



COMMUNITY ACTION PARTNERSHIP OF OREGON

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Tim Zimmer, Oregon WAP Coordinator
Oregon Housing & Community Services
North Mall Office Building
725 Summer Street NE, Suite B
Salem, OR 97301-1266

RE: U.S. DOE State Plan for 2010-11

Dear Mr. Zimmer,

Community Action Partnership of Oregon (CAPO) would like to acknowledge the substantial improvement in quality of services offered through Oregon weatherization assistance programs as a result of the training and certification process administered through the Residential Energy Analyst Program (REAP) operated by Oregon Energy Coordinators Association (OECA). The REAP training protocol, as developed by OECA, ensures that all students certified through the REAP training curriculum are qualified to not only determine the most effective methods for reducing ones home energy burden, but also to look and test for unsafe conditions in a home that could affect the health and safety of our clients.

As a network of agencies that share the mission to eradicate the causes and conditions of poverty in Oregon it is important to CAPO that weatherization services be offered in not only a cost effective manner that improves the quality of life for our clients, but also in a manner that ensures continued or increased safety. The REAP training protocol relies heavily on testing in the areas of combustion safety and building pressures which we believe are key to the safety of our clients.

CAPO is in support of OECA as the recognized provider of the REAP training program for weatherization workers, and would encourage the State, when considering other training programs, to authorize only those programs that are at the same high standard as the REAP curriculum.

Sincerely,

Sharon Miller, President
Community Action Partnership of Oregon

CC: Victor Merced, Director OHCS
Tom Clancey-Burns, Executive Director CAPO

Members ACCESS, Inc, Clackamas County Social Services, Community Action Organization, Community Action Program of East Central Oregon, Community Action Team, Community Connection of Northeast Oregon, Community Services Consortium, Community in Action, Klamath-Lake Community Action Services, Lane County Human Services Commission, Mid-Columbia Community Action Council, Mid-Willamette Valley Community Action Agency, Multnomah County Dept of County Human Services, NeighborImpact, Oregon Coast Community Action, United Community Action Network, Yamhill Community Action Partnership, and Oregon Human Development Corporation

CAPO President Sharon Miller, NeighborImpact **CAPO Executive Director** Tom Clancey-Burns **OEP Coordinator** Jess Kincaid

Associate Members Association of Oregon Community Development Organizations, Oregon Department of Education, Oregon Energy Coordinators Association, Oregon Food Bank, Oregon HEAT, Oregon Coalition on Housing & Homelessness

From: Meier, Jacque [JacqueMei@co.clackamas.or.us]
Sent: Thursday, January 14, 2010 3:28 PM
To: Tim Zimmer
Subject: DOE Draft State Plan Comments

I would like to provide comment to the DOE State Plan which is currently in draft form. These are not really anything that should be attached to state plan but I did have a few questions and or clarifications surrounding some things. I have highlighted them below.

There are typos throughout this document. **Example:1.05.3 under the direction of HCS (should read OHCS)?**
I would help with this if needed.

1.02 The subgrantees are comprised of 17 community action agencies; housing authorities; area agencies on aging; senior centers; a development corporation; and three (3) tribes. **This used to have "local government" in the description and is 17 the correct number? I hear so many different numbers but have not heard 17 in a very long time.**

Name: **Clackamas County Weatherization**

Address: PO Box 2950

City: Oregon City Phone: 503-650-3339

State: Oregon Zip: 97045

Contact: Jacque Meier

E-mail:JacqueM@co.clackamas.or.us

~~FAX: 503-635-8946~~ I do not know who's fax number this is. Mine is 503-650-3336

The agencies used to be in alphabetical order.

1.05.3

d. **Subgrantee Post-Installation Inspection** - Each weatherized unit **must** be inspected by the subgrantee to ensure that the work is in compliance with required specifications before the unit is reported to OHCS as completed. A complete inspection, signed by the subgrantee's inspector shall be placed in each job file. **In addition, subgrantee shall provide homeowner with a signed copy of the inspection form that includes a statement that the completed work is guaranteed for one year.**

I would like to know why this was decided and if agencies were asked for comment.

1.06 Each training is tied into an overall certification program (Residential Energy Analyst Program (REAP) **or equivalent certification program**), which is designed to bring the skill and competence level of all weatherization subgrantee staff and contractors to a uniform standard.

