



August 31, 2017

Desk Officer for the Administration for Children and Families
Office of Management and Budget
Paperwork Reduction Project
OIRA_Submission@OMB.EOP.GOV

Re: Re: Application Requirements for the Low Income Home Energy Assistance Program (LIHEAP) Plan, OMB No.:0970-0075

Dear Desk Officer for the Administration for Children and Families,

Per the August 22, 2017 Comment Request published in the Federal Register¹, we are writing to ask that the LIHEAP Model Plan as presented by the Administration for Children and Families be approved expeditiously. The nonprofit National Consumer Law Center® (NCLC®) works for economic justice for low-income and other disadvantaged people in the U.S. through policy analysis and advocacy, publications, litigation, and training.

LIHEAP is a critical safety-net program that has helped millions of vulnerable low-income households with heating assistance in the frigid winters and cooling assistance in the sweltering summers. More than 70 percent of LIHEAP recipient households have at least one member who is elderly, disabled or is very young – conditions that increase health risks to extreme cold or heat.

The prompt approval of the LIHEAP Model Plan facilitates efficient program administration. States, tribes and territories must electronically submit their LIHEAP state plans to the Administration for Children and Families (ACF), Office of Community Services (OCS) every year before they can receive their LIHEAP grants. In order to reduce the reporting burden on the states and territories, all the data entries from the prior year's state plan are saved and used to pre-populate the following fiscal year's application.

We appreciate your consideration of these comments.

Respectfully submitted,

Olivia Wein, Staff Attorney
National Consumer Law Center,
on behalf of its low-income clients

¹ 82 Fed. Reg. 39790 (Aug. 22, 2017).