

## **A. Justification: Notice of Funding Opportunity: Native American Enhancement and Native American Basic Library, OMB Control Number 3137-XXXX**

### **1. Necessity of the Information Collection**

The Institute of Museum and Library Services (IMLS) requests a new clearance for the Native American Enhancement Library Grant Program to separate it from the Native American Basic Library grant program, under the Paperwork Reduction Act. The information collection in this package include the Notices of Funding Opportunities and instructions necessary to apply for IMLS support as part of the agency's grant programs.

**Background:** IMLS is working toward parsing out the documentation for like programs in order to implement a better process for renewal and updates on like Notice of Funding Opportunities (NOFO) rather than a bulk submission of all NOFOs. At this time IMLS would like a new OMB clearance number issued for Native American Enhancement Library Grant Program, maintaining the same expiration date of 7/31/2018, as the General Clearance Grant Application and Post-Award Processes general clearance. This would separate the Native American Enhancement Library Grant Program from the Native American Basic Library Program. Although both grant programs are directed at the Native American Library population, they are very different programs in scope and timeline. Having them within the same number has caused submission problems in ROCIS where one often blocks the other until approved. The Native American Basic Library Grant Program will maintain the 3137-0093 OMB approval number.

**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. This standardization and refinement has continued with each successive NOFO. 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 the Native American Enhancement Library Notice of Funding Opportunity, and application instructions 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 Grant Policy and Management 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 have two separate deadlines in a grant year.

#### **7. Special Circumstances**

None of the listed conditions applies.

#### **8. Consultations Outside the Agency**

The 60-day notice for the General Clearance Grant Application and Post-Award Processes (3137-0029) and IMLS Grant Program Application and Post-Award Report Forms (3137-0071) general clearance collections was published in the Federal Register Vol. 80, no. 25 February 6, 2015), pages 6771-6772. One public comment was received. A 30-day notice requesting comment for the generic clearances was published in the Federal Register: Vol. 80, No. 99 (May 22, 2015), pages 29752.

The new Federal Register Notice will be prepared for the funding opportunities in FY19 since this will expire in July 2018.

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 35. This number was estimated based on an assessment of the number of applicants for IMLS grants in FY 2017, the most recent year for which data is available. The number of annual burden hours is estimated to be 1400 hours (40 hours x 35 applicants), 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.

#### **13. Estimate of Cost Burden to Respondents**

The estimated cost to applicants is \$39,662. The average cost per hour is based on \$28.33, the Bureau of Labor Statistics average mean hourly wage of a librarians. The estimated burden hour cost per application is 40 hours for Native American Enhancement (40 hours x \$28.33=\$1133.20).

Note: the cost for completion of forms associated with applications is accounted for in the ICR for clearance for the general grant program application and post-award report form clearance.

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 \$2878.40. The agency has received 35 total applications. Approximately 2 hours (1-3.5/hour average time to process one complete application) are spent by IMLS staff reviewing and processing each response at an average wage of \$41.12.

#### **15. Explanation of Change in Burden**

There is no change in burden for this Native American Enhancement Library program. The burden for currently existing number 3137-0093 will be less because it will only reflect the Native American Basic Library Program

#### **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.