A. Justification: Emergency Clearance for IMLS Grant Forms: IMLS Program Information Form and instructions

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 IMLS Program Information Form and instructions. IMLS is requesting an emergency clearance necessary to apply for IMLS support as part of the agency's CARES Act Grants for Museums and Libraries and for Native American/Native Hawaiian Museum and Library Services.

   Background: IMLS created an abbreviated Program Information Form that will be used by all applicants to both new initiatives. Its content is greatly reduced from the current OMB-cleared, Grants.gov form, IMLS Museum Program Information Form (OMB Control #: 3137-0092). Because there is not enough time to create another more generic Grants.gov Program Information Form, we will create a fillable PDF that applicants will download from our website as they do our IMLS Budget Form and our Digital Product 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. The IMLS Program Information Form will be a fillable PDF that applicants will download from our website as they do our IMLS Budget Form and our Digital Product Form. IMLS requires all applicants to apply for IMLS awards online through Grants.gov. Performance and financial reports for discretionary grant programs will be submitted via the electronic grants management system, eGMS Reach.

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 Office of Grants Policy and Management. 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*.; in particular § 9173 (d) (Services for Native Americans)), to identify needs and trends in museum, library, and information services, and to prevent, prepare for, and respond to coronavirus under the Coronavirus Aid, Relief, and Economic Security (CARES) Act (Pub. L. 116-136 [March 27, 2020]). 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**

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 and webinars 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 number of respondents is 360. 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 90 hours.

These numbers include the Notice of Funding Opportunities: CARES Act Grants for Museums and Libraries and for Native American/Native Hawaiian 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 $2,514.60. 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 $4,056.30. Approximately 0.25 hours are spent by IMLS staff reviewing and processing each response at an average wage of $45.07.

15. **Explanation of Change in Burden**

This is a new submission. There are no program changes or cost adjustments.

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.