

Low Income Home Energy Assistance Program (LIHEAP) Performance Data Form

**OMB Information Collection Request
0970 - 0449**

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

ACF is requesting a reinstatement with changes to the LIHEAP Performance Data Form. The LIHEAP Performance Data Form is an annual report that 51 LIHEAP state grantees have submitted to ACF on an annual basis. This form allows OCS to document state grantees' sources and uses of federal LIHEAP funds, to document LIHEAP performance measurement outcomes, to meet statutory requirements, and to maintain annual reporting of these data to Congress. The LIHEAP Performance Data Form was approved by OMB in 2014 (OMB Control Number 0970-0449) and renewed most recently in 2020. The form expired on April 1, 2021.

ACF is proposing changes to the form to allow ACF to collect and report performance information on the impacts of recently issued supplemental federal LIHEAP funds, including funds authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act, Public Law 116-136) and the American Rescue Plan Act of 2021 (ARPA, Public Law 117-2), and to make other minor changes to improve the form. The failure to collect this data will prevent OCS, LIHEAP grantees, and other decision-makers and stakeholders from having performance data to assess the impacts of these additional funding sources.

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 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. More specifically:

- Section 2610 of the LIHEAP Statute stipulates that the Secretary shall provide for the collection of certain data (Attachment 1). This section also requires the Secretary to submit to Congress each fiscal year a report on the data collected, on how States carry out certain requirements, on the impact of each State's program on recipient and eligible households, and on other relevant data.
- Section 2605(b) of the Low Income Home Energy Assistance Act of 1981 (42 U.S.C. §8624(b)) as amended by Sec. 311(b) of the Human Services Amendments of 1994 (Public Law 103-252) requires HHS to develop, in consultation with LIHEAP grantees, model performance goals that measure the success of each State's LIHEAP activities.
- Section 2610(b)(2) of the Low Income Home Energy Assistance Act of 1981 (42 U.S.C. §8629(b)(2)) requires that HHS annually report to Congress on the impact LIHEAP is making on recipient and income-eligible households (see Attachment 1 for statutory language).
- Section 2605(b)(5) of the Low Income Home Energy Assistance Act of 1981 (42 U.S.C. §8624(b)(5)) requires LIHEAP grantees to provide, in a timely manner, that the highest level of energy assistance will be furnished to those households that have the lowest incomes and the highest energy costs or needs in relation to income, taking into account family size.
- Section 2604(c) of the Low Income Home Energy Assistance Act of 1981 (42 U.S.C. §8623(c)) requires that grantees reserve a reasonable amount of LIHEAP funds (based on data from prior years) until March 15 of each program year for energy crisis intervention. Furthermore, grantees are required to address home energy crises within expedited timeframes.

The *LIHEAP Performance Data Form* (LPDF) is an annual data collection effort conducted by the U.S. Office of Community Services (OCS) to collect information from state LIHEAP grantees and the District of Columbia to meet statutory requirements and program objectives. Data are collected in three distinct Modules:

- **Module 1 (Grantee Survey)** – This module collects information on the different purposes for which LIHEAP funding is used and the estimated average benefits furnished to clients for each type of assistance. This information has been collected by OCS and reported annually to Congress for over thirty years. These data collection efforts have furnished OCS with important information on how each grantee has chosen to implement the LIHEAP program to address the needs of low-income households in their jurisdiction. (Note: Data from this Module are included in the *LIHEAP Annual Report to Congress*¹ and in the LIHEAP Data Warehouse available on the [LIHEAP Performance Management Website](#).)
- **Module 2 (LIHEAP Performance Measures)** – This module collects information for four developmental performance measures: the Benefit Targeting Index for High Burden Households, the Burden Reduction Targeting Index for High Burden Households, the restoration of home energy service, and the prevention of loss of home energy service. These measures were approved for data collection by OMB in 2014 and mandatory data collection began for Fiscal Year 2016. (Note: Data from this Module are included in the annual LIHEAP Report to Congress² in the annual Congressional Budget Justification, and in LIHEAP Data Warehouse available on the [LIHEAP Performance Management Website](#).)
- **Module 3 (Optional LIHEAP Performance Measures)** – This module is optional and allows grantees to voluntarily collect and report supplementary information that compliments the required performance measures data. These optional data increase the individual grantee’s ability to use the Performance Data for LIHEAP program management.

