

# **Low Income Home Energy Assistance Program (LIHEAP) Annual Report on Households Assisted**

**OMB Information Collection Request  
0970 - 0060**

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

**November 2022**

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, P. L. 97-35. The Office of Community Services (OCS) within the Department of Health and Human Services' (DHHS) Administration for Children and Families (ACF) administers LIHEAP at the Federal level.

The LIHEAP Household Report is an annual data collection effort conducted by OCS to collect information from LIHEAP grantees to meet statutory requirements and program objectives. The LIHEAP statute requires the collection of data on the number of households assisted, their income levels, and vulnerability group, by type of LIHEAP assistance, for inclusion in the Secretary's annual LIHEAP Report to Congress. The data are collected through the LIHEAP Household Report, which consists of the following: (1) a Long Format for state grant recipients, the District of Columbia, and select territory grant recipients, and (2) a Short Format for tribal grant recipients and select territory grant recipients.

OCS is requesting substantive changes to the LIHEAP Household Report, including the addition of reporting requirements for assisted applicants and household member demographic characteristics on the Household Report Long Form and Short Form, and the removal of reporting requirements collecting counts of applicant households by assistance type and poverty interval on the Household Report Long Form.

## **2. Purpose and Use of the Information Collection**

The statutory purpose and use of the LIHEAP Household Report includes the following:

- LIHEAP grantees are required to report the estimated or final data contained in the previously approved LIHEAP Household Report as part of their annual application for LIHEAP funds, as required by Section 2605(c)(1)(G) of the Act (42 U.S.C. 8624). If reporting estimated data, the grantee is required to submit a final Household Report no later than December 31st.
- OCS prepares the data on assisted households for inclusion in the Department's annual LIHEAP Report to Congress, as required by Section 2610(a)(4) and (5) and section 2610(b) of the Act (42 U.S.C. 8629). The data are used for Congressional oversight and in response to Congressional and White House queries on case load statistics and demographic characteristics of LIHEAP households.
- The data on heating assisted households containing at least one member who is elderly or a young child are used in calculating LIHEAP reciprocity targeting performance measures, under the Government Performance and Results Act (GPRA) of 1993 (31 U.S.C. 1101) and the President's annual Congressional Justification.
- To provide separate tracking and reporting of the following:

- o Number of households by owner/renter status (own, rent with utilities billed separately, rent with utilities in rental fee, other). (Optional for FY 2023 reporting and required for FY 2024 reporting.)
- o Number of Assisted Applicants by Ethnicity. (Required for FY 2023 reporting.)
- o Number of Assisted Applicants by Race. (Required for FY 2023 reporting.)
- o Number of Assisted Household Applicants by Gender. (Required for FY 2023 reporting.)
- o Assisted Household Members by Ethnicity. (Optional for FY 2023 reporting and required for FY 2024 reporting.)
- o Assisted Household Members by Race. (Optional for FY 2023 reporting and required for FY 2024 reporting.)
- o Number of Assisted Household Members by Gender. (Optional for FY 2023 reporting and required for FY 2024 reporting.)

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

All grantees reports are submitted through the Administration of Children and Families’ On-Line Data Collection System (OLDC). Instructions for completing the form are built into the form itself, through hyperlinks.

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

Household income levels and presence of elderly, disabled, or young children can be estimated at the national and regional levels for the households receiving heating assistance from two national household surveys—the Annual Social and Economic Supplement (ASEC) to the Current Population Survey (conducted by the U.S. Bureau of the Census) and the Residential Energy Consumption Survey (conducted by the U.S. Energy Information Administration). However, national household surveys do not provide reliable State-level data on any type of LIHEAP assistance, or data in a timely manner to comply with LIHEAP statutory reporting requirements. Also, these surveys underestimate the number of households receiving heating assistance due to underreporting and sampling error. There is no other similar information collection that can be modified to provide the data.

Statistics suggest that there is a relatively high “false positive” rate in states that have ratepayer-funded energy assistance programs that do not require participation in LIHEAP. In some states, the ratepayer-funded programs are directly tied to LIHEAP and in others they are completely separate. As such, the information collected in household surveys that ask about receipt of “energy assistance” including the CPS and the RECS do not furnish useful information about the number of households that receive LIHEAP or the characteristics of those household.

The RECS is only implemented once every five years and it takes more than 3 years to process the data.

**5. Impact on Small Businesses or Other Small Entities**

No small business entities are involved in the data collection.

