

Supporting Statement for Request of OMB Approval Of  
The Extension of the Low Income Home Energy Assistance Program  
(LIHEAP) Carryover and Reallotment Report  
October 2018

## **A. Justification**

### **1. Circumstances Making the Collection of Information Necessary**

The authority to collect information concerning the amount of funds that will not be obligated in the fiscal year that those funds were awarded for the Low Income Home Energy Assistance Program (LIHEAP) is contained in Section 2607(b) of title XXVI of the Omnibus Budget Reconciliation Act of 1981 (Public Law 97-35), as amended.

Section 2607(b) of the LIHEAP statute stipulates that each State shall notify the Secretary at least two months prior to the close of a fiscal year, of the amount (if any) of its allotment that will not be obligated in the year that the funds were awarded. The Secretary shall not make payment to a State for a fiscal year unless the State has complied with this requirement with respect to the prior fiscal year. The amount held available from a prior fiscal year shall not exceed 10 percent of the funds awarded for that fiscal year. Funds exceeding 10 percent shall be reallotted among all grantees. No trends are noted as the end of the fiscal year approaches. Most of the funds are obligated for winter heating and summer cooling assistance.

Section 96.81 of the block grant regulations further specifies that the Carryover and Reallotment Report must be submitted to the Department by August 1 of each year and must contain the following information: (1) the amount of funds that the grantee requests to hold available for obligation in the following fiscal year, not to exceed 10 percent of the funds payable to the grantee; (2) A statement of the reasons that this amount to remain available will not be used in the fiscal year for which it was allotted; (3) A description of the types of assistance to be provided with the amount held available; and (4) The amount of funds, if any, to be subject to reallotment.

We are requesting no changes in the collection of data in the Carryover and Reallotment Report. The form clarifies the information being requested and ensures the submission of all the required information. Use of the form will be voluntary. Grantees have the option to use another format. The block grant regulations specify the information that should be submitted in the Carryover and Reallotment Report. However, it does not specify the format required. Therefore, some grantees choose to submit the information in a letter format.

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

The Administration for Children and Families (ACF) intends to use the mandatory annual report to determine the amount of funds to be reallotted. If the total amount available for reallotment for a fiscal year is less than \$25,000, the Department will not

reallot such amount. If the total amount available for reallotment for a fiscal year is \$25,000 or more, the Department will reallot such amount, except that the Department will not award less than \$25 in realloted funds to a grantee.

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

The Carryover and Reallotment Report is submitted to HHS, and must be submitted electronically via the On-Line Data Collection (OLDC) system for completion.

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

There is no duplication of collection of this data during the fiscal year. The form requests data on the amount of funds being carried forward, the reason the funds remain, the planned uses of the funds, and the amount subject to reallotment. As part of their annual application for funds, grantees are required by statute to provide this information. Accordingly, we are not requesting that data for the prior fiscal year be included as part of the report. There is no other requirement that States provide this information to us.

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

This data collection effort does not involve small businesses. Only State and tribal program offices are involved.

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

It is necessary to collect the data annually in order to determine the amount of funds available for reallotment, to perform any reallotment required, and to monitor grantees' compliance with the statutory requirement not to carry forward greater than 10 percent of the funds payable during a fiscal year. Grantees have very rarely had funds that must be realloted. Without this collection effort, there would not be timely reallotment of funds. The report is an effective way to obtain fiscal and performance data while the program is operating.

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

No special circumstances require the form to be collected in a manner inconsistent with the guidelines in 5 CFR 1320.6.

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

Notice of the request for OMB approval of information collection for the Carryover and Reallotment Report was published in the Federal Register and made available for review and comment on August 17, 2018 (Vol. 83 FR 41076). There was one comment:

**Minnesota**

To clarify expectations and reduce the burden of multiple REPORT revisions, Minnesota believes that a final REPORT should be required of all grantees on a specified date, no sooner than December 15th of each year. This requirement would allow time for final obligations to be adjusted (either upward or downward) as actual expenditures are finalized without the burden of requiring potentially multiple revisions to the REPORT. It would also ensure that HHS staff have reliable, timely, and accurate information on which to base allotment amounts.

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

There are no payments or gifts associated with this data collection effort.

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

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

**11. Justification for Sensitive Questions**

There are no sensitive questions in this collection.

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

The total annual reporting burden for the States, the District of Columbia, and Tribes for this report is estimated to be 531 hours. The estimated burden represents respondent time needed to review the form and its instructions, prepare responses, and submit the data. There will be 177 respondents submitting reports. We estimate the total average burden to be 3 hours per respondent, resulting in a total respondent burden of 531 hours.

OMB approval for use of this form expires on September 30, 2018. (Approval number 0970-0106).

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
Carryover and Reallotment Report	177	1	3	531
Estimated Total Annual Burden Hours:				531

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

The annualized cost to the States for responding to the report is estimated to be \$13,275. This was calculated by multiplying the burden of 531 hours by \$25, which is the estimated hourly rate of grantee LIHEAP staff involved in responding to the report.

There are no costs associated with or resulting from start-up or record keeping. The data generally are available as part of each grantee's administrative planning for the program, and will not be prepared especially for this report. Therefore, we estimate the annual cost burden to respondents for record keeping and start-up to be \$0.

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

The estimated Federal cost of this information collection totals to \$6,500 based on the following:

The approximate cost at a GS-12 level to prepare the spreadsheet reporting on the carryover and reallocation amounts, prepare the instructions and Action Transmittal, and prepare an Information Memorandum in the case of Reallocation is \$6,500.

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

We are requesting no changes in the collection of data with the form, the Carryover and Reallocation Report. The form clarifies the information being requested and ensures the submission of all the required information. Use of the form will be voluntary. Grantees have the option to use another format.

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

The form and instructions will be published in an Action Transmittal and distributed to LIHEAP grantees annually.

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

The OMB Clearance number and expiration date will be displayed on the form.

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

There are no exceptions necessary for this data collection effort.

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

**This report 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