



March 11, 2022

Lauren Christopher
Director, Division of Energy Assistance
Office of Community Services
Administration of Children and Families
U.S. Department of Health and Human Services
330 C. Street, S.W.
Washington, D.C. 20201

Transmitted via email: infocollection@acf.hhs.gov

Re: Low Income Home Energy Assistance Program Quarterly Performance and Management Reporting

Dear Lauren Christopher,

I am writing on behalf of the Port Gamble S'Klallam Tribe (PGST or Tribe), a federally recognized, self-governing tribe in response to your February 16, 2022, Dear Colleague Letter and Federal Register Notice, initiating public comment on new proposed data collection and reporting requirements for the Low Income Home Energy Assistance Program (LIHEAP).

In the spirit of consultation, we offer the following comments for the record:

The Port Gamble S'Klallam Tribe is comprised of approximately 1,300 enrolled members, located on the northern end of the Kitsap Peninsula in western Washington. We are coastal Salish people and are a signatory of the Point No Point Treaty of 1855. The mission of the Tribe is to exercise sovereignty and ensure self-determination and self-sufficiency through visionary leadership. We ensure the health, welfare and economic success of a vibrant community through education, economic development, preservation and protection of the rich culture, traditions, language, homelands and natural resources of our Tribe.

The Port Gamble S'Klallam Tribes is one of the first fifteen Self Governance Tribes, fully exercising control over our resources and leading our people into the next century. Our Tribe greatly values and cherishes our community. Our Tribe's Family Assistance program assists families in obtaining needed services, including assisting families access LIHEAP resources.

The proposed reporting is not required under 42 U.S.C. § 8621.

42 U.S.C. § 8624 gives the Secretary broad authority to collect data under LIHEAP.¹ However, that authority does not extend so far as "to require the Secretary to collect data which has been

¹ 42 U.S.C. § 8629(a).

collected and made available to the Secretary by any other agency.”² Various LIHEAP information is already being reported by the Tribe in three separate reports: the annual financial report, the household data report form, and the annual carryover report. It is unduly burdensome and unnecessary to require this additional report when the information is already being provided in numerous other required LIHEAP reports.

We strongly suggest that the U.S. Department of Health and Human Services work with tribes individually to determine how to effectively compile information already submitted in other reports. Specifically, we request amending the already existing, required reports to include information on the performance measures rather than adding an additional report with a quarterly requirement to include this data.

On behalf of the Port Gamble S’Klallam Tribe, thank you for accepting these comments on the proposed reporting requirements for LIHEAP. We appreciate your consideration of tribal perspectives. It is critical that the U.S. Department of Health and Human Services, Administration for Children and Families, Office of Community Services, and Division of Energy Assistance continue to engage with tribal communities on this matter. If you have any questions or require further information about these comments, please do not hesitate to contact our Tribe.

Sincerely,



Jeromy Sullivan
Tribal Chairman
Port Gamble S’Klallam Tribe

² *Id.*