

A. Justification: Generic Clearance for IMLS Grant Forms: Native American Basic Final Financial and Performance Report

1. Necessity of the Information Collection

IMLS would like a new three year OMB clearance for the Native American Library Services Basic Final Financial and Performance Report Form, OMB Form #3137-0098.

2. Purposes and Uses of the Data

These forms are used in IMLS performance planning, PAR and other reporting, 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 parties outside the agency, its applicants and grantees, and may be used by applicants to validate their project ideas or application strategies, and to follow trends in their fields. IMLS intends to make final grant reports available via its website and so informs grantees.

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 all application forms and instructions online. IMLS requires all applicants to apply for IMLS awards online through Grants.gov. Performance and financial reports for discretionary grant programs can be submitted via e-mail or regular mail.

4. Efforts to Identify Duplication

All IMLS grant application materials, including reporting forms, 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 Administration Office. This annual review process protects against duplication.

Particular attention has been paid to standard government-wide forms and forms cleared by other agencies that are available for use on Grants.Gov. IMLS uses SF-424S in all its discretionary grant applications, plus Grants.Gov forms for abstracts and attachments.

5. Method Used to Minimize Burden on Small Businesses

Participation is entirely voluntary. While IMLS does not make grants to small businesses, some museums, libraries, and related organizations that apply to IMLS are small entities. In developing the forms and instructions, the agency identified the essential forms needed and paid particular attention to consistency and accuracy in the instructions. 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 many cases the collection is a one-time collection.

7. Special Circumstances

None of the listed conditions applies.

8. Consultations Outside the Agency

In addition to the required Federal Register notices, the public also has the opportunity to comment on all data collections and Notices of Funding Opportunities at special presentations by staff of IMLS at the annual meetings of IMLS stakeholders such as the American Alliance of Museums, the American Library Association, the American Association for State and Local History, ATALM, and other national and regional assemblies.

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. Grant 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 grantees.

11. Justification for Sensitive Questions

There are no questions of a sensitive nature.

12. Estimate of Hour Burden to Respondents

The number of respondents is 220, the number of Native American Basic Final Financial and Performance Report for IMLS grants in FY 2018, the most recent year for which data is available. The number of annual burden hours is based on estimates of the average number of hours an applicant will need to review instructions, search existing data sources, gather and maintain the data needed, and complete and review the collection of information. Burden hours per response is 2 hours.

13. Estimate of Cost Burden to Respondents

See response to No. 12, above. The cost estimate is based solely on the cost of the respondent's time to complete the information collection. No other costs are applicable. Total capital/start-up and operation/maintenance/purchase of services are not applicable.

The estimated cost to respondents is \$12,262.80. The cost per hour is based on \$27.87, the Bureau of Labor Statistics mean hourly wage of a library professional.

14. Estimate of Costs to Federal Government

There are no extra costs to the federal government other than regular grant administration functions.

15. Explanation of Change in Burden

The IMLS burden may change slightly from year to year as new needs are identified and priorities shift in response to appropriations and to changes in the museum and library environments. Programs may be added, enlarged, reduced, or discontinued.

16. Statistical Usage

Not applicable. IMLS may use some of the data collected in the forms to report simple demographic statistics for its grant programs individually or in combination, but statistical analysis will be limited to sums, means, and medians.

17. Request to Not Display Expiration Date

Not applicable. The expiration date will be displayed.

18. Exception to Certification Statement

Not applicable.