

Low Income Household Water Assistance Program (LIHWAP) Reports

**OMB Information Collection Request
0970 – 0578**

Supporting Statement Part A - Justification

February 2022

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

Summary

The Administration for Children and Families Office of Community Services (OCS) sought and received emergency review and approval of this information collection by the Office of Management and Budget in October 2021, as authorized under [44 U.S.C. 3507](#)(subsection j). OCS is now seeking to extend approval of the data collection, with revisions, under the normal Paperwork Reduction Act clearance process. Revisions are based on comments received during the sixty-day comment period in response to our initial Federal Register Notice. Section 8 of this supporting statement provides an overview of the comments and OCS responses, and Appendix 1 includes a table that outlines all comments received and OCS's individual responses to each one.

1. Circumstances Making the Collection of Information Necessary

The proposed forms are necessary to provide data to the Administration and Congress in its oversight of recipients' performance in administering the Low Income Household Water Assistance Program (LIHWAP) program. The LIHWAP effort was authorized under two separate appropriations as part of an emergency effort to prevent and respond to COVID-19.

- The Consolidated Appropriations Act, 2021 (Public Law No.: 116-260) signed on December 27, 2020, included \$638 million in funding with instructions for the Administration for Children and Families (ACF) within the U.S. Department of Health and Human Services (HHS) to carry out grants to states, territories and tribes to assist low-income households with water and wastewater bills.
- On March 11, 2021, the American Rescue Plan Act of 2021 (Public Law No.: 117-2) appropriated an additional \$500 million to the new LIHWAP effort.

The full appropriations language from both the Consolidated Appropriations Act of 2021 and the American Rescue Plan Act are available on the Office of Community Services (OCS) website through the following weblink:

<https://www.acf.hhs.gov/ocs/law-regulation/lihwap-laws-and-regulations>

LIHWAP does not have a permanent or ongoing statutory authorization or appropriation beyond the current funding.

Congress has neither enacted any other law or issued any official report concerning LIHWAP. The LIHWAP effort was authorized as part of an overall emergency effort to prevent, prepare for, and respond to the coronavirus. The appropriations language contained in the Consolidated Appropriations Act of 2021 instructs that HHS and recipients to “the extent practicable, use existing processes, procedures, policies, and systems in place to provide assistance to low-income households.” Based on this instruction, OCS, which is administering the LIHWAP effort, has closely modeled many of the terms and conditions for LIHWAP legislative assurances and requirements on the Low Income Home Energy Assistance Program (LIHEAP) as authorized by the Low Income Household Energy Assistance Act, 42 U.S.C. 8621 et seq. While the terms and conditions are modeled on the LIHEAP statute, to ensure consistency in processes, procedures, policies, and systems, LIHWAP funds are not otherwise subject to LIHEAP statutory requirements.

As a result of the emergency nature, the timeline to implement the program was very short and the time to develop and submit related performance measures is similarly short. The proposed LIHWAP Quarterly Performance and Management Report and the LIHWAP Annual Report are conducted in accordance with the LIHWAP statute (Public Law 116-260) and will provide the Administration and Congress information necessary for oversight of recipients' performance in administering the LIHWAP program. The completeness, accuracy, consistency, and timeliness of responses to data collections are needed for the agency to do the following:

- Ensure that LIHWAP, an emergency and temporary program, is implemented effectively and efficiently;
- Provide reliable and complete fiscal and household data for OCS analysis and reporting to Congress and the public; and
- Respond to questions from the Congress, Department of Health and Human Services, OMB, White House, and other interested parties in a timely and accurate manner.

OCS published a [Dear Colleague Letter \(DCL\) 2021-05 LIHWAP Funding Release](#) that notified LIHWAP recipients that they must track, account for, and report on, the LIHWAP Consolidated Appropriations Act funding separate from the American Rescue Plan Act of 2021 funding. Additional reporting requirements specific to LIHWAP funding are included in the [Terms and Conditions](#). This request includes the performance measures LIHWAP grantees will be asked to submit to fulfill reporting requirements.

The LIHWAP performance measures include a quarterly reporting process in FY 2022 and FY 2023 followed by annual reports submitted for FY 2022 (Implementation – September 30, 2022) and FY 2023 (October 1, 2022 – September 30, 2023). OCS is working diligently to stand up the new LIHWAP program as quickly as possible, while ensuring that it is an effective and efficient program. In the original request for emergency review of this data collection, OCS noted that quarterly reports would only be used in FY 2022. However, in response to feedback from FRN comments and hearing from some grant recipients that they need to delay their program start dates, OCS has determined it is necessary to conduct quarterly reporting in both FY 2022 and FY 2023.

