

**Supporting Statement for Request of OMB Approval of the Extension of the Low Income Home Energy Assistance Program (LIHEAP) Annual Report on Households Assisted
May, 2015**

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, their income levels, and vulnerability group, 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 and (2) Short Format.

OCS requests that OMB approval of the LIHEAP Household Report be extended from FY 2016 through FY 2018 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 receiving nominal payments of \$50 or less;
- Assisted households receiving only utility payment assistance; this information will automatically be transferred to the grantee's Performance Data Form.
- Assisted households, regardless of the type(s) of LIHEAP assistance, excluding households that only receive nominal payments of \$50 or less;
- Assisted households, by type of LIHEAP assistance, having at least one vulnerable member **who is** at least 60 years or older, disabled, or five years old or younger;
- Assisted households, by type of LIHEAP assistance, with at 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.

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 estimated or final 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). If reporting estimated data, the grantee is required to submit a final Household Report no later than December 15th.
- 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 Improved Information Technology and Burden Reduction

All grantees reports are submitted through the Administration of Children and Families' On-Line Data Collection System (OLDC). Instructions for completing the form are built into the form itself, through hyperlinks.

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 on any type 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 Collecting 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 future outcome developmental 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 February 27, 2015, a notice was published in the Federal Register (79 FR 32550) requesting comments about the LIHEAP Household Report.
- A notice was published on the OCS website announcing the publication of the Federal Register notice and soliciting comments.

OCS received one comment from a community action agency in Louisiana requesting more information on the proposed data collection. A response was sent via email to clarify specifically what type of information is being sought. OCS has not yet heard back from the inquirer with further clarification.

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 Burden Hours and Costs

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 five Insular Areas) completing the information collection annually.

The response burden on respondents varies based on the following:

- The *LIHEAP Household Report - Long Format* for the 50 States, the District of Columbia, and the Commonwealth of Puerto Rico (average burden per respondent of 39 hours).
- The *LIHEAP Household Report - Short Format* for the 160 Indian Tribes/Tribal Organizations and 4 Insular Areas (average burden per respondent of 1 hour).

Annual Burden Estimates for *LIHEAP Household Report*

Instrument	Number of Respondents	Number of Responses Per Respondent	Average Hour Burden Per Response	Total Burden Hours
Long Format	52	1	39	2,028
Short Format	164	1	1	164
Total Annual Burden Hours				2,192

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*.

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

- For the *LIHEAP Household Report-Long Format*, OCS estimates that the total annual respondent cost to be \$65,520.

Staff	Number of respondents	Average # hours per respondent	Average \$ per hour	Total cost
Reporting	52	27	\$40	\$56,160
Recordkeeping	52	12	\$15	\$9,360
Total Cost				\$65,520

- For the *LIHEAP Household Report-Short Format*, OCS estimates the total annual respondent cost to be \$4,510.

Staff	Number of respondents	Average # hours per respondent	Average \$ per hour	Total cost
Reporting	164	0.5	\$40	\$3,280
Recordkeeping	164	0.5	\$15	\$1,230
Total Cost				\$4,510

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

Respondents will not incur any additional record keeping costs.

14. Annualized Cost to the Federal Government

Cost Item	Hours	Salary (per hour)	Total
GS-13: (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) oversee the work of the contractor.	353	\$43.66	\$15,412
Contractor Cost: (a) oversee the collection effort and prepare statistical tables (b) prepare tables with footnotes for final publication in the Report to Congress.	176	\$76.68	\$13,496
Total			\$28,908

15. Explanation for Program Changes or Adjustments

Under the amendments to the LIHEAP statute enacted in 1994 (Public Law 103-252), LIHEAP grant applications must include the *LIHEAP Household Report* on both applicant households and LIHEAP assisted households for the previous Federal Fiscal Year. The Department uses the reported data in the preparation of its annual *LIHEAP Report to Congress*. The Department is requesting the continuation of the use of *LIHEAP Household Report*. The Report does not represent a program change as it continues to use the LIHEAP Household Report-Long Format and the LIHEAP Household Report-Short Format.

The LIHEAP Household Report-Long Format is used to report required data for LIHEAP assisted households and for LIHEAP applicant households. The 50 States, the District of Columbia, and the Commonwealth of Puerto Rico must report the required data using this format. This format has been designed to collect additional household data for use in the *LIHEAP Report to Congress*.

This form, absent three small edits to the Long Form version in this proposal, had OMB clearance in prior years. The prior clearance was for three IC's; whereas, this proposal seeks clearance of just two IC's. We believe it was an administrative error that the prior clearance covered a third IC, as there has been no major program change related to this IC. It appears that the third IC from the prior clearance was related to Applicant Data; however, that was not intended to be a separate IC. The Long Form version of the Household Report previously had, and continues to have under this proposal, a section related to the number of applications for assistance that each state grantee received that federal fiscal year. It is the same reporting entity (the state grantee) that has and provides the data related to the number of households assisted and the number of applicant households. There is no need to collect data from applicants directly.

The LIHEAP Household Report-Short Format is used to report required data for assisted households. All direct-grant Indian Tribes/Tribal Organizations and Insular Areas (other than the Commonwealth of Puerto Rico) must report required data using this format. This format has been designed to greatly decrease the information burden on these relatively small LIHEP grantees.

The *Household Report – Long Format* is modified to include three additional fields:

- Total number of households receiving nominal payments of \$50 or less. This field is being added in order to collect information on nominal payments being issued by some State grantees. These households will not be included in the total count of households receiving any type of LIHEAP assistance. OCS data indicate 11 States currently make such nominal payments. The additional burden to these 11 States has been factored into the overall reporting and record keeping burden estimates addressed in question 11.
- Total number of households receiving bill payment assistance. This field is part of the data required for the Performance Data Form (OMB Control Number 0970-0449). Because the information requested concerns household counts, the field is being added to the Household Report, for ease of reporting. Burden associated with collecting, editing, reporting, and analyzing data to complete this field is part of the estimates for the Performance Data Form. Data entered into the Household Report will automatically be transferred into the Performance Data Form through OLDC, without any additional burden to the respondents.
- The Winter/Year-round crisis fields are being separated into two fields, one for Winter Crisis and a second for year-round Crisis. This is being done to create consistency in reporting between the Household Report – Long Format and the Performance Data Form – Section I – Grantee Survey. This change will cause no additional burden to respondents because they either operate winter crisis or year-round crisis, and cannot operate both types of programs. Thus, the change will be simply administrative, in order to better match data on households served with data on funds obligated for services.

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 2015.

Activity	Weeks following OMB approval [†]
<i>LIHEAP Household Reports</i> (household data can be estimated so as not to delay issuance of new grant awards) reviewed for completeness as part of the LIHEAP grant application process	18
Final (non-estimated) household data inputted and edited	83
Final household data checked and edited for consistency with benefit data from Performance Data Form – Section I – Grantee Survey, previous fiscal year household reports, carryover and reallocation reports, and LIHEAP state plans.	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 2015 would be reviewed for completeness as part of OCS' block grant application/plan review process for FY 2016 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 Submissions

There are no exceptions indicated to the certifications required by 5 CFR 1320.9.

B. Statistical Methods (used for collection of information employing statistical methods)

The information collection does not employ statistical methods.

1. Respondent Universe and Sampling Methods

N/A

2. Procedures for the Collection of Information

N/A

3. Methods to Maximize Response Rates and Deal with Nonresponse

N/A

4. Test of Procedures or Methods to be Undertaken

N/A

5. Individuals Consulted on Statistical Aspects and Individuals Collecting and/or Analyzing Data

N/A