There are no other data collection efforts being conducted by OCS or other entities that provide the fiscal data included on Module 1 or the performance measures data included on Module 2 or Module 3. Without the collection of these data, there is no way to report to Congress on State-specific and aggregated fiscal and performance measures data for the most recent fiscal year on the program.

The LIHEAP Performance Data Form was approved by OMB in 2014 and renewed most recently in 2020. The form expired on April 1, 2021. The purpose of this Supporting Statement is to request the reinstatement to the LIHEAP Performance Data Form to allow OCS to continue to document state grantees’ sources and uses of federal LIHEAP funds, to document LIHEAP performance measurement outcomes, to meet statutory requirements, and to maintain annual reporting of these data to Congress. ACF is requesting a reinstatement with changes to allow ACF to collect and report Module 2 information on the impacts of recently issued supplemental federal LIHEAP funds, including funds authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act, Public Law 116-136) and the American Rescue Plan Act of 2021 (ARPA, Public Law 117-2), and to make other minor changes to improve Module 1.

2. Purpose and Use of the Information Collection

Below is a summary of the types of information that OCS is seeking authorization to continue to collect, the purpose in collecting these data, and how these data are used.

Module 1 (Grantee Survey)

OCS uses the mandatory Module 1 to collect and report on the States’ annual estimates of their sources and uses of LIHEAP funding, LIHEAP average household benefits, and maximum annual income cutoffs for 4-person households for LIHEAP.

The purpose of collecting the data for Module 1 is to obtain fiscal and benefits data from all 50 states and the District of Columbia. These data are used by OCS to analyze how grantees have chosen to implement the LIHEAP program to address the needs of low-income households and to report aggregated and state-specific

¹ Section I of the 2014 Report to Congress, found here: https://www.acf.hhs.gov/sites/default/files/ocs/fy14_liheap_rtc_final.pdf

² The FY 2016 Report to Congress is the first to contain performance measures data. This report is currently in the Department’s clearance process and is not yet published.

fiscal data in the Secretary's annual LIHEAP Report to Congress³ and in the LIHEAP Data Warehouse. The data also are used to respond to inquiries from Congress, OMB, and the White House relating to budget and program decisions.

Change Request Updates

ACF is requesting only minor changes to Module 1. ACF is requesting the following minor changes: (1) adding one reporting field for reporting previous-year Residential Energy Assistance Challenge (REACH) funds; (2) removing three reporting items that are redundant; and (3) implementing minor wording or label changes. These changes will improve the form and assist grantees with reporting information on the sources and uses of all federal LIHEAP funds, including regular funds, CARES Act funds, and recently awarded ARPA funds.

Module 2 (LIHEAP Performance Measures)

OCS uses the mandatory Module 2 to collect and report data for four developmental performance measures. The four performance measures are as follows:

1. *The benefit targeting index for high burden households receiving LIHEAP fuel assistance.* This measure quantifies LIHEAP's benefit targeting performance by measuring the extent to which the highest LIHEAP benefits are provided to households with the highest energy costs⁴ relative to household income.
2. *The burden reduction targeting index for high burden households receiving LIHEAP fuel assistance.* This measure quantifies LIHEAP's burden reduction targeting performance by measuring the extent to which households with the highest energy costs relative to income have a larger percentage of their energy bill paid with LIHEAP than households with average energy costs relative to income.
3. *The number of occurrences where LIHEAP benefits restored home energy services.* This measure includes the number of occurrences where energy service was restored after disconnection, where fuel was delivered after the household ran out of fuel, and where inoperable home energy equipment was repaired or replaced.
4. *The number of occurrences where LIHEAP prevented the loss of home energy services.* This measure includes the number of occurrences where a household had a past due or disconnect notice at the time of application and receipt of LIHEAP benefits, where assistance was provided to a household at imminent risk of running out of fuel, and where operable home energy equipment at imminent risk of failure was repaired or replaced.

