

WAP Corner: CAN YOU BE EQUAL AND SPECIAL AT THE SAME TIME?

by Robert Adams

An anonymous author once wrote that, “*Nothing is so unequal as the equal treatment of unequals.*” Think about it. Don’t most government programs try to provide equal services to all those looking for help? Don’t we try to ensure that we treat everyone the same, without discrimination? And don’t we set up our programs and policies so that eligibility is transparent to all who apply? Of course we do. Government agencies and programs are designed to treat every taxpayer and citizen the same – absolutely equal - impossible to tell apart. The motive behind this policy is honorable. We should be proud that we don’t discriminate and we treat everybody the same. Except for one small thing – everyone is different.

If every person is different and it is people that make up local agency staff, then it is safe to assume that local agencies and the programs they operate are different. This also applies to those agencies that operate within a state under identical policies and procedures – like the local agencies in your state that operate the Weatherization Assistance Program (WAP).

In hundreds of homes each day, 970 local WAP service providers – community action agencies, city and county governments, and private non-profits – deliver WAP services. We conservatively estimate that at least 9,000 people work at the state and local offices and another 4,500 people work for private contractors who provide field services. At any time, there are probably 150 vacancies within the network - from state managers to material installers. At any time, there are new contractors being added to the network and recently hired staff learning their work “on the job.”

With all this fluctuation in staff and contractors, it seems impossible for state WAP offices to look at each of these agencies as “equal” and perform routine monitoring and quality control reviews in the same manner expecting the same results. After all, “*Nothing is so unequal as the equal treatment of unequals.*” This is not to say that everyone should be held to a different standard. High quality, professional services must be installed on every customer’s home. Each agency must document its activities appropriately and report its outcomes properly. The state should set a standard of excellence and expect all of its local agencies to achieve these goals and objectives and meet the criteria of a “good agency.” But what happens when an agency shows signs of failing in its achievement? What is the responsibility of the state in this situation? Or the local agency?

WHAT CONSTITUTES A “GOOD AGENCY?”

Before a state can determine whether a local agency is achieving its goals and objectives or not, the Program’s standards must be set. These include levels of acceptance for production, quality, appropriateness of service delivery, accountability, record keeping, file documentation, and fiscal accounting. These guidelines must be communicated to local agencies in contract and grant agreements, policy and procedure manuals, field guides, quality control standards, and other control documents. Once the state defines the standards and establishes the parameters for what constitutes a “good agency”, the state must then monitor each local agency routinely to determine

whether compliance to the policies and procedures is occurring. For the WAP to be properly administered by any local agency, a few generally accepted conditions must be present:

- The local agency must always serve eligible families. Eligibility may differ among funding sources but everyone who receives service must meet the guidelines of the funding source(s) being used to complete the project.
- Every home must receive an energy audit that details the work to be done. This audit can be site specific or part of a prescribed list of eligible services. The audit protocol can occur before the work begins or as part of the direct service delivery. Regardless of how or when the audit is performed, the audit results must be documented and contained in the customer's file.
- After the work is complete, the agency must document the services provided and account for the costs associated with the materials installed and the labor to complete the unit. There are a number of different accountability systems within the network and each serves a specific role. Like the energy audit, the system isn't as important as the existence of documentation in the file justifying the costs and that the documentation is accurate and reflects the actual work performed.
- Finally, every unit reported must have a quality control inspection. The inspection should be performed by someone who was not responsible for the actual work on the home. A signed inspection form, usually containing the comments of the inspector and the occupant, must be placed in the file.

Beyond these basic service delivery requirements, the nature of the agency's staff use, delivery strategy, organizational structure, and office operations will depend on the management style of the organization and the resources available to provide the WAP service. Remember, *"Nothing is so unequal than the equal treatment of unequals."* There are good agencies using direct hire crews and good agencies using private contractors to deliver services. There are good agencies using site-specific audits and good agencies using priority lists to determine service options. And there are good agencies using only DOE funds to weatherize homes and other good agencies that have multiple funding sources and can provide expanded programs for the families they serve. The central theme is that these agencies are all branded as "good" because their customers – the low-income families they serve – receive the services they deserve.

WHAT HAPPENS WHEN AN AGENCY NEEDS SPECIAL ASSISTANCE?

Everyone in the WAP network works hard everyday to meet the Program's expectations and provide the best service possible to those families in desperate need of help. But what happens when a local agency, through ordinary or extraordinary circumstances, finds itself unable to meet the goals and objectives of the WAP within the confines of its agreement with the state? Unfortunately, there are times when things happen that dramatically affect an agency's performance. For example, a local agency could lose its key WAP personnel for an extended period of time, causing production to fall far below the state's expectation. Or for some reason, the parent organization experiences financial troubles that adversely affect all the programs under its management. Or a local agency is unsuccessful in properly implementing new technologies or practices as mandated by the state.

Agencies experiencing these operational difficulties can no longer be considered "good" agencies or "equals" with their peers. These agencies require special attention from the state. In fact, it is incumbent upon the state WAP office to complete an investigation of the local agency and initiate corrective actions—training, technical assistance or whatever special attention is required to resolve

the issues facing the organization. This intervention must occur as quickly as possible before the local agency's difficulties result in improper actions that could become irreversible.

Of course, a single incident of non-compliance does not mean that the local agency is moving into some sort of crisis. It could simply mean that something was missed. Remember, the system is comprised of people and mistakes happen. If the agency properly remedies the situation, no further action is required and business continues normally. It is only when a problem is discovered and the local agency is without the necessary staff and/or resources to correct it that the agency becomes a candidate to receive special attention from the state office.

CAN WE AVOID THESE SITUATIONS?

Probably not! It is possible that one or two of your local agencies need special attention right now. Or maybe you are already working with these agencies to improve their chances of success.

One thing is certain – monitoring remains the “magic bullet” that every state needs to identify local agencies in need of special attention. The use of consistent, frequent monitoring to determine whether an agency is achieving its goals and objectives will provide the state WAP office with the information it needs to predict where the next intervention may be needed. And it can also provide an early warning system for the local agency so that future resources are not jeopardized to fix past mistakes.

As stated earlier, *“Nothing is so unequal than the equal treatment of unequals.”* You will always have agencies that are “good” and agencies that need special attention to make them better. While there may be fluctuation in the agency, low-income families should not have to gamble when they apply for services. They should expect and receive good service anywhere in the state they find themselves – maybe not equal, but always “good.”

(NASCS is developing a local agency intervention program in conjunction with the Midwest Regional Office. We will keep you informed as the project progresses.)