

Grant Application and Scoring Criteria Public Comment Summary

PCEF staff and Committee are charged with designing a program that meets the goals of addressing climate change causes and impacts while supporting racial and social justice. This includes balancing the responsibilities of removing barriers for historically marginalized communities and ensuring accountability in using public funds. Public input and feedback is a critical component in developing the PCEF program in a way that creates accountability and serves the needs of the community. Public feedback received on the draft application and scoring criteria from June 2, 2020 to June 26, 2020 is summarized below and will be used to inform changes that improve program design to meet the needs of the community and the intent of the program. Solutions are likely to fall into three categories: changes to grant application(s), changes to scoring criteria, and/or improved clarity and accessibility to increase understanding.

How public input was collected

PCEF staff collected public comments via online survey, email, one-on-one meetings, PCEF hosted webinars, co-hosted webinars, and public testimony. Several organizations took the opportunity to provide comment in more than one way (e.g., provide public testimony and email written comments). The table below shows that in total we received feedback from just over 100 distinct organizations (non-profits, business and government) and individual members of the public. The majority of responses came from non-profits; the 13 business responders were primarily contractors who do energy efficiency and renewable energy work. Twenty-six percent of unduplicated responses represent Black, Indigenous, people of color (BIPOC) led organizations. A full list of organizations that participated in the public comment period is provided at the end of this document. **Note that if we remove unknown respondents, one third of the total respondents are from BIPOC-led organizations.**

TOTAL Unduplicated public comment period participants	103
Non-profit organizations	63
Individuals/unknown	22
Business	13
Government	5

One-on-one meetings

Two thirds of the one-on-one meeting participants represent organizations led by people of color. Staff reached out directly to 42 community-based organizations with a focus on those that are led by and provide services to Black and Indigenous people. We held 12 one-on-one meetings, 8 with BIPOC-led organizations. The full list includes: (* indicates BIPOC-led organization)

African American Alliance for Homeownership*	Micro-Enterprise Services of Oregon*
Asian Pacific American Network of Oregon*	NAACP/Black American Chamber*
Audubon	Native American Youth and Family Center*
Community Energy Project	PCEF Coalition*
DePave*	Portland Community Reinvestment Initiatives*
East Portland Action Plan	Service Employees International Union 49

Webinars

A quarter of webinar participants represented BIPOC-led organizations. A total of 102 people attended the five webinars – three webinars were open to the public and broadly advertised and two were co-hosted (one with the Coalition of Communities of Color (CCC) and one with the PCEF Coalition). The majority of webinar attendees (65) represented non-profit organizations. Eighteen attendees did not provide an affiliation and the remaining attendees were split between business (10) and government (9). A total of 25 participants were representing BIPOC-led organizations, 22 of those were from the non-profit sector.

Email

There were 18 email submissions of public comment. The majority of submissions were from non-profits (10), followed by business (4), individuals (2), and government (2). Three submissions were from BIPOC-led organizations and eight were from organizations focused on serving PCEF priority populations. The three submissions representing BIPOC-led organizations are:

1. Professional Business Development Group
2. NAACP
3. PCEF Coalition (*representing six BIPOC led organizations)
 - a. Verde*
 - b. Community Energy Project
 - c. Latino Built*
 - d. OPAL Environmental*
 - e. Good Energy Retrofit
 - f. Portland Community Reinvestment Initiative*
 - g. Asian Pacific American Network of Oregon - APANO*
 - h. NAACP*
 - i. Sierra Club
 - j. Oregon Physicians for Social Responsibility

Public testimony

Eight non-profit organizations provided public testimony. Three were BIPOC-led organizations and one was the PCEF Coalition which includes BIPOC-led organizations and White-led organizations. Most of the organizations that provided public comment also submitted written comments either through email or the online survey.

Online survey

Twenty online surveys were completed. Twelve respondents provided organizational affiliation. Many respondents did not provide identifying information. Open-ended questions throughout the survey offered opportunities for narrative response; these, along with a summary of survey responder ratings of scoring criteria are included in the summary that follows.

