

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

1. In the previous clearance request 4/30/2007 the Institute of Museum and Library Services (IMLS) provided consistency of language across its grant program guidelines before this submission. That request was approved. **At this time IMLS requests a three-year renewal for generic clearance for all forms used in all grant applications and post-award reporting.**

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, to fulfill the award requirements of formula funds to State Library Administrative Agencies, and to submit nominations for the National Medals for Museum and Library Service.

In FY 2010 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, in addition to several government wide forms (including SF 424S and SF 425) a core set of five IMLS forms is used in the discretionary grant applications, and a set of three IMLS 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 2010 discretionary grant cycle, applicants to each IMLS grant program submitted online through Grants.Gov.

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.

National Medal nominations are submitted through the regular mail.

4. In FY 2010 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 IMLS forms is used in the discretionary grant applications, and a set of three IMLS forms is used in post-award reporting, along with the SF-425. 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 grant applications were submitted via Grants.Gov in FY 2010.

8. The 60-day notice for this collection was published in the Federal Register Vol. 75, no. 82 (April 29, 2010), pages 22631-22632. No public comments were received.

A second 30-day notice requesting comment for this generic clearance was published in the Federal Register: Vol. 75, no. 131 (Friday, July 9, 2010) pages 39582-39583.

IMLS is requesting generic clearance for 15 forms:

- a. five 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 Medal for Museum and Library Service.

Every grant 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. Grant 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. The number of respondents is 4,641, the number of applications and reporting

forms for IMLS grants in FY 2009, the most recent year for which data is available. The number of annual burden hours is 20,048, based on estimates of the average number of hours an applicant will need to review instructions, search existing data sources, gather and maintain the data needed, and complete and review the collection of information. Burden hours per application range from .17 hours to 40 hours, depending on the complexity of the grant project.

This number includes the Discretionary grants and Grants to States program, and the nominations for National Medals.

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 capital/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.