

## IMLS Interim and Final Grant Performance Forms

### Supporting Statement for PRA Submission

**A**

#### **Justification**

##### **A.1. Circumstances Making the Collection of Information Necessary**

###### **A.1.a. Purpose of the Submission**

IMLS is requesting a new three year approval of its Interim and Final Performance Reporting Forms and instructions, OMB #3137-0100. The forms have been updated to reflect the new IMLS strategic plan and the relevant federal reporting requirements.

###### **A.1.b. Legislative Authorization**

IMLS is the primary source of federal support for the nation's libraries and museums. We advance, support, and empower America's museums, libraries, and related organizations through grant making, research, and policy development. Our vision is a nation where museums and libraries work together to transform the lives of individuals and communities. To learn more, visit [www.ims.gov](http://www.ims.gov).

IMLS is responsible for identifying national needs for and trends in museum, library, and information services. IMLS must also measure and report on the impact and effectiveness of museum, library, and information services throughout the United States, including the impact of programs conducted with funds made available by IMLS. IMLS must identify the best practices of such programs and disseminate the results of its policy research, analysis, and data collection. This data collection is authorized by 20 U.S.C. § 9108 (Policy research, analysis, data collection, and dissemination).

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

Data will be collected from all IMLS grantees and used for both grant compliance and performance reporting. In various forms, the information is used to prepare the PAR for OMB, grant information on the IMLS website, and other publically available data reporting including to the Administration and Congress. Data elements subject to FOIA also provide information about IMLS grants to parties outside the agency, other applicants and grantees. The grant

information may be used by applicants to validate their project ideas or application strategies, and to follow trends in their fields.

### **A.3. Use of Improved Information Technology**

IMLS is committed to the use of improved information technology to improve the efficiency and effectiveness of its programs and reporting requirements, while reducing the burden on applicants. Applicants can download the forms and instructions on line through the IMLS website. The forms are fillable Word documents and are submitted electronically through email to a central collection point.

### **A.4. Efforts to Identify Duplication**

All IMLS grant application materials, including reporting forms, are annually reviewed through an internal clearance, which requires review by several different offices within the agency. These include the program offices, the Office of General Counsel, and the Office of Grant Policy and Management. There is no duplication as each award is only required to complete the forms once.

### **A.5. Method Used to Minimize Burden on Small Businesses**

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. Efforts were made to use forms that work in multiple programs, rather than being program specific as in the past. There will be no impact on small businesses or other small entities.

### **A.6. Frequency of Data Collection**

One year awards are only required to complete the final Performance Reporting Form. Multi-year award must complete the interim report on an annual basis.

### **A.7. Special Circumstances of Data Collection**

No special circumstances require the collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.6.

**A.8. Consultation and Feedback from Outside the Agency**

Public comments are solicited through *Federal Register* notices at the 60 day and 30 day periods. No comments were submitted.

**A.9. Provision of Payments or Gifts to Respondents**

There are no payments or gifts to respondents.

**A.10. Assurance of Confidentiality**

The information collected on the IMLS Performance Forms is not confidential and this is noted in the instructions.

**A.11. Sensitive Questions**

There are no sensitive questions in the information collection.

**A.12. Estimated Response Burden**

The estimated number of respondents is 976, based on the number of open grants in any year. The estimated average burden per response is 15.4 hours, with the estimated total annual Burden to be 6235 hours. The Total Annualized capital/startup costs do not apply. The total annual cost is \$174,186.

**A.13. Estimates of Cost**

Equipment, software or services: This survey does not require respondents to purchase equipment, software, or services beyond those normally used as part of customary and usual business.

Record keeping or reporting costs: There are no record keeping or reporting costs to the survey respondents.

**A.14. Annualized Cost to the Federal Government**

There are no special costs to the federal government other than the normal operating costs for grant management.

**A.15. Reasons for Changes in Response Burden and Costs**

Not applicable.

**A.16. Publication Plans and Time Schedule**

Not applicable.

**A.17. Approval for Not Displaying the Expiration Date for OMB Approval**

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

**A.18. Exceptions to the Certification Statement**

No exceptions to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," apply.