

A. Justification: Generic Clearance for Grant Application Notice of Funding Opportunities for the Institute of Museum and Library Services, OMB Control Number 3137-0029

1. Necessity of the Information Collection

The Institute of Museum and Library Services (IMLS) requests extension of the generic clearance for all the agency’s information collection requests (excluding surveys, evaluations, and data calls used for policy-making purposes) for its grant program processes under the Paperwork Reduction Act. The information collections in this package include all the Notices of Funding Opportunities and instructions necessary to apply for IMLS support as part of the agency’s grant programs. In a separate complementary clearance submission and justification submitted at the same time, IMLS is requesting a three-year extension of its existing generic clearance for all forms used in its grant programs, including application materials, grant reviewer forms, and post-award reports.

Background: On 7/24/2012, IMLS requested, and the Office of Management and Budget (OMB) approved, a reinstatement with change of a previously approved collection until 9/30/2015. OMB approved this request, with modification, on 9/20/2012. IMLS now requests a full OMB clearance of the information collections the Institute requires to carry out its grant programs. IMLS requests that this current general clearance be extended for three years.

The generic clearance now in effect includes the following grant programs’ Notices of Funding Opportunities, forms, and the processes associated with them:

Program	OMB Clearance No.	Expiration date
NLG		
National Leadership Grants for Libraries ¹	3137-0029	09/30/2015
National Leadership Grants for Museums ²	3137-0029	09/30/2015
Conservation Assessment Program ³	3137-0029	09/30/2015
Museum Assessment Program ⁴	3137-0029	09/30/2015
National Medal for Museum and Library Service	3137-0029	09/30/2015
Laura Bush 21 st -Century Librarian Program	3137-0029	09/30/2015
Museums for America	3137-0029	09/30/2015
Museum Grants for African American History and Culture	3137-0029	09/30/2015
Native American/Native Hawaiian Museum Services	3137-0029	09/30/2015
Native American Library Services Basic	3137-0029	09/30/2015
Native American Library Services Enhancement	3137-0029	09/30/2015
Native Hawaiian Library Services	3137-0029	09/30/2015

As new grant initiatives are established within the period of the renewed clearance, IMLS expects to use the submitted application Notices of Funding Opportunities content and application forms, and the current, ongoing, internal review process for programs and Notices of Funding Opportunities. The agency continually makes minor adjustments to programs and priorities to address emerging needs and other changes in the environment.

¹ Sparks! Ignition Grants for Libraries is included under the National Leadership Grants for Libraries

² Sparks! Ignition Grants for Museums is included under the National Leadership Grants for Museums

³ Conservation Assessment Program (CAP) has been a joint project of the Institute of Museum and Library Services (IMLS) and Heritage Preservation since its inception in 1990. Primary funding for this program has come from IMLS, with program implementation managed by Heritage Preservation.

⁴ Museum Assessment Program (MAP) is supported through a cooperative agreement between the Institute of Museum and Library Services and the American Alliance of Museums.

Application Notices of Funding Opportunities: IMLS uses an iterative review process for each set of Notices of Funding Opportunities in every fiscal year. The process is defined in IMLS's *Grants Administration Manual* and it is designed to ensure that key stakeholders and agency officials review and authorize proposed Notices of Funding Opportunities. In FY 2007, text common to all of IMLS grant program applications was rewritten to provide consistent information and language across all these program documents. Beginning in FY2013, IMLS complied with the Plain Writing Act of 2010 to provide "clear government communication that the public can understand and use." We at the Institute of Museum and Library Services are committed to writing new documents in plain language, using the [Federal Plain Language Guidelines](#).

2. Purposes and Uses of the Data

The information collected by IMLS is used by the agency to carry out its grant programs. The information is used by IMLS staff to validate applicant eligibility, identify and assign peer reviewers, manage grant competitions, award discretionary and formula-based grants, and administer and monitor its grants. It is also used by the agency for strategic planning, performance analysis, and to provide information to the Administration and to Congress. Data elements subject to FOIA also provide information about IMLS's grant applications and programs to individuals outside the agency, and may be used by applicants to validate their project ideas or application strategies, to follow trends in their fields, and to identify effective practice that can be widely adapted to improve the quality of museum and library services in the United States. IMLS intends to make final grant reports available via its website and so informs grantees.

3. Use of Information Technology

IMLS is committed to the use of improved information technology to improve the efficiency and effectiveness of its programs, while reducing burden on potential applicants. Applicants can download all Notices of Funding Opportunities, and application instructions online. In addition, the Five Year State Plan Guidelines for State Library Administrative Agencies is made available online. IMLS requires all applicants to apply for IMLS awards online through Grants.gov.

4. Efforts to Identify Duplication

All IMLS grant application Notices of Funding Opportunities and publications are annually reviewed through an internal clearance process, which requires review by several different offices within the agency, including the program offices, the Office of General Counsel, and the Grants Administration Office. This annual review process protects against duplication.

5. Method Used to Minimize Burden on Small Businesses

Participation is entirely voluntary. No small businesses are impacted, but some applicants for IMLS funding are small non-profit organizations. Every effort has been made to streamline processes and instructions and to simplify the application and reporting processes. The agency's internal clearance process ensures that no undue burden is placed on any applicant for IMLS funding.

