

Paperwork Reduction Act Submission:
Supporting Statement for Information Collection Requirements for the
Low Income Home Energy Assistance (LIHEAP) Household Report
September 25, 2008

A. Justification

1. Circumstances Making the Collection of Information Necessary

The Low Income Home Energy Assistance Program (LIHEAP) block grant (42 U.S.C. 8621) was established under Title XXVI of the Omnibus Budget Reconciliation Act of 1981, Public Law 97-35 ("LIHEAP statute). Title I of the Energy Policy Act of 2005 (Public Law 109-58) reauthorized LIHEAP through Fiscal Year (FY) 2007 with reauthorization pending. The Office of Community Services (OCS) within the Department of Health and Human Services' Administration for Children and Families (ACF) administers LIHEAP at the Federal level.

Since FY 1982, the LIHEAP statute has required the collection of data on the number of households assisted and their income levels, by type of LIHEAP assistance. Over the years, the LIHEAP statute, as amended, has expanded the household data requirements. The data are collected through the *LIHEAP Household Report* which consists of the following: (1) **Long Format for Assisted Households**; (2) **Long Format for Applicant Households**; and (3) **Short Format for Assisted Households**.

Using its Program Assessment Rating Tool (PART), OMB's assessment of LIHEAP in 2003 concluded that "results were not demonstrated" (www.whitehouse.gov/omb/expectmore/summary/10001059.2003.html). The OMB assessment included a review of available data on LIHEAP reciprocity targeting performance. Thus far, the data on reciprocity target performance has been limited to households receiving heating assistance. Unduplicated data are unavailable on households which may have received other types of LIHEAP assistance.

OCS proposes to phase in additional household data requirements to obtain comprehensive data on LIHEAP reciprocity targeting performance, as part of OCS' PART LIHEAP Improvement Plan. OCS is seeking OMB approval to reinstate with revisions the *LIHEAP Household Report* for which OMB clearance expired on October 31, 2006 (**Attachment A**). OMB renewal of the *LIHEAP Household Report* was not obtained in time for LIHEAP grantees to report household data for FY 2007 and FY 2008. Grantees were instructed to report the data on the last OMB approved *LIHEAP Household Report*. The Report that indicated that OMB approval was pending. This was done so that LIHEAP grant awards were not delayed as the Report is a required component of the LIHEAP grantee application. In addition, no changes were made to the Report's reporting requirements.

Originally, OCS proposed to add the following data requirements to the ***LIHEAP Household Report--Long Format for Assisted Households***:

- The number of assisted households having at least one "frail elderly" person, *i.e.*, a person 60 years or older having a disability lasting 6 months or longer that limits the person's ability to leave the home without assistance. This item would help approximate the number of assisted households having "frail older individuals" that Section 2603(4) of the LIHEAP statute identifies as part of the "vulnerable population" (the statute does not define the term "frail elderly"). The definition also approximates disability, as measured by the Census Bureau's American Community Survey.
- An unduplicated count of assisted households that receive LIHEAP assistance regardless of the type(s) of assistance provided to recipient households. This item would increase the accuracy of measuring administrative cost efficiency of State LIHEAP grantees in providing assistance to LIHEAP households. This measurement is a component of the LIHEAP Improvement Plan under PART.
- An unduplicated count of assisted households, by type of LIHEAP assistance, having at least one vulnerable member, *i.e.*, a "frail" older individual, disabled person or a young child. This item would allow for effectively measuring the overall targeting of LIHEAP assistance to vulnerable households.

OCS requests that OMB approval of the *LIHEAP Household Report* be reinstated for FY 2009 and FY

2010 without any changes for the following data which have been collected previously:

- number of assisted households containing at least one member 60 years or older, disabled, or a young child;
- number and poverty levels of households applying for LIHEAP assistance;
- number of assisted households with least one member age 2 years or under; and
- number of assisted households with at least one member ages 3 years through 5 years.

In reducing the burden on small LIHEAP grantees, all Indian Tribes and Tribal Organizations and those Insular Areas that receive regular LIHEAP block grant allocations of less than \$200,000 will continue to be exempted from most of the reporting requirements. These grantees report only on the number of households assisted by type of LIHEAP assistance through the ***LIHEAP Household Report--Short Format for Assisted Households***.

