

Part A. Justification: IMLS Grants to States Program State Reporting System, Including Site Visit Checklist (3137-0071)

1. Necessity of the Information Collection

The Institute of Museum and Library Services (IMLS) requests the incorporation of a Site Visit Checklist as a stand-alone form in the State Program Report (SPR) System for the Grants to States (G2S) Program under the Paperwork Reduction Act (PRA). This information collection supports the agency's work to monitor its largest grant program, which distributes over \$160 million every year to State Library Administrative Agencies (SLAAs) using a population-based formula.

Each SLAA is required, under 20 U.S.C. § 9101 *et seq.* (in particular 20 U.S.C. § 9134), to submit a plan that details library services goals for a five-year period, along with completed certifications. Pursuant to 20 U.S.C. § 9134 (c), each SLAA that receives an IMLS grant under the G2S program is required to evaluate and report on all funded project activities to IMLS, prior to the end of the execution of its five-year plan. Each SLAA receives IMLS funding to support activities for the five-year period through a series of overlapping two-year grant awards. Each SLAA must file interim and final financial reports, and final performance reports for each of these two-year grants through IMLS's State Program Reporting (SPR) system. The performance reports incorporate performance measures to track participants' outcomes based on a combination of the project's activity mode and beneficiary type.

Based on the utility of the SPR system for IMLS and for SLAAs, the agency would like to integrate a Site Visit Checklist there as a stand-alone form. While not a legal requirement of the G2S program, the Site Visit Checklist is an administrative requirement to ensure the program is fulfilling its monitoring and compliance responsibilities for these multi-million-dollar grants. The SPR forms and materials were last approved by OMB on 8/26/2021 and are being submitted with the newly added Site Visit Checklist and with minor updates reflecting the regulatory change from using DUNS to using UEI as entity identifiers.

2. Purposes and Uses of the Data

The SPR gathers information from SLAAs about project inputs, activities, and outputs, and includes narrative fields for describing outcomes. The SPR also collects responses to performance measure questions that report on a limited set of standardized beneficiary outcomes aligned with formula grant requirements. These data are used for IMLS program planning and the Government Performance and Results Act (GPRA)/Annual Performance Report (APR) and other reporting to the Office of Management and Budget (OMB) and Congress. They also enable IMLS and its State partners to better understand the effectiveness of the funded projects, to improve accountability, and to identify promising practices for broader dissemination across the library sector.

Certifications in this package help IMLS ensure SLAA compliance with applicable laws and regulations.

The Site Visit Checklist in this package is a new addition. The G2S program strives to visit with all 59 states and territories during each five-year period and has met this site-visit requirement the last three cycles (i.e., 2008-2012, 2013-2017, 2018-2022), with adaptations implemented for the outlying Pacific territories and during the COVID-19 pandemic. The backbone of these site visits, whether in-person or virtual, is the Site Visit Checklist

instrument, which IMLS uses to collect information about four main areas: general statistical information, legal authority and compliance, administrative activity, and financial activity. IMLS program officers use this checklist as the basis for conversations with SLAAs to ensure that they are meeting the federal requirements and as the basis for technical assistance, including recommendations to strengthen the program. The recommendations are sent to the SLAA following the site visit in the form of a letter, which has been the traditional record-level evidence that a site visit has occurred. The Site Visit Checklist and associated documentation (e.g., grant files, financial tracking data), are viewed as working files to fulfill the agency's oversight activities. The checklist data are occasionally used to support internal inquiries, such as the number of states that consider tribal libraries eligible for IMLS grants. They are neither systematically analyzed nor released to audiences outside IMLS.

3. Use of Information Technology

IMLS is committed to the use of information technology to improve the efficiency and effectiveness of its programs while reducing burden on SLAA grantees. The SPR online reporting system is specifically designed to maximize ease of use, which is why it is considered an improved solution for the Site Visit Checklist.

Prior versions of the Site Visit Checklist took the form of a fillable PDF with expandable response fields, which were not always compatible with local software and presented accessibility challenges. Additionally, accompanying checklist documentation from the SLAAs had to be provided separately to IMLS and saved in the agency system for working files. This subjected the site-visit documentation to a fragmented filing approach. Further, since the checklist is only filled out once every five years, and there is often turnover in the SLAA workforce, new staff frequently scramble to find all the needed information. Using the efficiencies of the SPR system to house the Site Visit Checklist information will address all three issues.

SLAAs already use the SPR on an annual basis to submit their grant reports, and it is compatible with multiple browsers. Moving the Site Visit Checklist there addresses longstanding accessibility issues. The SPR system already integrates form-style answers and uploaded documentation for annual reports, which are then accessible to both IMLS and the SLAAs. This feature solves the filing fragmentation problem associated with the prior approach by making the Site Visit Checklist documentation accessible to both IMLS and SLAAs. Since the Site Visit Checklist would be a stand-alone form in the SPR that the SLAAs update only once every five years, the existing data from the last-submitted checklist would be available to them as they prepare for upcoming site visits, and thus mitigate instances of staff turnover and lost institutional knowledge. This feature will also reduce response burden, in general.

4. Efforts to Identify Duplication

The SPR was designed with explicit consideration of four other major federal statistical collections – (1) the Public Libraries Survey (PLS) annually administered by IMLS, (2) the SLAA Survey biennially administered by IMLS, (3) the Integrated Postsecondary Education Data System (IPEDS) administered by the U.S. Department of Education, and (4) Common Core of Data (CCD) administered by the U.S. Department of Education. The SPR contains identifier fields that map each project to each of these four data collections to facilitate the use of these other federal collections, thereby enhancing the utility of the SPR's unique administrative data set.

