**Supporting Statement A. Justification: 21st Century Museum Professionals Program Notice of Funding Opportunity, OMB Control Number 3137-NEW**

## 1. Necessity of the Information Collection

The Institute of Museum and Library Services (IMLS) requests clearance for the 2024 IMLS 21st Century Museum Professionals Program Notice of Funding Opportunity under the Paperwork Reduction Act. The information collection in this package consists of one 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. For each round of NOFO production for clearance, text common to all IMLS grant program applications is reviewed and adjusted as necessary to provide consistent information and language across all program documents. 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.

## 2. Purposes and Uses of the Data

The information collected through the NOFO 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 awards. 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 also provide information about grant applications and programs to individuals outside the agency, and they 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 from 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 and to facilitate the delivery of significant results consistent with the IMLS federal authorizing legislation (20 U.S.C. § 9101 *et seq*. in particular, § 9175 (21st century museum professional program) and § 9173 (Museum services activities)) and its obligations to identify needs and trends in museum, library, and information service.

**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 this Notice of Funding Opportunity was published in the Federal Register 88 FR 46816-46817 on July 20, 2023. The agency received no public comments under this Notice. A 30-day notice requesting comment was published in the Federal Register 88 FR 65758-65759, September 25, 2023.

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, semiannual information meetings hosted for representatives of key professional associations, and IMLS convenings for other purposes. Over the last year, these interactions have taken place in various formal and informal situations in which museums, museum associations, and museum studies programs at Institutions of Higher Education have been present.

In addition, IMLS consistently notes and evaluates suggestions for revising its 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 to this Notice of Funding Opportunity is 40. This number has been estimated on the basis of an informal assessment of interest in the program. The estimated number of total burden hours is 1,800, calculated at 40 respondents spending 45 hours each per application 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 $52,704, representing 1,800 hours at an average cost per hour of $29.28, based on the Bureau of Labor Statistics average mean hourly wage of Archivists, Curators, and Museum Technicians.

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 $1,744. The agency expects to receive 40 applications. Reflecting the auto-ingestion of application data from Grants.gov via a system-to-system interface, approximately 1 hour at a mean hourly wage of $43.59 will spent by IMLS staff reviewing and processing each response.

**15. Explanation of Change in Burden**

This is a new initiative, and this will be the first cohort of applications received, so there is no change in burden.

**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.