

**U.S. Department of Energy**  
**Supporting Statement:**  
**Energy Efficiency and Conservation Block Grant Program**  
**OMB Control Number 1910-5150**

**1. Explain the circumstances that make the collection of information necessary.**

The Department of Energy (DOE) requires collection of information for the Energy Efficiency and Conservation Block Grant (EECBG) Program, as set forth in Funding Opportunity Announcement DE-FOA-0000013 Attachment C, the Energy Independence and Security Act of 2007 (P.L. 110-140). This collection also meets the Office of Management and Budget (OMB) requirements for (1) grant and financial administration, and (2) American Recovery and Reinvestment Act of 2009 (ARRA or Recovery Act; Pub. L. No. 111-5) funds. EECBG is authorized under the Energy Policy and Conservation Act, as amended (42 U.S.C. 6321 et seq.).

DOE provides Federal financial assistance and technical support to state and local governments and tribal nations under Energy Independence and Security Act of 2007 (EISA). Information gathered provides current data required to respond to OMB, congressional and consumer requests and budget preparation.

EECBG is a Program with \$3.2 billion under management to be expended by September 2013. Of the \$3.2 billion allocated to EECBG, \$2.7 billion has been apportioned to states, territories, tribes, and units of local government through a formula distribution based on population. These funds are intended to help expand local energy efficiency efforts and reduce energy use in the transportation, building and other appropriate sectors. The remaining EECBG funds have been allocated via two competitive programs referred to as EECBG Competitive Topic 1 and EECBG Competitive Topic 2.

- EECBG Competitive (Topic 1) - \$390 million: The Better Buildings Neighborhood Program (formerly Retrofit Ramp-up) which supports innovative programs that are structured to provide whole-neighborhood building energy retrofits. Twenty-five recipients have been awarded funding under EECBG Competitive Topic One (Topic 1).
- EECBG Competitive (Topic 2) - \$64 million: The General Innovation Fund which supports cities, counties and state-recognized Indian Tribes that were not eligible to receive population-based formula grant allocations from DOE under the Energy Efficiency and Conservation Block Grant Program. These funds are intended to help expand local energy efficiency efforts and reduce energy use in the transportation, building and other appropriate sectors. There are 20 recipients that have been awarded funding under EECBG Competitive Topic Two (Topic 2).

For the purposes of administration, nine EECBG Competitive Topic 2 recipients are administered by the Building Technologies Program in conjunction with the EECBG Competitive Topic 1 in the Better Buildings Neighborhood Program. The remaining 11 EECBG

Competitive Topic 2 recipients are administered by the Weatherization and Intergovernmental Program.

As such, some EECBG Competitive Topic 2 recipients will report pursuant to the requirements of the Building Technologies Program while the remainder will report pursuant to the requirements of the Weatherization and Intergovernmental Program. The distinction in reporting burden for Topic 2 recipients is made clearly in the responses below.

Many of the grant recipients are unfamiliar with the provisions surrounding the expenditure of Federal funds and the vast majority has not had a pre-existing professional relationship with DOE. The size and pace of EECBG Program execution create an urgent need for DOE to collect certain information on a quarterly basis in order to adequately monitor, report, and ensure transparency and accountability.

**2. Indicate how, by whom, and for what purpose the information is to be used.**

The information collected is used by program staff to track the recipients' activities, monitor their progress, and assess grant fund expenditures. The information also enables program staff to provide required or requested information on program activities to OMB, Congress and the public. This is an important component to demonstrating the impact and success of the EECBG program.

The Better Buildings Neighborhood Program is funding numerous test-pilots to understand what works and what does not work in bringing effective energy efficiency programs to scale. Therefore, the Better Buildings Neighborhood Program will use this data to roughly identify best practices and lessons learned on a continuous basis to improve program management. These results are not final and are part of a larger, more robust, retrospective evaluation to be conducted near the end of the program.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.**

All EECBG Formula recipients and the 11 EECBG Competitive Topic 2 recipients administered by the Weatherization and Intergovernmental Program report through the online database Performance and Accountability for Grants in Energy (PAGE). PAGE provides all EECBG recipients with the ability to electronically submit and manage grant performance and financial information. This online system allows DOE to administer the EECBG grants and provides all network users access to current program records. PAGE reduces data redundancy and paperwork, offering universal and complementary data collection via electronic forms that enable program-wide mining and analysis of data.

