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Comments on Proposed Evaluation Criteria for Benefits & Impacts to Low Income & Disadvantaged Communities in EPIC Grant Funding

See attached document

Additional submitted attachment is included below.



City of Long Beach
Department of Health
and Human Services

Los Angeles County
Department of Public Health

City of Pasadena
Public Health Department

Riverside University
Health System – Public Health

Santa Barbara County
Public Health Department

County of San Bernardino
Department of Public Health

County of San Diego
Health and Human Services
Agency

Ventura County
Public Health

February 15, 2019

Ms. Lorraine Gonzalez
California Energy Commission
Docket Unit, MS-4
Docket No. 19-ERDD-01
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Comments on Proposed Evaluation Criteria for Benefits & Impacts to Low Income & Disadvantaged Communities in EPIC Grant Funding

Dear Ms. Gonzalez and Members of the California Energy Commission:

The [Public Health Alliance of Southern California](#) (Alliance) is a coalition of the executive leadership of eight local health departments in Southern California. Collectively, the Alliance's members have statutory responsibility for the health of nearly 50% of California's population. The Alliance builds healthy, equitable communities through upstream multi-sector policy, systems and environmental change; and mobilizes and amplifies the Southern California local health departments' regional voice in important policy conversations.

The Alliance is pleased to see the Proposed Evaluation Criteria recognizing the importance of focusing investments in low-income and disadvantaged communities, including consideration of localized health impacts. We offer the following recommendations to strengthen the proposed criteria to elevate the social determinants of health and other public health considerations:

Incorporate the California Healthy Places Index to the Solicitation Manual Language as a Method to Identify Low-Income and Disadvantaged Communities

Because the social determinants of health are so influential to life expectancy and community conditions, the Alliance strongly recommends adding the [California Healthy Places Index](#) (HPI) as an additional tool to identify low-income and disadvantaged communities. The HPI, available at <https://healthyplacesindex.org/>, is a data and mapping tool developed by the Alliance and Virginia Commonwealth University's Center on Society and Health, that allows users to explore underlying local factors associated with life expectancy and to compare community conditions statewide. The HPI provides overall scores for communities and more detailed data on specific policy action areas that shape health based on socioeconomic conditions, such as housing, transportation, education, and more.

The HPI is currently used by many State agencies as an option to identify disadvantaged communities and address health concerns in grant programs,

including the California Transportation Commission's Active Transportation Program, Caltrans' Sustainable Transportation Planning Grants and Adaptation Planning Grants, the Strategic Growth Council's Transformative Climate Communities, California Air Resources Board's Community Air Protection Program, and the Southern California Association of Governments' Sustainable Communities Grants. In 2018, \$323.8 million in funding was available for regional and State grant programs using HPI as one of the selection criteria for disadvantaged communities and/or addressing health concerns. As of February 2019, there are nearly 50 agencies, businesses and community groups using HPI to integrate public health into their work. A sampling is available here: https://phasocal.org/wp-content/uploads/2019/02/HPI_Into-Action_Jan-2019.pdf.

The tools already identified in the Proposed Evaluation Criteria do a good job identifying air quality and environmental exposures. While these are important, the criteria would benefit from additional tools that provide stronger weighting of the social determinants of health. This need could be filled by the inclusion of HPI, providing increased grant opportunities for applicants in areas with poor health outcomes due to socioeconomic conditions. The EPIC Solicitation Manual is a natural fit for HPI given the program's purpose and selection criteria, therefore we strongly recommend including the HPI alongside the other tools.

Incorporate Additional Public Health Factors, Including the Social Determinants of Health, Health Equity and Energy-Related Health Impacts, to the Evaluation Criteria

In 8.2, Localized Health Impacts, the current criteria focus primarily on air quality and pollution exposure. While these factors are very important contributors to localized health impacts, there are additional factors including socioeconomic factors, chronic disease rates, and community conditions, that have a significant impact on public health. We recommend incorporating additional criteria in 8.2 that address these additional health factors so that projects providing health co-benefits would be elevated in the scoring criteria.

Recommended additions include:

- Measures of energy poverty and energy equity, and how development and deployment of low-carbon energy impacts both poverty and equity
- Energy efficiency and weatherization impacts on healthy homes, especially among low-income households
- Worker health
- Social determinants of health such as those identified in the California Healthy Places Index (HPI), the 25 indicators that comprise the HPI score, as well as the 40+ decision support layers included in the mapping tool
- Measures of Health Equity

Thank you for the opportunity to comment. We believe incorporating the HPI and additional health factors into the EPIC Grant Funding Criteria would significantly improve and enhance the funded projects and the communities that will benefit from this important funding. Please contact Tracy Delaney, Executive Director of the

Alliance at tdelaney@phi.org or (619) 722-3403 with any questions or clarifications about the recommendations offered above. Thank you in advance for your consideration.

Sincerely,



Barbara Ferrer, PhD, MPH, MEd,
Director,
Los Angeles County Department
of Public Health

Co-Chair, Public Health Alliance
of Southern California



Kelly Colopy, MPP,
Director,
Long Beach Department of
Health & Human Services

Co-Chair, Public Health Alliance
of Southern California



Tracy Delaney, PhD,
Executive Director,
Public Health Alliance
of Southern California