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Date: September 11, 2023

TO: Hearing Attendees and Commenters – OAR chapter 333, division 90, "Healthy Homes Grant Program"

FROM: Brittany Hall, Hearing Officer and Administrative Rules Coordinator

cc: Brett Sherry, Program Manager
Healthy Homes & Schools Unit

SUBJECT: Presiding Hearing Officer's Report on Rulemaking Hearing and Public Comment Period

Hearing Officer Report

Date of Hearing: August 15, 2023, via Zoom

Purpose of Hearing: The purpose of this hearing is to receive testimony regarding the Oregon Health Authority (OHA), Public Health Division's proposed permanent adoption of Oregon Administrative Rules in chapter 333, division 90 in order to implement the Healthy Homes Grant Program. The Oregon Legislature authorized the Oregon Health Authority to implement the Healthy Homes Program in 2021.

The Healthy Homes Grant Program was established during the 2021 Oregon legislative session with the passage of HB 2842. SB 1536, passed in 2022, amended ORS 431A.400 by including an expanded list of eligible entities and activities under the program. The passage of HB 2987 in 2023 removed from statute the limit on administrative expenses and program delivery costs, shifting the responsibility for determining limits on administrative expenses to the Oregon Health Authority to write into administrative rule.

Hearing Officer: Brittany Hall

Testimony Received: No individuals provided oral testimony at the hearing.

Other Comments: One individual or organization submitted written comments to OHA within the period allotted for public comment, which closed at 5:00 PM on August 21, 2023. These comments are briefly summarized as follows:

Mark Wyman, Senior Manager – Innovation and Development, Energy Trust of Oregon

Mark Wyman submitted written comments on behalf of Energy Trust of Oregon. They wrote that the “proposed rulemaking anticipates a diversity of needs and allows for community organizations and beneficiary households to utilize these resources to address the energy and health factors of greatest significance at each residence, which may vary from household to household.” They further wrote that “OHA’s flexible approach supports collaboration between organizations needed to advance the stated objectives to ‘maximize energy efficiency, extend the usable life of residences and to improve the health and safety of the occupants.’ Prioritizing applicants who demonstrate ability to ‘leverage Program funding with other funding, resources or partnerships to increase benefits to low-income households,’ reinforces the need to work cooperatively to achieve the greatest possible benefit on behalf of Oregonians.”

Mark Wyman’s written comments on behalf of Energy Trust of Oregon are attached to this report.

Agency response:

Thank you for your thoughtful comments on the proposed Oregon Administrative Rules for the Healthy Homes Grant Program. Your insights and perspective are valuable as we work to shape a program that best serves the needs of Oregon communities and households. We have carefully reviewed your comments and would like to provide a response addressing the key points you raised.

Your observation that the proposed rulemaking allows for a diverse range of needs to be addressed within the community organizations and beneficiary households is accurate. We recognize the importance of tailoring our approach to address the unique energy and health considerations that vary from one residence to another. This flexibility aligns with our overarching goals of enhancing energy efficiency, extending the lifespan of residences, and ensuring the health and safety of occupants.

Furthermore, your emphasis on collaboration between organizations is noted. We agree that a cooperative approach is essential in achieving the multifaceted objectives of the Healthy Homes Grant Program. By encouraging applicants to leverage our program funding with other resources, partnerships, and funding opportunities, we aim to maximize the positive impact on low-income households across Oregon. Your support for this approach reinforces the idea that collective efforts can result in a greater overall benefit for the community.

Your comments are instrumental in shaping our perspective on the program's design and implementation. As we move forward, we remain committed to fostering collaboration, adaptability, and inclusiveness in our approach. We are grateful for your engagement and dedication to the success of the Healthy Homes Grant Program.

Once again, thank you for taking the time to provide your input. It will contribute significantly to the program's effectiveness and the well-being of Oregonians. If you have any further thoughts or suggestions, please do not hesitate to reach out to us.



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August 15, 2023

OHA, Public Health Division
Brittany Hall, Administrative Rules Coordinator
800 NE Oregon Street, Suite 930
Portland, Oregon 97232

R.E : Notice of Proposed Permanent Rulemaking: OAR chapter 333, division 90 - "Healthy Homes Grant Program

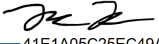
To Whom It May Concern:

Thank you for the opportunity to provide comment on the Proposed Permanent Rulemaking for the Healthy Homes Grant Program. These comments are submitted on behalf of Energy Trust of Oregon.

Energy Trust is an independent nonprofit organization, selected and overseen by the Oregon Public Utility Commission, to lead Oregon utility customers in benefiting from energy efficiency and renewable power. Our services, cash incentives and solutions have helped participating customers of Portland General Electric, Pacific Power, NW Natural, Cascade Natural Gas and Avista save more than \$5.3 billion on their energy bills since 2002. The cumulative impact of our leadership since 2002 has been a contributing factor in our region's low energy costs and in building a sustainable energy future. More information about Energy Trust's background, funding sources, strategic and action plans, policies and programs are available on our website at www.energytrust.org/about.

Energy Trust staff participated as a governor-appointed member of the Interagency Task Force on Healthy Homes facilitated by Oregon Health Authority (OHA). Through our energy-focused work we have learned about coinciding health benefits of energy efficiency improvements, and the opportunity to provide deeper levels of service to clients with non-energy measures that address a range of environmental risk factors in the built environment. OHA's proposed rulemaking anticipates a diversity of needs and allows for community organizations and beneficiary households to utilize these resources to address the energy and health factors of greatest significance at each residence, which may vary from household to household. OHA's flexible approach supports collaboration between organizations needed to advance the stated objectives to "maximize energy efficiency, extend the usable life of residences and to improve the health and safety of the occupants." Prioritizing applicants who demonstrate ability to "leverage Program funding with other funding, resources or partnerships to increase benefits to low-income households," reinforces the need to work cooperatively to achieve the greatest possible benefit on behalf of Oregonians. We look forward to working with OHA and its partners to achieve these outcomes.

Sincerely,

DocuSigned by:

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Mark Wyman

Senior Manager—Innovation + Development
Energy Trust of Oregon