

**Supporting Statement A. Justification: 2022-2024 IMLS Native American Basic Grant
Performance Report Form
OMB Control Number 3137-0098**

1. Circumstances Making the Collection of Information Necessary

The Institute of Museum and Library Services (IMLS) requests a three-year renewal clearance for the Native American Basic Grant Performance Report Form under the Paperwork Reduction Act. IMLS uses a standardized performance report form for Federally recognized Native American Tribes that receive funding through its non-competitive discretionary grant program. The current clearance expires on March 31, 2022.

2. Purposes and Uses of the Data

The information collected by IMLS through this form constitutes a record of IMLS-funded project activities, results, and accomplishments at annual intervals throughout the grant period and at the conclusion of each award; accountings of best practices and lessons learned; and performance measurements. Although specific goals and objectives vary among projects, using a standardized performance report form helps ensure consistent information collection, which in turn can form the foundation for meaningful inter- and intra-program analyses.

In various forms, IMLS uses the information to monitor individual grants; to describe our grants and our grant-making efforts on the IMLS website; to prepare the Annual Performance Report for OMB; and to support other data reporting requirements for the Administration and Congress. Data elements subject to FOIA also provide information about IMLS's grant awards 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 tribal library services in the United States.

3. Use of Information Technology

IMLS is committed to the use of current information technology to improve the efficiency and effectiveness of its programs and reporting requirements, while reducing the burden on awardees. Beginning in FY2020, IMLS implemented 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. eGMS is recognized as IMLS's system of record for all functions related to grants management, and with this new set of forms, we propose to expand the system's capability to accept performance reports submitted directly online. This replaces the previous system of providing Word documents and instructions on our website, which awardees downloaded, completed, scanned or saved as PDFs, and then uploaded to eGMS. We intend to enable the system to autofill the metadata associated with each award (e.g., the FAIN, the project title, the name of the recipient organization, the award period of performance start and end dates, the agency-level goal, and the grant program goal and objectives), thus lowering the burden on awardees, helping ensure a lower error rate, and contributing to improved data sets overall.

4. Efforts to Identify Duplication

All IMLS externally facing documents are annually reviewed through an internal clearance process, which requires review by different offices within the agency, including the program offices, and the Office of Grants Policy and Management. This annual review process protects against duplication.

5. Method Used to Minimize Burden on Small Businesses

Participation is entirely voluntary. No small businesses are impacted, but some awardees are from small tribes. Every effort has been made to streamline processes and to simplify the reporting process. The

agency's internal clearance process ensures that no undue burden is placed on any applicant for IMLS funding. This form was designed specifically to be a minimal burden on tribes.

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 collected in the forms is essential to IMLS's responsibility to expend appropriations, monitor the progress of completion of awards, and enable IMLS to meet its PAR reporting requirements. The information collected from applicants and grant recipients is subject to annual variations and must be collected anew for each grant cycle. In most cases in this particular grant program, the collection is a one-time collection.

7. Special Circumstances

No special circumstances require the collection to be conducted in a manner inconsistent with the guidelines in 5 C.F.R. § 1320.6.

8. Consultations Outside the Agency

IMLS uses a variety of mechanisms to consult about its grants administration practices with persons outside the agency. Contact information for program officers is widely distributed and easily accessible from the IMLS website, and awardees are encouraged to communicate frequently with these experts. When possible, IMLS program staff travel to meetings attended by potential applicants and awardees and take advantage of opportunities to discuss program requirements, including but not limited to reporting. Finally, agency staff consults informally with its communities through information meetings hosted for representatives of key professional associations as well as convenings of awardees in particular programs.

IMLS notes and evaluates all suggestions from awardees for revising reporting forms and responds to the invitation for comments found in the burden statement contained in each information collection. Efforts are continually made to shorten and simplify forms in response to suggestions made by respondents.

The 60-Day Notice for the 2022-2024 Grant Performance Report Forms (3137-0098) was published on January 8, 2021 in the Federal Register 86 FR 1539. No comments were received. A 30-Day Notice requesting comment for the OMB clearance was published in the Federal Register on January 28, 2022 in the Federal Register 87 FR 4662-4663.

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 request and are handled on a case-by-case basis. IMLS intends to make final grant reports available via its website and so informs awardees.

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 180, based on the number of open grants in any year. The estimated average burden per response is 2.00 hours, with the estimated total annual burden to be 360.00 hours. The Total Annualized capital/startup costs do not apply. The total annual cost is \$11,001.60.

13. Estimate of Cost Burden to Respondents

The estimated cost to awardees is \$11,001.60. The burden hours total 360.00, based on the total time per response of 2.00 hours multiplied by 180 responses. The average cost per hour is based on \$30.56, the Bureau of Labor Statistics average mean hourly wage for library 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 annualized cost to IMLS is estimated at \$7,846.20. The agency expects to receive 180 applications. Approximately one hour is spent by IMLS staff reviewing each report (180 hours total) at an average wage of \$43.59.

15. Explanation of Change in Burden

The change in burden is due to salary increases and the added requirement to report on performance measurements. Overall, the burden estimate also represents time savings that we deem likely to result from the ability of awardees able to submit their reports directly online and the ability of our system to autofill much of the metadata associated with each award.

16. Statistical Usage

Not applicable.

17. Request to Not Display Expiration Date

No exemption from the requirements to display the expiration date for OMB approval of the information collection is being requested for the performance report form. The OMB approval number and expiration date will be displayed.

18. Exception to Certification Statement

There are no exceptions to the certification statement.