

LIHEAP - RECS Data Match

**OMB Information Collection Request
0970 - 0486**

Supporting Statement Part A - Justification

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Submitted By:
Office of Community Services
Administration for Children and Families
U.S. Department of Health and Human Services

SUPPORTING STATEMENT 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.

The LIHEAP statute requires the program to collect data on recipient and eligible households, to report to Congress on program impacts annually, to develop performance goals, to ensure that benefits are targeted to those households with the greatest home energy need, and to assure that timely resources are available to households experiencing home energy crises. These specific statutory requirements are as follows:

- Section 2605(b)(5) of the Low Income Home Energy Assistance Act of 1981 (42 U.S.C. §8624(b)(5)), which requires LIHEAP grantees to furnish the highest level of energy assistance to households that have the lowest incomes and the highest energy costs or needs in relation to income;
- Section 2604(c) of the Low Income Home Energy Assistance Act of 1981 (42 U.S.C. §8623(c)), which requires LIHEAP grantees to (1) reserve a reasonable amount of LIHEAP funds for energy crisis intervention; and (2) address such crises within 18 or 48 hours, depending upon the severity of the crisis;
- Section 2610(a) of the Low Income Home Energy Assistance Act of 1981 (42 U.S.C. §8629(a)), which requires HHS to collect specific information on the characteristics of LIHEAP recipient and LIHEAP eligible households within each State. This includes collecting information that is reasonably necessary to carry out the provisions of the LIHEAP statute if that information is not collected by any other agency of the Federal Government; and
- Section 2610(b)(2) of the Low Income Home Energy Assistance Act of 1981 (42 U.S.C. §8629(b)(2)), which requires HHS to annually report to Congress on the impact LIHEAP is making on recipient and income eligible households.

The collection of this data is authorized in section 2610(a) of the LIHEAP statute, which requires the Secretary, following consultation with the Secretary of Energy, to provide for the collection of specific information on the characteristics of LIHEAP recipient and LIHEAP eligible households within each State. This includes collecting information that is reasonably necessary to carry out the provisions of the LIHEAP statute if that information is not collected by any other agency of the Federal Government.

OCS uses of a number of existing data sources to develop information on households that are income-eligible for LIHEAP. These include the following:

- The Department of Energy’s Residential Energy Consumption Survey (RECS) (OMB Control Number 1905-0092), which provides the most accurate information available about the demographic, economic, and energy-usage characteristics of U.S. households; and
- State administrative data, which provide the most accurate information about LIHEAP recipient households and which flow into the LIHEAP Household Report (OMB Control No. 0970-0060).

Neither the RECS nor the State administrative data alone provides information about the demographic, economic, and energy-usage characteristics of LIHEAP recipient households. (RECS’ LIHEAP reciprocity information is too unreliable for this purpose.) The only data that provides such information is that from the RECS respondents which the State administrative data demonstrates received LIHEAP benefits.

The purpose of this Supporting Statement is to request the reinstatement without change of the LIHEAP RECS Data Match to allow OCS to continue to collect administrative household data for use in identifying LIHEAP recipients that respond to the RECS, which the Department of Energy is planning to conduct the next iteration of in 2020.

2. Purpose and Use of the Information Collection

OCS seeks to collect State administrative data to identify the households in the RECS that are known to have received LIHEAP benefits. It plans to use the data so collected to generate a dataset that shows, of LIHEAP recipient households: (1) the demographic, economic, and energy-usage characteristics presented by the RECS; and (2) information, from the State administrative data, on program participation, program benefits, poverty status, vulnerability status, and (at the States’ options) ownership/rentership, type of fuel use, and heat-in-rent.

OCS plans to use the resultant dataset in various analyses that characterize LIHEAP recipient households and that compare recipients to income-eligible non-recipients. Such datasets will allow OCS to study the impact of LIHEAP on income eligible and recipient households in accordance with section 2610(b)(2) of the LIHEAP Act. Such studies will enter into the following publications and analyses:

- The Department's annual *LIHEAP Report to Congress* and *LIHEAP Home Energy Notebook*; and
- Estimates about fuel usage, expenditures, energy burden, and LIHEAP targeting among LIHEAP recipient households.

