

**Norcross, Frank**

---

**From:** Larry Eyer [LarryE@kcr.org]  
**Sent:** Thursday, February 04, 2010 9:03 PM  
**To:** Norcross, Frank  
**Subject:** DOE ARRA weatherization regulations  
**Follow Up Flag:** Follow up  
**Flag Status:** Red

Dear OMB and DOE officials,

I am writing regarding proposed ARRA weatherization reporting requirements. Our local community action partnership has been weatherizing homes for more than 30 years and I have served as Executive Director for nearly all that time. We anticipate receiving a total of \$1,342,024 in ARRA weatherization funds and anticipate weatherizing at least 206 housing units with these dollars. These funds represent about 5% of our annual budget. At this point we are well ahead of our production goals. We are appreciative of these additional funds and the investment in weatherizing homes in our community.

It is my understanding that DOE indicated its new reports would take only 3 hours monthly for the entire WAP network of each state and would not require any work at all for small businesses. I do not know what all was included in the study, but on the face of it that is not at all true. For example it takes our small business contractors 2-3 additional hours per job to fill out wage and hour paper work. Some have opted not to participate. The production and financial reporting for our agency is at least 20% greater than before ARRA. We have had to add an office staff member to handle the additional paperwork.

The most onerous and difficult regulations have to do with reporting timeframes. To meet DOE requirements our state requires that we report financial information within 5 days after the end of the month and production information on a weekly basis. Imagine the pressure this puts on our community action finance staff to meet these timeframes when they have increased workload from the new unit costing requirements, and another 50 different government contracts to report on, like Head Start, LIHEAP, WIC, HUD, AmeriCorps and a host of other programs. Allowing 10 more days for financial reporting would be much more reasonable with relatively little sacrifice of timeliness. Similarly, the addition of 10 more days for production and training reporting would take off a significant amount of pressure. We urge you to take these into consideration.

Larry Eyer  
Executive Director  
Kitsap Community Resources