Quarterly Report Forms

- FY 22 Quarter 1 Report (October 1, 2021 – December 31, 2021)
- FY 22 Quarter 2 Report (January 1, 2022 – March 31, 2022)
- FY 22 Quarter 3 Report (April 1, 2022 – June 30, 2022)
- FY 22 Quarter 4 Report (July 1, 2022 – September 30, 2022)
- FY 23 Quarter 1 Report (October 1, 2022 – December 31, 2022)
- FY 23 Quarter 2 Report (January 1, 2023 – March 31, 2023)
- FY 23 Quarter 3 Report (April 1, 2023 – June 30, 2023)
- FY 23 Quarter 4 Report (July 1, 2023 – September 30, 2023)

Annual Report Forms

Data will be collected in three consolidated distinct Modules:

- **Module 1 (Use of LIHWAP Funds)**
- **Module 2 (LIHWAP Household Report)**
- **Module 3 (LIHWAP Performance Measures)**

In addition to the Quarterly and Annual report, this request includes a burden estimate related to information collected from households. While recipients will collect necessary information from households using a variety of intake systems and local forms, OCS is providing technical assistance in this area and has included a sample application template in supplementary materials (See Attachment A). This is a sample template; there will be no mandated household application format and OCS will not receive or analyze copies of individual household application materials.

2. Purpose and Use of the Information Collection

Below is a summary of the types of information that OCS is seeking authorization to collect, the purpose in collecting these data, and how these data are used. Many components of the LIHWAP Annual Report are modeled after the LIHEAP Annual Report (OMB #0970-0449).

Quarterly Report Forms

The Quarterly Report requires recipients to report on data in multiple sections including: I) total households assisted, II) assistance provided by service type (i.e., restoration of services households, prevention of disconnection of services households, and reducing rates charged households), III) LIHWAP implementation information (i.e., number of water vendors recipient has entered into an agreement with, barriers to vendor agreement execution). Section IV solicits performance management information including self-reported notable accomplishments achieved during the reporting period and additional unmet water and wastewater needs in the service areas. This section also provides recipients space to suggest additional training/technical assistance opportunities OCS could provide. Beginning in Quarter 3 of FY 2022, grant recipients will be asked to include funds obligated by funding source. Please note that the quarterly report in FY 2023 will not include Section III. Both of these changes are discussed in greater detail below in Section 8. The quarterly report is not an abbreviated version of the Annual Report discussed

below, it is a different form that was designed to focus on the LIHWAP implementation process.

The purpose of collecting the quarterly data is to obtain benefits data from all recipients as the program is implemented and executed. These data will be used by OCS to analyze how recipients have chosen to implement the LIHWAP program to address the needs of low-income households. The data will also be used to respond to inquiries from the Congress, HHS, Office and Management and Budget (OMB), White House, and other interested parties in a timely and accurate manner.

Annual Report Forms

The LIHWAP Annual Report is an annual data collection effort conducted by OCS to collect information from LIHWAP recipients to monitor and meet and program objectives. The LIHWAP Annual Report is modeled after the LIHEAP Annual Report and has been streamlined to reduce recipient burden. Data are collected in three distinct Modules:

Module 1 (Use of Funds)

OCS uses Module 1 to collect and report on the recipients' grant award amounts, annual estimates of their sources and uses of LIHWAP household benefit funding (both obligated and expended), and their annual estimates of their uses of LIHWAP outreach/eligibility determination and administration funds.

The purpose of collecting the data for Module 1 is to obtain fiscal and benefits data from all recipients. These data are used by OCS to analyze how recipients have chosen to implement the LIHWAP program to address the needs of low-income households. The data will also be used to respond to inquiries from the Congress, HHS, OMB, White House, and other interested parties.

