
Supporting Statement for Weatherization Assistance Program

Part A: Justification

OMB No. 1910-5127

DOE Forms 540.2, 540.3, 540.4, 540.5

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, territories, Indian tribes, and local governments under the EISA. Information gathered provides the current status of grants required to respond to OMB, congressional and consumer requests, and budget preparation.

The WAP allocates annually over \$300 million. In order to adequately monitor, report, and ensure transparency and accountability, WAP requires quarterly reporting for this program.

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U.S. Department of Energy
Washington, DC 20585

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Introduction

Provide a brief introduction of the Information Collection Request. Include the purpose of this collection, note the publication of the 60-Day Federal Register Notice, and provide the list of forms within this collection.

The United States Department of Energy (DOE) requires the revision of a previously approved collection of information for the Weatherization Assistance Program (WAP), authorized in the Energy Independence and Security Act of 2007, Public Law 110-140 and in the Weatherization Assistance for Low-Income Persons, 42 U.S.C. §§ 6861-6873, to continue collecting information required to respond to OMB, congressional and consumer requests, budget preparation, and grant and financial administration. DOE provides Federal financial assistance and technical support to states and local governments under the EISA. Reports are used to monitor and ensure that Grantees are following statutory requirements as stated in 42 U.S.C. §§ 6861-6873, as well as regulations set forth in 10 CFR 440.¹

The WAP forms that make up this collection are:

- 1) WAP Annual File Worksheet (DOE F 540.2)
- 2) WAP Quarterly Program Report (DOE F 540.3)
- 3) WAP Combined Annual Training, Technical Assistance, Monitoring, and Leveraging Report (DOE F 540.4)
- 4) WAP Subgrantee Information Worksheet (DOE F 540.5)

A.1. Legal Justification

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the information collection.

The United States Department of Energy (DOE) requires the revision of a previously approved collection of information for the Weatherization Assistance Program (WAP). DOE provides Federal financial assistance and technical support to states and local governments under the EISA.

The WAP allocates annually over \$300 million in order to adequately monitor, report, and ensure transparency and accountability. WAP requires quarterly reporting for this program. For Program Year (PY) 2019, \$257 million has been appropriated to allocate awards to the 50 States, District of Columbia, 5 territories, and 1 Indian Tribe.

The WAP forms that make up this collection are:

- WAP Annual File Worksheet (DOE F 540.2)
- WAP Quarterly Program Report (DOE F 540.3)
- WAP Combined Annual Training, Technical Assistance, Monitoring, and Leveraging Report (DOE F 540.4)

¹ See Weatherization Rules and Regulations, <https://www.energy.gov/eere/wap/weatherization-assistance-program-updates/weatherization-rules-and-regulations-resources>.

- WAP Subgrantee Information Worksheet (DOE F 540.5)

A.2. Needs and Uses of Data

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection

All WAP 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 Worksheet:** 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, such as Subgrantees, WAP Production Schedule, Average Unit Costs, including Reweathering, Energy Savings, DOE-Funded Leveraging Activities, and State Plan Hearings. The Annual File Worksheet is a portion of the Grantees plan that typically changes from year to year based on funding.
2. **WAP Quarterly Program Report:** The WAP Quarterly Program Report (QPR) is designed to gather production and expenditure data to provide metrics showing how the grant recipient is fulfilling their weatherization related responsibilities. This report also collects respondent data regarding the types of units served by the WAP grant, including demographic information for the affected households to ensure statutory and regulatory compliance of the WAP. This information is used to justify the program and for responding to congressional, consumer requests, budget preparation, and other inquiries regarding weatherization activities
3. **WAP Combined 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 mentioned three topics. This information is used to ensure statutory and regulations set forth in 42 U.S.C. §§ 6861-6873 and 10 CFR 440² respectively are being met by the grant recipient.
4. **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 (such as contact information, tentative allocation, planned units, type of organization, sources of labor, and Subgrantee county and Congressional district location).

A.3. Use of Technology

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, e.g., permitting electronic submission of responses.

² See Weatherization Rules and Regulations, <https://www.energy.gov/eere/wap/weatherization-assistance-program-updates/weatherization-rules-and-regulations-resources>.

The DOE and WAP developed a web-based system called Performance and Accountability for Grants in Energy (PAGE), which allows DOE to administer the WAP grants online 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, 540.4 and 540.5. All Grantees have PAGE access and can enter annual applications and reports directly into the system, and sign and submit them electronically to the DOE. 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 to use 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 WAP 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.

