

Appendix 1. Federal Register Notice Comments & Responses

#	Commentor	Comment	Change Decision	Change Notes
1	Port Gamble S'Klallam Tribe	The proposed reporting is not required under 42 U.S.C. § 8621. 42 U.S.C. § 8624 gives the Secretary broad authority to collect data under LIHEAP. However, that authority does not extend so far as “to require the Secretary to collect data which has been collected and made available to the Secretary by any other agency.” Various LIHEAP information is already being reported by the Tribe in three separate reports: the annual financial report, the household data report form, the annual carryover report. It is unduly burdensome and unnecessary to require this additional report when the information is already being provided in other required LIHEAP reports.”	Change	OCS is implementing LIHEAP Quarterly Reporting to help strengthen the program and improve our ability to highlight the impact LIHEAP is having on households across the country. In designing this report, OCS strived to only ask for the information we absolutely need to minimize the reporting burden for grant recipients to the greatest extent possible. The quarterly reports will help OCS track key information in near real time. Currently, OCS does not receive comprehensive performance and management data until approximately three months after the end of each federal fiscal year. The LIHEAP Quarterly Report will assist OCS in receiving data and information about LIHEAP during the federal fiscal year. This almost real time data will be particularly important this year as LIHEAP grant recipients both administer historical levels of LIHEAP funding and develop and implement plans to reach the most vulnerable households amidst ongoing energy price increases. Now and in future years, these reports will be critical in helping us address challenges in a timely manner including unmet T/TA needs, approaching obligation deadlines, and challenges related to outreach and intake such as reaching newly eligible populations. However, OCS understands the concerns regarding reporting burden, particularly for our Tribal grant recipients with the smallest awards. Therefore, OCS will only require that Tribes with non-supplemental annual block grant allocations under \$50,000 submit Section I, V, VI (total households assisted, remarks,

				and certification), all other report sections will be optional.
2	Port Gamble S'Klallam Tribe	We strongly suggest that the U.S. Department of Health and Human Services work with tribes individually to determine how to effectively compile information already submitted in other reports. Specifically, we request amending the already existing, required reports to include information on the performance measures rather than adding an additional report with a quarterly requirement to include this data.	Change	As noted above, OCS has determined that regular quarterly reporting is essential to strengthening LIHEAP. OCS is committed to working with all our grant recipients, particularly Tribal grant recipients (with non-supplemental annual block grant awards over \$50,000) and territory grant recipients who are being asked to report performance measures for the first time, to help them compile the required information as efficiently as possible. As indicated above, Tribal grant recipients with non-supplemental annual block grant awards under \$50,000 will not have to report performance measures or any other data other than what is required in Section I, V, VI (total households assisted, remarks, and certification), all other report sections will be optional.
3	Citizen Potawatomi Nation	The additional reporting burden proposed in this notice is unnecessary. The proper performance of the agency, including oversight and successful administration of programs funded by normal and ARPA supplemental funds will not be enhanced by the institution of additional quarterly reports. Grantees will be overwhelmed by an increased burden not-in-proportion to the meager additional awards they have received, and the flood of new reports will not be used by the agency in a timely fashion. This proposal amounts to widget counting with no practical utility. The existing annual reporting structure for LIHEAP is sufficient and should be maintained.	Change	OCS acknowledges and appreciates the concerns regarding reporting burden. During the design of the quarterly report, OCS strove to ensure that the data being requested was absolutely essential and for the data that OCS will utilize. As explained above, to alleviate burden on our Tribal grant recipients with the smallest awards, OCS is only requiring Tribes with non-supplemental annual block grant awards under \$50,000 to report the data in Section I, V, VI (total households assisted, remarks, and certification), all other report sections will be optional. OCS also remains committed to working with any grant recipient that anticipates experiencing challenges with the quarterly reporting burden. OCS has determined that quarterly reporting is essential to our oversight and administration of LIHEAP and will be analyzing all quarterly report data in a timely fashion to inform our ongoing training and technical

				assistance work. OCS also plans to publicly release data gleaned from the quarterly report within 30-60 days of the submission deadline in a format similar to the Low-Income Household Water Assistance Program Dashboard. Please note, OCS encourages Tribes with annual block grant awards under \$50,000 that have the capacity to submit the full report. Submitting all data will allow the Tribal grant recipient to have more data featured in the LIHEAP Dashboard.
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