Who will determine "equivalent"?

1.06.2 Availability of T&TA funds

OHCS will determine the amount of T&TA Training funds to allocate to subgrantees based on availability of funding from DOE and the cost of planned trainings such as Energy Outwest and **REAP or equivalent certification programs**. **OHCS will hold back** (not allocate all available T&TA Training funds) and use T&TA Training funds to pay for subgrantees to attend trainings, conferences and workshops as prescribed within the T&TA Plan.

What costs does OHCS expect with the REAP certification program?

How much will OHCS “hold back” to pay for sub-grantees to attend trainings and how will the trainings be determined?

1.08.2

Jacque Meier
 Weatherization Program Manager
 Clackamas County Weatherization
 1810 Red Soils Ct Suite B
 Oregon City, OR 97045
 Phone: 503-650-3339
 Fax: 503-650-3336
jacquem@co.clackamas.or.us

Also please change Terry Weygandt to Knolls as well as her email and remove Tom Brodbeck from the committee list.

2.01.6

The primary area of confusion resides in the types of local agencies that are exempt/non-exempt from "status verification requirements." Local agencies that are both charitable and non-profit, which comprise about three-quarters of the local agency network, would be exempt. **However, those agencies which are designated as local government agencies operating the Weatherization Program would not be exempt; therefore, must conduct "status verification."** Under the DOJ ruling, grantees subject to this ruling have two (2) years to fully implement this procedure after the publication date of the final rule. As of this date the final rule has not yet been issued.

As a county agency am I to assume I am not exempt? If so is there a particular form I need to use and where do I obtain this form?

Expenditure Reports – On a quarterly basis, all subgrantees shall submit to OHCS reports of expenditures and completions towards program goals. These quarterly reports shall be considered amendable allowing for revisions. Any revisions or amendments to submitted reports shall be noted in the following quarter.

Will we be doing quarterly reports again?

Jacque Meier
Weatherization Program Manager
Clackamas County Weatherization
Phone: 503-650-3339

*Our office is **CLOSED** on Fridays . Normal business hours are Monday through Thursday 7:00am to 6:00pm. Effective January 1, 2010, the Clackamas County Department of Human Services will be known as **Health, Housing, and Human Services**. This new name more accurately reflects what we do and distinguishes us from state agencies.*

From: Steve Jole [smjole@gmail.com]
Sent: Saturday, January 16, 2010 10:13 PM
To: tim.zimmer@state.or.us
Subject: comments on state DOE plan

First of all I support the language change to REAP or equivalent certification programs.

I also think it is in OHCS' interest to put a time line on increasing OECA's capacity development and/or OHCS's equivalency approval.

To be consistent I believe the following changes should be added:

Section 1.06.3 Technical assistance should include that OHCS staff will be the verifiers of training programs that are equivalent to REAP. It should also include that OHCS staff will monitor approved training programs.

Section 1.06.4 Contract training should extend the (may) possibility for OHCS to contract with OECA or "equivalent" certification programs.

In addition:

DOE is "encouraging training to be done with the new standardized WAPTAC curriculum". This language is in the current ARRA WAP Training Centers and Programs grant application. The state plan should reflect the DOE encouragement. It could save OHCS some time and aggravation in focusing on the training issues.

The strength of the REAP plan lies in the personal regionalized training and the certification of both the trainees and the trainers. The weakness is the curriculum. It is just building science built up with Oregon's weatherization specs and an over the counter textbook. Truth is, the waptac curriculum is contemporary, much more complete, appealing and can also be built up with the Oregon weatherization specs and over the counter text books.

If language in the State DOE plan encouraged using the WAPTAC curriculum OHCS wouldn't have to use their time approving texts and curriculum. OHCS could then focus the equivocation process on the certification requirements of alternative training programs. I think this would help maintain the high standard of weatherization professionals we have come to expect in this state while increasing the training capacity.

Respectfully

Steve Jole
CSC Weatherization Supervisor

From: Joan Cote [cotej@mwvcaa.org]
Sent: Saturday, January 16, 2010 11:49 AM
To: Tim Zimmer
Cc: Teresa Cox
Subject: DOE STATE PLAN

Dear Tim:

Mid-Willamette Valley Community Action Agency Inc., appreciates the opportunity to comment on the DOE State Plan for 2010.

