**U.S. Department of Energy**

**Supporting Statement**

**Weatherization Assistance Program (WAP)**

**OMB Control Number: 1910-5127**

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

The Department of Energy (DOE) requires collection of information for the Weatherization Assistance Program (WAP) as included in Funding Opportunity Announcement DE-FOA-0000051, the Energy Independence and Security Act of 2007 (EISA) and the OMB requirements for grant and financial administration. DOE provides Federal financial assistance and technical support to states and local governments under the EISA. Information gathered provides current information required to respond to OMB, congressional and consumer requests and budget preparation.

The WAP Program has approximately $200 million in annual allocations. In order to adequately monitor, report, and ensure transparency and accountability, WAP requires quarterly reporting for this program.

For Program Year (PY) 2016, $215 million has been appropriated to allocate to the 59 award recipients.

In the past, the WAP forms that went through the ICR process were:

* + WAP Annual File Worksheet (DOE F 540.2)
  + WAP Subgrantee Information Worksheet (DOE F 540.5)
  + WAP QPR (DOE F 540.3)
  + WAP Annual Training, Technical Assistance, Monitoring, and Leveraging Report (DOE F 540.4)

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

All Weatherization Assistance Program information is used by DOE to determine program production and answer congressional, budget and public inquiries. Program staff utilize the information collected to track the recipients’ activities, their progress in achieving scheduled milestones, and funds expended (including expenditure rates). It is also used to determine program compliance and set program goals and objectives as required in 10 CFR 440. Below is DOE’s list of forms that the agency plans to use under this collection.

* 1. WAP Annual File: The Annual File Worksheet provides a format designed to gather specific detail related to the grant recipients’ plans for how they will fulfill obligations related to the WAP formula grant.  The annual file is a portion of the grantees plan that typically changes from year to year based on funding.
  2. WAP Subgrantee Information Worksheet: The WAP Subgrantee Information Worksheet is part of the grant recipients’ plans that provides required details for each subgrantee that will be performing weatherization activities for the grant recipient. The information collected provides supporting details for the subgrantees that are identified on the Annual File Worksheet.
  3. WAP QPR: The WAP Quarterly Program Report is designed to gather production and expenditure data to provide metrics showing how the grant recipient is fulfilling their weatherization related responsibilities. This information is used to justify the program and for responding to congressional, and other inquiries regarding the WAP program.
  4. WAP Annual Training, Technical Assistance, Monitoring, and Leveraging Report: This report provides a description of activities performed by the grantee during the program year for each of the three topics. This information is used to ensure that legal requirements are being met by the grant recipient.

1. **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.**

The Department of Energy, WAP developed a web-based system the Performance and Accountability for Grants in Energy (PAGE) that allows DOE to administer the WAP grants on-line and provide all network users access to current program records. PAGE reduces data redundancy and paperwork and provides a single access point for providing all requested reporting data including DOE forms 540.2, 540.3, and 540.4. All Grantees have PAGE access and can enter annual applications and reports directly into the system and sign and submit them electronically to the Department of Energy. All records entered or updated are forwarded to a national database at DOE Headquarters.

The grantee has two options for estimating the energy savings for the weatherization projects. One option is touse the WAP standard algorithm, which uses an average ‘savings multiplier’ that was developed by a working group with input from grantees. With this method, the number of units weatherized is multiplied by the savings multiplier to arrive at the total energy savings. Instructions for using this estimation method are contained in the Weatherization Assistance Program application instructions. The second option is for the grantee to use their own calculation method, which is provided and approved as part of their annual plan.

1. **Describe efforts to identify duplication.**

The WAP program is the only Federal program that provides weatherization services to low income Americans. The forms in PAGE were designed to provide a consistent format for the collection of program information. This information will then be retrieved in to answer programmatic questions and inquiries. The information collected is unique to the DOE therefore this collection is not duplicative.

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

Small Businesses are not impacted.

1. **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.**

Quarterly and Annual reporting allows DOE to adequately monitor, report, and ensure transparency and accountability.

The requirement of submitting a Plan once a year by a state is contained in 10 CFR 440. If this information is not provided by the states to DOE there will be no source of information to respond to congressional, budget and general public inquiries of the program.

DOE requires reporting of the activities for the Weatherization Assistance Program quarterly for the Program Report and annually for the Monitoring, Technical Assistance and Leveraging reports.

The WAP requires quarterly reporting to effectively monitor performance of the grant. Annual reporting would not allow Project Officers to effectively determine if the grants funds are being used in a timely, appropriate manner, and would prevent WAP leadership from effectively updating budgetary performance and future budgetary requirements to Congress and OMB. The quarterly report form has been simplified and reduced to capture specific WAP information according to 10 CFR 440, and to minimize the burden to award recipients.