The purpose of collecting the data for Module 2 is to obtain data from all 50 states and the District of Columbia that directly relates to the LIHEAP statutory mandate that LIHEAP assistance be targeted to those low income households with the highest home energy needs, i.e., vulnerable households and high-energy burden households. The four performance measures quantify how each LIHEAP program is targeting benefits to high energy burden and vulnerable households to help them maintain healthy, safe, and continuous use of home energy services, allowing for comparison over time and providing each grantee with information valuable for effective performance management and program implementation.

OCS uses the Performance Measures data to calculate aggregate performance data and report the results through the annual Congressional Justification budget process and in the annual LIHEAP Report to Congress. Grantees can compare their own results to the results for other states, as well as to regional and national summaries through the LIHEAP Data Warehouse.

Change Request Updates

ACF is proposing to revise Module 2 to include three submodules: Module 2A will collect data on all households (as was collected previously), Module 2B will collect data on the subset of households that received assistance

³ Section I of the 2014 Report to Congress, found here: https://www.acf.hhs.gov/sites/default/files/ocs/fy14_liheap_rtc_final.pdf

⁴ The LIHEAP program is intended to assist low-income households with their "home energy" costs. Home energy is energy used for home heating or cooling. This performance measure asks grantees to report on total residential energy bills because grantees and energy vendors do not have the statistical tools needed to estimate home energy usage. However, analysis of the 2009 RECS data shows that the correlation between households with high home energy costs and high residential energy costs averages 85%.

from supplemental LIHEAP CARES Act funds, and Module 2C will collect data on the subset of households that received assistance from supplemental LIHEAP ARPA funds. ACF notified LIHEAP grantees through the CARES Act LIHEAP Notice of Award letters and the ARPA Notice of Award letters that grantees must track and report on the uses of these supplemental funds. In addition, grantees already track and report information on the subset of households receiving these supplemental funds in the OMB-approved LIHEAP Household Report. This modification to Module 2 will allow ACF to continue to collect aggregate performance data (in Module 2A), but to also collect performance data information that is specific to each supplemental funding source (in Modules 2B and 2C), providing valuable information that is not available from any other source.

Module 3 (Optional LIHEAP Performance Measures)

Module 3 is optional. OCS includes this module to allow grantees to report additional data that supplements the data reported for Module 2, including data on energy consumption, air conditioning use, and home energy service restoration and prevention of loss. Individual grantees use the information voluntarily reported in this module to help analyze and interpret their Performance Measures results. No changes are being proposed to optional Module 3.

3. Use of Improved Information Technology and Burden Reduction

Every effort will be made to minimize the burden of this data collection by providing grantees with resources for efficient data collection, data processing, and data reporting.

- Data Collection – OCS has provided grantees with multiple resources to assist with collecting the necessary data to complete the *LIHEAP Performance Data Form*, including a data collection guide, data collection templates, and training webinars reviewing data collection procedures. OCS also has furnished one-on-one training and technical assistance to numerous grantees and makes such assistance available annually.
- Data Processing – OCS has developed guidance documents to assist grantees with data processing. In addition, the ACF On-Line Data Collection System (OLDC) calculates some of the data fields, rather than requiring the grantee to do so.
- Data Reporting – The *LIHEAP Performance Data Form* is collected by OCS using either a standardized spreadsheet template or the ACF On-Line Data Collection System (OLDC), which is a web-based reporting tool that grantees use to complete several LIHEAP reports. The OLDC tool assists grantees with completing the form by providing instructions, alerting grantees to possible errors, and allowing grantees to access prior versions of their report. OCS also provides extensive resources and training on data reporting with the intention of minimizing the burden associated with reporting accurate information. This includes detailed instructions on data reporting, webinars, a “Check before you submit” document, one-on-one technical assistance, and providing a summary of data reporting issues or questions following the review of each grantee’s submitted information.

Since 2010, the LIHEAP Performance Measures Work Group (PMIWG), consisting of state LIHEAP directors and HHS staff, has worked with OCS to develop resources and to encourage grantees to share information to assist with minimizing the burden of this data collection. Since the *LIHEAP Performance Data Form* was approved by OMB in 2014, a number of grantees have implemented or enhanced their existing data systems, client applications, client waivers, and vendor agreements to support collecting and reporting the required data.

