

A. Justification: Notice of Funding Opportunity: IMLS American Rescue Plan Grant Program, OMB Control Number 3137-NEW

1. Necessity of the Information Collection

The Institute of Museum and Library Services (IMLS) requests a new clearance for the IMLS American Rescue Plan grant program for its grant program processes under the Paperwork Reduction Act. The information collections in this package include one Notice of Funding Opportunity, one Program Information Form, and the instructions necessary to apply for IMLS support as part of the agency's American Rescue Plan grant program.

Background:

Application Notices of Funding Opportunities: IMLS uses an iterative review process for each set of Notices of Funding Opportunities 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 of Funding Opportunities. IMLS complies with the Plain Writing Act of 2010 to provide "clear government communication that the public can understand and use." IMLS is committed to writing new documents in plain language, using the [Federal Plain Language Guidelines](#).

The American Rescue Plan Act of 2021 (Pub. L. No. 117-2 [March 11, 2021]) has provided funds to IMLS to support museums, libraries, and related organizations in addressing community needs created or exacerbated by the COVID-19 pandemic and in assisting in recovery. The IMLS American Rescue Plan grant program invites project proposals that (1) strengthen the institutional capacity of museums, libraries, and related organizations to respond to community needs quickly, effectively, efficiently, and responsibly; and (2) increase the ability of museums, libraries, and related organizations to deliver programs and services that contribute to the well-being of families, groups, and individuals of all cultural and socioeconomic backgrounds. Projects may continue, enhance, or expand existing programs and services, or they may launch new ones to address emergent requests and unexpected hardships.

2. Purposes and Uses of the Data

The information collected by IMLS will be used by the agency to carry out this grant program. The information will be used by IMLS staff to validate applicant eligibility, identify and assign peer reviewers, manage the grant competition, award discretionary grants, and to administer and monitor the grants. It will also be used by the agency for strategic planning, performance analysis, and to provide information to the Administration and to Congress. Data elements subject to FOIA will provide information about the grant applications and programs to individuals outside the agency, and it may be used by future 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 improve the efficiency and effectiveness of its programs, while reducing burden on potential applicants. Applicants can download the IMLS American Rescue Plan Notice of Funding Opportunity and application instructions online. IMLS requires all applicants to apply for IMLS awards online through Grants.gov.

4. Efforts to Identify Duplication

All IMLS grant application Notices of Funding Opportunities 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.

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 nonprofit organizations. 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.*), to identify needs and trends in museum, library, and information services, and to facilitate recovery from the COVID-19 pandemic under the American Rescue Plan Act of 2021 (Pub. L. No. 117-2 [March 11, 2021]). Supporting museums, libraries, and related organizations in addressing community needs and in facilitating recovery at this specific time must proceed quickly in order to be effective, making it necessary to undertake this data collection without delay.

7. Special Circumstances

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

8. Consultations Outside the Agency

IMLS routinely uses several different mechanisms to consult with persons outside the agency about its grant making. 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 and webinars 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, including regular meetings with the Chiefs of State Library Administrative Agencies, semiannual information meetings hosted for representatives of key professional associations, and IMLS convenings for other purposes.

During the grant application review process, outside experts are asked to review applications and discuss the agency's forms, instructions, and process. These experts are consulted by IMLS staff regarding the clarity and value of the Notices of Funding Opportunities and informally comment on the burden of response required by applicants.

IMLS notes and evaluates suggestions for revising Notices of Funding Opportunities 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 requests 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 2,400. This number was estimated based on an assessment of the number of applicants for IMLS grants, including the CARES Act grant programs, in FY 2020, the most recent year for which data are available. The number of annual burden hours is estimated to be 24,300, based on estimates 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 which includes the Program information Form.

13. Estimate of Cost Burden to Respondents

The estimated cost to applicants is \$731,430. The average cost per hour is based on \$30.10, the Bureau of Labor Statistics average mean hourly wage of librarians and museum curators. The estimated burden hour cost per application is 20.25 hours for the IMLS American Rescue Plan grant program application and Program Information Form (20.25 hours x \$30.10).

Note: The cost for completion of forms associated with applications is accounted for in the ICR for clearance for the general grant program application and post-award report form clearance.

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 \$78,462. The agency is estimated to receive 1,200 total applications and 1,200 Program Information Forms. Approximately 1.5 hours (1.25 hour average time to process one complete application and 0.25 hours to complete the Program Information Form) are spent by IMLS staff reviewing and processing each response at an average wage of \$43.59.

15. Explanation of Change in Burden

This is a new submission. There are no program changes or cost adjustments.

16. Statistical Usage

Not applicable.

17. Request to Not Display Expiration Date

Not applicable. The expiration date will be displayed.

18. Exception to Certification Statement

No exceptions to the certification statement apply to the IMLS American Rescue Plan grant program.