



COMMONWEALTH OF PENNSYLVANIA
STATE CONSERVATION COMMISSION

Date

Conservation District

Dear _____ Conservation District,

Thank you for participating in a Dirt, Gravel, and Low Volume Roads Program Quality Assurance / Quality Control (QAQC) visit. The QAQC team will be visiting your District on _____. The purpose of the visit will be to insure the Dirt, Gravel, and Low Volume Roads Program is being administered properly and to work jointly to improve the Program at both the local and State level. Please review the enclosed information and agenda.

We are requesting that your District complete some preliminary actions prior to the team's visit. This will allow the team to review some basic information beforehand so they can make better use of the limited time during the QAQC visit. Please make sure to review **Attachment A** for a list of these requested actions.

Please find the following documents attached for further details:

- **Attachment A**: Pre-Visit Checklist for the District
- **Attachment B**: QAQC Visit Agenda (schedule of what to expect for visit)
- **Attachment C**: Expectations (what the QAQC team will be looking at)

Sincerely,

Justin Challenger,
SCC Dirt, Gravel, and Low Volume Roads Program

How has the process changed since the second round of QAQC visits? We are trying to:

- *spend more time in the field, potentially even visiting a "potential" site;*
- *have the municipalities become more involved in the process*
- *Provide more time to discuss difficulties the District is facing*
- *Keep the process a learning experience for the Districts and the QAQC Team*

Attachment A: Pre-Visit Checklist for the District

Please complete these tasks at least three weeks before your visit:

- Schedule Interviews:** Contact the people listed below and request that they come in to the District Office for a brief interview between 1:00PM and 4:00PM on Day 1 of the QAQC visit. If possible, please schedule all QAB members for an interview at the same time. If they will be unavailable, please provide contact information so they can be interviewed over the phone before the visit.
 - All QAB Members & Alternates, at the same time, if possible
 - ANY District Staff involved in the Program
 - District Board Chairman or Board Designee

- Municipal Officials:** Contact the municipal officials responsible for the project sites listed below. Attempt to have the municipal officials onsite during the field site review for their project. Additionally, if they would like to be a part of the interview time frames, please have them scheduled for an interview time.

- Make copies of the following three project files and submit them:** (including all receipts and a copy of the itemized project spending form)
 - **Project 1**

 - **Project 2**

 - **Project 3**

- Make copies of the following material, if available, and submit them:**
 - List of QAB members names, affiliations, and role on QAB
 - QAB policies:
 - Project ranking criteria sheet
 - Equal access criteria
 - Environmental standards for products and practices
 - QAB rules of conduct
 - Any other adopted policies
 - Minutes from your last three QAB meetings.
 - Minutes from your last Board Meeting where DGLVRP issues were acted on (approving projects for funding, etc).
 - Contact information for all eligible applicants (municipalities, state agencies, etc.) in your county including phone numbers and email addresses.
 - Itemized administration, training/education, and project spending for the previous year.

- Have the person responsible for administering the Dirt, Gravel, and Low Volume Roads Program** in your county review:
 - The District's previous QAQC report.
 - The three projects listed above. Whether they were involved with the projects or not, we will be able to have a better discussion if they refresh or familiarize themselves with these projects prior to the visit. If current staff was not involved in the requested projects, consider having them visit the sites before the QAQC team arrives.

- Ensure that all your GIS Data has been updated and is current, and check to ensure it is accurate.

Submit all preliminary information to:

Justin Challenger
jchallenge@pa.gov
State Conservation Commission
2301 North Cameron Street, Room 311
Harrisburg, PA 17110

Attachment B: QAQC Visit Agenda (3 day visit)

PRE-VISIT

- Please submit the items in Attachment A at least **three weeks** before your visit.
- **Your DEP “Field Rep” will be contacting you at some point prior to your visit.** In order to better prepare and spend time more efficiently during the visit, the Field Rep will be completing the “QAQC Preparation Checklist” at some point prior to the actual visit.
- *There are a wide variety of documents the QAQC Team uses during the QAQC Process. These documents are available for your review/use and are located in the QAQC section of the Center for Dirt and Gravel Roads Studies website. (<https://www.dirtandgravel.psu.edu/pa-program-resources/quality-assurance-quality-control-qaqc>)*
- The QAQC team may arrive in the area before your visit to review and discuss preliminary material. You may be contacted if they have questions.

DAY 1 (Partial Day ~10am-4pm) scheduled for interviews and administrative reviews.

~10am-11am Arrival, introductions, and review of agenda and preliminary report
- Will be completed at the District Office

11am – 4pm Interviews of manager, staff, Board Chairman and QAB members
- **District should arrange interview times for staff and QAB members** ← District Task
- **Try to arrange all QAB member interviews for the same time.**
- **District Board Chairman or Board Designee**
- Individual interviews will take approximately 20 minutes.
- Will be completed at the District Office, please have a conference room available if possible.
- Any questions that arose during the administrative or project file review will be addressed as well.
-

4pm We will try to be finished at the District before 4pm. We are able to work with your time schedules. Let the QAQC team know in advance if you would like to revise the time frames.

