#### Supporting Statement Weatherization Assistance Program Evaluation OMB Control Number: 1910-5151

### A. Justification

### 1. <u>Explain the circumstances that make the collection of information necessary.</u> <u>Identify any legal or administrative requirements that necessitate the collection.</u> <u>Attach a copy of the appropriate section of each statute and regulation</u> <u>mandating or authorizing the information collection.</u>

The collection of this information is necessary in order to verify the cost-effective performance of authorized tasks by the Department of Energy's Weatherization Assistance Program, highlight best practices in reaching program objectives, and identify ways in which program performance can be improved. In its Program Assessment Rating Tool (PART) rating for the program, the Office of Management and Budget (OMB) found that:

**"The program lacks an assessment of performance that is current, comprehensive, and independent.** The program reports a favorable benefit-cost ratio through internal assessments. However, these assessments rely in part on old data..."

The last comprehensive evaluation of the program was conducted in 1993 and employed data from the 1989-1990 program year (PY). Many aspects of the program's rules, regulations, administrative structures and program operations have changed since that time and more current statistical assessments are limited in scope and tied to the original evaluation data base. Approval of the emergency ICR has allowed Oak Ridge National Laboratory and its independent evaluation contractor to begin a comprehensive evaluation of the Weatherization Assistance Program. However, additional time is required for data collection; hence this ICR.

Authority to conduct survey and evaluation activity can be found in 10 CFR 440, Section 440.23(a) mandating that the Secretary of Energy shall "...monitor and evaluate the operation of projects carried out by CAA's [community action agencies] receiving financial assistance under this part through on-site inspections, or through other means, in order to ensure the effective provision of weatherization assistance for the dwelling units of low-income persons."

## 2. <u>Indicate how, by whom, and for what purpose the information is to be used.</u> <u>Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.</u>

The information that will be gathered and analyzed through this collection will have multiple audiences. It will be used to inform Congress, the Department, and the

administration of the current state of program performance. Statistics will be used to update and improve PART and Government Performance and Results Act (GPRA) assessments. Results of the study will also be used to identify strengths and weaknesses of program performance in order to target ways in which this can be improved at federal, state, and local implementation levels.

In addition, findings from the previous evaluation that program performance in hotclimate regions was not on par with the national average, the impetus for a hot-climate initiative, which has targeted that region with additional training, technical assistance, and unique weatherization techniques in order to improve performance. It is anticipated that findings from the current evaluation will result in similar adjustments and improvements to the Weatherization Assistance Program.

### 3. <u>Describe whether, and to what extent, the collection of information involves the</u> <u>use of automated, electronic, mechanical, or other technological collection</u> <u>techniques or other forms of information technology, e.g., permitting electronic</u> <u>submission of responses.</u>

It is expected that over 90% of the data collection effort for this study will involve some form of electronic exchange, either through the use of online survey instruments or the transfer of utility billing records or other relevant household data via electronic mail and attached files.

Requesting utility bills and other relevant household data in electronic format will ease the reporting burden of the utilities and local agencies providing the information and will yield information in a form that is easier for the evaluation contractor to process. This approach is expected to reduce the time required by all parties.

### 4. <u>Describe efforts to identify duplication.</u>

There is no similar information available on a national basis. There is no program comparable in scale or scope to the Weatherization Assistance Program and only a comprehensive national evaluation can now provide an accurate picture of this program's operation and performance.

### 5. <u>If the collection of information impacts small businesses or other small entities,</u> <u>describe any methods used to minimize burden.</u>

The information collection is not expected to have a significant economic impact on small businesses or other small entities.

### 6. <u>Describe the consequence to Federal program or policy activities if the collection</u> <u>is not conducted or is conducted less frequently, as well as any technical or legal</u> <u>obstacles to reducing burden.</u>

If the data collection is not allowed to proceed, the program's performance will be increasingly in doubt for policy makers. Most important, managers at the federal, state, and local levels will be deprived of essential information regarding program operations and areas in need of improvement. This information ranges from appropriate client education techniques, best audit methods, and crew training to energy efficiency measures selection and appropriate health and safety techniques for clients and crews. In short, the information is vital to insure that the program delivers effective services to lowincome households with hundreds of millions of federal dollars per annum nearly two decades after the last national program assessment was performed.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines. (a) requiring respondents to report information to the agency more often than quarterly; (b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; (c) requiring respondents to submit more than an original and two copies of any document; (d) requiring respondents to retain records, other than health, medical government contract, grant-in-aid, or tax records, for more than three years; (e) in connection with a statistical survey, that is not designed to product valid and reliable results that can be generalized to the universe of study; (f) requiring the use of statistical data classification that has not been reviewed and approved by OMB; (g) that includes a pledge of confidentially that is not supported by authority established in stature of regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; (h) requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

This information collection will not involve any of the special circumstances itemized in the Specific Instructions for this Supporting Statement.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5CFR 320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken in response to the comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside DOE to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or report.

The Department published a 60-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on June 9, 2010, volume 75, number 110, and page numbers 32750-32751. The notice described the collection and invited

interested parties to submit comments or recommendations regarding the collection. No comments were received.

# 9. <u>Explain any decision to provide any payment or gift to respondents, other than</u> <u>remuneration of contractors or grantees.</u>

No payments will be made to state and local agency respondents for information collection instruments used in this study. Similarly, no payments will be made to those local agencies and utility companies who will be asked for information related to billing records, metering data, and subject identification. Incentives will be provided to households to complete the Occupant Survey and to weatherization staff to complete Part I of the Weatherization Staff Survey.

