# A. Justification: Accelerating Promising Practices for Small Libraries NOFO, OMB Control Number 3137-TBD

#### 1. Necessity of the Information Collection

The Institute of Museum and Library Services (IMLS) requests a clearance for the new grant program Accelerating Promising Practices for Small Libraries (APP) Grant Program Notice of Funding Opportunity under the Paperwork Reduction Act. The descriptive instructions are new and do not have a clearance. The forms referred to in the document are IMLS OMB approved forms. The information collections in this package include instructions necessary for organizations to apply for grant funding from IMLS.

# **Background:**

IMLS is requesting the approval of the Notice of Funding Opportunity instructions for this new grant initiative. The goal of the IMLS initiative Accelerating Promising Practices for Small Libraries (APP) is to support projects that strengthen the ability of small and rural libraries and archives to serve their communities. IMLS invites applications that focus on transforming school library practice, community memory, or digital inclusion, and are clearly linked to an individual institution's broader community needs. IMLS Accelerating Promising Practices for Small Libraries (APPL) is being offered as a special initiative with funding from the National Leadership Grants for Libraries Program. This action is to create the instructions for this initiative as a Notice of Funding Opportunity for the next three years.

#### 2. Purposes and Uses of the Data

The information collected by IMLS is used by the agency to carry out its grant and technical assistance 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 reports available via its website and so informs applicants.

#### 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 Notice of Funding Opportunities Forms and instructions online. Detailed information will be available at <a href="https://www.imls.gov/">https://www.imls.gov/</a>.

#### 4. Efforts to Identify Duplication

All IMLS externally facing documents 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 Policy and Management Office. This annual review process protects against duplication. 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.

#### 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 from 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.

#### 7. Special Circumstances

None of the listed conditions apply.

# 8. Consultations Outside the Agency

The 60-day notice for the IMLS Accelerating Promising Practice for Small Libraries (APP) Notice of Funding Opportunity (3137-TBD) was published on August 16, 2018 in the Federal Register 83 FR 40791. A 30-day notice requesting comment for the OMB clearance was published in the Federal Register on October 18, 2018 in the Federal Register 83 FR 52571. No comments were received.

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 convening events for other purposes.

IMLS notes and evaluates all suggestions from applicants, for revising Notices of Funding Opportunities and reporting forms, 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. Files are subject to FOIA requests and are handled on a case-by-case basis. IMLS intends to make final reports available via its website and so informs applicants and 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 150. This number was estimated based on an assessment of the number of applicants for other small programs in previous years, with the various forms. The number of annual burden hours is estimated to be 5250 hours, based on estimates of the average number of 35 hours that an applicant will need to review instructions, search existing data sources, gather and maintain the data needed, and complete and review the components of the forms.

# 13. Estimate of Cost Burden to Respondents

The estimated cost to applicants is \$145,582.50. The average cost per hour is based on \$27.73/hour, the Bureau of Labor Statistics average mean hourly wage of library or museum staff. The estimated cost per application is \$970.55 for the Notice of Funding Opportunities.

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

There are no costs to the federal government.

# 15. Explanation of Change in Burden

There is no change in burden.

#### 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.