Initially, OCS sought comments on the renewal of OMB approval of the *LIHEAP Household Report*, as proposed, through the following actions:

- On August 26, 2006, an information collection notice was published in the *Federal Register* (71 FR 50923-50924) requesting comments about the *LIHEAP Household Report* (**Attachment B**).
- On September 7, 2006, OCS sent to all State LIHEAP Directors an e-mail which included the text of the *Federal Register* Notice (**Attachment C**).
- On September 26, 2006, OCS sent LIHEAP AT 06-10 to State LIHEAP Grantees to request comments on the renewal of OMB approval of the *LIHEAP Household Report*, as revised (**Attachment D**).
- On September, 29, 2006, OCS sent an e-mail to the Department of Energy's Weatherization Assistance Program and four national organizations (the National Consumer Action Foundation, National Energy Assistance Directors' Association, National Association for State Community Services Program, and Community Action Partnership) requesting their views about the renewal and proposed changes to the *LIHEAP Household Report* (**Attachment E**).

OCS received comments from five States by the end of the 60 day comment period (October 27, 2006). OCS decided that it needed a wider range of responses and incremental cost estimates for the additional proposed elements. OCS sought the additional information through the following actions:

- On February 9, 2007, OCS sent an e-mail advising State LIHEAP Directors that the proposed additional data elements were on hold. State LIHEAP Directors were requested to assist in developing an estimate of the annual average marginal costs to the States for collecting the additional data (**Attachment F**).
- On February 14, 2007, OCS attended the winter meeting of the National Energy Assistance Directors' Association to discuss the need for OCS to receive additional comments from the States by March 25, 2007.

2. Purpose and Use of the Information Collection

The statutory purpose and use of the information collection is two-fold:

- LIHEAP grantees are required to report the data contained in the previously approved *LIHEAP Household Report* as part of their annual application for LIHEAP funds, as required by Section 2605(c)(1) (G) of the Act (42 U.S.C. 8624 (**Attachment G**)).
- OCS needs to prepare the data on assisted households for inclusion in the Department's *Annual LIHEAP Report to Congress*, as required by Section 2610(a)(4) and (5) and section 2610(b) of the Act (42 U.S.C. 8629 (**Attachment G**)).

Also, the data are used for Congressional oversight and in response to Congressional and White House queries on case load statistics and demographic characteristics of LIHEAP households. Finally, the data on heating assisted households containing at least one member who is elderly or a young child are used in calculating LIHEAP targeting performance measures, and the data on assisted households are used in calculating a LIHEAP efficiency measure under the Government Performance and Results Act (GPRA) of 1993 (31 U.S.C. 1101) and OMB's PART.

3. Use of Information Technology and Burden Reduction

The *LIHEAP Household Report* and instructions are sent by e-mail as an Excel file and Word file to State LIHEAP grantees. Almost 100 percent of the States and the District of Columbia return their reports electronically to OCS.

4. Efforts to Identify Duplication and Use of Similar Information

In the past, States voluntarily participated in OCS' *LIHEAP Grantee Survey* (OMB Control Number 0970-0076) which included an item on States' estimates of households to be assisted during the current fiscal year. However, the estimates did not serve as official counts nor did they provide data required by the statute on income and household demographic characteristics of LIHEAP assisted households. Beginning with the *LIHEAP Grantee Survey for FY 2001*, estimates of LIHEAP assisted households were no longer collected through the Survey.

Household income levels and presence of elderly, disabled, or young children can be estimated at the national and regional levels for the households receiving heating assistance from two national household surveys—the Annual Social and Economic Supplement (ASEC) to the Current Population Survey (conducted by the U.S. Bureau of the Census) and the Residential Energy Consumption Survey (conducted by the U.S. Energy Information Administration). However, national household surveys do not provide reliable State-level data, data on other types of LIHEAP assistance, or data in a timely manner to comply with LIHEAP statutory reporting requirements. Also, these surveys underestimate the number of households receiving heating assistance due to underreporting and sampling error.

There is no other similar information collection that can be modified to provide the data. Also, there is no burdensome or reliable way that OCS can obtain the data from LIHEAP grantees.

5. Impact on Small Businesses or Other Small Entities

No small business entities are involved in the data collection.

