

Comments for the 2023-2024 State Plan

Page in State Plan	Original Language	Reason	Changed to:	Page in Revised State Plan
	<p><u>Received from Energyinfo website June 8, 2023</u></p> <p>Lesley Baulding, Everblue (800) 460-2575, lesley@goeverblue.com www.goeverblue.com Innovation, Technology & Training</p> <p>Hi there,</p> <p>I just submitted the following message through the DEQ Website User Experience Survey, but I believe the content is more than just a website update.</p> <p>I was reading the 2023-2024 Weatherization Assistance Program State Plan and saw the information about subgrantees having to complete Building Analyst, Energy Auditor, and/or QCI certifications to participate. Yet under the Outreach & Training section, the recommended resource (Energy Efficiency Arkansas) does not appear to offer these trainings. I'm writing on behalf of Everblue (https://everbluetraining.com/), an IREC Accredited BPI Test Center that offers online and in-person trainings for Building Analyst, Energy Auditor, and QCI. In fact, as of June 1, BPI no longer offers the "Building Analyst" exams anymore, too. Instead, they have split Building Analyst into 2 micro-credentials called Building Analyst Technician and Building Analyst Professional. Everblue offers these programs as well. All this to say, I'd like to submit our company as an additional resource for Outreach & Training, listed here: https://www.adeg.state.ar.us/energy/.</p> <p>Out of curiosity, do you know if the text regarding Building Analyst will be updated on the 2023-2024 State Plan to address the newer credentials? When subgrantees and contractors contact us about what they need to participate in the state WAP program, it would be great to be on the same page with the state as far as advising them on which course/certification to pursue. Thanks in advance for your assistance.</p>		<p>Training resources have been reviewed and approved by investor owned utilities who fund Energy Efficiency Arkansas which is sunsetting at the end of calendar Year 2023.</p> <p>Yes. Information about Building Analyst has been updated. See pp 81 and 83.</p>	

