

**Supporting Statement for Information Collection Approval of the  
Extension of the Low Income Home Energy Assistance Program  
(LIHEAP) Model Plan**

(OMB Control Number 0970-0075)

November, 2010

**A. Justification**

**1. Circumstances Making the Collection of Information Necessary**

The Low Income Home Energy Assistance Program (LIHEAP) statute, U.S.C. 8624, requires that as part of the annual application required for the receipt of Federal funds to administer a LIHEAP program, each grantee must provide specific information in its State plan. Grantees may use any format they wish to submit the information. However, the statute requires the U.S. Department of Health and Human Services (HHS) to distribute a model plan format to grantees each year.

Under prior guidance, the Chief Executive Officer in States, Tribes or Territories is required to certify in the LIHEAP State Plan that the grantee will uphold all rules, regulations, and policies associated with the LIHEAP program. As cited above, grantees must have in place policies that address waste, fraud and abuse.

Presidential Executive Order 13520, reducing Improper Payments and Eliminating Waste in Federal Programs, issued in November 2009, encourages Federal agencies to take deliberate and immediate action to eliminate fraud and improper payments. As part of the review of programs subsequent to this executive order, HHS has determined that additional information from each administering agency is necessary to assess grantee measures that are in place to prevent, detect or address waste, fraud and abuse in LIHEAP programs.

The Administration for Children and Families (ACF) is requesting the Office of Management and Budget (OMB) to authorize its information collection clearance of the LIHEAP Program Integrity Assessment Supplement.

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

The data are reviewed by the Division of Energy Assistance (DEA), Office of Community Services, to determine whether grantees have submitted a complete application for Federal funds. An application consists of two parts - certification to 16 assurances and a plan describing how several of the assurances will be implemented, along with other information, as described in section 2605(c) of the statute. Submission of a complete application is a prerequisite to receiving Federal funds to administer a LIHEAP program. Most grantees use the model

plan format, which reduces the burden on the grantee, speeds the HHS review process and makes faster issuance of grant awards possible.

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

We significantly reduced the burden, effective with Fiscal Year (FY) 1998 applications, by developing an abbreviated plan that grantees may use in two of every three years. The Division of Energy Assistance makes the LIHEAP Model Plan available to grantees for downloading from the ACF web site. We make the forms electronically through e-mailing them to grantees.

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

There is no similar source of information used which can be modified for the purpose of collecting required State plan information for the Low Income Home Energy Assistance Program from one year to the next.

**5. Impact on Small Businesses or Other Small Entities**

This model plan format does not involve small entities as defined by OMB. Only States, Territories, Tribes and Tribal Organizations are affected.

**6. Consequences of Collecting the Information Less Frequently**

The information requirements are an annual activity which is required by law for the receipt of Federal block grant funds. Under the LIHEAP statute, we must make a Model Plan available to grantees. It provides grantees an optional management tool that may alleviate the burden of preparing additional information to complete plans. This model encompasses the content of the information statutorily required for a complete plan. Without this information collection, we would not be able to issue grants.

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

There is no circumstance that requires the information to be provided, or the model plan format to be used, in a manner inconsistent with the guidelines in 5 CFR 1320.6.

**8. Comments in Response to the *Federal Register* Notice/Outside Consultation**

The Program Integrity Assessment Supplement that was approved by OMB through emergency clearance that expires on December 31, 2010 was sent out to

grantees for submission for with the applications for funding for Fiscal Year 2011 that was due on September 1. Notice of the request for OMB approval of information collection for the LIHEAP application requirements/Model Plan and the LIHEAP Program Integrity Assessment Supplement was published in a 60-day notice published in the Federal Register on May 17, 2010 (75 FR 27560).

The only comments that we received were technical ones concerning the Program Integrity Assessment Supplement. Grantees commented that the items requesting information from States did not make it clear that Tribes are also expected to respond. Therefore, we made the technical change to replace the word “States” with “grantees.”

Additionally, grantees commented that the phrase “\* please provide full descriptions of the State's plans and strategy in this area, and attach/reference excerpts from relevant policy documents” included in the first column of each item caused confusion concerning whether grantees were to include a response in those cells. Therefore, we moved a single mention of the statement to the beginning of the form.

There has been a change in the substance of this collection activity since the activity was last approved in order to add the LIHEAP Program Integrity Assessment Supplement. However, the LIHEAP Program Integrity Assessment Supplement received OMB approval on an emergency basis until December 31, 2010. Since the most recent approval, we have made only formatting changes.

**9. Explanation of Any Payment/Gift to Respondents**

There is no payment or gift involved other than awarding funds based on complete plans.

