

**2024-2025 Low Income Home Energy
Assistance Program (LIHEAP) Residential
Energy Consumption Survey (RECS)
Data Match**

**OMB Information Collection Request
0970 - 0486**

**Supporting Statement Part A -
Justification**

April 2026

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.

The LIHEAP statute requires the program to collect data on beneficiary and eligible households, to report to Congress on program impacts annually, to develop performance goals, to ensure that benefits are targeted to those households with the greatest home energy need, and to assure that timely resources are available to households experiencing home energy crises. These specific statutory requirements are as follows:

- Section 2605(b)(5) of the Low Income Home Energy Assistance Act of 1981 (42 U.S.C. §8624(b)(5)), which requires LIHEAP grant recipients to furnish the highest level of energy assistance to households that have the lowest incomes and the highest energy costs or needs in relation to income;
- Section 2604(c) of the Low Income Home Energy Assistance Act of 1981 (42 U.S.C. §8623(c)), which requires LIHEAP grant recipients to (1) reserve a reasonable amount of LIHEAP funds for energy crisis intervention; and (2) address such crises within 18 or 48 hours, depending upon the severity of the crisis;
- Section 2610(a) of the Low Income Home Energy Assistance Act of 1981 (42 U.S.C. §8629(a)), which requires HHS to collect specific information on the characteristics of LIHEAP beneficiary and LIHEAP eligible households within each state. This includes collecting information that is reasonably necessary to carry out the provisions of the LIHEAP statute if that information is not collected by any other agency of the federal government; and
- Section 2610(b)(2) of the Low Income Home Energy Assistance Act of 1981 (42 U.S.C. §8629(b)(2)), which requires HHS to annually report to Congress on the impact LIHEAP is making on beneficiary and income-eligible households.
- Section 2604(a)(4) of the Low Income Home Energy Assistance Act of 1981 (42 U.S.C. §8623(a)(4)), which requires HHS to update the LIHEAP funding formula regarding the expenditure for home energy by low income households.

The collection of this data is authorized by 42 U.S.C. §8629(a) of the LIHEAP statute, which requires the Secretary of HHS, following consultation with the Secretary of Energy, to provide for the collection of specific information on the characteristics of LIHEAP beneficiary and LIHEAP eligible households within each state. This includes collecting information that is reasonably necessary to carry out the provisions of the LIHEAP statute if that information is not collected by any other agency of the federal government.

OCS uses a number of existing data sources to develop information on households that are income-eligible for LIHEAP. These include the following:

- The Department of Energy's Residential Energy Consumption Survey (RECS) (OMB Control Number 1905-0092), which provides the most accurate information available

- about the demographic, economic, and energy-usage characteristics of U.S. households; and
- State administrative data, which provide the most accurate information about LIHEAP beneficiary households and which flow into the LIHEAP Household Report (OMB Control No. 0970-0060).

Neither the RECS nor the state administrative data alone provides information about the demographic, economic, and energy-usage characteristics of LIHEAP beneficiary households. (RECS' self-reported information on receipt of energy assistance is too unreliable for this purpose.) The only data that provides such information is that from the RECS respondents which the state administrative data demonstrates received LIHEAP benefits.

The purpose of this Supporting Statement is to request to reinstate, with changes, the LIHEAP RECS Data Match to allow OCS to collect administrative household data for use in identifying LIHEAP beneficiaries that respond to the upcoming 2024-2025 RECS. The Department of Energy is planning to conduct the next iteration in 2024 and early 2025. The proposed data collection mirrors the previously approved version with updates to remove eight data elements from the prior data collection in FY 2021 that are no longer needed: household name, household telephone number, date of heating assistance, date of cooling assistance, date of crisis assistance, other assistance awarded, amount of other assistance, and date of other assistance.

2. Purpose and Use of the Information Collection

OCS seeks to collect state administrative data to identify the households in the RECS that are known to have received LIHEAP benefits. It plans to use the data to generate a dataset that shows, of LIHEAP beneficiary households: (1) the demographic, economic, and energy-usage characteristics presented by the RECS; and (2) information, from the state administrative data, on program participation, program benefits, poverty status, vulnerability status, demographic characteristics, ownership or rentership, type of fuel used, and heat-in-rent.

OCS plans to use the resultant dataset in various analyses that characterize LIHEAP beneficiary households and that compare beneficiaries to income-eligible non-beneficiaries. Such datasets will allow OCS to study the impact of LIHEAP on income-eligible and beneficiary households in accordance with section 2610(b)(2) of the LIHEAP Act. Such studies will enter into the following publications and analyses, as they have in the past:

- The Department's annual *LIHEAP Report to Congress* and *LIHEAP Home Energy Notebook*; and
- Estimates about fuel usage, expenditures, energy burden, and LIHEAP targeting among LIHEAP beneficiary households.
- Additional research and analysis of LIHEAP program impacts.