**4. Describe efforts to identify duplication.**

The information collected from EECBG recipients by DOE is generally unique collection specific to the EECBG program. The information collected is for the management of the awards

and programs specific to this program, and is not duplicated by other agencies or programs. General and broad questions are avoided as to prevent crossover between this program and other programs.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

Small businesses are not impacted by these requirements. Small local governments and tribal entities are subject to the reporting requirements. While the web-based system should not pose a problem for local governments, certain tribal entities may have technical difficulties with reporting. DOE has provided technical assistance to these tribal entities and has worked closely with tribal councils and the Bureau of Indian Affairs to ensure that all tribal nation recipients can comply. These entities have not been penalized for delays due to any technical difficulties they may have experienced.

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

All programs funded through ARRA have been subject to increased attention and scrutiny from OMB, the Congress, the General Accounting Office (GAO), the DOE Office of the Inspector General (OIG), the media and the public. If this information is not collected, DOE will not be able to provide substantive reports to OMB or respond to requests for information on ARRA-funded activities and expenditures. If the information is collected less frequently, DOE will not be able to provide the necessary oversight to the grants, and timely information will not be available to OMB, the White House, the Congress, GAO, the OIG, the media and the public.

Frequent reporting serves to highlight problems, barriers and system bottlenecks so that DOE can deal with risks expeditiously and ensure successful execution of the EECBG award. Quarterly reporting facilitates DOE's ability to monitor conformance with grant terms and conditions, progress on proposed work activities, as well as the associated project costs and schedules. If this information collection is not conducted, then DOE's ability to oversee EECBG grants will be restricted including our capacity to provide relevant information to our stakeholder constituents. Furthermore, DOE will be unable to scrutinize grants for potential waste, fraud or abuse of federal funds.

**7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.**

There are none. The information collection is being conducted in a manner that is consistent with OMB guidelines.

**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 comments.**

**Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside DOE.**

As published in the Federal Register on June 6, 2013 (78 FR 34089), DOE provided a 60-day public comment period on Energy Efficiency and Conservation Block Grant Formula Program reporting guidance for formula grant recipients.

No comments were received.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No payment or gift has been or will be provided to respondents.

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

No identifiable confidential information is being requested; however grant recipients may collect some forms of confidential information for their own purposes. Regarding Better Buildings Neighborhood Program, DOE would direct grantees, and their sub-awardees, to keep all confidential information regarding individual and household energy usage collected that identifies an individual by name or other linked or linkable identifying particular from being released. DOE intends to provide similar protections to that established in the Weatherization Assistance Program (WAP) regulations.

**11. 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.**

No questions of a sensitive, personal or private nature are being asked.

**12. Provide estimates of the hour burden of the collection information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.**

The EECBG burden below reflects three grants programs; the EECBG Formula Grant, the EECBG Better Neighborhoods-EECBG Competitive Topic 1 Grant, and the EECBG Better Neighborhoods- EECBG Competitive Topic 2 Grant. Each is calculated separately, and a total burden calculation is provided for all three grants programs.

**EECBG Formula Program Burden Estimates**

The estimates below reflect the completion of the ARRA grants. EECBG is not currently funded, and will not be awarding any new grants in this fiscal year. The majority of EECBG's 2,359 grantees have already completed their projects and are no longer reporting. The grantees with

active grants are required to report quarterly, until their grant is closed, or is reduced to projects only including financing programs that continue indefinitely. These programs are generally in the form of revolving loan funds (RLF) and loan loss reserves (LLR). Grants that are closed are not required to report. Grants that include only financing programs are being asked to report annually (instead of quarterly), beginning in September 2014, utilizing the pdf form described below, that is a simplified version of the current reporting document, utilizing tailored questions for financing programs.

The guidance on financing programs is available here

[https://www1.eere.energy.gov/wip/pdfs/eecbg\\_financing\\_guidance\\_09-002D\\_signed.pdf](https://www1.eere.energy.gov/wip/pdfs/eecbg_financing_guidance_09-002D_signed.pdf)

### **EECBG Formula - Quarterly Reporting burden**

Of the 2,359 EECBG Grantees required to report quarterly, 56 were state governments. Of these only 14 have grants that are still active and require quarterly reporting. States may require more time, since they are aggregating information from their small local communities. The estimated time required for preparation of a state's quarterly report is 15.5 hours. These States will only perform this report until they close out their grant, by September 30, 2015.

