A. Justification: Notice of Funding Opportunity: Museums Empowered: Professional Development Opportunities for Museum Staff, OMB Control Number 3137-0107

1. **Necessity of the Information Collection**

   The Institute of Museum and Library Services (IMLS) is the primary source of federal support for the nation's 123,000 libraries and 35,000 museums. IMLS' mission is to create strong libraries and museums that connect people to information and ideas. IMLS works at the national level and in coordination with state and local organizations to sustain heritage, culture, and knowledge; enhance learning and innovation; and support professional development.

   The Institute of Museum and Library Services (IMLS) is requesting a renewal for an existing collection in use for the *Museums Empowered: Professional Development Opportunities* for Museum Staff special initiative under the Paperwork Reduction Act. The information collection in this package includes a *Museums Empowered* Notice of Funding Opportunity and instructions necessary to apply for IMLS support as part of the agency's grant programs.

   Museums Empowered: Professional Development Opportunities for Museum Staff is a special initiative of the Museums for America grant program with the goal of strengthening the ability of an individual museum to serve its public through professional development activities that cut across various departments to generate systemic change within the museum.

   Museums need to be dynamic to respond to fast-evolving technological advances and changing demographics. Museums also need to generate and share results to demonstrate their community impact. In addition, they need to develop sustainable organizational structures and flexible strategies for long-term stability. Professional development is critical for museums to deliver on these areas of need.

   IMLS encourages applicants to invest in the professional development of museum staff, leadership, and volunteers to enhance their skills and ensure the highest standards in all aspects of museum operations. Potential projects should involve multiple levels of staff and generate organizational change. There are four priority areas, and potential projects will be structured to focus on one of them: (1) Digital Technology, (2) Diversity and Inclusion, (3) Evaluation, and (4) Organizational Management.

   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. 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.

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 *Museums Empowered* Notice of Funding Opportunity and application instructions online. IMLS requires all applicants to apply for IMLS awards online through Grants.gov. All aspects of grant making, from application ingestion through review, award making, payments, and project monitoring, are accomplished through eGMS, the agency's electronic grants management system.

4. **Efforts to Identify Duplication**

All IMLS grant application Notices of Funding Opportunities and publications are reviewed annually 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.

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**

This collection of information is 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 collection included in this package is annual.

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. 84, no. 220, pages 61942-61943. One comment was received requesting copies of the form(s) and supporting statement. A 30-day notice requesting comment for this generic clearance was published in the Federal Register: Vol. 85, No. 95, pages 29490-29491.

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 through convening grantees at meetings organized by IMLS program staff.

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 100. This number was estimated based on an assessment of the number of applicants for IMLS grants in FY 2019, the most recent year for which data is available. The number of annual burden hours is estimated to be 4,000 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 $112,480. The average cost per hour is based on $28.12, the Bureau of Labor Statistics average mean hourly wage of a museum employee. The estimated burden hour cost per application is 40 hours (40 hours x $28.12).

Note: the cost for completion of forms associated with applications is accounted for in the ICR for generic clearance for applications and reporting forms.

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 $16,738.56 based on an estimated 100 applications and an estimated 18 grant award recipients (18 respondents x 4 forms, Discretionary interim performance report, Discretionary final performance report, financial report, and payment request) for a total of

372 responses in 2019. Approximately 384 hours are spent by IMLS staff reviewing and processing each response at an average wage of $43.59.

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.