Ohio Partners for Affordable Energy

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Comments of Ohio Partners for Affordable Energy

Regarding The

Proposed Emergency Agency Information Collection

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Ohio Partners for Affordable Energy (OPAE) hereby submits its response to the Notice and Request for Comments issued by the Department of Energy (DOE) regarding Proposed Emergency Agency Information Collection on behalf of its 60 nonprofit members. Our membership includes all the Home Weatherization Assistance Program (WAP) providers in the State of Ohio, three other nonprofits operating ratepayer funded programs, and all the agencies providing assistance through the Emergency Home Energy Assistance Program (E-HEAP). OPAE members have designed and manage award-winning weatherization programs for many of Ohio's investor-owned utilities. Agencies also operate fuel funds most Ohio counties. In addition, the nonprofits within the network manage a broad array of programs providing health care, food, housing, employment and training, home repair, budget counseling, and a host of other services to our communities.

OPAE and its members sympathize with the challenges faced by DOE and the Office of Management and Budget (OMB) in implementing the American Reinvestment and Recovery Act (ARRA), and the need to collect adequate data regarding the program. Our member agencies are being tested as well by the need to scale-up, train, and continue to provide quality service to our clients. In addition, our member agencies are current implementing an array of significantly expanded demand side management programs. All of these programs have reporting and monitoring requirements.

Fortunately, WAP is a mature program with established reporting requirements. These have already been enhanced by DOE, and our network has responded in partnership with our excellent state managers. The OMB requirements have been layered on top of these, with somewhat conflicting schedules that require multiple reporting of similar information.

The request for comments focuses on a series of questions raised as result of the Paperwork Reduction Act of 1995. Following are the comments of OPAE on behalf of its members providing services to low-income customers under WAP using ARRA funds.

a) *Does the proposed collection of information necessary for the proper performance of the functions of the agency, and does the information have practical utility?*

OPAE questions whether the duplication of information that must be provided to OMB and DOE has any practical utility given the overlapping timeframes and need to true-up reports to OMB with the information provided to DOE. While Ohio has worked closely to develop the 1512 forms, the reality is that by the end of the month the data is identical; the process is more elongated than necessary. Permitting a single report of the data to both entities at the close of the month should be adequate and would simplify the life of managers at 52 agencies, not to mention the state. Reporting is important, but reporting the data twice under different schedules has little practical utility.

OPAE also questions the utility of the Total Head Count, which is included as a Metric. About half of our agencies provide services through contractors. Conducting an unduplicated head count when a contractor is doing work for multiple agencies will be extremely difficult. If, for example, a contractor does work for three agencies, each agency will count the contractor's employees. Absent a system for comparing information on the contractor's employees so a person is not counted three times will require a review of the information by the grantee through a comparison of Social

Security numbers or other identifying information. The head count information really is not useful at all. Collecting data on FTEs is much more relevant from a program management and transparency standpoint.

b) *Is the accuracy of the proposed burden of the collection of information correct?*

There is a significant reporting burden on small businesses associated with collecting the data as proposed. All of our contractors are small businesses; the largest contractor has 24 employees. Requiring the 'mom and pop' small businesses to engage in extensive reporting significantly increases the burden on these contractors. The same is true for our member agencies, which also qualify as small businesses. Program managers indicate that the multiple reporting requirements demand significant amounts of their time. Additional metrics add to that burden. With the more frequent reporting, I would estimate individual subgrantees spend a minimum of three hours per week, the equivalent of almost four FTEs statewide. It is likely that the actual time far exceeds that estimate.

While much of the data is regularly gathered, with the increasing volume of jobs and the additional reporting requirements, it takes time to pull this information. Keep in mind all our agencies manage at least two other efficiency programs funded by utility ratepayers. The funds are combined on most units. At the end of the month, production data is reported not just to DOE and OMB, but also to the various utility program managers. Reducing the number of times we have to fill out forms will increase productivity.

As noted above, we believe the burden estimated for grantees, about 3 hours statewide, significantly underestimates the staff time need to meet the overlapping data requirements of OMB and DOE. Following the OMB process to its conclusion results in data that is identical to the DOE data. The flaw in the proposed process is that the state and its subgrantees have to report the numbers three times though the data is ultimately identical by the close of the reporting period. The additional work associated with the true up period is significant, let alone the other requirements. OPAE has worked hard to minimize the reporting associated with utility-funded programs in order to keep our agencies focused on serving low-income households. Unnecessary distractions caused by duplicative data requests do not make this job any easier.

c) *Is there a way to enhance the quality, utility, and clarity of the information to be collected?*

Ohio has worked with the federal government to standardize the approach for reporting job creation. Information on program outlays, leveraging, units, and the housing type, heating fuel, and occupancy characteristics are all relevant metrics and help assure proper management of the program. The quality can be enhanced by eliminating duplicative reporting. In addition, eliminating the problematic requirement to count heads, which lacks quality because of a lack of clarity, and the uselessness of the information, warrants the eliminating of this metric. There is no precedent under ARRA for reporting head count data, an additional reason to question the utility of the metric.

d) *Can the burden of the collection of the information on respondents be minimized?*

The simplest approach to reduce the burden is to combine the reporting to OMB and DOE into a single report as discussed above. Our Department of Development is moving forward with implementation of an electronic reporting system. We know, however, that testing and implementation of these systems takes times and will probably not be available simplify ARRA reporting. Hopefully, consistent funding over the long-term will permit us to adapt our reporting systems to more efficiently manage the higher volume of clients.