3. Use of Improved Information Technology and Burden Reduction

OCS has reduced the burden of this data collection by 33 percent compared to 2021 by streamlining the instructions to respondents and removing eight data elements. Additionally, all LIHEAP grant recipients already compile the required data to meet HHS' annual Household Report (HHR) reporting and non-duplication-of-benefit requirements. Accordingly, OCS plans to maximize rapid file transfer technology by using a secure internet site that employs File Transfer Protocol.

State LIHEAP grant recipients are familiar with the requested data elements and maintain administrative records that contain such elements to (1) manage their programs; (2) complete their HHRs; and (3) complete their annual LIHEAP Performance Data Forms (OMB Control No. 0970-0449).

OCS expects such grant recipients to use their information technology systems to reduce the burden of providing such data.

4. Efforts to Identify Duplication and Use of Similar Information

The data that OCS is requesting is not available from any source other than LIHEAP grant recipients (and their subrecipients), who collect this information for normal program management, federal reporting requirements, and administrative purposes.

RECS collects utility consumption and expenditure data for a nationally representative sample of households. OCS investigation has revealed no viable alternative to the RECS to furnish robust information on the home energy needs of LIHEAP beneficiary households, and to compare how the needs of LIHEAP beneficiaries compare those of income-eligible non-beneficiary households.

OCS examined other potential options to identify LIHEAP beneficiaries in the RECS data. RECS does collect information on household income and self-reports on whether respondents participated in energy assistance programs. But these self-reports can refer to either LIHEAP or unrelated ratepayer-funded programs. Since the number of households that participate in ratepayer-funded programs is substantial and the benefits granted under such programs are quite different from LIHEAP, relying on self-reported data would furnish poor quality data information to address important LIHEAP performance measurement issues.

5. Impact on Small Businesses or Other Small Entities

There are potentially two different sources of information for the proposed data collection – state LIHEAP grant recipients and LIHEAP subrecipients (i.e., local agencies). In many states, small community-based organizations serve as LIHEAP subrecipients. In the normal course of service delivery, LIHEAP subrecipients already are expected to collect information from applicant households and to report those data to the State LIHEAP grant recipients through automated information systems.

This data collection effort focuses on LIHEAP state grant recipients, rather than on smaller community-based subrecipients. This approach avoids placing a burden on small subrecipients and allows for more efficient data collection that impacts a smaller number of respondents. State LIHEAP grant recipients already collect and utilize this data to complete annual reporting requirements for their state LIHEAP program, and they work regularly with OCS and its contractors.

6. Consequences of Collecting the Information Less Frequently

OCS seeks approval to collect this information only once under this request, i.e., to collect the data one time in summer in 2026.

If this information is not collected, HHS will not be able to update the LIHEAP funding formula and will be less able to study the impact of LIHEAP on income-eligible and beneficiary households in accordance with section 2610(b)(2) of the LIHEAP Act. It will also be wholly unable to estimate fuel usage, expenditures, energy burden, and LIHEAP targeting among LIHEAP beneficiary households. HHS has conducted the LIHEAP RECS Data Match for several RECS iterations in order to report this data in the annual LIHEAP Report to Congress and LIHEAP Home Energy Notebook.

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 February 13, 2026 (91 FR 6847) and provided a sixty-day period for public comment. During the notice and comment period, ACF received 1 comment in response to this notice.

| Summary of Communication Received | Summary of ACF Response |
|--|---|
| <p>Received feedback, suggestions, and questions from the current Mississippi state LIHEAP grant recipient indicating concurrence with the proposed IC and emphasizing need for one-on-one assistance with fulfilling the IC request. *See full text in the uploaded public comment document</p> | <p>ACF acknowledged the comment. OCS concurs. and confirms that one-on-one assistance will be provided proactively to each state LIHEAP grant recipient regarding how to transfer the requested data.</p> |

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 assures the strict privacy of all LIHEAP data and will protect the information to the extent allowed by federal law. The use of this data is governed by the assurances under which the data were collected from respondents and subrecipients. All LIHEAP clients sign authorizations in their LIHEAP applications that allow HHS and its contractors to use data for aggregated statistical purposes.

11. Justification for Sensitive Questions

No sensitive questions are asked in this data collection.

12. Estimates of Annualized Burden Hours and Costs

Estimated Burden Hours

There are 51 expected respondents (state governments and the District of Columbia). The table below summarizes the estimated burden hours and costs for this data collection. These burden estimates are based on a small survey of fewer than 10 state grant recipients that was conducted after the prior collection of data.

Estimated Costs to Respondents

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) job code for Management Analysts (13-1111.00), and wage data from May 2024, which is \$48.65 per hour. To account for fringe benefits and overhead the rate was multiplied by two which is \$97.30. <https://www.bls.gov/oes/tables.htm>

| Information Collection Title | Number of Respondents | Number of Responses Per Respondent | Average Burden Hours Per Response | Total/Annual Burden Hours | Average Hourly Wage | Annual Cost |
|------------------------------|-----------------------|------------------------------------|-----------------------------------|---------------------------|---------------------|-------------|
| 2024 LIHEAP RECS Data Match | 51 | 1 | 16 | 816 | \$97.30 | \$79,397 |

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

There are no other costs to respondents and record keepers. The data collection procedures utilize existing systems and should not require any new capital expenditures by grant recipients.

