

Paperwork Reduction Act Submission:
Supporting Statement for Information Collection Requirements for the
LIHEAP Grantee Survey
(OMB Control Number 0970-0076)

September 2007 (Updated November 2007)

A. Justification

1. Circumstances Making the Collection of Information Necessary

The authority to collect information for the Low Income Home Energy Assistance Program (LIHEAP) is contained in Section 2610 of title XXVI of the Omnibus Budget Reconciliation Act of 1981 (Public Law 97-35), as amended (42 U.S.C. 8629).

Section 2610 of the LIHEAP Statute stipulates that the Secretary shall provide for the collection of certain data (**Attachment A**). This section also requires the Secretary to submit to Congress each fiscal year a report on the data collected, on how States carry out certain requirements, and the impact of each State's program on recipient and eligible households, and on other data. There are no other data collection efforts being conducted by the U.S. Office of Community Services (OCS) or other entities that provide the fiscal data included on the *LIHEAP Grantee Survey*. Without the collection of these data, there is no way to report to Congress on State-specific and aggregated fiscal data for the most recent fiscal year on the program.

2. Purpose and Use of the Information Collection

OCS uses the mandatory Survey to collect and report on the States' annual estimates of their sources and uses of LIHEAP funding, LIHEAP average household benefits, and maximum annual income cutoffs for 4-person households for LIHEAP (**Attachment B**). Both the aggregated and state-specific data are included in the Secretary's annual *LIHEAP Report to Congress* (**Attachment C**). The data also are used to respond to inquiries from Congress, OMB, and the White House relating to budget and program decisions.

3. Use of Improved Information Technology and Burden Reduction

The *LIHEAP Grantee Survey* and instructions are sent to LIHEAP grantees in hard copy along with an LIHEAP Action Transmittal. The Survey also is sent as an Excel spreadsheet by e-mail to State LIHEAP grantees. In addition, the Survey is available as an Excel spreadsheet for downloading on OCS' LIHEAP web site at:

www.acf.hhs.gov/programs/liheap/forms.htm#SURVEY

4. Efforts to Identify Duplication and Use of Similar Information

No similar data are available for all categories of sources and uses of federal LIHEAP funds. Without this collection effort, there would be no timely uniform data available to comply with requests from Congress, OMB, and the White House. Nor would information regarding the impact of program funds be available for the Department's *Annual LIHEAP Report to Congress*, for hearings, and during the appropriations and oversight process.

5. Impact on Small Businesses or Other Small Entities

This data collection effort does not involve small businesses or small entities. Only the program offices of the 50 States and the District of Columbia are involved in the Survey.

6. Consequences of Collecting the Information Less Frequently

It is necessary to collect the data yearly for the annual *LIHEAP Report to Congress*.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

There are no special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside the Agency

ACF has sought comments on the renewal of OMB approval of the *LIHEAP Grantee Survey* through the following actions:

- On 3/26/07, an information collection notice was published in the *Federal Register* (72 FR 14115) requesting comments and suggestions about the *LIHEAP Grantee Survey* (**Attachment D**).
- On 5/8/07, OCS mailed the notice to State LIHEAP grantees through LIHEAP Information Memorandum 2007-3. The Memorandum was also posted on OCS' LIHEAP web site at http://www.acf.hhs.gov/programs/liheap/guidance/action_transmittals/at07-03.html.
- On 5/11/07, OCS sent an e-mail message to all State LIHEAP Directors, requesting comments and suggestions on the renewal of OMB clearance of the *LIHEAP Grantee Survey*. Only 3 States (Arkansas, Idaho, and Wisconsin) responded (**Attachment E**). Arkansas indicated that although certain data concerning the program are useful and should be reported, the Grantee Survey should be revised to decrease the time and burden placed on States to gather and provide the requested information. We ask for estimates, not actual expenditures, that good management would require. Reporting the maximum household income does not require more than agencies must routinely account for due to statutory provisions.

Idaho stated that this collection of information is not necessary for the performance of functions of the agency and that the only new information on the Grantee Survey is average household benefit information. However, this information has actually been included for years. The State also indicated that the Grantee Survey can be incorporated into the LIHEAP State Plan process including coordination of reporting due dates. We respond that the LIHEAP State Plan requests what grantees plan to do whereas the Grantee Survey is completed after the fiscal year is over and indicates what grantees actually did. Additionally, Idaho suggested that HHS and OMB coordinate and streamline the requests for information. We agree that such an approach would be beneficial. However, this is not something that we have the authority to do. The Grantee Survey is the only form we request that asks for this information.

