



Yamhill Community Action Partnership

January 18, 2008

Dan Elliott
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 as 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 Plan document.
- That OHCS consider holding work sessions prior to or post OECA Quarterly meetings with only sub-grantee's present to work out program specific concerns. This would provide the network the opportunity to evaluate on an annual basis (similar to Energy Assistance Programs) the regulations, delivery and performance of weatherization services.

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

Page 14: 1.06.3 Technical Assistance

Comment: YCAP supports the use of T/TA funds to assist OHCS staff in the delivery of technical assistance on DOE related matters to all weatherization programs. In addition, this agency supports OHCS in the hire of a full-time T/TA staff person for the purpose of monitoring, partnering and providing Technical Assistance. YCAP recognizes that each member agency is an independent organization facing unique local conditions that may affect program delivery. The presence of a T/TA staff person at the state level should be a tremendous asset to all. YCAP recommends that participation with OECA and related network activities continue to be a high priority for this position to ensure that partnership in the quality services provided throughout the state of Oregon continues at its highest level.

Page 19: 2.01. – 2.01.3 What Is Income, What Is Not Income & Time Period for Income Verification

Comment: After review of this section, YCAP recommends that an annual review be completed to provide consistent eligibility criteria with Energy Assistance-LIEAP standards.

YCAP's mission is to advocate for and assist persons toward self-sufficiency.

Page 15: 1.08.1 Policy Advisory Council

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) prior to meetings and meeting minutes. (Repeated Comment - DOE 2005-06, DOE 2006-07 State Plan)

Page 22: 2.04 Energy Audit Procedure

References the allowance for Sub grantees to request a waiver to the two Rem/Rate Certification requirement

Comment: YCAP supports the allowance for smaller agencies to request a waiver to this requirement, but it is not clear if the waiver must be submitted on an annual basis. Rather than an annual requirement, this agency recommends that waivers cover a greater period of time (i.e. 3 or 5 years) or cover the CRD grant cycle. (Repeated/Revised Comment - DOE 2005-06, DOE 2006-07 State Plan)

Page 30: 2.12.6 Special Populations

Allocation of weatherization funds to sub grantees will correspond to the following formula:

Comment: YCAP recommends that OHCS consider other avenues for the allocation of Native American Funds. This agency does not believe the current system provides adequate opportunity for agencies to collaborate with their local partners by allowing one or two agencies to receive 100% of the special population funding. The current system is burdensome. It requires agencies to spend time and funds from other grants to identify projects without any guarantee that funds will be awarded. YCAP continues to partner with The Confederated Tribe of Grand Ronde without DOE or other Native American Funds for projects identified throughout the year. It is critical for agencies developing their partnerships with the Tribe to have a set allocation to work with for projects that may arise without prior knowledge. If the agency does not obligate or expend the funds after the first 6 months, then those funds should be considered for special projects that should be received by a deadline. The geographic service territory of the Native American Tribes is not consistent throughout the state, therefore, projects submitted should not be considered as duplicates or reviewed as one size fits all. (Repeated/Revised Comment - DOE 2005-06, DOE 2006-2007 State Plan)

Page 35: 2.20.1 Labor

Comment: YCAP supports the certification requirements and standards that are required of agency staff through the REAP Certification Process. It is our recommendation to raise minimum standards for an Auditor to successfully complete the Diagnostic Tech. course or equivalency to become an Energy Analyst.

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 Coordinator