Part A. Justification: 2021-2023 IMLS Grants to States Program "State Reporting System" (3137-0071)

1. **Necessity of the Information Collection**

   The Institute of Museum and Library Services (IMLS) requests an approval of a renewal of the three-year clearance for the agency's information collection requests for the State Reporting System for the Grants to States (G2S) Program under the Paperwork Reduction Act (PRA).

   Each State Library Administrative Agency (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 associated 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 when attribution claims are defensible based on a combination of the project's activity mode and beneficiary type. These forms and materials were approved by OMB on 6/11/2018 and are being submitted with minor updates intended to increase efficiencies and minimize confusion, based on feedback from SLAAs.

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. Based on SLAA feedback and internal review, the Internet Safety form now has two variants (i.e., one for public libraries and one for SLAAs serving as public libraries), and a five-year certification for SLAAs that also addresses Internet Safety was revived.

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.

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).

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 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.

7. **Special Circumstances**

Not applicable.

8. **Consultations Outside the Agency**

The 60-day notice for this collection was published in the Federal Register April 21, 2021 (86 FR 20743). A 30-day notice requesting comment for this clearance was published in the Federal Register on July 7, 2021 (86 FR 35829).

Agency staff, including Grants to States program staff and evaluation officers, consult informally with its communities 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 reporting. IMLS staff consider this feedback as they make incremental user experience enhancements to the reporting system and other changes

documented in this package. Based on feedback, minor changes to the documentation and certifications have been proposed to minimize confusion 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.

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 date collection are the State Library Administrative Agencies (SLAAs), which number 118 respondents (59 x 2 ICs = 118). The estimated average burden per overall response is 47.83 hours. The total estimated total annual burden is 2,822 hours.

13. Estimate of Cost Burden to Respondents

The total estimated annual cost burden to respondents is $86,239.40.

14. Estimate of Costs to Federal Government

The total estimated annual cost burden to the Federal Government is $39,863.06 to review and analyze the performance data.

15. Explanation of Change in Burden

The burden for the administration of the SPR is slightly higher than that noted in 2018, reflecting an increase in average salaries. Costs to the Federal Government have been updated to more accurately reflect the time required for program officers to review report data.

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.