Module 2 (Household Report)

OCS uses Module 2 to collect and report data by household types in nine sections. Sections 7 and 8 are optional measures and Section 9 is only applicable for recipients that were approved to use 'Non-Public Water Systems for Emergency Home Water Service' funds. The nine sections are as follows:

1. *Number of households.* This measure quantifies LIHWAP's reach by measuring the total number of household applicants, households assisted, and waitlisted households due to non-availability of funds.
2. *Number of Assisted Households by Assistance Type.* This measure quantifies recipients' alignment with OCS' LIHWAP funding priorities. LIHWAP recipients have the flexibility to choose which types of LIHWAP assistance best meet the needs of their low-income households; within allowable uses for LIHWAP funding recipients have been encouraged to consider OCS' priorities. These priorities, in ranked order are: 1) Restoration of services to households that have had drinking water and/or wastewater services disconnected due to arrearages, 2) Prevention of disconnection for households at risk of disconnection due to arrearages, 3) Reducing rates charged to low-income households where possible to help ensure affordable household water services.
3. *Number of Assisted Households by Poverty Interval.* This measure includes the number of assisted households by poverty interval and by assistance type.
4. *Number of Assisted Households by Vulnerable Population.* This measure includes the number of assisted households with a vulnerable member (i.e., elderly, disabled, child age 5 years or under) by assistance type.
5. *Number of Assisted Household Applicants by Race and Ethnicity.* This measure quantifies LIHWAP assisted household applicants by race and ethnicity.
6. *Number of Assisted Household Applicants by Gender.* This measure quantifies LIHWAP assisted household applicants by gender.
7. *Number of Assisted Household Members by Race and Ethnicity.* This measure quantifies LIHWAP assisted household members by race and ethnicity.

8. *Number of Assisted Household Members by Gender.* This measure quantifies LIHWAP assisted household members by gender.
9. *Use of Funds to Non-Public Water Systems for Emergency Home Water Service.* This question is only applicable to recipients that were approved to use ‘Non-Public Water Systems for Emergency Home Water Service’ funds and measures the type of emergency home water service provided.

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

OCS uses the Household Report data to monitor the LIHWAP implementation process and analyze demographic characteristics of assisted households. The data will also be used to respond to inquiries from the Congress, HHS, OMB, White House, and other interested parties.

This information collected in this module will also support equity for individuals belonging to groups that have been historically underserved, marginalized, or subject to discrimination or systemic disadvantage, including those referenced in Executive Order (EO) 13985 (*Advancing Racial Equity and Support for Underserved Communities Through the Federal Government*) by collecting data on race/ethnicity/gender/ disability/income/other key demographic variables, as discussed in section 9 of the EO. This information will allow analyses disaggregated by these variables, to identify impacts for individuals belonging to these groups. The collection of data on the race, ethnicity, and gender of all assisted household members may be burdensome for grant recipients as this data is not currently collected in the Low Income Home Energy Assistance Program. However, OCS has reduced this burden by making these data fields optional for household applicants and members in the first year of reporting before they become mandatory in subsequent years.

Module 3 (Performance Measures)

OCS includes this module to understand the impact of LIHWAP funding on households in reducing water burden, restoring home water service, preventing loss of home water service, and reducing home water service rates.

1. *Water Burden Targeting.* This measure quantifies the proportion (amount) of total household income spent on drinking water and/or wastewater utility bills during a specific timeframe set by the recipient in its written policies (e.g., monthly, quarterly, or annually) for assisted households by type of service: Restoration of water service (disconnected), prevention of loss of home water service, and rate reduction of current home water service.
2. *Restoration of Home Water Service.* This measure quantifies all households assisted with restoration of water services (disconnected) by service type: water or wastewater, multiple water services, and other services.
3. *Prevention of Loss of Home Water Service.* This measure quantifies all households assisted with the prevention of loss of home water service by service type: water or wastewater, multiple water services, and other services.
4. *Rate Reduction of Current Home Water Service.* This measure quantifies all households assisted with each rate reduction of current home water service by service type: water or wastewater, multiple water services, and other services.

OCS uses the Performance Measures data to monitor the LIHWAP implementation process and analyze how federal funds are being used to assist households. The data will also be used to respond to inquiries from the Congress, HHS, OMB, White House, and other interested parties.

Finally, OCS plans to make data from the reports available in a public-facing and user-friendly dashboard. OCS will make the data available on a timely basis following the submission of the quarterly and annual reports.

3. Use of Improved Information Technology and Burden Reduction

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

- Data Collection – OCS will provide recipients with multiple resources to assist with collecting the necessary data to complete the *LIHWAP Quarterly Performance and Management Report* and the *LIHWAP Annual Report*, including instructions and training webinars reviewing data collection procedures. OCS will also furnish one-on-one training and technical assistance to recipients and make such assistance available annually.
- Data Processing – OCS has developed guidance documents to assist recipients with data processing. In addition, the excel files provided calculate some of the data fields, rather than requiring the recipient to do so.
- Data Reporting – The *LIHWAP Performance Data Form* will be collected by OCS using Excel files. As LIHWAP is a temporary supplemental program, this was determined to be the most appropriate technology for immediate use. This is a technology that is familiar and easily accessible to grantees and will allow us to expedite the process by not requiring new system development. Additionally, Excel data can be easily aggregated by OCS for additional analysis.

