

Weatherization Comments to State Plan 2016-2017

Comment	Location in Plan	Comments	Agency Requesting Review	State Response	Statute/ Regulation
1		I think clients who have applied for services and do not have any or one priority point will be on the list for an indefinite amount of time. Knowing this is a DOE guideline, it may take pressure from a national organization or political pressure to get it changed	Mark Whitmer, CSCDC	Weatherization Program requirements in 10 CFR 440 state that “Priority is given to identifying and providing weatherization assistance to: (1) Elderly persons, (2) Persons with disabilities, (3) Families with children, (4) High residential energy users, and (5) Households with a high energy burden.”	10CFR440.16(b)
2	Page 22	Rental Units: Providing weatherization services to a vacant unit even with assurances from the owner it will be occupied by a low-income family within 180 days is a long shot. Most owners will tell you what you need to hear to receive the services. It will be up to the subgrantee to do all follow ups to see if the unit has been occupied. If the unit remains vacant or is not occupied by a low-income family the subgrantee has nothing to be used as leverage to recoup the funds spent on the unit. I encourage AEO to remove this from the state plan. Understanding it may be a DOE guideline, I would encourage DOE to take a look at removing it or providing guidance on recouping any funds spent on the unit.	Mark Whitmer, CSCDC	Arkansas will change the plan to read: “Units being weatherized must be occupied by a qualified household; the only exception to this requirement is that an applicant household may temporarily move out while work is being performed on the house, if the temporary nature of the move is documented and re-occupation of the house is expected once work is completed.”	
3	Page 8	Priorities for Service: C-SCDC has the concern for the people who might be waiting for an indefinite time to be provided services. It is understood that the DOE point system must be followed. However, with this new point system, some people who need the services may not ever receive them. It just seems a point system that would include persons with no priorities could be designed by DOE to include these people and still focus on the priorities.	Debbie Biggs, CSCDC	Note that “Persons with equal number of points or no points will be served based on application date, with the person waiting the longest being served first.” This provision of the plan does give priority to those waiting the longest on the list, after DOE priorities are considered. In addition, please see response to Comment 1.	
4	Page 21	Rental Units: No undue or excessive enhancement shall occur to the value of the dwelling units. CSCDC would like to request clarification on what is determined to be an excessive enhancement. It is very important that this be made clear to the subgrantees so as not to have any disallowed costs. Depending on what the definition may be, does this suggest that regardless of what the energy audit may call for because a particular measure may be deemed efficient, we cannot install that measure if it falls into the definition of excessive enhancement?	Debbie Biggs, CSCDC	To clarify the meaning of “no undue or excessive enhancement,” Arkansas will add the following to the state plan: “An energy audit of a rental unit will be reviewed to determine if work authorized by the audit software is more costly than the average cost per unit (ACPU) for the agency providing the weatherization services. If the cost of work on the rental unit exceeds the agency’s ACPU, agency will negotiate with the property owner to pay all or part of the cost exceeding the ACPU prior to any work being done on the unit. If the owner’s household income is 200% of poverty level or less, then the rental unit may be weatherized without owner/landlord contribution.	
5	Page 22	Rental Units: In the case of a vacant rental dwelling, weatherization assistance may be provided if there is assurance that a low-income household will inhabit the dwelling within 180 days of the date the weatherization service was completed. CSCDC has concerns with this rule unless it specifically applies to low-income multi-family projects. For single family units we do not see how it would be possible to do this.	Debbie Biggs, CSCDC	Please see response to Comment 2.	

		You have no client to be able to qualify, even though you have the option of making an agreement with the landlord to rent to low-income persons, you have no way of keeping up with what may be done with the property, and the programs do not have the time to try and follow situations such as this. As well, with no client to qualify, how are we going to know if they have any priorities? This could be opening a door for potential problems with single family units. The dollars would be better spent on clients that we know are qualified and need our services.			
6	Page 7	Selection of BCD for the counties of Lee, Monroe, Phillips and Prairie. Question: If the RFQ for that subgrantee included single-family weatherization or only multi-family weatherization?	Beverly Palmer, CADC	The RFQ issued by AEO in the Spring of 2015 was for both single family and multi-family weatherization. Better Community Development (BCD) was selected as a qualified single-family weatherization provider but did not receive single family funds at that time because another responder received more points.	
7	Page 15	Cost per unit. If DOE is raising the cost per unit to more than \$7,000, why is Arkansas limiting the cost to \$4,736 when more is being expected of agencies and contractors? This also limits the H&S per unit. Average cost per unit for 2016-16 is \$6,000.	Beverly Palmer, CADC	The average cost per unit (ACPU) is based on the number of homes an agency is expected to weatherize with the allocation of funds it receives. This determination is based on past experience. For the current program year to date, Arkansas has an ACPU of \$4,500; experience has been that Arkansas is able to weatherize more homes than originally planned at the beginning of each program year. This information informs the projection of units for the next program year covered by this plan. Health & Safety (H&S) expenditures per unit are not limited if all H&S measures are allowable and justified for the particular house being weatherized. For the current program year to date, Arkansas is spending 19.3% of ACPU on H&S and will request approval from DOE for this level of expenditures.	
8	Page 19(3)	Clarification needed. If client presently has income over 200%, but did qualify for LIHEAP Assistance sometime during the preceding twelve month period, are they eligible?	Beverly Palmer, CADC	No. The Arkansas LIHEAP program is using 60% of the median income in Arkansas as an upper limit to qualify for that program. Therefore, Weatherization cannot use that income determination to approve client eligibility for Weatherization but can use documentation of income obtained by LIHEAP in making eligibility determination for Weatherization.	
9	Page 21	Rental Units-Third bullet. What is definition of undue or excessive enhancements.	Beverly Palmer, CADC	Please see response to Comment 4.	
10	Page 24, 2 nd Paragraph	Seems to conflict. May not work exclusively in one county for more than one month. But client with highest points overall should be worked before other counties with top clients having fewer points.	Beverly Palmer, CADC	Wording will be added, as follows, to replace "Client with highest points overall should be worked before other counties with top clients having fewer point": The selection of a county in which to provide weatherization work exclusively for a coming month should be based on where the applicant with the highest number of points among all counties resides.	
11	Page 25	Will there be a Field Guide for mobile homes to be used until the SWS for mobile homes is approved and then change in mid production?	Beverly Palmer, CADC	When DOE approves the use of SWS Guide for Manufactured Housing for use in Arkansas, this new guidance document will apply to mobile homes that are audited after the date of approval.	
12	Page 37	Educational materials, refers to a calendar with tips to save energy. There has not been funds to purchase educational material such as the calendar mentioned.	Beverly Palmer, CADC	Arkansas allows each Weatherization agency to decide which materials it finds helpful when providing client education. Any reference to specific materials is provided as a suggestion only. Each agency may use T&TA funds to purchase client education materials of its choice. AEO also has various publications at no cost to the agency.	

