

A. Justification: Generic Clearance for Grant Programs for the Institute of Museum and Library Services, OMB Control Number 3137-0029

- The Institute of Museum and Library Services (IMLS) requests generic clearance for all of the agency’s information collection requests (excluding surveys, evaluations, and data calls used for policy-making purposes) for its grant program processes under the Paperwork Reduction Act.** The information collections in this package include all of the guidelines and instructions necessary to (1) apply for IMLS support, (2) identify grant reviewers, and (3) complete post-award reports for the agency’s grant programs. **In a separate complementary clearance submission and justification submitted at the same time, IMLS is requesting a three-year generic clearance for all forms used in its grant programs, including application materials and post-award reports.**

**Background:** On 11/29/2006, IMLS requested, and the Office of Management and Budget (OMB) approved, an extension of this generic clearance until 4/30/2007, to enable the agency to consolidate all of its forms under one clearance and take steps to ensure consistency of language across its grant program guidelines and materials. OMB approved this request, with modification, on July 31, 2007. IMLS now requests OMB clearance of the information collections the Institute requires to carry out its grant programs.

The general clearance now in effect includes the following grant programs’ application guidelines, forms, and the processes associated with them:

IMLS requests that this current general clearance be extended for three years.

<b>Program</b>	<b>OMB Clearance No.</b>	<b>Expiration date</b>
American Heritage Preservation	3137-0029	07/31/2010
Connecting to Collections Statewide Implementation	3137-0029	07/31/2010
Conservation Project Support	3137-0029	07/31/2010
Museums for America	3137-0029	07/31/2010
Native American Library Services Basic	3137-0029	07/31/2010
National Medal for Museum and Library Service	3137-0029	07/31/2010
Native American Library Services Enhancement	3137-0029	07/31/2010
Native Hawaiian Library Services	3137-0029	07/31/2010
Laura Bush 21 <sup>st</sup> -Century Librarian Program	3137-0029	07/31/2010
Native American/Native Hawaiian Museum Services	3137-0029	07/31/2010
21 <sup>st</sup> Century Museum Professionals Program	3137-0029	07/31/2010
National Leadership Grants for Libraries and Museums	3137-0029	07/31/2010
Museum Grants for African American History and Culture	3137-0029	07/31/2010

As new grant initiatives are established within the period of the renewed clearance, IMLS expects to use the submitted application guideline content and application forms, and the current, ongoing, internal review process for programs and guidelines. The agency continually makes minor adjustments to programs and priorities to address emerging needs and other changes in the environment.

**Application guidelines:** IMLS uses an iterative review process for each set of guidelines in every fiscal year. The process is defined in IMLS’ *Grants Administration Manual* and it is designed to ensure that key stakeholders and agency officials review and authorize proposed guidelines. In FY 2007, text common to all of IMLS grant program applications was rewritten to provide consistent

information and language across all of these program documents.

2. The information collected by IMLS is used by the agency to carry out its grant programs. The information is used by IMLS staff to validate applicant eligibility, identify and assign peer reviewers, manage grant competitions, award discretionary and formula-based grants, and administer and monitor its grants. 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' 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 practice that can be widely adapted to improve the quality of museum and library services in the United States.
3. During the agency's FY 2010 discretionary grant cycle, applicants submitted applications online for all of the Institute's programs through Grants.Gov. The use of Grants.Gov was required for all the agency's grant programs. Beginning in FY 2008, IMLS required all discretionary applicants to apply for Federal financial assistance through Grants.Gov. In the Institute's Grants to State Library Administrative Agencies Program, the Five-Year Plan, annual State Program Report and annual Financial Status report are all submitted on-line. Nominations for National Medals for Museum and Library Service are submitted by regular mail.
4. Beginning in FY 2007, IMLS posted application packages for all of its discretionary grant programs on Grants.Gov. All of the forms used by IMLS for applications, post-award reporting, and the Grants to State Library Administrative Agencies program were reviewed, consolidated, and validated through an iterative process involving staff and managers. Particular attention was paid to standard government-wide forms and forms cleared by other agencies that are available for use on Grants.Gov. For its discretionary programs, IMLS uses the SF 424S and Grants.Gov forms for Abstracts and Attachments, as well as SF 425 for post award reporting. The agency has reduced the use of non-standard forms, and is providing fifteen forms to OMB: five forms used in discretionary grant applications, five forms used in post-award reporting, two forms specific to Grants to States, and three forms for other applications. See question 8 for additional detail. The State Grants Program annual reporting process has been updated and made electronic to increase consistency and efficiency. All IMLS grant application guidelines 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 Grants Office. This annual review protects against duplication.
5. No small businesses are impacted, but some applicants for IMLS funding are 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. 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 library and museum service. The information collections included in this package vary in frequency. Many are one time per application, others are annual or semiannual; one is every five years.
7. None of the listed conditions apply.
8. The 60-day notice for this collection was published in the Federal Register Vol. 75, no. 82 (April 29, 2010), pages 22631-22632. No public comments were received. A second 30-day notice requesting comment for this generic clearance was published in the Federal Register: Vol. 75, no. 131 (Friday, July 9, 2010) pages 39582-39583.

