



February 2, 2010

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

Dear Mr. Norcross:

The state of Illinois' Weatherization Assistance Program would like to offer the following comments on the Draft Reporting Guidance set forth in WPN 10-12:

1. The requirement to move to an additional Monthly Reporting format places additional burden on the state and local Weatherization entities. The additional administrative burden of tripling the current reporting requirements will only result in a lower level of ARRA-WAP production. The states and subgrantees are already handling multiple visits by DOE/EERE, DOE/OIG, OMB, and the GAO. We understand that DOE is now attempting to plan field visits to five percent of all ARRA homes that have been weatherized nationwide. All of these activities hamper the ability to move forward on the program.
2. Section 5.2.2 b refers to Total Outlays by Subgrantee as being a required item in the monthly report. This detail will be very burdensome for many states and local Weatherization subgrantees to collect. If DOE feels that they must move forward on a monthly reporting basis, then the better option would be for the states to report the Total Statewide Subgrantee Outlay, and not attempt to break it out by individual subgrantee.
3. The new reporting measure in Attachment 1 "Total Head Count" which will require the states and subgrantees to report the cumulative number of individuals compensated for any amount of work on ARRA-WAP units. An additional ARRA Jobs Created metric will undoubtedly cause confusion. States are already reporting job creation, retention, and job type for the ARRA funds on the OMB 1512 reports. This creates two different standards for reporting on the ARRA. Subgrantees across the nation will need to go back and try to reconcile expenses for everyone involved with ARRA. Again, this will place further delays upon the ARRA production.

4. It should also be noted that the instructions in WPN 10-12 are very confusing, and inadequately detail the reporting of jobs. The draft OWIP Jobs Creation Reporting Program Guidance is confusing when compared to the draft OWIP Jobs Creation Calculator. We realize that the Program Notice makes reference to WPN 10-13 for reporting definitions. This WPN has not been finalized yet. It is difficult to comment on the report format, when the metric definitions are still in draft and somewhat confusing.

If you have any questions or would like additional information, I would be happy to discuss the reporting issues in detail. I can be contacted at randy.bennett@illinois.gov.

Sincerely

Randy Bennett
Weatherization Program Manager