

**Supporting Statement Part A Justification
2024-2026 IMLS Grant Application Forms
OMB Control Number 3137-0092**

1. Necessity of the Information Collection

The Institute of Museum and Library Services (IMLS) requests a renewal clearance for the IMLS Grant Application Forms under the Paperwork Reduction Act. The current clearance expires on February 29, 2024, but our schedule of grant-making spread over the entire fiscal year and our desire to make sure all grant programs utilize the same versions of the forms underlie our request for an earlier-than-might-be-expected renewal. The information collections in this package include instructions necessary for organizations to apply for grant funding IMLS.

Background

To facilitate the administration of the IMLS application and review processes for its discretionary grants and cooperative agreements, IMLS uses standardized application forms for eligible libraries, museums, and other organizations to apply for its funding. The forms submitted for public review in this Notice are the IMLS Library-Discretionary Program Information Form, the IMLS Museum Program Information Form, and the IMLS Supplementary Information Form.

Beginning in FY2020, IMLS implemented the eGMS (Electronic Grants Management System) originally developed by the National Endowment for the Humanities and now used also by the National Endowment for the Arts and IMLS. The IMLS Library-Discretionary Program Information Form, the IMLS Museum Program Information Form, and the IMLS Supplementary Information Form are each included in one or more of the Grants.gov application packages associated with IMLS grant programs, and they automatically transmit data into eGMS through a system-to-system interface.

This action is to renew the forms and instructions associated with all IMLS Notice of Funding Opportunities for the next three years.

2. Purposes and Uses of the Data

The information collected by IMLS through these forms is used by the agency to identify any high-level financial concerns about applicants, identify alignments with agency- and grant program-level goals and objectives, validate applicant eligibility, capture descriptive keywords to aid in compilations describing the agency's grantmaking, assign peer reviewers, and manage the peer review processes. 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 IMLS's 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 practices that can be widely adapted to improve the quality of museum and library services in the United States.

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. Each of these forms is incorporated into one or more of the Grants.gov application packages associated with IMLS

discretionary grant programs and is thus accessed through Grants.gov Workspace. The data entered by applicants is automatically transferred to eGMS, the agency's electronic grants management system, through a system-to-system interface, thus saving many hours of data entry time.

4. Efforts to Identify Duplication

All IMLS externally facing documents 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 from small non-profit 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

These collections of information are 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.

7. Special Circumstances

None of the listed conditions apply.

8. Consultations Outside the Agency

The 60-Day Notice for the 2024-2026 IMLS Grant Application Forms (3137-0092) was published on December 7, 2022 in the Federal Register (87 FR 75068-75069). The agency received no comments under this Notice. A 30-day notice requesting comment for the OMB clearance was published in the Federal Register on March 31, 2023 in the Federal Register 88 FR 19331.

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, including semiannual information meetings hosted for representatives of key professional associations, and IMLS convening events for other purposes.

IMLS notes and evaluates all suggestions from applicants, for revising Notices of Funding Opportunities and reporting forms, 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 applicants.

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. Files are subject to FOIA requests and are handled on a case-by-case basis. IMLS intends to make final reports available via its website and so informs applicants and grantees.

11. Justification for Sensitive Questions

There are no questions of a sensitive nature.

12. Estimate of Hour Burden to Respondents

The estimated annual number of respondents is 1,720 total for the three forms. This number was estimated based on a count of the number of applicants for IMLS standard discretionary grant programs in recent years, not counting stimulus grant programs that are unlikely to be repeated. Applicants to museum grant programs complete the IMLS Museum Program Information Form, and applicants to library grant programs complete the IMLS Library-Discretionary Program Information Form. For brand new grant programs that may be developed during the period for which this control number is valid, applicants will complete the IMLS Supplementary Information Form, which requests all the same information asked for in the other two forms with the exception of the name of the program. The number of annual burden hours is estimated to be 1,290 hours, based on estimates of the average number of 45 minutes that a respondent needs to review instructions, search existing data sources, gather and maintain the data needed, and complete and review the components of the forms.

13. Estimate of Cost Burden to Respondents

The annual estimated cost burden to respondents is \$39,697.28 for the three forms. The burden hours total 1,290 representing an average of 45 minutes required to complete each individual form and an average of 430 hours for respondents to complete the forms of one type. The average costs per hour are based on the Bureau of Labor Statistics mean hourly wages for library (\$30.86) and museum (\$30.71) staff (average = \$30.79).

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 annual total cost to the Federal Government is estimated to be \$35,432.00 for the three forms. The time required to process one form is estimated to be 30 minutes and the mean hourly wage for a staff member doing this work is \$41.20.

15. Explanation of Change in Burden

The change in burden for respondents reflects a more accurate assessment of the time required to prepare each form, the integration of information formerly requested via two forms into a single but more detailed form, and increases in the mean hourly wage for library staff and museum curators.

16. Statistical Usage

Not applicable.

17. Request to Not Display Expiration Date

Not applicable. The new expiration date will be displayed.

18. Exception to Certification Statement

Not applicable.