- 14 states, territories and District of Columbia (DC) = 14 grantees
- 14 grantees x 15.5 hours = 217 hours per reporting period
- 217 hours x 4 quarters = 868 hours annually

There are 2,303 EECBG Grantees (outside of state governments) required to report quarterly. Of these, 181 awards are still active and require quarterly reporting. The estimated time required for preparation of these reports is 9.75 hours.

- 181 grantees x 9.75 hours = 1764.75 hours per reporting period
- 1764.75 hours x 4 quarters = 7059 hours annually

### **EECBG Formula - Quarterly Reporting Burden Subtotal:**

- 868 hours annually for states + 7,059 hours annually for non-states = 7,927 hours annually
- EECBG Formula quarterly reporting burden = 7,927 hours annually

The numbers reflected above are the maximum number of reports that will be made over the course of the three year period. However, this number will slowly go down as grantees complete projects and close out awards. There will likely be no grantees reporting quarterly after September 2015, and the great majority of grantees will close out by the end of 2014.

### **EECBG Formula - Annual Reporting burden**

Of these awardees, 96 have ongoing financing programs that will be required to report annually beginning in the fall of 2014, and continuing as long as the financing programs continue. There are 99 financing programs total, as a small number of grantees has more than one financing

program. This annual reporting will replace quarterly reporting for this set of grantees. Each grantee will prepare an annual report and submit it by email to a specially assigned email address. The proposed form for this collection is attached. After consulting with grantees and Project Officers, EECBG has determined that it will take 3 hours for the awardees to complete this annual report.

99 financing programs x 3 hours x 1 annual report = 297 hours annually

### **Better Buildings Neighborhood Program Burden Estimates (Topic 1 and Topic 2)**

Better Buildings Neighborhood Program includes the EECBG Competitive Topic 1 and EECBG Competitive Topic 2 financial assistance awards. The overall reporting burden consists of the combined programmatic and financial report and the individual retrofit report. The reporting burdens for each of these collections are summarized below.

#### **EECBG Competitive Topic 1**

##### ***Programmatic and Financial Data - Quarterly Reporting Burden***

The 35 Better Buildings Neighborhood Program grantees were required to report programmatic data quarterly. Only thirty-two (32) grants are still required to report.

Six (6) grantees are required to report utilizing the full quarterly programmatic report. These grantees will report for 3 additional quarters. The estimated time for collection and transmission of the quarterly information is twelve (12) hours.

- 6 grantees x 12 hours = 72 hours per reporting period
- 72 hours x 3 reports = 216 collection hours total

Twenty-Nine (29) grantees are required to report utilizing a simplified quarterly programmatic report for financing programs. (Four (4) of these grantees must provide the full report above for 3 quarters, in place of this report.) The estimated time for collection and transmission of the quarterly information is ten (10) hours.

- 29 grantees x 10 hours = 290 hours
- 290 hours x 4 reports = 1160 hours annually

##### ***Individual Retrofit Data - Quarterly Reporting Burden***

The thirty-five (35) Better Buildings Neighborhood Program grantees were required to report individual retrofit data quarterly. Only six (6) grants remain open and are still undertaking retrofit activities. These six (6) grantees will report for only three (3) additional quarters. The estimated time for collection and transmission of the quarterly information is 120 hours.

- 6 grantees x 120 collection hours(480 retrofits x .25hours each) = 720 hours per reporting period
- 720 collection hours x 3 reports = 2160 collection hours total

EECBG Competitive Topic 1 total reporting burden hourly estimates per year are summarized in the table below for each of the data collections.

Better Buildings Neighborhood Program Reports	Estimated Hours Annual Burden
Programmatic and Financial Report	1192 (average)
Individual Retrofit Report	720 (average)
Better Buildings Neighborhood Program Total =	1912 (average)

### **EECBG Competitive Topic 2 Burden Estimate**

The 11 EECBG Competitive Topic 2 recipients administered by the Weatherization and Intergovernmental Program are required to submit a quarterly report.

The estimated time required for preparation of an EECBG Competitive recipient's quarterly report is two hours.

- 11 grantees x 2 hours = 22 hours per reporting period
- 22 hours x 4 quarters = 88 hours annually

### **EECBG Competitive Topic 2 Reporting Subtotal:**

- EECBG Competitive Topic 2 – quarterly reporting subtotal = 88 hours annually

The numbers reflected above are the maximum number of reports that will be made over the course of the three year period. However, this number will slowly go down as grantees complete projects and close out awards. There will likely be no grantees reporting quarterly after September 2015, and the great majority of grantees will close out by the end of 2014.