Wisconsin does not feel the Survey creates a new burden for the State and indicated that the information collection is similar to information the State uses to manage the block grant. We agree that States would have to maintain the fiscal data on the program as part of their financial management system.

9. Explanation of Any Payment or Gift to Respondents

We do not provide any payment or gifts to respondents for completing the Survey.

10. Assurance of Confidentiality Provided to Respondents

Confidentiality is not an issue as only aggregated household data are collected.

11. Justification for Sensitive Questions

There are no questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

12. Estimates of Annualized Burden Hours and Costs

The hour burden estimate is based on the number of State LIHEAP grantees (51 States and the District of Columbia) completing the information collection annually.

The current OMB inventory for this collection is 178.50 hours. OMB approval for use of this form expires on January 31, 2008. The number of burden hours will remain the same.

The estimated response burden is calculated the same way as the previous information collection. The calculation of annual burden hours is as follows:

Instrument	Number of Respondents	Number of Responses per Respondent	Average Burden per Response	Total Burden Hours
LIHEAP Grantee Survey	51	1	3.5	178.50

The annualized operational hourly burden cost to the States in dollars for responding to the Survey is estimated to be \$5,355. This amount was calculated by multiplying the burden of 178.50 hours by \$30, which is the estimated hourly rate of State LIHEAP staff involved in responding to the Survey.

13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers

There are no start-up or ongoing costs associated with the Survey. Therefore, we estimate the average annual marginal for capital and start-up costs to respondents or record-keeper to be \$0. This estimate is based on the following assumptions:

- The data generally are available as part of each State's financial management operations for the program.
- No additional staff time should be required to program grantee computer systems to prepare the necessary data as the reporting requirements have not changed.
- The costs associated with inputting, generating, maintaining, and disclosing or providing the information is assumed to be zero as LIHEAP agencies already have purchased computers and software to operate their programs.
- Generally, there is no purchase or contracting out of information collection services as such services are routinely performed in-house.

14. Annualized Cost to the Federal Government

The estimated federal cost of this information collection totals to \$25,874, based on the following calculations:

Cost Item	Person Year	Salary	Total
GS-12, step 1--(1) prepares an Action Transmittal to instruct state LIHEAP Grantees in completion of the reporting requirement, (2) follow up with grantees concerning report submission and data clarifications, and (3) input, tabulate, and edit the data. (This cost should be reduced once OCS' MIS becomes operational in FY 2005.)	0.25	\$66,767	\$16,692
GS-14, step 7--(1) updates Survey and instructions, (2) prepare individualized Surveys for the States, and (3) oversee the collection effort and prepare statistical tables, footnotes, and text for the annual <i>LIHEAP Report to Congress</i> .	0.08	\$112,586	\$9,007
Xeroxing and mailing an annual Action Transmittal to instruct grantees to complete the Survey. No additional operational expenses will be incurred for equipment			\$175
Grand Total			\$25,874

15. Explanation of Program Changes or Adjustments

There is no adjustment from the previously approved collection.

16. Plans for Tabulation and Publication and Project Time Schedule

The results of the information collection will be published in the Department's annual *LIHEAP Report to Congress*, which is due by June 30 of each year. The state-level data will be prepared as tables in Appendices C of the *LIHEAP Report to Congress* and the aggregation of the state-level data will be reported in Appendix I of the report (**Attachment C**). Complex analytical techniques will not be used as totals and percent distributions only will be tabulated.

The projected time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates and other actions is

shown below, starting with data for FY 2007.

The data gathered from the Survey also will be published on the web within two months after completion of the Survey.

Activity	Weeks following OMB approval
Surveys submitted to OCS	10
Surveys reviewed for completeness	12
Data inputted and edited	16
Statistical tables prepared	18
Footnotes and text prepared	19
Tables, footnotes, and text integrated in the annual <i>LIHEAP Report to Congress</i>	30

17. Reason(s) Display of OMB Expiration Date Is Inappropriate

The expiration date for OMB approval of the information collection will be displayed on the report forms and instructions.

18. Exceptions to Certification for Paperwork Reduction Act Submission

There are no exceptions indicated to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of Form OMB 83-I.

B. Collection of Information Employing Statistical Methods

The information collection does not employ statistical methods. Although the title is Grantee Survey, the form is simply a census of the States and the District of Columbia in the universe of grantees.

Attachments

- A. Section 2610 of the LIHEAP Statute (42 U.S.C. 8629)
- B. *LIHEAP Grantee* Instructions and Form
- C. Tables from the *LIHEAP Report to Congress for FY 2004*
- D. Responses from States of Arkansas, Idaho, and Wisconsin