4. Efforts to Identify Duplication and Use of Similar Information

OCS investigation has revealed no duplicate sources of the state-level data elements required for the *LIHEAP Performance Data Form*.

For Module 1 (Grantee Survey), no similar data are available for all categories of sources and uses of federal LIHEAP funds. Without this collection effort, there would be no timely uniform data available to comply with requests from Congress, OMB, and the White House. Nor would information regarding the impact of program

funds be available for the Department's Annual LIHEAP Report to Congress⁵, for hearings, and during the appropriations and oversight process.

For Module 2 (LIHEAP Performance Measures), similar data are available from two surveys published by the U.S. Energy Information Administration (EIA): the Residential Energy Consumption Survey (RECS) and the State Energy Consumption, Price, and Expenditure Estimates (SEDS). However, while these surveys provide similar information, neither survey provides adequate data for measuring LIHEAP performance:

- RECS – This survey collects utility consumption, energy expenditure, and energy insecurity data for a nationally representative sample of households. However, the RECS data has two limitations that make it inadequate for measuring LIHEAP performance. First, the RECS can only provide statistics for the nation, Census regions, and Census Division. Due to RECS sample design, state-level estimates are not available. Second, the RECS is conducted approximately every five years, limiting the timeliness of the data and prohibiting annual estimates. Due to these limitations, the RECS is not suitable for annual, state-level LIHEAP performance measurement.
- SEDS – This is an annual survey that furnishes information on energy consumption and energy expenditures for a number of different fuels at the state level. However, the SEDS data cannot furnish any information on the LIHEAP population and LIHEAP performance.

In summary, while both RECS and SEDS provide useful information that is used by OCS for a number of purposes, neither data source can furnish information on the annual performance of LIHEAP at the state-level.

5. Impact on Small Businesses or Other Small Entities

There are three sources of the additional data sought—LIHEAP grantees, LIHEAP sub-grantees (i.e., local agencies), and energy vendors. LIHEAP sub-grantees are often small community-based organizations. Plus, some energy vendors are small businesses.

LIHEAP grantees consist solely of states, including the District of Columbia; certain territories; and certain Indian tribes and tribal organizations. Only the states and the District of Columbia complete the LPDF. None of those entities is a small business.

LIHEAP sub-grantees often consist of small, community-based organizations. Prior to FFY 2020, LIHEAP sub-grantees were expected, in their normal course of business, to track LIHEAP funds by federal fiscal year, source, and use. For FFY 2020, OCS required their primary grantees to track funds appropriated by the CARES Act and otherwise. OCS expects their primary grantees to flow down this requirement to the LIHEAP sub-grantees.

Certain energy vendors consist of small businesses. Prior to FFY 2020, LIHEAP grantees and LIHEAP sub-grantees required them to track LIHEAP funds by federal fiscal year, source, and use. For FFY 2020, OCS expects them also to track funds appropriated by the CARES Act and otherwise. However, OCS believes that this additional requirement will require no more than a minor adjustment to their existing tracking systems.

6. Consequences of Collecting the Information Less Frequently

OCS is seeking approval to continue to collect this information annually, on a continuous basis. This will allow OCS and its grantees, as well as Congress and other decision-makers and stakeholders, to understand how grantees use federal LIHEAP funds and to gauge the impact LIHEAP services are having on its recipients each year. In addition, LIHEAP grantees can use the results of their own data to track their use of funds, average benefit levels, and their performance measure outcomes to observe year-after-year changes and to make adjustments to their programs, if desired. They will also be able to see the impact of program changes in future years' data. Collecting these data any less frequently will prevent fiscal and performance measures data from being reported in the annual LIHEAP Report to Congress and will invalidate their usefulness as a timely benchmark of performance and measure of impact.

⁵ Section I of the 2014 Report to Congress, found here: https://www.acf.hhs.gov/sites/default/files/ocs/fy14_liheap_rtc_final.pdf

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 on pages 14932-14934 of the Federal Register on March 19, 2021. OCS did not receive comments during this timeframe.

