Supporting Statement for Information Collection Approval of the Extension of the Low Income Home Energy Assistance Program (LIHEAP) Grantee Survey

(OMB Control Number 0970-0076) November 2010

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. This section also requires the Secretary to submit to Congress each fiscal year a report on the data collected, how States carry out certain requirements, the impact of each State's program on recipient and eligible households, and 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 of 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, average LIHEAP household benefits, and maximum annual income cutoffs for 4-person households for LIHEAP. Both the aggregated and State-specific data are included in the Secretary's annual *LIHEAP Report to Congress*. 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 LIHEAP Action Transmittal (AT). The Survey is also 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/ocs/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*, 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 3/20/10, an information collection notice was published in the *Federal Register* (75 FR 15438) requesting comments and suggestions about the *LIHEAP Grantee Survey*.
- On 04/02/10, 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* through LIHEAP AT number LIHEAP-AT-2010-5
- The Transmittal was also posted on OCS' LIHEAP web site at: http://www.acf.hhs.gov/programs/ocs/liheap/guidance/action_transmittals/at10-05.html

No one expressed any objections or submitted any comments.

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 February 28, 2011. 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 monetized cost is 178.50 hours times \$50 or \$8,925.

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

There are no other costs to respondents or record keepers.

14. Estimates of Annualized Cost to the Federal Government

The estimated Federal cost of this information collection totals to \$30,850, based on the following calculations:

Cost Item	Person Year	Salary	Total
GS-13 – (1) prepares an Action Transmittal to instruct State LIHEAP Grantees on completion of the reporting requirement, (2) follow up with grantees concerning report submission and data clarifications, and (3) input, tabulate, and edit the data.	0.25	\$89,033	\$ 22,258

Cost Item	Person Year	Salary	Total
GS-14 updates Survey and instructions, (2) prepares individualized Surveys for the States, and (3) oversees the collection effort and prepares statistical tables, footnotes, and text for the annual LIHEAP Report to Congress.	0.08	\$105,211	\$8,417
Xeroxing and mailing an annual AT to instruct grantees to complete the Survey. No additional operational expenses will be incurred for equipment			\$175
Grand Total			\$30,850

15. Explanation for Program Changes or Adjustments

There are no program changes or adjustments 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 Appendix C of the *LIHEAP Report to Congress* and the aggregation of the State-level data will be reported in Appendix I of the report. 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 2010.

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 inputed and edited	16	
Statistical tables prepared	18	
Footnotes and text prepared	19	
Tables, footnotes, and text integrated in the annual LIHEAP Report to Congress	30	

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

The OMB Expiration date will be displayed on the form.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

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

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.