The Monitoring, Leveraging and Technical Assistance reports were consolidated into one report in 2004. The reports will be submitted by the states that are WPA formula grant recipients on an annual basis.

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

The information collection is not being conducted in a manner inconsistent with OMB guidelines.

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

The Department published the 60-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on Wednesday, August 31, 2016, Federal Register / Vol. 81, No. 169. The notice described the collection and invited interested parties to submit comments or recommendations regarding the collection. Since that publication, changes associated with the burden hours have occurred. No comments were received. These changes are reflected in the 30 day FRN.

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

No payment or gift is being provided to the respondents.

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

There is no identifiable confidential information being requested. The information collected is collected at the state level, and individual identifiable information is not requested.

1. **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.**

There is no collection in this package that involves questions of a sensitive, personal or private nature.

1. **Provide estimates of the hour burden of the collection of 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 hours of burden for the quarterly report are estimated to be 4 hours (2 hours to organize information and seek clarification if needed from guidance, and 2 hours to complete forms). The hours of burden for the annual reports is 4 hours. The number of respondents is 59 States, territories and tribes.

The grantees burden is calculated as follows:

Grantee burden hours:

Quarterly report (DOE Form 540.3): 4 hours x 59 grantees x 4 quarters = 944 hours

Annual Report: (State Plan (DOE Form 540.2), Combined Monitoring, Technical Assistance and Leveraging Report (DOE Form 540.4)): 4 hours x 59 grantees= 236 hours

Total number of unduplicated respondents: 59

Reports filed per person: 9

Total annual responses: 531

Total annual burden hours: 1180

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

Per Collection: 2.22

Per Applicant: 20

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

DOE estimated the hourly and cost burden by speaking to a few agencies and asking for the hourly salary of the staff positions that actually enter the data for submission to DOE.

The cost burden is as follows:

Grantee burden costs = 1180 hours x $40/hr. = $47,200

DOE believes there are no additional costs to respondents other than the burden hours

reported.

**14.Provide estimates of annualized cost to the Federal government.**

By continuing to utilize the current PAGE data processes, DOE will continue to be able to reduce the time spent on applying and reporting cost of the grant process at the state and federal level. At the federal level, it is estimated that it takes each project officer approximately one hour to review each Grantee report.

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| --- | --- | --- | --- |
| Program Participant | # of Hours to complete forms | Fringe Benefit and Cost Per Hour | Total Cost |
| DOE Office | 290 Hours to Review | $ 50.00 | $14,500.00 |

1. **Explain the reasons for any program changes or adjustments reported in Items 13 (or 14) of OMB Form 83-I.**

DOE has drafted updated Weatherization Program Guidance to standardize how multifamily units are reported. As such, duplexes, three and four-unit buildings, and buildings with more than 5 units are all considered multifamily buildings for the purposes of eligibility (and subsequently, in the reporting of units). The WAP statutory authority and regulations require that on average the cost per dwelling unit for all eligible dwelling units within the State during a program year does not exceed $6,500 (adjusted). This allows for a Grantee to sometimes spend less than and sometimes spend more than $6,500 (adjusted) on an eligible dwelling unit. The weatherization work can result in improvements to all units in the building, even those that are not eligible units but the average cost must be calculated only taking into account the eligible units. However, in the reporting, all units should be reported to DOE in the multifamily category.

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

There are no plans for publication. The most recently published evaluation of the Weatherization Assistance Program, specifically the report “Weatherization Works – Summary of Findings from the Retrospective Evaluation of the U.S. Department of Energy’s Weatherization Assistance Program”, ORNL/TM-2014/338. DOE also published the report, “Estimating the National Effects of the U.S. Department of Energy’s Weatherization Assistance Program with State-Level Data: A Meta-Evaluation Using Studies from 1993 to 2005.”

The annual file and subgrantee information is used to ensure that grantees plans and procedures meet regulatory requirements before grant awards are made.  The QPR and annual report are used to ensure that the grantees performance is in line with their plan, and that they are meeting regulatory requirements.  Information from all forms is used to justify the program and for responding to Congressional, and other inquiries regarding the WAP program.

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

The Department is not seeking approval to not display the expiration date for OMB approval of the information collections contained in this package.

**18. Explain each exception to the certification statement identified in Item 19 of OMB Form 83-I.**

There are no exceptions to the certification statement identified in item 19. “Certification for Paperwork Reduction Act submissions” of OMB form 83-I.