

Comments on
Federal Register Notice
Announcing Hearings on Nonprofit Agency Governance and Executive Compensation

71 CONF/LGC:

These proposed changes would have two net impacts: 1) Preaward, the regulations will tend to reduce slightly the number of qualified firms. 2) Postaward, the regulations would add additional protection to the Government's interests when long term contracts are noncompetitively renewed.

12 CONS:

It appears the Committee is seeking information on what is reasonable compensation, which is assumed to be pay. One method is to use www.salary.com. For example, a search on www.salary.com for a food services director in San Antonio found: The median expected salary for a typical Food Services Director - Higher Ed. - in San Antonio, TX is \$71,242.

82 CONS:

Current "safeguards" in place appear to be appropriate. The initial qualification for becoming a workcenter in 41 CFR's appear to be sufficient. As far as the effective of executive compensation on pricing, the percentages charged for "Other Burden" and the NISH fee are set by the Committee, and any increase in those rates has to be approved by the President's Committee. Scrutiny should be on the initial end to ensure workcenters have the capability (funds/manpower) to complete a contract.

17 CONS:

Agree in general with the proposed changes. However where the committee is seeking further information and perspective in the areas related to governance practices I question paragraph 3, which states "Should accreditation by one or more state or national organizations be recognized as evidence of a nonprofit agency adhering to good governance practices with out further review by the Committee?" We would answer no. I'm sure there are different accreditation standards between the states and a Federal program should adhere to the same standard for all participants. I could offer other opinions but supporting information for some of the specific issues is lacking.

314 CONS:

We favor more oversight of non-profit agencies. We favor some sort of required accreditation requirement. Many of the non-profits we deal with are long on compassion and dedicated to their mission of serving the disabled but short on the business skills and acumen that would result in efficient/effective contract performance.

47 CONS:

In order to be considered for evaluations, any cost proposal should contain ALL associated costs to include executive compensations. This way, costs can be allowable/allocable through the negotiations process. Further, if a JWOD agency ever expects to request an increase in those compensation costs, they would be included in the original proposal.