

**Supporting Statement for Request of Information Collection Approval
Of the Low Income Home Energy Assistance
(LIHEAP) Household Report
(OMB Control Number 0970-0060)
June, 2011**

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. 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.

The LIHEAP statute requires the collection of data on the number of households assisted and their income levels, by type of LIHEAP assistance, for inclusion in the Secretary's annual *LIHEAP Report to Congress*. 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.

OCS requests that OMB approval of the *LIHEAP Household Report* be extended from FY 2012 through FY 2014 without any changes to include an unduplicated count of the number of:

- Assisted and applicant households, by type of LIHEAP assistance;
- Assisted and applicant households, by type of LIHEAP assistance and poverty level;
- Assisted households, regardless of the type(s) of LIHEAP assistance;
- Assisted households, by type of LIHEAP assistance, having at least one vulnerable member broken out by a person at least 60 years or younger, disabled person, or a child five years older or younger.
- Assisted households, by type of LIHEAP assistance, with least one member age 2 years or under;
- Assisted households, by type of LIHEAP assistance, with at least one member ages 3 years through 5 years; and.
- Assisted households, regardless of the type(s) of LIHEAP assistance, having at least one member 60 years or older, disabled, or five years old or younger;

Insular areas (other than the Commonwealth of Puerto Rico) and Indian Tribal Grantees are required to submit data only on the number of households receiving heating, cooling, energy crisis, or weatherization benefits.

2. Purpose and Use of the Information Collection

The statutory purpose and use of the information collection include the following:

- 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).
- OCS prepares 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). 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 reciprocity targeting performance measures, under the Government Performance and Results Act (GPRA) of 1993 (31 U.S.C. 1101) and the President's annual Congressional Justification.

3. Use of Information Technology and Burden Reduction

The *LIHEAP Household Report* (Excel file), instructions (Word file), and Action Transmittal (Word file) are sent by e-mail to State LIHEAP grantees. The files are also made available on the Federal LIHEAP website at:

www.acf.hhs.gov/programs/ocs/liheap/grantees/forms.html#household_report.

All States and the District of Columbia return their reports by e-mail to OCS.

4. Efforts to Identify Duplication and Use of Similar Information

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.

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**

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 annual fiscal year data that are 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)) if the data were collected less frequently.

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).

There would be no way for OCS to track annual LIHEAP performance output.

Finally, 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 President's annual Congressional Justification.

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**

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

- On May 4, 2011, a notice was published in the *Federal Register* (76 FR 25356) requesting comments about the *LIHEAP Household Report*.
- We posted a copy of the *Federal Register* notice on the LIHEAP website to request comments.

No comments were received by the end of the comment period.

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 that are commonly considered private.

12. Estimates of Annualized Hours and Cost Burden

Estimates of the hour burden of the collection of information are based on the number of LIHEAP grantees (50 States, the District of Columbia, 160 Indian Tribes/Tribal Organizations, and four 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 the Commonwealth of Puerto Rico) consist of two formats: *LIHEAP Household Report–Long Format for Assisted Households*: (average burden per respondent of 25 hours) and
- *LIHEAP Household Report–Long Format for LIHEAP Applicant Households* (average burden per respondent of 13 hours).
- The *LIHEAP Household Report* for the 160 Indian Tribes/Tribal Organizations and four Insular Areas consists of the *LIHEAP Household Report–Short Format for LIHEAP Assisted Households* (average burden per respondent of 1 hour).

Annual Burden Estimates for *LIHEAP Household Report*

Instrument	Number of Respondents	Number of Responses	Average Burden Per	Total Burden
Long Format for Assisted Households	52	1	25	1,300
Long Format for Applicant Households	52	1	13	676
Short Format for Assisted Households	164	1	1	164

Total Annual Burden Hours

2,140

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. In reducing the burden on small LIHEAP grantees, all Indian Tribes and Tribal Organizations and four Insular Areas 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*.

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. We are requesting an estimated annual hour burden of 39 hours (25 + 13 + 1 = 39) for the three formats.

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

- For the *LIHEAP Household Report–Long Format for Assisted Households*, OCS estimates that the total annual respondent cost to be \$2,860.

Staff	Number of Respondents	Average \$ per hour	Total Cost
Reporting	52	\$40	\$2,080
Recordkeeping	52	\$15	\$780
Total	52	\$55	\$2,860

- For the *LIHEAP Household Report–Long Format for LIHEAP Applicant Households*, OCS estimates that the total annual respondent cost for to be \$2,860.

Staff	Number of Respondents	Average \$ per hour	Total Cost
Reporting	52	\$40	\$2,080
Recordkeeping	52	\$15	\$780
Total	52	\$55	\$2,860

- For the *LIHEAP Household Report–Short Format for LIHEAP Assisted Households*, OCS estimates the total annual respondent cost to be \$9,020.

Staff	Number of Respondents	Average \$ per hour	Total Cost
Reporting	164	\$40	\$6,560
Recordkeeping	164	\$15	\$2,460
Total	164	\$55	\$9,020

Since the initial year of a revised reporting format for the *LIHEAP Household Report–Long Format for Assisted Households* transpired during the previously approved period for this

information collection, the estimated annual number of hours per respondent decreased from 520 hours to 25 hours due to the implementation of the change in automated systems for FY 2011. Therefore, the estimated annual hour burden for the three formats returned to 39 hours (25 + 13+1) for the current request that covers the *LIHEAP Household Reports* for FY 2012 through FY 2014.

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

As there would be no changes for the *LIHEAP Household Report*, 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.

14. Annualized Cost to the Federal Government

Cost Item	Person Year	Salary	Total
GS-12: (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	\$84,855	\$14,425
GS-14: (a) oversee the collection effort and prepare statistical tables through Excel spreadsheets and (b) prepare tables with footnotes.	0.13	\$133,264	\$17,324
Total			\$31,749

15. Explanation of Program Changes or Adjustments

There are three adjustments from the previously approved collection:

- The number of Indian Tribe/Tribal Organizations respondents has increased from 140 to 160 Indian Tribes/Tribal Organization
- The average hour burden per response for the *Household Report–Long Format for Assisted Households* has decreased from 520 hours to 25 hours.
- The cost burden is reduced to zero because of a previous incorrect estimation.

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 Part III of the *LIHEAP Report to Congress*. The aggregation of State-level data also is reported in Part III of the *LIHEAP Report to Congress*. 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* needs 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 as the deadline for State, Tribal, and Insular Area grantees to submit their block grant applications/plans for the following fiscal year. 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 2012.

Activity	Weeks following OMB approval [†]
<i>LIHEAP Household Reports</i> reviewed for completeness as part of the LIHEAP grant application process. (Household data can be estimated so as not to delay issuance of new grant awards.)*	18
Final (non-estimated) household data input 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 2012* would be reviewed for completeness as part of OCS' block grant application/plan review process for FY 2013 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

- A. The information collection does not employ statistical methods.