- We appreciate the average unit expenditure increase from \$3055 to \$6500 as well as the additional \$188 increase to average if renewable applications are installed.
- MWVCAA supports OECA as the primary training provider for the Oregon Weatherization Assistance Program. MWVCAA also supports the REAP Certification Program as the recognized Weatherization Assistance Program training curriculum and encourages OHCS to continue its partnership with OECA to provide REAP certification for all its weatherization subgrantees.

Thank you.

Joan E. Cote, CCAP

Mid-Willamette Valley Community Action Agency, Inc.
Energy Services Program Director
2585 State Street
Salem, OR 97301
503-585-8491 Ext. 315



NeighborImpact

Critical Needs. Diverse Services. Empowering Change.

January 14, 2010

Tim Zimmer, Oregon WAP Coordinator
Oregon Housing and Community Services
725 Summer Street NE, Suite B
Salem, Oregon 97301

RE: Oregon Weatherization State Plan 2010-11 for U.S. DOE

Mr. Zimmer,

NeighborImpact appreciates the opportunity to review and make comments to the draft Weatherization State plan. Please note our pleasure with the extended review period. Our comments are as follows:

Section 1.02, page 3, Subgrantees – please update NeighborImpact contact information, phone number for Colleen Neel is 541-316-2039/fax 541-504-3373

Section 1.05.2, page 11, Peer Exchange Funds – is the \$1,000 per agency for Peer Exchange set aside on agency Notice of Allocations (NOAs) or are they embedded in the T&TA or Program funding and agencies are allowed to use up to \$1,000 for these activities? Clarification is requested.

1.06.2, page 13 – Availability of T&TA funds – identifies planned trainings such as “Energy Outwest and REAP or *equivalent certification programs*” are eligible activities. Who decides what is equivalent to REAP certification? Our staff and contractors have benefitted from exposure to and participation in REAP certification courses and have stated their superiority to other training programs on the market. If REAP is a proven certification and readily available, what is the benefit to duplicating this training program? Courses have not been filled to capacity; there have not been issues with people being denied training and evaluations have been favorable. We agree that conferences are typically offered once a year and have different content and workshops each year, but what is vital in certification programs is consistency. The agencies have enjoyed consistent training for the past several years and this has provided a clear benefit statewide. As the Training and Technical Assistance Chairperson, I’m unclear as to what is equivalent to REAP certification. Who would be tasked with evaluating other certification programs as equivalent to REAP? Is there time to do this considering the workload at the state and local levels with the increase in ARRA funding? NeighborImpact does not support additional training programs without more specific information. This may adversely affect the quality of training to agencies and contractors.

1.08.2, page 16, ACE Membership – request this list be updated; some members have retired, some names have changed.

End of comments

2303 SW First Street • Redmond, Oregon 97756 • (541) 548-2380
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www.neighborimpact.org



Helping families in need stay warm and safe

January 15, 2010

Tim Zimmer
Oregon Housing & Community Services
North Mall Office Building
725 Summer Street NE, Suite B
Salem, OR 97301-1266

Dear Mr. Zimmer:

The Oregon Energy Coordinators Association (OECA) submits the following in response to your request for comments regarding *Oregon Weatherization State Plan 2010-11 for U.S. DOE*.

General Comment

OECA suggests that future drafts for review have all proposed changes highlighted for ease of review.

State Plan Sections 1.06, 2.20.1

OECA strongly supports the continued requirement that weatherization workers be trained and certified under the Residential Energy Analyst Program® (REAP®). We support these requirements because the REAP® program is an established program recognized for its rigorous training and high standards that have been continually developed over years by highly qualified personnel. It has a high level of credibility across the state and is recognized as among the best in the nation. The REAP® program developed a state-wide network of trainers who maintain a high level of expertise by also working in the field and has established an infrastructure that supports training delivery across the state. There is a major emphasis on hands-on training in the field on real houses previously identified by REAP®-certified auditors as needing weatherization. Most critical of all, the REAP® program makes health and safety of the occupants and workers a priority. All work is focused on their well being, an approach born of the low income weatherization programs.

