

## **Justification for Change**

3137-0092 Generic Clearance for the IMLS Budget Form and Notification of the Intention to Retire the Digital Product Form

IMLS is requesting a change to a previously approved clearance in order to update one agency form and to retire another. 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 (1) requesting a non-substantive change to a previously approved clearance for the IMLS Budget Form used by applicants to IMLS grant programs and (2) notifying OMB of the agency's intent to retire the Digital Products Form from use.

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. Two forms, however, remained structured as fillable PDFs, and we seek to make a small adjustment in one of these and to retire the other in advance of the FY22 grant cycle.

### **Budget Form:**

We want to edit the heading of Section 5 to change from "Contracts and Subawards" to "Subawards and Contracts." This will align better with 2 C.F.R. 200 references.

### **Digital Product 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.

### **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 3,268. The total number of annual burden hours is estimated to be 9,804 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 \$295,100.40. The average cost per hour is based on \$30.10, the Bureau of Labor Statistics average mean hourly wage of library and museum staff.

The total Federal Cost is \$71,226.06 based on 0.5 hours of agency staff time to process the forms at an average salary of \$43.59.

The change in the burden estimate since the last request for clearance reflect (1) small increases in average wage calculations, (2) significant increases in the number of applications submitted to IMLS (as the result of additional CARES Act and American Rescue Plan funding), and (3) the decision to retire the Digital Product Form.