

Norcross, Frank

From: Darlene Kramp [Kramp.Darlene@CAASCC.org]
Sent: Thursday, February 04, 2010 4:37 PM
To: Melinda Johnson; Norcross, Frank; davidbradley@ncaf.org
Subject: RE: URGENT-TODAY: There's Still Time to Comment on new Federal ARRA Weatherization Report
Follow Up Flag: Follow up
Flag Status: Red

Our agency is Weatherization in St. Clair County. We have an ARRA budget of \$3.6 mil and have 512 units to complete by March 2012. We have currently adapted all of the reports that have been required and are currently trying to obtain all information to accurately submit reports in a timely matter. It currently takes two days to actually complete all reports to submit to the state. It would be most beneficial if one report was for all funding reporting instead of everyone having a different report and then asking for different information every month or quarterly. Also if a schedule was sent out to let the agencies know what reports and information they want and when they are actually due to each entity then they could be submitted in a timely matter and accurately. We use Contractors for all of our work and if they have a change over in employees then getting accurate information could take up to a few days which in turn would cause extra days to work on reports to make necessary changes. At this point we need to focus on production and keep reports in place to submit and not need to worry about additional information being collected. As always we will accommodate the State and Federal Government with any information they need in the best timely matter that we can.

*Darlene Kramp
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 Port Huron, MI 48060
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From: Melinda Johnson
Sent: Thursday, February 04, 2010 4:13 PM
To: Darlene Kramp
Subject: FW: URGENT-TODAY: There's Still Time to Comment on new Federal ARRA Weatherization Report

Don't know if you can answer this yet today?

Melinda K. Johnson, CCAP
 Executive Director
 Community Action Agency of St. Clair County
 302 Michigan Street
 Port Huron, Michigan 48060
 (810)982-8541
 Fax (810)982-7233

The Mission of the Community Action Agency of St. Clair County is to advocate for and provide people with limited income an opportunity

2/4/2010

to become socially and economically self-sufficient in their community.

From: David Bradley [mailto:caitlinwolf@ncaf.org]

Sent: Thursday, February 04, 2010 2:35 PM

To: Melinda Johnson

Subject: URGENT-TODAY: There's Still Time to Comment on new Federal ARRA Weatherization Report



Quik-FACTS

Volume 17, Number 3

February 4, 2010

Today or Never:

Your Last Chance to Cut Down On Weatherization ARRA Reporting

NCAF has heard hundreds of legitimate complaints from Weatherization agencies regarding new reports required by the Department of Energy. On Jan. 26 we notified all of the opportunity to make public comment to OMB on DOE's finding that new reports would take only 3 hours monthly for the entire WAP network of each state and would not require any work at all of small businesses.

AS OF THIS MORNING ONLY THREE CAAs AND THREE STATE OFFICES HAVE SENT ANY COMMENTS AT ALL.

THE DEADLINE IS ANYTIME BEFORE MIDNIGHT.

NCAF cannot make these changes without your support,

YOU CAN COUNT ON THE ADDITIONAL REPORTING GOING THROUGH IF THERE ARE NOT MANY MORE RESPONSES.

You may look through the documents linked to the original CAP-FACTS which appears below, or you can use the following quick talking points that hit the major issues. All comments can be emailed.

Key points for fast response:

Introduce your agency and its role in the ARRA-WAP. How many dollars and units will you manage?

Have you reserved your spot for the 2010 annual NCAF Legislative Conference? Come hear the latest from key members of Congress, March 3-5 in Washington, DC! Hotel rooms are filling up quickly, [register now!](#)

Quick Links

[NCAF Website](#)

[NCAF Blog](#)

Join us May 3-7, 2010 at the Renaissance Vinoy Hotel in St. Petersburg, Florida for the [2010](#)

Tell:

1- How long it takes to produce a monthly report on production, spending and brand new individuals working that month (who never before worked in your program) in time for the state to submit it on the 20th.

- Is this the same deadline you now use? If not, tell what time and personnel changing systems involves. Make it clear you're a single local agency so that DOE can consider what all that time might add up to statewide.
- What about every quarter when Recovery.gov reports are due the 30th? Is that 2 reports? How much more time?

2- Unless you already ask your staff or your contractors for the list of SSNs of their workers in the previous month that were never before on their payroll AND you already check the lists they send you to be sure you never reported these before [on the payroll of a different contractor], tell DOE how long that data collection will take each month. Also explain whether any small business will have to spend time contributing data (unless you are all-crew or your subs are large business, probably a yes..). If so, how much? THIS ITEM IS NEW FOR BOTH MONTHLY AND QUARTERLY REPORTS. You will have to complete the first such report Feb. 20.

3. Describe roughly the amount of time each month your staff and small business contractors spend on currently required DOE reports. List or describe the reports.

Email your comments to:
frank.norcross@ee.doe.gov.