6. Consequences of Collection the Information Less Frequently

Without the reinstatement of the annual collection effort that expired on October 31, 2006:

- The deadline for LIHEAP grantees to submit their block grant applications/plans for the following Fiscal Year is September 1st of the current Fiscal Year. Part of the block grant application requires the data reported in the *LIHEAP Household Report*. Consequently, grantees would be unable to comply with statutory requirements in section 2605(c)(1)(D) of the LIHEAP statute (42 U.S.C. 8624(c)(1)(G) and 8629(a)(4), (a)(5), (b), and (c)).
- Without the grantees' annual reporting of the LIHEAP household data, HHS would be unable to complete its annual LIHEAP Report to Congress, as required by section 2610(b) of the LIHEAP statute (42 U.S.C. 8629). Therefore, grantees were instructed to report the data on the last OMB approved *LIHEAP Household Report*. The Report indicated that OMB approval was pending.
- There would be no way for OCS to track annual LIHEAP performance output. OCS also would be unable to obtain data that are necessary in calculating LIHEAP reciprocity targeting and efficiency performance measures that are included in the LIHEAP Improvement Plan, in response to OMB's 2003 PART rating of LIHEAP.

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 1320.5.

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

As indicated above, **Attachment B** includes a copy of the *Federal Register* notice that was published on August 28, 2006), soliciting comments on the information collection prior to submission to OMB, as required by 5 CFR 1320.8(d). OCS also sent a copy of the notice and background information to LIHEAP grantees through LIHEAP Action Transmittal No. 2006-10, dated September 26, 2006 (**Attachment D**). Five States provided comments by the end of the 60-day deadline. As noted above, the comment period

was extended to March 7, 2007 to obtain further comments. Twenty-eight States provided comments by March 7, 2007 (**Attachment H**).

The largest number of comments opposed OCS' proposal to have States report on the number of assisted households having at least one "frail elderly" member (**Attachment I**). Based on the States' comments and suggestions, OCS has dropped this proposed data element due to the impracticality of collecting reliable uniform data on "frail elderly" persons.

The remaining comments deal with OCS' proposal to have States provide: (1) an unduplicated count of assisted households having at least one vulnerable member, by type of LIHEAP assistance (2) and the burden in costs and time in implementing these additional household reporting requirements.

A synopsis of the States' comments and OCS' responses follows below.

Comment	Response
Necessity for Proper Performance and Practical Utility	
An unduplicated count would not enhance the knowledge and assessment of work effort in LIHEAP (MD).	<p>Currently, States are required to provide a separate unduplicated count of the number of assisted households, by type of LIHEAP assistance. A household could be counted once under each type of LIHEAP assistance provided to the household. Given that the largest number of households receives heating assistance, OCS has been limited to measuring the targeting of vulnerable households for heating assistance.</p> <p>An unduplicated count would provide for the measurement of LIHEAP targeting performance for the entire program. It also will increase the accuracy of measuring LIHEAP program output and efficiency that are included in OCS' PART LIHEAP Improvement Plan.</p>
The current data tell the State what it needs to know about the population served by LIHEAP (MN).	An unduplicated count of assisted households across LIHEAP program components can help States to better analyze their LIHEAP administrative costs, as indicated by Maryland below. Furthermore, the current data limit the Federal measurement of LIHEAP targeting program performance nationwide.
The proposed category of "elderly, disabled, or young child" would cause confusion that will interfere with reliable reporting of program statistics on a regular basis. Placing multiple household characteristics in one tabulation field seems likely to result in equivocal data. It would add nothing to the assessment value of the report (TX).	The proposed category involves the additional reporting of existing data. The reporting would involve computer programming, not additional data input by agency staff. Multiple characteristics of households would not be placed in one data field. Instead, households with more than one characteristic would be counted.
Subrecipient agencies already prioritize applicants by "vulnerable" household types reported in the existing LIHEAP Household Report form (TX).	The proposal deals with data collection to measure, in part, the results of a State's efforts in prioritizing vulnerable households.
Accuracy of Burden Estimate	
Initial time investment to collect and the report the data is about 40 hours. After the first year, the additional burden hours for the data are likely to be less than an hour (MN).	Agree that burden hours would decrease after the first year.
There is not enough data to determine accuracy.	The burden estimate is an average, and will vary

Comment	Response
A better estimate may be 50-60 hours (IL).	among LIHEAP grantees.
HHS' estimate of 25 to 30 hours to collect and report the new data is very high (MN).	The estimate of 25 to 30 hours is for the entire report, not just the additional data elements.

