

**Low Income Household Water Assistance Program (LIHWAP)
Program Development**

**Formative Data Collections for Program Support for ACF
Program Support**

**OMB Information Collection Request
0970-0531**

**Supporting Statement Part A -
Justification**

March 2021

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 is requesting approval to collect information under the umbrella generic: Formative Data Collection Instrument for ACF Program Support (0970-0531). The goal of the information collection is to inform the development of a new program: the Low Income Household Water Assistance Program. The proposed survey will be distributed to grantees, stakeholders, and tribes in order to understand interpretations of authorizing legislation, identify timeframes after award needed for grantees to begin program implementation, and to identify potential challenges and barriers related to grantee program administration.

1. Circumstances Making the Collection of Information Necessary

The Consolidated Appropriations Act, 2021 (Public Law No: 116-260) signed on December 27, 2020, included \$638,000,000 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 assist low-income households, particularly those with the lowest incomes, that pay a high proportion of household income for drinking water and wastewater services, by providing funds to owners or operators of public water systems or treatment works to reduce arrearages of and rates charged to such households for such services. As a result, ACF is planning a new program, the Low Income Household Water Assistance Program (LIHWAP).

Grants will be issued and administered by the Office of Community Services (OCS), which administers the Low Income Home Energy Assistance Program (LIHEAP) and other programs designed to reduce the causes of poverty, increase opportunity and economic security of individuals and families, and revitalize communities.

Congress instructed that “in carrying out this appropriation, the Secretary, States, and Indian Tribes, as applicable, shall, as appropriate and to the extent practicable, use existing processes, procedures, policies, and systems in place to provide assistance to low-income households, including by using existing programs and program announcements, application and approval processes.” Consistent with these Congressional instructions, ACF will be closely modeling the procedures and requirements for this funding on existing programs such as LIHEAP and other related programs.

Due to the absence of rules related specifically to LIHWAP, OCS must establish the existing rules that will be applied to LIHWAP. In doing so, OCS wants to allow grantees and stakeholders the opportunity to identify how the application of existing processes, procedures, policies, and systems will impact their ability to successfully administer the LIHWAP program, and to provide estimated timeframes for adapting their own policies and procedures in response to this program.

The emergency nature of relief that will be provided by LIHWAP is essential to families that have been impacted by the COVID pandemic. Therefore, OCS is requesting the use of the generic as a means to expeditiously gather input from grantees and stakeholders to support effective and efficient program implementation.

This proposed information collection meets the following goals of ACF's generic clearance for formative data collections for program support (0970-0531):

- Delivery of targeted assistance related to program implementation or the development or refinement of program and grantee processes, and the development and refinement of recordkeeping and communication systems.
- Planning for provision of programmatic training or technical assistance (T/TA).
- Obtaining grantee or other stakeholder input on the development of program performance measures.

2. Purpose and Use of the Information Collection

This proposed information collection includes one survey, the Low-Income Home Water Assistance Program (LIHWAP) Input Survey. Information collected by the LIHWAP Input Survey will be used to inform program design. OCS will assess responses to guide the adaptation of existing Low-Income Household Energy Assistance Program (LIHEAP) terms and conditions for LIHWAP to ensure the program office is not creating unintended challenges or barriers. OCS will also use responses to inform the development of the LIHWAP grantee implementation plan, reporting requirements, technical assistance needs, and to understand the timeframe needed for grantees to administer funds to eligible households. Finally, comments on the proposed LIHWAP Grantee Model Plan will be requested through this survey to allow OCS to gain quick feedback prior to submitted a request to OMB for expedited review and approval of the LIHWAP Plan.

OCS will hold informational conference calls for state and tribal grantees, and stakeholders. During the calls OCS will review LIHWAP authorizing legislation and describe methods that will be employed to apply existing policies, procedures, and systems to grant awards. OCS plans to administer the survey as a follow up, allowing participants a specific timeframe following the call to submit responses.

Grantee and stakeholder replies will be assessed for common themes related to the use of existing policies, procedures, processes, and systems. OCS will also review responses for challenges that may be addressed in program design, and to understand time required for grantees to provide LIHWAP services to eligible households.