### **EECBG Formula, Better Buildings Neighborhood, and EECBG Competitive Topic 2 Total Burden Estimate**

The total hourly burden estimated per year for all EECBG Programs is in the table below.

EECBG Program Subtotal	Estimated Hourly Annual Burden
EECBG Formula Program	8224
Better Buildings Neighborhood Program	1912
EECBG Competitive Topic 2	88

EECBG Program Total =	10,224
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The total number of unduplicated responses is summarized below.

- Total number of unduplicated respondents: 323
- Average Reports Filed per grantee: 4
- Total Annual Responses: 1292
- The total estimated annual burden hours for the entire EECBG program are 10,224 hours per year.

The average burden estimated by hours per collection and applicant are below.

- Per Collection: 7.9 hours
- Per Applicant: 31.7 hours

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

DOE assumes \$40/hour for state government costs. The cost burden estimate for state, local and tribal governments is below.

- 323 entities x 31.7 hours/year = 10,224 hours annually
- 10,224 hours/year x \$40/hour = \$408,960/year

Per the EECBG (Formula & Competitive) Funding Opportunity Announcement:

State applicants may expend for payment of reasonable administrative and planning costs not more than 10 percent of amounts provided under the program including the cost of reporting.

For local governments & tribes: Up to 10 percent or \$75,000, whichever is greater, of grant funds may be used for administrative expenses, excluding the cost of meeting the reporting requirements of the Program. Administrative costs are the allowable, reasonable, and allocable to direct and indirect costs related to overall management of the awarded grant.

### **14. Provide estimates of annualized cost to the federal government.**

The development, hosting and maintenance costs associated with the PAGE system were shared among three separate programs – EECBG, WAP and State Energy Program (SEP). Currently, PAGE system maintenance and operational costs are estimated at \$154,000/month or \$1,848,000/year; EECBG's portion is approximately \$616,000/year.

The federal burden for 2013 estimate is based on a total number of hours to complete desktop reviews of reports, and verify information that is unclear. The estimate for a fully burdened,



average full time equivalent (FTE) is approximately \$72.00/hour. DOE approximates 2 hours to review each report. 1292 reports/year\*2hours/report\*\$72.00/hour= \$186,048

Thus the total cost to the federal government for these reports is \$802,048.

**15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of OMB form 83-1.**

DOE conducted a retrospective regulatory review of the EECBG Program in accordance with Executive Order 13563. As part of this initiative, DOE evaluated the annual reporting burden for the EECBG Program and determined that the monthly reporting requirement for 291 EECBG Formula grantees was too burdensome. This prompted DOE to eliminate the associated monthly reporting requirements for 291 grantees and change the user interface in PAGE for all Formula grantees. In addition, DOE considered alternative methods to calculate metrics for the EECBG Program. The annual reporting burden was further reduced by removing impact metric reporting requirements for EECBG Formula grantees.

**EECBG Formula Grantees**

In order to ensure consistency, grants that reported quarterly during the previous life of their grant are required to continue to report quarterly until the grants close out, or is reduced to projects only including financing programs that continue indefinitely. These are a small percentage of the 2,359 original grantees, as only 323 grantees continue to report.

Effective July 1, 2011, reporting financial outlays on a monthly basis by activity was no longer required. Outlays by activity are still required on a quarterly basis, but are entered as a single value representing the sum of outlays within a given reporting period. This change reduced the frequency of reporting workload on grantees. Additionally, reporting on activity obligations in Quarterly Performance Reports is no longer required as grantees already report this information for the entire grant through the Federal Financial Report.

DOE also removed the monthly reporting burden for 291 EECBG Grantees with total formula allocations of \$2 million or more in ARRA funding. This eliminated 291 hours per reporting period and 2,328 hours annually.

Job reporting requirements that included metrics for Jobs and Hours Worked were removed from the Quarterly Performance Reports in PAGE, thereby reducing the reporting workload on grantees. Previously, EECBG recipients had to disaggregate direct job hours by activity in PAGE. This information was found to be duplicative with OMB's reporting requirements, which already asked for job and hours worked for the entire grant. DOE no longer asks grantees to report impact metrics, such as energy saved and greenhouse gas averted, in the Quarterly Performance Report as grantees reported that this reporting requirement was burdensome, and also because DOE felt that using one unified calculation for impacts metrics yielded a more accurate data set.

