



June 8, 2026

Submitted via infocollection@acf.hhs.gov

Administration for Children and Families
Mary E. Switzer Building
330 C Street, S.W.
Washington, D.C. 20201

To Whom It May Concern:

Re: Proposed Information Collection Activity; Annual Report on Households Assisted by the Low Income Home Energy Assistance Program (LIHEAP)

This comment is submitted by poverty and social policy researchers at the Center on Poverty and Social Policy at Columbia University. Our center produces rigorous research that examines the effects of poverty on children, families, and communities in the U.S., nationally, by state, and in New York City. We also assess the impact of social policies and programs on economic well-being and opportunity.

A central focus of our work is understanding who is being served by public programs, who is left out, and how eligibility and receipt affect economic well-being. LIHEAP is among the suite of programs we study, and we have documented its poverty-reducing effects across all 50 states.¹

The April 9, 2026 notice by the Administration for Children and Families (OMB #: 0970-0060), proposes to remove reporting requirements related to sex, race, and ethnicity, characterizing these data elements as not required for statutory LIHEAP reporting or performance measurement. We write to express concern that proposed changes to data collection with respect to sex, race, and ethnicity could hinder future program evaluation and efficacy.

The collection of sex, race, and ethnicity data, having been phased in between Fiscal Years (FY) 2023 and 2024, represents an important enhancement to the LIHEAP program's capacity to understand who is being served and to assess program efficacy. LIHEAP currently reaches an estimated 5 to 6 million households annually, yet without demographic data we cannot identify the answers to basic questions about whether the program is equitably reaching populations in need. Research indicates that Black and Hispanic households experience higher rates of utility

¹ Wilson, D., S. Collyer, M. Curran, & C. Wimer. 2025. [The role of tax credits and transfers in reducing state-level poverty: A 50-state analysis](#). Poverty and Social Policy Report. New York City: Center on Poverty and Social, Columbia University.



hardship, including higher rates of utility disconnection, making it essential to understand whether LIHEAP is reaching those in need in these communities.² Our own research in New York City, through the New York City Poverty Tracker, reveals that when families cannot afford their energy bills, they may reduce spending or forgo basic necessities in other areas – including food and child care – to meet energy expenses or miss their payments entirely and eventually incur a shutoff.³

The LIHEAP statute requires grantees to "conduct outreach activities designed to assure that eligible households, especially households with elderly individuals or disabled individuals, or both, and households with high home energy burdens, are made aware of the assistance available"⁴ under the program. Fulfilling this mandate requires knowing whether these populations are actually being reached. Data on the race, ethnicity, and sex of assisted households can help grantees and OCS understand and evaluate whether outreach efforts are effectively serving the vulnerable populations Congress identified as priorities.

We, as researchers who study the impact of public programs on family outcomes, would also draw on this data in order to better understand the reach and impact of the program. To this end, we note that sex, race, and ethnicity data collected in FY 2023-2025 are not yet publicly available on the LIHEAP Data Warehouse.

For these reasons, we submit this comment to express our concern as poverty and social policy researchers over the proposed removal of LIHEAP data collection efforts.

Sincerely,

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² Lawson, A.J. & C. Mills. 2023. [Electric Utility Disconnections](#). CRS Report R47417. Washington DC: Congressional Research Service.

³ Wilkinson, N., D. Hernández, D. Salgado, S. Collyer, & C. Wimer. 2024. [The Prevalence and Persistence of Energy Insecurity in NYC](#). New York: Robin Hood and Center on Poverty and Social Policy.

⁴ Low Income Home Energy Assistance Act of 1981, 42 U.S.C. § 8624(b)(3)