Quality, Utility, and Clarity of Information to be Collected

The State can or does collect an unduplicated count of assisted households (FL) (MA) (ME) or will be (DE), and for assisted households having at least one member who is an elderly individual, disabled person or a young child (ME).	These comments indicate that unduplicated households counts for the entire program are feasible.
There is no automated method to collect the data (MD).	As noted above, at least several States indicated that collecting the data will be of little or no problem. OCS could see if State is interested in receiving peer technical assistance on automated data collection.
State operates a four component LIHEAP program. The current reporting structure among 50 subrecipient agencies cannot differentiate a client household assisted under one component who previously received assistance under another component (TX).	OCS acknowledges that collecting unduplicated data is burdensome. However, the benefits outweigh the burden given the increased Federal focus on program performance and accountability.
Proposed new category (elderly, disabled, or young child) is not clearly defined and appears to duplicate existing reporting categories (TX).	<p>As with previous reporting, States will still be required to count separately on elderly as a person 60 years or older, disability as defined by each State, and young child as a person 5 years old or under. The additional requirement would be for States to count vulnerable households for the entire program.</p> <p>Each vulnerable group is counted separately. However, a household can have members that would result in the household being counting under all three categories of vulnerable households. The additional element would count such households once.</p>
Adding "any type of LIHEAP assistance" in order to sum the previous six lines, would yield a meaningless statistic (TX).	OCS will clarify that summing the number of households receiving each type of LIHEAP assistance does not provide an unduplicated count of households receiving any type of LIHEAP assistance. Summing the lines above it would result in a duplicated count to an unknown extent.

Ways to Minimize Respondent Burden

Enable uniform data reporting by a centralized data system provided by HHS (CO).	Each States already receives its own Excel spreadsheet of the <i>LIHEAP Household Report</i> as part of OCS' centralized data collection system.
A reasonable estimate or indicator could be determined when you have the overall unduplicated count and the number and types of benefits provided (FL).	Unsure of how this would work. Actual counts are preferable to estimated counts.
<p>Sufficient time is needed to make significant changes to system/database/applications. A phased-in or delayed approach should be considered (VA) (MA).</p> <p>Information technology changes are not under program's direct control. Compliance would</p>	Agree. The proposed changes would take effect with reporting of the FY 2011 data.

Comment	Response
ultimately depend on the State IT director as to how far down the list it would be relegated in relation to all the other changes and tests they have lined up in their queue. To be safe, the State would need at least one to two year's advance notice (UT).	

Consultations have been sought with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported. On September 26, 2006, OCS sent an e-mail requesting the views of the following organizations, as noted above (**Attachment E**).

- National Association of State and Community Services Programs. Mr. Timothy Warfield (202-624-5865); warfield@nascp.org;
- National Community Action Foundation. Dr. Meg Power, Senior Advisor, (202-842-2092); megpower@ncaf.org;
- National Energy Assistance Directors' Association. Mr. Mark Wolfe, Executive Director (202-237-5199); mwolfe@neada.org;
- Community Action Partnership. Mr. Avril Weisman, Vice President, (202-265-7546); aweisman@communityactionpartnership.com); and
- U.S. Department of Energy's Low Income Weatherization Assistance Program. Mr. Jim Powell, Director, Weatherization Assistance program (202-586-8036); Jim.Powell@ee.doe.gov).

No comments were received from the above organizations by October 27, 2006 (the end of the 60-day comment period). On March 9, 2007, the National Energy Assistance Directors' Association did provide written comments that include a compilation of comments from a number of States (**Attachment J**).

We concluded that the difficulties grantees would have in attempting to assess the number of frail elderly households due to the lack of medical knowledge make such an assessment unrealistic. Therefore, we withdrew our request for an unduplicated count of the elderly, frail elderly and assisted households that receive LIHEAP assistance regardless of the type(s) of assistance received.

9. Explanation of Any Payment or Gift to Respondents.

No payment or gifts to respondents are involved.

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

Estimates of the hour burden of the collection of information are based on the number of LIHEAP grantees (50 States, Puerto Rico, the District of Columbia, 140 Indian Tribes/Tribal, and 4 Insular Areas) completing the information collection annually.

