

Justification for Change

Guidelines for IMLS Grants to States Five-Year Evaluation (3137-0090)

IMLS is requesting approval for non-substantive changes in the Guidelines for IMLS Grants to States Five-Year Evaluation to update key calendar dates, update the naming convention for one of the beneficiary categories, and clarify instructions. The current OMB approval expiration date is 06/30/2022.

Request Abstract

In this clearance submission (3137-0090) and justification, IMLS is requesting approval of non-substantive changes to a previously approved clearance for the Guidelines for IMLS Grants to States Five-Year Evaluation, a statutory requirement. IMLS's authorizing legislation (20 U.S.C. § 9134) directs State Library Administrative Agencies (SLAAs) to "independently evaluate, and report to the Director regarding, the activities assisted under this subchapter, prior to the end of the Five-Year Plan." This evaluation provides SLAAs an opportunity to measure progress in meeting the goals set in their approved Five-Year Plans with a framework to synthesize information across all state reports in telling a national story. The changes consist of:

- Updating the five-year cycle date references from 2018-2022 to 2023-2027;
- Adding five-year cycle date references in place of more vague references such as "last" and "new;"
- Updating the due date from March 30, 2022 to March 30, 2027
- Updating the beneficiary category "ethnic or minority populations" to "individuals from racial or ethnic minority populations;"
- Updating "you" references in the Process and Methodology questions to explicitly reference either the State Library Administrative Agency (SLAA) or the independent evaluator;
- Splitting one of the multi-part Process questions into two separate questions;
- Moving one of the Methodology questions into the Process questions section, where it conceptually fits better;
- Updating references to the Methodology and Process questions to reflect the new numbering; and
- Making minor copyedits to clarify instructions.

Burden Estimate:

The number of respondents is 59 State Library Administrative Agencies (SLAAs). The total number of annual burden hours is estimated to be 5,310 hours, which is unchanged from the previous version, approved 06/30/2019. This is based on estimates of 90 hours that an applicant will need to review instructions, search existing data sources, gather, and maintain the data needed, complete and review the components of the application, and submit through stateprograms@imls.gov. Note that the collection does not occur annually, but only once every five years.

The estimated cost burden to respondents is \$156,220.20, representing an increase of \$7,859.20. The cost per hour is based on \$29.42 as reflected in the Bureau of Labor Statistics average median hourly wage of librarians (https://www.bls.gov/oes/current/oes_nat.htm#25-0000).

The total federal cost is \$10,287.24 based on 4 hours to process each of 59 evaluations, at an average IMLS staff salary of \$43.59 per hour.