

Norcross, Frank

From: Bernie Hillman [bhillman@kyhousing.org]
Sent: Thursday, February 04, 2010 2:25 PM
To: Norcross, Frank
Subject: Comments on Proposed Guidance
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Dear Mr. Norcross,

On behalf of the Kentucky Weatherization Program, Kentucky Housing Corporation is submitting comments on the proposed guidance pertaining to both the frequency of reporting and the additional reporting requirements.

In general, the proposed added reporting requirements will result in additional time being dedicated to gathering, reviewing and reporting data and providing technical assistance to numerous agencies who are currently working diligently to meet the current program requirements – both reporting and performing Weatherization activities. Agencies, including Kentucky Housing, have absorbed the cost of providing administrative support to the program that is above and beyond that for which DOE is currently reimbursing. Additional reporting requirements will result in additional administrative costs charged to the program which reduces funding available for Weatherization activities.

Small community action agencies that bear the largest burden for collection and reporting data have been required to re-submit reports in the past due to changing DOE and OMB requirements. Also, the more complicated the reporting requirements become, the higher the opportunity for errors in the data. Specifically with regard to additional jobs metrics, non-federal jobs would be considered induced jobs under current OMB guidance. Also, the guidance regarding which non-federally funded jobs should be counted and the added discretion on whether or not to include a job increases the opportunity for errors and inconsistencies. Proposed total head count data is cumulative, yet the hours gathered and used for FTE calculation are not. Because the two are related but are reported differently, agencies will be confused about how to report people as opposed to hours. The level of technical assistance required to ensure that agencies are reporting timely and correctly will need to be increased.

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

Bernadette E. Hillman

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