## A. Justification: Request for Advance or Reimbursement Web Form

## 1. Necessity of the Information Collection

The Institute of Museum and Library Services (IMLS) requests a new clearance number for the Request for Advance or Reimbursement Web Form under the Paperwork Reduction Act. The information collections in this package include instructions necessary for organizations to request an advance or reimbursement payment.

#### Background

Beginning in FY2020, IMLS implemented the Electronic Grants Management System (eGMS) originally developed by the National Endowment for the Humanities and now used also by the National Endowment for the Arts and IMLS. IMLS uses eGMS to monitor and service all active awards during the period of performance and throughout closeout. This action is to request approval for the proposed Request for Advance or Reimbursement Web Form, which will be embedded in eGMS and used by awardees to request advance or reimbursement payments.

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

The information collected by IMLS through this form is used by the agency to process and track payment requests submitted by awardees. eGMS will display the amount of each payment request under the award for financial federal drawdown. A payment report is available on demand in eGMS for IMLS staff to download and view payments by date.

#### 3. Use of Information Technology

IMLS is committed to the use of information technology to improve the efficiency and effectiveness of its operations and programs, while reducing burden on potential applicants and awardees as well as staff. The data in each payment request is entered by the awardee and stored in eGMS for review and approval by IMLS staff, saving many hours for all parties in contrast to completing, submitting, and processing a payment request in paper form.

## 4. Efforts to Identify Duplication

All IMLS externally facing forms and 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 Office of Grants Policy and Management. 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 <u>Federal Plain Language Guidelines</u>. This is particularly relevant for the instructions that will accompany the Request for Advance or Reimbursement Web Form.

## 5. Method Used to Minimize Burden on Small Businesses

No small businesses are impacted, but some IMLS awardees are small non-profit organizations. Every effort has been made to streamline and simplify the payment request process by limiting questions to those truly needed to process a payment request.

## 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 Request for Advance or Reimbursement Web Form was published on October 22, 2021 in the Federal Register 85 FR 67379. A 30-day notice requesting comment for the OMB clearance was published in the Federal Register on January 14, 2021 in the Federal Register 86 FR 3214. No comments were received.

## 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.

## **11. Justification for Sensitive Questions**

There are no questions of a sensitive nature.

## 12. Estimate of Hour Burden to Respondents

The estimated total number of respondents is 5,000, based on estimates of the average number of 60 minutes needed to review instructions, search existing data sources, gather and maintain the data needed, and complete and review the components of the form. This number was estimated based on an assessment of the number of active IMLS awardees in current and previous years. Each awardee will complete the Request for Advance or Reimbursement Web Form in order to receive payment of funds expended for its award.

## 13. Estimate of Cost Burden to Respondents

The total estimated cost to awardees is \$145,500.00 for the Request for Advance or Reimbursement Web Form. The burden hours total 5,000, based on an average of 1 hour each. The average cost per hour is based on \$29.10, the Bureau of Labor Statistics average mean hourly wage for library and museum staff.

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 total cost to the Federal Government is \$43,750.00 for the form.

## 15. Explanation of Change in Burden

No change in burden.

# 16. Statistical Usage

Not applicable.

# **17. Request to Not Display Expiration Date**

Not applicable. The OMB number and expiration date will be displayed.

# **18. Exception to Certification Statement**

Not applicable.