6. Consequences of Less Frequent Data Collection

These collections of information are essential to IMLS in meeting its statutory mission to award Federal financial assistance under the Museum and Library Act (20 U.S.C. Section 9101 *et seq.*), and its obligation to identify needs and trends in museum, library and information services. The information collections included in this package vary in frequency. Many are one time per application, others are annual, and one is every five years.

7. Special Circumstances

None of the listed conditions applies.

8. Consultations Outside the Agency

The 60-day notice for this collection was published in the Federal Register Vol. 80, no. 25 (February 6, 2015), pages 27486. One public comment was received. A 30-day notice requesting comment for this generic clearance was published in the Federal Register: Vol. 80, No. 99 (May 22, 2015), pages 29752.

IMLS uses several different mechanisms to consult with persons outside the agency. Contact information for program officers is widely distributed and easily accessible from the IMLS website, and grantees and potential applicants are encouraged to communicate frequently with these experts. In addition, program officers convene nationwide conference calls to answer questions and take input. IMLS program staff also travel to national, regional, and local meetings of potential applicants to discuss program requirements. Finally, agency staff consults informally with its communities throughout the year, including regular meetings with the Chiefs of State Library Administrative Agencies, semiannual information meetings hosted for representatives of key professional associations, and IMLS convenings for other purposes.

During the grant application review process, outside experts are asked to review applications and discuss the agency's forms, instructions, and process. These experts are consulted by IMLS staff regarding the clarity and value of the Notices of Funding Opportunities and informally comment on the burden of response required by applicants.

IMLS notes and evaluates suggestions for revising Notices of Funding Opportunities and reporting forms received from applicants responding to the invitation for comments found in the burden statement contained in each information collection. Efforts are continually made to shorten and simplify application instructions and forms in response to suggestions made by respondents.

9. Payments or Gifts to Respondents

No payments or gifts are provided to any of the respondents.

10. Assurance of Confidentiality

No assurance of confidentiality is provided. 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 website and so informs grantees.

11. Justification for Sensitive Questions

There are no questions of a sensitive nature.

12. Estimate of Hour Burden to Respondents

The estimated number of respondents is 1,721. This number was estimated based on an assessment of the number of applicants for IMLS grants in FY 2014, the most recent year for which data is available. The number of annual burden hours is estimated to be 45,222.78, 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 narrative components of the application. Burden hours per response range from 2 hours to 90 hours (for the Five-Year Plan for

Grants to State Library Administrative Agencies), depending on the complexity of an applicant's grant project.

Note: burden hours for completing forms associated with applications are accounted for in the ICR for generic clearance for applications and reporting forms.

Fifty-six of the respondents and 5,040 of the burden hours represent the Five-Year Plan for Grants to State Library Administrative Agencies, required by law from each SLAA at five-year intervals and due in this clearance period.

13. Estimate of Cost Burden to Respondents

The estimated cost to applicants is \$1,251,314.32. The cost per hour is based on \$27.67, the Bureau of Labor Statistics mean hourly wage of a museum or library professional. The estimated burden hour cost per application ranges from \$55.34 (2 hours x \$27.67) for the simplest application to \$1,106.80 (40 hours x \$27.67) for a complex, large-scale project. IMLS discretionary grants range in size from \$5,000 to \$2,000,000; burden correlates well with grant size.

The total estimated cost to State Library Administrative Agencies for the Five-Year Plan is \$139,456.80, which is incurred once every five years. The estimated cost to each SLAA is \$2,490.30 (90 hours x \$27.67). Grants to the 50 states, the District of Columbia, the Commonwealth of Puerto Rico, Guam, American Samoa, the U.S. Virgin Islands, the Commonwealth of the Northern Mariana Islands, the Republic of the Marshall Islands, the Federated States of Micronesia, and the Republic of Palau have ranged from \$80,642 to \$15,030,377; burden is positively correlated with grant size. FY2014 figures were used.

Note: the cost for completion of forms associated with applications is accounted for in the ICR for generic clearance for applications and reporting forms.

The two cost components for total capital/start-up and operation/maintenance/purchase of services are not applicable.

14. Estimate of Costs to Federal Government

The annualized cost to IMLS is estimated at \$73,913. Currently the agency has calculated that 1,473 responses are made each year. Approximately 1,798 hours are spent by IMLS staff reviewing and processing each response at an average wage of \$41.12. The annualized cost to IMLS for the Five-Year Plan for Grants to State Library Administrative Agencies is estimated at \$6,908. The agency receives 56 responses at five-year intervals. Approximately 168 hours are spent by IMLS staff reviewing and processing each response at an average wage of \$41.12.

15. Explanation of Change in Burden

The IMLS burden may change slightly from year to year as new needs are identified and priorities shift in response to appropriations and to changes in the museum and library environments. Programs may be added, enlarged, reduced, or discontinued. Applications in this period exceeded expectations, allowing IMLS to reach more institutions and communities with federal funding.

The burden estimates submitted here total 45,222.78 hours and \$1,251,314.32. This burden estimate includes a recalculated average hourly wage for IMLS respondents, from \$27.41 to 27.67.

16. Statistical Usage

Not applicable.

17. Request to Not Display Expiration Date

Not applicable. The expiration date will be displayed.

18. Exception to Certification Statement

Not applicable.