

Office of Management and Budget #: 0970– 0060.

U.S. Department of Health and Human Services
Administration for Children and Families
Office of Community Services
Submitted to: infocollection@acf.hhs.gov

June 8, 2026

Re: Comments from the Center on Budget and Policy Priorities on the Proposed Information Collection Activity; Annual Report on Households Assisted by the Low Income Home Energy Assistance Program (LIHEAP)

The Center on Budget and Policy Priorities (CBPP), a nonpartisan research and policy institute, appreciates the opportunity to provide comments to the Office of Community Services (OCS) regarding LIHEAP data collection.

We write to express concern about the proposal in the *Federal Register* notice of April 9, 2026 to “[r]emove [LIHEAP’s] reporting requirements related to sex, race, and ethnicity.” Public comments objecting to this action have been submitted by the National Energy Assistance Directors Association, representing state LIHEAP directors, and by the Leadership Conference on Civil and Human Rights on behalf of themselves and numerous other organizations. Both sets of comments note the value that racial, ethnic, and gender data have for properly administering LIHEAP and ensuring that its important benefits reach those most in need in the manner intended by policymakers. CBPP shares those concerns and underscores two points in particular.

First, our own recent analysis of Census Bureau data underscores that energy cost burdens are not evenly distributed across demographic groups. Our analysis finds that 31 percent of Black households, 31 percent of American Indian and Alaska Native (AIAN), and 27 percent of Hispanic households have high energy burdens (energy costs above 6 percent), compared to 24 percent of white households that do so. AIAN households also face the highest frequency of severe energy burden, with 1 in 5 households spending more than 10 percent of their income on energy bills.¹ The findings underscore how difficult, if not impossible, it would be to ensure that LIHEAP is being administered to help households with the highest need without the

¹ Rachel Jacobson and Mikaela Tajo, “States Should Support an Energy System That Is Affordable, Safe, and Reliable for All,” Center on Budget and Policy Priorities, January 20, 2026, [States Should Support an Energy System That Is Affordable, Safe, and Reliable for All | Center on Budget and Policy Priorities](#).

demographic program data that reveal whether it is reaching communities in approximate proportion to their level of need.

Second, we would add that commenting on this proposal substantively is difficult because the Department's *Federal Register* notice fails to explain the Department's reasoning for singling out items related to gender, race, and ethnicity. The notice says only that these items "are not required for statutory LIHEAP reporting or performance measurement." But many items in annual LIHEAP reports, and many others relating to programs the Department administers, are not literally required by the relevant statutes or listed as mandatory performance measures. The Department nonetheless appropriately requires additional information to improve program management. If, for example, a state were to report that some counties had virtually no program participants despite apparently having many eligible people, the Department might reasonably seek to investigate the adequacy of program administration in those counties. In the same way, if a state were to report that members of one or another racial or ethnic group were not participating in LIHEAP despite indications that many such people were eligible, the Department might reasonably investigate whether the state was complying with Title VI of the Civil Rights Act of 1964.

As the Department's only stated reason for removing the reporting requirement makes little sense and is not consistent with the ways the Department administers numerous other programs, we are left to guess what might be the concern. We can wonder, for example, if the Department has concerns about the quality of the data it is receiving for these elements from the states. If so, we would respectfully submit that a better course of action would be to take steps to support states in improving the quality of this data. We also would respectfully submit that even suboptimal data can still serve important purposes in alerting the Department to possible problems requiring further investigation or highlighting potentially problematic trends even if the Department is not entirely confident in the absolute numbers shown.

Sincerely yours,

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