

**COMMENTS OF THE  
NATIONAL ENERGY ASSISTANCE DIRECTORS' ASSOCIATION  
RE: PROPOSED INFORMATION COLLECTION ACTIVITY,  
78 FEDERAL REGISTER 34105**

**August 2, 2013**

Administration for Children and Families  
Office of Administration  
Office of Information Services  
370 L'Enfant Promenade SW.  
Washington, DC 20447  
[infocollection@acf.hhs.gov](mailto:infocollection@acf.hhs.gov).  
Attn: ACF Reports Clearance Officer.

Contact: Mark Wolfe, NEADA,  
[mwolfe@neada.org](mailto:mwolfe@neada.org), 202-237-5199

The National Energy Assistance Directors' Association (NEADA) represents the state directors of the Low Income Home Energy Assistance Program (LIHEAP). On behalf of the state program directors we welcome the opportunity to respond to the June 6, 2013 Notice published in the Federal Register for comments re an "Annual Collection of Three Performance Measures for the Low Income Home Energy Assistance Program (LIHEAP) and Transition of Collection Instrument for Annual Report on Households Assisted and LIHEAP Grantee Survey."

As stated in the notice, the Administration for Children and Families seeks to collect information that will assist in determining the:

- Average reduction in energy burden for households receiving LIHEAP fuel assistance;
- Percent of unduplicated households where LIHEAP prevented a potential home energy crisis;
- Percent of unduplicated households where LIHEAP benefits restored home energy.

State LIHEAP directors have been actively involved in working with ACF to develop proposed regulations and we applaud the hard work and considerable effort that has been invested in this effort by ACF staff and consultants and state LIHEAP directors in this effort.

After reviewing the proposed regulations, we would like to point out several concerns regarding the implementation of the proposed rules as well as options for addressing those concerns:

First, we believe that the implementation date should be moved to October 1, 2015 in order to provide states with sufficient time to consider strategies to collect useful information. Because of the diversity of programs and data collection systems, we believe that it will be difficult to comply with the requirements in the time period proposed.

Second, we are proposing that ACF consider pilot testing different models to better understand the burden relating to collecting data from delivered fuels vendors as well as secondary sources for those using electricity for cooling. While we understand that the data will provide additional information about the characteristics of households receiving LIHEAP assistance, it is possible that the collection burden could be reduced through targeted surveys or similar approaches.

- In the case of delivered fuel vendors, we believe that the added collection costs will be burdensome and possibly result in some vendors leaving the program. For example, some customers switch vendors by price, sometimes three or four times a season. As such it might be difficult, if not impossible, to track payment and collection data for some households.
- In the case of electric utilities, where the primary fuel source is from a different vendor, some utilities might require an additional release form to provide the data, possibly delaying the processing of that households application.

We are also recommending that the ACF consider two alternative options for collecting the requested data including (1) an expansion of the Residential Energy Conservation Survey (RECS) to ask additional questions of utilities and delivered fuel vendors and (2) a state-based survey that would be conducted on a periodic basis, similar to RECS. We believe that the additional information collected by the RECs survey or an alternative state-based survey would address the concerns raised by ACF and meet the objectives contained in the Notice.

State agencies sign up close to six million households annually for energy assistance. The process has to be done efficiently and quickly in order provide assistance prior to the winter heating season. Meeting the objectives of the three performance measures is important to the state grantees. We believe, however, that the requirements should be implemented cautiously, and allow the states and ACF to gain a better understanding of the additional resources required to collect the required data. The proposed recommendations included in these comments are intended to help clarify the data collection process in order to meet our mutual goals of serving low-income families. We welcome the opportunity to provide further comment on the collection of data in order to meet program performance objectives.