How is staff ensuring prevailing wage requirements are followed?
- Does the district have documentation that application has been made for all required permits? (§9106.f(2))
- Is the District following all policies in the DGLVR Program Administrative Manual appropriately?
 - Stream Crossings replaced at 100% bankfull width?
 - Contract amendments 20% or less of contract,
 - traffic counts being completed properly,
 - DSA policies/specs,
 - Engineering held to 10% or less of contract amount, etc.
 - Etc.
- Schedule of payments - Policy allows for up to 50% advance and requires at least 30% be withheld until project closeout.

- Do they advance funds to municipalities? (§83.611.b)
- Did they keep advances 50% or less? (§83.614.c(1))
- Did they hold at least 30% of the grant amount until project completion and final certification? (§83.614.c(3))
- How does the District handle D&G cost over-runs?
 - Overruns of up to 20% of the original grant can be handled through a signed amendment form.
 - Cost changes of over 20% require a new contract to be written.

Education / Outreach

- See attached District Staff interview checklist
- How is the District promoting the program locally?
- What is the municipality's knowledge of the D&G Program?
- Is the District doing sufficient education and outreach?
- What types of E&O is the District doing?
- Are municipalities that have not completed projects getting the word about the Program.
- Are municipalities with completed projects satisfied with the District and the Program?
- District offering sufficient outreach and education to potential applicants
- Does the District get more applications than funding?
- Notifying all potential applicants of available funding / application periods
- What outreach education activities does District provide?
 - Demo days?
 - Host annual meeting / workshop?
 - Individual outreach sessions to each potential applicant/municipality?
 - Etc.

Project Inspection / Oversight / Pre-project planning / final inspection

- See attached District Staff Interview checklist
- How involved is the District in planning projects?
 - Are Districts conducting pre-application meetings for all or most projects?
 - How involved is the District in the pre-application process?
 - This ranges from Districts who co-design projects with applicants, to Districts who meet on site to suggest application improvements, to Districts who simply “rubber stamp” applications with a yes/no as they come in.
 - Districts should help applicants revise workplans to meet program policy, goals, and objectives.
- Are preconstruction meetings being held for projects?
 - Important to ensure the project participant, sub-contractor (if applicable), and District are on the same page with the expectations for the project
- How involved is the District in project implementation and oversight?
 - How often is the District on site when work is being done?
 - How accessible is the District during project work?
 - Is the District notified before a project begins?
 - Does the District ensure program policy, goals, and objectives are met.
 - If problems exist, is District discussing those with applicant and ensuring they are fixed properly.
- What is the final inspection procedure?

- Ideally, the District and Municipality will do a final walkthrough of a completed site together. This allows the Project Performance Report to be completed on site and signed by both parties, effectively closing out the project. Some Districts also involve the QAB in “after” site visits.
 - Project installed inline with program policy / goals / objectives prior to final payment
 - Project completion report completed properly.
 - Deliverables reported properly
 - Expenditures reported properly
 - Check to ensure funds were actually spent on project
 - Example: if applicant provides invoices for 5 pipes, ensure the project actually has 5 pipes installed.
 - Sufficient invoices / receipts to account for funding
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Project Site Visits

The intent of site visits during the QAQC process is to see how effectively Program principles are put into practice. The list below is meant for Districts to get better understanding of what the QAQC team is looking for when evaluating project sites. This is not a complete list of every item that the QAQC team would look for or evaluate during a project site review. It is meant as a guide for Districts to use for their upcoming QAQC evaluation. There are things that will be observed during project site reviews that relate to administration as well.

In the end, the most important question to answer may be: “Is the Program making strides to reduce sediment pollution and improve the way project participants maintain their Dirt, Gravel, and Low Volume Roads?”

Project Logistics

- Does what is in the field match the application, contract, performance report, receipts, and GIS data (both location and deliverables)?
- Was the project an effective use of D&G money?
 - How cost-effective was the project?
 - Were project expenditures within normal ranges?
- Were the sites impacting water quality in the first place?
 - Was there a stream/wetland impact from the site?
 - Does the road impact the stream?
 - Proximity to waterway?
- Program Policy
 - Was the project implemented within the guidelines set by the Program?
 - Was drainage and base addressed prior to surfacing
 - Stream crossings meet the minimums set in the Programs Administrative Manual.
 - Eligible for replacement?
 - Meet installation requirements?
 - Stream crossing evaluation form properly completed and kept in the file

- Off Right-of-Way work on project?
 - Within program's policy
 - Received written SCC permission for off right of way work that is:
 - More than 35% of the total cost of the project
 - More than 500 feet off right of way
- Full Depth Reclamation
 - 3rd party mix design
 - Notified CDGRS prior to contracting
- LVR traffic count
 - Level of count utilized.
 - Count completed in allowable timeframes and dates
 - Is it under 500 cars ADT?
 - Form completed properly and kept in the contract file

Project Effectiveness

- Have ESM principles of “drainage disconnection” been used?
 - There should be a lower volume of water, and less sediment, reaching the stream as a result of the project.
- What is the problem that the project addressed?
 - What was occurring on the project site before the project was implemented
 - How did the project address those problems?
- How effective are the practices that were used?
 - Are there any unaddressed drainage, base, stream crossing, or surface issues affecting the project, stream, or road?
 - Was the appropriate ESM practice utilized to correct the problems?
 - What improvements were made to the stream/water quality?
 - What improvements were made to the road?
 - Were the practices used appropriate to the situation and installed properly?
 - For example: There may be a pipe installed, but: does it have a headwall? Is it at an appropriate angle, location, or depth? Are there enough pipes installed? Etc.
- Were beneficial ESM practices overlooked? How far beyond “DSA and pipes” did the District go, if needed? Applying DSA and installing pipes can be an effective project. DSA reduces surface erosion while adding pipes divides road drainage. But many times we have seen projects stop at “DSA and pipes” where other practices would have been beneficial. Are other more “innovative” practices being used where appropriate such as underdrains, French mattresses, grade breaks, shallow pipes, vegetation management, road fill, berm removal, etc.

Other Project Considerations

- What project strategies is the District using? Which may be helpful to consider?
 - These could include general project funding policies such as: not funding DSA, required use of DSA on all projects, use of dust suppressants, phasing projects to complete drainage before DSA, many small projects vs. few large projects, etc.
 - Is the Program having an effect on the way the project participant maintains their roads outside of funded projects?
 - How effectively are previously funded projects being maintained?
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