Like OCS's previous OMB clearance submissions of the *LIHEAP Household Report*, the response burden on respondents varies based on the following:

- The *LIHEAP Household Report* for the 50 States, the District of Columbia, and Insular Areas with annual LIHEAP allotments of \$200,000 or more (*i.e.*, the Commonwealth of Puerto Rico) consist of two formats: **LIHEAP Household Report-Long Format for Assisted**

Households: (average burden per respondent of 25 hours for FY 2009 and FY 2010 each and 520 hours for FY 2011)

- **LIHEAP Household Report-Long Format for LIHEAP Applicant Households** (average burden per respondent of 13 hours).
- The *LIHEAP Household Report* for the 140 Indian Tribes/Tribal Organizations and 4 Insular Areas with annual LIHEAP allotments of less than \$200,000 consists of the **LIHEAP Household Report-Short Format for LIHEAP Assisted Households** (average burden per respondent of 1 hour).

The variance in burden is due to the Department waiving most of the reporting requirements for small LIHEAP grantees, given the small grant amounts involved and the overall difficulty in obtaining reliable demographic data from small grantees.

The estimates do not include burden hours for collecting the data on households as such information is customarily needed to determine household eligibility for LIHEAP and/or the amount of LIHEAP benefit provided to LIHEAP recipient households. However, burden hours will be incurred for FY 2011 as States would need to prepare for providing unduplicated household counts.

The estimated response burden is calculated in the same way as the previous information collection (OMB Control Number 0970-0060), but includes an increase in the number of Indian Tribe/Tribal Organization grantees providing each type of LIHEAP assistance.

Annual Burden Estimates for *LIHEAP Household Report for FY 2009* (same for *FY 2010*)

Instrument	Number of Respondents	Number of Responses Per Respondent	Average Burden Per Response	Total Burden Hours
Long Format for Assisted Households	52	1	25	1,300
Long Format for Applicant Households	52	1	13	676
Short Format for Assisted Households	144	1	1	144

Estimated Total Annual Burden Hours for FY 2009 = 2,120

Estimated Total Annual Burden Hours for FY 2010 = 2,120

For FY 2011, States would need to have developed LIHEAP client tracking systems and expand their management information system to collect unduplicated counts of vulnerable LIHEAP household and of LIHEAP households receiving more than one type of LIHEAP assistance. It is estimated that the average burden per response for the LIHEAP Assisted Household Long Format would increase from 25 hours to 520 hours. The burden is expected to decrease significantly after FY 2011 when there would no longer be startup costs associated with the new data elements. To develop the tracking system would be costly.

Annual Burden Estimates for *LIHEAP Household Report for FY 2011*

Instrument	Number of Respondents	Number of Responses Per Respondent	Average Burden Per Response	Total Burden Hours
Long Format for Assisted Households	52	1	520	27,040
Long Format for Applicant Households	52	1	13	676
Short Format for Assisted Households	144	1	1	144

Estimated Total Annual Burden Hours = 27,860

The annual marginal costs for respondents for each format of the *LIHEAP Household Report* are estimated as follows:

- For FY 2009 and FY 2010 each, **LIHEAP Household Report-Long Format for Assisted Households**, OCS estimates that the total annual respondent cost to be \$32,396.

Staff	Number of respondents	Average # hours per respondent	Average \$ per hour	Total cost
50 States, Dist. of Col., & Puerto Rico (52 respondents)				
Reporting	52	17	\$31	\$27,404
Recordkeeping	52	8	\$12	\$4,992
Total		25		\$32,396

- For FY 2011, **LIHEAP Household Report-Long Format for Assisted Households**, OCS estimates that the total annual respondent cost to be \$699,920.

Staff	Number of respondents	Average # hours per respondent	Average \$ per hour	Total cost
50 States, Dist. of Col., & Puerto Rico (52 respondents)				
Reporting	52	380	\$31	\$612,560
Recordkeeping	52	140	\$12	\$87,360
Total		520		\$699,920

Accordingly, the total estimated costs to grantees for FY 2009 - FY 2011 for the **LIHEAP Household Report-Long Format for Assisted Households**, OCS estimates the total annual respondent cost to be \$764,712 ($\$32,396 + \$32,396 + \$699,920 = \$764,712$).

- For FY 2009 – FY 2011 each, OCS estimates that the total annual respondent cost for the **LIHEAP Household Report-Long Format for LIHEAP Applicant Households**, to be \$17,004.

