

Norcross, Frank

From: Kip Bowmar [kip@kaca.org]
Sent: Thursday, February 04, 2010 6:41 PM
To: Norcross, Frank
Subject: Comments on weatherization reporting requirements
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February 4, 2010

Frank Norcross, EE-2k, U.S.
Department of Energy
1000 Independence Ave, SW
Washington, D.C. 20585-1290

Dear Mr. Norcross,

Thank you for the opportunity to comment on the proposed reporting changes in the weatherization program. Community Action Kentucky has a contract from Kentucky Housing Corporation and the Finance and Kentucky Administration Cabinet to administer the weatherization program statewide. We work with 22 Community Action Agencies and one unit of local government. We believe that taking quarterly reporting to monthly reporting will be counterproductive for a variety of reasons. The first is that it presently takes far more than a total of three staff hours to complete quarterly reports now and making that monthly will triple the existing requirements. Keep in mind that we frequently have to contact local agencies throughout the quarter to gather, edit, refine and finalize the data that is ultimately submitted. The quarterly time frame helps ensure that data is more accurate.

Furthermore, the total head count of workers is a new concept, is contrary to what is in the OMB 1512, and the guidance on this is confusing. It will cause confusion with local agencies and keep in mind those contractors work with over 50 sub contractors across the state who do not track data in this fashion. This is above and beyond the information the contractors are completing for Davis Bacon. The way the regulation is written it could easily cause double reporting. The local agencies and sub contractors already feel overwhelmed and bogged down by current reporting requirements. Adding to that will make it more difficult for us to successfully meet our goals. We hope that you would reconsider.

Thank you very much for your consideration and if you need additional information, please feel free to contact me.

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Kentucky's Poverty Fighting Network