

**Supporting Statement for Request of Information Collection Approval  
of the Low Income Home Energy Assistance Program Grantee Needs Assessment  
December 2, 2013**

**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 U.S. Department of Health and Human Services' Administration for Children and Families (ACF) administers LIHEAP at the Federal level. Section 2610(b)(2) of the Low Income Home Energy Assistance Act of 1981 (42 U.S.C. §8629(b)(2)) requires that HHS annually report to Congress on the impact LIHEAP is making on recipient households (see Attachment 1 for full statutory language).

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

This information collection is a direct response to recommendations for strengthening LIHEAP program integrity made by the Government Accountability Office in 2010 and the LIHEAP Program Integrity Work Group, which consisted of a sample of LIHEAP grantees. The purpose of this data collection is to gauge the capacity of LIHEAP grantees to perform two critical tasks.

1. To implement third-party verification of household data obtained during the LIHEAP intake process, in order to strengthen program integrity by reducing the risk of making LIHEAP benefit payments to ineligible households or in the wrong amount. These risks arise in large part when there are errors or fraud in the reporting of household members' identity and income during the LIHEAP intake process.
2. To collect and report new performance measures that ACF is proposing to require of all State LIHEAP grantees by Fiscal Year 2015.

The data that will be obtained through this needs assessment is a one-time collection to inform ACF in its operational decision-making over how to distribute training and technical assistance, and other capacity building resources to its directly-funded LIHEAP grantees. The data will be for confidential use by ACF and its contractors for this internal purpose only. Currently, there is very limited data available on a national scale to provide program administrators and stakeholders information on the impact of LIHEAP services and the effectiveness of how the program is administered. The data that will be collected through this needs assessment will inform ACF as to how to help LIHEAP grantees improve the timeliness and accuracy of their data collection and reporting which will in turn provide better feedback to ACF and national stakeholders about the program's performance.

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

This needs assessment will be administered using an online questionnaire. The questionnaire

will be broken into sections, so that the LIHEAP coordinator for each respondent can effectively delegate the responsibility of answering particular sections to the relevant experts in their organization. In addition, the questionnaire will be programmed with skip patterns that will automatically bypass non-applicable questions, based on the grantee's responses to prior questions.

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

This needs assessment represents a unique set of data to analyze capacity of LIHEAP grantees to perform very specific tasks. No similar information exists that could be used in place of this needs assessment. This determination was made due to the vast experience of program staff and in consultation with our private-sector contractors, Applied Public Policy Research Institute for Study and Evaluation and the National Energy Assistance Directors Association.

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

This information collection represents no impact on small businesses or other small entities. Respondents to this information collection are solely State, Territory, or Tribal government employees.

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

This is a one-time data collection. It would be impossible to collect this information any less frequently.

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

No special circumstances apply to this data collection.

#### **8. Comments in Response to the *Federal Register* Notice and Efforts to Consult Outside the Agency**

As this is a request for emergency review, no prior federal register notice was published and thus, no comments have been collected.

This survey was designed based on the feedback and consultation of the following people:

- David Carroll, Managing Director, Policy Research Institute for Study and Evaluation
- Mark Wolfe, Executive Director, National Energy Assistance Directors Association
- Melissa Torgerson, Owner, Verve Associates LLC
- Jean Amison, LIHEAP Coordinator, Florida Department of Economic Opportunity
- John Harvanko, LIHEAP Coordinator, Minnesota Department of Commerce
- Heather Jones, LIHEAP Coordinator, Missouri Department of Social Services
- Paula Jones, LIHEAP Coordinator, New York Office of Temporary and Disability Assistance
- Randall Hunt, LIHEAP Coordinator, Ohio Department of Development
- Cathy Buhrig, LIHEAP Coordinator, Pennsylvania Department of Public Welfare

- Michael DeYoung, LIHEAP Coordinator, Texas Department of Housing and Community Affairs
- Patrick Strickland, LIHEAP Coordinator, Tribal Council of the Lumbee Nation
- Karl Muhammed, LIHEAP Coordinator, Washing, DC District Department of the Environment

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

No payments or gifts of any kind will be provided to respondents.

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

We will protect your information to the extent allowed by Federal law.

**11. Justification for Sensitive Questions**

No sensitive questions are asked in this data collection.

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

Burden estimates were determined based on consultation with 9 potential respondents to this needs assessment. Each section of the assessment was tested to gauge burden estimates, as well as the respondent’s ability to readily understand the questions and provide a proper response.

Annual Burden Estimates for *LIHEAP Household Report*

Instrument	Number of Respondents	Number of Responses Per Respondent	Average Hour Burden Per Response	Total Burden Hours
Grantee Needs Assessment	52	1	1 hour 40 minutes	86 hours 40 minutes

Total Annual Burden Hours: 86 hours 40 minutes

The total annual cost to all respondents is estimated at \$2,511.60. This estimate is based on the assumption that the average salary of the LIHEAP program coordinator is equivalent to the GS-12 step 1 annual pay rate of \$60,274.

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

This data collection is a one-time needs assessment and requires no recordkeeping that would result in any other additional costs.