Staff	Number of respondents	Average # hours per respondent	Average \$ per hour	Total cost
50 States, Dist. of Col., & Puerto Rico (52 respondents)				
Reporting	52	9	\$31	\$14,508
Recordkeeping	52	4	\$12	\$2,496
Total		13		\$17,004

Accordingly, the total estimated costs to grantees for FY 2009 - FY 2011 for the **LIHEAP Household Report-Long Format for LIHEAP Applicant Households**, OCS estimates the total annual respondent cost to be \$51,012 ($\$17,004 \times 3 = \$51,012$).

Therefore, the total estimated cost to the grantees affected by the change in format for the **LIHEAP Household Report** is \$ 815,724 ($\$764,712$ for the **LIHEAP Household Report-Long Format for Assisted Households** + $\$51,012$ for the **LIHEAP Household Report-Long Format for LIHEAP Applicant Households**).

- For FY 2008 – FY 2011 each, **LIHEAP Household Report-Short Format for LIHEAP Assisted Households**, OCS estimates the total annual respondent cost to be \$3,096.

Staff	Number of respondents	Average # hours per respondent	Average \$ per hour	Total cost
140 Tribal grantees & 4 insular areas (144 respondents)				
Reporting	144	0.5	\$31	\$2,232
Recordkeeping	144	0.5	\$12	\$864
Total		1.0		\$3,096

Accordingly, the total estimated costs to grantees for FY 2009 - FY 2011 for the **LIHEAP Household Report-Short Format for LIHEAP Assisted Households**, OCS estimates that the total annual respondent cost to be \$9,288 ($\$3,096 \times 3 = \$9,288$).

Hence, we are requesting an estimated annual hour burden of 204 hours ($190 + 13 + 1 = 204$) for the three formats.

After the initial year of the new reporting format for the **LIHEAP Household Report-Long Format for Assisted Households**, the estimated annual number of hours per respondent will decrease from 520 hours to 25 hours due to the implementation of the change in automated systems. Therefore, the estimated annual hour burden for the three formats will return to 39 hours ($25 + 13 + 1$), the amount in the last approved collection.

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

As there would be no changes from the *LIHEAP Household Report for FY 2006* in the *LIHEAP Household Reports* for FY 2009 and FY 2010, the estimated annual cost burden (*i.e.*, the average annual marginal cost) to respondents or record keepers for capital/startup and operation/maintenance is \$0 for each of these two fiscal years (see **Attachment K** for a copy of the *LIHEAP Household Report for FY 2009 and FY 2010*).

The proposed data items for nonduplicated counts deal only with the **LIHEAP Assisted Household--Long Format** of the *LIHEAP Household Report for FY 2011 (Attachment L)*. (Instructions on nonduplicated counts will be developed with input by State LIHEAP agencies.) Additional staff time would be required to track recipient households across various LIHEAP components and to operate computer systems to produce the additional data on nonduplicated counts. States will need to be able track those households that receive different types LIHEAP benefits. In addition, a number of States will either have to use outside contractors to provide the necessary information technology support.

Based on the projection of incremental costs provided by seven States (range of \$5,000 to \$429,600), the average marginal startup costs for 2011 is estimated to be \$12,000 per respondent for the **LIHEAP Assisted Household Long Format** of the *LIHEAP Household Report*. This would result in the total estimated marginal cost of \$624,000 ($\$12,000 \times 52$ respondents – 50 states, the District of Columbia, and the Commonwealth of Puerto Rico). Therefore the total annual cost burden for the **LIHEAP Household Report-Long Format for Assisted Households** is \$624,000.

14. Annualized Cost to the Federal Government

Cost Item	Person Year	Salary	Total
GS-12, step 4: (a) update <i>LIHEAP Household Report</i> and instructions to reflect the current Federal Fiscal Year (b) prepare an Action Transmittal reminding grantees of the reporting requirement, (c) input and edit the data, and (d) follow up with State LIHEAP grantees concerning data edits.	0.17	\$73,455	\$12,486
GS-14, step 8: (a) oversee the collection effort and for prepare statistical tables through Excel spreadsheets and (b) prepare WordPerfect tables with footnotes.	0.13	\$115,713	\$15,043
Copying and mailing an annual Action Transmittal to remind grantees of the reporting requirement. No additional operational expenses will be incurred for equipment, overhead, and printing.			\$200
Grand Total			\$27,729

15. Explanation of Program Changes or Adjustments

There are two adjustments from the previously approved collection:

- The number of Indian Tribe/Tribal Organizations respondents has increased from an average of 132 to 140 Indian Tribes/Tribal Organization
- The average hour burden per response for the ***Household Report–Long Format for Assisted Households*** have increased from 25 hours to 520 hours for FY 2011.

