

Low Income Home Energy Assistance Program (LIHEAP) Detailed Model Plan Application

**OMB Information Collection Request
0970 - 0075**

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

Summary

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.

ACF requests an extension of this information collection so that LIHEAP grantees can fulfill the statutory requirements necessary to qualify for federal funds.

2. Purpose and Use of the Information Collection

States, the District of Columbia, territories, and tribes/tribal organizations that wish to administer the Low Income Home Energy Assistance Program (LIHEAP) must submit an application for funds by September 1st each federal fiscal year (FY), covering a grant period of October 1 through September 30. Section 2605(c)(3) of the Omnibus Budget Reconciliation Act of 1981, as amended, provides that the Secretary shall make available a model LIHEAP Plan which may be used to prepare the application required under Sections 2605(a)(1) and (c)(1) (42 U.S.C. § 8624(a)(1) and (c)(1)). The Office of Community Services (OCS) has responsibility to review and accept LIHEAP Plan submissions on behalf of the Administration for Children and Families (ACF), which is the agency that administers LIHEAP at the federal level.

3. Use of Improved Information Technology and Burden Reduction

ACF collects grantee Model Plans using the ACF Grant Solutions/Online Data Collection (OLDC) system, which is a web-based reporting tool. Grantees are already using Grant Solutions/OLDC to submit their annual SF-425 Federal Financial Report, and ACF will continue to have Grant Solutions/OLDC be the central reporting tool for all LIHEAP forms

to 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. Also, each grantee's first submission of the Model Plan in the Grant Solutions/OLDC system will be saved and re-populated into the form for the following fiscal year's application. Grantees will only need to make updates to their prior year's entries as needed, meaning a reduction in overall grantee burden.

4. Efforts to Identify Duplication and Use of Similar Information

The Model Plan will combine the content of 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 Model Plan information 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

Grantees are required by law to submit Model Plans annually in order to receive federal block grant funds [42 U.S.C. § 8624(c)]. Without this information collection, ACF 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

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 27, 2020, Volume 85, Number 144, page 45222, and provided a sixty-day period for public comment. During the notice and comment period, ACF did not receive any comments.

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 Burden Hours and Costs

As in past years, ACF anticipates that all existing LIHEAP grantees (210 grantees) will complete Model Plan applications to apply for federal funds. We estimate it will take grantees 30 minutes to complete their Model Plan application, including the time for reviewing previous applications, gathering the data needed, and reviewing the completed application. We estimate the annual cost to respondents based on an hourly labor cost of \$17.81 per hour. To account for fringe benefits and overhead the rate was multiplied by two, which is \$35.62. The estimate of annualized cost to respondents for hour burden is \$35.62 x 105 hours or \$3,740.

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Social and Human Services Assistants [21-1093] and wage data from May 2019

<https://www.bls.gov/oes/current/oes211093.htm>

Instrument Title	Total/Annual Number of Respondents	Total/Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Total/Annual Burden Hours	Average Hourly Wage	Total Annual Cost
LIHEAP Detailed Model Plan Application	210	1	.50	105	\$35.62	\$3,740
Estimated Annual Burden Total:				105	Estimated Annual Cost Total:	\$3,740

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

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

14. Annualized Cost to the Federal Government

ACF estimates annual costs to the federal government for this information collection based on an average of 6 hours for federal staff to review each Model Plan and to make any necessary follow-up contacts with grantees to obtain additional information.

A GS-13 employee generally reviews each report and may also do second review. The GS-13 specialist has the key role in “accepting” or “rejecting” the Plan in the online system. The GS-13 specialist is also pivotal in communicating with applicants regarding revisions needed to accept the Plans as complete for funding. The average review takes approximately four hours initially. We further estimate that an additional 1.5 hours is needed by the specialist to review changes made by the applicants in order to complete their submission. And finally we estimate 0.50 hours for management consultation. At an average salary rate of \$37.70 per hour based on the GS-13 salary, assuming 6 hours each for 210 applications, the federal salary costs each year will be about \$47,502 (6 hours x 210 applications x 37.70).

15. Explanation for Program Changes or Adjustments

ACF requests the continuation of the already approved collection with no proposed changes.

16. Plans for Tabulation and Publication and Project Time Schedule

All LIHEAP Grantees are required to submit their Model Plan Application through OLDC by September 1 (annually). Copies of each final grantee Model Plan is downloaded from the GrantSolutions/OLDC system and will be published on the LIHEAP Clearinghouse website (a federally funded site) during the winter following the Model Plan due date, typically the following January.

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

Not applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions are necessary for this information collection.