PLEASE CC davidbradley@ncaf.org

THE JAN 26 CAP-FACTS REPRINTED

DOE & OMB have invited comments on two new ARRA Weatherization reports by Feb.4. The request for comment in federal register is at <http://edocket.access.gpo.gov/2010/pdf/2010-1057.pdf>. It says:

Comments are invited on: (a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility; (b) the

War on Poverty Workshop.

This year's workshop will have a special focus on those interested in pursuing a long-term career in community action.

The workshop will focus on:

Understanding key concepts of Community Action

• Examining who we are as professionals in Community Action, and why we possess this identity

• Exploring the role(s) each one of us possesses in determining the identity of Community Action

• How we can change our local communities

accuracy of the agency's estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used; (c) ways to enhance the quality, utility, and clarity of the information to be collected; and (d) ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology.*

The deadline is Feb. 4. If you comment, please send a copy to us via megpower@ncaf.org.

DOE has published the request with descriptions of the monthly and quarterly data it will require for ARRA-WAP that are not required for regular WAP : http://apps1.eere.energy.gov/wip/draft_recovery_act_reporting_guidance.cfm. You will need to read the guidance for Weatherization programs and also the document "Draft OWIP Jobs Creation Reporting Guidance."

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NCAF SUMMARY of the Local Agency Elements of the New WAP Reports to DOE

The following detailed material is for CAAs and other Weatherizers who continue to take a deep interest in these reporting and paperwork issues.

New data items in **Quarterly Reports** to the DOE (see Appendix 1 of the draft guidance on DOE's site)

- FTE ARRA Jobs created (same as OMB requirement),
- FTE Jobs created with non-federal matching fund (probably does not apply to any local WAP, as this refers to cost-share, unless state or local personnel are paid by their employers to work on ARRA WAP but are paid out of non-federal funds; in that case their time is to be included).
- Cumulative 'head count'. The number of individuals paid from ARRA funds for any amount of time. 'Cumulative' means that each quarter you report only individuals (SSN's) that were never counted in any previous quarter.
- Your total Quarterly ARRA outlays by function (Admin, Program Operations, vehicles etc)

New Monthly Report Items:

A smaller number of key items will be collected monthly from states, based on their reports from subgrantees. The items are due to DOE on the 20th of each month. Subgrantees will report to the state on

as Community Action professionals

• How we can make a national impact as members of the national Community Action movement.

[Register Today!](#)

Take Advantage of the GM Discount
CAPs have been taking advantage of the [\\$500 dollar discount](#) they are eligible for through NCAF's new GM partnership. To purchase a vehicle in your area simply provide your local dealer with a copy of your CSBG contract cover page, data sheet and signature page, and receive \$500 off of your lowest negotiated

- The cumulative 'head count', as described for the quarterly reports above
- Units weatherized and re-weatherized.

deal. For more information, [click here](#), or [email us!](#)

What NCAF said to DOE about monthly reports:

After early discussions with the leaders of the DOE programs, we agreed that short monthly reports on production and state spending would help get the positive message of ARRA-WAP impact out and might provide early warning about states whose programs are bogged down.

NCAF asked for some changes in the draft plan including:

- That reports be due the 30th, not the 20th, of the month. We believe that schedule allows time for the data to be cleaned and checked and also avoids having two different report due dates in the months (Jan., Apr., July. and Oct.) that quarterly reports are also due.
- We asked for clarity regarding which non-federal funds would 'count' in creating jobs.
- Several other NCAF concerns were allayed by re-writes in this final draft.
- We did not have a chance to review the request for cumulative, unduplicated 'head count' and look forward to reading your comments on the time required of agencies and their contractors to produce that report.

***Understanding Federal Register notice's question #b) about whether the time burden and cost burden estimated are accurate:**

DOE received conditional approval for its monthly data collection by submitting [the material required by the Paperwork Reduction Act](#) that justifies an emergency reporting expansion. That form includes an estimate of the time and cost burden of the proposed reports. DOE said

"The hours of burden for the monthly report are estimated to be 3 hours. The number of respondents is 58 States, territories and tribes. The grantees' {states/territories} burden is calculated as follows: State burden hours: 3 hours x 58 grantees x 12 months = 2,088 hours."

The same document states that there will be no impact on any small business. The assumption is that states would collect this data anyway,

therefore creating no extra burden on local agencies. Your comments validating or disputing that time estimate for your state's network is being requested.

Written comments may be mailed or emailed by COB February 4 to:

[mail]

DOE Desk Officer, Office of
Information and Regulatory Affairs,
Office of Management and Budget,
New Executive Office Building, Room 10102,
725 17th Street, NW. Washington, DC
20503; and

Mailed to
Frank Norcross, EE-2K, U.S.
Department of Energy,
1000 Independence Ave., SW., Washington,
DC 20585-1290, Fax#: (202) 586-1233,

OR:

Emailed to:

frank.norcross@ee.doe.gov.



David Bradley, Executive Director

National Community Action Foundation

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