What we heard

The majority of the online survey questions asked respondents to provide their rating on a scale of 1 to 5 where 1 = strongly disagree, 3 = neutral and 5 = strongly agree. Questions were asked about each of the six application criteria sections: organization capacity, project description and scope, environmental benefits, social benefits, workforce and contractor benefits, and budget. Respondents provided feedback separately for planning, small, and large grants regarding whether they felt the criteria were clear and easy to understand, whether their organization could answer the questions, and whether the criteria were allocated fairly and support the goals of PCEF. Survey rating responses were slightly positive with all average scores falling in the neutral and agree range. For the small and large grant draft applications, the areas with the lowest average scores were the criteria related to environmental benefit and workforce/contractor benefit; the highest average score was in the budget section. The draft planning grant application scored on average better than small and large grant applications, with all scores above 4 (agree), and no clear indication that one section was considered better than any other.

In total we heard from more than 100 unique entities and individuals through all modes of input (e.g. survey, one-on-one meetings, etc.). These organizations were primarily from the non-profit sector. Not surprisingly we received some conflicting feedback on specific criteria. Both BIPOC and White led organizations provided complimentary and critical feedback. **The sections that follow focus on the critical feedback, highlighting common themes and suggestions in an effort to identify the most important opportunities for improvement.**

Key themes across all respondents

1. The draft applications are too complex for many/most organizations that are small or not well established.

2. Prioritizing geography east of 82nd and low-income census tracts leaves out some members of priority populations and has other unintended consequences.
3. Applicants will need assistance and clarity with GHG emissions reduction estimates.

Key themes across BIPOC-led organizations

1. The draft applications feels too complex and asks for too much detail. Request to simplify and move detail out of scoring and into grant agreements.
2. Suggestion to de-emphasize organization history and experience with grants and projects in order to create new opportunities.
3. The questions around racial and social justice, diversity, equity and inclusion do not seem to be written with culturally specific organizations in mind and are difficult for them to answer.
4. Responses indicate that information requested is sometimes misunderstood (e.g., examples seen as requirements). Use of plain language and visuals can foster accessibility.

The summaries of feedback that follow provide some additional detail and are broken out into categories within the scoring criteria.

Summary feedback from BIPOC-led organizations

The feedback that follows represents frequently cited issues and concerns voiced by BIPOC-led organizations. All of these issues were also raised by at least one responder from White-led organizations.

- Overarching
 - Accessibility: use more plain language and create visuals to assist with navigation and understanding.
 - Too much detail required in application, request to move into grant agreement if awarded.
 - Giving points for experience with grants and/or large projects may hinder growth in small culturally specific non-profits.
- Organizational capacity criteria
 - Racial and social justice, diversity, equity and inclusion questions are difficult for culturally specific organizations to answer. These criteria appear designed for White-led organizations.
 - Organization demographics table: feelings on this criteria were mixed with some feeling it was very important and should be weighted more heavily and others seeing it as challenging, particularly when low-income people are the target population.
 - Engagement strategies and methods: level of detail requested is felt to be too onerous.

- Points for providing health insurance benefits will be a barrier to small organizations.
- Financials: smaller and culturally specific organizations may struggle to receive full points, many do not have audited financials, balanced budgets each year and/or operating reserves.
- Project description and scope criteria
 - Project communications plans: level of detail requested is felt to be too onerous. Suggest moving this to grant agreement if awarded.
 - Partnership requirements don't allow for culturally specific organizations to maintain power over their projects when working with partners and contractors.
- Environmental benefits criteria
 - GHG emissions calculations need to be high level, clear, and easy for applicants. Respondents did not understand how estimates will be made and expressed concern over ability to calculate.
 - Make some criteria more flexible (collapsing a few into one criteria), there is a sense that this is where some of the culturally specific organizations will be screened out.
 - Models for green infrastructure and regenerative agriculture GHG reduction are not well developed and should not be valued above other environmental benefits.
 - Difficult to define and explain indirect and embedded GHG emissions, needs clarity.
- Social benefits criteria
 - Points for reducing cost are too low.
 - Geography: Concern about focus on east of 82nd and lower income census tracts.
 - i. Focus on low income neighborhoods: 1) does not address displacement particularly in NE, 2) misses low income households and people of color in higher income neighborhoods, 3) excludes development of affordable home ownership opportunities in high opportunity neighborhoods where wealth creation is more likely.
 - ii. Note that focus on east of 82nd is from code. Potential solution is to move criterion out of scoring and into portfolio balancing.
- Workforce and contractor benefits criteria
 - Level of detail requested is felt to be too onerous.
 - Seems to favor organizations who are large and/or have done this type of work before.
 - Most criteria seem better suited for grant agreement than scoring.
 - Points for benefits for employees may be a barrier for small contractors.
 - Lack of clarity around what is meant by "strong strategy" in relation to recruitment, hiring and retention of target populations.
 - FTE/\$ invested may encourage low wages and/or high labor projects.