OECA desires to ensure that equivalent certification programs follow the same rigorous standards as the current REAP® training; anything less could reflect badly on the state. The state could be inundated with programs created solely to take advantage of the influx of ARRA dollars that will not be sustainable when those dollars are expended. There is no benefit to duplicating services and the resultant administrative efforts could put a strain on state resources to monitor more than one program; now is not the time to experiment with untested programs.



Two new REAP® certification programs allow other organizations to provide training while ensuring the rigorous standards are maintained. We feel these new programs will meet the need for equivalent certification programs. First, the REAP® Weatherization Training Facility Certification Program sanctions third-party weatherization training facilities including union training centers to present REAP® training. Second, the REAP® Academic Certification Program assists college and apprenticeship programs in developing weatherization curricula and allows them to conduct REAP® training. Both programs require that REAP® curriculum is followed and that all standards are followed, including maintaining trained and certified staff.

OECA suggests that the mechanism to determine program equivalency include review by a panel made up of representatives of Oregon's energy network who are or have been involved in developing the current standards. This will be consistent with past practices.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Dawson", with a long horizontal line extending to the right.

Jim Dawson
Program Manager



January 13, 2010

Tim Zimmer
Oregon Housing & Community Services
North Mall Office Building
725 Summer Street NE, Suite B
Salem, OR 97301-1266

RE: Oregon Weatherization State Plan 2010-11 for U.S. DOE

Dear Mr. Zimmer,

I am writing in reference to the above mentioned state plan to express my opinion as to the future expectations of the plan with regard to training requirements for workers and home energy auditors.

As a weatherization contractor of thirty-five years serving both Oregon and Washington, my company has worked with a variety of programs with expectations that are all over the board. Some training curriculums offer crash course certifications, but typically graduates hit the field with no real understanding of the complexities of weatherization applications as they apply to the various types of housing stock. With such limited training, graduates are usually unable to solve the unique problems that each home presents. My company then has to perform work using audits that are incomplete or inaccurate.

We have found that the programs with the highest standards of work have historically been those that offer superior training and unwavering expectations of performance. The low income program through OHCS offers both. That, in part, is due to the training curriculum provided through OECA. I have many workers and managers who have participated in OECA, and BPI trainings. I believe that the OECA curriculum offers a much more comprehensive program for students than other curriculums like BPI, especially in air diagnostics. Their modular curriculum allows students to focus on specific technical knowledge in the classroom, and requires field performance hours that allow students to execute the elements properly in the field. The OECA curriculum establishes the minimum requirements that OHCS should allow within the state plan.

I do have two recommendations as alternatives to the existing training plan requirements. 1) Allow proof of "field time previously served" to be an acceptable alternative for students participating in the OECA curriculum. 2) Allow a state registered apprenticeship program that allows the OECA classroom curriculum to be combined with 4000 registered apprenticeship hours. Registered hours would need to be through a registered training agent (employer) who has demonstrated the ability to offer weatherization work hours to employees in all of the various fields of expertise. This allows workers and instructors an option to the full week training sessions that usually consume their work week.

I know that OHCS is challenged to provide the highest standards of performance. In Washington State, we are trying to raise the minimum training standard from the level BPI establishes. It would seem counterproductive for Oregon to reduce its' standard by allowing a lesser alternative to OECA. Although an alternative may be necessary, designing it should be done very carefully with a emphasis on maintaining the standard.

Respectfully submitted

Mike Richart, Sec.
Richart Family, Inc.



January 15, 2010

Tim Zimmer
Weatherization Statewide Program Coordinator
Oregon Housing and Community Services
P.O. Box 14508
Salem, Oregon 97309-0409

Re: State of Oregon – Weatherization Assistance Plan for the US-DOE

It is YCAP's expectation that comments received on this Plan will be reviewed and seriously considered for potential changes to the Plan document as per the intent of a public comment requirement.

YCAP recommends the following general comments in reference to the US-DOE State Plan:

- That OHCS reproduce all written and oral comments received on this Plan and include them in the final response back to the sub-grantees.
- That OHCS consider holding work sessions prior to or post OECA Quarterly meetings with only subgrantees present to work out program specific concerns. This would provide the network the opportunity to evaluate on an annual basis State Plan Development, regulations, delivery and performance of weatherization services. (Similar to Energy Assistance Programs)
- That reference to LIEAP throughout the DOE State Plan is changed to LIHEAP "Low Income Home Energy Assistance Program." This will provide consistent terminology with the Federal Grant Application filed under the Energy Assistance component.