A.4. Efforts to Identify Duplication

Describe efforts to identify duplication.

The WAP is the only Federal program that reduces energy costs for low-income households by increasing the energy efficiency of their homes, while ensuring their health and safety. 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.

A.5. Provisions for Reducing Burden on Small Businesses

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

Neither Small Businesses nor other small entities are impacted.

A.6. Consequences of Less-Frequent Reporting

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.

The QPR and Combined Annual Training, Technical Assistance, Monitoring, and Leveraging Report allows DOE to adequately monitor, report, and ensure transparency and accountability.

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

DOE requires the reporting of the activities for WAP: (i) quarterly for the Program Report and (ii) 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 the Office of Management and Budget (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 WAP formula grant recipients on an annual basis.

The Subgrantee Information Worksheet was created to collect the Subgrantee information from every Grantee. Grantees are required by 10 CFR 440 to provide information on the number of Subgrantees they are contracting with and their Dun and Brandstreet (DUNS) number.

A.7. Compliance with 5 CFR 1320.5

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines. (a) requiring respondents to report information to the agency more often than quarterly; (b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; (c) requiring respondents to submit more than an original and two copies of any document; (d) requiring respondents to retain records, other than health, medical government contract, grant-in-aid, or tax records, for more than three years; (e) in connection with a statistical survey, that is not designed to product valid and reliable results that can be generalized to the universe of study; (f) requiring the use of statistical data classification that has not been reviewed and approved by OMB; (g) that includes a pledge of confidentiality that is not supported by authority established in stature of regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; (h) requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

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

A.8. Summary of Consultations Outside of the Agency

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 to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or report.

The Department published a 60-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on October 1, 2019, volume 84, number 190, and page number 52079 and 52080. No comments on the information collection were received.

The Department also published a 30-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on February 14, 2020, volume 85, number 31.

Pursuant to 5 CFR 1320.8(d)(1), DOE furthermore consulted with WAP Grantees at trainings, conferences and other past events with regards to the amount of time it takes them to complete the required forms, the availability of data, the frequency of collection, the clarity of instructions, and the data elements to be reported. DOE provides 2 trainings every year at nationwide conferences and makes available Weatherization Program Notices, Memoranda, and webinars on relevant topics, so Grantees understand the forms and have the necessary information to fill them out.

A.9. Payments or Gifts to Respondents

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.

A.10. Provisions for Protection of Information

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 is collected at the state level, and individual identifiable information is not requested.

A.11. Justification for Sensitive Questions

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. This justification should include the reasons why DOE considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

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

A.12A. Estimate of Respondent Burden Hours

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. Unless directed to do so, DOE should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample fewer than 10 potential respondents is desirable.

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 number of burden hours for the annual reports (DOE Form 540.2, DOE Form 540.4, and DOE Form

540.5) is 6 hours. The number of respondents is 57; 50 States, the District of Columbia, 5 territories and 1 Indian tribe.

The Grantees' burden is calculated as follows:

Quarterly Reports:

Quarterly Program Report (DOE Form 540.3)

4 hours x 57 Grantees x 4 quarterly reports per Grantee = 912 hours

Annual Reports:

Annual File Worksheet: (DOE Form 540.2)

+ **Combined Monitoring, Technical Assistance and Leveraging Report: (DOE Form 540.4)**

+ **Subgrantee Information Worksheet: (DOE Form 540.5)**

6 hours x 57 Grantees x 1 annual report per Grantee = 342 hours

Total Grantee burden hours: 1,254 hours

Total number of unduplicated respondents: 57

Reports filed per person: 7

Total annual responses: 399

Total annual burden hours: 1,254

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

Per Collection: 3.14

Per Applicant: 22

Table A1. Estimated Respondent Hour Burden

Form Number/Title (and/or other Collection Instrument name)	Type of Respondents	Number of Respondents	Annual Number of Responses	Burden Hours Per Response	Annual Burden Hours	Annual Reporting Frequency
Quarterly Program Report (DOE Form 540.3)	Financial Personnel	57	228	4	912	4
Annual Reports (Combined DOE Forms 540.2, 540.4, 540.5)	Financial Personnel	57	171	2	342	1
TOTAL		57	399		1,254	

A.12B. Estimate of Annual Cost to Respondent for Burden Hours

Financial Personnel at the State level will fill out and submit these reports. The average hourly wage rate published by the U.S. Department of Labor for this type is \$42.37.³ By multiplying this by the total annual burden hours that respondents will incur in, we calculate that the total respondents' costs amount to

³ The Department of Labor's Bureau of Labor Statistics periodically updates the National Occupational Employment and Wage Estimates for the United States. Personnel Financial Advisors at the State/Territory level fill out and submit this report. See U.S. Bureau of Labor Statistics, U.S. Department of Labor National Occupational Employment and Wage Estimates, https://www.bls.gov/oes/current/oes_nat.htm#13-0000.