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

This one-time needs assessment is designed, administered, and the resulting data analyzed by non-federal contract staff, under two ACF contracts. Based on the budget estimates submitted by both contractors for the performance of this task, the total costs are as indicated in the below table.

Contract	Number of Hours	Rate	Total Cost
Third-Party Accountability Contract	120 hours	\$54.82/hr	\$6,578.40
Web-based Data Collection Contract	484.5 hours	\$109.74/hr	\$53,171.00
Grant Total:			\$59,749.40

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

This is a new project.

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

The results of this data collection will not be published.

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

Non-applicable.

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

None.

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

The purpose of the LIHEAP Grantee Capacity Questionnaire is to develop a complete understanding of the number of grantees needing assistance in order to deliver targeted assistance to them. Since feedback is required from all grantees in order to identify those who need this assistance, each of the 51 LIHEAP State Grantees is included in the respondent universe for this data collection effort. Statistical methods will not be used in the administration

of this needs assessment. It is a census of some grantees for which inferences will only be made about this universe of respondents. Therefore, it does not require use of any statistical methodology.

Two pretests were conducted. The first pretest was completed by members of the project team to confirm that the questionnaire functioned as intended. The second pretest was conducted among a select group of State LIHEAP Directors to ensure that the protocol and questions were clear and unambiguous. Findings from these pretests were incorporated into the final questionnaire.

An online questionnaire is employed to improve response to this self-administered questionnaire. The online questionnaire is programmed to show only questions that are applicable to each grantee, and to allow each respondent to enter their data directly into the program, where data is stored automatically. Furthermore, each LIHEAP Director has the ability to forward individual sections of the questionnaire to the most appropriate respondent(s) within their organization. Based on response rates for similar information collections of the same universe by external stakeholders (such as the National Energy Directors' Association), we anticipate a response rate of approximately 95 percent.

Prior to launching this project, each Grantee will receive an advance communication outlining the objectives of this data collection request as well as instructions for completing the questionnaire. The advance communication will include a deadline for completion of this task. Periodic reminders will be emailed to non-responding Grantees with the final request for participation coming from the Office of Community Services (OCS).

Members of the project team will follow up with grantees to collect missing data or confirm inconsistent responses.

In addition to federal staff, listed below are the contractor(s), grantee(s) or other person(s) who will actually collect and/or analyze this information:

- David Carroll, APPRISE Incorporated
- Ferit Ucar, APPRISE Incorporated
- Melissa Torgerson, Verve Associates LLC
- Cassandra Lovejoy, National Energy Assistance Directors' Association (NEADA)
- Ron Garnett, NEADA consultant
- Wendy Bailey-Hooks, Business Operations Specialist, Georgia Department of Human Services;
- Amanda Baker, Financial Specialist, Michigan Department of Human Services;
- Jane Blank, Lead WHEAP Admin Review Monitor, Division of Energy Services, Wisconsin Home Energy Plus Bureau;
- Sylmia Britt, LIHEAP Coordinator, California Department of Community Services and Development;
- Cari Crittenden, Program Field Representative, Oklahoma Department of Human Services;
- Taura Edwards, Energy Assistance Program Manager, Indiana Housing and Community Development Authority;
- Heather Jones, LIHEAP Manager, Department of Social Services;  
Kimberly Keilen, Director, Family Services Division, Michigan Department of Human Services;
- Jennifer Lee, Alabama Department of Economic and Community Affairs;

- Leslie Lee, Energy Program Manager, Delaware Department of Health and Social Services;
- Marcia Lemon, Program Officer, Montana Department of Public Health and Human Services;
- Susan Marshall, LIHEAP Program Coordinator, Alaska Department of Health and Social Services;
- Akm M. Rahman, Senior Information & Program Coordinator, Massachusetts Department of Housing and Community Development;
- Michael Schmitz, Program Evaluation & Capacity Development Specialist, Minnesota Department of Commerce; and
- Jenni Sullivan, Project Manager, Northrop Grumman *under contract to* Montana Department of Public Health and Human Services.

**Attachment 1**

**Section 2610 of the Low-Income Home Energy Assistance Act of 1981 (Title XXVI of the Omnibus Budget Reconciliation Act of 1981, Public Law 97-35, as amended)**

(a) The Secretary, after consultation with the Secretary of Energy, shall provide for the collection of data, including--

- (1) information concerning home energy consumption;
- (2) the amount, cost and type of fuels used for households eligible for assistance under this title;
- (3) the type of fuel used by various income groups;
- (4) the number and income levels of households assisted by this title;
- (5) the number of households which received such assistance and include one or more individuals who are 60 years or older or disabled or include young children; and
- (6) any other information which the Secretary determines to be reasonably necessary to carry out the provisions of this title. Nothing in this subsection may be construed to require the Secretary to collect data which has been collected and made available to the Secretary by any other agency of the Federal Government.

(b) The Secretary shall, no later than June 30 of each fiscal year, submit a report to the Congress containing a detailed compilation of the data under subsection (a) with respect to the prior fiscal year, and a report that describes for the prior fiscal year--

- (1) the manner in which States carry out the requirements of clauses (2), (5), (8), and (15) of section 2605(b); and
- (2) the impact of each State's program on recipient and eligible households.