

## **A. Justification: Notice of Funding Opportunity: Native American Library Services Basic Grants, OMB Control Number 3137-0093**

### **1. Necessity of the Information Collection**

The Institute of Museum and Library Services (IMLS) requests a renewal clearance for the Native American Library Services Basic Grants program under the Paperwork Reduction Act. The information collection in this package consists of the Notice of Funding Opportunity (NOFO) with instructions necessary to apply for IMLS support as part of the agency's grant programs.

#### **Background:**

**Application Notices of Funding Opportunities:** IMLS uses an iterative review process for each set of NOFOs in every fiscal year. The process is defined in IMLS's *Grants Administration Manual*, and it is designed to ensure that key stakeholders and agency officials review and authorize proposed Notices. In FY 2007, text common to all of IMLS grant program applications was rewritten to provide consistent information and language across all these program documents. Beginning in FY2013, IMLS complied with the Plain Writing Act of 2010 to provide "clear government communication that the public can understand and use." We at the Institute of Museum and Library Services are committed to writing new documents in plain language, using the [Federal Plain Language Guidelines](#).

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

The information collected through the NOFO will be used by IMLS staff to validate applicant eligibility, award grants, and to administer and monitor grants. It is also used by the agency for strategic planning, performance analysis, and to provide information to the Administration and to Congress. Data elements subject to FOIA also provide information about grant applications and programs to individuals outside the agency, and may be used by applicants to validate their project ideas or application strategies, to follow trends in their fields, and to identify effective practice that can be widely adapted to improve the quality of museum and library services in the United States. 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 maximize the efficiency and effectiveness of its programs, while reducing burden on potential applicants. All information collected through this NOFO will be submitted through Grants.gov. The data provided by applicants will be automatically ingested into eGMS, the agency's electronic grants management system, through a system-to-system interface, thus saving many hours of data entry time.

All submitted proposals and associated correspondence and documents will be stored in eGMS as the permanent record of the application, including associated peer reviews.

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

All IMLS grant application NOFOs and publications 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 Office of Grants Policy and Management. This annual review process protects against duplication. This NOFO does not duplicate any other collection being conducted by IMLS, nor are we aware of any other information collections that support the administration of a similar program of this scope and intent.

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

Participation is entirely voluntary. No small businesses are impacted, but some applicants for IMLS funding are small Native American tribes. Every effort has been made to streamline processes and instructions and to simplify the application and reporting processes. The agency's internal clearance process ensures that no undue burden is placed on any applicant for IMLS funding.

#### **6. Consequences of Less Frequent Data Collection**

This collection of information is 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. This information collection has one deadline in a grant year.

#### **7. Special Circumstances**

The proposed data collection activities are consistent with the guidelines set forth in 5 CFR 1320.6 (Controlling Paperwork Burden on the Public-General Information Collection Guidelines). There are no special circumstances that require deviation from these guidelines.

#### **8. Consultations Outside the Agency**

The 60-day Federal Register Notice for the Native American Basic Grant Program (3137-0093) was published in the Federal Register 85 FR 64170 on October 9, 2020. No public comments were received. A 30-day notice requesting comment was published in the Federal Register 85 FR 81524, December 16, 2020.

IMLS uses several different mechanisms to consult with persons outside the agency. Contact information for program officers is widely distributed and easily accessible from the IMLS website, and grantees and potential applicants are encouraged to communicate frequently with these experts. In addition, program officers convene nationwide conference calls to answer questions and take input. IMLS program staff also travel to national, regional, and local meetings of potential applicants to discuss program requirements. Finally, agency staff consults informally with its communities throughout the year, semiannual information meetings hosted for representatives of key professional associations, and IMLS convenings for other purposes.

IMLS notes and evaluates suggestions for revising NOFOs and reporting forms received from applicants responding to the invitation for comments found in the burden statement contained in each information collection. Efforts are continually made to shorten and simplify application instructions and forms in response to suggestions made by respondents.

#### **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 estimated number of respondents is 200. This number was estimated based on an assessment of the number of applicants in recent fiscal years. The number of annual burden hours is estimated to be 2,000, based on the estimate 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 narrative components of the application.

#### **13. Estimate of Cost Burden to Respondents**

The estimated cost to applicants is \$59,540.00. The average cost per hour is based on \$29.77, the Bureau of Labor Statistics average mean hourly wage of a librarian. The estimated burden hour cost is 10 hours per application.

Note: The cost for completion of forms associated with applications is accounted for in the ICR for clearance of the post-award Native American Library Services Basic Grants Final Performance Report form (OMB Control #3137-0098).

The two cost components for total capital/start-up and operation/maintenance/purchase of services are not applicable.

#### **14. Estimate of Costs to Federal Government**

The annualized cost to IMLS is estimated at \$30,687.36. The agency expects to receive 200 applications. Approximately 704 hours (varies from 1 to 1.5/hour average time to process one complete application) are spent by IMLS staff reviewing and processing each response at an average wage of \$43.59.

#### **15. Explanation of Change in Burden**

The change in burden reflects a smaller number of applicants.

#### **16. Statistical Usage**

Not applicable.

#### **17. Request to Not Display Expiration Date**

We are not requesting an exemption from the requirements to display the expiration date for OMB approval. All data collection materials and documentation will include the OMB approval number and expiration date.

#### **18. Exception to Certification Statement**

No exceptions to the certification statement apply to this program.