4. Efforts to Identify Duplication and Use of Similar Information

OCS investigation has revealed no duplicate sources of the grantee-level data elements required for both the LIHWAP Quarterly Performance and Management Report and the LIHWAP Annual Report.

OCS will continue to collaborate with the Environmental Protection Agency, other federal agencies that provide assistance to public water systems and national water associations to identify available data related to public water systems that may be pertinent to OCS' ongoing analysis of LIHWAP impact.

5. Impact on Small Businesses or Other Small Entities

There are three sources of the data sought through this information collection – LIHWAP recipients, LIHWAP sub-recipients (i.e., local agencies), and water vendors. LIHWAP sub-recipients are often small community-based organizations. Plus, some water vendors are small businesses.

LIHWAP recipients consist of states, including the District of Columbia; territories; and Indian tribes and tribal organizations. None of those entities is a small business.

LIHWAP sub-recipients often consist of small, community-based organizations. OCS expects LIHWAP sub-recipients, in their normal course of business, to track LIHWAP funds by federal fiscal year, source, and use. OCS also expects LIHWAP primary recipients to flow down the requirement to track funds appropriated by the Consolidated Appropriations Act of 2021 Act and the American Rescue Plan Act of 2021 and other supplementals to their sub-recipients.

Certain water vendors consist of small businesses. OCS has minimized burden for these grantees by not requiring them to report directly. LIHWAP primary recipients and LIHWAP sub-recipients may collaborate with them to track LIHWAP funds by federal fiscal year, source, and use based on vendor agreements.

6. Consequences of Collecting the Information Less Frequently

OCS is working diligently to stand up the new LIHWAP program as quickly as possible, while ensuring that it is an effective and efficient program. OCS has determined that quarterly progress updates will be essential to allow OCS to identify areas for necessary technical assistance, assess progress among recipients, and provide a format for consultation with recipients regarding areas of challenges and opportunities. Quarterly reports will also help OCS ensure that all funds are obligated by the statutory deadline of September 30, 2023.

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 expedited OMB review of this information collection activity. This notice alerted the public to a request for emergency approval for six months of data collection and provided a sixty-day comment period related to the full request that will be submitted to continue data collection beyond six months.

In conjunction with the publication of the Federal Register Notice (86 FR 59166), OCS published the proposed quarterly and annual report instruments for public comment. In response to this publication and opportunity for comment, OCS received four sets of comments. Two were letters from consortia of consumer and environmental advocacy organizations, one was a letter from a national association that serves as an education and policy organization for the state directors of LIHEAP and LIHWAP, and the final comment was a single online comment from a member of the general public.

Each of the letters from the national associations and advocacy organizations contained multiple recommendations related to the content, frequency, and potential organization and analysis of data. OCS conducted a detailed review of all recommendations. In order to assure that each specific recommendation was considered and that decisions about each recommendation were documented, a workbook was created documenting each recommendation, the organization or organizations submitting comments, a change decision, and notes on the reason a change was made or not made in response to the recommendation.

A detailed summary of comments received is attached as Appendix 1.

Recommendations Requiring No Change

Some recommendations required no change in OCS plans. For example, some commenters recommended that OCS make data available online in an easy-to-understand dashboard. OCS concurs with this recommendation and does plan to make data from the reports available in a public-facing dashboard. OCS will make the data available on a timely basis and in a user-friendly format.

Report Form Changes Made in Response to Comments

Key changes made in response to public comments included the following:

- OCS corrected two formatting issues, in which a document cut-off or was missing text;
- A formula calculation issue noted in one cell in the Quarter 4 spreadsheet was corrected;
- OCS concurred with a recommendation to add additional financial obligation information to the quarterly report starting in quarter three of Fiscal Year 2022;

- OCS corrected the definition of Multiple Water Services on both the Quarterly and Annual Report Forms and clarified the use of funds related to non-water utility services;
- OCS concurred with a recommendation to add the demographic request to include households served by housing type separated by homeowners and renters. This indicator will be added to the Annual Report Form for FY 2023.