\$53,132. The previously approved collection incorrectly stated that the total cost for respondents was 0. DOE is adjusting these numbers to correct this information.

Table A2. Estimated Respondent Cost Burden

Type of Respondents	Total Annual Burden Hours	Hourly Wage Rate	Total Respondent Costs
State, Local or Tribal Government	1,254	42.37	53,132
TOTAL	0		53,132

A.13. Other Estimated Annual Cost to Respondents

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

No other additional costs to respondents.

A.14. Annual Cost to the Federal Government

Provide estimates of annualized cost to the Federal government.

The estimated time required for DOE staff to review each response is 2 hours, for a total of 798 hours yearly.

Annual Cost to the Federal Government: 2 hours x \$116.45 hourly wage rate x 399 (reports/yr.) = \$92,927.10

Table A3. Changes in Burden

EIA Form Number/Title	Annual Reporting Frequency	Number of Respondents (Previously Approved)	Number of Respondents (Requested)	Annual Number of Responses (Previously Approved)	Annual Number of Responses (Requested)	Burden Hours Per Response (Previously Approved)	Burden Hours Per Response (Requested)	Annual Burden Hours (Previously Approved)	Annual Burden Hours (Requested)	Annual Number of Responses			Annual Burden Hours		
										Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Adjustment	Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Adjustment
Quarterly Program Repd	4	59	57	236	228	4.0	4.0	944	912	-8	0	-8	-32	0	
Annual Report (Combine	3	59	57	177	171	1	2.0	177	342	-6	0	-6	165	0	
**Annual Report (Comb	2	59	0	118	0	0.5		59	0	-118		-118	-59		
				0	0			0	0	0		0	0		
				0	0			0	0	0		0	0		
				0	0			0	0	0		0	0		
				0	0			0	0	0		0	0		
TOTAL				531	399			1,180	1,254	-132	0	-132	74	0	

A.15. Reasons for Changes in Burden

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

Tracking the occurrence of Window Replacements in Support of the Reduction of Lead-Based Paint Hazards in the Quarterly Program Report

Per House Report 115–929, DOE will begin collecting data and tracking the occurrence of window replacements, which supports the reduction of lead-based paint hazards in homes. The data supplied will be used to quantify how many windows are replaced each quarter using DOE WAP funds, which support the reduction of lead-based paint hazards in the home.

Decreased number of Grantees since previously approved collection

Previously, the WAP had 59 Grantees: 50 States, the District of Columbia, 5 territories, and 3 Indian Tribes. Since then, 2 Indian Tribes decided to receive weatherization services through the State where their Tribal lands are located. Currently, WAP award Grantees are the 50 States, the District of Columbia, 5 territories, and 1 Indian Tribe, for a total of 57 Grantees.

Correction of previously approved collection

DOE has corrected previously approved information and has adjusted it for this collection. Inadvertently, DOE did not account for the burden of one report when calculating the burden hours of respondents. Additionally, DOE miscalculated the amount of hours incurred in reviewing the responses in the previously approved collection. DOE reported that it would take 290 hours to review, however upon reassessing this collection we updated the amount of hours and the federal fully burdened hourly wage rate to accurately reflect these changes.

798 hours (2 hours (per report) X 399 reports).

798 hours x \$116.45 hourly wage rate = \$92,927.10

\$92,927.10- \$14,500= \$78,427.10

Table A4. ICR Summary of Burden

	Requested	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Previously Approved
Total Number of Responses	399	0	-132	531
Total Time Burden (Hr)	1254	0	74	1180
Cost Burden	\$53,132	0	\$5,932	\$47,200

A.16. Collection, Tabulation, and Publication Plans

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

There are no plans for publication.

The annual file worksheet and Subgrantee information is used to ensure that Grantees' plans and procedures meet statutory and regulatory requirements before grant awards are made.

The QPR and the Combined Annual Training, Technical Assistance, Monitoring, and Leveraging Report are used to ensure that the Grantees performance is in line with their plan, and that they are meeting statutory and regulatory requirements.

Information from all forms is used to justify the program and for responding to Congressional, and other inquiries regarding the WAP.

A.17. OMB Number and Expiration Date

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.

A.18. Certification Statement

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.