<p><u>Received from Energyinfo website June 13, 2023</u> Kathy {Kat} Allen, Weatherization Director, C-SCDC 1617 South Zero, Fort Smith, AR.72918 {479} 785-2303 ext.123 KAllen@cscdcca.org</p> <p><u>Admin</u></p> <p>The PY 2023 State Plan shows that while each subgrantee’s total DOE Grant budget amount went up, the subgrantees’ administration share went from approx. 70% to 50%. For CSCDC, this is a decrease of approximately \$14,000 from PY2022 to PY2023.</p> <p>Costs that are required to be allocated to admin like utilities and office supplies to create client folders are required by DOE are increasing. Meanwhile, the state plan shows that the state has determined to reduce administration dollars for each agency. This creates hardship for our agency to continue to pay admin salary, fringe, electricity, water, maintenance, client file materials, procurement costs, internet, and phone that are all necessary and required to comply with the requirements of our weatherization grants.</p> <p>For a community action agency like ours, \$14k is a huge cut to our administration costs, which increase year by year. This means that the overall loss of administration funds has a greater impact than the actual \$14k loss as that \$14k will not cover as large a percentage of the administration costs in PY2023 as it did in PY2022. The weatherization program must pay a share of agency costs, and this cut will necessitate a drastic cut in spending agency-wide, which could ultimately cost someone their job. This would in turn reduce the number of homes that the agency has the capacity to weatherize in a program year.</p> <p>Due to these concerns, CSCDC reached out when we first started discussing our State plan and we asked if there are more funds available for Admin. We were told there might be funds available and we have not heard back from anyone.</p> <p>Having ignored our concerns, the state office for weatherization has dramatically increased their portion of administration funds. In PY2022, the</p>			<p>All subgrantees will have access to three (3) grants:</p> <ol style="list-style-type: none"> 1. DOE annual formula/block grant 2. LIHEAP annual formula/block grant 3. DOE infrastructure award <p>All administrative expenses must be cost allocated among all grants 2 CFR 200.413.</p> <p>Combined, all three (3) grants will provide more administrative funds than available in recent years.</p>	
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<p>state took just under 30% of the total administration budget for the state. The state plan has the state office taking 50% of the allocation. In PY2022, the state took \$115,785.00 for admin, and the PY2023 state plan shows the state allocation at \$202,230.00, and increase of \$86,445 or a 74% increase.</p> <p>The state should not put the individual weatherization providers in a position where they are unable to provide for cost increases for utilities while the state takes a large increase with no explanation. Surely, the state's cost to administer the program did not rise by \$86,445 as the state weatherization office has seen significant turnover as evidenced by the staff list included with each state plan. The state's staff for weatherization is mostly inexperienced and relatively new to their positions, so there is no reason for the cost of maintaining that staff to increase more significantly than the subgrantee's administration costs.</p> <p>The state has provided no explanation as to the reason for this change, has ignored concerns from the subgrantees, and is moving forward with a state plan that will have a measurable and immediate negative impact on the subgrantees. Can the state show that this change will have a measurable and positive impact for the state, and at what timeline will this take place? Furthermore, if any such positive impact exists, can the state show that their positive impact will negate the negative impact on the subgrantees?</p> <p><u>Health & Safety</u> Also included in the state plan on page 23 is this statement: "Arkansas expects that H&S expenditures will average \$1,521.72 per unit, or 21% of the average cost per unit (\$7,246.31)."</p> <p>Please provide further explanation on the meaning and impact of this statement. Does the state mean that while DOE allows 24.99% for H&S, that the state of Arkansas will be holding its subgrantees to 21%?</p> <p>In the past, the state office has reported on the monthly director's calls that the state was close to or exceeding their allowed percentage of 24.99%, so why would the state plan include a statement that further restricts the subgrantee's ability to meet expectations?</p>		<p>The budget has been changed so that the amount for Health & Safety is 24.99 percent of Program Operations. See p. 24.</p>	
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<p>Received from Energyinfo website June 14, 2023</p> <p>Joe Mansfield Director of Weatherization Crowley's Ridge Development Council 870-333-5127 From: Joe Mansfield <joemansfield@crdcnea.com> Sent: Wednesday, June 14, 2023 10:01 AM</p> <p>Executive Summary, page 3: <i>"Funds are directed toward the most cost-effective energy efficiency measures, as determined by an on site, highly technical energy audit of the eligible building."</i> Is ECOS being updated to perform in this manner? Currently, ECOS does not and has not produced a work order that listed tasks in SIR priority (highest to lowest).</p> <p>Determining Building Eligibility, page 9: To determine if a home has been previously weatherized, we are instructed to <i>"search the older data base"</i>. Subgrantees that have acquired counties from other agencies do not have access to the above-mentioned databases. Does the State have these records?</p> <p>Mgmt. of WRF Page 15; <i>"it is permissible to braid DOE and LIHEAP funds with other sources..."</i> Is it permissible to braid DOE with LIHEAP as stated in an email from the State WAP Manager dated March 27,2023? This is not mentioned in the State Plan.</p> <p>Priorities, page 16: Priority points have not calculated correctly in ECOS for several years. Will this be addressed and corrected in the new grant year?</p>		<p>This issue has been communicated to ECOS software contractor. It is expected to be addressed in Q 1 (July-Sept 2023).</p> <p>The state (AEO) does not have any records prior to 2015. Some WAP providers have older databases or paper files which are options for searching for previously weatherized homes. If not available to a subgrantee, then the subgrantee is not required to search old records. Any home weatherized before July 1, 2008 is eligible to be re-weatherized in this program year. See p. 8.</p> <p>It is permissible to braid DOE WRF funds with LIHEAP WRF funds. This statement has been added to the State Plan. To “braid” means to use different funding sources on the same job. State Plan has been updated.</p> <p>The calculation of priority points in ECOS will be addressed with the ECOS software provider in Q 1 (July-September 2023).</p>	
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<p><u>Received from Energyinfo website June 14, 2023</u> <i>Beverly Palmer</i> <i>CADC Weatherization</i> bpalmer@cadc.com 501-776-8446 Fax: 501-326-6335</p> <p>P. 24 V.8.2 Administrative Expenditure Limits For PY 2023, the state/AEO has budgeted half of the total allocation for Administration, or 7.5 % Subgrantee administration is half of the total allocation for Administration, or 7.5%</p> <p>Why was administration reduced from 10% to 7.5%?</p> <p>Approval of additional administrative costs is based on each subgrantee’s total grant being less than \$350,000 and the subgrantee having a cost allocation plan for overall agency administration. The subgrantee who had the option to request additional administrative funds this year did not do so.</p> <p>Was is necessary for the subgrantee to make a request for the additional administrative funds? And was that subgrantee aware of this? CFR 10 Part 440.18 (e) says state may provide the additional administrative funds.</p> <p>p. 10 Rental Units/Multi-family Multi-family weatherization has consistently represented less than twenty percent (20%) of total weatherization production in Arkansas. <i>In PY 2021, there was no weatherization of buildings with five (5) or more units.</i> Why was PY 2021 even mentioned here. Should information be for PY 2022?</p> <p>p. 14 Weatherization Readiness Fund (WRD) Plan To be eligible for WRD services, a home must:</p> <ul style="list-style-type: none"> • Be eligible and currently waiting for <u>or undergoing Weatherization services</u>. So can a home currently being weatherized also have WRF funds used for repairs? Or does it first have to be deferred? 	<p>AEO chose to split the allocation for Administration equally with Weatherization subgrantees, which is allowable by DOE. (See response on Page 2 for further information.)</p> <p>Yes, necessary notice is transmitted with subgrantee allocations every year.</p> <p>The information is for PY2022 but the year was mistakenly written PY2021. The year has been corrected. See p. 10.</p> <p>If repairs that are beyond the scope of Weatherization are discovered during Weatherization, usually during the Energy Audit but occasionally when work has begun, the home must technically be deferred to justify the use of WRF for repairs. Once completed, Weatherization can be continued.</p>
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	<ul style="list-style-type: none"> Be weatherized using the same funding source used for WRF. If DOE and LIHEAP WRF are braided, which funds are then used for weatherization (DOE or LiHeap? Do the weatherization cost also need to be braided? 		<p>Yes, for homes where both DOE and LHEAP Funds are used for repairs (WRF), Weatherization costs should also be assigned to DOE and LIHEAP.</p>	
	<p>Comments during the public hearing.</p>			
	<p>Beverly Palmer Will there be written responses?</p> <p>Caleb Fischer Administrative Expenditure Limits, page 24 has AEO getting 7.5% but 10CFR 440.18 says no more than 5% used by Grantee?</p>		<p>Yes. The Arkansas Energy Office will consider each comment made, will review each comment made, and will post a response to the comments. And that location for the comment responses will be the same location as the state plan was advertised and posted.</p> <p>The DOE allows half of the Administrative allocation to be spent by the Grantee and half by the subgrantee. This year’s grant award (July 1, 2023-June 30, 2024) has a 15% Administrative share where the previous Administrative Share was 10%. Therefore, the Grantee, AEO, is allowed 7.5% Administration. See footnote 3 on Page 25 of the State Plan.</p>	