3. Use of Improved Information Technology and Burden Reduction

OCS will make every effort to reduce the burden of this data collection. Based on the prior recent collection of data, OCS estimates only 24 hours of response burden per respondent.

That's because all LIHEAP grantees already compile the required data. They do so to meet HHS' Household Report (HHR) reporting and non-duplication-of-benefit requirements. For this collection, OCS needs the higher-granularity data that backs up the data that they report. Accordingly, OCS plans to maximize rapid file transfer technology by using a secure internet site that employs File Transfer Protocol.

State LIHEAP grantees are familiar with the requested data elements and maintain administrative records that contain such elements to (1) manage their programs; complete their HHRs; and (3) complete their annual LIHEAP Performance Data Forms (OMB Control No. 0970-0449).

OCS expects such grantees to use their information technology systems to reduce the burden of providing such data.

4. Efforts to Identify Duplication and Use of Similar Information

The data that OCS is requesting is not available from any source other than LIHEAP grantees (and their sub-grantees), who collect this information for normal program management, federal reporting requirements, and administrative purposes.

RECS collects utility consumption and expenditure data for a nationally representative sample of households. OCS investigation has revealed no viable alternative to the RECS to furnish robust information on the home energy needs of LIHEAP recipient households, and to compare how the needs of LIHEAP recipients compare those of income-eligible non-recipient households.

OCS examined other potential options to identify LIHEAP recipients in the RECS data. RECS does collect information on household income and self-reports on whether respondents participated in energy assistance programs. But, these self-reports can refer to either LIHEAP or unrelated ratepayer-funded programs. Since the number of households that participate in ratepayer-funded programs is substantial and the benefits granted under such programs are quite different from LIHEAP, relying on self-reported data would furnish poor quality data information to address important LIHEAP Performance Measurement issues.

5. Impact on Small Businesses or Other Small Entities

There are potentially two different sources of information for the proposed data collection – State LIHEAP grantees and LIHEAP sub-grantees (i.e., local agencies). In many states, small community-based organizations serve as LIHEAP sub-grantees. In the normal course of service delivery, LIHEAP sub-grantees already are expected to collect information from applicant households and to report those data to the State LIHEAP grantees through automated information systems.

This data collection effort focuses on LIHEAP State grantees, rather than on smaller community-based sub-grantees. This approach avoids placing a burden on small sub-grantees and allows for more efficient data collection that impacts a smaller number of respondents. State LIHEAP Grantees already collect and utilize this data to complete annual reporting requirements for their state LIHEAP program, and they work regularly with OCS and its contractors.

6. Consequences of Collecting the Information Less Frequently

OCS seeks approval to collect this information only once under this request.

If this information isn't collected then HHS will be less able to study the impact of LIHEAP on income eligible and recipient households in accordance with section 2610(b)(2) of the LIHEAP Act. It will also be wholly unable to estimate fuel usage, expenditures, energy burden, and LIHEAP targeting among LIHEAP recipient households.

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

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency's intention to request an OMB review of this information collection activity. This notice was published on July 30, 2019 in Volume 84, Number 146, page 36928-36929, and provided a sixty-day period for public comment. During the notice and comment period, ACF received no comments in response to 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

OCS assures the strict privacy of all LIHEAP data and will protect the information to the extent allowed by Federal law. The use of this data is governed by the assurances under which the data were collected from respondents and sub-grantees. All LIHEAP clients sign authorizations in their LIHEAP applications that allow HHS and its contractors to use data for statistical purposes.

11. Justification for Sensitive Questions

No sensitive questions are asked in this data collection.

12. Estimates of Annualized Burden Hours and Costs

The table below summarizes the estimated burden hours and costs for this data collection. These estimates are based on the prior collection of data during FFY 2017.

Information Collection Title	Number of Respondents	Number of Responses Per Respondent	Average Burden Hours Per Response ¹	Annual Burden Hours ²	Average Hourly Wage ³	Annual Cost
2020 LIHEAP - RECS Data Match	51	1	24	1,224	\$71	\$86,904

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

There are no other costs to respondents and record keepers. The data collection procedures utilize existing systems and should not require any new capital expenditures by grantees.

