

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

**OMB Information Collection Request  
0970 - 0075**

## **Supporting Statement Part A - Justification**

**January 2024**

**Type of Request: Reinstatement with Changes**

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

## **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.

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)). OCS has responsibility to review and accept LIHEAP Plan submissions on behalf of ACF, which is the agency that administers LIHEAP at the federal level.

This revision request includes a request to extend approval of the current form without any changes through August 31, 2024 and to incorporate proposed changes beginning in Fiscal Year (FY) 2025. For FY2025, OCS is proposing substantive changes, including additional form clarification, edits, more detailed reporting on program components, categorical eligibility, monitoring practices, and program integrity (see [Attachment A](#)). Updates are intended to provide OCS with additional information about how grant recipients are fulfilling 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 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. The Model Plan contains the 16 assurances signed by the chief executive officer, the plan also contains information required by section 2605(c), required reports, additional certifications, and if a consortium is applying, resolutions from member tribes. When HHS determines that an application is complete, a grant award is issued. The approved Model Plans is uploaded on the LIHEAP Clearinghouse website, which is public facing.

### **3. Use of Improved Information Technology and Burden Reduction**

OCS collects grant recipient Model Plans using the ACF Grant Solutions/Online Data Collection (OLDC) system, which is a web-based reporting tool. Grant recipients are already using Grant Solutions/OLDC to submit their annual LIHEAP Household Reports (OMB #: 0970-0060) and SF-425 Federal Financial Report, and OCS 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 grant recipient 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 grant recipient'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. Grant recipients will only need to make updates to their prior year's entries as needed, meaning a reduction in overall grant recipient burden.

### **4. Efforts to Identify Duplication and Use of Similar Information**

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**

Grant recipients 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, OCS 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 OCS 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 October 2, 2023 (88 FR 67760) and provided a sixty-day period for public comment. During the notice and comment period, one document with several comments were received, which are included with this submission. Also attached is OCS’ response to these comments and changes that were made to the FY 2025 Model Plan form.

**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. No personal information is requested.

**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, OCS anticipates that all existing LIHEAP grant recipient (207 grant recipient) will complete Model Plan applications to apply for federal funds. We estimate it will take grant recipient a half hour to complete their Model Plan application for FY24, an hour for FY25, and return to a half hour for FY26. This includes the time for reviewing previous applications, gathering the data needed, and reviewing the completed application. The estimated time per response for the FY2025 Model Plan has been increased based on the proposed revisions. The estimated time per response for the FY2026 Model Plan will reduce back after revisions are in place and respondents can duplicate responses in OLDC. We estimate the annual cost to respondents based on an hourly labor cost of \$20.00 per hour. To account for fringe benefits and overhead the rate was multiplied by two, which is \$40.00. The estimate of annualized cost to respondents for hour burden is  $\$4,140 + \$8,240 + 4,140 = \$16,560/3 = \$5,520$ .

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 2022 <https://www.bls.gov/oes/><https://www.bls.gov/oes/current/oes211093.htm>. To account for overhead and fringe benefits, the average hourly wage was multiplied by two.

Information Collection Title	Total/Annual Number of Respondents	Total/Annual Number of Responses Per Respondent	Average Burden Hours Per Response	Annual Burden Hours	Average Hourly Wage	Total Annual Cost
LIHEAP Detailed Model Plan Application - FY24	207	1	.5	103.5	\$40.00	\$4,140
LIHEAP Detailed Model Plan Application - FY25	207	1	1	207	\$40.00	\$8,280

LIHEAP Detailed Model Plan Application -FY26	207	1	.5	103.5	\$40.00	\$4,140
Totals:				415		\$16,560

**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**

OCS 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 grant recipients 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 206 applications, the federal salary costs each year will be about \$46,597 (6 hours x 206 applications x 37.70).

**15. Explanation for Program Changes or Adjustments**

OCS is requesting substantive changes in FY2025 so LIHEAP grant recipients can provide additional information about how they are fulfilling the statutory requirements. These changes impact burden estimates, as described in section A12.

**16. Plans for Tabulation and Publication and Project Time Schedule**

All LIHEAP Grant recipients are required to submit their Model Plan Application through OLDC by September 1 (annually). Copies of each final grant recipient 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.