13	Page 13	CAPCA's fax number is 501-712-4039	Melissa McWilliams, CAPCA	So noted and changed. Thank you for correct information.	
14	Page 16	State Plan. Are dates correct regarding the State Plan?	Melissa McWilliams, CAPCA	This state plan covers DOE program year July 1, 2016 through June 30, 2017. Corrected.	
15	Page 19 Income verification, 3 rd bullet	Is income verification only being required annually now?	Melissa McWilliams, CAPCA	Yes. Income verification is required annually after initial determination of eligibility.	
16	Page 24, last paragraph	Weren't the rules changed where we could no longer pull a house because of leveraging?	Melissa McWilliams, CAPCA	Arkansas can still weatherize a house on the priority waiting list out of order in response to a leveraging opportunity; however, the guidance cited here comes from DOE and provides limits which must be considered prior to weatherizing a home out of order because of a leveraging opportunity.	
17	Page 25	Electronic link sentence isn't complete	Melissa McWilliams, CAPCA	Guidance for finding documents will be changed to: Go to http://arkansasenergy.org/ Click on "Incentives & Programs" on left side of screen Click on "Weatherization Assistance Program (WAP)" Scroll down and select "WAP Forms & Documents" Access all WAP documents available on the Arkansas Energy website.	
18	Page 25	Documentation distribution. Field Guide and Operations Manual are missing dates.	Melissa McWilliams, CAPCA	Deck of Cards references "Standard Work Specifications Field Guide for Single-Family Homes." There is no date for this publication. On the website it is "Field Guide for Single Family Homes. Deck of Cards will be changed in the Plan to its full title "Standard Work Specifications Field Guide for Single-Family Homes." There is no other Field Guide for which there is documentation of distribution. This reference is deleted from the plan. Arkansas Subgrantee Operations Manual has a date of 2014. The Operations Manual on the website has a date of 2015 and contains some revisions; however it is still under revision, so the 2014 Operations Manual referenced in the plan is the latest official version and will be replaced on the website.	
19	Page 32	Training and technical assistance. First paragraph. Should this be continuing in program year 2016?	Melissa McWilliams, CAPCA	Yes. Corrected.	
20	Page 34	Under Tier 2 training, the paragraph. There is an extra "." at the end. Also, we were not awarded CEU's that were eligible for BPI certification, to my knowledge. We were advised that it was being checked into but never received them.	Melissa McWilliams, CAPCA	Typing corrected. AEO will follow up on CEU awards.	

21	Page 35	Subgrantee Monitoring has a 4 after it.	Melissa McWilliams, CAPCA	Typing corrected.	
22	Page 31	In the <i>Quality Control Monitoring</i> section it states... AEO to provide technical assistance with weatherization techniques such as CAZ (combustion area zoning) and air sealing (combustion area zoning)—should read (Combustion Appliance Zone)	Melissa McWilliams, CAPCA	Changed to Combustion Appliance Zone.	
23	Page 36 Paragraph 6	...combustion area zone (CAZ) Should read Combustion Appliance Zone	Melissa McWilliams, CAPCA	Changed to Combustion Appliance Zone.	
24	Page 22	Arkansas requires financial participation from owners when feasible but doesn't allow owner contributions for applicants on the waiting list. Clarification requested.	Brannon Runions, Elevate	See response to Comment 4 for clarification of requirement for financial contribution from property owners that may apply after review of energy audit results. However, property owner may not provide a financial contribution, nor may agency accept a financial contribution, as a way to move the tenant/applicant up on the waiting list.	
25		BCD is a multi-family agency. Did they bid single family homes?	Roger Lutrell/Amy Bryant, PBJCEOC	Please see response to Comment 6.	
26		When comparing the number of homes from 2015 to 2016, why is there a decrease in the number of homes for our counties? Is this because of the 2014 Carry-over? Should it not be the same or more since the amount per house decreased?	Roger Lutrell/Amy Bryant, PBJCEOC	Yes, decrease in number of homes is due to less funding in PY 2016 without carry over funds. Number of units each agency will be expected to complete will be revisited when budget categories are finalized.	