**6. Consequences of Collecting the Information Less Frequently**

The deadline for LIHEAP grantees to submit their block grant applications/plans for the following fiscal year is September 1st of the current fiscal year. Part of the block grant application requires the annual fiscal year data that are reported in the LIHEAP Household Report. Consequently, grantees would be unable to comply with statutory requirements in section 2605(c)(1)(D) of the LIHEAP statute (42 U.S.C. 8624(c)(1)(G) and 8629(a)(4), (a) (5), (b), and (c)) if the data were collected less frequently.

Without the grantees' annual reporting of the LIHEAP household data, HHS would be unable to complete its annual LIHEAP Report to Congress, as required by section 2610(b) of the LIHEAP statute (42 U.S.C. 8629).

There would be no way for OCS to track annual LIHEAP performance output.

Finally, OCS also would be unable to obtain data that are necessary in calculating LIHEAP reciprocity targeting and outcome developmental performance measures that are included in the President's annual Congressional Justification.

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

There are no special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.5.

**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 July 1, 2022, Volume 87, Number 126, page 39523, and provided a sixty-day period for public comment.

During the public comment period, OCS received a request for the LIHEAP Household Report and Report instructions and two sets of comments, one from a tribal grant recipient

and another one from a state grant recipient. The grant recipients expressed concerns about additional burden entailed by the request for demographic and housing type information. See Appendix 1 for detail about the comments received and OCS’s responses to comments. In summation, OCS recognizes the demographic and housing type information add to the grant recipients reporting burden; however, we have determined this data is essential to evaluate if LIHEAP is serving households equitably. To minimize the burden during the development of requesting this additional reporting, OCS worked to reduce the reporting burden to the greatest extent possible by removing reporting requirements for applicant households by poverty level.

**9. Explanation of Any Payment or Gift to Respondents**

No payment or gifts to respondents are involved.

**10. Assurance of Confidentiality Provided to Respondents**

Confidentiality is not an issue as only aggregated household data are collected.

**11. Justification for Sensitive Questions**

There are no questions of a sensitive nature that are commonly considered private.

**12. Estimates of Annualized Burden Hours and Costs**

Estimates of the hour burden of the collection of information are based on the number of LIHEAP grantees (50 States, the District of Columbia, 160 Indian Tribes/Tribal Organizations, and five Insular Areas) completing the information collection annually.

The response burden on respondents varies based on the following:

- The *LIHEAP Household Report – Long Format* for the 50 States, the District of Columbia, and selected territory grantees (average burden per response of 67 hours).
- The *LIHEAP Household Report – Short Format* for the 151 Indian Tribes/Tribal Organizations and selected territory grantees (average burden per response of 10 hours).

Annual Burden Estimates for *LIHEAP Household Report*

Instrument	Number of Respondents	Annual Number of Responses Per Respondent	Average Hour Burden Per Response	Annual Burden Hours
Long Format	56	1	67	3,752
Short Format	151	1	10	1,510

Instrument	Number of Respondents	Annual Number of Responses Per Respondent	Average Hour Burden Per Response	Annual Burden Hours
Household Application*	6,160,000	1	1	6,160,000
Total Annual Burden Hours				6,165,262

The variance in burden is due to the Department waiving most of the reporting requirements for small LIHEAP grantees, given the small grant amounts involved and the overall difficulty in obtaining reliable demographic data from small grantees. In reducing the burden on small LIHEAP grantees, all Indian Tribes and Tribal Organizations will continue to be exempted from most of the reporting requirements. These grantees report only on the number of households assisted by type of LIHEAP assistance through the *LIHEAP Household Report–Short Format*.

\*Please note that the above estimate accounts for the burden this data collection entails on LIHEAP applicants. In previous years, OCS has not included an estimate of the burden on households. While OCS does not mandate that LIHEAP grant recipients use a standard household application, we know that grant recipients collect many of the required Household Report data elements through their household application. The annual burden for the household application indicated above accounts for the time it will take LIHEAP applicants to provide the data required by the current Household Report as well as the proposed demographic data elements. To calculate this burden, we used an estimate for the annual number of LIHEAP household applicants multiplied by an average of an hour to provide the data required by the Household Report.

To minimize reporting burden to the greatest extent possible, and in recognition of the significant overlap in LIHEAP and LIHWAP grant recipients, OCS is proposing to use the same demographic measures included in the LIHWAP Annual Report in the LIHEAP Household Report. OCS has also removed the reporting requirements for applicant households by assistance type and poverty interval on the Household Report Long Form to offset some of the additional reporting burden entailed by the demographic data collection.