14. Annualized Cost to the Federal Government

Federal Government Staff and Contractor tasks associated with the collection of these data include:

- Grantee Notification & Monitoring – Notifying grantees of the data collection and monitor progress of the data collection effort;
- Data Collection – Collecting the data from grantees; and
- Data Review and Analysis – Reviewing submitted data, working with grantees to verify the submitted data, and conducting analysis of the data to prepare administrative data variables and append them to the RECS data file.

The table below furnishes information on the estimated Federal Staff hours and costs associated with each task:

Annual Federal Staff Hours and Costs

Task	Number of Hours ⁴	Rate	Total Annual
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¹ This is based on an average of estimates from 7 grantees; includes direct grantee staff hours, as well as hours for grantee contactors/sub-grantees (if applicable).

² This is calculated by multiplying the number of respondents, number of responses per respondent, and the average hour burden per response.

³ This per hour rate was estimated based on publicly available information on grantee staff salaries and assumed overhead costs.

			Cost
Grantee Notification & Monitoring	2	\$93.76 ⁵	\$188
Data collection	13	\$131.76 ⁶	\$1,713
Data Review and Analysis	33	\$111.50 ⁷	\$3,680
Non-Labor Costs (Phone, Fax, And Copying)			\$38 ⁸
Grand Total:			\$5,619

The table below furnishes information on the estimated Federal Contractor Staff hours and costs associated with each task:

Annual Federal Contractor Staff Hours and Costs

Task	Number of Hours	Average Rate	Total Annual Cost
Data Collection	233	\$98.59 ⁹	\$22,971
Data Review and Analysis	321	\$89.70 ¹⁰	\$28,794
Grand Total:			\$51,765

Total estimated costs to the Federal government are **\$172,152** (or \$57,384 annually).

15. Explanation for Program Changes or Adjustments

The previous ICR approval anticipated 49 respondents instead of 51. This increase stems from an expected greater coverage of the RECS.

16. Plans for Tabulation and Publication and Project Time Schedule

The household-level data collected for this effort will only be used to identify which respondents in the RECS are LIHEAP recipients.

⁴ Estimates by Peter Edelman (ACF).

⁵ Wage rate of [GS 12, Step 5 in Washington DC](#) plus 100% for benefits, fringe, and management oversight.

⁶ Wage rate of [GS 14, Step 5 in Washington DC](#) plus 100% for benefits, fringe, and management oversight.

⁷ Wage rate of [GS 13, Step 5 in Washington DC](#) plus 100% for benefits, fringe, and management oversight.

⁸ \$100 from Peter Edelman's off-handed estimate for the initial ICR inflated by three percent per year for four years and divided by three for annualization.

⁹ Wage rate of Data Collection contractor for the initial ICR increased by the proportion by which federal wage rates increased since the initial ICR.

¹⁰ Wage rate of Data Review and Analysis contractor for the initial ICR increased by the proportion by which federal wage rates increased since the initial ICR.

The LIHEAP recipient data will be collected from grantees following the end of the relevant federal fiscal year as grantees are already preparing or have prepared the same data for use in completing their annual required reports. However, the data will not be published until the 2020 RECS data file is complete. The final RECS public use microdata file is not expected to be released until at least 2022. Based on that publication schedule, the RECS data file with the appended LIHEAP administrative data will first be available for use in 2023.

The aggregate data generated from RECS for the confirmed LIHEAP recipient population will be included in the LIHEAP Home Energy Notebook and the LIHEAP Report to Congress to furnish information to Congress on the LIHEAP recipient population. The data will also be used to support special studies and analyses of the LIHEAP program.

Activity*	Estimated Date**
LIHEAP Home Energy Notebook - Section II: Home Energy Data	June 2023
LIHEAP Home Energy Notebook - Section IV: Federal LIHEAP Targeting Performance	June 2023
LIHEAP Home Energy Notebook - Section V: Special Study of Energy Insecurity of Low-Income and LIHEAP Recipient Households***	June 2023
LIHEAP Home Energy Notebook - Appendix A: Home Energy Estimates	June 2023
LIHEAP Report to Congress - Part II: Home Energy Data	September 2023

* The activity depends upon the execution of the government’s plan to revise the LIHEAP Report to Congress and the LIHEAP Home Energy Notebook.

** Publication is dependent upon the Department’s clearance process.

*** This is the preliminary planned Special Study topic.

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

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

Not applicable.