16. Plans for Tabulation and Publication and Project Time Schedule

The results of the information collection are published in the Department's annual *LIHEAP Report to Congress*. State-level data are prepared as tables in Appendix D of the *LIHEAP Report to Congress (Attachment M)*. The aggregation of State-level data is reported in Part III of the *LIHEAP Report to Congress (Attachment N)*. Complex analytical techniques will not be used as national totals, percents, and percent distributions will be tabulated only. Selected results of the information collection also are published as part of the Department's annual Congressional Justification.

The *LIHEAP Household Report*, as amended, would need to be available at least three months before the end of the fiscal year. This would allow grantees time to submit their completed reports as part of their application for LIHEAP funds for the following fiscal year in accordance with 45 CFR 96.10. This regulation establishes September 1st is the deadline for State, Tribal, and Insular Area grantees to submit their block grant applications/plans for the following fiscal year (date established by regulation). Using this date, 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 2009.

Activity	Weeks following OMB approval*
<i>LIHEAP Household Reports</i> reviewed for completeness as part of the LIHEAP grant application process	18
Final household data imputed and edited	83
Final household data checked and edited for consistency with benefit data from <i>LIHEAP Grantee Survey</i>	143
Draft of statistical tables for inclusion in annual LIHEAP Report to Congress – text and appendices	173
Final statistical tables for inclusion in annual LIHEAP Report to Congress	193
Publication of annual LIHEAP Report to Congress**	--

*The *LIHEAP Household Report for FY 2009* would be reviewed for completeness as part of OCS' block grant application/plan review process for FY 2010 LIHEAP funding.

**Publication is dependent upon the Department's clearance process of the annual *LIHEAP Report to Congress*.

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 certifications required by 5 CFR 1320.9.

B. Collection of Information Employing Statistical Methods

The information collection does not employ statistical methods as all LIHEAP grantees must submit the LIHEAP Household Report.

Attachments to LIHEAP Supporting Statement for *LIHEAP Household Report*

- A. *LIHEAP Household Report for FY 2006*
- B. Information Collection Notice published on August 26, 2006 in the *Federal Register* (71 FR 50923-50924) requesting comments about renewal of OMB approval of *LIHEAP Household Report*, as revised
- C. OCS' e-mail to State LIHEAP Directors, dated September 7, 2006, that included the Information Collection Notice, as published in the *Federal Register* on August 26, 2006
- D. LIHEAP AT 06-10, dated September 26, 2006, requesting comments on the renewal of OMB approval of the *LIHEAP Household Report*, as revised
- E. OCS' e-mail to the Department of Energy's Weatherization Assistance Program and four national organizations, dated September 29, 2006, requesting their comments on the proposed changes to the *LIHEAP Household Report*
- F. OCS e-mail, dated February 9, 2007, advising State LIHEAP Directors that the proposed additional data elements were on hold, and requesting State LIHEAP Directors' assistance in developing an estimate of the annual average marginal costs to the States for collecting the additional data
- G. Reporting of LIHEAP household data by:
 - Grantee household data to HHS, as required by section 2605(c)(1)(G) of the LIHEAP statute (42 U.S.C. 8624 and
 - ACF household data to Congress, as required by sections 2610(a)(4), (5), and (b) of the LIHEAP statute (42 U.S.C. 8629.
- H. Written State comments concerning the Information Collection Notice published on August 26, 2006
- I. Issues raised by the States about reporting on frail elderly households and ACF responses to issues
- J. Written State comments compiled by the National Energy Assistance Directors' Association
- K. Proposed *LIHEAP Household Report for FY 2009 and Instructions* and Proposed *LIHEAP Household Report for FY 2010*
- L. Proposed *LIHEAP Household Report for FY 2011*
- M. State-level LIHEAP household data tables for Appendix D of the *LIHEAP Report to Congress for FY 2004*
- N. National-level LIHEAP household data tables for Part III of the *LIHEAP Report to Congress for FY 2004*