IMLS has worked closely with members of Project Outcome, a performance measurement effort of the Public Library Association that is operating in all 50 States and the District of Columbia, to ensure that there is no duplication of effort for public libraries that comprise the largest sub-recipients in the G2S program. The performance outcome measures for the SPR also closely correspond with those required of grantees in IMLS discretionary programs in complying with performance reporting requirements under the Uniform Guidance (2 C.F.R. part 200).

Questions in the newly added Site Visit Checklist are intended to serve an oversight function for the G2S program, assuring IMLS that the SLAA is complying with federal requirements. IMLS already tracks some of this information on an annual basis, such as the return of signed certifications and assurances. However, having a comprehensive snapshot once every five years in the form of a Site Visit Checklist fulfills an auditing purpose that the program inherited when IMLS became an independent agency in 1996. Prior to that, library formula grants were administered through the Department of Education with its own Inspector General. The Site Visit Checklist also gives the SLAA a chance to reflect on its administrative and financial responsibilities once every five years, and to make iterative improvements to strengthen the program. While informal check-ups might occur more frequently, the site visit is a more formal component of the program that often uncovers emerging areas of concern that did not otherwise receive the appropriate attention.

Most of the checklist questions are not duplicative with any other information collected and are intended to tee up deeper conversations around an SLAA's processes. The checklist has been designed with consideration of the Public Libraries Survey (PLS) annually administered by IMLS and the SLAA Survey biennially administered by IMLS. The agency has considered every question in the checklist from the lens of avoiding unnecessary duplication of effort for the responding SLAAs.

5. Method Used to Minimize Burden on Small Businesses

Not applicable.

6. Consequences of Less Frequent Data Collection

These collections of information are essential to IMLS in meeting its statutory mission under 20 U.S.C. § 9101 *et seq.* The annual information collected by the SPR is necessary to support IMLS in prudently expending its appropriations, monitoring the progress of award completion, and meeting its APR reporting requirements. The information collected from grant recipients is subject to annual variations and must be collected anew for each grant cycle.

The information in the Site Visit Checklist is essential to IMLS in meeting its programmatic mission and monitoring its largest grant program. This information collection underscores the importance of SLAA compliance with federal requirements and heads off issues that could expose the program to risk. The information is collected only once every five years to align with the programmatic cycle and ensure that SLAAs are spending federal IMLS funds in accordance with federal requirements. Less frequent data collection would weaken the agency's ability to provide technical assistance and needed oversight.

7. Special Circumstances

Not applicable.

8. Consultations Outside the Agency

The 60-day notice for this collection was published in the Federal Register May 3, 2022 (87 FR 26231). A 30-day notice requesting comment for this clearance was published in the Federal Register on August 3, 2022 (87 FR 47471).

Agency staff, particularly Grants to States program staff, receive informal feedback from SLAAs during the site visit process that contributed to this shift to a new Site Visit Checklist solution. Together with evaluation officers, they also consult informally with the SLAA community throughout the year, including regular meetings with professional staff and the chief executive officers of SLAAs. These include the IMLS-hosted annual conference focused on grants-related training for the states, informal Zoom calls to help state representatives connect with each other, and participation in state-hosted forums. Question-and-answer sessions in these meetings can surface pain points that the SLAAs experience during their administration of the program. IMLS staff consider this feedback as they make incremental user experience enhancements to the SPR reporting system and other changes documented in this package. Based on feedback, the Site Visit Checklist has been designed to move to the SPR system and create reporting efficiencies.

9. Payments or Gifts to Respondents

No payments or gifts are provided to any of the respondents.

10. Assurance of Confidentiality

The identities of survey respondents for the performance outcomes questions are not reported in the SPR. Grantees only provide aggregate data about project beneficiaries. In the event that a project has fewer than five survey participants, this information is not shared on SPR's public portal.

Site Visit Checklist respondents are requested to self-identify as part of the information collection, which aids with internal oversight and the larger site visit process. The SPR system is password protected with assigned roles so that only users from a given SLAA will be able to view their Site Visit Checklist data. IMLS will not otherwise release the Site Visit Checklist information and will keep it confidential and private to the extent allowable by law.

11. Justification for Sensitive Questions

There are no questions of a sensitive nature.

12. Estimate of Hour Burden to Respondents

The affected public for this data collection are the State Library Administrative Agencies (SLAAs), which number 59 respondents. The estimated average burden per overall response to the Site Visit Checklist is 20 hours once every five years, and 47.83 hours annually for the State Program Report. The total estimated annual burden is 2,822 hours.

13. Estimate of Cost Burden to Respondents

The total estimated annual cost burden to respondents is \$87,086.

14. Estimate of Costs to Federal Government

The total estimated annual cost burden to the Federal Government is \$40,377 to review and analyze the SPR data, including both the Site Visit Checklist (1 hour per SLAA every 5 years) and the annual reports (15.5 hours per SLAA every year).

15. Explanation of Change in Burden

The burden for the administration of the SPR is slightly higher than that noted in 2021, reflecting the incorporation of the Site Visit Checklist in the SPR.

16. Statistical Usage

This is a non-statistical administrative collection. However, the data in the SPR are used for analysis and reporting in addition to serving as the administrative reporting portal for the G2S program.

17. Request to Not Display Expiration Date

Not applicable. The expiration date will be displayed.

18. Exception to Certification Statement

Not applicable.