OCS consulted with outside parties regarding the renewal and modification of the Performance Data Form. OCS and its contractor communicated with state grantee members of the LIHEAP PMIWG and a small number of additional grantees to understand how grantees were utilizing supplemental LIHEAP funds and tracking households that received these funds. Based on this information, OCS worked closely with its contractor that furnishes training, technical assistance, and data validation for the Performance Data Form, to develop the proposed revisions to the form and to ensure that burden resulting from changes was minimized. OCS and its contractor also collected information from a small number of PMIWG members to understand how the proposed modifications would impact grantees and to estimate changes to the data collection burden.

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

We will protect the information to the extent allowed by Federal law.

11. Justification for Sensitive Questions

No sensitive questions are asked in this data collection.

12. Estimates of Annualized Burden Hours and Costs

The estimated annual burden hours and costs associated with this data collection are shown in the table below. These estimates derive from those reported on the Supporting Statement of the [last renewal request for this form](#) and recent interviews with a small number of grantees.

For Module 1, there are no changes to the expected burden for State Grantees because grantees already collect the required data and the only proposed changes to the form are minor. To improve Module 1, three redundant reporting items that exist on Module 2 were removed, removing estimated burden estimates for energy vendors. These consisted of the requests for average annual total LIHEAP benefit per household, which essentially duplicated the requests on Lines B.3 of sub-modules 2A, 2B, and 2C.

For Module 2, the expected burden for state grantees increased to 200 hours per response based on interviews with a small number of grantees about the incremental additional data processing and reporting time to report data in the proposed submodules. The expected burden for energy vendors and subgrantees was unchanged.

Overall, the burden house estimated are four percent higher than the prior 2020 burden estimates.

The average hourly wage used for State Grantees is based on publicly available information on grantee staff salaries and assumed overhead costs. These data were compiled for the 2020 RECS LIHEAP Match (Control Number is 0970-0486) and adjusted to account for rate increases since 2019.

The average hourly wage used for Sub-Grantees and Energy Vendors is based on the average of Bureau of Labor Statistics (BLS) job code for Data Entry and Information Processing Workers [43-9020] (80%) and Computer and Information Systems Managers [11-3020] (20%). Wage data from 2020 was used, and rates were multiplied by two to account for fringe benefits and overhead.

LIHEAP Performance Data Form	Total Number of Respondents	Total Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
Module 1 (Grantee Survey)						
State Grantees — Module I	51	1	36	1,836	\$75	\$137,700
Modules 2 and 3 (LIHEAP Performance Measures)						
State Grantees — Modules II and III	51	1	200	10,200	\$75	\$765,000
Sub-Grantees (in states with sub-grantee managed systems) — Modules II and III	100	1	8	800	\$60	\$48,000
Energy Vendors (largest 5 electric, 5 natural gas, 10 fuel oil, and 10 propane vendors per state - average) — Modules II and III	1,530 (estimate)	1	8.5	13,005	\$60	\$780,300
Total Annual Burden Hours	-	-	-	25,841	-	\$1,731,000

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

The data collection procedures should not require any new capital expenditures by grantees, sub-grantees, or energy vendors. The amended data collection procedures required for reporting performance data for supplemental CARES Act and ARPA funds build on existing systems and so should not require any new capital expenditures by grantees, sub-grantees, or energy vendors.

14. Annualized Cost to the Federal Government

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

1. Grantee Monitoring – Notifying grantees of the reporting requirement and conducting follow-up with grantees.
2. Report Review – Reviewing submitted reports and working with grantees to furnish reliable data.
3. Analysis and Reporting – Conducting analysis of the reported data and preparing tables to be submitted with targeted administrative reports (e.g., LIHEAP Report to Congress).

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	Rate	Total Cost
Grantee Monitoring	42	\$112.62/hour	\$4,730
Grantee Report Review	66	\$112.62/hour	\$7,433
Analysis and Reporting	105	\$112.62/hour	\$11,825
Subtotal:			\$23,988

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 Cost
Grantee Report Review	384	\$65.56	\$25,175
Analysis and Reporting	216	\$65.56	\$14,161
Technical Assistance	288	\$87.42	\$25,176
Subtotal:			\$64,512

Total federal government costs are **\$88,500**.