Continuing quarterly reporting on these grants allows DOE to continue to monitor the grants, ensuring proper compliance with the technical and financial requirements of the grants. Many of the grants that are still open are those which had slow starts, or problems with completing defined projects. These grants require the highest levels of oversight and scrutiny to prevent fraud, waste and abuse.

Grants that have been down-scoped to only include financing programs, are being asked to report annually (instead of quarterly), beginning in September 2014, utilizing the new pdf form that is attached to this collection. These programs are generally in the form of revolving loan funds (RLF) and loan loss reserves (LLR).

### **EECBG Better Buildings Neighborhood Topic 1 and Topic 2 Grantees**

All Better Buildings Neighborhood grantees have completed “Once in the Grant” reporting requirements, and are now only required to report quarterly. In order to ensure consistency, Topic 1 grants that reported quarterly during the previous life of their grant are required to continue to report on individual retrofits quarterly until the grants close out, or is reduced to projects only including financing programs that continue indefinitely. These are a small percentage of the 35 original grantees, as only 6 grantees continue to report. This ensures that accurate data is collected for the entire grant program, and represents only 3 more reports per grantee- for a total of 18 reports.

Topic 1 grants that have a financing program (as described above)- a total of 29 grants- will be required to submit a substantially down-scoped amount of information on a quarterly basis. This reporting allows DOE to continue to monitor the grants, ensuring proper compliance with the technical and financial requirements of the grants.

Topic 2 grantees are also asked to continue to report quarterly. These grants will close out over the course of the information collection period. As stated in the section above, DOE made significant reductions in the information collected from these grantees. Continuing quarterly reporting on these grants allows DOE to continue to monitor the grants, ensuring proper compliance with the technical and financial requirements of the grants.

The net effect of the reporting changes is that the reporting burden to grantees has been vastly reduced.

### **16. For collections whose results will be published outline the plans for tabulation and publication.**

The EECBG Formula and EECBG Competitive Topic 2 Programs plan on aggregating program-wide data to document grant accomplishments. Additionally, the EECBG Formula and Competitive Topic 2 Programs will summarize recipient best practices using data obtained from PAGE quarterly reports to facilitate public discussion and program closeout. DOE will take all necessary precautions to ensure that the sharing of recipient information does not contain

National Security information or other information/data that is protected by other statute, practice, or legal precedent.

DOE will maintain compliance with current privacy requirements including OMB guidance and will ensure that data made available has any required Privacy Impact Assessments or System of Records Notices (SORN) available on DOE's websites. DOE will also maintain currency with public disclosure requirements, as well as ensure the required confidentiality, integrity, and availability controls are corroborated prior to release.

Access to this data will:

- Allow state and local jurisdictions and the research community access to quantitative and qualitative information related to practicable energy efficiency and conservation measures implemented as part of the grant award.
- Raise public awareness of the benefits of energy efficient technologies, document energy stewardship, and encourage sustainable energy practices.

The Better Buildings Neighborhood Program plans on publishing the results of this information request to grantees, and some forms of data to financial lending institutions and the research community.

- Grantees will receive information in the form of continuous improvement reports outlining roughly identified best practices and lessons learned for implementing energy efficiency retrofits in communities. These reports will enhance efficiency and effectiveness of program management. More robust results will be determined through the retrospective evaluation that will be conducted near the end of the program.
- The financial and research communities will have access to energy and financial data, scrubbed, masked, and top-coded of any personal information to reduce the ability to reverse-engineer identities. Better Buildings Neighborhood Program has received guidance from data.gov and will continue to refer to them as needed to take necessary precautions in sharing any form of this data.

Access to this data will:

- Enable financial institutions to quantify lending risks, incorporate energy savings into underwriting criteria, and develop future efficiency financing products.
- Prompt the research community to design and conduct their own analyses and to draw their own conclusions on the economic and environmental viability of energy efficient retrofits.

**17. If seeking approval not to display the expiration date for OMB approval of the information collection, explain why display would be inappropriate.**

Currently, OMB control numbers, expiration dates, and burden statements are displayed in PAGE, and will be displayed on any forms utilized. Therefore, DOE is not seeking approval to not display the expiration date.

**18. Explain each exception to the certification statement identified in item 19 of OMB form 83-1.**

There are no exceptions being requested.