

Supporting Statement for Request of OMB Approval
Of the Low Income Home Energy Assistance Program
Residential Energy Assistance Challenge Program (REACH) Model Plan
February 6, 2008

A. Justification.

1. The Low Income Home Energy Assistance Act (LIHEAP) was amended in 1994 (P.L. 103-252) to include the Residential Energy Assistance Challenge Program (REACH). The authority to require applications for REACH funds is contained in Section 2607B(b) (1) of the LIHEAP statute, as amended, in which funds are available "...to States that submit qualifying plans..." and in 2607B(e), which provides elements of REACH plans. Since the first REACH grants were issued, the Office of Community Services administered the REACH Program through the Administration for Children and Families (ACF) competitive discretionary grants process.

However, the LIHEAP program is a block grant and block grant policy established that application and reporting requirements are to be kept to a minimum. Only those elements required by statute and only necessary information for grants issuance and oversight should be requested of LIHEAP grantees. REACH program funds are only available to LIHEAP grantees, and therefore, REACH application requirements should also be kept to a minimum.

The LIHEAP statute in Section 2605(H)(3) requires that a model plan be provided for LIHEAP applications. To be consistent with the model plan requirement for LIHEAP applications and to reduce application requirements, the REACH model plan was developed in the same format as the LIHEAP application (OMB approval 0970-0075).

2. **Purpose and Use of the Information Collection**

The Administration for Children and Families (ACF) intends to use information submitted on the REACH model plan to identify qualified REACH programs for grant issuance.

3. **Use of Information Technology and Burden Reduction**

By only requiring the elements necessary for a REACH application and keeping with LIHEAP block grant policy, ACF is reducing the burden for applying for REACH funds.

Grantees have the option to use their own format.

4. **Efforts to Identify Duplication and Use of Similar Information**

There is no duplication of collection of this data during the fiscal year. The REACH

Model Plan will be used as an annual application for funds, and grantees are required by statute to provide this information. There is no other requirement that States provide this information to us in any other form.

5. Impact on Small Businesses or Other Small Entities

This data collection effort does not involve small businesses. Only States, tribes and insular area governments who are LIHEAP grantees may apply for funds.

6. Consequences of Collecting the Information Less Frequently

The LIHEAP statute provides that a portion of the annual LIHEAP appropriation will be set aside to fund REACH programs. The REACH Model Plan will ensure grantees provide all information necessary to receive REACH funds, and the Federal government will receive the necessary information to determine the best programs to fund.

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

No special circumstances require the form to be collected 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

Notice of the request for OMB approval of the REACH Model Plan was published in the Federal Register and made available for review and comment on November 6, 2007 (Vol. 72 FR 62652) and on January 24, 2008 (Vol. 73 FR 4223). We made the Federal Register notice, instructions for submission of the Model Plan and the proposed REACH Model Plan available to all LIHEAP grantees and persons on our "interested parties" list, and national organizations and requested their comments. None of them voiced any objections to the report.

9. Explanation of Any Payment or Gift to Respondents

There are no payments or gifts associated with this data collection effort.

10. Assurance of Confidentiality Provided to Respondents

There is no assurance of confidentiality that is applicable to this collection.

11. Justification for Sensitive Questions

There are no sensitive questions in this collection.

12. Estimates of Annualized Burden Hours and Costs

The total annual reporting burden for the States, the District of Columbia, and Tribes for this report is estimated to be 3672 hours. The estimated burden represents respondent time needed to review the form and its instructions, prepare responses, and submit the information. There will be 51 respondents submitting reports. We estimate the total average burden to be 72 hours per respondent, resulting in a total respondent burden of 3672 hours.

The breakdown in burden hours is as follows:

ANNUAL BURDEN ESTIMATES
REACH Model Plan

INSTRUMENT	NUMBER OF RESPONDENTS	NUMBER OF RESPONSES PER RESPONDENT	AVERAGE BURDEN HOURS PER RESPONSE	TOTAL BURDEN HOURS
REACH Model Plan	51	1	72	3672

Estimated Total Annual Burden Hours: 3672

The annualized cost to each of the States for responding to the report is estimated to be \$1,800. This was calculated by multiplying the 72 burden hours by \$25, which is the estimated hourly rate of grantee LIHEAP staff involved in responding to the report. The cost for 51 respondents is \$91,800. Therefore, we request an estimated annual hour burden of 3,672 hours.

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

There are also costs associated with or resulting from start-up. We estimate the cost burden to each respondent for start-up to be \$700. Therefore, we request the total annual cost burden of \$35,700 for 51 respondents.

14. Annualized Cost to the Federal Government

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

The approximate cost at a GS-12 level to develop the REACH Model Plan and Action Transmittal, review applications, make recommendations, prepare notification letters and an Information Memorandum identifying acceptable REACH programs is \$25,874.

15. Explanation of Program Changes or Adjustments

The REACH Model Plan will reduce application requirements for the REACH program. It will provide an application that is consistent with the application for LIHEAP funds and consistent with block grant policy to reduce the application and reporting requirements for LIHEAP grantees .

Grantees have the option to use another format.

16. Plans for Tabulation and Publication and Project Time Schedule

The REACH Model Plan and instructions will be published in an Action Transmittal and distributed to LIHEAP grantees annually.

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

The OMB Clearance number and expiration date will be displayed on the form.

18. Exceptions to Certification for Paperwork Reduction Act Submission

There are no exceptions necessary for this data collection effort.

B. Collection of Information Employing Statistical Methods

This report does not employ statistical methods.