

**Norcross, Frank**

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**From:** Krievins, Paul [pkrievins@ihcda.IN.gov]  
**Sent:** Monday, February 01, 2010 1:07 PM  
**To:** Norcross, Frank  
**Subject:** Written Comments on Draft WAP Recovery Act Reporting Program Guidance

Mr. Norcross,

I wanted to offer up some commentary from a state-perspective on one of the new requirements proposed by WPN Program Notice 10-12.

The new Metric Activity in Attachment 1 "Total Head Count" which asks states to report the cumulative number of individuals compensated for any amount of work on Recovery Act-supported project will be extremely difficult for our state to report. To-date we are reporting job creation, retention, and job type for the stimulus, all metrics which clearly indicate the effectiveness of the ARRA funding as it relates to job stimulus. For our sub-grantees or the state to have to go back and try to reconcile job expenses with every individual compensated, would very likely interrupt production and reporting for some time.

Additionally, there is little guidance offered by the Notice as to how to track these individuals. Would they only be counted once in each quarter? Would they only be counted once in only one quarter? Will there be guidance forthcoming as to how this would apply to individuals such as sub-grantee's contractor's administrative staff and others not subject to Davis-Bacon? The questions abound.

If the purpose of creating this metric is to evaluate the widespread impact of ARRA funding, I believe our creation and retention figures do that. I would ask that the Department of Energy please relive this unnecessary burden from State offices and Sub Grantees by removing this metric.

**Paul Krievins**

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Census Day is April 1, 2010.

Be counted! For more information: [www.census.indiana.edu](http://www.census.indiana.edu)



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