Other Recommendations Considered with No Change to Report Forms

OCS also received multiple recommendations for additional or more detailed collection of data that OCS concurred could be potentially-valuable, but that were determined not to be feasible within the current emergency grant effort. In many instances, OCS balanced the consideration of the potential value of additional or more detailed breakdown of data against the additional burden or operational challenges associated with the recommendation and determined that the recommendations were not feasible.

Recommendations considered, but resulting in no changes to the forms included the following:

- OCS considered a recommendation to add additional data collection about customers who applied for and did not receive assistance, as well as information on individuals who did not apply for assistance, and data on the amount that waitlisted households would have been eligible for if resources had been available. While OCS concurs with the value of information on unmet need, it was determined that it would not be feasible to request and receive consistent and reliable data on waitlisted households in this emergency effort and the amount for which these households would have been eligible. However, OCS has already included narrative questions related to unmet water and wastewater needs, which will be analyzed.
- OCS considered recommendations to require aggregation of data at the municipal or county levels, or a vendor-by-vendor or utility service area basis. While OCS recognizes the potential value of local, vendor-level, or additional quarterly data, the potential value of this information was balanced against the significant additional burden and operational challenges of requiring all grant recipients to organize data in this way in the upcoming quarterly and annual reports for an emergency effort.

Comments Regarding Quarterly Reporting

OCS also considered conflicting recommendations related to quarterly reporting. Two sets of comments (one from the association representing state directors of LIHEAP organizations and one from the general public) expressed concern about the expectation for quarterly reports. Other recommendations from consumer and environmental advocacy organizations recommended additional quarterly data collection or additional breakdown of data in annual reports on a quarterly basis. On balance, OCS determined that the current proposed quarterly collection (with the addition of financial obligation data) would provide critical information for federal program management and oversight purposes, but that additional information at the level of detailed recommended by the advocacy organizations would not be feasible in the current effort. Additionally, OCS agrees with feedback received from the National Consumer Law Center and the Natural Resources Defense Council that quarterly reporting should be continued in FY 2023 rather than sunset after the first program year. Given that OCS expects all LIHWAP programs will have implemented their programs and started accepting applications by quarter 1 in FY 2023, Section III on implementation information will be removed from the quarterly report in FY 2023.

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 will not be collecting Personal Identifiable Information (PII). Grantees and subgrantees may collect PII and the confidentiality of this data would be subject to their own state/tribal/territory privacy laws.

11. Justification for Sensitive Questions

No sensitive questions are asked in this data collection.

12. Estimates of Annualized Burden Hours and Costs

Estimates for the Quarterly and Annual reports below are based on the expertise of OCS staff with professional experience administering water and energy assistance programs at the state and local level. Estimates for the LIHWAP household application burden are based on a review of expected benefit levels from a randomly selected sample of grantees. The estimated burden hours associated with all elements of the data collection are shown in the table below:

QUARTERLY PERFORMANCE AND MANAGEMENT REPORT (FY 2022)

	Number of Respondents	Number of Responses Per Quarter	Average Hour Burden Per Year*	Total Annual Burden Hours	Average Hourly Wage Rate	Total Annual Respondent Cost
<i>Quarterly</i>						
State Recipients	50	1	52	2,600	\$72.46	\$188,396
Territory Recipients	5	1	52	260	\$72.46	\$18,840
Tribal Recipients	102	1	52	5,304	\$72.46	\$384,328
Total Annual Burden Hours				8,164	\$72.46	\$591,563

*Note: this is an average total hour burden estimate for completing all four quarterly reports per year. OCS anticipates that the first quarter may take longer than subsequent quarters and that on average recipients will spend 52 hours per year on the quarterly reports.

QUARTERLY PERFORMANCE AND MANAGEMENT REPORT (FY 2023)

	Number of Respondents	Number of Responses Per Quarter	Average Hour Burden Per Year*	Total Annual Burden Hours	Average Hourly Wage Rate	Total Annual Respondent Cost
<i>Quarterly</i>						
State Recipients	50	1	40	2,000	\$72.46	\$144,920
Territory Recipients	5	1	40	200	\$72.46	\$14,492
Tribal Recipients	102	1	40	4,080	\$72.46	\$295,637
Total Annual Burden Hours				6,280	\$72.46	\$455,049

*Note: OCS estimates that quarterly reporting burden for grant recipients will be reduced in FY 2023 due to the removal of Section III and lessons learned/efficiencies generated from the first year of quarterly reporting.

