A. **Justification for IMLS Grant Application and Post-Award Reporting Forms**

1. In the previous clearance request of 11/21/2003 the Institute of Museum and Library Services (IMLS) requested Office of Management and budget (OMB) generic clearance for information collections associated with the bulk of IMLS applications and grant administration. On 1/13/2004 OMB approved this request without change. On 11/29/2006 IMLS requested extension of this clearance to 4/30/2007 to improve consistency of language across its grant program guidelines before this submission. That request was also approved. **At this time IMLS requests a three-year generic clearance for all forms used in all grant applications and post-award reporting,** This consolidates all IMLS grants and awards forms under one clearance to reduce future effort and increase efficiency for both IMLS and OMB.

    The information collections included in this package include all of the forms, guidelines, and instructions necessary to make application and complete post-award reports for discretionary grant programs and to fulfill the award requirements of formula funds to State Library Administrative Agencies.

    In FY 2007 IMLS posted application packages for all of its discretionary grant programs on Grants.Gov. Anticipating the use of Grants.Gov and cognizant of the need to extend OMB clearance for them, all of the forms used by IMLS for applications, post-award reporting and the Grants to State Library Administrative Agencies were reviewed, consolidated, and confirmed through an iterative process involving staff and managers. Particular attention was paid to standard government-wide forms (like the SF 424S used in all discretionary applications) and forms cleared by other agencies that are available for use on Grants.Gov. As a result, a core set of five forms is used in the discretionary grant applications, and a set of three forms is used in post-award reporting. The annual reporting process for the Grants to States formula award recipients has been updated and automated to increase consistency and efficiency. Please see the clearance request submitted in parallel with this request for additional contextual detail.

2. The application and reporting information collections are used by applicants for all IMLS grants and awards, including formula-based and discretionary programs. The information is used by peer reviewers to judge the ranking of requests for funding. It is used by IMLS staff to validate eligibility, identify and assign reviewers, manage competitions, make discretionary and formula-based awards, and administer and monitor its grants. It is also used in IMLS performance planning, PAR and other reporting, and to provide information to the Administration and to Congress. Data elements subject to FOIA also provide information about IMLS' grant applications and programs to parties outside the agency, its applicants and grantees, and may be used by applicants to validate their project ideas or application strategies, and to follow trends in their fields.

3. In the FY 2007 discretionary grant cycle, applicants to each IMLS program could

submit online through Grants.Gov. Grants.Gov submission of applications was required in three programs, and optional in the others. In FY 2008, IMLS will require use of Grants.Gov for applications in all but two grant programs, and all programs will require Grants.Gov submission in FY 2009. IMLS will provide PDF-fillable forms for applications in the two programs that permit paper submission in FY 2008.

In the Grants to State Library Administrative Agencies program, the Five-Year Plan, Five-Year Evaluation Report, and annual Financial Status report may be submitted by e-mail. The State Program Report, to which each state reports annually, is entirely online.

4. In FY 2007 IMLS posted application packages for all of its discretionary grant programs on Grants.Gov. Anticipating the use of Grants.Gov and cognizant of the need to extend OMB Clearance for them, all of the forms used by IMLS for applications, post-award reporting and the Grants to State Library Administrative Agencies were reviewed, consolidated, and confirmed through an iterative process involving staff and managers. Particular attention was paid to standard government-wide forms and forms cleared by other agencies that are available for use on Grants.Gov. IMLS uses SF424S in all of its discretionary grant applications, plus Grants.Gov forms for Abstracts and Attachments. We could not find other forms provided the information we determined is needed for our application process. As a result, a core set of five forms is used in the discretionary grant applications, and a set of three forms is used in post-award reporting. The annual reporting process for the Grants to States formula award recipients has been updated and automated to increase consistency and efficiency.

5. While IMLS does not make grants to small businesses, some museums, libraries and related organizations that apply to IMLS are small entities. In developing the forms and instructions, the agency identified the essential forms needed and paid particular attention to consistency and accuracy in the instructions. Efforts were made to use forms that work in multiple programs, rather than being program-specific as they were before. The same is true of the reporting forms, of which there are three used in most of the programs.

6. The information collected in the forms is essential to IMLS's responsibility to expend appropriations, monitor the progress of completion of awards, and enable IMLS to meet its PAR reporting requirements. The information collected from applicants and grant recipients is subject to annual variations and must be collected anew for each grant cycle. In many cases the collection is a one-time collection.

7. None of the listed conditions apply, with the exception of number three, requiring respondents to submit more than an original and two copies of any document. In prior clearances, OMB has allowed IMLS to request one original and ten copies for grant applications accepted in paper to accommodate the peer review process.

With the advent of electronic application, applicants submit one application electronically via Grants.Gov, placing the burden of duplication on the agency. All applications will be submitted via Grants.Gov in FY 2009.

8. The 60-day notice for this collection was published in the Federal Register Vol. 71, no. 213 (November 3, 2006), page 64746. No public comments were received.

    A second 30-day notice requesting comment for this generic clearance was published in the Federal Register: Vol. 72, no. 79 (Wed., April 25, 2007) page 20566.

    IMLS is requesting generic clearance for 15 forms:
    a. six used in the discretionary grant applications
    b. four used in post-award reporting in discretionary programs
    c. three in the State Program Report
    d. two for people who want to become peer reviewers
    e. one for nominations to the National Award for Library Service/National Award for Museum Service.

    Every program of the IMLS assembles panels of experts during each review cycle to review applications submitted to the program for funding. The panelists are consulted by IMLS staff regarding the clarity and value of the guidelines under which they have judged the application. The panel also comments informally on the burden of response required by applicants. IMLS notes and evaluates suggestions for revising guidelines received from applicants responding to the invitation for comments found in the burden statement contained in each information collection. Agency staff consults informally with its communities throughout the year, including regular meetings with the Chiefs of State Library Agencies, semiannual information meetings hosted for represents of key professional associations, and IMLS convenings for other purposes. Efforts are continually made to shorten and simplify application instructions and forms in response to suggestions made by respondents.

    The public also has the opportunity to comment on guidelines at special presentations by staff of IMLS at the annual meetings of IMLS customers such as the American Association of Museums, the American Library Association, the American Association of State and Local history, and other national and regional assemblies.

9. None.

10. IMLS requests permission of an applicant before making any portion of a submitted application publicly available. Other files are subject to FOIA request and are handled on a case-by-case basis. IMLS intends to make final grant reports available via its Web site and will so inform grantees.

11. Not applicable.

12. [Burden hour supplement for the forms. Barbara is working on them.]

13. See response to 12, above. The cost estimate is based solely on the cost of the respondent's time to complete the information collection. No other costs are applicable. Total capitol/start-up and operation/maintenance/purchase of services are not applicable.

14. Not applicable.

15. Not applicable.

16. Not applicable. IMLS may use some of the data collected in the forms to report simple demographic statistics for its grant programs individually or in combination, but statistical analysis will be limited to sums, means and medians. IMLS intends to make final reports of grant achievements available in their original formats via its Web site in electronic form or by link to the grantee's Web site.

17. Not applicable. The expiration date will be displayed.

18. Not applicable.