14. Annualized Cost to the Federal Government

Federal government staff and contractor tasks associated with the collection of these data include:

- Grant Recipient Notification & Monitoring – Notifying grant recipients of the data collection and monitor progress of the data collection effort. Wage rate based on the wage rate of a GS-12, Step 5, in Washington, D.C., using the [OPM Salary Table for 2025](#);

- Data Collection – Collecting the data from grant recipients. Wage rate based on a GS-14, Step 5, in Washington, D.C.; and
- Data Review and Analysis – Reviewing submitted data, working with grant recipients to verify the submitted data, and conducting analysis of the data to prepare administrative data variables and append them to the RECS data file. Wage rate based on a GS-13, Step 5, in Washington, D.C.;

The table below furnishes information on the estimated federal staff hours and costs associated with each task, including 100% for benefits, fringe and management oversight, based on experience with the prior LIHEAP RECS data matches. The non-labor costs from the [supporting statement of ICR 202005-0970-008](#) inflated by 3% per year for four years:

Annual Federal Staff Hours and Costs

| Task | Number of Hours | Rate | Total Annual Cost |
|---|------------------------|-------------|--------------------------|
| Grant Recipient Notification & Monitoring | 2 | \$110.14 | \$220 |
| Data collection | 13 | \$154.76 | \$2,012 |
| Data Review and Analysis | 33 | \$130.96 | \$4,322 |
| Non-Labor Costs (Phone, Fax, And Copying) | | | \$43 |
| Grand Total: | | | \$6,597 |

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 Annual Cost |
|--------------------------|------------------------|---------------------|--------------------------|
| Data Collection | 233 | \$96.85 | \$22,566 |
| Data Review and Analysis | 321 | \$96.85 | \$31,089 |
| Grand Total: | | | \$53,655 |

Total estimated costs to the federal government are **\$60,252.**

15. Explanation for Program Changes or Adjustments

The previous ICR approval was discontinued in 2023. This request seeks to reinstate the OMB number, with changes compared to the most recent approval. OCS is proposing changes to collect timely data for FY24 and FY25 (corresponding to the RECS 2024 fielding period) and to remove eight data elements that are no longer needed. The estimated time per response decreased from 24 hours to 16 hours per response/respondent.

16. Plans for Tabulation and Publication and Project Time Schedule

The household-level data collected for this effort will only be used to 1) identify which respondents in the RECS are LIHEAP beneficiaries, and 2) conduct an internal assessment of program impacts.

The LIHEAP beneficiary data will be collected from grant recipients in 2026, following the end of FY24 as grant recipients are already preparing or have prepared the same data for use in completing their annual required reports. EIA will share with ACF RECS respondent administrative data in spring 2026. It is critical that ACF collect the matching administrative data from state LIHEAP grant recipients in FY 2026 to avoid a gap in data should some states not maintain 2024 data into the next fiscal year. The full survey results will not be published until the 2024 RECS data file is complete by EIA. The final RECS public use microdata file is not expected to be released until at least 2027. Based on that publication schedule, the RECS data file with the appended LIHEAP administrative data will first be available for use in 2027.

The aggregate data generated from RECS for the confirmed LIHEAP beneficiary population will be included in the LIHEAP Home Energy Notebook and the LIHEAP Report to Congress to furnish information to Congress on the LIHEAP beneficiary population. The data will also be used to support special studies and analyses of the LIHEAP program.

| Activity* | Estimated Date** |
|--|-------------------------|
| ACF collects administrative data from DOE and state LIHEAP grant recipients | June 2026 |
| ACF conducts the administrative data match to identify the RECS respondent cohort that received LIHEAP assistance in the same year as the survey | August 2026 |
| LIHEAP Home Energy Notebook - Section II: Home Energy Data | June 2027 |
| LIHEAP Home Energy Notebook - Section IV: Federal LIHEAP Targeting Performance | June 2027 |
| LIHEAP Home Energy Notebook - Section V: Special Study of Energy Insecurity of Low-Income and LIHEAP Beneficiary Households*** | June 2027 |
| LIHEAP Home Energy Notebook - Appendix A: Home Energy Estimates | June 2027 |
| LIHEAP Report to Congress - Part II: Home Energy Data | September 2027 |
| Update the LIHEAP funding formula | Summer 2027 |

* The activity depends upon the execution of the government's plan to revise the LIHEAP Report to Congress and the LIHEAP Home Energy Notebook.

** Publication is dependent upon the department's clearance process.

*** This is the preliminary planned Special Study topic.

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.