

A. Justification: Generic Clearance for IMLS Grant Forms: Interim and Final Performance Reports and Cover Sheets

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 includes the Interim and Final Performance reports and cover sheets. IMLS is requesting a new three-year clearance separating from an existing generic clearance (3137-0071) from the other forms and instructions necessary to apply for IMLS support as part of the agency's grant programs.

Background: On 06/1/2015, IMLS requested, and the Office of Management and Budget (OMB) approved, a reinstatement with change of a previously approved collection for the Generic Clearance for IMLS Grant Forms (3137-0071) through 7/31/2018. IMLS has submitted non-substantive changes, relevant to changing priorities and potential applicant input, which were subsequently approved by OMB. Within the previous approvals there were multiple forms included in one package. IMLS is working toward parsing out the documentation for like collections in order to implement a new process for renewal and updates on like forms rather than a bulk submission of all forms. At this time IMLS would like a new OMB clearance number issued for the Interim and Final Performance reports and cover sheets maintaining the same expiration date of 7/31/2018 as the Generic Clearance for IMLS Grant Forms. Once the separation requests are completed, the groupings with new numbers will be as listed below:

- Program Information Sheet, Budget Form, Digital forms (3137-0092)
- Native American Basic Budget A&B and Native American Basic Final Financial and Performance Report
- Interim and Final Performance Reports and cover sheets
- Library Reviewer form and Museum Reviewer form

2. Purposes and Uses of the Data

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's 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. 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 application forms and instructions online. IMLS requires all applicants to

apply for IMLS awards online through Grants.gov. Performance and financial reports for discretionary grant programs can be submitted via e-mail or regular mail. In the Grants to State Library Administrative Agencies program, each of the required forms can be accessed online, and the State Program Report, to which each state reports annually, is entirely online.

4. Efforts to Identify Duplication

All IMLS grant application materials, including reporting forms, 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.

Particular attention has been paid to standard government-wide forms and forms cleared by other agencies that are available for use on Grants.Gov. IMLS uses SF-424S in all its discretionary grant applications, plus Grants.Gov forms for abstracts and attachments. The annual reporting process for the Grants to States formula award recipients has been updated and automated to increase consistency and efficiency.

5. Method Used to Minimize Burden on Small Businesses

Participation is entirely voluntary. 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 discretionary grant programs.

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 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. Special Circumstances

None of the listed conditions applies.

8. Consultations Outside the Agency

The 60-day notice for the IMLS Grant Program Application and Post-Award Report Forms (3137-0071) 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 general clearance was published in the Federal Register: Vol. 80 No. 99 (May 22, 2015), pages 29752.

Each IMLS grant program 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 Notices of Funding Opportunities 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 Notices of Funding Opportunities 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 representatives 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 Notices of Funding Opportunities at special presentations by staff of IMLS at the annual meetings of IMLS stakeholders such as the American Alliance of Museums, the American Library Association, the American Association for State and Local History, and other national and regional assemblies.

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 number of respondents is 976, the number of Interim and Final Performance reports and cover sheets for IMLS grants in FY 2015, the most recent year for which data is available. The number of annual burden hours is 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 response is 15.39 hours. Total burden hours is 6,234.27.

These numbers include the discretionary grants, Grants to States program, and the nominations for the National Medal for Museum and Library Services.

13. Estimate of Cost Burden to Respondents

See response to No. 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.

The estimated cost to respondents is \$174,185.50. The cost per hour is based on \$27.94, the Bureau of Labor Statistics mean hourly wage of a museum or library professional.

14. Estimate of Costs to Federal Government

The annualized cost to IMLS is estimated at \$47,267.44. Currently the agency has calculated that 976 responses are made each year. Approximately 1149.5 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.

16. Statistical Usage

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.

17. Request to Not Display Expiration Date

Not applicable. The expiration date will be displayed.

18. Exception to Certification Statement

Not applicable.