DAY 2

Field Site Visits and Wrap Up

~8am to 4pm Visit to field sites

- At a minimum, the person responsible for administering the D&G Program for the District must accompany the group. The District Manager is also encouraged to attend. Anyone else at the District, including the District Board and QAB, is also invited.
- Contact the municipal officials responsible for the sites selected for file review. Have these officials present onsite during the project review, if feasible.
- We will plan to have lunch as a group at a restaurant between sites.
- Ideally, we will visit at least the three sites that were submitted.
- We will visit at least one site that has been contracted but construction has not started yet.
- We may visit additional sites as time and travel allows.
- We may visit a current contract or application site that has not been completed as time and travel allows. (opportunity for District to get input or help on an upcoming project)

DAY 3

Field Site Visits and Wrap Up

8am to 12pm Additional Time for Visit to field sites if needed

- At a minimum, the person responsible for administering the D&G Program for the District must accompany the group. The District Manager is also encouraged to attend. Anyone else at the District, including the District Board and QAB, is also invited.
- Contact the municipal officials responsible for the sites selected for file review. Have these officials present onsite during the project review, if feasible.
- We will plan to have lunch as a group at a restaurant between sites.
- Ideally, we will visit at least the three sites that were submitted.
- We will plan to visit at least one site that has been contracted but construction has not started yet.
- We may visit additional sites as time and travel allows.
- We may visit a current contract or application site that has not been completed as time and travel allows. (opportunity for District to get input or help on an upcoming project)
-

~12:00PM Exit interview and overview of findings

- The QAQC team will provide the District with an informal overview of their findings at the end of Day 2. The QAQC team will develop the preliminary report and present it to the District at a later date.

***The QAQC schedule is flexible and can be changed to accommodate the District's schedule. In some cases, the exit interview may be scheduled earlier or later as needed. These plans can be finalized at the end of Day 2. The QAQC team will also stay as long as necessary to address anyone's questions and concerns. If you would like to change the standard format of the QAQC, please contact the SCC ahead of your scheduled visit.*

Attachment C: Expectations

This document is meant to give you a thorough picture of the kinds of things that the QAQC team will be looking at. 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 two areas: Administration/Functionality, and Projects. There are a wide variety of documents the QAQC Team uses during the QAQC Process. These documents are available for your review/use and are located in the QAQC section of the Center for Dirt and Gravel Roads Studies website. (<https://www.dirtandgravel.psu.edu/pa-program-resources/quality-assurance-quality-control-qaqc>)

Administration & Functionality

1. Quality Assurance Board (QAB)

- a. Is QAB complete and do members attend? (§83.607.e)
- b. Adopted policies – *these policies should have been adopted long ago. They are required by various section of the SCC Statement of Policy.*
 - i. DGRP equal access criteria (§83.607.f)
 - ii. Written criteria for ranking projects (§83.608.b(3), §83.608.c)
 - iii. Environmental standards for products and practices (§83.608.b(6))
 - iv. QAB rules of conduct (§83.608.d(3))
- c. QAB Minutes (required) for past meeting dates. (§83.608.d.(2)) (§83.608.d.(1)) *Minutes of QAB meetings (at least date, attendance, and recommendations) are required by the Law & Statement of Policy. (Yes, QAB meetings are public.)*
- d. How are projects being ranked? *Is District Staff doing rankings? Does QAB visit project sites before, during, or after construction?*

2. District Accounting

- a. Is there evidence of proper financial & accounting practices?
 - i. Are D&G funds separate accounting? (§83.607.k)
 - ii. Are D&G funds kept in an insured account? (§83.607.k)
 - iii. Is interest used only for D&G projects (§83.607.k) *Interest can ONLY be used for projects, even interest from admin/edu accounts.*
 - iv. 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)
 - v. Education spending kept within the 10% limit? What was it spent on? (§83.608.b.4.i, Contract, General Conditions II.I)
 - vi. 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.*
 - vii. Has District submitted quarterly reports on time? Are they accurate and include all necessary information?
- b. Have they encumbered to a contract and/or spent D&G funds within 2 years? Is the District submitting replenishment requests in a timely manner? (Contract, General Conditions II.J)

3. District Administration

- a. 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.*
- b. Schedule of payments - *Policy allows for up to 50% advance and requires at least 30% be withheld until project closeout.*
 - i. Do they advance funds to municipalities? (§83.611.b)
 - ii. Did they keep advances 50% or less? (§83.614.c(1))
 - iii. Did they hold at least 30% of the grant amount until project completion and final certification? (§83.614.c(3))
- c. 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.*
- d. 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 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.*
- e. Does the district have documentation that application has been made for all required permits? (§9106.f(2))
- f. 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.*
- g. *Is the District keeping sufficient evidence that the provisions of the Prevailing Wage Act are being followed? The District should keep sufficient evidence that the applicant is following the prevailing wage act requirements. This could be copied of certified payroll receipts or copies of the bid package showing prevailing wage requirements.*
- h. *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.*

Functionality

Far from the “black and white” administrative aspects of the Program, 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 participating municipalities. 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:

- **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?
- **How involved is the District in planning projects?** Are Districts conducting preapplication meetings for all projects? How involved is the District in the preapplication 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.

- **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 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?
- **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.
- **What is the relationship between the District Board, the QAB, and District Staff?** In a program emphasizing “local control” among 64 different Districts, a great deal of variability can be expected. The major goal here will be to find out how the process is currently working in your District, and to make suggestions to improve the process where needed.

Projects

In the end, the most important question to answer may be: “Is the Program making strides to reduce sediment pollution and improve the way Municipalities maintain their unpaved roads?” Some considerations:

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.
- **How effective are the practices that were used?** 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.
- **What ESM Practices would have made the project better? How far beyond “DSA and pipes” did the District go?** 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.

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?

Other Project Considerations

- **What project strategies is the District using? Which may be helpful to consider?**
These could include general project funding philosophies 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 Municipality's maintain their roads outside of funded projects?**
- **How effectively are previously funded projects being maintained?**