



STATE OF CONNECTICUT
DEPARTMENT OF SOCIAL SERVICES
25 SIGOURNEY STREET • HARTFORD, CONNECTICUT 06106-5033

VIA EMAIL

October 7, 2010

DOE Desk Officer,
Office of Information and Regulatory Affairs
Office of Management and Budget
New Executive Office Building, Room 10102
735 17th Street, NW
Washington DC 20503

Christine Platt Patrick, EE-2K
U.S. Department of Energy
1000 Independence Ave. S.W.
Washington, DC 20585

Dear Ms. Patrick,

I am writing in response to the proposed Department of Energy Historic Preservation Report. We appreciate the opportunity to provide the Department of Energy with feedback on this proposed report and share our concerns with your office.

It is the opinion of Connecticut's Department of Social Services (DSS) that this report is unnecessary and would be overly burdensome on our staff. In addition to the OMB-1512, we are currently responsible for reporting program activities to DOE on a monthly and quarterly basis between the two grants that we administer for both ARRA and DOE Weatherization. While it is true that this report would need to be performed on an annual basis, we still would need to develop data for two programs and coordinate with the State Historic Preservation Office (SHPO) to answer these questions.

Additionally, the proposed October 30, 2010 deadline for completion of this report is unrealistic. Comments on the report are being accepted through October 7, 2010, leaving only 15 business days to complete the actual report, should we receive a final order to proceed on October 8, 2010. This approval timeframe is unlikely, so we would be left with even less time to complete the report.

The coordination involved in accurately completing this report will prove difficult, especially when we are still working toward compliance with Section 106. If you do decide to go forward with this report, it is our hope that the deadline for the first reporting period will be extended to March, 2011 at the earliest.

Although there are 14 items to complete, we will have to work with the State Historic Preservation Office to obtain the information in order to complete the report. It has come to our attention that the State Historic Preservation Office does not have readily-accessible databases and relies heavily on paper-based communication and files. The lack of a centralized tracking system for projects subject to review is a concern in order to meet the tight deadline for completion, should this proposed Reporting Guidance be approved

Please contact Gretchen Yelmini, Field Monitor, if you have any questions or need additional information related to our concerns. She can be reached at 860.424.4874 or gretchen.yelmini@ct.gov.

Sincerely,

Carlene Taylor, Manager
Community, Energy and Refugee Services

cc: Michael P. Starkowski, Commissioner, Department of Social Services
Claudette J. Beaulieu, Deputy Commissioner, Department of Social Services
Pamela A. Giannini, Director, Bureau of Aging, Community and Social Work Services
Erin Clark, ARRA WAP Project Manager
Gretchen Yelmini, Weatherization Field Monitor