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 Web site 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 regular meetings with the Chiefs of State Library Administrative Agencies, semiannual information meetings hosted for represents 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 guidelines and informally comment on the burden of response required by applicants.

IMLS notes and evaluates suggestions for revising guidelines 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. No payments or gifts are provided to any of the respondents.
10. All IMLS guidelines and application instructions contain a notice furnished in compliance with the Privacy Act.
11. No information on sexual behavior, religious beliefs, or other personal matters is solicited.
12. The number of respondents is 1,716, the number of applicants for IMLS grants in FY 2009, the most recent year for which data is available. The number of annual burden hours is 50,308, 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. Burden hours per application range from 2 hours to 90 hours, depending on the complexity of an applicant's grant project.

Note: burden hours for completing forms associated with applications are accounted for in the ICR for generic clearance for applications and reporting forms.

Fifty-six respondents and 5,040 burden hours represent the Five-Year Plan for Grants to State Library Administrative Agencies, required by law from each SLAA at five year intervals and due in this clearance period.

13. The estimated cost to applicants is \$1,323,099. The cost per hour is based on \$26.30, the Bureau of Labor Statistics mean hourly wage of a museum or library professional. The estimated burden hour cost per application ranges from \$52.60 for the simplest application to \$2,367.00 for a complex, large-scale project. IMLS discretionary grants range in size from \$3,000 to over \$1,000,000; burden correlates well with grant size.

The total estimated cost to State Library Administrative Agencies for the Five-Year Plan is \$130,947.70, which is incurred once every five years. The estimated cost to each SLAA is \$2,338. Grants to the 50 States, the District of Columbia, the Commonwealth of Puerto Rico,

Guam, American Samoa, the U.S. Virgin Islands, the Commonwealth of the Northern Mariana Islands, the Republic of the Marshall Islands, the Federated States of Micronesia, and the Republic of Palau and have ranged from \$88,735 to \$16,882,275; burden is positively correlated with grant size.

Note: the cost for completion of forms associated with applications is accounted for in the ICR for generic clearance for applications and reporting forms.

The two cost components for total capitol/start-up and operation/maintenance/purchase of services are not applicable.

14. Not applicable.

15. The IMLS burden may change slightly from year to year as new needs are identified and priorities shift in response to appropriations and to changes in the museum and library environments. Programs may be added, enlarged, reduced or discontinued. In that period IMLS added five programs, including the Laura Bush 21<sup>st</sup>-C Librarian Grants, which have grown from \$50,000,000 to \$100,000,000 per year. Applications in this period exceeded expectations, allowing IMLS to reach more institutions and communities with federal funding.

The burden estimates submitted here for forms and applications total 50,308 hours and \$1,323,099. A small portion of the increase is due to a recalculated average hourly wage for IMLS respondents, from \$23.64 to 26.30.

16. Not applicable.

17. Not applicable.

18. Not applicable. The expiration date will be displayed.

19. Not applicable.