# **10.** <u>Describe any assurance of confidentiality provided to respondents and the basis</u> <u>for the assurance in statute, regulation, or agency policy.</u>

The information provided by respondents to the surveys and household data requests will be reported only in the aggregate and a subject's name, agency, or other identifying information will not be reported in association with the individual answers. The evaluation contractor selected to perform this study will be required to take appropriate steps to protect the privacy of those agencies and individuals from whom data are collected. Personally identifying information will not be delivered by the evaluation contractor to Oak Ridge National Laboratory or DOE. A key component of this is identifying and addressing potential vulnerabilities in the processes by which electronic data are collected and stored.

11. <u>Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why DOE considers the questions necessary, the specific uses to be made of the information., the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.</u>

No questions of a sensitive nature are included in any of the surveys used in the Weatherization Assistance Program Evaluation.

12. <u>Provide estimates of the hour burden of the collection of information. The</u> <u>statement should indicate the number of respondents, frequency of response,</u> <u>annual hour burden, and an explanation of how the burden was estimated.</u> <u>Unless directed to do so, DOE should not conduct special surveys to obtain</u> <u>information on which to base hour burden estimates. Consultation with a</u> <u>sample fewer than 10 potential respondents is desirable.</u>

An attachment shows the burden estimate for each element of the data collection effort as well as the total burden. Five surveys will be administered to representatives of various populations (states, local agencies, and utilities). In addition, a series of eight data

requests will be made to local agencies and utility companies related to the collection of billing records, metering data, and the identification of study subjects. The abovementioned survey instruments and household data request forms are attached to this submission for OMB review. Data will be collected from 50 states, 900 local weatherization agencies, 1,000 utility companies, 2,285 occupants, and 4013 weatherization staff, for a total of 8248 respondents. This emergency information collection request does not entail any surveys of any households that would take place during the Census embargo of such activities.

It is estimated that the hour burden for all respondents combined will total 74,051 hours over the entire study period. The data collection effort will span two years, from Spring 2010 to late 2012, but each of the individual components shown in the attachment will require less than the entire two year period. Hour burden estimates were prepared separately for each individual data collection effort based on the nature of the information requested, the instrument used, experience with similar data collection efforts in the previous National Weatherization Assistance Program Evaluation, and feedback provided by survey pre-testers.

The estimate of burden hours of the information collection are as follows:

Total number of unduplicated respondents: 8248 Reports filed per person: 1.36 Total annual responses: 11,198 Total annual burden hours: 74,051 hours

Average BurdenPer Collection: 5696 hoursPer Applicants: 9.0 hours

The estimate of annual cost for the information collection WILL BE ZERO:

### 13. <u>Provide an estimate for the total annual cost burden to respondents or</u> <u>recordkeepers resulting from the collection of information.</u>

No costs are anticipated for (a) capital and start-up costs or (b) an operation and maintenance and purchase of services component.

### 14. <u>Provide estimates of annualized cost to the Federal government.</u>

The additional cost for this data collection is \$8.2 million for an independent subcontractor to Oak Ridge National Laboratory to collect the data. The average annual cost for this three-year project is \$2.73 million.

### 15. <u>Explain the reasons for any program changes or adjustments reported in Items</u> <u>13 (or 14) of OMB Form 83-I.</u>

This is a new data collection. There are no program changes or adjustments to be reported.

### 16. <u>For collections whose results will be published, outline the plans for tabulation</u> <u>and publication.</u>

Once the survey information and instrumented/metered data have been collected and analyzed, a series of 9 reports will be written to present the survey information and analysis results. These reports will be published as follows:

- **Program characterization**–A report describing the characteristics of the Program and how it is implemented will be published in December 2010.
- Air and duct sealing and furnace work—A report describing the data collected by agencies on air sealing, duct sealing, furnace tune-ups, and furnace replacements and the results of analyzing these data will be published in March 2011.
- **Submetered heating-energy savings**—Four reports documenting how each of four submetered field tests was performed (single-family homes heated by fuel oil, single-family homes heated by propane, mobile homes heated by propane, and multifamily buildings heated by fuel oil) and the heating energy savings measured under each field test will be published in March 2012.
- **Program energy savings**—A report documenting the billing data energy analyses and the energy savings achieved in the housing units weatherized by the Program in PY 2006 will be published in March 2012.
- **Non-energy impacts**–A report documenting the non-energy impacts that can be attributable to the Program will be published in March 2012.
- **Impact assessment**—A report that draws together the Program characterization, energy savings, and non-energy impact studies along with additional analysis on Program cost effectiveness, explanatory factors, and attribution of energy savings to the Program will be published in September 2012.
- **Process assessment**–A report that documents findings on how well the Program is being implemented, with a special focus on audits, client education, training, and monitoring, will be published in September 2012.
- **Submetered air-conditioning electricity savings**–A report documenting how the air-conditioning field test was performed, the air-conditioning electricity use of Program houses, and the electricity savings measured under the field test will be published in September 2012.
- **Synthesis**–A report that draws together all the findings presented in the previous reports and provides recommendations for Program improvement will be published in December 2012.

# 17. <u>If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.</u>

Not seeking approval not to display the expiration date for OMB. Expiration date display is not inappropriate.

### 18. <u>Explain each exception to the certification statement identified in Item 19 of</u> <u>OMB Form 83-I.</u>

No exceptions are being requested to the certification requirements.