Please accept the following comments as additional written testimony in response to the Oregon DOE Weatherization Assistance Plan:

Section 1.06 Training and Technical Assistance, page 12 -13

Comment: YCAP has been a strong supporter of training and technical assistance by providing staff time, resources to OECA, and peer exchange across the state. YCAP supports allocations to sub-grantees to allow flexibility to accomplishing local Training and Technical Assistance needs.

Section 1.06.2 Training and Technical Assistance, page 13

Comment: YCAP recommends further clarification with this section. The following statement “OHCS will hold back (not allocate all available T&TA Training funds) and use T&TA Training funds to pay for subgrantees to attend trainings, conferences and workshops as prescribed within the T&TA Plan” leaves the perception local control may not exist with the subgrantees.

Section 1.08.2 DOE Funds as Leverage, page 15 “DOE funding must be utilized in every unit completion”

Comment: YCAP recommends the following change: DOE funding expended on projects is strongly encouraged. The following items have been provided for OHCS to consider:

1. DOE resources provided to agencies are limited and in some cases expended prior to the end of the 12-month grant period not permitting the use of DOE on every project.
2. Local flexibility should be granted to subgrantees to determine the best funding options for each project.
3. Although ARRA is not identified in the funding resources in this section when combined on DOE projects, it will become “a finding” in a compliance review.

Section 1.08 Policy Advisory Council, page 15

Comment: YCAP commends both past and current members serving in this capacity for their efforts to serve those persons less fortunate in the State of Oregon. As a non-member agency of this council, it would be very helpful to have information (i.e. agenda, minutes, list of updated members) prior to meeting. (Repeated Comment - DOE 2005-06, DOE 2007-08, DOE 2008-09, State Plan)

Section 2.01.3, Time Period for Income Verification page 20 – YCAP recommends that OHCS further clarify the sections utilizing the word “must.”

Section 2.04 Energy Audit Procedure, page 23 – states “OASIS will be the preferred computerized audit tool for use in the Weatherization Assistance Program in Oregon once approved by DOE. All subgrantees will use OASIS and only OASIS on each job.”

Comment: YCAP encourages improvements to the process available to determine priority cost-effectiveness but neither supports nor objects to OASIS without having seen, used, or tested this program. The statement also refers to “preferred” in one sentence then stipulates in the following “will use and only use OASIS.” It is our opinion that the use of “preferred and will” contradict each other leaving some room for misinterpretation. In addition, it is YCAP’s recommendation that OHCS continue to support REM/Rate beyond the approval of OASIS to allow subgrantee to leverage outside funding opportunities (i.e. Northwest Natural Gas Projects that require REM/Rate as the modeling software).

Section 2.12.6 Special Populations, page 28

Comment: YCAP supports OHCS's effort to include, support, and promote weatherization among Oregon's tribal communities. The establishment of weatherization programs within the tribal systems is allowing the tribes to strengthen their core services to tribal members in an effective manner. YCAP recommends that the options identified under this section be reviewed and discussed with the Energy Network.

Section 2.20.1 Labor, page 37

Comment: YCAP supports the certification requirements and standards that are required of agency staff through the REAP Certification Process. It continues to be the industry standard utilized by the Oregon's Low-Income Weatherization Assistance Program. It's YCAP's experience that REAP curriculum places strong focus on health and safety, testing protocols, and hands on applications that are unique to delivery of this program. Currently, there is deep concern that no established system is in place to evaluate equivalency and/or monitor continued compliance. If equivalent status is granted, YCAP recommends OHCS establish a curriculum Review Board that may include, but not be limited to, various members from the Oregon Energy Network, Utility Partners, ODOE, BPA and OHCS.

Section 2.20.2 Davis-Bacon Act Compliance, page 37-38

Comment: YCAP supports the US-DOE exemption for weatherization activities under ORS 137-30-015(3)(a) in the DOE Low-Income Weatherization Program.

The efforts of OHCS staff for providing the opportunity for program enhancement that serves the disadvantaged individuals of the State of Oregon is greatly appreciated.