- Budget criteria
 - Section too heavily weighted.
 - Leverage points may discourage small culturally specific organizations.
 - Consider different budget templates for capital and non-capital projects.

Summary feedback from White-led organizations

These are themes that emerged from feedback provided by White-led organizations that are different than those common to both groups of responders.

- Overarching
 - Several responders indicated that the criteria seemed fair and the level of effort required to submit an application was fairly standard for public funds.
 - It is important to get enough information up front to guard against fraud, poor quality projects and misuse of funds. Balance simplicity with protecting the program and the public.
 - Increase small and large funding caps, potentially in future years.
 - Use existing recognized models to evaluate readiness of organization, measurement of impacts and program delivery. Examples include using IDP for construction projects, Earth Advantage verification for efficiency work, and International Living Future for project design.
- Project description and scope criteria
 - Experience and qualifications of the project team should be more heavily weighted, particularly with energy efficiency retrofit projects to avoid creating a greater liability resulting from poor quality work.
- Environmental benefits criteria
 - Accountability on GHG measurement needs to be informed by science and data, and consistently applied.
 - GHG/\$ invested could disadvantage deep retrofits and projects that are in low-income households with needed non-energy related improvements.
 - There is not enough weight placed on environmental benefits.
- Workforce and contractor benefits criteria
 - Requirement for strategies for utilization of diverse workforce was thought to be very important by some and too burdensome for the application stage by others.
 - Some responders expressed that requirements, not strategies, are needed to create change.
- Budget criteria
 - Consider different budget templates for different size projects

The list below includes organizations that: participated in webinars, completed online surveys, submitted email, had one-on-one meetings with PCEF staff, provided public testimony or some combination the aforementioned during the public comment period.

- 350PDX
- A&R Solar
- African American Alliance for Homeownership
- Asian Pacific American Network of Oregon
- Attic Access
- Audubon
- Bureau of Environmental Services
- Black American Chamber
- Black Food Sovereignty Coalition
- Bonneville Environmental Foundation
- Bullitt Foundation
- Burch Energy Services
- Carpenters
- Centennial Community Association
- Coalition of Communities of Color
- Community Energy Project
- Community Vision
- Constructing Hope
- Consultant
- Portland Area CSA Coalition
- DePave
- Department of Environmental Quality
- Earth Advantage
- East Portland Action Plan (EPAP)
- Ecumenical Ministries of Oregon
- Elevate Energy
- East Metro Arts and Culture Council
- Energy Trust of Oregon
- Exceed Enterprises
- Forest Park Conservancy
- Green Savers
- Grid Alternatives
- Healthequity Partners
- Home Performance Guild
- Housing Development Center
- Immigrant & Refugee Community Organization (IRCO)
- Ink:Built Architecture
- Innovative Housing Inc
- Good Energy Retrofit
- Latino Network
- LatinoBuilt
- Lloyd EcoDistrict
- Metropolitan Alliance for Common Good
- Micro-Enterprise Services of Oregon (MESO)
- Metro
- NAACP
- Native American Youth and Family Center (NAYA)
- Nutrition Garden Rx
- OPAL
- Oregon Limited Renewable Energy Technician Apprenticeship Program
- Oregon Solar Energy
- Oregon Solar Energy Industries Association
- Oregon Sustainable Agriculture Land Trust
- Oregon Tradeswomen
- PCEF Coalition
- Portland Community Reinvestment Initiative (PCRI)
- Physicians for Social Responsibility
- Portland Harbor Community Coalition
- Professional Business Development Group
- Prosper Portland
- Rose CDC
- Rosewood Initiative
- Schreuder
- Self Enhancement Inc.

- SEIU 49
- ShahTe' Gardens
- Sierra Club
- Small Business Utility Advocates
- Sunbridge Solar
- Sustainable Northwest + Solar Oregon
- The Blueprint Foundation
- Tucker Maxon
- Twende Solar
- Urban Greenspaces Institute
- Verde
- Women First
- Worksystems
- Zenger Farm
- Zero Coalition