

## **Justification for Change**

3137-0092 Generic Clearance for IMLS Grant Forms: IMLS Program Information Forms (PIF)

IMLS is requesting a change to a clearance currently under OMB review for approval in order to update reflect our new agency-level goals and objectives. The current OMB approval expiration date of 2/29/2021.

## **Request abstract:**

In this clearance submission (3137-0092) and justification, IMLS is requesting a non-substantive change to a previously approved clearance for two Program Information Forms used in applications to IMLS grant programs. The forms are the IMLS Library - Discretionary Program Information Form and the IMLS Museum Program Information Form.

IMLS uses eGMS, the electronic grants management system created by the National Endowment for the Humanities (NEH). In preparation for the transition from a previous system to eGMS, IMLS modified several of its standard application forms to be part of the package that applicants download from Grants.gov. This made it possible for data provided by applicants to be immediately transferred from Grants.gov and ingested into the eGMS system, beginning with the FY20 grant cycle.

In October, 2020, IMLS modified its agency-level goals and objectives in preparation for creating a new strategic plan and to comply with the revisions implemented for 2 C.F.R. part 200. We have updated the forms that will be part of FY2022 applications, and these are currently in OMB review. If approved, they will replace the forms currently in the Grants.gov package that applicants download. In the interim, however, we have four remaining FY2021 grant programs that require a Program Information Form reflecting the new agency-level goals and objectives. In this request, we seek approval to make these changes in two new forms.

- A revised **IMLS Library – Discretionary Program Information Form** will be used for three Native American and Native Hawaiian Library Services grant programs. The revisions include:
  - Section 2: Updated agency-level goals and objectives.
  - Section 3: Eliminated the references to the library grant programs to which this form does not apply, and retained only the three that are relevant.
- A revised **IMLS Museum Program Information Form** will be used for the Collections Assessment for Preservation program. The revisions include:
  - Section 2: Updated agency-level goals and objectives,
  - Section 3: Eliminated the references to the museum grant programs and project categories to which this form does not apply, and retained only the options that are relevant.

## **Burden Estimate:**

The estimated number of respondents is 239 total. The total number of annual burden hours is estimated to be 60 hours (57.5 for the revised IMLS Library -Discretionary Program Information Form and 2.25 for the revised IMLS Museum Program Information Form), based on estimates of

the average number of 0.25 hours for the Program Information Form that an applicant will need to review instructions, search existing data sources, gather and maintain the data needed, and complete and review the components of the form.

The estimated cost burden to respondents is \$1,775.74. The cost per hour is based on \$29.77 for Librarians and \$28.43 for Museum Curators, the Bureau of Labor Statistics average mean hourly wage of library or museum staff.

The total Federal Costs is \$4,923.40 based on 0.5 hours to process the forms at an average salary of \$41.20.