Justification for Change
3137-0092 Generic Clearance for IMLS Grant Forms: Budget Form, Library and Museum Program Information Form, and Digital Product Form, EGMS PIS Supplementary Sheet, eGMS Abstract form Generic Clearance for the IMLS Budget Form and Digital Product Form

IMLS is requesting a change to a previously approved clearance in order to include the previously approved IMLS Budget Form and Digital Product Form. The current OMB approval expiration date of 2/29/2024 remains the same.

Request abstract:

In this clearance submission (3137-0092) and justification, IMLS is requesting a non-substantive change to a previously approved clearance for the IMLS Budget Form and Digital Product Form used by applicants to IMLS grant programs.

In FY2019, IMLS adopted eGMS, the electronic grants management system created by the National Endowment for the Humanities (NEH), as its system of record. In preparation for the shift from its previous proprietary grants management system, IMLS made several of its standard forms Grants.gov compatible. This made it possible for data provided by applicants to be immediately transferred from Grants.gov and ingested into the eGMS system, beginning with the FY20 grant cycle.

Budget Form:

We want to add this form back under the previously approved OMB Clearance. We will submit a non-substantive change request with new information and an updated burden estimate.

Burden Estimate:

The IMLS Budget Form and burden estimate were not included in the recent OMB clearance. The estimated number of respondents completing the IMLS Budget Form is 1,268. The total number of annual burden hours is estimated to be 3,804 hours, based on estimates of the average number of 3 hours that an applicant will need to review instructions, search existing data sources, gather and maintain the data needed, and complete and review the components of the form.

The estimated cost burden to respondents is $95,936.88. The average cost per hour is based on $25.22, the 2018 Bureau of Labor Statistics average mean hourly wage of library and museum staff.

Digital Product Form

The Digital Product Form and burden estimate were not included in the recent OMB clearance. We want to add this form and burden estimate back under the previously approved OMB clearance. We will submit a non-substantive change request to retire this form. Based on both feedback from users and internal analyses, IMLS has determined that instead of using a form, it will be more efficient to request that applicants whose proposals involve creating digital products

and/or collecting research data prepare separate narrative-style documents, not to exceed two pages each, that they will save as PDFs and upload with their applications through Grants.gov. Instructions to applicants for preparing these documents will be embedded in the appropriate Notices of Funding Opportunity, as will instructions to peer reviewers for assessing responses. We believe this approach will be less burdensome to applicants.

The 2018 estimated number of respondents completing the Digital Product Form was 1,268. The total number of annual burden hours was estimated to be 1,268 hours, based on estimates of the average number of 1 hour that an applicant will need to review instructions, search existing data sources, gather and maintain the data needed, and complete and review the components of the form.

The estimated cost burden to respondents was $31,979. The average cost per hour is based on $25.22, the 2018 Bureau of Labor Statistics average mean hourly wage of library and museum staff.