3. Use of Improved Information Technology and Burden Reduction

The survey will be administered through an online survey program, such as Survey Monkey.

4. Efforts to Identify Duplication and Use of Similar Information

The LIHWAP Input Survey will not duplicate any other work by ACF. This will be the only instrument for collecting information related to LIHWAP program design and implementation.

5. Impact on Small Businesses or Other Small Entities

This data collection does not impact small business or other small entities.

6. Consequences of Collecting the Information Less Frequently

This is a one-time data collection, specific to the design of LIHWAP to be administered in advance of issuing ACF awards for this program.

7. Special Circumstances Relating to the Guidelines of 5 CFR 1320.5

There are no special circumstances for proposed data collection effort.

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 the overarching generic clearance for formative information collection. This notice was published on October 13, 2020, Volume 85, Number 198, page 64480, and provided a sixty-day period for public comment. During the notice and comment periods, no substantive comments were received.

9. Explanation of Any Payment or Gift to Respondents

No payment or gift will be provided to respondents.

10. Assurance of Confidentiality Provided to Respondents

Information collected will be kept private to the extent permitted by law. Respondents will be informed of all planned uses of data, that their participation is voluntary, and that their information will be kept private to the extent permitted by law.

11. Justification for Sensitive Questions

This information collection does not include questions of a sensitive nature.

12. Estimates of Annualized Burden Hours and Costs

Respondents to the LIHWAP Input Survey will include individuals from state, territory and tribal grantees, and other stakeholders who attend an OCS-led informational conference call specific to LIHWAP. The survey will be administered following the conference calls. OCS anticipates up to 300 participants on these conference calls and estimates responses on the survey from 220 participants. The average time to complete the survey is 50 minutes.

| Information Collection Title | Total Number of Respondents | Total Number of Responses Per Respondent | Average Burden Hours Per Response | Total Burden Hours | Average Hourly Wage | Total Cost |
|------------------------------|-----------------------------|--|-----------------------------------|--------------------|---------------------|------------|
| LIHWAP Input Survey | 220 | 1 | .8 | 176 | \$64.56 | \$11,363 |

The estimated annual cost is based upon the average hourly salary for social and community service managers, job code 11-9151 based on May 2019 Occupational Employment Statistics from the Bureau of Labor and Statistics¹. We anticipate most respondents to be grantees, which is the basis for the job code. We may have a few stakeholder respondents, which we estimate using the same code. The base wage is equal to the mean salary of \$32.28 per hour. The base wage was multiplied by two to calculate wage plus fringe benefits and overhead.

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

There are no additional costs to respondents.

14. Annualized Cost to the Federal Government

The annual cost to the Federal Government is shown in the following table:

| AGENCY Office of Community Services | Hourly Wage | Total Burden Hours | Total Cost |
|-------------------------------------|-------------|--------------------|------------|
| GS-13 Program Specialist | \$37.70 | 50 | \$1,885.00 |
| GS-15 Program Branch Chief | \$52.40 | 50 | \$2,620.00 |
| Contractor Staff | \$43.71 | 40 | \$1,748.00 |
| Total | | | \$6,253.00 |

¹ <https://www.bls.gov/oes/current/oes119151.htm>

Costs to the Federal government include a portion of the annual salaries for a GS-13 Program Specialist, and two GS-15 Program Branch Chiefs, to develop and implement the survey. A portion of a contracted staff position estimated based on the annual salary for a 15-1211 Computer Systems Analysts is also included to support survey development, preparing and assessing survey data.

15. Explanation for Program Changes or Adjustments

This is for an individual information collection under the umbrella formative generic clearance for program support (0970-0531).

16. Plans for Tabulation and Publication and Project Time Schedule

OCS is working to expedite grantee awards based on the emergency nature of this program. Therefore, the plan is to hold conference calls within one week of OMB approval of the survey. There will be one call open to all grantees and stakeholder groups, and a separate call for tribes. The survey will be distributed as an immediate follow up to the calls. Grantees will be provided 2 business days to reply. Replies will be compiled and assessed within one week of receipt.

OCS does not plan to publicly share information collected, instead the information will be used to inform program design and implementation.

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

The expiration date for OMB approval will be displayed.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

No exceptions to the certification statement are necessary.