

## **A. Justification: Generic Clearance for IMLS Grant Forms (ref 3137-0071)**

### **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 all forms used in its grant programs, including application materials, grant reviewer forms, and post-award reports. 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 the Notices of Funding Opportunities and instructions necessary to apply for IMLS support as part of the agency's grant programs.

The information collections included in this package include all the forms, and instructions used in IMLS's grant programs, including application materials, grant reviewer forms, and post-award reports.

**Background:** On 07/25/2012, IMLS requested, and the Office of Management and Budget (OMB) approved, a revision of a currently approved collection until 09/30/2015. OMB approved this request on 09/20/2012. IMLS now requests a full three-year extension of its existing OMB clearance of the information collections the Institute requires to carry out its grant programs.

### **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.

National Medal nominations can also be submitted through regular mail or e-mail.

### **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 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 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 6,327, the number of applications and reporting forms for IMLS grants in FY 2014, the most recent year for which data is available. The number of annual burden hours is 14,889.30, 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 range from 0.17 hours to 40 hours, depending on the complexity of the grant project.

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

**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 \$411,986.93. The cost per hour is based on \$27.67, the Bureau of Labor Statistics mean hourly wage of a museum or library professional.

Note: the cost for completion of narrative components of grant applications is accounted for in the ICR for generic clearance for grant application Notice of Funding Opportunities (OMB Control Number 3137-0029)

**14. Estimate of Costs to Federal Government**

The annualized cost to IMLS is estimated at \$406,017. Currently the agency has calculated that 7,080 responses are made each year. Approximately 9,874 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.