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February 4, 2010

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I am writing to comment on the proposed draft reporting guidance under the 2009 Recovery Act for the Weatherization Assistance Program (WAP), published in the January 21 edition of the *Federal Register* and outlined in Weatherization Program Notice 10-2 and 10-XX.

The State of Connecticut strongly opposes this additional monthly reporting requirement because it creates an undue administrative burden on the current reporting system. This burden exists not only at the grantee level, but also with the subgrantees that must ensure that reporting to the grantee is done in a timely manner so that states can meet their deadlines for reporting to DOE.

We understand DOE's concerns regarding the rate of production of units for the ARRA weatherization program. However, one should understand the challenges that this state and others have faced in trying to accomplish these goals including the fact that the funding for local weatherization efforts was increased by more than twenty times over a two year period based on FY 08 funding levels.

Another major challenge was that all laborers and mechanics employed by contractors and subcontractors on projects funded directly by or assisted in whole or in part by and through the Federal Government pursuant to the American Recovery and Reinvestment Act of 2009, Pub. L. 111-5, shall be paid wages at rates not less than those prevailing on projects of a character similar in the locality as determined by the Secretary of Labor. This was a new requirement to the Weatherization Assistance Program. Most of the contractors that perform weatherization work never had to operate under the Davis Bacon Act and had to be trained on its requirements. Although most workers in Connecticut are paid higher than the prevailing wage for weatherization workers, contractors have been concerned about the time spent in preparing the WH-347 forms on a weekly basis. Our subgrantees were hesitant to use these contractors prior to their training on these requirements.

Requiring additional reporting will add to the challenges that have been described and will affect the production of weatherized units. Our subgrantees already feel burdened by the increased reporting requirements under ARRA and the Davis Bacon Act and feel that it prevents them from accomplishing the major goal of providing energy efficient homes and lowered energy costs.

In addition, DOE has now changed the methodology for jobs (direct, FTE, non-federal and total head count) and is also requiring for them to be reported on a monthly basis to the Project Management Center (PMC). This information will not be reported on FederalReporting.gov. I understand DOE's goal is to capture as many "jobs" that are affected by the Recovery Act, but reporting on non-federal jobs will now place additional burdens on our partners. These additional requirements will also increase the confusion that already exists in counting jobs.

From calls and emails that we have received from the PMC, it appears that DOE's biggest concern centers around production of weatherized units. It is easier to provide a monthly update on units weatherized than to perform various calculations pertaining to jobs (ARRA and non-federal) created and retained. Job reporting should remain as a quarterly reporting requirement.

I urge the Department of Energy to reconsider the additional reporting requirement burden that it is placing not only on its grantees but also on subgrantees, contractors and sub contractors that must report up especially for jobs reporting. Connecticut supports that transparency and accountability are essential features of the Act, but that must be balanced against the excessive requirements that impede subgrantees from getting units weatherized.

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

Sincerely,

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Deputy Commissioner

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