15. Explanation for Program Changes or Adjustments

This request is for a reinstatement with changes to the prior collection approved by OMB under ICR Reference No. [202012-0970-004](#). The changes proposed to the LIHEAP Performance Data Form consist of (1) segmenting Module 2 into three submodules to collect additional performance measures data for the subset of households assisted with supplemental LIHEAP CARES and/or ARPA funds, (2) adding an item for reporting previous-year Residential Energy Assistance Challenge (REACH) funds in Module 1; (2) removing three reporting items from Module 1; and (3) minor wording or label changes. The total impacts of these changes results in an estimated four percent burden hour increase from the prior approved 2020 burden estimates.

16. Plans for Tabulation and Publication and Project Time Schedule

The data from Module 1 of the *LIHEAP Performance Data Form* is included in the LIHEAP Report to Congress⁶ to furnish Congress with information on how LIHEAP funds are used by grantees to deliver services to clients.

The data from Module 2 will be synthesized into the four performance measures described above and published in the annual LIHEAP Report to Congress. In addition, the raw data, as well as the synthesized performance measures will be made available to each grantee through the LIHEAP Data Warehouse. Each grantee will also be able to access their performance measures, the measures for other grantees, and national and regional summaries.

Activity	Weeks Following Report Submission Deadline
Completion of quality assurance testing on performance measures data (requires review of data inconsistencies and outliers with grantees)	8 Weeks
Synthesis of data into performance measures indicators	12 Weeks
Draft of statistical tables for inclusion in annual LIHEAP Report to Congress – text and appendices	16 Weeks
Final statistical tables for inclusion in annual LIHEAP Report to Congress	20 Weeks
Publication of annual LIHEAP Report to Congress*	--
Live launch of raw data and performance measures indicators on the LIHEAP Data Warehouse	1 day post publication of Report to Congress

* Publication is dependent upon the Department's clearance process of the annual LIHEAP Report to Congress.

The form will be due by grantees on February 16, 2022, pending OMB approval.

⁶ Section I of the 2014 Report to Congress, found here: https://www.acf.hhs.gov/sites/default/files/ocs/fy14_liheap_rtc_final.pdf

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

Non-applicable.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

None.

B. Collection of Information Employing Statistical Methods

Statistical methods are not employed for collecting, analyzing, reporting data from Module 1 (Grantee Survey) as only total amounts and percent distributions are reported or tabulated.

One purpose of Module 2 (LIHEAP Performance Measures) is to calculate performance measures for individual states and the nation on the targeting of benefits and energy burden reduction to high burden households. As part of this process, grantees collect data on LIHEAP client energy expenditures from energy vendors. OCS worked with grantees to identify procedures that would furnish high quality data but also minimize reporting burden by targeting data collection to a subset of large energy vendors. Analysis of data by OCS found that the client-level variability in energy burden is mainly a function of client income, client energy usage, and fuel price. Fuel price variability is mainly a function of the fuel used (e.g., electricity, natural gas, fuel oil, or propane) rather than the company that supplied the fuel. (Delivered fuel markets, in particular, are very price sensitive.) For that reason, restricting the data collection to a subset of companies does not affect the data quality. (Note: Average expenditures for clients served by the largest companies were within 1% of the value of average expenditures for clients served by all companies.)

One reason to restrict the data collection to large companies is that those companies tend to high quality information systems and are more likely to have existing data exchange procedures with the grantee's LIHEAP office and thereby can minimize reporting burden. Those grantees that request data from larger companies (including larger delivered fuel vendors) have found that automated procedures make reporting burden independent of sample size. For that reason, the vendors are able to report on all clients served by the program and thereby can furnish statistically robust data on the energy burden outcomes for clients.

For most grantees, the top 5 electric and gas companies serve 75% or more of LIHEAP clients using those fuels. For the small number of grantees that were reviewed by OCS, the top 10 fuel oil and LPG companies serve at least one-third of LIHEAP grantees using those fuels. For most grantees, those sample sizes are sufficient to furnish statistically robust estimates.

In a few jurisdictions (e.g., Tennessee and Nebraska), the electricity and/or natural gas markets are not so concentrated. In those jurisdictions, a large number of companies might need to be included in the reporting requirements to furnish robust estimates. However, those are balanced out by some small states that have only one or two major electric and/or natural gas utilities.