

## **A. Justification: Peer Reviewer Nomination Forms, OMB Control Number 3137-0092**

### **1. Necessity of the Information Collection**

The Institute of Museum and Library Services (IMLS) requests a new clearance for the IMLS Grant Application Forms under the Paperwork Reduction Act. The current clearance expires on July 31, 2018. The information collections in this package include instructions necessary for organizations to apply for grant funding IMLS.

#### **Background:**

To administer the IMLS processes of grants and cooperative agreements, IMLS uses standardized application forms, guidelines and reporting forms for eligible libraries, museums, and other organizations to apply for its funding. These forms submitted for public review in this Notice are the Program Information Sheet, the Budget Form spreadsheet, and the Digital Product Form. This collection of information from these forms are a part of the IMLS grant application process.

Beginning in FY2020, IMLS will implement the eGMS (Electronic Grants Management System) currently developed and utilized by the National Endowment for the Humanities. Two forms which will replace the Program Information Sheet have been included for review. These forms, along with the common SF-424, will form the basis for IMLS grant applications automatically transmitting data into the eGMS system.

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

### **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 reports available via its website and so informs applicants.

### **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 grant forms and instructions online. Detailed information will be available at <https://www.imls.gov/>.

### **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 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 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 2019-2021 IMLS Grant Application Forms (3137-0092) was published on December 4, 2017 in the Federal Register 82 FR 57299. A 30-day notice requesting comment for the OMB clearance was published in the Federal Register on May 17, 2018 in the Federal Register 83 FR 22995. One comment was 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 regular meetings with the Chiefs of State Library Administrative Agencies, 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 1650 per form. This number was estimated based on an assessment of the number of applicants for the IMLS grant programs in previous years, with the various forms. The number of annual burden hours is estimated to be 1681 hours, based on estimates of the average number of 1.08 hours 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 forms.

#### **13. Estimate of Cost Burden to Respondents**

The estimated cost to applicants is \$138,319. The average cost per hour is based on \$25.22, the Bureau of Labor Statistics average mean hourly wage of library or museum staff. The estimated cost per application (3 forms combined) is \$83.82 for each Notice of Funding Opportunities.

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**

There are no costs to the federal government.

#### **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 new expiration date will be displayed.

#### **18. Exception to Certification Statement**

Not applicable.