



STATE OF IOWA

CHESTER J. CULVER
GOVERNOR
PATTY JUDGE
LT. GOVERNOR

DIVISION OF COMMUNITY ACTION AGENCIES
WILLIAM J. BRAND, ADMINISTRATOR

February 1, 2010

Frank Norcross, EE-2K
U.S. Department of Energy
1000 Independence Ave, S.W.
Washington, DC 20585-1290

Dear Mr. Norcross:

On behalf of the Iowa Weatherization Program, I am submitting comments on the proposed guidance regarding ARRA monthly reporting for the Low-Income Weatherization Assistance Program.

Following are our comments.

Section 4.0

The third paragraph states that "DOE may also gather "real time" data on implementation issues, challenges, and activities from Grantees as necessary. DOE is sensitive to the fact that these requests for information can be an interruption to the Grantees. DOE will exercise discretion in making these requests and will minimize their frequency so as to minimize the burden of effort placed upon Grantees."

Although the proposed guidance address proposed monthly reporting requirements DOE is currently gathering this "real time" data on a weekly basis. Although DOE may not consider this as weekly reporting, the weekly data DOE asks for is entered into DOE's Grant Reporting and Analysis Software System (GRASS reporting system). We received an email from our DOE project manager which said, "Attached is the weekly GRASS reporting format required for each state/grantee weekly." We receive calls each week from our DOE project manager asking for this information. That is weekly reporting.

Why doesn't the proposed guidance address the GRASS weekly reporting that is being required of states?

Section 5.2.3

DOE plans to migrate from the WinSAGA reporting tool to the Performance and Accountability for Grants in Energy (PAGE) reporting tool by April 2010. Although the guidance states that there are training videos available and that there will be webinars available, we are concerned that DOE is not allowing a sufficient amount of time for training on the new reporting system prior to the date we will be required to begin using it..

Attachments 1 and 2

The metric for Total Head-count is: Cumulative number of individuals If states are to report cumulative numbers each month then there will be double counting of workers. Section 6.2 of guidance on calculation of job creation through DOE recovery act funding states that for determining the worker "head count" workers should be counted once and only once. It further states that care must be taken to ensure a worker is not double-counted in multiple reporting periods.

Unless we are missing something here, if we report the cumulative number of workers each month, as stated in Attachments 1 and 2, then we will be double counting workers.

General

It is not clear what numbers are to be reported the first month of the monthly reporting. Are we to report the numbers for February 2010 only or the numbers for April 2009 – February 2010?

Thank you for the opportunity to comment on the proposed guidance.

Sincerely,

James Newton
Chief, Bureau of
Weatherization

Cc: Carl Saueressig, DOE Golden Office
Bob Scott, NASCSP