**10. Assurance of Confidentiality Provided to Respondents**

There is no assurance of confidentiality that is applicable to this information collection or Model Plan.

**11. Justification for Sensitive Questions**

There are no sensitive questions contained in the information required or Model Plan.

**12. Estimates of Annualized Hours and Cost Burden**

If all current grantees choose to apply for funds, there will be approximately 216 respondents. If the Detailed Model Plan is used, we estimate that it will take each respondent 1 hour to complete; if the Abbreviated Model Plan is used, we estimate 20 minutes per response. The LIHEAP Program Integrity Assessment Supplement will take an additional hour to complete. This includes the time for reviewing previous applications, gathering the data needed, reviewing the completed application, and assessing monitoring procedures. Because the Model Plan is so simple to use, and has been so well received by grantees, we expect virtually all respondents to use the model plan format. The LIHEAP Program Integrity Assessment Supplement will add an additional 216 hours to the respondent burden due to 1 hour per each of the 216 respondents. This means that the total respondent burden is 335.5 hours.

The current OMB inventory for this collection is 283 hours. OMB approval for the current information collection expires on December 31, 2010, approval number 0970-0075.

The breakdown in burden hours is as follows:

Estimated Annualized Burden Hours

INSTRUMENT	NUMBER OF RESPONDENTS	NUMBER OF RESPONSES PER RESPONDENT	AVERAGE BURDEN HOURS PER RESPONSE	TOTAL BURDEN HOURS
DETAILED MODEL PLAN	72	1	1	72
ABBREVIATED MODEL PLAN	144	1	.33 (20 MINUTES)	47.5
LIHEAP Program Integrity Assessment Supplement	216	1	1	216

Estimated Total Annual Burden Hours:

335.5

**13. Estimates of Other Total Annual Cost Burden to Respondents and Record Keepers/Capital Costs**

If the Detailed Model Plan is used, we estimate that it will take one hour to complete. Because the Model Plan is available electronically, and much of the plan only calls for check marks at appropriate places, we expect that the entire task would be performed by a professional staff member at a cost of \$26.60 for one hour's work. The total cost for the 72 respondents we estimate would use the Detailed Model Plan each year would be \$1,915.20 (72 x \$26.60).

If the Abbreviated Model Plan is used, we estimate it will take 20 minutes per response including the time for reviewing previous applications, gathering the data needed and reviewing the completed plan. We estimate the cost, based on an hourly labor cost of \$26.60, to be \$1,264.03 (.33 x \$26.60 x 144 respondents).

If the model format for the LIHEAP Program Integrity Assessment Supplement is used, we estimate that it will take one hour to complete. We expect that the entire task would be performed by a professional staff member at a cost of \$26.60 for one hour's work. The total cost for the 216 respondents we estimate would use the LIHEAP Program Integrity Assessment Supplement each year would be \$5,745.60 (216 x \$26.60).

There are no additional annual direct costs to respondents as a result of this information collection.

#### **14. Annualized Cost to the Federal Government**

Based on our experience in administering the LIHEAP program, we estimate that it takes an average total of four hours for Federal staff to review each Detailed Model Plan and make any necessary follow-up contacts with grantees to obtain additional information. We estimate that it will take an average of 1.5 hours to review each Abbreviated Model Plan and make any necessary follow-up contacts with grantees. Additionally, we estimate that it will take an average of one hour to review the Program Integrity Assessment Supplement.

A GS-13 employee generally reviews each report and a GS 13 may also do a second review. A GS-14 or GS-15 employee generally makes final decisions when there are questions about the adequacy of information. At an average salary rate of \$30 per hour, assuming four hours each for 72 applications and 1.5 hours each for 144 applications, and one hour each for 216 assessments, the Federal salary costs each year will be about \$19,455 ([4 hours x 72 applications] + [1.5 hours x 144 applications] + [1 hour x 216 applications] x \$30).

#### **15. Explanation of Program Changes or Adjustments**

There has been program change resulting from the addition of the LIHEAP

Program Integrity Assessment Supplement which added 36 hours from the previous request. In addition, there was an adjustment which added 16.5 hours for a total request of 335.5 hours.

**16. Plans for Tabulation and Publication and Project Time Schedule**

The results of the information collection and Model Plan will not be published.

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

The OMB approval number and expiration date will be clearly displayed on the front page of the Model Plan and action transmittals relating to application requirements. The information required in section 1320.8(3) in the regulations for the Paperwork Reduction Act also will be displayed on the front page of the document.

**18. Exceptions to Certification for Paperwork Reduction Act Submission**

There are no exceptions necessary for this information collection.

**B. Collection of Information Employing Statistical Methods**

This information collection does not employ statistical methods.