

A. Justification: Notice of Funding Opportunity: Collections Assessment for Preservation Program, OMB Control Number 3137-0103

1. Necessity of the Information Collection

The Institute of Museum and Library Services (IMLS) requests a new clearance for the Collections Assessment for Preservation Program (CAP) for its program processes under the Paperwork Reduction Act. The current clearance expires in July 2018. The information collections in this package include instructions necessary to apply for IMLS support as part of the agency's grant and technical assistance programs. The Collections Assessment for Preservation Program (CAP), is supported through a cooperative agreement between the Institute of Museum and Library Services and the Foundation of the American Institute for Conservation of Historic and Artistic Works, Inc. (FAIC).

Background:

The Collections Assessment for Preservation Program (CAP) is designed to support collections assessments for small and medium-sized museums throughout the nation. The collections assessment is a study of all of the institution's collections, buildings and building systems, as well as its policies and procedures relating to collections care. Participants who complete the program receive an assessment report with prioritized recommendations to improve collections care.

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 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 Conservation Assessment Program application instructions online. Detailed information will be available at <http://www.conservation-us.org/> and <https://www.imls.gov/>.

4. Efforts to Identify Duplication

All IMLS 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 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 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 2019-2021 IMLS Collections Assessment for Preservation Program (3137-0103) was published in the Federal Register 82 FR 56275 on November 28, 2017. A 30-day notice requesting comment for the generic clearances was published in the Federal Register 83 FR 11565 on March 15, 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 775. This number was estimated based on an assessment of the number of applicants for the CAP program in previous years, with the various forms. The number of annual burden hours is estimated to be 392, based on estimates of the average number of four 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 forms.

13. Estimate of Cost Burden to Respondents

The estimated cost to applicants is \$10,732. The average cost per hour is based on \$27.40, the Bureau of Labor Statistics average mean hourly wage of a museum curators. The estimated burden hour cost per application is 4 hours for the Conservation Assessment Program (4 hours x \$27.40).

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 the federal government is estimated at \$275,000. This amount is based on the FY 2014 cooperative agreement between the Institute of Museum and Library Services and the Foundation of the American Institute for Conservation of Historic and Artistic Works, Inc. (FAIC).

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.