

October 10, 2018

Administration for Children and Families
Office of Planning, Research and Evaluation
330 C Street SW
Washington, DC 20201

To Whom It May Concern:

The State of Minnesota Energy Assistance Program is providing the following comment regarding the LIHEAP Carryover and Reallotment Report FRN1 Clearance (OMB No.: 0970-0106):

According to the "Supporting Statement" provided by HHS for the most recent OMB re-authorization, the LIHEAP Carryover and Reallotment Report (REPORT) is used "to determine the amount of funds to be reallotted." Reallotment is a process of redistributing funds returned to HHS when a grantee (e.g., a State) exceeds the 10 percent carryover limit for a year (i.e., when any funds over 10 percent of the total amount payable to a grantee for a fiscal year are not obligated by the end of that fiscal year).

The REPORT is due by August 1 of each year. Since the federal fiscal year does not end until after September 30, the report is, by necessity, merely an estimate of the total funds that will be obligated by the end of the fiscal year.

The approved instructions that accompany the REPORT provide that any changes to the estimated amount must be corrected and a revised report submitted as soon as possible. Since variance between the estimated and final obligations are all but inevitable in most cases (because estimated obligations are very unlikely to remain the same after two months), revisions to the REPORT are likely to be needed each year. Additionally, HHS staff have provided verbal guidance to grantees indicating that revisions to the REPORT should be made for each change in obligation, regardless of amount. Since actual obligations are likely to change frequently as the end of the fiscal year approaches and expenditures are finalized, such a requirement would be unnecessarily onerous and contradict the annual burden estimates associated with this data collection.

To clarify expectations and reduce the burden of multiple REPORT revisions, Minnesota believes that a final REPORT should be required of all grantees on a specified date, no sooner than December 15th of each year. This requirement would allow time for final obligations to be adjusted (either upward or

downward) as actual expenditures are finalized without the burden of requiring potentially multiple revisions to the REPORT. It would also ensure that HHS staff have reliable, timely, and accurate information on which to base reallocation amounts.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Harvanko", is written over the word "Sincerely,".

John Harvanko
Energy Assistance Program Director
Minnesota Department of Commerce