

# NEADA

National Energy Assistance Directors' Association

September 7, 2017

Office of Management and Budget, Paperwork Reduction Project  
Attn: Desk Officer for the Administration for Children and Families.

Re: Application Requirements for the Low Income Home Energy Assistance Program (LIHEAP) Plan Document # 2017-17681

On behalf of the National Energy Assistance Directors Association (NEADA), representing the state directors of the Low Income Home Energy Assistance Program (LIHEAP), I am writing to urge you to approve as soon as possible the LIHEAP Model Plan form so that states may submit their fiscal year 2018 (FY 2018) LIHEAP plans in advance of the start of the fiscal year. This is especially urgent for those states that will be dealing with the aftermath of Hurricane Harvey or Irma and would be able to deploy a portion of their LIHEAP allocation to help families make emergency repairs to their heating and cooling systems and other emergency energy needs.

Each state LIHEAP office is required to submit for approval by the U.S. Department of Health and Human Services, Administration for Children and Families (ACF) a LIHEAP application in the form of a LIHEAP plan in order to receive the following year's appropriation. The plans are usually due on September 1 of each year so that ACF has time to approve the plans before the start of the fiscal year. The lack of a program appropriation prior to the beginning of the fiscal year creates significant administrative problems for states in setting their program eligibility guidelines and hiring staff to process applications. NEADA is deeply concerned that additional delays in approving the form will prevent state LIHEAP offices from receiving FY 2018 funds in time to start their programs in advance of the coming winter.

We request that the Office of Management and Budget (OMB) approve the LIHEAP Model Plan form as soon as the comment period closes on September 21, 2017. There should be no reason for delay since the renewal includes no changes to the previous version. In addition, ACF published a Notice in the Federal Register on April 3, 2017 requesting comments on the form and has addressed the comments submitted.

The average cost of home heating has remained unaffordable for millions of low-income households, with an average annual price of \$782. LIHEAP assistance is only sufficient to reach about one of five eligible households and 70 percent of recipient households have at least one vulnerable and at-risk member who is elderly, disabled or have a child under the age of six.

LIHEAP's impact in many cases goes beyond providing bill payment assistance by playing a crucial role in maintaining family stability. It enables elderly citizens to live independently and ensures that young children have safe, warm homes to live in. Although the circumstances that lead each client to seek LIHEAP assistance vary, LIHEAP enables people to cope with difficult circumstances with dignity.

I appreciate your consideration of NEADA's request to approve the LIHEAP Model Plan form. Our states are ready to deploy these funds to help some of the nation's poorest families pay their home energy bills.

Sincerely,



JOHN M. HARVANKO  
Chair