

DOE State Plan 2008

Comments

Introduction, page 1

Request OHCS change COCAAN to NeighborImpact. Also, on page 2, please change email contact to colleenn@NeighborImpact.org. This request was made last year as well.

Section 2.12.6 Special Populations page 30

NeighborImpact objects to the process of having agencies compete for Native American set aside funds. Agencies with recognized tribes within their service territory should be allocated the funds at the beginning of the grant period. This better serves Native American populations statewide, especially in rural areas where this funding is needed the most. We recommend OHCS work with agencies that receive funding and if, after six months, they have not identified eligible clients or obligated the funds, OHCS can work with that agency and their Executive Director to re-allocate funds to agencies with large Native American populations. Agencies should not have to compete for funding the way the current process is designed; funding should not be awarded to an agency because they have the best grant writer. We suggest that the previous issues around unspent Native American funding may have been an issue that could have been resolved by training, not penalizing agencies by pulling their funding.

Section 2.13 Monitoring pages 32-33

This section was not indicates as a change, but we appreciate the opportunity to comment. Only two types of agencies are identified – “Exemplary” and “At Risk”. Certainly there are agencies that fall in between these two categories. It was previously communicated by OHCS that **only** agencies employing Senior Energy Analyst Lead (SEAL) staff were eligible to attain “Exemplary” status. These are agencies that demonstrate a deep commitment to training and providing opportunities for their staff to pursue mastery skills. NeighborImpact supports activities that encourage agencies statewide to pursue SEAL status and discourages OHCS from removing rewards to achieve these goals. The reward for attaining “Exemplary” status is that agencies “may select between annual monitoring that is reduced in scope and with a smaller sample, or a standard monitoring visit every 18 months”. This language is vague (what exactly does “reduced in scope” mean?); we would support this to be articulated more specifically and have the monitoring for “exemplary” agencies once each biennium, not every 18 months.

Also, under the “At-Risk” designation, there is clear language identifying what constitutes an “At-Risk” agency, but no sense of consequences. We encourage OHCS to insert language that identifies consequences for agencies that fall into this designation; as well as language that involves contact with Executive Directors and strategies for resolving issues that caused agencies to become “At-Risk”. These strategies could include teaming with OHCS T&TA staff for additional attention outside of the

monitoring process, partnering with neighboring “Exemplary” agencies, additional T&TA support from OECA Instructors, etc... Training in Oregon has been demonstrated to be the single most effective tool that has catapulted our programs above others across the nation, let’s maximize training benefits for our own agencies.

Section 2.14 Certification – REM/Rate page 34

This language has changed since previous State Plans but not identified as a change in this plan. Are agencies no longer required to have staff certified in REM/Rate training? NeighborImpact does not support relaxing this requirement. There is no point in having staff provide extensive audits and inspections if staff are not properly trained to use the computerized audit tool.