If you would like further clarification of the comments, please feel free to contact me at 503-883-4174.

Respectfully Given,

Signature on file

Kraig Ludwig
Energy Services Director

Cc: Lee Means, YCAP Executive Director

Email – Attachment sent January 15, 2010

January 15, 2010

Mr. Tim Zimmer
Oregon Housing and Community Services
North Mall Office Building
725 Summer Street NE, Suite B
Salem, Oregon 97301-1266

Dear Mr. Zimmer,

Cascade Natural Gas appreciates the opportunity to comment on the draft 2010-11 U.S. DOE Oregon Weatherization State Plan.

Section 1.07 Leveraging Activities

1.07.1 Other Funds: Cascade Natural Gas operates a low-income weatherization program that is designed to provide supplemental leverage funds to subgrantees to help stretch their available weatherization resources in a manner that enables more low-income homes to receive weatherization services. While Cascade's weatherization funding is not directly administered by OHCS we believe it is important for the Agency to recognize our program as providing a valuable source of "Other Funds" that are compiled and reported to DOE and other entities.

1.07.02 DOE Funds as Leverage: Cascade Natural Gas believes that the statement "*Historically, DOE funds have not been used to create leverage opportunities.*" while precise, misses an opportunity to highlight past successes. **Section 1.7: Leveraging and Leveraged Resources** of the DOE-WAP Program Year 2009 Weatherization Grant Guidance allows the pursuit of leveraging activities which may supplement the program or be used to run a parallel program with the intent of producing more than one dollar of leveraged funds for each DOE dollar expended. In Oregon, such leveraging opportunities already exist in the form of utility programs that subgrantees have available to draw upon. Cascade Natural Gas believes that to better utilize these resources, OHCS should move beyond "encouraging" subgrantees to utilize these funds and become more active in helping to ensure that they are in fact utilized. Additionally, Cascade notes that the CNG Oregon Low-Income Energy Conservation Program should be added to the list of available weatherization leveraging programs along with NW Natural (OLIEE), BPA, SHOW, REACH, Idaho Power, and AVISTA.

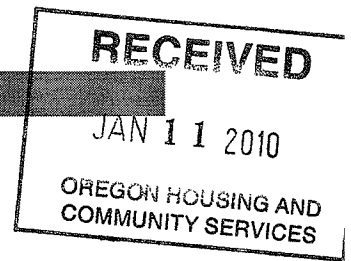
Thank you,

Jim Abrahamson
Low Income Conservation Administrator
Cascade Natural Gas
2004 SE Clatsop St.
Portland, Oregon 97202
503-230-9607
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COMMUNITY SERVICES CONSORTIUM

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January 8, 2010

Tim Zimmer
Oregon Housing and Community Services
725 Summer St. NE, Suite B
Salem, OR 97301-1266

RE: Comment on 2010 US DOE State Plan

Dear Tim:

Thanks for giving us an opportunity to comment on the 2010 US DOE State Plan. I have worked with the weatherization program for the last 28 years and have seen a lot of changes throughout that time period. The last year or two seems as if there have been additional significant changes. A lot of these changes are very technical in nature, requiring staff training to learn, understand and implement. I find it to be very beneficial to outcomes for the program.

My comment is that I would like to see weatherization programs be able to use training dollars to cover salary and fringe costs of staff attending training sessions. There are sufficient funds available to include these costs in our T/TA budget. An added benefit would be that these non-construction costs would not be added to the cost of individual weatherization jobs thereby improving the savings to investment ratio. Programs that do not have crews may have the option of providing a stipend to attendees who otherwise would not be paid for such time away from a worksite and may prevent their attendance. This could result in more and better trained contractors and their employees working with the weatherization program.

Sincerely,

Thomas A. Hatley
Housing Director

Corvallis, 545 SW 2nd St., Suite A, 541-752-1010

Lebanon, 41 W. Maple St., 541-451-1071

Newport, 120 NE Avery, 541-265-8505

Lincoln City, 2130 SE Lee St., 541-996-3028

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Albany, 250 SW Broadalbin, Suite A, 541-928-6335

Lebanon, 44 Industrial Way, Suite C, 541-259-5830

Toledo, 845 A St, 541-336-5113