

**Norcross, Frank**

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**From:** Grant, Barb [BGrant@OperationThreshold.org]  
**Sent:** Thursday, February 04, 2010 8:08 PM  
**To:** Norcross, Frank  
**Cc:** David Bradley; Meg Power  
**Subject:** Comments Re: Proposed Reporting Guidance  
**Follow Up Flag:** Follow up  
**Flag Status:** Red

Dear Mr. Norcross:

Thank you for the opportunity to comment on the proposed reporting guidance.

Operation Threshold is a Community Action Agency serving 3 counties in northeast Iowa. We are projected to receive over \$4.5 million in DOE ARRA funds—including production, technical assistance & training, and admin—and to weatherize at least 445 homes with these recovery dollars.

**Time Spent on Reporting Activities:**

Currently, our monthly expenditure, production, and T&TA reports are due to the state on the 8<sup>th</sup> of the month. Currently, it takes an average of 1 hour to complete the monthly T&TA report.

Quarterly, we submit vendor reports, training hours, weatherization hours. On average, it takes 6 hours to complete the vendor report, 2 hours for the training hours report, and 2 hours for the weatherization hours report. Additionally, it takes, on average, an additional 2 hours to follow-up on the reports submitted.

If you were to calculate the hours spent on the current reporting activities, it would average 4.3 hours per month, including the follow-up time.

If we were to have to track the hours worked by vendor employees we anticipate it would take 10 hours to set-up the reporting system and would require 6 hours per month to complete the report. In addition, we anticipate it would require small businesses 4 hours per month to provide the additional information that we would need to meet the reporting requirement.

In total, our staff time spent monthly on reporting activities of current and proposed reporting would be 10 hours per month. In addition, the many small businesses that serve as contractors in the weatherization program would each spend, on average, an estimated 4 hours per month to meet the proposed reporting requirements.

**Timing of Reports:**

If the due dates for the all non-production and expenditure reporting were moved back to the 30<sup>th</sup> of the month, it would allow us more time to insure greater accuracy and less confusion. In addition, it would afford us the opportunity to work around the schedules of our small business vendors, rather than interrupting their business operations to clarify items on their reports.

**In General:**

I certainly understand the need for reporting and accountability, and appreciate the remarkable opportunity that we have been given to meet the needs of those we serve; however, the duplicative nature of some of the

reports, the exhaustive content, and the timing of the reports is burdensome. Allowing us ample advance time to set up new systems—both internal and with our vendors—as well as adequate time to prepare the reports during the month, would help us effectively, and accurately, meet our reporting responsibilities.

Thank you again for the opportunity to comment on the proposed requirements.

Sincerely,

Barbara A. Grant

**Barbara A. Grant**  
Executive Director



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