

**Supporting Statement for Request of Information Collection Approval
of the Low Income Home Energy Assistance Program (LIHEAP) Plan
May 16, 2017**

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 (HHS), Administration for Children and Families (ACF) administers LIHEAP at the federal level.

Section 2605(c)(1) of the Omnibus Budget Reconciliation Act of 1981, as amended, (LIHEAP statute) provides that “as part of the annual application required..., the chief executive officer of each state shall prepare and furnish to the Secretary, *in such format as the Secretary may require*, a plan” which addresses several statutorily required data elements (emphasis added). [see also Section 2604(d)(4) regarding the Plan requirement for tribes]. Section 2605(c)(3) of the LIHEAP statute requires the Secretary to make available each fiscal year a model plan for use in the next fiscal year. The regulations require that states and territories (45 C.F.R. § 96.10(c)(2)) and tribes/tribal organizations (45 C.F.R. § 96.42(e)) that wish to administer a Low Income Home Energy Assistance Program (LIHEAP) must submit an application for funds each year **by September 1**. Indian tribes and tribal organizations must submit their LIHEAP Plans by the required deadline, unless the State(s) in which the tribe or organization is located agrees in writing to a specific later submission date.

The purpose of this Supporting Statement is to request authorization for the continuation of the LIHEAP Model Plan as a requirement for all LIHEAP Grantees to submit in order to qualify for federal funds.

2. Purpose and Use of the Information Collection

ACF is seeking authorization to provide LIHEAP grantees with a Model Plan to ensure that data are reported as consistently and accurately as possible by all grantees. This is consistent with reporting requirements of other ACF forms, such as the SF-425 Federal Financial Report which is required of all LIHEAP grantees.

All entries from each grantee's first submission of the Plan in OLDC will be saved and re-populated into the form for the following fiscal year's applications. Grantees will only need to make updates to the prior year's entries.

3. Use of Information Technology and Burden Reduction

LIHEAP Plans (applications) will be collected by OCS using the ACF GrantSolutions/On-Line Data Collection System (OLDC), which is a web-based reporting tool. Grantees are already

trained and familiar with this web-based tool as it is the same tool LIHEAP grantees have been using to report the annual SF-425 Federal Financial Report. ACF intends to have GrantSolutions/OLDC become the central reporting tool for all LIHEAP forms which will create administrative ease for both federal staff and grantee staff in accessing prior data as well as tracking the submission, review, and approval of submitted forms by both parties. This tool significantly reduces the possibility of lost and incomplete documents, as it has validated checks programmed to minimize incomplete submission of data. This tool also significantly increases the transparency of the submission and review process.

4. Efforts to Identify Duplication and Use of Similar Information

The proposed new model plan will combine the content of these two forms into one form, eliminating duplicative questions and streamlining the submission process. There is no similar source of information used which can be modified for the purpose of collecting required state plan information for the Low Income Home Energy Assistance Program from one year to the next.

5. Impact on Small Businesses or Other Small Entities

There is no impact on small businesses or other small entities.

6. Consequences of Collecting the Information Less Frequently

The information requirements are an annual activity which is required by law for the receipt of Federal block grant funds [42 U.S.C. § 8624(c)]. Under the LIHEAP statute, ACF must make a Model Plan available to grantees. It provides grantees an optional management tool that may alleviate the burden of preparing additional information to complete plans. This model encompasses the content of the information statutorily required for a complete Plan. Without this information collection, we would not be able to issue grants to States, Tribes, and Territories which in turn would be unable to provide assistance to low-income households to help with their home utility services. LIHEAP is typically administered as a seasonal program with peak need being in the winter months to provide assistance with home heating bills; therefore, the collection of this data prior to the winter ensures that ACF can timely provide grant funding for the assistance to be available as soon as possible after the appropriation is made available by Congress.

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

A 60-day notice was published in volume 82 of the *Federal Register* on page 16214 (1 page) on April 3, 2017 (see Attachment 2, 82 FR 16214). OCS received no comments on this notice.

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

There is no assurance of confidentiality that is applicable to this information collection.

11. Justification for Sensitive Questions

No sensitive questions are asked in this data collection.

12. Estimates of Annualized Hours Burden

If all current grantees choose to apply for funds, there will be approximately 210 respondents (one information collection of all directly funded LIHEAP grantees).

The system will pre-populate the data from the prior year into the next year's plan. Grantees will merely need to update the pre-populated data from year-to-year if they make changes to their program.

The current OMB inventory for this collection is 105 hours. OMB approval for the current information collection expires on June 30, 2017, approval number 0970-0075.

The breakdown in burden hours is as follows:

ANNUAL BURDEN ESTIMATES

INSTRUMENT	NUMBER OF RESPONDENTS	NUMBER OF RESPONSES PER RESPONDENT	AVERAGE BURDEN HOURS PER RESPONSE	TOTAL BURDEN HOURS
PLAN (future years)	210	1	0.50 (30 MINUTES)	105

Estimated Total Annual Burden Hours: 105

We estimate it will take 30 minutes per response including the time for reviewing previous applications, gathering the data needed and reviewing the completed plan. We estimate the cost, based on an hourly labor cost of \$20, to be \$2,100 (.50 x \$20 x 210 respondents).

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

Keepers/Capital Costs

There are no additional annual direct costs to respondents as a result of this information collection.

14. Annualized Cost to the Federal Government

Annual costs to the federal government for this collection are estimated based on an average total of 4 hours for federal staff to review each Plan in the first year of the collection and to make any necessary follow-up contacts with grantees to obtain additional information. We estimate that it will take an average of 1.5 hours to review each Plan in the subsequent years as the system will flag updated information making it readily apparent to staff what needs to be reviewed.

A GS-13 employee generally reviews each report and a GS 13 may also do second review. A GS-14 or GS-15 employee generally makes final decisions when there are questions about the adequacy of information. At an average salary rate of \$30 per hour, assuming 4 hours each for 210 applications and 1.5 hours each for 210 applications, the federal salary costs each year will be about \$34,650 ([4 hours x 210 applications] + [1.5 hours x 210 applications] x \$30).

15. Explanation of Program Changes or Adjustments

This is a continuation of an already approved collection; however, the prior clearance included two IC's one for a burden estimate applicable to FY 2015 and a second for a smaller burden estimate for future years. This request seeks continuing clearance of the second, smaller burden estimate which is based on the functionality ACF makes available in its Online Data Collection (OLDC) system that allows respondents to automatically "clone" the prior year Plan responses into the template for the coming year. This allows the respondent to focus on editing prior year answers, as needed, rather than having to recreate all responses from scratch each year.

16. Plans for Tabulation and Publication and Project Time Schedule

The GrantSolutions/OLDC system will generate a PDF file of the Plan that will be published on the LIHEAP Clearinghouse web site (a federally funded site) during the winter following the Plan due date, typically the following January.

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

The OMB approval number and expiration date will be clearly displayed on the front page of the Plan and action transmittals relating to application requirements. The information required in section 1320.8(3) in the regulation also will be displayed on the front page of the document.

18. Exceptions to Certification for Paperwork Reduction Act Submission

None.

B. Collection of Information Employing Statistical Methods

None.