A. Justification: 2022-2024 IMLS Grant Forms, OMB Control Number 3137-0092

1. **Necessity of the Information Collection**

   The Institute of Museum and Library Services (IMLS) requests a renewal clearance for the IMLS Grant Application Forms under the Paperwork Reduction Act. The current clearance expires on August 31, 2021. The information collections in this package include instructions necessary for organizations to apply for grant funding IMLS.

   Background

   To facilitate the administration of the IMLS application and review processes for its discretionary grants and cooperative agreements, IMLS uses standardized application forms for eligible libraries, museums, and other organizations to apply for its funding. The forms submitted for public review in this Notice are the IMLS Library-Discretionary Program Information Form, the IMLS Museum Program Information Form, and the IMLS Supplementary Information Form. The IMLS Budget Form and the Digital Product Form will be submitted for clearance at a later date.

   Beginning in FY2020, IMLS implemented the eGMS (Electronic Grants Management System) originally developed by the National Endowment for the Humanities and now used also by the National Endowment for the Arts and IMLS. The revised IMLS Library-Discretionary Program Information Form, the IMLS Museum Program Information Form, and the IMLS Supplementary Information Form are each included in one or more of the Grants.gov application packages associated with IMLS grant programs, and they automatically transmit data into eGMS through a system-to-system interface.

   This action is to renew the forms and instructions associated with all IMLS Notice of Funding Opportunities for the next three years.

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

   The information collected by IMLS through these forms is used by the agency to identify any high level financial concerns about applicants, identify alignments with agency-level goals and objectives, validate applicant eligibility, identify audience(s) served, assign peer reviewers, and manage the peer review processes. 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. Each of these forms is incorporated into one or more of the Grants.gov application packages associated with IMLS discretionary grant programs and is thus accessed through Grants.gov Workspace. The data entered by applicants is automatically transferred to eGMS, the agency's electronic grants management system through a system-to-system interface, thus saving many hours of data entry time.

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 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 [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 2022-2024 IMLS Grant Application Forms (3137-0092) was published on October 7, 2021 in the Federal Register 85 FR 63299. A 30-day notice requesting comment for the OMB clearance was published in the Federal Register on December 14, 2020 in the Federal Register 85 FR 80823. A comment to the 30-day notice was 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 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 2,928 total for the 3 forms. This number was estimated based on an assessment of the number of applicants for IMLS grant programs in previous years. All applicants complete the Supplementary Form; applicants to museum grant programs complete the IMLS Museum Program Information Form, and applicants to library grant programs complete the IMLS Library-Discretionary Program Information Form. The number of annual burden hours is estimated to be 512 hours, based on estimates of the average number of 12 minutes that an applicant needs 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 $14,913.86 for the 3 forms. The burden hours total 512, and the average is 171 hours. 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 $60,316.80 for the 3 forms.

15. Explanation of Change in Burden

The change in burden is due to salary increases and to the increased number of respondents from 2018 to 2020.

16. Statistical Usage

Not applicable.

17. Request to Not Display Expiration Date

Not applicable. The new expiration date will be displayed.

18. Exception to Certification Statement

Not applicable.