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 annual costs for respondents for each format of the *LIHEAP Household Report* are estimated as follows:

- For the LIHEAP Household Report–Long Format, OCS estimates that the total annual cost for all respondents is \$208,824, per each individual respondent the estimated annual cost is \$3,729

Staff	Number of respondents	Average # hours per respondent	Average \$ per hour	Total cost
Reporting	56	40	\$75	\$168,000
Recordkeeping	56	27	\$27	\$40,824
Total Cost				\$208,824

- For the LIHEAP Household Report–Short Format, OCS estimates the total annual cost for all respondents is to be \$84,258, per each individual respondent the estimated annual cost is \$558.

Staff	Number of respondents	Average # hours per respondent	Average \$ per hour	Total Cost
Reporting	151	6	\$75	\$67,950
Recordkeeping	151	4	\$27	\$16,308
Total Cost				\$84,258

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

Respondents will not incur any additional record keeping costs.

### 14. Annualized Cost to the Federal Government

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

1. Preparing the Action Transmittal reminding grant recipients of posting requirements.
2. Overseeing the work of the contractor.

The table below furnishes information on the estimated Federal Staff hours and costs associated with each task:

Cost Item	Hours	Salary (per hour)	Total
GS-13: (a) prepare an Action Transmittal reminding grantees of the reporting requirement, (b) oversee the work of the contractor.	200	\$111.50	\$22,300
Contractor Cost: (a) oversee the collection effort and prepare statistical tables (b) prepare tables with footnotes for final publication in the Report to Congress.	176	\$83.79	\$14,747.04
Total			\$37,047.04

### 15. Explanation for Program Changes or Adjustments

ACF changed the LIHEAP Household Report form to the existing data collection to align with the Biden-Harris administration’s priorities regarding equity. The proposed additions will provide OCS with critical data that is needed to evaluate if LIHEAP is equitably serving communities across the country. The collection of demographic data including owner/renter status, race, ethnicity, and gender will allow OCS to conduct analysis disaggregated by these variables to assess whether LIHEAP resources are equity distributed. Therefore, this data collection aligns with the goals of Executive Order (EO) 13985 (Advancing Racial Equity and Support for Underserved Communities Through the Federal Government). Additionally, collecting demographic data in LIHEAP will bring the program into alignment with other programs across OCS including the Community Services Block Grant (CSBG), which currently collects demographic data on beneficiaries, and the Low Income Household Water Assistance Program (LIHWAP), which will collect demographic data on beneficiaries in FY 2023.

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

The results of the information collection are published in the Department's annual LIHEAP Report to Congress. State-level data are prepared as tables in Part III of the LIHEAP Report to Congress. The aggregation of State-level data also is reported in Part III of the LIHEAP Report to Congress. Complex analytical techniques will not be used as national totals, percentages, and percent distributions will be tabulated only. Selected results of the information collection also are published as part of the Department’s annual Congressional Justification.

The LIHEAP Household Report needs to be available before the end of each fiscal year to allow grantees time to submit their completed reports as part of their application for LIHEAP funds for the following fiscal year in accordance with 45 CFR 96.10. This regulation establishes September 1st as the deadline for State, Tribal, and Insular Area



grantees to submit their block grant applications/plans for the following fiscal year. The projected time schedule for the annual LIHEAP Household Report is shown below.

Activity	Weeks following October 1 <sup>st</sup> Submission Deadline
<i>LIHEAP Household Reports</i> (household data can be estimated so as not to delay issuance of new grant awards) reviewed for completeness as part of the LIHEAP grant application process	2
Final (non-estimated) household data inputted and edited	15
Final household data checked and edited for consistency with benefit data from the LIHEAP Performance Data Form – Module I (Grantee Survey), previous fiscal year LIHEAP Household Reports, the LIHEAP Carryover and Reallotment reports, and LIHEAP state plans.	25
Draft of statistical tables for inclusion in annual LIHEAP Report to Congress – text and appendices	34
Final statistical tables for inclusion in annual LIHEAP Report to Congress	40
Publication of annual LIHEAP Report to Congress**	--

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

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

The expiration date for OMB approval of the information collection will be displayed on the report forms and instructions.

**18. Exceptions to Certification for Paperwork Reduction Act Submissions**

There are no exceptions indicated to the certifications required by 5 CFR 1320.9.