ANNUAL RESPONDENT BURDEN AND COST ESTIMATES FOR LIHWAP ANNUAL DATA FORM

	Number of Respondents	Annual Number of Responses Per Respondent	Average Hour Burden Per Response	Total Annual Burden Hours	Average Hourly Wage Rate	Total Annual Respondent Cost
Module 1 (Use of Funds)						
State Recipients	50	1	21	1,050	\$72.46	\$76,083
Territory Recipients	5	1	21	105	\$72.46	\$7,608
Tribal Recipients	102	1	21	2,142	\$72.46	\$155,209
Module 2 (Household Report)						
State Recipients	50	1	100	5,000	\$72.46	\$362,300
Territory Recipients	5	1	100	500	\$72.46	\$36,230
Tribal Recipients	102	1	100	10,200	\$72.46	\$739,092
Module 3 (Performance Measures)						
State Recipients	50	1	90	4,500	\$72.46	\$326,070
Territory Recipients	5	1	90	450	\$72.46	\$32,607
Tribal Recipients	102	1	90	9,180	\$72.46	\$665,183
Total Annual Burden Hours				33,127	\$72.46	\$2,400,382

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for social and community service managers [11-9151] and wage data from May 2020, which is \$36.23 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$72.46. <https://www.bls.gov/oes/current/oes119151.htm>

ANNUAL RESPONDENT BURDEN AND COST ESTIMATES FOR LIHWAP HOUSEHOLD APPLICATIONS*

	Number of Respondents	Number of Responses Per Respondent	Average Hour Burden Per Response	Total Burden Hours	Annual Burden Hours
Household Applications (Based on Sample Application Tool)					
Household Applicants	1,200,000	1	.5	600,000	200,000

*As noted above in Section 1, grantees will use a variety of household application forms and procedures. There is no mandated form for application materials and grantee household application materials will not be submitted to OCS. However, we have included a sample application and burden estimate. The burden estimates provided in this submission are based on the sample application form. The actual burden will vary based on grantee procedures. For example, because OCS is encouraging grantees to consider categorical eligibility, which may include intake with LIHEAP and other programs, the actual burden on households applying for LIHWAP may be shared with other programs for which categorical eligibility is allowed.

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

The data collection procedures should not require any capital expenditures by recipients, sub-recipients, or water vendors that are not covered under the allowable 15% administrative portion of the LIHWAP grant and the intake/eligibility assessment costs allowed under the grant.

14. Annualized Cost to the Federal Government

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

1. Recipient Communications – Notifying recipients of the reporting requirement and conducting follow-up with recipients.
2. Report Review – Reviewing submitted reports and working with recipients to furnish reliable data.
3. Analysis and Reporting – Conducting analysis of the reported data and reporting as needed.

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 Communications & Training	316	\$111.50/hour	\$35,234
Grantee Report Review	395	\$111.50/hour	\$44,043
Analysis and Reporting	400	\$111.50/hour	\$44,600
Subtotal:			\$123,877

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	300	\$63.65	\$19,095
Analysis and Reporting	250	\$63.65	\$15,913
Technical Assistance	320	\$84.87	\$27,158
		Subtotal:	\$62,166

Total annual federal government costs are **\$186,043**

15. Explanation for Program Changes or Adjustments

This request is to extend approval of LIHWAP quarterly and annual reports. Revisions include continuing quarterly reporting through FY 2023 and edits to the reports, as described in A8 above and in Appendix 1.

16. Plans for Tabulation and Publication and Project Time Schedule

The Quarterly report will be used primarily for internal analysis and internal administration progress updates. On a limited basis, quarterly data will be used to provide updates to Congressional appropriators. Because LIHWAP is not a permanent appropriation, there is no statutory report the data to Congress; however, OCS will use data from both reports to respond to requests for information from the Congress, HHS, and White House. OCS will also be developing additional plans to make the data

available to the general public.

Activity	Weeks Following Report Submission Deadline
Analysis of Quarterly Report and preparation of any necessary follow-up with grantees	4 Weeks
Completion of quality assurance testing on performance measures data for Annual Report (requires review of data inconsistencies and outliers with recipients)	8 Weeks
Synthesis of data into aggregated results and performance outcomes	12 Weeks
Drafting and completion of reports for public sharing or Congressional committees on an as needed basis	16 Weeks

* Publication is dependent upon the Department's clearance process of the data

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

The Quarterly and Annual reports will display the OMB expiration date. There are no specific forms associated with the burden for the household applications.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

None.